ORANGE COUNTY BOARD OF SUPERVISORS

Agenda Revisions and Supplementals

Note: *This supplemental agenda is updated daily showing items that have been added, continued, deleted or modified. No new supplemental items will be added to the agenda following close of business on Friday immediately prior to a Board meeting*.

December 17, 2024

DISCUSSION

31. Revised Title to read:
County Executive Office - Approve grant applications/awards submitted *by District Attorney and Sheriff-Coroner and retroactive grant application/awards submitted by Health Care Agency* in 12/17/24 grant report and other actions as recommended*; adopt resolution authorizing District Attorney or designee to execute grant award agreement and amendments with California Office of Emergency Services for Victim/Witness Assistance Program, 10/1/24 - 9/30/25 ($3,120,408); and making California Environmental Quality Act (CEQA) exemption findings pursuant to CEQA Guidelines Section 15061(b)(3) and other findings; and adopt resolution authorizing Director, Behavioral Health Services, to submit retroactive grant application, and execute Standard Agreement with Department of Health Care Services for Bond Behavioral Health Continuum Infrastructure Program (BHCIP) Road 1: Launch Ready ($300,050,000)* - All Districts

PUBLIC HEAIRNG

33. Revised Title to read:
County Counsel - Public Hearing to consider adopting Resolution adopting General Plan Amendment H20-01 (6th Cycle Housing Element); *direct staff to revise Housing Element language in light of The Ohio House v. City of Costa Mesa decision prior to submittal to Department of Housing and Community Development;* and consider application of Final Negative Declaration No. IP 22-0133 and Addendum 1 and other findings - All Districts

THE FOLLOWING AGENDA ITEMS HAVE HAD CHANGES TO THEIR RECOMMENDED ACTIONS SINCE RELEASE OF THE AGENDA TO THE PUBLIC:

Item: 33

Supplemental Item(s)

S31A. **Chairman Wagner** - Approve revised 2024 Chairman's appointments of board members to various boards, commissions and committees

S31B. **County Executive Office** - Approve amendment 2 to extend lease agreement with KB Stadium Crossings MT, LLC for 53,674 square feet of office space for Social Services Agency located at 2125 E. Katella, Anaheim, 1/1/25 - 3/31/28; authorize Chief Real Estate Officer of designee to execute subsequent documents, option terms and amendment under certain conditions; and make California Environmental Quality Act (CEQA) exemption findings pursuant to CEQA Guidelines Section 15301 - District 2

Document last updated: 12/12/2024 4:21 PM

Agenda Item 31

AGENDA STAFF REPORT

ASR Control 23-001056

MEETING DATE:	12/17/24
LEGAL ENTITY TAKING ACTION:	Board of Supervisors
BOARD OF SUPERVISORS DISTRICT(S):	All Districts
SUBMITTING AGENCY/DEPARTMENT:	County Executive Office (Approved)
DEPARTMENT CONTACT PERSON(S):	Peter DeMarco (714) 834-5777
	Andrea Foster (714) 834-2009

SUBJECT: Grant Applications/Awards Report

CEO CONCUR	**COUNTY COUNSEL REVIEW**	**CLERK OF THE BOARD**
Concur	Approved Resolution to Form	Discussion 3 Votes Board Majority

Budgeted: N/A **Current Year Cost:** N/A **Annual Cost:** N/A

Staffing Impact: No **# of Positions:** **Sole Source:** N/A

Current Fiscal Year Revenue: N/A

Funding Source: N/A **County Audit in last 3 years:** No

Levine Act Review Completed: N/A

Prior Board Action: N/A

RECOMMENDED ACTION(S):

Approve grant applications/awards as proposed and other actions as recommended.

1. Receive and File Grants Report.

2. Approve Grant Award and Adopt Resolution – District Attorney – Victim/Witness Assistance Program - $3,120,408

3. Retroactively Approve Grant Application and Adopt Resolution – Health Care Agency - Bond Behavioral Health Continuum Infrastructure Program (BHCIP)Round 1 Launch Ready (UCI) - $300,050,000

4. Approve Grant Award – Sheriff-Coroner – FY 2024 Edward Byrne Memorial Justice Assistance Grant (JAG)Program – Local Solicitation – $454,311

SUMMARY:

See the attached Grants Report.

BACKGROUND INFORMATION:

See the attached Grants Report.

FINANCIAL IMPACT:

N/A

STAFFING IMPACT:

N/A

ATTACHMENT(S):

Attachment A - Grants Report
Attachment B - DA FY24-25 Victim Witness Assistance Program
Attachment C - HCA Updated Resolution BHCIP 12.24

Grants Report

DRAFT

County Executive Office/Legislative Affairs

December 17, 2024
Item No: 31

County of Orange Report on Grant Applications/Awards

The Grants Report is a condensed list of grant requests by County Agencies/Departments that allows the Board of Supervisors to discuss and approve grant submittals in one motion at a Board meeting. County policy dictates that the Board of Supervisors must approve all grant applications prior to submittal to the grantor. This applies to grants of all amounts, as well as to new grants and those that have been received by the County for many years as part of an ongoing grant. Receipt of grants $50,000 or less is delegated to the County Executive Officer. Grant awards greater than $50,000 must be presented to the Board of Supervisors for receipt of funds. This report allows for better tracking of county grant requests, the success rate of our grants, and monitoring of County's grants activities. It also serves to inform Orange County's Sacramento and Washington, D.C. advocates of County grant activities involving the State or Federal Governments.

On December 17, 2024, the Board of Supervisors will consider the following actions:

RECOMMENDED ACTIONS

Approve grant applications/awards as proposed and other actions as recommended.

ACTION ITEMS:

1. Receive and File Grants Report

2. Approve Grant Award and Adopt Resolution – District Attorney – Victim/Witness Assistance Program - $3,120,408

3. Retroactively Approve Grant Application and Adopt Resolution – Health Care Agency - Bond Behavioral Health Continuum Infrastructure Program (BHCIP) Round 1 Launch Ready (UCI) - $300,050,000

4. Approve Grant Award – Sheriff-Coroner – FY 2024 Edward Byrne Memorial Justice Assistance Grant (JAG) Program – Local Solicitation – $454,311

If you or your staff have any questions or require additional information on any of the items in this report, please contact Andrea Foster at (714) 834-2009.

CEO-Legislative Affairs Office
Grant Authorization eForm

GRANT APPLICATION / GRANT AWARD

Today's Date:	December 5, 2024
Requesting Agency/Department:	District Attorney
Grant Name and Project Title:	Victim/Witness Assistance Program
Sponsoring Organization/ Grant Source: (If the grant source is not a government entity, please provide a brief description of the organization/foundation)	California Governor's Office of Emergency Services
Application Amount Requested:	$3,120,408
Application Due Date:	June 21, 2024
Board Date when Board Approved this Application:	March 12, 2024
Awarded Funding Amount:	$3,120,408
Notification Date of Funding Awarded:	December 5, 2024
Is this an Authorized Retroactive Grant Application/Award? No	
Recurrence of Grant:	Yes
If this is a recurring grant, please list the funding amount applied for and awarded in the past:	Applied / Awarded FY 22-23 $3,039,719 $3,039,719 FY 23-24 $3,035,977 $3,035,977
Does this grant require CEQA findings?	No
What Type of Grant is this?	**Award** - Competitive
County Match?	No
How will the County Match be fulfilled? (Please include the specific budget)	N/A
Will the grant/program create new part or full-time positions?	No
Purpose of Grant Funds:	Provide summary and brief background on why the Board of Supervisors should accept this grant application/award, and how the grant will be implemented.

The Victim/Witness Assistance Program is supported by the Federal Victim of Crime Act. The program provides high quality, comprehensive services that address the individual needs of victims and witnesses of violent crime. The District Attorney was awarded $3,120,408 to continue the program.

Grant funds support a specialized team within Waymakers to provide coordination for the appearance of all subpoenaed witnesses in misdemeanor trials, preliminary trials, preliminary felony hearings and felony trials at the request of the OCDA. Service requirements include placing witnesses “on-call”, making case status and

disposition available to the witness, notification and intervention with the witness' employer, arranging transport of the witness to court, and "call-off" of witnesses. The team consists of program directors, victim advocates and coordinators to assist victims.

Board Resolution Required?	Yes
Deputy County Counsel Name:	James Harman

Recommended Action(s)
(Please specify below)

Cal OES requires the District Attorney to submit a Board Resolution. County Counsel has reviewed and approved the attached Board Resolution.

1. Authorize the District Attorney or his designee, to sign and execute, on behalf of the County of Orange, the Grant Agreement with CalOES accepting the grant award of $3,120,408 to continue the Victim/ Witness Assistance Program for fiscal years 2024-25.
2. Authorize the District Attorney, or his designee, to execute, on behalf of the County of Orange, any extensions or amendments that reflect the actual grant award but do not materially alter the terms of the grant award.
3. Adopt the Resolution to receive funds for the Victim Witness Assistance Program.

Department Contact:	List the name and contact information (telephone, email) of the person to be contacted for further information.
Matthew Pettit (714) 347-8440 matthew.pettit@ocdapa.org	
Name of individual attending the Board Meeting:	List the name of the individual who will be attending the Board Meeting for this Grant item:
Matthew Pettit	

RESOLUTION OF THE BOARD OF SUPERVISORS OF
ORANGE COUNTY, CALIFORNIA

December 17, 2024

WHEREAS, the County of Orange desires to undertake its project designated "The Victim/Witness Assistance Program" to be funded from funds made available through the Federal Victim of Crime Act administered by the California Governor's Office of Emergency Services (hereafter referred to as Cal OES).

NOW, THEREFORE, BE IT RESOLVED that this Board does hereby:

1. Find that the proposed project is exempt from CEQA pursuant to 14 C.C.R. 15061(b)(3) because it does not impose a significant effect on the environment.
2. Find that pursuant to Section 711.4 of the California Fish and Game Code, the proposed project is exempt from the required fees as it has been determined that no adverse impacts to wildlife resources will result from the project.
3. Authorize the District Attorney, or his designee, to sign and execute, on behalf of the County of Orange, a Grant Award Agreement with Cal OES for the Victim/Witness Assistance Program, effective from October 1, 2024 to September 30, 2025, in the amount not to exceed $3,120,408.
4. Authorize the District Attorney, or his designee, to execute, on behalf of the County of Orange, any extensions or amendments that reflect the actual grant award but do not materially alter the terms of the grant award.
5. Assure that the County of Orange assumes any liability arising out of the County's performance of this Grant Award Agreement, including civil court actions for damages. The State of California and Cal OES disclaim responsibility for any such liability.
6. Assure that the County of Orange will not use grant funds to supplant expenditures controlled by the Board of Supervisors.

VERONICA KELLEY, DSW, LCSW
AGENCY DIRECTOR

JASON AUSTIN, MA, LMFT
ASSISTANT AGENCY DIRECTOR

405 W. 5th STREET, 7th FLOOR
SANTA ANA, CA 92701
www.ochealthinfo.com

OFFICE OF THE DIRECTOR

DATE: December 11, 2024

TO: Michelle Aguirre
Interim County Executive Officer

Digitally signed by Michelle Aguirre
DN: cn=Michelle Aguirre, o=County of Orange, ou=CEO, email=michelle.aguirre@ocgov.com, c=US
Date: 2024.12.11 10:01:41 -08'00'

FROM: Veronica Kelley
Agency Director

SUBJECT: Retroactive Request to Approve Submittal of Bond Behavioral Health Continuum Infrastructure Program (BHCIP) Round 1 Launch Ready

This memo is being submitted to request that the County Executive Officer place the subject grant application on the December 17 Board of Supervisors Meeting Agenda. This is due to a request for an increased application amount and updated resolution. On December 3, 2024, the Board approved the Health Care Agency's (HCA) Bond Behavioral Health Continuum Infrastructure Program (BHCIP) Round 1 Launch Ready application and resolution in the amount of $270,000,000. After this approval, the Health Care Agency received updated construction cost from University of California, Irvine (UCI), our grant co-applicant, for the amount of $300,050,000. The HCA requests retroactive approval for the submittal for the grant application on December 13, 2024, for the updated amount of $300,050,000. Submittal of the application in the updated amount also requires an updated Board Resolution.

If you have any questions about the grant, please contact Ian Kemmer, Behavioral Health Services Director at 714 834-2160.

Thank you for your consideration,

Veronica Kelley
Agency Director

CEO-Legislative Affairs Office
Grant Authorization eForm

GRANT APPLICATION / GRANT AWARD

Today's Date:	December 11, 2024
Requesting Agency/Department:	Health Care Agency
Grant Name and Project Title:	Bond Behavioral Health Continuum Infrastructure Program (BHCIP) Round 1 Launch Ready (UCI)
Sponsoring Organization/ Grant Source: (If the grant source is not a government entity, please provide a brief description of the organization/foundation)	California Department of Health Care Services (DHCS)
Application Amount Requested:	$300,050,000
Application Due Date:	December 13, 2024
Board Date when Board Approved this Application:	N/A
Awarded Funding Amount:	N/A
Notification Date of Funding Awarded:	N/A
Is this an Authorized Retroactive Grant Application/Award? Retroactive	
Recurrence of Grant:	No
If this is a recurring grant, please list the funding amount applied for and awarded in the past:	N/A
Does this grant require CEQA findings?	No
What Type of Grant is this?	**Application** - Competitive
County Match?	Yes
How will the County Match be fulfilled? (Please include the specific budget)	10% match will be met in-kind with the equity value of property
Will the grant/program create new part or full-time positions?	No
Purpose of Grant Funds:	Provide summary and brief background on why the Board of Supervisors should accept this grant application/award, and how the grant will be implemented.

At the December 3, 2024, Board meeting the Board approved the grant application in the amount of $270,000,000. The budget has since increased to $300,050,000. The HCA requests retroactive approval for the submittal for the grant application on December 13, 2024, for the updated amount of $300,050,000.

The Bond Behavioral Health Continuum Infrastructure Program (BHCIP) Round 1: Launch Ready Program is designed to address historic gaps in the behavioral health care continuum and meet the growing demand for services and support across the life span of vulnerable individuals in need. This program aims to develop an array of behavioral health treatment, residential care settings, and supportive housing to help provide appropriate

care facilities for Californians experiencing mental health conditions and substance use disorders, modernize the behavioral health delivery system, improve accountability, increase transparency, and expand capacity of behavioral health care facilities for California residents. DHCS is prioritizing regional models or collaborative partnerships, including public private partnerships, aimed at constructing, renovating, and/or expanding community-based services, as well as projects using a campus-type model that collocate multiple levels of care on the continuum, with a focus on residential treatment facilities.

If HCA is awarded the $300,050,000 in grant funds, it would be used for a collaborative partner project with the University of California, Irvine (UCI), aimed at expansion of beds and treatment slots to further expand the continuum of behavioral health services to Orange County residents.

In this partnership HCA is the primary applicant and UCI is the co-applicant for the Behavioral Health Campus project. The Behavioral Health Campus will be located in Irvine and is designed to meet the County shortage of inpatient psychiatric beds, resulting in a significant gap in the continuum of care for all residents. The acute adult psychiatric units will provide inpatient/outpatient treatment and diagnosis to adults during an acute mental health crisis. The dual diagnosis unit will address the needs of patients with substance use disorders (SUD) and other mental health conditions. A new hospital will offer ECT, TMS and other neuromodulatory and rapid acting therapies. A pharmacy, laboratory, and MRI to support ECT and other interventional treatments are included. A continuum of mental and behavioral healthcare services will exist in a single central location.

The new facility will increase inpatient psychiatric beds and offer a continuum of outpatient (treatment slots) psychiatric care. Increased bed counts will be the acute adult, dual diagnosis, child/adolescent, and gerontology/medical units.

Residents will no longer drive from one facility to another to receive their prescribed mental health care services. This campus will house UCI's psychiatry residency program where the expanded portfolio of services will help recruit and retain the next generation of highly skilled and diverse behavioral healthcare leaders.

If awarded the grant funds, HCA will return to your honorable Board of Supervises to request approval to accept funds.

Board Resolution Required?	Yes
Deputy County Counsel Name:	Massoud Shamel

Recommended Action(s)
(Please specify below)

1. Retroactively approve the action of the Health Care Agency Director, or designee, for applying to the California Department of Health Care Services for the Behavioral Health Continuum Infrastructure Program (BHCIP) Round 1, Launch Ready grant in the amount of $300,050,000.00 to develop collaborative projects designed to expand beds treatment slots.

2. Adopt the updated resolution for Bond Behavioral Health Continuum Infrastructure Program (BHCIP) Round 1: Launch Ready.

Department Contact:	List the name and contact information (telephone, email) of the person to be contacted for further information.
Ian Kemmer (714) 834-2160 ikemmer@ochca.com	
Name of individual attending the Board Meeting:	List the name of the individual who will be attending the Board Meeting for this Grant item:
Annette Mugrditchian	

A RESOLUTION OF THE ORANGE COUNTY BOARD OF SUPERVISORS, A POLITICAL SUBDIVISION OF THE STATE OF CALIFORNIA, ACTING THROUGH ITS AGENT, ORANGE COUNTY HEALTH CARE AGENCY, AUTHORIZING APPLICATION TO AND PARTICIPATION IN THE BEHAVIORAL HEALTH CONTINUUM INFRASTRUCTURE PROGRAM ("BHCIP")

RESOLUTION NO. _____

December 17, 2024

WHEREAS the California Department of Health Care Services, through its contractor Advocates for Human Potential, Inc., ("**Department**") has issued a Request for Applications, dated July 15, 2024 ("**RFA**"), for the BHCIP Round 1 (2024) Launch Ready Program ("**Program**"). The Department has issued the RFA for Program grant funds pursuant to California Welfare and Institutions Code sections 5965-5967.01 ("**Behavioral Health Infrastructure Bond Act of 2024**").

WHEREAS Orange County, a political subdivision of the State of California, acting through its agent Orange County Health Care Agency ("**Applicant**"), desires to apply for Program grant funds and has submitted an application for Program grant funds ("**Application**") to the Department for review and consideration.

WHEREAS the Department is authorized to administer BHCIP pursuant to Behavioral Health Infrastructure Bond Act of 2024. Program funding allocations are subject to the terms and conditions of the RFA, the Application, Program Funding Agreement ("**Program Funding Agreement**"), and all other legal requirements of the Program.

THEREFORE, IT IS RESOLVED THAT:

1. Applicant is hereby authorized and directed to submit an Application to the Department in response to the RFA, and to apply for Program grant funds in a total amount not to exceed **$300,050,000**.

2. If the Application is approved, Applicant is hereby authorized and directed to enter into, execute, and deliver a Program Funding Agreement for the total award amount, and all other documents required or deemed necessary or appropriate to secure the Program grant funds from the

Department and to participate in the Program, and all amendments there to (collectively, the "**Program Documents**").

3. Applicant acknowledges and agrees that it shall be subject to the terms and conditions specified in the Program Funding Agreement. Any and all activities, expenditures, information, and timelines represented in the Application are enforceable through the Program Funding Agreement. Funds are to be used for the allowable expenditures and activities identified in the Program Funding Agreement.

4. **Mr. Ian Kemmer, Director, Behavioral Health Services** (the "**Authorized Signatory**"), is hereby authorized to execute the Application and the Program Documents on behalf of Applicant for participation in the Program.

PASSED AND ADOPTED this _____ day of _____, 202_, by the following vote of the County's Board of Supervisors:

AYES: **[#_]** NAYES: **[#_]** ABSTAIN: **[#_]** ABSENT: **[#_]**

The undersigned, **Robin Stieler, Clerk of the Board of Orange County**, does hereby attest and certify that the foregoing is a true and full copy of a resolution of the County's governing body adopted at a duly convened meeting on the date above-mentioned, and that the resolution has not been altered, amended, or repealed.

SIGNATURE: _____ DATE: _____

NAME: _____ TITLE: _____

CEO-Legislative Affairs Office
Grant Authorization eForm

GRANT APPLICATION / GRANT AWARD

Today's Date:	December 10, 2024
Requesting Agency/Department:	Sheriff-Coroner
Grant Name and Project Title:	FY 2024 Edward Byrne Memorial Justice Assistance Grant (JAG) Program - Local Solicitation
Sponsoring Organization/ Grant Source: (If the grant source is not a government entity, please provide a brief description of the organization/foundation)	U.S. Department of Justice, Office of Justice Programs
Application Amount Requested:	$454,311
Application Due Date:	October 22, 2024
Board Date when Board Approved this Application:	October 8, 2024
Awarded Funding Amount:	$454,311
Notification Date of Funding Awarded:	December 4, 2024
Is this an Authorized Retroactive Grant Application/Award? No	
Recurrence of Grant:	Yes
If this is a recurring grant, please list the funding amount applied for and awarded in the past:	2019 - $401,800 2020 - $365,643 2021 - $427,301 2022 - $464,954 2023 - $500,787
Does this grant require CEQA findings?	No
What Type of Grant is this?	**Award** - Formula Program
County Match?	No
How will the County Match be fulfilled? (Please include the specific budget)	N/A
Will the grant/program create new part or full-time positions?	No
Purpose of Grant Funds:	Provide summary and brief background on why the Board of Supervisors should accept this grant application/award, and how the grant will be implemented.

The Edward Byrne Memorial Justice Assistance Grant (JAG) program aims to improve the functioning of the criminal justice system by providing support in various areas. This includes additional personnel, equipment, supplies, contractual support, training, technical assistance, and information systems. The Orange County Sheriff-Coroner Department will act as the County fiscal agent and submit a single application for all eligible jurisdictions receiving JAG allocation. These jurisdictions include Orange County (Sheriff), Anaheim, Buena Park, Costa Mesa, Fullerton, Garden Grove, Huntington Beach, La Habra, Irvine, Orange, Placentia, Santa Ana, Tustin, and Westminster.

Board Resolution Required? **Deputy County Counsel Name:**	No

Recommended Action(s) (Please specify below)
Authorize the Sheriff-Coroner or designee to accept the grant award of $454,311.00 on behalf of the County of Orange, for the FY2024 Edward Memorial Justice Assistance Grant program application and affiliated documentation to the Bureau of Justice Assistance Programs, Department of Justice.

Department Contact:	List the name and contact information (telephone, email) of the person to be contacted for further information.
Jordan Jenks, Grant Specialist (714) 834-2210 jjenks@ocsheriff.gov	
Name of individual attending the Board Meeting:	List the name of the individual who will be attending the Board Meeting for this Grant item:
Jordan Jenks	

Revision to ASR and/or Attachments

RECEIVED
2024 DEC 11 AM 11:06
CLERK OF THE BOARD
COUNTY OF ORANGE
BOARD OF SUPERVISORS

Date: **December 9, 2024**

To: Clerk of the Board of Supervisors

CC: County Executive Office

From: **Nicole Walsh, Senior Assistant County Counsel**

Re: ASR Control #: 24-000949, Meeting Date December 17, 2024, Item No. # 33

Subject: **ADOPT GENERAL PLAN AMENDMENT H20-01 (6TH CYCLE HOUSING ELEMENT)**

Explanation:

Since submission of the Housing Element for review and adoption by the Board, the Ninth Circuit Court of Appeals, on December 4, 2024, ruled on a case relevant to a portion of Program 8 in the County's Draft Housing Element. The case, *The Ohio House, LLC v. City of Costa Mesa, et al.* (*Ohio House*) Ninth Circuit Court of Appeals Case No. 22-56181 (December 4, 2024), which is certified for publication, upholds the City of Costa Mesa's Group/Sober Living Homes ordinances against facial challenges under the Federal Fair Housing Act, the California Fair Employment and Housing Act, and the California Planning and Zoning Law, alleging that the City's ordinances were discriminatory against the disabled.

The County had, at the direction of the Department of Housing and Community Development (HCD), included in Program 8, a program to address and significantly alter, the County's Group Home/Sober Living Home Ordinance. To secure a substantial compliance letter, HCD specifically required the following text be included in the County's draft Housing Element as part of Program 8:

"The County will revise the ordinances to allow all group and sober living homes as principally permitted uses in all mixed-use and multifamily zoning districts and to assure that any group home or sober living facility that operates as a single housekeeping unit are permitted in any zoning district. The definition of single housekeeping unit will be revised to eliminate the requirement that the residential activities occur on a nonprofit basis and that the residents share lease agreements or ownership. In addition, the standards for group and sober living homes in single family residential areas shall be objective and not unnecessarily constrain approval of group and sober living homes in that zoning district."

The County was required to implement this program by July 2025. Given the ruling in *Ohio House*, County Counsel and OC Development Services Recommend removing

this language in Program 8 and replacing it with new language as set forth in the new attachment and Recommended Action.

☒ Revised Recommended Action(s)

Revise Recommended Action No. 3 and add new Recommended Actions Nos. 4 and 5 as follows:

1. Find that Final Negative Declaration No. IP 22-0133 approved by the Board of Supervisors on September 27, 2022, and Addendum No. 1 to Negative Declaration No. IP 22-0133 approved by the Board of Supervisors on June 25, 2024 (Attachment A), prepared for Housing-Related Updates to the County of Orange General Plan and Comprehensive Zoning Code, adequately address the effects of the Housing-Related Updates, reflect the independent judgment of the County of Orange as lead agency and are approved for the proposed project based on the following additional findings:

    a. That the circumstances of the project are substantially the same and Negative Declaration No. IP 22-0133 and Addendum No. 1 to Negative Declaration No. IP 22-0133 adequately address the effects of the proposed project; no substantial changes have been made in the project.

    b. No substantial changes have occurred in the circumstances under which the project is being undertaken; and no new information of substantial importance to the project which was not known or could not have been known when the Negative Declaration No. IP 23-0133 and Addendum No. 1 to Negative Declaration No. IP 22-0133 were adopted has become known.

2. Conduct the public hearing.

3. Consider the matter. ~~and adopt Resolution (Attachment B) to adopt General Plan Amendment H20-01 (6th Cycle Housing Element).~~

4. *Direct Staff, prior to submission of the Housing Element to the Department of Housing and Community Development, to revise the Housing Element by striking language reflected in the redlines shown in Attachment B:* ~~Given HCDs guidance on County ordinances relating to Group and Sober Living Homes, the County will revise the ordinances to allow all group and sober living homes as principally permitted uses in all mixed-use and multi-family zoning districts and to assure that any group home or sober living facility that operates as a single housekeeping unit are permitted in any zoning district. The definition of single housekeeping unit will be revised to eliminate the requirement that the residential activities occur on a nonprofit basis and that the residents share lease agreements or ownership. In addition, the standards for group and sober living homes in single family residential areas shall be objective and not unnecessarily constrain approval of group and sober living homes in that zoning district.~~

    Stricken language will be replaced with new language as follows: "The County will review and may modify the group and sober living home ordinances in light of the decision in The Ohio House v. City of Costa Mesa, et al. Ninth Circuit Court of Appeals Case No. 22-56181 (December 4, 2024) and any subsequent relevant cases."

~~The County will revise the ordinances to allow all group and sober living homes as principally permitted uses in all mixed-use and multi- family zoning districts and to assure that any group home or sober living facility that operates as a single housekeeping unit are permitted in any zoning district. The definition of single housekeeping unit will be revised to eliminate the requirement that the residential activities occur on a nonprofit basis and that the residents share lease agreements or ownership. In addition, the standards for group and sober living homes in single family residential areas shall be objective and not unnecessarily constrain approval of group and sober living homes in that zoning district.~~

5. *Adopt Resolution (Attachment B) to adopt General Plan Amendment H20-01 (6th Cycle Housing Element) with the revisions directed herein.*

☐ Make modifications to the:

☐ Subject ☐ Background Information ☐ Summary ☐ Financial Impact

☒ Revised Attachments (attach revised attachment(s) and redlined copy(s)) New

Attachment:

Attachment B - Board of Supervisors Resolution and Exhibits – General Plan Amendment H20-01 (Housing Element)

Attachment B Redlines – Redlined Pages of Housing Element pages 95-96 (Pages 107-108 of 504 noted in footer), and page 265 (Page 277 of 504 noted in footer)

RESOLUTION OF THE BOARD OF SUPERVISORS OF
ORANGE COUNTY, CALIFORNIA
December 17, 2024

WHEREAS, the County of Orange has completed its Sixth Cycle Housing Element (2021-2029) (Exhibit A), as mandated by State law; and

WHEREAS, the California Department of Housing and Community Development (HCD) has determined the County's Sixth Cycle Housing Element to be substantially compliant with the requirements of State law (Exhibit B); and

WHEREAS, the Sixth Cycle Housing Element provides goals, policies, and objectives the County will pursue in order to meet its existing and projected housing needs for the Sixth Cycle (2021-2029 planning period), including a Land Inventory addressing the County's 10,406 unit allocation of the Regional Housing Needs Assessment (RHNA) assigned by Southern California Association of Governments (SCAG); and

WHEREAS, the Housing Element specifically (1) analyzes existing housing stock, projected housing needs, and availability of housing for special needs groups; (2) provides a Land Inventory (an inventory of land suitable for residential development); (3) identifies and analyzes potential and actual barriers to the construction of new housing units; and (4) identifies specific programs the County will undertake to achieve its stated goals and objectives; and

WHEREAS, the County's Land Inventory lists sites available for housing development during the Sixth Cycle Housing Element (2021-2029 planning period) and these sites are zoned to provide enough density to adequately accommodate the County's RHNA allocation of 10,406 new housing units at all income levels; and

WHEREAS, the Housing Element includes descriptions of the programs it will implement to ensure the housing needs of the Unincorporated area will be met during the Sixth Cycle 2021-2029 planning period, including how it will facilitate the construction of 10,406 new housing units; and

WHEREAS, previously-adopted amendments to the Land Use Element of the County's General Plan and Comprehensive Zoning Code, and Zone Changes to various parcels throughout the Unincorporated areas that will allow higher densities on sites designated for mixed-use and in high-density residential areas, will facilitate the development of affordable housing as outlined in the Housing Element; and

WHEREAS, in accordance with Government Code Section 65583.2, the County finds the existing uses on the sites identified in the Land Inventory to accommodate the lower income

RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the Sixth Cycle planning period; and

WHEREAS, the Deputy Director, OC Public Works, or designee, is hereby directed to submit the adopted County of Orange Sixth Cycle Housing Element, along with all necessary material, to HCD for its earliest action and certification as provided by law; and

WHEREAS, the Deputy Director, OC Public Works, or designee, is further directed and authorized to make all non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments requested by HCD to achieve a finding of substantial conformance with State Housing Element Law.

NOW, THEREFORE, BE IT RESOLVED THAT THIS BOARD:

1. Finds that Final Negative Declaration No. IP 22-0133 approved by the Board of Supervisors on September 27, 2022, and Addendum No. 1 to Negative Declaration No. IP 22-0133, approved by the Board of Supervisors on June 25, 2024 (Exhibit C), prepared for Housing-Related Updates to the County of Orange General Plan and Comprehensive Zoning Code, adequately address the effects of the Housing Related Updates, reflect the independent judgment of the County of Orange as lead agency and are approved for the proposed project based on the following additional findings:

    a. That the circumstances of the project are substantially the same and Negative Declaration No. IP 22-0133 and Addendum No. 1 to Negative Declaration No. IP 22-0133 adequately address the effects of the proposed project; no substantial changes have been made in the project.

    b. No substantial changes have occurred in the circumstances under which the project is being undertaken; and no new information of substantial importance to the project which was not known or could not have been known when the Negative Declaration No. IP 23-0133 and Addendum No. 1 to Negative Declaration No. IP 22-0133 were adopted has become known.

2. Finds that draft General Plan Amendment H20-01 (Housing Element), the County of Orange Sixth Cycle Housing Element (2021-2029), complies with all of the requirements set forth in Government Code Section 65583.

3. Finds that substantial evidence in the record, as described in detail in Appendix B of the Housing Element, and based on eight criteria (vacant/minimal improvements; existing uses that are typical for redevelopment projects in the

County; improvement/land value comparison; building/site condition; location; development demand for the identified sites; expressed interest from developers; and past residential and mixed-use development trends) demonstrates that the existing uses on the non-vacant sites identified in the site inventory to accommodate the County's lower income RHNA are likely to be discontinued during the planning period and or otherwise do not constitute an impediment to planned residential development on the site during the planning period.

4. Adopts General Plan Amendment H20-01 (Housing Element) as the County of Orange Sixth Cycle Housing Element (2021-2029).

Exhibit A County of Orange Sixth Cycle Housing Element (2021-2029) – Adopted November 2024
Exhibit B State HCD comment letter received on September 28, 2023
Exhibit C Final Negative Declaration No. IP 22-0133 and Addendum No. 1 to Negative Declaration No. IP 22-0133

DRAFT





County of Orange

Housing Element

2021 - 2029

ADOPTION DRAFT | NOVEMBER 2024



DRAFT – NOVEMBER 2024

COUNTY OF ORANGE
2021-2029
HOUSING ELEMENT

Table of Contents

1. INTRODUCTION 1

Purpose 1

Citizen Participation 2

Consistency with State Housing and Planning Law 2

General Plan Consistency 3

Housing Element Organization 4

2. COMMUNITY PROFILE 5

Population Trends and Characteristics 5

Employment Trends 10

Household Characteristics and Trends 15

Housing Inventory and Market Conditions 24

Housing Cost 33

Housing Needs 39

Overcrowding and Overpayment 40

County Programs to Encourage Development of Affordable Housing 45

Future Growth Needs 53

Special Housing Needs 55

3. CONSTRAINTS 82

Governmental Constraints 82

Development Processing Procedures 98

Non-Governmental Constraints 113

4. AFFIRMATIVELY FURTHERING FAIR HOUSING 123

Fair Housing Outreach and Enforcement Capacity 125

Analysis of Federal, State, and Local Data and Local Knowledge 130

Integration & Segregation Patterns & Trends Related to People With the Following Protected Characteristics and Lower Incomes 132

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) 153

Disparities in Access to Opportunity 156

Disproportionate Housing Needs and Displacement 175

Discussion of Site Inventory Related to People with Protected Characteristics, Lower Incomes, and Opportunity Areas 206

Summary of Fair Housing Issues/Assessment of Contributing Factors to Fair Housing 243

5. HOUSING ACTION PLAN 246

Strategies 247

Programs, Objectives, Responsible Agencies, Funding Sources 247

Summary of Quantified Objectives 284

APPENDIX A: EVALUATION OF THE 2013-2021 HOUSING ELEMENT A-1

APPENDIX B: LAND INVENTORY B-1

APPENDIX C: PUBLIC PARTICIPATION SUMMARY C-1

Glossary

The following terms are used throughout this document and include common geographical terms as well as general and planning terms:

Term or Abbreviation	Definition
Above moderate-income households	Households with an income that is 120% or more of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $153,351 or more for a four-person household, as calculated by HCD for 2023 (this is more than 120% of the $127,800 AMI for Orange County).
Accessory Dwelling Unit or "ADU"	A dwelling unit providing complete independent living facilities for one or more persons that is located on a parcel with another primary, single-family dwelling or multifamily use defined by Government Code section 65852.2, as may be amended. Must include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling's location. An accessory dwelling unit may be within the same structure as the primary unit, in an attached structure, or in a separate structure on the same parcel.
AFFH	Affirmatively Furthering Fair Housing – a legal requirement that federal agencies and federal grantees further the purposes of the federal Fair Housing Act. This term 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."
Affordable housing unit	A residential dwelling unit which shall be reserved for rent or sale to eligible households based upon housing cost and household income levels at extremely low-, very low-, low-, or moderate income as established by the California Department of Housing and Community Development (HCD) or U.S. Department of Housing and Urban Development (HUD).
AI	Orange County Analysis of Impediments to Fair Housing, 2020
AMI	Area Median Income – the median income for the County of Orange as a whole, unless otherwise limited in the document to Unincorporated Census Designated Places (CDPs) and other Unincorporated areas. The methodology for determining the AMI may be different between governmental entities so the AMI may be reported differently among tables.
Assisted Housing	Generally, refers to multifamily rental housing, but may sometimes include single-family owner-occupied units, whose construction, financing, sales price, or rent have been subsidized by federal, state, or local funding programs benefitting very low-, low-, or moderate-income households.
CDBG	Community Development Block Grants – A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitled communities, which allots money to cities and counties for housing rehabilitation and community development, including public facility and economic development.
Census Designated Place or "CDP"	Statistical equivalents of incorporated places representing Unincorporated communities that do not have a legally defined boundary that are designated by the U.S. Census Bureau. For purposes of this 6th Cycle Housing Element, the Unincorporated CDPs relevant to the County include Coto de Caza, Ladera Ranch, Las Flores, Midway City, Modjeska, North Tustin, Rancho Mission Viejo, Rossmoor, Silverado, Trabuco Canyon, and Williams CDPs. While these CDPs

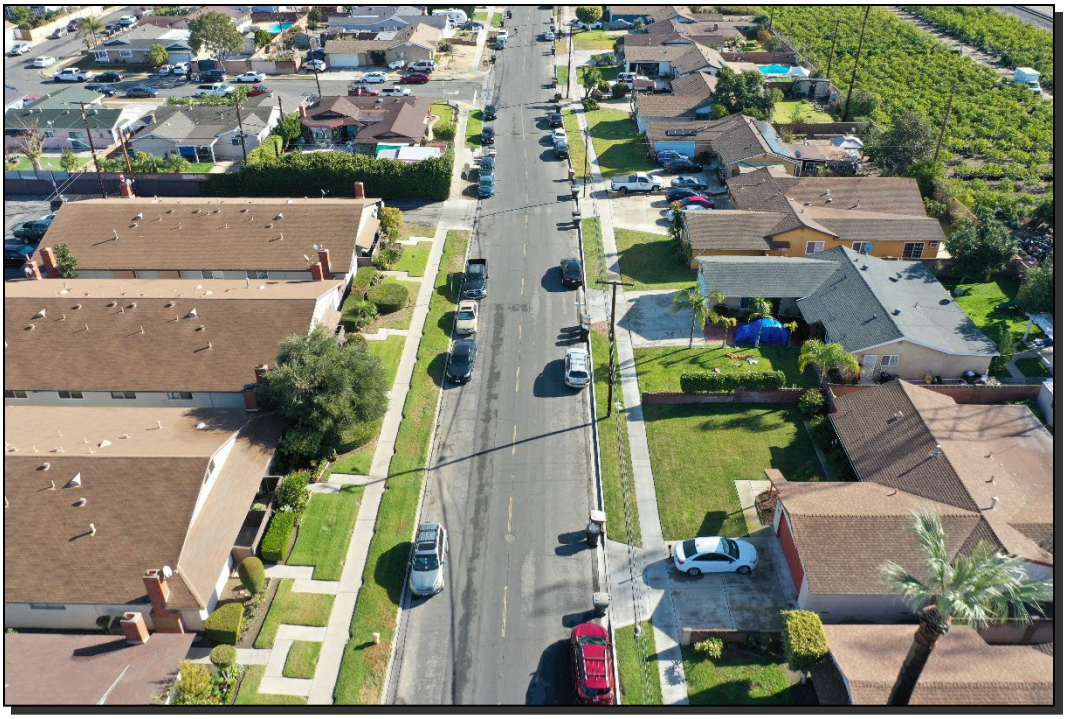
Term or Abbreviation	Definition
	do not make up the entire population of the Unincorporated areas, data from these CDPs was used when data for the entirety of the Unincorporated areas of the County was unavailable. In some instances, census tract data from El Modena, West Anaheim, Orange-Olive, and Stanton is also included because these locations are not part of any CDPs for Unincorporated Orange County, but adding such data provides a more complete data set.
CHAS	The Comprehensive Housing Affordability Strategy data compiled by the U.S. Department of Housing and Urban Development
Continuum of Care or "CoC"	The County's comprehensive regional strategy intended to address homelessness in Orange County, which covers the 34 incorporated jurisdictions, as well as the Unincorporated areas. The CoC is guided by a Board, with participation from County departments and agencies, local governments, homeless, housing, and supportive service providers, community groups, and many other stakeholders. The CoC serves as a means of regional coordination between the various stakeholders to better address homelessness issues on a community-wide level, advocates for funding and resources, provides funding for efforts to quickly rehouse people experiencing homelessness, promotes access to existing programs for homeless individuals and families, and promotes the implementation of best practices and evidence-based approaches to homeless programming and services.
County of Orange or "County"	Includes only Unincorporated Areas of Orange County. The Goals, Strategies, and Actions in the Housing Action Plan apply only to the County.
Density	The amount of development per acre permitted on a parcel under the applicable zoning (inclusive of any overlay zoning), commonly measured as dwelling units per acre (du/ac). Where the County's Housing Opportunities Overlay permits a higher residential density than would otherwise be allowed, the density specified by the Housing Opportunities Overlay governs.
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, generally in exchange for meeting certain requirements (e.g., specified percentage of affordable housing).
Dwelling Unit or "DU"	One or more rooms designed, occupied, or intended for occupancy as separate living quarters
Emergency Shelter	As defined by Section 50801 of the California Health and Safety Code, as may be amended, housing with minimal supportive services for persons experiencing homelessness that is limited to occupancy of one-hundred eighty consecutive days or less and from which no individual or household may be denied emergency shelter because of an inability to pay. This classification includes facilities that provide temporary shelter, meals, showers, and other related services to persons experiencing homelessness and where on-site supervision is provided whenever the shelter is occupied.
Extremely low-income households	Households with an income that is between 15% and 30% or less of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $43,050 for a four-person household, as calculated by HCD for 2023 (this is 30% of the $127,800 AMI for Orange County).
Fair Market Rent	The rent, including utility allowances, determined by the U.S. Department of Housing and Urban Development (HUD) for the purpose of administering the Section 8 Housing Assistance Program.
General Plan	A comprehensive, long-term plan mandated by State Planning Law for the development of a city or county and any land outside its jurisdictional

Term or Abbreviation	Definition
	boundaries, which, in the local jurisdiction's judgment, bears relation to its planning. General Plans consist of seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. General Plans include a statement of development policies for the jurisdiction and serves as a guiding document for development decisions.
HCD	California Department of Housing and Community Development – The State agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of low- and moderate-income households.
Household	Includes all people occupying a single dwelling unit. A household also means all people occupying two dwelling units on the same site if both units are used as group homes owned or operated by the same operator.
Housing Opportunities Overlay or "HOO"	A zoning overlay district within the County that provides for the development of affordable rental housing within commercial and/or industrial districts, and on building sites zoned for high density residential uses, and for the establishment of emergency shelters, multi-service centers and low-barrier navigation centers. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning, so long as all housing units are reserved for households which earn eighty percent or less of the County median income, and seventy percent of the units are reserved for low-income-households and thirty percent of the units are reserved for very low-income households.
HUD	U.S. Department of Housing and Urban Development – The Federal department that administers housing and community development programs nationwide.
Jobs-Housing Balance	A ratio that describes the adequacy of the housing supply within a defined area in terms of meeting the needs of persons who work within the same defined area.
Junior Accessory Dwelling Unit or "JADU"	Pursuant to Government Code Section 65852.22, as may be amended, a junior accessory dwelling unit means a unit that is no more than five hundred (500) square feet in size and contained entirely within an existing or proposed single-family dwelling unit. A junior accessory dwelling unit shall include an efficiency kitchen (sink, cooking appliance, food preparation counter, and storage cabinets) and may include separate sanitation facilities, or may share sanitation facilities with the existing structure
Low-income households	Households with an income that is between 51% and 80% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For the Orange County, this income limit is $114,800 for a four-person household, as calculated by HCD for 2023 (this is approximately 80% of the $127,800 AMI for Orange County).
Median Family Income or "MFI"	Median Family Income as calculated for the relevant area by the U.S. Department of Housing and Urban Development (HUD) for each jurisdiction, to determine the Fair Market Rents and income limits for HUD programs. MFI is not necessarily the same as other calculations of median incomes (e.g., a simple census number) due to a series of adjustments that are made by HUD.
Mixed-Use	A development that combines both residential and non-residential uses on the same lot.
Moderate-income households	Households with an income that is between 81% and 120% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $153,350 for a four-person household, as calculated by HCD for 2023 (this is 120% of the $127,800 AMI for Orange County).

Term or Abbreviation	Definition
Multifamily building	A detached building designed and used exclusively as a dwelling by three or more households occupying separate dwelling units.
Multifamily dwelling	Two (2) or more dwelling units within a single building or within two (2) or more buildings on the same site or lot. Types of multifamily dwellings include garden apartments, senior citizen housing developments, apartments, and condominium buildings.
OCTA	Orange County Transportation Authority, the regional transportation authority for planning and operation of transportation and transit within Orange County.
OCHFT	Orange County Housing Finance Trust – a joint powers authority between the County and multiple incorporated cities for the purpose of funding housing that specifically aims to address the needs of the homeless population, and extremely low-, very low-, and low-income households within Orange County.
Ordinance	A law or regulation set forth and adopted by the County's Board of Supervisors. These are generally codified into the County's Codified Ordinances after adoption.
Overcrowded Housing Unit	A housing unit which is occupied by more than one person per room, as defined by the U.S Census Bureau.
Overlay	A regulatory tool that creates a special zoning district, placed over an existing base zoning district. The regulations applicable to the overlay can either supplement or override the regulations for the base zoning district, and its boundaries can either share common boundaries with the base zoning district or cut across base zoning district.
Parcel	A lot or tract of land
Planning Area	The area addressed by a General Plan. For the County's purposes, the Planning Area for this 6th Cycle Housing Element encompasses all of the Unincorporated areas within the County's jurisdictional limits.
RCOC	Regional Center of Orange County, a nonprofit organization contracted by the State to coordinate lifelong services and support for individuals with developmental disabilities and their families.
Regional	Pertaining to activities at a scale greater than that of a single jurisdiction and affecting a broader geographic area.
Regional Housing Needs Assessment or "RHNA"	A quantification by the local council of governments of existing and projected housing need, by household income group, for all localities within a region.
R/ECAP	Racially or Ethnically Concentrated Areas of Poverty
Residential Zoning	Land designated in the General Plan and Zoning Ordinance as allowing for the development of residential uses, including the residential uses authorized by the Housing Opportunities Overlay zone.
SCAG	Southern California Association of Governments – the regional council of governments responsible for allocating the RHNA quantification to individual jurisdictions within the region.
Single-family Dwelling	A dwelling unit designed for occupancy by one household that is located on a single lot. May either be detached (meaning that the lot does not contain any other dwelling unit except for an accessory dwelling unit or junior accessory dwelling unit where permitted and is not connected to another dwelling unit) or attached (meaning that it shares a common wall with another single-family dwelling).

Term or Abbreviation	Definition
Supportive Housing	Housing with no limit on length of stay, that is occupied by the target population for the housing as identified by the provider, 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. Supportive housing may be provided in single-family dwelling, multifamily dwelling units, residential care facilities, or boarding house uses.
Tenure	This refers to the type of occupancy for a given dwelling unit – that is, whether it is owner-occupied or renter-occupied. Dwelling units that are not owner occupied and are either rented for cash rent or occupied without payment of cash rent are classified as renter occupied.
Transitional Housing	As defined by Government Code section 65582, as may be amended, dwelling units with a limited length of stay that are operated under program requirements that require the termination of assistance and recirculation of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six (6) months from the beginning of the assistance. Transitional housing projects may be designated for homeless or recently homeless individuals or families transitioning to permanent housing. Transitional housing may be provided in a variety of residential housing types including single-family and multifamily dwellings.
Unincorporated CDPs	The pre-2020 CDPs that comprise the majority of the Unincorporated areas include Coto de Caza, Ladera Ranch, Las Flores, Midway City, North Tustin, and Rossmoor. While these CDPs do not comprise the entirety of the Unincorporated areas, data from these CDPs was used where data for the entirety of the Unincorporated areas was unavailable. In 2020, five new CDPs were created in the Unincorporated areas: Modjeska, Rancho Mission Viejo, Silverado, Trabuco Canyon, and Williams Canyon. Data from these new CDPs were included when appropriate.
Very low-income households	Households with an income that is between 31% and 50% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For the Orange County, this income limit is $71,750 for a four-person household, as calculated by HCD for 2023 (this is 50% of the $127,800 AMI for Orange County).
Zoning Ordinance or Zoning Code	The Comprehensive Zoning Code of the County of Orange, including zoning district maps and planned community or specific plan development plan maps and texts adopted pursuant to or as an amendment to Orange County Codified Ordinances sections 7-9-25.1, 7-9-47, 7-9-132, and 7-9-133. The Zoning Code is contained in Orange County Codified Ordinances sections 7-9-19 through 7-9-713.

1. INTRODUCTION



Purpose

The purpose of the Housing Element is to ensure the County establishes policies, procedures, and incentives in its land use planning and development activities that will result in the maintenance and expansion of the housing supply to adequately accommodate households current and future population living and expected to live in the Unincorporated County. It institutes policies that will guide County decision-making and establishes an action program to implement housing goals through 2029.

Each jurisdiction within the Southern California Association of Governments (SCAG) region is required to adopt its 2021-2029 Housing Element by October 15, 2021. Although some County housing programs operate within cities, the County's Housing Element primarily addresses housing issues in the Unincorporated County areas. Foremost among these issues is the provision of a mix of housing types to meet the needs of all economic segments of the Unincorporated County areas. In response, the Housing Element makes provisions for affordable and accessible housing for special needs groups in the community and is designed to provide guidance in the maintenance of existing affordable housing. These commitments are an expression of the statewide housing goal of "decent housing and a suitable living environment for every California family."

Citizen Participation

The *California Government Code* requires that local government make a diligent effort to achieve public participation from all economic segments of the community in the development of the Housing Element. In the preparation of the Housing Element Update, a number of organizations and agencies that provide housing, or housing related services, were contacted. Responses from these groups helped guide the Housing Needs Assessment portion of the Housing Element, as well as the Housing Action Plan.

Citizen involvement was accomplished in a number of different ways. Meetings were held with the County Housing Element Resource Team comprised of recognized leaders from business, housing advocacy, social service providers, non-profit organizations, the Building Industry Association, major landowners and developers, and non-profit builders. The Draft Housing Element was posted on the County's website to facilitate public access and comments. (https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2). Community workshops were hosted by OC Development Services, and public hearings were held by the Orange County Planning Commission and Board of Supervisors. Additionally, prior to submitting to the California Department of Housing and Community Development (HCD), the County made the Draft Housing Element available for a 30-day public review and comment period. Following the 30-day public review and comment period, the County utilized a 10-day period to review and incorporate any necessary changes to the document. This proactive outreach effort ensured broad involvement throughout the analytical and policy development phases of the project.

For subsequent draft revisions, the draft revision was made available on the County website and an email with a link to the document was sent to all individuals and organizations that previously requested notices relating to the County's Housing Element at least seven days prior to submitting the draft revision to HCD.

Appendix C provides additional detail regarding opportunities for public involvement along with a summary of public comments and how those comments have been addressed in the Housing Element.

Consistency with State Housing and Planning Law

The Housing Element is one of the seven General Plan elements mandated by the State of California. Sections 65580 to 65590 of the *California Government Code* contain the legislative mandate for the housing element. State law requires that the County's Housing Element consist of "*an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement and development of housing*" (§65583). In addition, the housing element shall identify adequate sites for housing, including rental housing, factory-built housing,

and mobile homes, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

There is no single approved format for a Housing Element. Instead, State law defines components of issues that must be addressed. A Housing Element should clearly identify and address, at a minimum, each component listed below:

The Housing Element shall contain all of the following.

1. Review of existing Housing Element.
2. An assessment of existing and projected housing and employment trends to assess a locality's housing needs for all income levels.
3. An inventory of resources relevant to meeting housing needs.
4. An inventory of constraints relevant to the meeting of these needs.
5. A statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing.

A program that sets forth an eight-year schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element.

General Plan Consistency

The Housing Element is one of nine elements of the Orange County General Plan. The goals, policies, standards, and proposals within this Element relate directly to, and are consistent with all other Elements. The County's Housing Element identifies programs and resources required for the preservation, improvement, and development of housing to meet the existing and projected needs of its population.

The Housing Element is affected by development policies contained in the Land Use Element, which establishes the location, type, intensity, and distribution of land uses throughout the County, and defines the land use build-out potential. In designating the location and density of residential development, the Land Use Element places an upper limit on the number and types of housing units constructed in the Unincorporated County. The acreage designated for a range of commercial and office uses creates employment opportunities for various income groups. The presence and potential for jobs affect the current and future demand for housing at various income levels in the County.

The Public Services and Facilities Element, Resources Element, Safety Element, and Noise Element of the General Plan also affect the implementation of the Housing Element. Together, these Elements establish policies for providing essential infrastructure to all housing units, regulate the amount and variety of open space and recreation areas, delineate acceptable noise levels in residential areas, and establish programs to provide for the safety of the residents. In

sum, policies contained in General Plan Elements directly affect the quality of life for all Unincorporated County citizens.

The Eight-Year Housing Action Plan contained in Section 5 (Housing Action Plan) includes the County's commitments for implementation actions through October 2029.

Housing Element Organization

The Housing Element is comprised of the following major components:

- The Community Profile and Needs Assessment (Section 2) contains an overview of the county's population, housing, and employment characteristics in the context of regional trends, as well as a discussion of existing and future housing needs, including special needs such as the elderly and large families, and the Unincorporated County areas' fair share of regional growth needs.
- Section 3 contains a review of housing constraints and resources, including governmental and market constraints to the maintenance, improvement, and development of housing.
- Section 4 contains a review of Affirmatively Fair Housing and disparities in access to opportunity within incorporated and Unincorporated areas of Orange County.
- The goals, policies, and programs that will guide the County's actions through 2029 are presented in Section 5.
- Appendix A presents a review of the previous Housing Element, including a discussion of the appropriateness of goals and policies, the effectiveness of programs, and the progress in achieving quantified objectives.
- Appendix B presents an analysis and inventory of suitable sites for housing development compared to the jurisdiction's assigned share of the region's housing need.
- Engagement efforts including community workshops, meetings, online and digital outreach, and public hearings are discussed in Appendix C.

2. COMMUNITY PROFILE

The County of Orange is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. A somewhat rectangular landmass, Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles. Unincorporated Orange County represents only a small fragment of the total population of Orange County. The population of the Unincorporated County areas was only 128,421 in 2020, representing less than 5% of the population of Orange County as a whole.

The housing needs of the County are determined by demographic characteristics of the population (age, household size, employment, and/or ethnicity), and the characteristics of housing available to that population (e.g., number of units, tenure, size, cost). The regional housing market is seldom static, constantly changing with dynamic social and economic factors. As County demographics and household socioeconomic conditions change, different housing opportunities arise and/or must be created to meet demand. This section explores the characteristics of the existing and projected population and housing stock in order to define the extent of unmet housing needs in the Unincorporated County. This information helps to provide direction in updating the County's Housing Element goals, policies, and programs.

Population Trends and Characteristics

Between 2000 and 2020, Orange County as a whole, grew by over 348,000 people, or approximately 12%. During this same time period, the population of the Unincorporated County areas declined by about 23.6% to 128,421 persons (**Table 2-1**) due to incorporations and annexations of approximately 20% of Unincorporated land.

Table 2-1
Population Trends 2000-2020

Jurisdiction	2000	2010	2020	Growth 2000 to 2020	
Aliso Viejo	0	47,816	50,351	50,351	5%
Anaheim	328,014	336,265	357,059	29,045	9%
Brea	35,410	39,182	45,498	10,088	28%
Buena Park	77,962	80,520	82,336	4,374	6%
Costa Mesa	108,724	109,960	113,667	4,943	5%
Cypress	46,549	47,802	49,055	2,506	5%
Dana Point	35,110	33,351	33,466	-1,644	-5%
Fountain Valley	54,978	55,313	55,419	441	1%
Fullerton	126,003	135,222	142,070	16,067	13%
Garden Grove	165,196	170,794	173,457	8,261	5%
Huntington Beach	189,627	189,992	198,725	9,098	5%
Irvine	143,072	212,375	277,988	134,916	94%
Laguna Beach	23,727	22,723	22,690	-1,037	-4%
Laguna Hills	29,891	30,270	31,397	1,506	5%
Laguna Niguel	61,891	62,979	64,559	2,668	4%
Laguna Woods	17,794	16,273	16,209	-1,585	-9%
La Habra	58,974	60,223	63,471	4,497	8%
Lake Forest	58,707	77,395	84,556	25,849	44%
La Palma	15,408	15,568	15,607	199	1%
Los Alamitos	11,536	11,449	11,602	66	1%
Mission Viejo	93,102	93,174	95,130	2,028	2%
Newport Beach	70,032	85,186	86,415	16,383	23%
Orange	128,868	136,386	139,504	10,636	8%
Placentia	46,488	50,598	51,569	5,081	11%
Rancho Santa Margarita	47,214	47,853	48,708	1,494	3%
San Clemente	49,936	63,522	64,538	14,602	29%
San Juan Capistrano	33,826	34,593	36,081	2,255	7%
Santa Ana	337,977	324,647	331,304	-6,673	-2%
Seal Beach	24,157	24,168	24,711	554	2%
Stanton	37,403	38,186	39,150	1,747	5%
Tustin	67,504	75,540	80,511	13,007	19%
Villa Park	5,952	5,812	5,821	-131	-2%
Westminster	88,207	89,701	91,931	3,724	4%
Yorba Linda	58,918	64,234	68,426	9,508	16%

Table 2-1
Population Trends 2000-2020

Jurisdiction	2000	2010	2020	Growth 2000 to 2020	
Unincorporated Areas	168,132	121,160	127,510	-40,622	-24%
County Total	2,846,289	3,010,232	3,180,491	334202	12%

**California State Department of Finance, E-4 Report, 2001-2010, with 2000 & 2010 Census Counts*
***California State Department of Finance, E-5 Report, 2011-2020, with 2010 Benchmark*

Most cities within Orange County generally experienced some growth, though not exponential, between 2000 and 2020. However, within the Unincorporated County areas the population shrunk by nearly a quarter because annexations and incorporations physically shrunk the size of the Unincorporated County areas over that period, pulling the population of those annexed and incorporated areas into neighboring jurisdictions. The Board of Supervisors Policy Platform includes policy direction to County staff to encourage annexation of Unincorporated islands. This created higher population growth in neighboring jurisdictions over the last twenty years. The Unincorporated County area's population shrank as a percentage of the total population of Orange County from 2000 to 2020, decreasing from approximately 5.9% of the overall population of Orange County as a whole to approximately 4% of the overall population of Orange County. This decrease in population both in terms of total numbers and in terms of a percentage of the total population of Orange County mirrors the decrease in the Unincorporated County areas' land area during the same period and reflects a trend of both decreasing jurisdictional area for the County and decreasing population within the Unincorporated County areas due to annexations and other factors.

Age Composition

The age breakdown of a population is an important factor in evaluating housing needs and projecting the direction of future housing development. According to the 2010 and 2021 American Community Survey (ACS) data shown in **Table 2-2**, residents in their prime working years (20-64) comprised about 57% of the population of the Unincorporated County areas in 2010, shrinking just slightly to comprise about 56.5% of the population of the Unincorporated County areas in 2021. About 13.9% of residents were "senior citizens" age 65 and older in 2010, with this number growing to encompass approximately 14.3% of the population in the Unincorporated County areas in 2021. This demonstrates an aging population, in line with the trends observed in Orange County as a whole. The median age of persons living in census designated places in Orange County increased between 2010 to 2019, except for the Las Flores Census Designated Place (CDP), which decreased by about 1% (**Table 2-3**). The median age in most Unincorporated CDPs increased between 2010 and 2020, with the largest increases in median age observed in the Coto de Caza CDP (increasing from 42.2 to 46.2) and North Tustin CDP (increasing from 45.6 to 48.6). The Trabuco Canyon, Coto de Caza, North Tustin,

Silverado, and Rossmoor CDPs are the Unincorporated County areas with the highest median age, with the Ranch Mission Viejo, Las Flores, and Ladera Ranch CDPs having the lowest median age. As a whole, the median age in Orange County increased from 36.2 to 37.8 between 2010 to 2020. During the 2010-to-2021-time frame, residents between 0 and 5 years of age demonstrated the largest amount of growth for CDPs within the Unincorporated County areas. Additionally, the percentage of the population falling between the ages of 5 and 49 decreased slightly between 2010 and 2021. This indicates that families residing within the Unincorporated County areas have grown over the last decade, with adults over the age of 50 and children under the age of 5 representing growing segments of the population. In line with these population trends, there is growth in demand for housing suitable for larger family units (that is, multi-bedroom units and/or single-family residences) and multi-generational housing.

Table 2-2
Age Distribution - Unincorporated Census Designated Places (CDPs)

Years	Under 5 years	5 to 19 years	20 to 34 years	35 to 49 years	50-64 Years	65 years +
2010	4.8%	24.5%	11.5%	24.5%	21%	13.9%
2015	5.4%	21.4%	14.1%	20.5%	23.1%	15.7%
2021	6.1%	23.2%	13.1%	21.4%	22%	14.3%

Source: American Community Survey, 5-year Estimates, 2010, 2015, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area

Table 2-3
Median Age by Unincorporated Census Designation Places (CDPs)

Census Designated Place (CDP)	2010	2020
Orange County	36.2	38.3
Coto de Caza CDP	42.2	46.2
Ladera Ranch CDP	32.4	35.2
Las Flores CDP	33.2	32.1
Midway City CDP	37.1	40.3
Modjeska CDP	N/A	38.3
North Tustin CDP	45.6	48.6
Rancho Mission Viejo CDP	N/A	35.2
Rossmoor CDP	45.5	47.5
Silverado CDP	N/A	54.1
Trabuco Canyon CDP	N/A	51
Williams Canyon CDP	N/A	37.6

Source: American Community Survey, 5-Year Estimates, 2019, 2020.
Note: Median age data available for Unincorporated CDPs only, not entire Unincorporated County area.
Note: Modjeska, Rancho Mission Viejo, Silverado, Trabuco Canyon, and Williams Canyon became CDPs in 2020.

Racial and Ethnic Composition

Table 2-4 shows a comparison from 2010 to 2020 of racial and ethnic characteristics for Orange County as a whole, while **Table 2-5** shows a comparison from 2010 to 2020 of racial and ethnic characteristics for the Unincorporated County.

Table 2-4
Racial and Ethnic Breakdown for Orange County
Comparison 2010 and 2020

	White	Hispanic or Latino of Any Race	Asian	Two or More Races	Black	Native Hawaiian and Pacific Islander	American Indian/ Alaska Native	Some Other Race	Total Population
2010	1,328,499	1,012,973	532,477	72,117	44,000	8,357	6,216	5,593	3,010,232
2020	1,198,655	1,086,834	699,124	125,242	49,304	7,714	5,298	14,818	3,186,989
Change	-129,844	73,861	166,647	53,125	5,304	-643	-918	9,225	176,757
% Change 2010 to 2020	-9.80%	7.3%	31.30%	74%	12.1%	-7.7%	-14.8%	165%	5.9%

Source: U.S. Census Bureau, 2010 and 2020 Public Law 94-171 Summary Files. Errata not included.

Table 2-5
Racial and Ethnic Breakdown for Unincorporated Orange County
Comparison 2010 and 2020

	White	Hispanic or Latino of Any Race	Asian	Two or More Races	Black	Native Hawaiian and Pacific Islander	American Indian/ Alaska Native	Some Other Race	Total Population
2010	75,535	25,333	15,034	3,301	1,170	293	279	215	121,160
2020	73,595	29,195	20,936	6,792	1,364	235	200	560	132,877
Change	-1,940	3,862	5,902	3,491	194	-58	-79	345	11,717
% Change 2010 to 2020	-2.6%	15.2%	39.3%	106%	17%	-20%	-28.3%	160%	9.7%

Source: U.S. Census Bureau, 2010 and 2020 Public Law 94-171 Summary Files. Errata not included.

As **Tables 2-4** and **2-5** demonstrate, since 2010, the County's housing needs have become more complex as the population has become more diverse. Population data suggests a growing demand for senior housing, along with programs to assist lower-income seniors who wish to "age in place" by adapting their homes to their housing needs. Moreover, population data suggests a more diverse Orange County as a whole, which in turn, likely requires more diverse housing options.

Employment Trends

Current employment and projected job growth have a significant influence on housing needs during this planning period. **Table 2-6** shows that about 65.6% of working-age persons in the entire County were in the workforce, with a similar number of persons in the workforce in Unincorporated CDPs, as reported by 2019 American Community Survey estimates. About 6% of Orange County and Unincorporated CDP residents worked at home, and 34% were not in the labor force (i.e., unemployed, or not seeking work). However, the number of residents working from home has changed since 2019 most likely due to the 2020 pandemic.

Table 2-6
Labor Force – Unincorporated CDPs and Orange County

	Unincorporated CDPs						Orange County					
	2010		2019		2021		2010		2019		2021	
	Persons	%	Persons	%	Persons*	%	Persons	%	Persons	%	Persons	%
In labor force	40,140	65.7%	45,172	64.4%	52,907	65.6%	1,559,264	67.3%	1,671,054	65.6%	1,690,622	65.8%
-Work at home	2,859	4.7%	4,401	6.3%	9,375	11.6%	66,404	2.9%	99,736	3.9%	191,060	7.4%
Not in labor force	20,932	34.3%	24,934	35.6%	27,793	34.4%	756,518	32.7%	877,328	34.4%	877,148	34.2%
-With social security income	6,335	10.4%	7,513	10.7%	9,095	11.3%	227,427	9.8%	278,565	10.9%	285,401	11.1%
Total Population age 16+	61,072	100%	70,106	100%	80,700	100%	2,315,782	100%	2,548,382	100%	2,567,770	100%

Source: American Community Survey, 5 year estimate, 2010, 2019, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.
**Increase in number of persons due to additional CDPs created in 2020.*

In 2022, the Orange County Transportation Authority (OCTA) released the results of an *Employment and Travel Tracking Survey* intended to measure how the 2020 pandemic altered attitudes, working arrangements, travel behaviors, and preferred mode of trips. A baseline study was conducted in February and June 2020, and two tracking studies were conducted in September 2021 and September 2022. These studies did not differentiate between people residing in incorporated cities versus within the Unincorporated County areas, however, the trends observed are likely similar between both incorporated jurisdictions and the Unincorporated County areas. The key takeaways from the study are: 1) the pandemic had dramatic impacts on employment, working arrangements, and travel behavior, 2) Orange County has reached a new normal for remote work which doubled from pre-pandemic levels, and 3) travel and activity patterns stabilized between August 2021 and 2022.
During the early months of the pandemic:

- Unemployment increased from 4% to 18% between February and June 2020.
- Working exclusively from home increased from 12% to 47%.
- Working from home increased from .76 days/week to 2.56 days/week.

By September 2022:

- The percentage working from home 1 or more days/week settled in at 43%, an increase from 23% in February 2022.
- The average number of days working from home (1.49) is double pre-pandemic levels (.76).
- With the decline in remote work from the early months of the pandemic, the percentage of employees driving alone to work increased from 60% in September 2021 to 69% in September 2022.

Link to the OCTA Survey:

https://blog.octa.net/posts/remote-work-in-orange-county-has-doubled-since-pandemic-says-survey/

Consistent with those findings, the Unincorporated County areas reported an increase in employed persons working from home in 2021, as compared to both 2010 and 2019.

In 2018, approximately 52.3% of the Unincorporated working residents were employed in management and professional occupations (**Table 2-7**). A significant number of workers (24.6%) were employed in sales and office related occupations. A relatively low proportion of workers (11.5%) were employed in service-related occupations. Blue collar occupations such as machine operators, assemblers, farming, transportation, handlers, and laborers constituted about 11.6% of the workforce. Numbers in Orange County as a whole are similar.

Table 2-7
Employment by Occupation

Occupation	Unincorporated Areas		Orange County		SCAG Region	
	Persons	%	Persons	%	Persons	%
Management, professional and related	32,503	52.3%	658,308	41.7%	2,616,827	34.2%
Service	7,146	11.5%	272,860	17.3%	1,500,551	19.6%
Sales and office	15,294	24.6%	373,300	23.7%	1,743,617	22.8%
Construction, extraction, and maintenance	2,560	4.1%	101,631	6.4%	675,894	8.8%
Production, transportation, and material moving	4,623	7.5%	171,980	10.9%	1,118,977	14.6%
Total Employment	62,126	100%	1,578,079	100%	7,655,866	100%

Source: American Community Survey, 5-Year Estimate, 2018

Table 2-8
Average Annual Salary by Sector
Unincorporated Areas and Orange County – 2009 and 2017

Occupation	2009		2017	
	Unincorporated Areas In $ (Thousands)	Orange County In $ (Thousands)	Unincorporated Areas In $ (Thousands)	Orange County In $ (Thousands)
Agriculture	$32	$32	$45	$48
Construction	$58	$58	$59	$73
Manufacturing	$39	$37	$73	$77
Wholesale	$74	$71	$93	$86
Retail	$36	$35	$34	$37
Information	$78	$75	$95	$107
Finance-Insurance-Real Estate	$77	$74	$81	$105
Profession-Management	$78	$76	$81	$73
Education-Health	$47	$47	$58	$54
Leisure-Hospitality	$21	$21	$24	$26
Public Administration	$52	$54	$40	$88
Other Services	$32	$32	$31	$38
Non-Classified	$48	$48	N/A	N/A
Average	$52	$51	$57	$63

Source: California Employment Development Department, 2009, 2017

Table 2-8 demonstrates that the average annual salary by sector has increased since 2009 in most sectors in both Unincorporated County areas and Orange County as a whole. Between 2009 and 2017, many sectors experienced increases in annual salary of greater than 25% and some up to 43%.

Future housing needs are affected by the number and type of new jobs created during this planning period. **Table 2-9** shows projected job growth by industry for the Santa Ana-Anaheim-Irvine Metropolitan Statistical Area (MSA) (Orange County) for the period 2018-2028. Labor market information used to identify total employment and employment growth trends within the County is generated for geographic units called metropolitan statistical areas, the MSA covers the same geographic areas as the County. Using the data provided by the State Employment Development Department, total employment in Orange County is expected to grow by 7.2% between 2018 and 2028. The overall growth is expected to add 126,300 new jobs and bring the employment of Orange County to over 1,890,000 by 2028.

Generally, residents who are employed in well-paying occupations have less difficulty obtaining adequate housing than residents in low paying occupations. **Table 2-9** illustrates the growth

trend in low-wage service industries such as health care and social assistance, and accommodation and food services.

Table 2-9
Projected Job Growth by Industry – 2018-2028
Santa Ana-Anaheim-Irvine Metropolitan Statistical Area

Industry Title	Annual Average Employment		Employment Change	
	2018	2028	Jobs	%
Total Employment	1,764,000	1,890,300	126,300	7.2
Self-Employment (A)	109,100	117,300	8,200	7.5
Unpaid Family Workers (B)	--	--	--	--
Private Household Workers (C)	1,700	1,600	(100)	-5.9
Total Farm	2000	1900	(100)	-5.0
Total Nonfarm	1,651,200	1,769,500	118,300	7.2
Mining and Logging	500	400	(100)	-20.0
Construction	106,300	113,000	6,700	6.3
Manufacturing	160,700	156,900	(3,800)	-2.4
Trade, Transportation, and Utilities	261,600	270,800	9,200	3.5
Wholesale Trade	79,800	81,400	1,600	2.0
Retail Trade	152,600	156,000	3,400	2.2
Transportation, Warehousing, and Utilities	29,200	33,400	4,200	14.4
Transportation and Warehousing	26,200	30,200	4,000	15.3
Information	26,700	29,700	3,000	11.2
Financial Activities	118,700	126,100	7,400	6.2
Finance and Insurance	79,300	84,300	5,000	6.3
Real Estate and Rental and Leasing	39,400	41,800	2,400	6.1
Professional and Business Services	317,000	346,500	29,500	9.3
Management of Companies and Enterprises	36,700	38,700	2,000	5.4
Admin/Support and Waste Mgmt & Remediation	151,300	163,600	12,300	8.1
Education Svcs, Health Care, and Social Assistance	224,700	263,600	38,900	17.3
Educational Services (Private)	29,300	33,900	4,600	15.7
Health Care and Social Assistance	195,400	229,700	34,300	17.6
Leisure and Hospitality	222,600	242,200	19,600	8.8
Arts, Entertainment, and Recreation	51,000	56,500	5,500	10.8
Accommodation and Food Services	171,700	185,700	14,000	8.2
Other Svcs (excludes Private Household Workers)	51,400	53,700	2,300	4.5
Government	161,200	166,600	5,400	3.3
Federal Government	11,100	11,200	100	0.9

Table 2-9
Projected Job Growth by Industry – 2018-2028
Santa Ana-Anaheim-Irvine Metropolitan Statistical Area

Industry Title	Annual Average Employment		Employment Change	
	2018	2028	Jobs	%
State and Local Government	150,200	155,400	5,200	3.5
State Government	32,000	33,900	1,900	5.9
Local Government	118,200	121,500	3,300	2.8

Source: California Employment Development Department, April 2021
Industry detail may not add up to totals due to independent rounding
(A) Self-Employed persons work for profit or fees in their own business, profession, trade, or farm. Only the Unincorporated self-employed are included in this category. The estimated and projected employment numbers include all workers who are primarily self-employed and wage and salary workers who hold a secondary job as a self-employed worker.
(B) Unpaid family workers are those persons who work without pay for 15 or more hours per week on a farm or in a business operated by a member of the household to whom they are related by birth or marriage.
(C) Private Household Workers are employed as domestic workers whose primary activities are to maintain the household.
Industry employment is based on the Quarterly Census of Employment and Wages (QCEW) program.

The employment trends indicate that there continues to be a need for moderate- and lower-income housing to support the housing needs of persons in the service and sales industries, including the educational sector, health care sector, entertainment sector, and transportation sector. The demand for affordable homes and apartments is likely to remain very high, while the supply is likely to remain tight. Many of the jobs projected to be generated in the MSA through the year 2028 are expected to be in the educational, health care, entertainment, and transportation sectors.

Table 2-10
Average Travel Time to Work (Minutes)

	Unincorporated Areas	Orange County
2019	29	28
2010	31	25.9
2000	29.8	27.2

Source: SCAG Local Profiles Dataset, 2021

As shown in **Table 2-10,** above, the average travel time to work in the Unincorporated County areas remained relatively consistent from 2000 to 2019 – decreasing by only an eighth of a minute overall. This is consistent with the average travel time to work throughout Orange County, which increased by an eighth of a minute between 2000 and 2019. While travel time to work remains slightly higher on average in the Unincorporated County areas than in Orange County as a whole, the difference is negligible (one minute) and demonstrates that there is a relatively good match between housing and employment opportunities.

Household Characteristics and Trends

To understand current housing concerns and anticipated future needs, housing occupancy characteristics need to be identified. The following is an analysis of household size and income characteristics. As defined within the County's Zoning Code, "a household includes all people occupying a single dwelling unit. A household shall also mean all people occupying two (2) dwelling units on the same site if both units are used as group homes owned or operated by the same operator" (section 7-9-95.1).

Household Composition and Size

As shown by **Table 2-11,** in Unincorporated Orange County, the average annual change in total households between 2010 and 2019, increased by 0.98%, while in Orange County as a whole, the percent change was lower. Most households within Orange County and in Unincorporated CDPs are comprised of family households, with non-family households and householders living alone representing a growing number of the total households between 2010 and 2019. In 2019, 83.4% of households in Unincorporated CDPs and 70% of households in Orange County consisted of families, and about 35.6% in Unincorporated CDPs and 31% in Orange County had school-age children. In comparison, in 2010, family households with school-age children were about 12% and 3% higher, respectively. All other household types remained about the same between these 9 years. About 21% of Orange County households were a single person living alone, compared to 13.2% in Unincorporated CDPs (**Table 2-12**).

Table 2-11
Unincorporated CDPs Household Composition 2010-2019

Household Type	2010		2019		Average Annual % Change
	Households	% of Total Households	Households	% of Total Households	
Total households	27,376	100%	29,938	100%	0.98%
Family households	22,525	82.3%	24,969	83.4%	1.21%
-with own children under 18	10,733	47.6%	10,644	35.6%	-0.092%
Non-family households	4,851	17.7%	4,969	16.6%	0.27%
-Householder living alone	3,645	13.3%	3,975	13.2%	3.02%
Average household size	3.42	--	3.45	--	-

Source: American Community Survey, 5-Year Estimates, 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 2-12
Orange County Household Composition 2010-2019

Household Type	2010		2019		Average Annual % Change
	Households	% of Total Households	Households	% of Total Households	
Total households	992,781	100%	1,037,492	100%	0.5%
Family households	708,491	71.4%	744,011	71.7%	0.55%
-with own children under 18	335,587	33.8%	320,601	30.9%	-0.49%
Non-family households	284,290	28.6%	293,481	28.3%	0.36%
-Householder living alone	207,849	20.9%	218,835	21.1%	0.59%
Average household size	2.99	–	3.01	–	–

Source: Census 2010, Summary File 1- General Population and Housing Characteristics- Demographic Profile 1, American Community Survey, 5-Year Estimates, 2019

In many respects there are notable differences between renter and owner households. According to the 2019 American Community Survey data, over 18% of Unincorporated renter households consisted of one person living alone, a significantly higher proportion than for owners (12%). Large households of 5 or more were more prevalent among renters (15.86%) than owners (14.5%). **Table 2-13** describes household size distribution by tenure.

Table 2-13
Household Size by Tenure (Owner vs. Renter)
Unincorporated Orange County

Household Size	Owners		Renters	
	Households	%	Households	%
1 person households	3,878	12.0%	1708	18.3%
2 person households	11,293	35.0%	2457	26.3%
3 person households	5,734	17.8%	2,055	22.0%
4 person households	6,716	20.8%	1656	17.7%
5 person households	2,985	9.3%	918	9.8%
6 person households	1018	3.2%	355	3.8%
7+ person households	639	2.0%	205	2.2%
Total households	32,263	100%	9,354	100%

Source: American Community Survey, 2014-2018, 5-Year Estimates

Tenure

Table 2-14 shows tenure (owner vs. renter) for the Unincorporated County areas compared to Orange County as a whole. According to the 2018 American Community Survey, 78.4% of housing units in the Unincorporated County areas were owner-occupied, compared to 57.4% countywide. Renters in the Unincorporated County account for 48.3% of households with 2 to 3 persons according to **Table 2-13**. Thus, it appears that there may be fewer rental units (non-

owner occupied) in the Unincorporated County areas, which could result in less availability of rentals, and thus, fewer more affordable options in the Unincorporated County areas.

Table 2-14
Household Tenure (Owner vs. Renter)

Tenure	Unincorporated Areas		Orange County	
	Units	%	Units	%
Owner occupied	33,267	78.4%	592,269	57.4%
Renter occupied	9,166	21.6%	440,104	42.6%
Total occupied units	42,433	100%	1,032,373	100%

Source: American Community Survey 2014-2018, 5-Year Estimates

Households with children may require different or additional design standards and are often larger to accommodate additional persons to avoid overcrowding and displacement. **Table 2-15** displays household types for Unincorporated County areas, Orange County, and the State. Amongst the three jurisdictions, households categorized as "family" made up the largest percent of households overall. Unincorporated County areas and Orange County have a higher percentage of family households than the state. Family households with children represent the same percentage for Orange County as the State and represent larger percentages than non-family households.

Table 2-15
Population by Familial Status

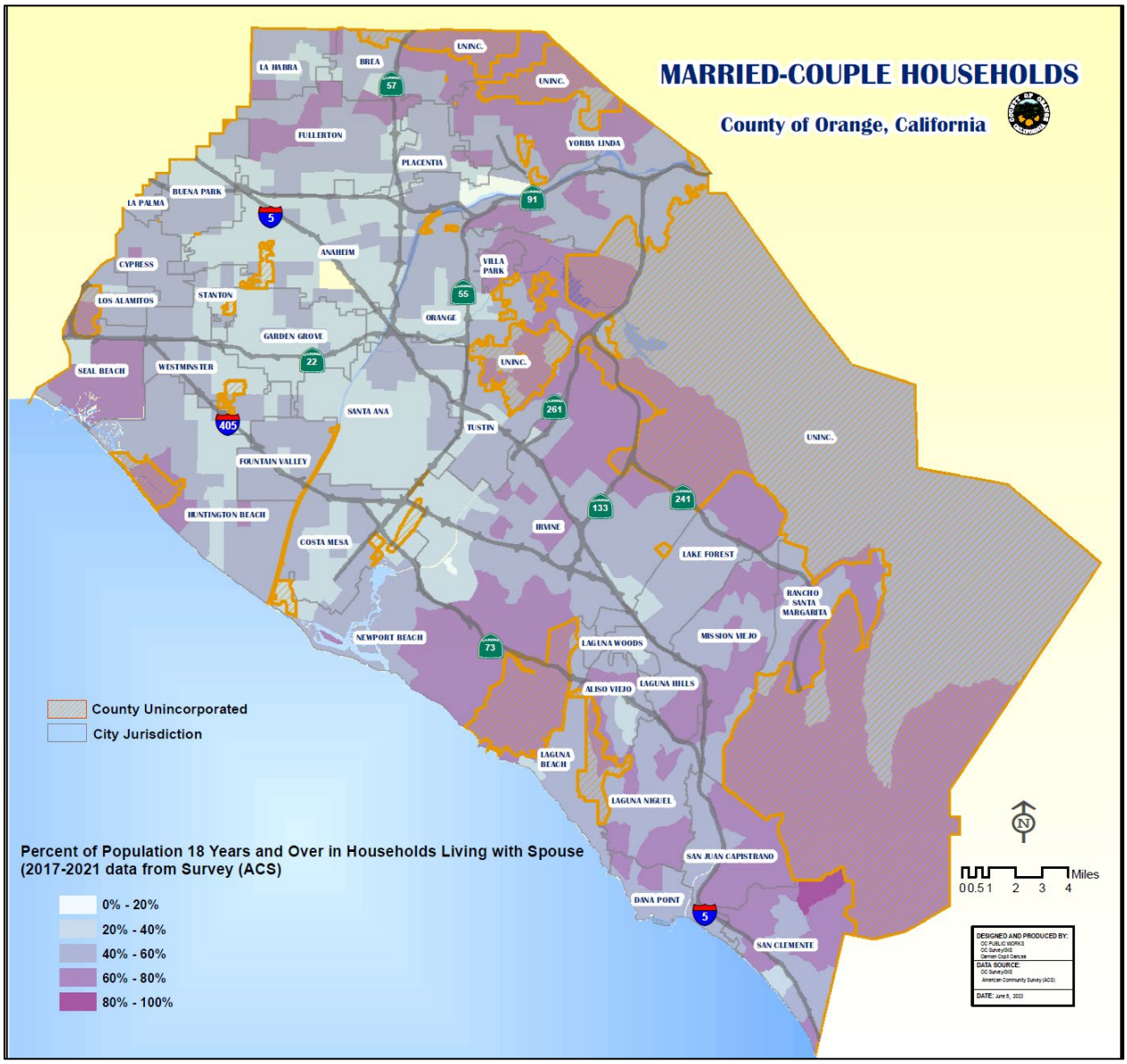
Familial Status	Unincorporated CDPs	Orange County	California
Family Households	83.4%	71.7%	68.7%
Married-Couple Family Households	70.7%	54.9%	49.8%
With Related Children Under 18	35.6%	34.1%	34%
Female Households, No Spouse	9.4%	11.5%	13%
Non-Family Households	16.6%	28.3%	31.3%
Households with One or More People 60 Years+	39.8%	39.9%	39.1%
Total Households	**29,938**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Additionally, **Figures 2-1** through **2-4** below show household type and familial status geographically across Orange County. As the maps demonstrate, the coastal, south Orange County and inland/foothills areas have the highest concentrations of married households and married households with children. The central areas of the County have greater percentages of unmarried and/or female only headed households. As **Table 2-15** demonstrates, the percentage

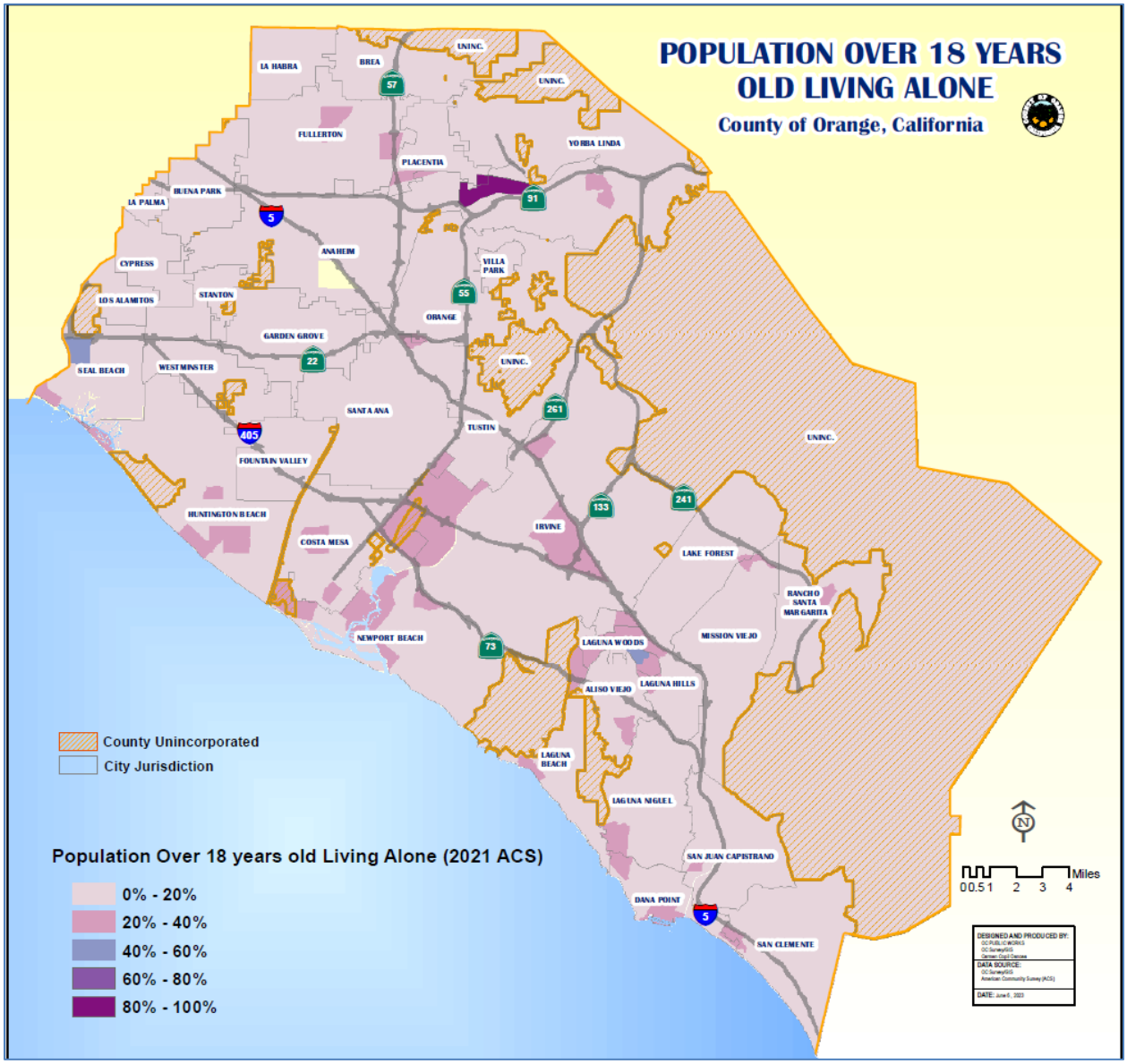
of family households in Orange County exceeds the State percentage. Consistent with these trends, as shown in **Figures 2-1** through **2-4,** the Unincorporated "islands" in the more central parts of Orange County have a higher concentration of unmarried and/or female only headed households, while the Unincorporated County areas in more coastal areas and in inland/foothill areas have high concentrations of married households and married households with children. The Unincorporated "islands" in central areas of Orange County also generally correspond with areas that have higher rates of renters versus homeowners.

Figure 2-1
Married-Couple Households



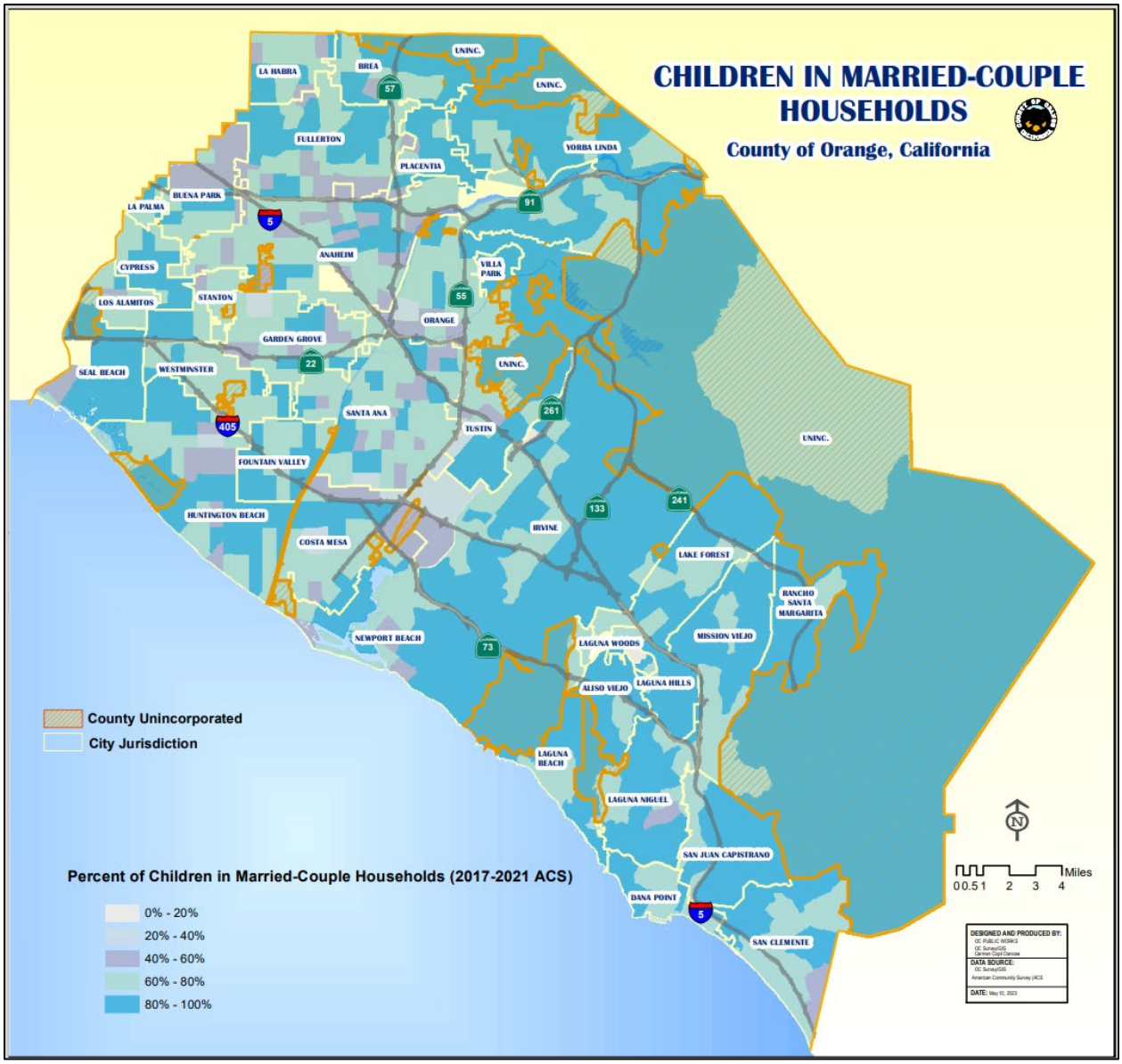
Source: HCD AFFH Data Viewer, 2022

Figure 2-2
Population Over 18 Years Living Alone



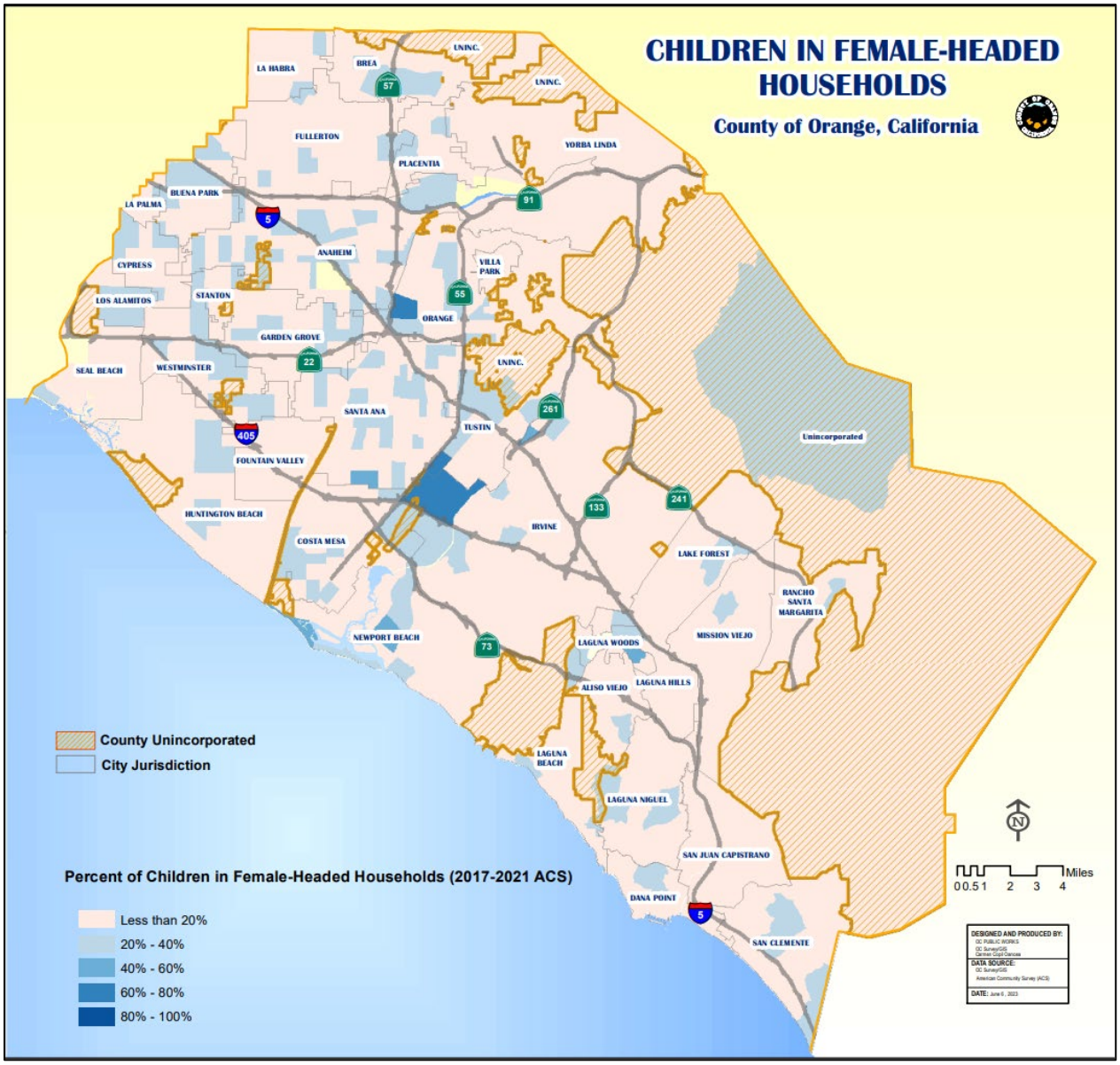
Source: HCD AFFH Data Viewer, 2022

Figure 2-3
Children in Married-Couple Households



Source: HCD AFFH Data Viewer, 2022.

Figure 2-4
Children in Female-Headed Households



Source: HCD AFFH Data Viewer, 2022

Household Income

Household income is a primary factor affecting housing needs in a community. According to the 2021 Census estimates, the median household income in Orange County was $100,485, approximately 16.3% higher than the statewide median income of $84,097 (**Table 2-16**). The table also shows the income differences between different areas of the county. The Coto de Caza and Ladera Ranch Census Designated Places (CDPs), both of which are part of Unincorporated Orange County, had the highest incomes while the Midway City CDP, also a part of Unincorporated Orange County, area was lowest.

Table 2-16
Median Household Income

Jurisdiction	Median Household Income	% of County Median Income
California	$84,097	84%
Orange County	**$100,485**	**100%**
Coto de Caza CDP	$210,990	210%
Ladera Ranch CDP	$169,706	169%
Las Flores CDP	$147,404	147%
Midway City CDP	$48,323	48%
Modjeska CDP	$103,967	103%
North Tustin CDP	$157,487	157%
Rancho Mission Viejo CDP	$152,989	152%
Rossmoor CDP	$153,750	153%
Silverado CDP	$90,938	90%
Trabuco Canyon CDP	$164,417	164%
Williams Canyon CDP	N/A	N/A
El Modena Area (Approx. Avg. Median)	$110,667	110%
Orange-Olive Area (Approx. Avg. Median)	$129,636	129%
Stanton Area (Approx. Avg. Median)	$70,360	70%
West Anaheim Area (Approx. Avg. Median)	$71,866	72%

Source: American Community Survey, 5-Year Estimates, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

As shown in **Table 2-16**, there are no areas of extremely low-income households in Unincorporated Orange County. The Midway City CDP is an area of Unincorporated Orange County with a median income in the very low-income range. In addition, the El Modena and West Anaheim and Stanton census tracts have an average median income in the low-income range. The remainder of Unincorporated County areas are either moderate- or above-moderate-income.

While there are pockets of high AMI households (above-moderate-income households) throughout Orange County, including Unincorporated County areas, there are also pockets of very low- and low-income households. This indicates that the demand for affordable homes and apartments is likely to remain high, while supply is likely to remain tight. As shown in **Table 2-22**, in the Unincorporated County areas, there are 9 ongoing housing projects in various stages of development which are anticipated to provide more than 705 total housing units. However, the demand for rental units – apartments, condominiums, and single-family homes – is likely to remain strong in the future, particularly in the more central areas of Orange County and in the Unincorporated "islands" in those areas, where the percentage of renters is higher than the percentage of owners.

Housing Inventory and Market Conditions

This section summarizes the housing inventory in the Unincorporated County and prevailing market conditions.

Age and Condition of Housing Stock

Age is one measure of housing stock conditions and a factor for determining the need for rehabilitation. Without proper maintenance, housing units deteriorate over time. Thus, units that are older are more likely to need major repairs (e.g., a new roof or plumbing). As a general principle, houses 30 years or older are considered aged and are more likely to require moderate to major repairs. In addition, older houses may not be built to current standards for fire and earthquake safety. According to 2019 American Community Survey data, about 72.9% of owner-occupied units and 53% of rental units in the Unincorporated County areas were built before 1990 and are approximately 30 years old or greater (**Table 2-17**); 41.5% are 60 years or older. This compares to 87% of units in Orange County as a whole, which were built before 1990 and 37.1% which were built before 1960.

Table 2-17
Age of Housing Stock

Year Built	Unincorporated Areas		Orange County	
	Units	%	Units	%
2014 to present	1,612	3.8%	29,369	2.7%
2010-2013	806	1.9%	22,261	2.0%
2000-2009	9,081	21.4%	91,455	8.3%
1990-1999	6,323	14.9%	128,774	11.7%
1980-1989	2,928	6.9%	163,803	14.9%
1970-1979	4,074	9.6%	256,739	23.3%
1960-1969	6,959	16.4%	214,045	19.5%
1950-1959	8,784	20.7%	143,431	13.0%
1940-1949	721	1.7%	23,121	2.1%
1939 and earlier	1,146	2.7%	27,451	2.5%
Total Units	**42,433**	**100%**	**1,100,449**	**100%**
Source: American Community Survey, 5-Year Estimates, 2019				

As reported in recent Census estimates, only 0.1% of owner-occupied units and 1.1% of rental units in the Unincorporated County areas lacked complete kitchen facilities while 0.2% of owner-occupied units and 1.3% of rental units lacked complete plumbing facilities countywide (**Table 2-18**). There may also be units that require rehabilitation or replacement despite possessing complete kitchen and plumbing facilities.

Table 2-18
Kitchen and Plumbing Facilities

	Unincorporated Areas		Orange County	
	Units	%	Units	%
No Telephone Service Available	424	1.00%	21,459	1.95%
Lacking Plumbing Facilities	144	0.34%	4,292	0.39%
Lacking Complete Kitchen Facilities	424	1.00%	14,196	1.29%
Source: American Community Survey 2005-2019, SCAG Local Housing Data Pre-Certified Local Housing Data 2020				

To determine the condition of the housing stock, the County conducted a recent assessment of code enforcement complaints within Unincorporated Orange County. **Table 2-19** summarizes the results of the assessment.

Table 2-19
Housing Rehabilitation Need –
Unincorporated Orange County – 2019-2020

Unincorporated Areas	Number of Property Maintenance Complaints in 2020	Number of Property Maintenance Complaints in 2019
Anaheim Island	72	54
Costa Mesa Islands	2	5
Coto De Caza	1	6
Foothill/Trabuco	1	5
Ladera Ranch	8	2
Las Flores	N/A	1
Midway City	76	30
North Tustin	69	146
Orange Park Acres	23	42
Placentia Islands	3	4
Rancho Mission Viejo	4	2
Rossmoor	18	34
Silverado-Modjeska	16	17
Yorba Linda Islands	1	10
Source: OC Public Works 2020		

Based on the assessment of recent property maintenance complaints in 2019 and 2020, most of the concerns are located in the Anaheim Islands, Midway City, North Tustin, and Orange Park Acres. The complaints vary from the collection of junk and debris, lack of yard maintenance, storage of inoperable vehicles, unpermitted buildings, and animals/insects. Approximately 29 of the 300 total Unincorporated properties with maintenance complaints in 2020 are noted as having unpermitted or substandard units; therefore approximately 1% of the total units with identified property maintenance complaints may need to be replaced or rehabilitated.

Overall, the housing stock in the Unincorporated County areas is in good condition, despite the fact that the vast majority of homes are 20 or more years old. Only a small minority of the housing stock requires replacement or serious rehabilitation, indicating that housing maintenance or repair is not a major concern or contributing factor for housing needs within the Unincorporated County.

Housing Stock Profile

Table 2-20 summarizes the distribution of housing by type in the Unincorporated portions of Orange County as of 2020. Throughout the Unincorporated County, single-family detached (SFD) units characterize the most abundant housing type (75.2%); larger multifamily projects of

five or more units represent 10.3% of the stock; and single-family attached units, such as condominiums, represent 11% of the total housing.

Looking at the change from 2000 to 2020, **Table 2-20** shows the housing stock of the Unincorporated County areas has decreased by about 30.62% due to annexations and incorporations. The County of Orange lost 168 Unincorporated acres due to annexations since 2014. The Unincorporated County areas have shrunk significantly since 2014, with a 9.5% decrease in acreage from 176,553 acres to 176,385 acres.

Table 2-20
Housing by Type

Structure Type	2000		2020		Growth	
	Units	%	Units	%	Units	%
Unincorporated Areas						
Single-family detached	38,725	63%	31,909	75.2%	-6,816	-17.6%
Single-family attached	9,438	15%	4,674	11%	-4,764	-50.48%
Multifamily 2-4 units	2,530	4%	862	2%	-1,668	-65.9%
Multifamily 5+ units	9,925	16%	4,356	10.3%	-5,569	-56.1%
Mobile homes	543	1%	632	1.5%	89	16.4%
Total Units	61,161	100%	42,433	100%	-18,728	-30.62%
Orange County						
Single-family detached	489,657	51%	556,760	50.1%	-67,103	-13.7%
Single-family attached	124,702	13%	132,709	12%	8,007	6.4%
Multifamily 2-4 units	88,804	9%	94,718	8.5%	5,914	6.6%
Multifamily 5+ units	233,871	24%	293,712	26.4%	59,841	25.6%
Mobile homes	32,450	3%	33,522	3%	1,072	3.3%
Total Units	969,484	100%	1,111,421	100%	141,937	14.6%
Source: California Department of Finance, Table E-5, 2020						

Single-family detached houses continue to represent the largest proportion of the existing housing stock within the Unincorporated County areas, which is consistent with the housing stock trends in Orange County as a whole. This trend also reflects the fact that the majority of Unincorporated County areas are concentrated in the coastal and foothill areas of the County, which generally reflect a higher percentage of people who own their homes as opposed to rent, while the more central areas of Orange County have both a higher concentration of multifamily units and a higher percentage of people who rent.

Despite the loss of acreage and associated housing units to incorporations and annexations, single-family attached homes, and multifamily developments of five or more units represent the second and third largest proportions of the existing housing stock, respectively, within the Unincorporated County areas. These trends are on par with the trends within Orange County as a

whole; however, the Unincorporated County areas have a smaller overall number and percentage of multifamily developments than the larger County. Where Orange County's overall housing stock in 2020 was comprised of approximately 26.4% multifamily developments with five or more units, the Unincorporated County areas' total housing stock was comprised of 10.3% multifamily developments with five or more units. This indicates that there is a demand for multifamily developments that is likely to remain and to potentially grow, in addition to the continued demand for single-family housing. While the demand is high, the existing stock of both single-family housing and multifamily housing remains tight.

Residential Construction Trends

The majority of residential construction within the Unincorporated areas is occurring within the Ranch Plan Planned Community, which includes a mix of residential housing types. At full build out, the Ranch Plan Planned Community is approved to have 14,000 dwelling units, including both single-family attached and detached residences, as well as multifamily developments of various sizes. Since 2019, Planning Area 3.1 of the Ranch Plan Planned Community has been fully permitted and will ultimately accommodate 775 residential dwelling uses as well as 120,000 square feet of Senior Living Facility uses. Planning Areas 3 and 4 are still being permitted, but at ultimate build out will include an additional 7,500 dwelling uses. This planned development represents the largest residential construction that is planned within the Unincorporated areas, concentrated towards the southern end of the Unincorporated areas. Planning Area 3.2a was issued certificates of occupancy in January 2023 and includes 145 deed-restricted senior housing (Age Qualified) and 134 market-rate, for sale units. Planning Area 3.2b has been approved with six neighborhood builders for a total of 514 units.

Beyond the Ranch Plan Planned Community, there are smaller residential developments planned in other portions of the Unincorporated areas. Together, these smaller planned developments total approximately 145 dwelling units, with 95 of those units being part of a planned, dedicated senior-living facility. **Tables B-14** in Appendix B show the affordable housing developments that have occurred within the Housing Opportunities Overlay Zone. Below, **Table 2-21** shows the residential developments in the Unincorporated areas that have been completed since 2015. In addition, **Table 2-22** shows the pending housing developments for the Unincorporated areas, including a breakdown by the types of units permitted.

Table 2-21
Completed Housing Units
Unincorporated Orange County (2015 – Current)

	Single-Family	2-4 units	5+ Units	ADUs	Total
2015	164	0	270	2	436
2016	494	0	37	7	538
2017	710	0	56	14	780
2018	470	6	339	5	820
2019	347	2	0	8	357
2020	105	108	0	11	224
2021	100	3	0	34	137
2022	232	15	83	38	368
2023	109	0	0	10	119

Source: OC Development Services, May 2023

Table 2-22
Pending Housing Developments - Unincorporated Orange County

Development Name	Number Units	Type of Units	Price Range	Status
Saddlecrest	65	Single-Family Development	Above Moderate	Under construction (2024); Expected completion: 2026
Cielo Vista	80	Single-Family Development	Above Moderate	Under construction (2024); Expected completion: 2026
Esperanza Hills Specific Plan	340	Single-Family Development	Above Moderate	Approved, processing permits; Expected completion: 2028
Wass Condo	10	Condo	Above Moderate	Approved; Expected completion: 2026
Cowan Heights Estates	16	Single-Family Development	Above Moderate	Under construction (2024); Expected completion: 2026
American Family Housing	65	Affordable Multifamily Development	Lower Income	Approved; Expected completion: 2026

Source: OC Development Services, November 2024

As a whole, the pending housing developments within the Unincorporated areas, along with the affordable housing developments within the Housing Opportunities Overlay Zone show a trend towards the development of additional housing within the limited area available for such development in the Unincorporated area. However, as the pending housing developments included in **Table 2-22** demonstrate, the majority of pending housing developments are generally

geared towards above-moderate-income households. On average, since 2015, 420 units per year were constructed within the Unincorporated areas, with a total of 3,779 units constructed since 2015. 785 of the units constructed since 2015 (approximately 21% of the total units) are housing units within large multifamily complexes containing structures with five or more units, while 134 of the units constructed since 2015 (approximately 4% of the total units) are 2-to-4-unit developments, and 2,731 units are single-family units (approximately 72% of the total units). The remaining 3 % of the units developed since 2015 (129 units) consist of accessory dwelling units or junior accessory dwelling units located on existing residential properties.

Of the currently pending residential developments, totaling 705 units, 27 % (or 191 units) are in condominium or multifamily unit developments with ten or more total units each. The remaining 73 % of the currently pending housing developments are single-family units. This trend in pending developments is consistent with the residential development that has occurred over the past decade within the Unincorporated areas. As indicated by **Table 2-16,** the Midway City and Las Flores CDPs that are within the Unincorporated County, likely need additional low and/or very low-income housing. Additionally, as indicated by **Tables 2-21 and 2-22,** there is likely to remain a need for additional multifamily developments and for additional low- and very low-income housing within the Unincorporated areas, while supply is likely to remain tight if existing trends continue. SCAG's local profile for the Unincorporated areas reveals that only 3.9% of the total households in Orange County reside in the Unincorporated areas (as of 2018), but retained a higher number of total residential units permitted per 1,000 residents than in Orange County as a whole (4.7 permits per 1,000 residents in the Unincorporated areas versus 2.5 permits per 1,000 residents in Orange County as a whole) as of 2018. *(Source: SCAG Profile of Unincorporated Orange County, Local Profiles Report, 2019.)*

Vacancy Rates and Trends

Vacancy trends in housing are analyzed using a "vacancy rate" which establishes the relationship between housing supply and demand. The vacancy rate is an indicator of the general availability of housing. It also reflects how well available units meet the current housing market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high vacancy rate may indicate either an imbalance between household characteristics and the type of available units, an oversupply of housing, or special situations such as in areas where there are vacation homes.

The availability of vacant housing units provides households with choices on different unit types to accommodate changing needs (e.g., single persons, newly married couples, and elderly households typically need smaller units than households with school age children). A low vacancy rate may contribute to higher market rents and prices and may limit the choices of households in finding adequate housing. It may also be related to overcrowding, as discussed later.

Table 2-23 provides 2019 American Community Survey occupancy and tenure characteristics for the Unincorporated areas compared to Orange County as a whole. Owner occupied housing units in Unincorporated areas represented 77.5% of all occupied housing units, whereas those in Orange County as a whole represented a lower 57.4% indicating a higher rate of rental units outside of the Unincorporated areas. The data indicated a 11.8% rental vacancy rate in the Unincorporated areas and a 26.3% rental vacancy rate in Orange County as a whole. These figures indicate a strong real estate market with a relatively low vacancy rate– at the lowest in Unincorporated areas (3.8%) as compared to Orange County as a whole (5.7%).

Table 2-23
Housing Vacancy

	Unincorporated Areas		Orange County	
	Units	**%**	**Units**	**%**
Total housing units	42,433	100%	1,100,449	100%
Occupied units	40,804	96.2%	1,037,492	94.3%
-Owner occupied	31,623	77.5%	595,272	57.4%
-Renter occupied	9,181	22.5%	442,220	42.6%
Vacant units	1,629	3.8%	62,957	5.7%
-For rent	192	11.8%	16,547	26.3%
-For sale	456	28.0%	6,124	9.7%
-Rented or sold, not occupied	401	24.6%	9,492	15.1%
-For seasonal or occasional use	363	22.3%	18,865	30%
-All other vacancies	218	13.4%	11,929	19%

Source: American Community Survey, 5-Year Estimates, 2019; SCAG Pre-Certified Local Housing Data 2020

According to the American Community Survey's 2019 data and SCAG Local Housing Data for 2020, there were approximately 1,629 total units considered vacant in the 2019-2020 timeframe, with approximately 22.3% of those units reserved for seasonal or occasional use, and an additional 24.6% of the total vacant units being rented or sold but unoccupied. The information in **Table 2-23** indicates that there is a high demand for rental units, but low vacancy. Similarly, there is a high demand for sale units, but low vacancy, though the vacancy rate applicable to for sale units is higher than rental units (28% as compared to 11.8%). The combined effect of these vacancy rates indicates that there is a demand for rental units and a slightly lower demand for units available for purchase, but insufficient supply to meet either of those demands, potentially contributing to issues with affordability for available housing.

Housing Units At-Risk of Conversion

Housing units that are at-risk of conversion are those multifamily, rental housing complexes that receive government assistance under any of the federal, state, and/or local housing assistance,

including any combination of rental assistance, mortgage insurance, interest reductions and/or direct loan programs, and which are eligible to convert to market rate units within 10 years of the beginning of the housing element planning period. In other words, at-risk units are only those that receive some kind of governmental assistance and do not include those which are considered affordable, but which receive no governmental assistance. There is a risk that such units will be converted to market-rate (less or not affordable) units when a rent subsidy contract expires or is terminated, or when restrictions on the units associated with governmental assistance programs expire. Within Unincorporated Orange County, there are no units anticipated to be at-risk during the planning period. Whenever units receiving governmental assistance near the end of their contracts to receive governmental assistance, OC Community Resources attempts to negotiate either a new contract or an extension of the existing contract to ensure that the units remain available and are not converted to market rate housing. OC Community Resources will continue to do so throughout the planning period as part of the County's efforts to address regional housing need.

Housing Units Demolished or Converted in the Coastal Zone

State law requires that coastal jurisdictions monitor and report the number of low-and moderate-income ("L/M") housing units within the Coastal Zone that are constructed or lost due to demolition or conversion to non-residential uses since 1982.

The amount of Unincorporated territory within the Coastal Zone has decreased considerably since 1982 due to the incorporation of Dana Point and Laguna Niguel as well as annexations to the Cities of Laguna Beach, Newport Beach, and Huntington Beach. The only major Unincorporated County area with residential development in the Coastal Zone is Emerald Bay. Bolsa Chica, Laguna Coast Wilderness Park, Aliso-Wood Canyon Regional Park, and Banning Ranch are the other major Unincorporated County coastal areas. **Table 2-24** shows the number of Low/Moderate income housing units constructed, demolished, converted, and replaced within the Coastal Zone since 1982.

- A total of 33 units were demolished or converted between 1982 and 1988, but the income category of these units was not recorded.
- Between 1989 and 2000, 15 units were demolished and replaced, including several in Emerald Bay which were demolished as a result of fire damage during the devastating fires that occurred in October 1993. The income category for these 15 units was not recorded. No units were converted from residential to non-residential use during this time.
- From 2001 through 2012, 262 units were demolished, including 221 units in a mobile home park.

- From 2012 to 2020, 23 units were demolished. The income category of these units is unknown.

Table 2-24
Low- and Moderate- Income Units Constructed, Converted, Demolished, and Replaced in the Coastal Zone – 1982-2020

Time Period	Units Constructed	Units Demolished	Units Converted	Units Replaced
1982-1988	1278[b]	29[a]	4[a]	N/A
1989-2000	0	15[a]	0	15 [a]
2001-2012	77[a]	262[a]	0	N/A
2012-2020	27	23	0	N/A
Total	1382[a]	329[a]	4[a]	15[a]

Notes:
a. Numbers reflect total units, not just Low/Moderate units. Specific income category not available
b. Numbers reflect only Low/Moderate units.
Source: Orange County, OC Public Works, OC Development Services, 2020

Housing stock within the Coastal Zone has remained limited since 1982 and has become more so as coastal areas have been incorporated or annexed to cities. However, the construction of 1,382 housing units, 1,278 of which fall within the Low/Moderate category, has increased the total housing stock within the Coastal Zone since 1982 notwithstanding the approximately 329 demolished units and 4 converted units. In total, since 1982, 1,068 units have been constructed in the Coastal Zone – less the units that have been demolished and converted since 1982.

Housing Cost

Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the AMI: extremely low (30% or less of AMI), very low (31-50% of AMI), low (51-80% of AMI), moderate (81-120% of AMI) and above-moderate (over 120% of AMI). Housing affordability is based on the relationship between household income and housing expenses. According to the U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development[1] (HCD), housing is considered "affordable" if the monthly payment is no more than 30% of a household's gross income. In some areas (such as Orange County), these income limits may be increased to adjust for high housing costs.

[1] HCD memo of 2/25/2013 (http://www.hcd.ca.gov/hpd/hrc/rep/state/inc2k13.pdf)

Table 2-25 shows 2023 affordable rent levels and estimated affordable purchase prices for housing in Orange County[2] by income category. Based on state-adopted standards, the maximum affordable monthly rental housing costs for a four-person acutely low-income household is $478, for a four-person extremely low-income household it is $1,076, while the maximum affordable housing costs for four-person very low-income households is $1,793. The maximum affordable housing cost for four-person low-income households is $2,870, and the maximum for four-person moderate-income households is $3,195.

Table 2-25
Income Categories and Affordable Housing Costs
Orange County

2023 County Median Income = $127,800*	Income Limits	Affordable Rent	Maximum Affordable Price (est.)
Acutely Low (<15%)	$19,150	$478	$58,030
Extremely Low (<30%)	$43,050	$1,076	$141,147
Very Low (31-50%)	$71,750	$1,793	$275,961
Low (51-80%)	$114,800	$2,870	$478,333
Moderate (81-120%)	$127,800	$3,195	$541,525

*Note: * As determined by California Department of Housing and Community Development*
Assumptions:
- Based on a family of 4
- 30% of gross income for rent or Principal/Interest/Taxes/Insurance
- 2023 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.
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

Maximum purchase prices are more difficult to determine due to variations in mortgage interest rates and qualifying procedures, down payments, special tax assessments, homeowner association fees, property insurance rates, etc. With this caveat, the maximum home purchase prices by income category shown in **Table 2-25** above have been estimated. For-Sale Housing Existing housing resale price statistics for calendar years 2000 to 2023, are shown in **Table 2-26**.

Table 2-26
Median Home Sales Price – Unincorporated Areas and Orange County

Year	Unincorporated Areas		Orange County	
	Price ($)	% Change	Price ($)	% Change
2000	519,500	--	289,193	--
2001	582,100	12.1%	322,386	11.5%

[2] Affordable rent and purchase prices are based on county median income.

Table 2-26
Median Home Sales Price – Unincorporated Areas and Orange County

Year	Unincorporated Areas		Orange County	
	Price ($)	% Change	Price ($)	% Change
2002	594,100	2.1%	375,777	16.6%
2003	659,100	10.9%	441,861	17.6%
2004	881,600	33.8%	563,303	27.5%
2005	946,000	7.3%	645,292	14.6%
2006	1,085,500	14.7%	689,422	6.8%
2007	1,012,800	-6.7%	681,015	-1.2%
2008	664,702	-34.4%	506,117	-25.7%
2009	620,673	-6.6%	415,000	-18.0%
2010	564,303	-9.1%	433,000	4.3%
2011	507,400	-10.0%	439,000	1.4%
2012	519,300	2.3%	422,000	-3.9%
2013	730,000	13.2%	535,000	21.9%
2014	795,000	8.9%	582,000	8.8%
2015	811,500	2.1%	609,000	4.6%
2016	839,750	3.5%	645,000	5.9%
2017	879,000	4.7%	685,000	6.2%
2018	924,000	5.1%	725,000	5.8%
2019	959,500	3.8%	740,000	2.1%
2020	1,000,750	4.3%	771,750	4.3%
2021	1,152,750	15.2%	889,000	15.2%
Year	**Unincorporated CDPs***		**Orange County**	
July 2022	1,407,500	22.1%	980,000	10.2%
July 2023	1,470,200	4.5%	1,055,000	7.6%

**Average median home sales prices of Unincorporated CDPs including: Coto de Caza, Ladera Ranch, North Tustin, and Rancho Mission Viejo only, not the entire Unincorporated area.*
Source: SCAG Local Profiles Dataset, 2021, Redfin

The table shows that the median price for resale homes in the Unincorporated areas in 2020 was $1,000,750 while the median price countywide was $771,750 and these numbers have only gone up in 2022 and 2023, with the median price in Unincorporated areas rising to $1,407,500 and $1,470,200 respectively and the median price countywide rose to $980,000 in 2022 and $1,055,000 in mid-2023. These trends are consistent with the rapid increase in home prices observed statewide beginning in 2020 which have only continued, with the median home price in Orange County consistently $150,000 to $200,000 higher than the median home price statewide from late 2018 through September 2023. Based on the estimated affordable purchase prices

shown in **Table 2-26** those units below the median sale price could be affordable to lower- or moderate-income households. These data illustrate the fact that public subsidies are generally required to reduce sales prices to a level that is affordable to very low-income buyers. Absent public subsidies or other programs to reduce the sales price of homes, the average sales price throughout Orange County exceeds what is generally affordable to extremely low-, very low-, and low-income households. To assist low-income home buyers, get into their first home, the County's Mortgage Assistance Program provides silent (deferred payment) down payment loans. (See Section 5 Housing Action Plan.)

Based on a comparison of the affordable rent and purchase amounts for each income category in **Table 2-26** with the median price of homes and gross rent as shown in **Table 2-27,** since 2015, home prices throughout Orange County, including the Unincorporated areas, have increased at a faster rate than household income. The number of households that can comfortably afford the median priced home has declined since 2015, particularly when it comes to extremely low- and very low-income households. Programs to assist lower-income households (extremely low-, very low-, low-, moderate-income) first-time buyers could help narrow the affordability gap.

Rental Housing

According to the American Community Survey data for Orange County as a whole, monthly median gross rent in Orange County reached a countywide total of $1,854 and $2,261 in Unincorporated areas in 2019. As **Tables 2-27 and 2-28** show, the median gross rent has increased for all unit sizes, except 4-bedroom units in Unincorporated CDPs, between 2015 and 2019 for Orange County and Unincorporated CDPs. In Orange County as a whole, studio apartments experienced the most rent increase with an approximate 30 % increase since 2015, while 3-bedroom units in the Unincorporated CDPs experienced the greatest rent increase since 2015. In Orange County as a whole, units with at least 5 bedrooms had the lowest percent increase at 13.1 % and in the Unincorporated CDPs, 4-bedroom units saw a 7.1 % reduction in price. Overall, the median gross rent increased by 19.8 % between 2015 and 2019 in Orange County as a whole and increased to a greater degree, 25.3 %, in Unincorporated Orange County. Real estate professionals expect rents to continue rising in the near future as growing demand exceeds the pace of new apartment construction.

Table 2-27
Median Gross Rent by Bedrooms in Orange County (2015-2019)

Unit-Based Size	2015	2016	2017	2018	2019	% Change 2015-2019
Studio	$1,115	$1,164	$1,256	$1,358	$1,457	30.7%
1 Bedroom	$1,255	$1,307	$1,384	$1,479	$1,574	25.4%
2 Bedrooms	$1,572	$1,627	$1,711	$1,794	$1,869	18.9%
3 Bedrooms	$2,054	$2,130	$2,185	$2,277	$2,372	15.5%
4 Bedrooms	$2,391	$2,441	$2,535	$2,617	$2,741	14.6%
5 or More Bedrooms	$2,472	$2,639	$2,624	$2,655	$2,796	13.1%
Median Gross Rent	**$1,548**	**$1,608**	**$1,693**	**$1,777**	**$1,854**	**19.8%**

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

Table 2-28
Median Gross Rent by Bedrooms in Unincorporated CDPs (2015-2019)

Unit-Based Size	2015	2016	2017	2018	2019	% Change 2015-2019
Studio	$1,108	$1,074	$1,615	$1,288	$1,331	20.1%
1 Bedroom	$1,348	$1,632	$1,892	$1,773	$1,838	36.4%
2 Bedrooms	$1,787	$1,753	$1,745	$1,863	$2,311	29.3%
3 Bedrooms	$2,285	$2,600	$2,458	$2,471	$3,150	37.9%
4 Bedrooms	$2,983	$2,900	$3,080	$2,790	$2,771	-7.1%
5 or More Bedrooms	$2,571	$3,030	$3,061	$3,464	$3,342	30.0%
Median Gross Rent	**$1,805**	**$1,956**	**$2,037**	**$2,208**	**$2,261**	**25.3%**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

When market rents are compared to the amounts lower-income households can afford to pay (as shown in **Table 2-25**), it is clear that very low- and extremely low-income households have a difficult time finding housing without overpaying. The gap between market rent for an average apartment and affordable rent at the very low-income level is about $400 per month, while the gap at the extremely low-income level is $881 per month. However, at the low-income and moderate-income levels, households have a much better chance of finding affordable rentals. The affordable payment for a 4-person low-income household falls between $1,205 and $1,926. Since 2015, average rental costs have increased at a faster rate than household income. The number of households that can comfortably afford the median gross rent throughout the County has declined since 2015 as shown by the percent change median gross rent increase of 19.8% in Orange County as a whole and 25.3% in Unincorporated CDPs between 2015 and 2019 as

compared to the highest affordable rent based on income for a low-income household being $2,561. Programs to assist extremely low- and very low-income renters could help narrow the affordability gap. See Strategy 1f, previous Housing Action Plan. The County also administers many funding programs to assist with the affordability gap including:

- HOME Funds used for tenant-based rental assistance and/or property acquisition; Community Development Block Grants which provide homebuyer assistance.
- Mortgage Credit Certificate Program, which provides first-time homebuyers with a tax credit of up to 15% of the mortgage interest paid for the year based on a percentage of the interest paid on their mortgage.
- Down Payment Assistance Loans for first-time homebuyers, which may be used in conjunction with the Mortgage Credit Certificate Program.
- Section 8 Housing Choice Voucher Program, which provides monthly housing assistance payments to assist extremely low- and very low-income families, elderly, and disabled persons with their rent payments that typically represents the difference between 30% of the recipient's adjusted monthly income and the federally approved Fair Market Rents, locally established Payment Standards, or the owner's Gross Rent, whichever is less.
- Housing Opportunities for Persons with AIDS funds which can be used for either project-based or tenant-based rental assistance, or short-term rent, mortgage, and utility payments, and other items.
- CalHome funds which can be used to assist with down payments, mortgage financing, homebuyer counseling, and technical assistance.
- California Emergency Solutions and Housing funds which can be used to provide housing stabilization services, including rental assistance.
- Housing for a Healthy California funding which can be used to provide rental subsidies and rental assistance for existing and new supportive housing opportunities for those who are chronically homeless or homeless.
- Permanent Local Housing Allocation funds, which can be used to provide rental assistance to individuals who would otherwise be at risk of homelessness or to provide down payment assistance.
- Transitional Housing Program funding, which can be used to help young adults aged 18 to 25 years of age in securing and maintaining housing.
- Funding through the California Housing Finance Agency to provide below-market interest rate mortgages to first-time homebuyers through approved private lenders.

- Funding through the California Housing Finance Agency to finance the construction or substantial rehabilitation of projects containing 20 or more housing units, with 20% of the units set aside for low-income tenants at affordable rents for at least 15 years to however long the mortgage is outstanding on the building.
- The Orange County Mortgage Assistance Program provides silent (deferred payment) down payment assistance loans to assist low-income first-time homebuyers whose annual income is 80% or less of the Area Median Income for eligible families in the Unincorporated areas and in participating cities.

Through these funding programs, and other programs which are specifically aimed at increasing the supply of affordable housing (both rental and for sale), the County aims to narrow the affordability gap for both residents in the Unincorporated areas and in surrounding incorporated cities.

Housing Needs

The following analysis of current housing conditions in Unincorporated Orange County presents housing needs and concerns relative to various segments of the population. This analysis relies in part on the County's Consolidated Plan (for Fiscal Years 2020-2024, adopted by the Board of Supervisors on June 23, 2020), which addresses the needs of the lower-income segment of the community and strategies to address those needs.

Several factors will influence the need for new housing in Orange County in coming years. The three major needs categories considered in this element include:

- Existing housing needs resulting from the overcrowding, overpayment, or substandard housing conditions.
- Housing needs of "special needs groups" such as the elderly, large families, people experiencing homelessness, and disabled.
- Housing needs resulting from population growth.

Demographic and market conditions analysis indicates that the number of households at the extreme ends of the income spectrum will continue to grow ("polarization of income" phenomenon), while the traditional middle income segments' participation in the housing market will decline both in size and activity.

In terms of specific housing needs, home ownership and first-time homebuyer programs are important for moderate- to above-moderate-income population in achieving home ownership. Lower-income groups will need the most assistance in meeting the increasingly higher cost burdens associated with owning a home, but for the most part these groups will be unable to

purchase homes in the County. The needs of lower-income groups, therefore, are usually met by the rental market.

In sum, since Orange County has a large population of affluent homeowners, greater attention needs to be placed on the affordability gap in the resale of smaller and lower priced homes to lower-income and first-time homebuyers. Attention will need to be placed in creating more opportunities for larger families in the rental market as well.

Overcrowding and Overpayment

Overcrowding and overpayment are indicators of barriers to housing and may additionally indicate imbalances in the existing housing demand and available stock. Both may help identify existing housing conditions that need to be addressed as well as households with housing cost burdens or unmet housing needs.

Housing is generally the single greatest expense for California families, and for households that are strained by housing costs, they may compensate by occupying smaller or insufficiently sized dwellings. Where there is more than one person occupying a room (excluding bathrooms and kitchens), a unit is considered overcrowded and health and safety concerns increase, and stress on the condition of existing housing stock and infrastructure increases as well.

Overcrowding

Overcrowding is often closely related to household income and the cost of housing. The U.S. Census Bureau considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, with severe overcrowding when there are more than 1.5 occupants per room. **Table 2-29** summarizes recent Census estimates of overcrowding for the Unincorporated areas as compared to the entire county.

Table 2-29
Overcrowding in Orange County and Unincorporated Areas

	2009		2015		2019	
	Unincorporated Areas	Orange County	Unincorporated CDPs Only*	Orange County	Unincorporated Areas	Orange County
Owner-Occupied Households	32,473	598,752	29,699	582,151	32,263	595,272
1.0+/Room Owner	548 1.7%	18,515 3.1%	546 1.8%	16,678 2.9%	725 2.2%	15,700 2.6%
1.5+/Room Owner	157 0.5%	6,423 1.1%	265 0.9%	5,679 1.0%	207 0.6%	6,186 1.0%
Renter-Occupied Households	7,322	375,249	10,852	427,202	9,354	442,220
1.0+/Room Renter	422 5.8%	38,259 10.2%	943 8.7%	43,665 10.2%	948 10.1%	43,328 9.8%
1.5+/Room Renter	344 4.7%	24,594 6.6%	563 5.2%	25,572 6.0%	257 2.7%	26,468 6.0%

Source: American Community Survey, 5-Year Estimates, 2009, 2015, 2019 and SCAG Pre-Certified Local Housing Data, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.*

Overcrowding was much more prevalent among renters than for owner-occupied units in both the Unincorporated areas and Orange County as a whole. Between 2009 and 2019, between 2.7% and 5.2% of renter households within the Unincorporated areas experienced overcrowding, a lower rate than experienced elsewhere in Orange County (between 6 and 6.6%). However, owner-occupied households experienced between 0.5% and 0.9% overcrowding during the same period in the Unincorporated areas. This indicates a demand for more rental housing within the Unincorporated areas and within Orange County as a whole, while supply remains tight. Notably, however, the overcrowding within the Unincorporated areas is less severe than Orange County as a whole. Programs removing barriers to the construction of more rental housing, such as existing policies streamlining the permit process for accessory dwelling units or duplexes, may assist in increasing the supply of rental housing to address overcrowding. Additionally, rental assistance programs may be able to reduce the barriers to extremely low- and very low-income households renting a unit with sufficient rooms. Existing funding sources incentivize both new and existing landlords to sign new renters that benefit from housing assistance and provide further assistance to renters to help defer move-in costs.

Overpayment

According to State housing policy, overpaying occurs when housing costs exceed 30% of gross household income. **Table 2-30** displays recent estimates of households in Unincorporated CDPs that are overpaying for housing. According to SCAG, and as shown in **Table 2-31**, over 50% of all renter households in the Unincorporated areas were overpaying for housing. **Table 2-32**

displays mortgage-holding households (owners) in the Unincorporated areas overpaying for housing. Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For lower-income renters, severe cost burden can require families to double up resulting in overcrowding and related problems.

Table 2-30
Household Cost Burden – Unincorporated CDPs and Orange County

Income	Orange County		Unincorporated CDPs	
	Household Cost Burden		Household Cost Burden	
	>30%	>50%	>30%	>50%
Household Income less-than or = 30% MFI	135,715	114,560	1,960	1,685
Household Income >30% to less-than or = 50% MFI	101,280	48,175	1,590	1,125
Household Income >50% to less-than or = 80% MFI	97,005	22,425	2,350	1,030
Household Income >80% to less-than or = 100% MFI	33,515	4,100	1,160	210
Household Income >100% MFI	40,440	3,670	2,600	400
Total Households	407,955	192,930	9,660	4,454

Source: HUD CHAS, 2019
Note: MFI refers to the HUD Area Median Family 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. MFI 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.
Note: MFI in Orange County in 2019 was $97,900 as determined by HUD
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Table 2-31
Renter Overpayment by Income Category
Unincorporated Orange County

% of Income Paid for Housing	Renters	
	Households	%
All households	9,354	100.0%
Less than 10%	265	2.83%
10-14.9%	776	8.30%
15-19.9%	686	7.33%
20-24.9%	1,035	11.06%
25-29.9%	1,023	10.94%
30-34.9%	1,029	11.0%
35-35.9%	695	7.43%
40-49.9%	853	9.12%
50% or more	2,328	24.89%
Not computed	664	7.10%
Households overpaying	4,905	52.40%
Source: SCAG Pre-Certified Local Housing Data – August 2020		

Table 2-32
Homeowner Overpayment by Income –
Unincorporated Orange County

% of Income Paid for Housing	Number of Households by Annual Income				
	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 or more
Over 30%	499	635	714	1,834	5,485
20-29%	0	21	64	209	6,904
Under 20%	0	0	15	194	8,192
Source: SCAG Pre-Certified Local Housing Data – August 2020					

As the above tables demonstrate, 1,960 households in Unincorporated Orange County areas making less than 30% of the AMI are having to pay more than 30% of their income to household costs. According to SCAG Pre-Certified Local Housing Data, there are a total of 41,617 households in Unincorporated Orange County. Thus, 4.7% of all households in Unincorporated Orange County areas have to pay more than 30% of their income to household costs. This means that extremely and very low-income households are disproportionately impacted by overpayment in Unincorporated areas. In addition, 52.44% of renters in Unincorporated areas pay 30% or more of their income for rental costs. These numbers demonstrate that more than 50% of renters are overpaying, which again, disproportionately impacts lower-income households. According to

SCAG data, 9,167 households or 22% of mortgage holding (homeowner) households in Orange County pay more 30% or more of their income for housing costs. According to SCAG data, 5,485 homeowners, or 22% of all homeowners covered in **Table 2-32**, making $75,000 or more are still paying more than 30% of their income towards housing costs. Approximately 7% of all households in Unincorporated areas making less than $50,000 per year are paying over 30% of their incomes to housing costs.

According to the most recent *Orange County Analysis of Impediments To Fair Housing Choice, April 2020* (Orange County AI), "[t]here are 194,569 households in [all of] Orange County experiencing housing cost burden, with monthly housing costs exceeding 30 % of monthly income. 104,196 of these households are families. However, Orange County has only 429 Project-Based Section 8 units and 33 Other Multifamily units with more than one bedroom capable of housing these families. Housing Choice Vouchers are the most utilized form of publicly supported housing for families, with 2,286 multi-bedroom units accessed. Large family households are also disproportionately affected by housing problems as compared with non-family households. Some focus groups have communicated that regulations and cost issues can make Orange County too expensive for families. The high percentage of 0-1- bedroom units in publicly supported housing and the low percentage of households with children in publicly supported housing support this observation."

Based on the data, the households experiencing monthly housing costs exceeding 30% of monthly income in Unincorporated Orange County areas make up only 1% of the households in all of Orange County facing household cost burden. This is not a significant percentage demonstrating that the Unincorporated Orange County areas do not face significant cost burden challenges compared to other jurisdictions in the County.

Table 2-33
Publicly Supported Housing Units by Program Category, Orange County

Housing Units	Number	% of Households Experiencing Cost Burden
Total Households Experiencing Housing Cost Burden	194,569	-
Publicly Supported Housing Units		
- Public Housing	N/A	N/A
- Project-based Section 8	429	0.22%
- Other Multifamily	33	0.02%
- HCV Program	2,286	1.2%
- LITHC	2,110	1.1%

Source: HUD Inventory Management System (IMS)/PIH Information Center (PIC),

Table 2-34
Publicly Supported Housing Demographics, Orange County

	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Project-Based Section 8	164	40.80%	9	2.24%	88	21.89%	138	34.33%
Other Multifamily	22	95.65%	0	0.00%	1	4.35%	0	0.00%
HCV Program	808	35.96%	156	6.94%	412	18.34%	866	38.54%
LIHTC	1,352	25.12%	254	4.72%	1,621	30.11%	991	18.41%
Total Households	140,530	67.71%	2,907	1.40%	30,185	14.54%	29,767	14.34%
0-30% of AMI	14,094	61.62%	259	1.13%	4,388	19.18%	3,541	15.48%
0-50% of AMI	23,293	50.78%	503	1.10%	9,148	19.94%	6,728	14.67%
0-80% of AMI	43,952	56.98%	926	1.20%	14,322	18.57%	11,131	14.43%

Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

Tables 2-33 and **2-34,** above, show the total numbers and percentages of different kinds of affordable housing supported by funding that the County facilitates. The numbers vary between the two tables, because of the slightly different information they track, and because they were compiled by different sources in different years. However, taken together, they show that the largest percentage of publicly supported housing is supported by the Housing Choice Voucher (HCV) program, followed by the Low-Income Housing Tax Credit (LIHTC) program, with Section 8 project-based vouchers and other forms of multifamily public housing support falling significantly behind in terms of the total number of housing units each of those funding programs support. The data also indicates that the largest amount of support provided by public housing programs goes to White households, followed by Hispanic and Asian or Pacific Islander households.

As shown in **Table 2-34,** in Project-Based Section 8 developments, the majority racial/ethnic group in Orange County as a whole is either White or Asian/Pacific Islander. Housing Choice Voucher households are the most evenly distributed across racial/ethnic groups. According to the Orange County AI, Asian American or Pacific Islanders make up a majority of HCV units in Westminster, Fountain Valley, and Garden Grove, and a majority in Santa Ana. They also make up a plurality in Orange County, followed closely by White residents.

County Programs to Encourage Development of Affordable Housing

Several County programs encourage and assist in the development of affordable housing and relieve overpayment. Those programs are described in brief below and are incorporated into the Housing Action Plan in Section 5.

Housing Opportunities Overlay Zone (see Program 1):

The goal of the Housing Opportunities Overlay Zone is to facilitate the development of affordable housing units on underutilized non-residentially zoned land in the Unincorporated areas by allowing for residential uses on commercial and industrial zoned sites. The Board of Supervisors adopted the Housing Opportunities Overlay Zone regulations on January 10, 2006. To provide guidelines for the development of Housing Opportunity sites, the Planning Commission approved the Housing Opportunities Manual on June 21, 2006.

The Housing Opportunities Overlay Zone allows affordable housing development by-right (i.e., without a Use Permit) in the following commercial and industrial districts:

- C1 – Local Business.
- C2 – General Business
- CC – Community Commercial[3]
- CH – Commercial Highway[4]
- CN – Commercial Neighborhood.
- M1 – Light Industrial
- MX – Mixed-Use

The Housing Opportunities Overlay Zone's affordability requirements include the following criteria:

- Rental projects.
- 100% of the units must be affordable to low- and very low-income households (70% low-income and 30% very low-income) for at least 55 years.
- For sites located within a commercial or industrial zoning district, the site development standards for the R3 "Apartment" District shall apply except that the base density shall be 70 dwelling units per acre (net development area) and maximum building height shall be sixty-five (65) feet.

If necessary to make the project economically feasible, the County offers the following incentives:

- Density bonus.

[3] On June 25, 2024, the Board of Supervisors approved a zone change that rezoned the Commercial and Residential Professional Zoning Districts to the Mixed-Use Zoning District. While only a few C1 and C2 zoned parcels remain, all other Commercial (CC and CH) and Residential Professional Zone Districts have been rezoned to the Mixed-Use Zoning District.

[4] Ibid.

- Setback reduction.
- Increased maximum lot coverage.
- Increased building height.

Although not considered an incentive, the County also offers alternative (reduced) parking requirements for residential development within the Housing Opportunities Overlay Zone.

On December 9, 2008, the Board of Supervisors adopted a Zoning Code amendment extending the Housing Opportunities Overlay Zone regulations to multifamily districts:

- R2 – Multifamily Dwelling.
- R3 – Apartment.
- R4 – Suburban Multifamily
- RP – Residential Professional[5]

On July 28, 2020, the Board of Supervisors adopted a Zoning Code amendment to increase the base density from 25 to 43.5 dwelling units per acre (du/ac).

On September 27, 2022, the Board of Supervisors, in compliance with State law requiring that any necessary rezoning to accommodate RHNA be completed by October 15, 2022, adopted a Zoning Code amendment to increase the base density in the Housing Opportunities Overlay Zone from 43.5 to 70 du/ac, excluding any applicable density bonus units. On June 25, 2024, the Board of Supervisors adopted a Zone Change to include a Mixed-Use District to be included in the Housing Opportunities Overlay.

Since the adoption of the Housing Opportunities Overlay Zone, eight projects (within the Housing Opportunities Overlay Zone) with a total of 306 affordable units have been approved, which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families (see Table A-3). The average density of these projects has been over 37.68 units per acre as compared to the initial base density of 25 units per acre. Appendix B contains a detailed discussion of the additional development capacity of parcels in the Housing Opportunities Overlay Zone.

Density Bonus (see Program 5):

Beyond local requirements, California law allows for a 35% increase in the density of a residential development when a housing developer agrees to construct any of the following: a minimum of 20% of the total units of a housing development for lower-income households or 10% of the total units for very low-income households. A senior housing development is also

[5] Ibid.

eligible for a 20% density bonus if it includes at least 35 dwelling units, and the applicant seeks a density bonus.

The County must also provide at least one of the following:

- A reduction in site development standards or a modification of zoning code requirements or architectural design requirements that exceed the minimum building standards approved by the California Building Standards Commission.
- Approval of mixed-use zoning in conjunction with the housing project if commercial, office, industrial, or other land uses will reduce the cost of the housing development and if the commercial, office, industrial, or other land uses are compatible with the housing project.
- Other regulatory incentives or concessions proposed by the developer or the city, county, or city and county that result in identifiable cost reductions.

Table 2-35, below, shows a summary of the affordable projects that have been developed within Orange County between 2006 and 2022 at various densities ranging from 12 to 63.4 dwelling units per acre. A significant portion of these projects have been successfully developed at densities of 20 to 25 units per acre, which demonstrates that the existing allowable densities are not an issue and that affordable developments may also benefit from density bonuses as a means of providing additional affordable units.

Funding Resources to Encourage Development of Affordable Housing (see Program 11):

The County has a variety of funding resources available to address affordable housing and overpayment. Each funding resource is described in detail in the Housing Action Plan, but the potential programs are listed here as relevant to overpayment and affordability: HOME Funds, Community Development Block Grant Program, Section 108 Program, Mortgage Credit Certificate Program, Section 8 Housing Assistance Program, Affordable Housing and Sustainable Communities Program, CALHOME, Golden State Acquisition Fund, Local Housing Trust Fund, Multifamily Housing Program, National Housing Trust Fund, Permanent Local Housing Allocation, Predevelopment Loan Program, Supportive Housing Multifamily Housing Program, California Housing Finance Agency, Low-Income Housing Tax Credit, Orange County Housing Trust, Orange County Housing Finance Trust, and the County's Mortgage Assistance Program. **Table 2-35**, below, is a list of the affordable projects that have received funding from the County and been developed within Orange County between 2006 and 2022.

Table 2-35
Affordable Projects That Received Funding from County of Orange
Built or Acquired 2006 – 2022

Project/ Location	Year Built or Acquired	Total Units	General Plan	Zoning	Allowable Density (du/ac)	Project Density (du/ac)	Affordability/ Assistance Level	Funding
Laguna Canyon/Irvine	2006	120	Unknown	Med. Density Residential	Unknown	20.98	30 and 50%	2002 NOFA
Ability First Apartments/ Irvine	2008	24	Med. Density Residential	Med. Density Residential	Unknown	12	30% AMI	2001 NOFA
Dorado Senior Apartments/ Buena Park	2007	150	Unknown	Commercial	Unknown	62	30,50 and 60% AMI	2006 NOFA
Stratford Place and Windsor Court	2005	86	Unknown	Unknown	Unknown	28.01	30,50 and 60% AMI	ATT 5.21.02 RFP
Northwood Apartments/ Irvine	2006	96	Medium High Density Residential	Medium-High Density Residential	Unknown	20.96	30 & 50% AMI	2002-B NOFA
Montecito Vista Apartments/ Irvine	2006	162	Unknown	Research and Industrial	Unknown	22.98	30,50 and 60% AMI	2005 NOFA
Cornerstone Apartment Homes/ Anaheim	2007	49	Suburban Residential	CN – Commercial Neighborhood and Housing Opportunities Overlay Zone	25	33.8	30,50 and 60% AMI	2005 NOFA
Granite Court	2008	71	Unknown	Unknown	Unknown	Unknown	30,50 and 60% AMI	2004 NOFA & Apartment Development Revenue Bonds, Issue A of 2007
Woodbury NE Apartments	2008	150	Unknown	Unknown	Unknown	Unknown	30,40 and 50% AMI	2005 NOFA
Birch Hills Apartment Homes	2012	114	Unknown	Unknown	Unknown	Unknown	30, 45 and 50% AMI	2010 NOFA
Buena Vista Apartments	2011	17	Suburban Residential	C2 General Business District	25	33.8	30, 40 and 60% AMI	2010 NOFA
Stonegate I Apartments	2009	38	Suburban Residential	C1 Local Business District	25	33.8	30, 40, 50 and 60% AMI	2008-B NOFA
Stonegate II Apartments	2009	26	Suburban Residential	C1 Local Business District	25	33.8	30, 40, 50 and 60% AMI	2008-B NOFA
San Clemente Senior Apartments	2012	76	Unknown	Unknown	Unknown	Unknown	30 & 50% AMI	2010 NOFA
Doria Apartment Homes Phase I	2011	60	Unknown	Unknown	Unknown	Unknown	30, 45 and 60% AMI	2008-B NOFA
Avenida Villas	2011	29	Suburban Residential	R3 Apartment District	43	35.4	30% AMI	2010 NOFA
Diamond Aisle Apartments	2009	25	Unknown	Unknown	Unknown	Unknown	30% AMI	2006 NOFA
Bonterra Apartment Homes	2010	94	Suburban Residential	Planned Community	Unknown	21	30, 35, 50 and 60% AMI	2005 NOFA
Cerritos Family Apartments	2012	60	Suburban Residential	R2 Multifamily Dwelling District	43	30	50% and 80% AMI	2010 NOFA
Potter's Lane	2017	16	Community	C2 General Business	25	39	30% AMI	2014 NOFA
Heroes' Landing	2020	76	Commercial	Unknown	Unknown	Unknown	30% AMI	SNHP, 2014 NOFA
Casa Querencia	2021	57	Unknown	Unknown	Unknown	Unknown	30% and 60% AMI	SNHP, 2014 NOFA
Placentia Veterans Village	2020	50	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA
Salerno at Cypress Village	2020	80	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA
Buena Esparanza	2021	70	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA SNHP
Della Rosa	2020	50	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	2016 NOFA
Santa Ana Arts Collective	2020	58	Unknown	Unknown	Unknown	Unknown	30, 35, 40, and 60% AMI	SNHP, 2020 NOFA
Westminster Crossing	2021	65	Unknown	Unknown	Unknown	Unknown	20 and 70% AMI	SNHP, 2016 & 2020 NOFA

Table 2-35
Affordable Projects That Received Funding from County of Orange
Built or Acquired 2006 – 2022

Project/ Location	Year Built or Acquired	Total Units	General Plan	Zoning	Allowable Density (du/ac)	Project Density (du/ac)	Affordability/ Assistance Level	Funding
Altrudy Senior Apartments	2021	48	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
FX Residences	2022	17	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
Legacy Square	2023	93	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
Fountain Valley Housing	2022	50	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
Casa Paloma	2022	71	Unknown	General Business	25	95	30 and 50% AMI	2016 NOFA
The Groves	2022	75	Community Commercial	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
The Crossroads at Washington	2023	86	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
Villa St. Joseph	2023	50	Unknown	Unknown	Unknown	Unknown	20% AMI	NPLH & 2020 NOFA
Airport Inn	2021	58	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 & 2020 NOFA
Mountain View	2023	71	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
WISEPlace Supportive Housing	2024	52	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Cartwright Family Apartments	2023	60	Unknown	Unknown	Unknown	Unknown	30%-80% AMI	2020 NOFA
Lincoln Avenue Apartments	2023	55	Unknown	Unknown	Unknown	Unknown	30, 50, 60, and 70% AMI	SNHP
Santa Angelina Senior Community	2023	65	Unknown	Unknown	Unknown	Unknown	25 and 60% AMI	2020 NOFA
Orchard View Gardens	2023	66	Unknown	Unknown	Unknown	Unknown	30%-60% AMI	SNHP & 2020 NOFA
Center of Hope/The Salvation Army	2022	72	Unknown	Unknown	Unknown	Unknown	25 and 30% AMI	SNHP, NPLH & 2020 NOFA
Westview House	2023	85	Unknown	Unknown	Unknown	Unknown	30 and 60% AMI	SNHP, NPLH & 2020 NOFA
Huntington Beach Senior Housing	2023	43	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	SNHP, NPLH & 2020 NOFA
Paseo Adelanto	2023	50	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	2020 NOFA
Valencia Gardens Orange Corporate Yard	2023	62	Unknown	Unknown	Unknown	Unknown	30 and 60% AMI	2020 NOFA
The Meadows	2021	65	Unknown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	2020 NOFA
North Harbor Village	2022	91	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #1: Stanton Inn	2020	72	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #2: Tahiti Motel	2020	60	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #3: Riviera Motel	2020	21	Unknown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	2020 NOFA
Homekey Property #4: HB Oasis	2020	64	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #5: Motel 6	2020	88	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Miraflores	2022	86	Unknown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	MHSA from OCHFT

Source: OC Community Resources/Housing, June 16, 2023

Accessory Dwelling Units (ADUs)(see Program 7)

In response to state-mandated requirements and local needs, the County permits a property owner in any district, including planned community and specific plan areas, where a single-

family unit exists on a parcel zoned for such purposes, to apply to establish an accessory dwelling unit (ADU) along with junior accessory dwelling unit (if owner occupied) by-right.

The definition of ADUs and JADUs are provided below:

"Accessory dwelling unit" (ADU) is defined as a dwelling unit providing complete independent living facilities for one (1) or more persons that is located on a parcel with another primary, single-family dwelling as defined by Government Code Section 65852.2, as may be amended. It shall include permanent *provisions* for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling's location. An ADU may be within the same structure as the primary unit, in an attached structure, or in a separate structure on the same parcel. This use is distinguished from a duplex.

"Junior Accessory Dwelling Unit" (JADU) is defined as a unit that is no more than five hundred (500) square feet in size and contained entirely within an existing or proposed single-family dwelling unit, pursuant to California Government Code Section 65852.22, as may be amended. A JADU shall include an efficiency kitchen (sink, cooking appliances, food preparation counter, and storage cabinets) and may include separate, or may share sanitation facilities with the existing structure.

Accessory dwelling units are also permitted on existing multifamily residential projects. State regulations also changed to allow property owners to convert existing garages and structures into ADUs and the County allows this change. Each ADU is required to have a separate address.

Accessory dwelling units serve to augment resources for senior housing, or other low- and moderate-income segments of the population. The development standards are reasonable to ensure neighborhood compatibility, and with the proposed amendment, will not present an unreasonable constraint to development.

In July 2020, the County's Comprehensive Zoning Code was updated in accordance with the October 2019 passage of California Assembly Bill AB 68 (AB 68), Assembly Bill 881 (AB 881), Assembly Bill 587 (AB 587), Assembly Bill 671 (AB 671), and Senate Bill 13 (SB 13). The provisions encourage the development of ADUs by making the process less restrictive for homeowners.

As of November 27, 2023, the County of Orange has issued a total of 235 ADU permits (ADU and JADUs included) in Unincorporated areas since 2020. **Table 2-36** below includes a breakdown of permits issued by the County starting in 2020 to November 2023.

Table 2-36
Issued ADU/JADU Permits 2020-2023

Unincorporated Areas	Year			
	2020	2021	2022	2023
Anaheim	9	18	22	16
Coto de Caza	0	1	0	2
Garden Grove	2	0	0	1
Ladera Ranch	1	1	1	0
Midway City	15	8	6	14
North Tustin	7	3	7	6
Orange	4	4	4	8
Rossmoor	2	7	2	4
Santa Ana	9	16	18	15
Silverado	0	1	0	0
Trabuco Canyon	0	1	0	0
Year Total	49	60	60	66
Total All Years	235			

Source: OC Development Services, November 2023

State mandates, the Comprehensive Zoning Code update, pre-approved ADUs plans, and permitting demonstrate an upward trend for ADU development within the County. The continued development of ADUs and JADUs offers another opportunity to address the need for additional very low-, low-, and moderate-income rental housing. This coincides with statewide trends showing an increase in the issuance of ADU or JADU permits since ADUs were first authorized for ministerial approval by state legislation in 2016.

Other Housing Choices:

Mobile Homes/Manufactured Housing

There is often an economy of scale in manufacturing homes in a plant rather than on site, thereby reducing cost. State law precludes local governments from prohibiting the installation of mobile or manufactured homes on permanent foundations on single-family lots. It also declares a mobile home park to be a permitted land use on any land planned and zoned for residential use and prohibits requiring the average density in a new mobile home park to be less than permitted by the Zoning Code.

In accordance with zoning regulations, the County has determined that like single-family homes, mobile homes and manufactured housing are principally permitted in all residential zones. The number of mobile home or manufactured dwelling units permitted, as well as minimum setback

requirements, are the same as the maximum number of dwelling units and setback requirements permitted by the applicable district regulations. Off-street parking is consistent with the regulations found above, except as follows: Two (2) parking spaces for each mobile home dwelling unit; and one (1) parking space for each four (4) mobile home units to allow for additional guest parking.

Also, there are additional screening and landscaping requirements, and supplemental design criteria for mobile or manufactured home developments. The approving authority may grant exceptions if special circumstances are warranted, or if the requirements become excessive when applied to a specific development.

Boarding Houses

Boarding Houses are allowed by-right (6 or fewer residents) in multifamily residential districts or subject to a Use Permit (more than 6 residents) in the R-3 (apartment) district.

Single Room Occupancy (SRO)

In addition, the County Zoning Code permits the construction of Single Room Occupancy (SRO) facilities in any district where hotels are permitted, subject to approval of a Use Permit. These regulations facilitate the development or conversion of facilities to serve those in need of emergency shelter by expanding the geographic area where suitable facilities may be built and requiring only those conditions that are reasonably necessary to foster sound planning and neighborhood compatibility. The conditions and development standards that are applied to these facilities are no stricter than those for conventional hotel or motel developments.

One SRO-type facility has been built in the Unincorporated areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Future Growth Needs

Overview of the Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is a key tool for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for each planning period. The current planning period is from 2021 to 2029. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

Table 2-37 provides population projections through 2040 for Unincorporated Orange County, as calculated by the Southern California Association of Governments 2016-2040 Regional Growth Forecast. Despite the population of Unincorporated Orange County shrinking by nearly one-quarter, the population of the Unincorporated areas is forecasted to grow by 49.2 %. In comparison, the population of Orange County as a whole is forecasted to grow by only 12.7 %. Population growth is one factor that informs the need for housing in the Unincorporated areas.

Table 2-37
Population Growth Forecast (2012-2040)

Jurisdiction	2012	2020	2035	2040	% Change 2012-2040	Average Annual Growth Rate
Unincorporated Areas	121,160	128,421 +6%	177,900 +38.5%	180,100 +1.2%	48.6%	1.7%
County Total	3,010,232	3,180,491 +5.6%	3,499,000 +10%	3,535,000 +1%	17.4%	0.6%

Source: SCAG 2016-2040 RTP/SCS Final Regional Growth Forecast by Jurisdiction Report

The current RHNA Allocation Plan was adopted by the Southern California Association of Governments (SCAG) in March 2021. The future need for housing is determined primarily by the forecasted growth in households in a community. Each new household, created by a child moving out of a parent's home, by a family moving to a community for employment, and so forth, creates the need for a housing unit. The housing need for new households is then adjusted to maintain a desirable level of vacancy to promote housing choice and mobility.

SCAG must take into consideration the following factors:

- 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.
- Geological and topographical constraints.

An adjustment is also made to account for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors – household growth, vacancy need, and replacement need – determines the construction need for a community. Total housing need is then distributed among four income categories on the basis of the County's

income distribution, with adjustments to avoid an over-concentration of lower-income households in any community.

2021-2029 Growth Needs

The total housing growth need for Unincorporated Orange County during the 2021-2029 planning period is 10,406 units. This total is distributed by income category as shown in **Table 2-38.** Of the 3,139 extremely low- and very low-income unit growth need, half (1,570 units) are estimated to be needed for extremely low-income households during the planning period, as provided by state law.

Table 2-38
Regional Housing Growth Needs – Unincorporated Orange County

Extremely Low	Very Low	Low	Moderate	Above Mod	Total
1,570 units	1,569 units	1,866 units	2,040 units	3,361 units	10,406 units
15.1%	15.1%	17.9%	19.6%	32.3%	100%
Source: SCAG 2021					

A discussion of the County's capacity to accommodate this growth need is provided in **Appendix B, Land Inventory**.

Special Housing Needs

State Housing Law requires that the special needs of certain disadvantaged groups be addressed. These households typically experience difficulty in securing decent, affordable housing, and are not well guarded under market conditions. Many of these groups also fall under the category of extremely low-income households. The needs of the elderly, handicapped, large families, female heads of household, people experiencing homelessness, and farm workers are addressed below:

Extremely Low-Income Households

The HUD Comprehensive Housing Affordability Strategy (CHAS) provides data only on a countywide basis and does not disaggregate it to the jurisdictional level, but data was available for the Unincorporated CDPs (this does not represent all of the Unincorporated areas). **Tables 2-39 and 2-40** below include data characterizing affordability and cost burden and housing problems aside from cost burden for all income groups within Orange County.

Of the extremely low-income households living in Orange County, 122,605 have at least one of the four housing problems (80.4%). The housing problems identified by CHAS include the following:

- Units with physical defects (lacking a complete kitchen or plumbing facilities).
- Overcrowded conditions (housing units with more than one person per bedroom).

- Housing cost burdens exceeding 30% of gross income (including utilities).

Severe housing problems include units with physical defects and overcrowded conditions, as well as more than 1.5 person per bedroom and a cost burden greater than 50%.

Table 2-39
Housing Problems for all Households by Tenure – Unincorporated CDPs

Income by Housing Problem	Household Has at Least 1 of 4 Housing Problems	Household Has None of the 4 Housing Problems or Cost Burden Not Available
Owners		
Less-than or = 30%	850	530
>30% to less-than or = 50% MFI	890	500
>50% to less-than or = 80% MFI	1,625	905
>80% to less-than or = 100% MFI	1,020	715
>100% MFI	2,585	14,200
Total	**6,960**	**16,855**
Renters		
Less-than or = 30%	1,375	415
>30% to less-than or = 50% MFI	755	20
>50% to less-than or = 80% MFI	835	360
>80% to less-than or = 100% MFI	290	324
>100% MFI	185	1,570
Total	**3,430**	**2,695**

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Table 2-40
Housing Problems for all Households by Tenure – Orange County

Income by Housing Problem	Household Has at Least 1 of 4 Housing Problems	Household Has None of the 4 Housing Problems or Cost Burden Not Available
Owners		
Less-than or = 30%	43,745	16,500
>30% to less-than or = 50% MFI	35,095	24,770
>50% to less-than or = 80% MFI	50,045	48,165
>80% to less-than or = 100% MFI	25,385	40,345
>100% MFI	41,810	269,410
Total	**196,080**	**399,190**
Renters		
Less-than or = 30%	95,460	18,910
>30% to less-than or = 50% MFI	74,070	6,800
>50% to less-than or = 80% MFI	64,900	32,070
>80% to less-than or = 100% MFI	16,745	28,610
>100% MFI	12,280	92,375
Total	**263,450**	**178,770**

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

Tables 2-39 and **2-40** demonstrate that 12% of homeowners in the Unincorporated CDPs and 22% in Orange County as a whole earning less than 30% of MFI have at least one housing problem. For renters, the issues are more severe, with 40% of renters in Unincorporated CDPs and 36% in Orange County as a whole earning less than 30% MFI having at least one housing problem. Based on this data, renters could use housing assistance in the Unincorporated CDPs.

Projected Needs

To calculate projected housing need, the County assumes 50% of its very low-income regional housing need is extremely low-income households.

Table 2- 41
Progress Towards Meeting New Housing Need
Unincorporated Orange County 2021-2029

	Extremely Low Income	Very Low	Low*	Moderate*	Above Moderate	Total
Total RHNA 2021-2029	1,570	1,569	1,866	2,040	3,361	10,406
Total Completed Units 10/16/2021 - 12/31/2022	-	21	48	0	325	394
Remaining Units Needed 2021-2029	1,570	1,548	1,818	2,040	3,036	10,012

Source: SCAG RHNA and the County of Orange/OC Development Services, 2023

Available resources to address extremely, very low, and low-income household include, The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs. See Sections 4 and 5 for further details on these programs. The Housing Action Plan addresses the needs of extremely low-income households. However, it must be recognized that the development of new housing for the lowest income groups typically requires large public subsidies, and the level of need is greater than can be met due to funding limitations, especially during these times of declining public revenues.

Elderly Persons

The large demographic group known as "Baby Boomers" born between 1946 and 1964 have played a dominant role in society throughout their lives. The oldest of the Boomers turned 75 in 2021 and the youngest of this group will turn 60 in 2024. The growing wave of elderly retirees will have a huge impact on government, health care and the housing market.

The special housing needs of seniors are an important concern in Orange County. This is especially so since many retired persons are likely to be on fixed, low incomes and at greater risk of housing overpayment. In addition, the elderly have special needs related to housing construction and location. Seniors often require ramps, handrails, lower cupboards, and counters to allow greater access and mobility. In terms of location, because of limited mobility the elderly also typically need access to public facilities (e.g., medical and shopping) and public transit facilities.

Senior citizens also may need special security devices for their homes to allow greater self-protection. In many instances, the elderly prefer to stay in their own dwellings rather than relocate to a retirement community and may require assistance with home repairs and manual

house/yard work. In general, every effort should be made to maintain the dignity, self-respect, and quality of life of senior residents in the County.

Finding reliable transportation to medical appointments, senior centers, meal sites, and shopping remains a serious problem for seniors. Many seniors lack private transportation due to physical or financial limitations.

According to recent American Community Survey estimates, there were 27.4% of owner households and 16.3% of renter households in Unincorporated Orange County where the householder was 65 or older (**Table 2-42**). Many elderly persons are dependent on fixed incomes and/or have a disability. Elderly homeowners may be physically unable to maintain their homes or cope with living alone. The housing needs of this group can be addressed through smaller units, accessory dwelling units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs (see also Section 3 – Constraints for more information on how the County's land use regulations help to facilitate these types of housing options for seniors).

Table 2-42
Elderly Households by Tenure (Owner vs. Renter) - Unincorporated Orange County

	Owners		Renters	
Householder Age	**Households**	**%**	**Households**	**%**
Under 65 years	23,431	72.6%	7,825	83.7%
65 to 74 years	5,332	16.5%	839	9.0%
75 to 84 years	2,372	7.4%	498	5.3%
85 and over	1128	3.5%	192	2.1%
Total 65+ Households	**8,832**	**27.4%**	**1,529**	**16.3%**
Total Unincorporated households	32,263	100.0%	9,354	100.0%

Source: SCAG Local Housing Data Pre-Certified Local Housing Data 2020

Housing for the Elderly

Senior housing projects are a permitted use by right within any residential zoning district. The Zoning Code also provides a density bonus for the construction of senior housing projects. The Zoning Ordinance is not considered to be a constraint to the development of senior housing because the regulations are the same as for other residential uses in the same districts.

Large Families

Household size is an indicator of the need for large units. Large households are defined as those with five or more members. Among both owners and renters, just under half of all Unincorporated area households have only one or two members. About 16% of renter households and about 15% of owner households had five or more members (**Table 2-43**). This

data, together with overcrowding statistics, indicates that although a large proportion of households are small, there is a significant need for large rental units with four or more bedrooms.

Table 2-43
Household Size by Tenure (Owner vs. Renter)
Unincorporated Orange County

	Owners		Renters	
Household Size	Households	%	Households	%
1 person	3,878	12.0%	1,708	18.3%
2 persons	11,293	35.0%	2,457	26.3%
3 persons	5,734	17.8%	2,055	22%
4 persons	6,716	20.8%	1,656	17.7%
5 persons	2,985	9.3%	918	9.8%
6 persons	1,018	3.2%	355	3.8%
7+ persons	639	2%	205	2.2%
Total households	32,263	100%	9,354	100%

Source: American Community Survey, 2014-2018, 5-Year Estimates

Single-Parent Households

Single parent households face different challenges due to the greater need for daycare services, health care services, and other services. An issue observed for female-headed households with no spouse present is a lower average income due to income inequalities present in workplaces.

As seen in **Table 2-44** below, for Orange County as a whole, single parents represent 16.8% of family households (owners and renters), according to 2019 ACS 5-Year Estimates. There are 119,719 single-mother households and 55,032 single-father households in Orange County (11.5% and 5.3%, respectively). In the Unincorporated CDPs, single parents represent 12.7% of family householders. There are 2,824 single-mother households and 966 single-father households (9.4% and 3.2%, respectively).

Female-Headed Households

The U.S. Census Bureau estimates that about 9% of owner households and 15% of renter households in Orange County as a whole, and approximately 7% of owner households and 18% of renter households in the Unincorporated CDPs were headed by a female (**Table 2-44**). In both Orange County as a whole and in the Unincorporated CDPs, female headed households are more common than male-headed households for both homeowners and renters. This data suggests that while female-households occur at a lower rate than married couple family households and non-family households, female-headed households occur at a higher rate than male-headed households, and that within the Unincorporated CDPs specifically, female-headed households

represent a higher proportion of renters than in Orange County as a whole, indicating that some of the rental demand within the Unincorporated areas is driven by female-headed households.

Table 2-44
Household Type by Tenure (Owner vs. Renter) Unincorporated CDPs and Orange County

Family Household Type	Unincorporated CDPs				Orange County			
	Owners		Renters		Owners		Renters	
	Households	%	Households	%	Households	%	Households	%
Married couple family	18,217	76.49%	2,962	48.38%	385,611	64.8%	183,649	41.5
Male householder, no spouse present, family	588	2.47%	378	6.17%	23,491	3.9%	31,541	7.1%
Female householder, no spouse present, family	1,698	7.13%	1,126	18.39%	51,654	8.7%	68,065	15.4%
Non-family households	3,313	13.91%	1,656	27.05%	134,516	22.6%	158,965	35.9%
Total households	23,816	100.00%	6,122	100.00%	595,272	100%	442,220	100%

Source: American Community Survey 5-Year Estimates, 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Students

The need for student housing is another significant factor affecting housing demand. Student housing often only produces a temporary housing need based on the duration of the educational institution enrolled in. The impact on housing demand is often increased in areas surrounding universities and colleges. According to 2019 American Community Survey 5-Year Estimates, there are approximately 231,636 students in Orange County enrolled in undergraduate programs and 48,691 enrolled in graduate or professional programs. Together, this makes up just under 33% of the population over 3 years of age enrolled in school. There are no local universities within Unincorporated Orange County; however, some of the units in the Unincorporated County may be utilized as student housing for local universities within neighboring jurisdictions. Students may seek shared housing situations to decrease expenses and can be assisted through roommate referral services offered on and off campus. College graduates provide a specialized pool of skilled labor that is vital to the economy; however, a lack of affordable housing may lead to their departure post-graduation.

Persons with Disabilities

Access and affordability are the two major housing needs of disabled persons. Physically disabled persons often require specially designed dwellings to permit access within the unit, as well as to and from a site. *California Administrative Code* Title 24 sets forth access and adaptability requirements for the physically handicapped (disabled). These regulations apply to all buildings such as motels, employee housing, factory-built housing, and privately funded, newly constructed apartment houses containing five or more dwelling units. The regulations also require that rampways, larger door widths, restroom modifications, etc. be designed to enable

free access by the handicapped. Such standards, however, are not mandatory for new single-family residential construction.

Table 2-45
Persons with Disabilities by Age and Type
Orange County

Disability by Age	Persons	%
Age 5 to 17 – total persons	703,641	
Hearing difficulty	3,884	0.6%
Vision difficulty	3,363	0.5%
Cognitive difficulty	14,903	2.9%
Ambulatory difficulty	2,811	0.5%
Self-care difficulty	5,770	1.1%
Age 18 to 64 – total persons	1,998,667	
Hearing difficulty	22,495	1.1%
Vision difficulty	20,555	1.0%
Cognitive difficulty	48,383	2.4%
Ambulatory difficulty	46,589	2.3%
Self-care difficulty	20,493	1.0%
Independent living difficulty	41,021	2.1%
Age 65 and over – total persons	448,781	
Hearing difficulty	53,881	12.0%
Vision difficulty	22,610	5.0%
Cognitive difficulty	37,661	8.4%
Ambulatory difficulty	83,960	18.7%
Self-care difficulty	38,172	8.5%
Independent living difficulty	64,465	14.4%

Source: American Community Survey 5-Year Estimates 2019

Table 2-46
Persons with Disabilities by Age and Type
Unincorporated CDPs

Disability by Age	Persons with a Disability	%
Age 5-17 – Total Persons	**20,123**	
Hearing difficulty	113	0.56%
Vision difficulty	54	0.27%
Cognitive difficulty	649	3.23%
Ambulatory difficulty	41	0.20%
Self-care difficulty	101	0.50%
Age 18 to 64 – Total Persons	**53,448**	
Hearing difficulty	656	1.23%
Vision difficulty	642	1.20%
Cognitive difficulty	1,171	2.19%
Ambulatory difficulty	1,242	2.32%
Self-care difficulty	427	0.80%
Independent living difficulty	944	1.77%
Age 65 and over – Total Persons	**13,228**	
Hearing difficulty	1,439	10.88%
Vision difficulty	632	4.78%
Cognitive difficulty	1,042	7.88%
Ambulatory difficulty	1,942	14.68%
Self-care difficulty	819	6.19%
Independent living difficulty	1,869	14.13%

Source: American Community Survey 5-Year Estimates 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Disabled persons have special needs regarding location. There is typically a desire to be located near public facilities, and near public transportation facilities that provide service to those who rely on them.

Table 2-45 shows disability data for all of Orange County and **Table 2-46** shows disability data for Unincorporated CDPs. The data shows that in the under 65 age groups disabilities are relatively rare – typically approximately 2% or less of the population for all of Orange County and are similar in Unincorporated CDPs, with the exception of cognitive difficulties for the age group 5-17 in Unincorporated CDPs. However, among seniors the incidence of disabilities increases significantly. Nearly 18.7% of persons in this age group reported an ambulatory difficulty in all of Orange County and nearly 15%, in Unincorporated areas while more than 14%

had an independent living difficulty in all of Orange County and in Unincorporated CDPs. Members of this age group are frequently on fixed incomes or rely on public assistance.

Developmentally Disabled

As defined by federal law, "developmental disability" means a severe, chronic disability of 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.
- 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.

The U.S. Census Bureau does not record developmental disabilities. According to the U.S. Administration on Intellectual Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as having a developmental-disability is 1.5 percent. Many persons with intellectual and development disabilities can live and work independently within a conventional housing environment. Individuals with more severe disabilities 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 intellectual and developmental disabilities exist before adulthood, the first issue in supportive housing for the individuals with intellectual and developmental disabilities is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The State of California Department of Developmental Services (DDS) provided 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, for fiscal year 2017 to 2018. The Regional Center of Orange County (RCOC) is one of 21 regional centers in the State of California that serves as a point of entry to services for people with developmental disabilities. The RCOC is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families. The goal of the RCOC is to help

Orange County residents with developmental disabilities and their families obtain local services and support to help them live safely and with dignity in the community.

Any resident of Orange County who has a developmental disability that originated before 18 years of age is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans (IPP) and may include: adult day programs; advocacy; assessment/consultation; behavior management programs; diagnosis and evaluation; independent living services; infant development programs; information and referrals; mobility training; prenatal diagnosis; residential care; respite care; physical and occupational therapy; transportation; consumer, family vendor training; and vocational training. The RCOC also coordinates the State-mandated Early Start program, which provides services for children under age three who have or are at substantial risk of having a developmental disability. According to the RCOC Facts and Statistics data, the RCOC currently serves over 22,000 individuals in Orange County with developmental disabilities and their families.

Based in Orange County, the Dayle McIntosh Center for the Disabled, also referred to as DMC, is a non-profit organization that provides services to people with disabilities and facilitates equal access and inclusion within the community. The mission of the DMC (http://www.daylemc.org) is to advance the empowerment, equality, integration, and full participation of people with disabilities in the community. The DMC is a non-residential program, but instead promotes the full integration of persons with disabilities into the community, regardless of the disability, and aims to meet the standards and indicators established for operation of independent living centers in the federal Rehabilitation Act of 1973, as amended. The DMC is a peer-based organization meaning that most of the staff is composed of individuals who have disabilities themselves and have met the challenge of becoming self-sufficient. Its staff and board are composed of over 50% of people with disabilities. Its two offices, located in Anaheim and Laguna Hills, serve over 500,000 people with disabilities in Orange County and surrounding areas. The County housing programs and regulations facilitate the provision of special needs housing such as emergency shelters and transitional housing, permanent supportive housing, assisted living and group homes to serve the needs of persons with developmental disabilities.

Homelessness

Throughout the country, homelessness is a serious problem. Factors contributing to homelessness include: the general shortage of housing affordable to extremely low- to moderate-income households; increases in the number of persons whose incomes fall below the poverty level; reductions in public subsidies and benefits; de-institutionalization of the mentally ill; criminal justice system reforms at the federal and state level; and most recently the impacts of the COVID-19 pandemic.

Profiles of the Homeless Population in Orange County

The Orange County Health Care Agency (HCA) serves as the administrative entity for the Orange County Continuum of Care. As such, HCA undertakes a bi-annual "Point-in-Time" (PIT) count of the unsheltered homeless population in Orange County and an annual count of the sheltered population as part of its application for homeless assistance grant funds to U.S. Department of Housing and Urban Development (HUD) and State of California grant funds. The most recent PIT survey for which results are available was conducted in January 2019[6]. That survey estimated that there were approximately 6,860 persons experiencing homelessness in Orange County at the time of the survey[7]. Of those, the survey estimated that 42% of persons experiencing homelessness were sheltered and 58% were unsheltered. The 2019 PIT survey results indicated an increase in the homeless population compared to the findings of the 2017 PIT Count. However, it is important to note that the 2019 PIT Count incorporated a change in methodology that allowed the unsheltered count to take place over two days to ensure the county was canvassed effectively and collected unique identifying data points to de-duplicate records. Additionally, the 2019 PIT Count incorporated the use of ESRI Survey123 mapping technology, a smartphone application that mapped the locations and city of origin where individuals experiencing homelessness were surveyed and which helped to facilitate survey data collection. The ESRI Survey123 application incorporated questions that collected demographic, subpopulation, and homelessness-related data as required by HUD.

By the very nature of homelessness, it is difficult to determine the location of homeless persons over an extended period of time. However, the incorporation of new technologies allowed for the 2019 PIT survey to enumerate persons experiencing unsheltered homelessness by jurisdiction, where traditionally this had only been captured for individual those in emergency shelters and transitional housing. The County released the results of the 2019 PIT Count broken down by household type, subpopulations, and jurisdictions. Using data from the 2019 PIT County, the County has estimated there were approximately 43 individuals experiencing homelessness in the Unincorporated areas, located in shelter programs and on the streets and in places not meant for human habitation. This represents less than one percent of the homeless population as counted during the 2019 PIT. Although this method probably understates the number of persons experiencing homelessness in the Unincorporated areas, since some service providers did not provide exact addresses to safeguard and protect the privacy of their clients, it is a methodology that has been used in previous County Housing Elements certified by HCD. This estimate of 53 persons is used for purposes of 2017 Senate Bill 2 (SB 2) analysis. Regardless of what methodology is used for estimating the location of the persons experiencing homelessness, this is a regional issue, and the County will continue to address it from a regional perspective.

[6] OC Health Care Agency received a waiver from HUD to forgo the 2021 unsheltered count due to the COVID-19 pandemic in an effort to safeguard the health of those most vulnerable and limit the spread of COVID-19 illness.
[7] 2019 Orange County Homeless Census & Survey, for OC Partnership by Focus Strategies

County Efforts to Address Homelessness

Senate Bill 2 (SB2) of 2007 requires that jurisdictions quantify the need for emergency shelter and determine whether existing facilities are adequate to serve the need of the homeless population. Under SB2, an emergency shelter is defined as "housing with minimal supportive services for persons experiencing homelessness that is limited to occupancy of six months or less by a person experiencing homelessness. On September 28, 2022, Governor Gavin Newsom approved California Assembly Bill 2339 (AB 2339), which amends the provisions of Government Code 65583 concerning emergency shelters. AB 2339 expanded the definition of emergency shelter to include "other interim interventions, including, but not limited to, a navigation center, bridge housing, and respite or recuperative care." The new requirements of AB 2339 apply to housing elements due to be revised pursuant to Section 65588 on or after January 1, 2021, thus, this Housing Element must comply with the new provisions. Under the revisions to Government Code section 65583(a)(4)(A), the County must identify "one or more zoning designations that allow residential uses, including mixed uses, where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit and that are suitable for residential uses." The County must identify zoning designations that have sufficient sites to meet the need for emergency shelter for the Unincorporated areas, which as identified above in the PIT survey, would need to accommodate 43 homeless persons.

Under Government Code Section 65583(a)(4)(F), as amended by AB 2339, "[a] local government can demonstrate, to the satisfaction of the department, the existence of one or more emergency shelters either within its jurisdiction or pursuant to a multijurisdictional agreement that can accommodate that jurisdiction's need and the needs of the other jurisdictions that are a part of the agreement for emergency shelter identified in paragraph (7) may comply with the zoning requirements of subparagraph (A) by identifying a zoning designation where new emergency shelters are allowed with a conditional use permit."

The County of Orange can accommodate the needs of homeless in the Unincorporated areas through the existence of the multijurisdictional shelters of Bridges at Kramer Place and the Yale Navigation Center. Moreover, the County's existing Zoning Code complies with the requirements of AB 2339, Government Code Section 65583(a)(4)(A), through compliance with subparagraph (a)(4)(F), by allowing emergency shelters and residential uses in industrial and commercial zones subject to a site development permit and objective site development standards. OCCO § 7-9-44, *et seq.*

The County's Zoning Code allows emergency shelters by-right in the Housing Opportunities Overlay Zone, made up of commercial and industrial zoning districts that allow residential uses. Transitional housing and permanent supportive housing are permitted as residential uses subject to the same standards as apply to other residential uses of the same type in the same zoning district in compliance with Government Code section 65583.

Since 1998, the County of Orange (County) has had a comprehensive, coordinated, and regional strategy to address homelessness. This strategy has included the Orange County Continuum of Care (CoC) that includes participation of all 34 cities in Orange County, County Departments, 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 other stakeholders to identify the gaps and unmet needs of the persons experiencing homelessness in Orange County.

In May 2016, the County established the Office of Care Coordination located in the County Executive Office. The Office of Care Coordination engages across Orange County, working with cities and community-based organizations to strengthen regional capacity and multi-city, multi-sector investments to prevent and address homelessness, coordinate public and private resources to meet the needs of the homeless population in Orange County and promote integration of services throughout the community that improve the countywide response to homelessness.

In October 2016, the Office of Care Coordination produced an Assessment of Homeless Services in Orange County. The assessment outlines eight key findings, 26 recommendations in five focused areas and next steps for Orange County to improve the existing homeless service system and promote successful outcomes for people experiencing homelessness. For the following two years, the Office of Care Coordination made significant progress in the implementation of the recommendations and started to focus on understanding the intersectionality between homelessness and the various components of the System of Care.

In April 2018, the Office of Care Coordination presented an update on the Assessment of Homeless Services in Orange County and Building the County's System of Care that is integrated and regional to meet the unique needs of the people experiencing homelessness in our community. The County's System of Care focused on expanding capacity and developing new services and programming that better met the needs of people at risk of homelessness and experiencing homelessness. This included the implementation of the Restaurant Meals program, the Whole Person Care pilot program to expand housing navigation, disability benefit assistance through SOAR, and much more.

Additionally, the Assessment of Homeless Services provided the framework and infrastructure that the County has continued to build upon to ensure that all components of the System of Care are available and well-coordinated. The five components of the System of Care are Behavioral Health, Healthcare, Community Corrections, Housing, and Benefits and Support Services, which involve several County Departments in the ongoing response to homelessness.

The Office of Care Coordination staffs and facilitates the Commission to End Homelessness established in 2018. The Commission works in collaboration with the County government, 34 city governments, business sector, philanthropic organizations, community organizations, faith-based organizations, health care, public safety, and other interested stakeholders to promote an effective response to homelessness within Orange County. The Director of Care Coordination

works with commission members to focus on regional policy and implementation strategies, affordable housing development, data and gaps analysis, best practice research, social policy, and systemic change.

In October 2022, the Commission to End Homelessness presented the Homeless Service System Pillars Report to the Board of Supervisors. The Homeless Service System Pillars Report resulted from an analysis of the Homeless Service System through a four-pillar framework: Prevention, Outreach and Supportive Services, Shelter, and Housing. The Homeless Service System Pillars Report yielded a definition, set of goals, best practices and guiding principles for each pillar and will help ensure that best practices, guiding principles and commitments are incorporated into both the Office of Care Coordination and County department's programming to align and establish consistent service delivery across the County.

The Office of Care Coordination also serves as the Collaborative Applicant and Administrative Entity of the Orange County CoC. The Orange County CoC has a 19-member Board that supports the local planning to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness. has a number of committees aimed at coordinating and collaborating on specific functions and programs associated with the Continuum of Care Program. The committees contribute to the ongoing planning, coordination, and collaboration of homeless services and programs to address the needs of individuals and families experiencing homelessness and preventing homelessness.

- The **Policies, Procedures and Standards Committee**[8] was created to continuously review and advise the CoC Board on items related to the governing and committee structures, operational guidelines, decision-making protocols, appointment processes and other matters related to policies, procedures and standards related to the conduct and operation of the Orange County CoC and the CoC Board. This includes designating and assigning tasks to workgroups and ad hoc groups to improve project performance, assessments, and policies.
- The **CES Steering Committee**[9] was created to continuously review and advise the CoC Board and Policies, Procedures and Standards (PPS) Committee on items related to the policies, procedures, and operation of the CES in Orange County. The CES Committee will support the CoC Board with policy development,

[8] Policies, Procedures and Standards Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Policies%20Procedures%20and%20Standards%20Charter.pdf
[9] Coordinated Entry System Steering Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Coordinated%20Entry%20System%20Steering%20Committee%20Charter.pdf

supporting strategic implementation of the CES and evaluating the efficiency and effectiveness of CES.

- The **Housing Opportunities Committee**[10] is to identify, coordinate and evaluate housing opportunities for people experiencing homelessness in the Orange County CoC. The Housing Opportunities Committee fulfills this goal by coordinating information and resources amongst regional housing providers, identifying gaps in affordable and permanent supportive housing, and supporting the creation of more housing opportunities in coordination with affordable housing developers, homeless service providers, cities, and Public Housing Authorities. The mission of the Housing Opportunities Committee is to provide more housing opportunities for people experiencing homelessness in Orange County.
- The **Orange County Service Provider Forum**[11] was created to convene the CoC General Membership semiannually, recruit additional members for the Orange County CoC and promote information and resource sharing for service providers and community partners working on the frontlines of the homeless response system.
- The **Transitional Aged Youth Collaborative Committee**[12] was created to coordinate services, enhance collaboration, and recommend best practices for TAY experiencing homelessness in Orange County. This includes recommending policies, procedures and sharing input on improving the quality and types of services provided to the Orange County CoC Board.
- The **Veterans Committee**[13] was created to ensuring that the CoC is actively working to prevent, reduce, and end homelessness for veterans, and measuring progress on these efforts. The Veterans Committee aligns with the intent of ensuring that the CoC is actively working to prevent, reduce, and end homelessness for veterans, and measuring progress on these efforts. The Veterans Committee will provide leadership on the issue of veteran homelessness and

[10] Housing Opportunities Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Housing%20Opportunities%20Charter.pdf
[11] Service Provider Forum Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Service%20Provider%20Forum%20Governance%20Charter.pdf
[12] Transitional Aged Youth Collaborative Committee - https://ceo.ocgov.com/sites/ceo/files/2023-02/TAY%20Collaborative%20Charter.pdf
[13] Veterans Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Veterans%20Committee%20Governance%20Charter.pdf

coordinate efforts to better serve veterans and their families in becoming permanently housed and achieving housing stability.

The County serves as the Coordinated Entry System (CES[14]) Lead for the Orange County CoC and is responsible for the implementation of a CES that address the needs of persons experiencing homelessness in Orange County, including adult only households, families with minor children, veterans, and Transitional Aged Youth. The primary goal of CES is to facilitate a participant-centered process that streamlines access to the most appropriate services and housing interventions for individuals experiencing homelessness or at risk of experiencing homelessness in Orange County. The CES aims to meet individualized preferences and needs with the goal of supporting participants return to stable housing. Persons experiencing homelessness and at risk of experiencing homelessness gain access to housing and supportive services more seamlessly through regionally coordinated access. The County has widely adopted the utilization of the CES to prioritize emergency shelter, interim housing, permanent housing, and supportive services.

Homeless needs and priorities continue to be identified through the Orange County CoC system. All CoC committees are public and inclusive of the participation of all stakeholders including homeless and formerly homeless individuals. In addition, the CoC consults with and engages homeless individuals to participate in the Point-in-Time Count and Survey of the homeless and the various committees and subcommittees of the CoC to address the emergency shelter and transitional housing needs of homeless persons. Most recently, the Orange County CoC established a Lived Experience Advisory Committee to ensure that the voices and perspectives of individuals with current and/or past lived experience of homelessness are heard and considered in the decision-making process of the CoC Board and provide a way to share recommendations and feedback on the CoC's programs and services. The CoC aims to build a diverse and inclusive Committees and as such is currently actively recruiting members for the various Committee.

The Homeless System of Care is established to create and provide services to those experiencing homelessness by working collaboratively with a variety of supportive services that can address the current needs and barriers with a goal of self-sufficiency and a permanent home. The system also aims to prevent recurring episodes of homelessness by ensuring individuals are connected to wrap around services and community services. In Orange County, a variety of private, federal, state, and county-funded programs offer job training courses, childcare, work appropriate clothing, food donations and/or meals, among other services. Many of these services are aimed to follow clients. The County of Orange continues to work on addressing and reducing homelessness countywide. Part of the implementation of programs established to serve the population is setting goals and meeting milestones to track progress. As such, the County of

[14] Coordinated Entry System - https://ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system

Orange in partnership with the Orange County CoC have developed a Local Homelessness Action Plan[15], which includes:

- Landscape Analysis of Needs
- Demographics, and Funding
- Analysis of People Being Served by the Homeless Service System
- Outcome Goals and Strategies to meet Outcome Goals
    - Reducing the number of persons experiencing homelessness.
    - Reducing the number of persons experiencing homelessness on a daily basis.
    - Reducing the number of persons who became newly homeless.
    - Increasing the number of people exiting homelessness into permanent housing.
    - Reducing the length of time persons remain homeless. Reducing the number of persons who return to homelessness within two years after exiting homelessness to permanent housing.
    - Increasing successful placements from street outreach.
- Funding Plans and Priorities that support the outcome goals and address needs and gaps within the homeless response system

Emergency Shelters, Transitional Housing, and Supportive Housing

Emergency shelters are facilities that provide a safe alternative to the streets either in a shelter facility, or through the use of motel vouchers. Emergency shelter stays are short-term, usually for six months or less. Transitional housing is longer-term emergency housing, typically six months up to two years with the goal of participants transitioning to permanent housing upon program exit. Transitional housing requires that the resident participate in a structured program to work toward the established goals so that they can move on to permanent housing. Participants are often provided with an array of supportive services to assist them in meeting goals. Supportive Housing is longer term permanent housing that provides supportive services to ensure housing stability for participants.

It should be recognized that most of the homeless population (as well as the services needed by these individuals) are found in the urbanized core of the county, most of which is within incorporated cities. This pattern continues as Unincorporated land is annexed or incorporated

[15] Local Homeless Action Plan as submitted in HHAP Round 4 application - https://bcsh.ca.gov/calich/documents/hhap_round4/counties/orange.pdf

into new cities. Therefore, it is appropriate that most of the facilities for this population are also located in the cities. As with other categories of housing assistance, OC Community Resources takes a broad perspective that includes more than just the Unincorporated areas, and many housing programs and affordable housing developments located in cities have been assisted by the County in recent years (see **Table A-2** in Appendix A).

SB 2 (2007) strengthened the planning requirements for emergency shelters and transitional/supportive housing. The bill requires jurisdictions to evaluate their needs for shelters compared to available facilities to address the need. Jurisdictions must also designate at least one location where a year-round shelter can be accommodated. It is estimated that the need for emergency shelter beds in the Unincorporated areas is for approximately 53 persons (see discussion in Section 2 – Community Profile and Needs). In order to encourage and facilitate the establishment of additional facilities, the Zoning Code amendment to allow shelters by-right in the commercial and industrial portions of the Housing Opportunities Overlay Zone was adopted by the Board of Supervisors in 2013.

There are approximately 153 acres of commercial and industrial zones eligible for by-right emergency shelter development under the Housing Opportunities Overlay Zone. According to the OC Housing Opportunities Manual, an emergency shelter or multi-service center shall comply with the site development standards of the base district. In the event of a conflict between the base district regulations and these standards, the provisions of section 7-9-44 shall control. The following lists standards and requirements for emergency shelters:

- A Management and Operations Plan shall be submitted for review and approval prior to operation of the emergency shelter or multi-service center.
- The Management and Operations Plan shall be in compliance with the provisions of the Orange County Housing Opportunities Manual.
- No facility shall be permitted less than 300 feet from another emergency shelter or multi-service center, measured from the nearest property lines.
- Emergency shelters may have a maximum of fifty (50) beds. Larger emergency shelters, up to a maximum of 150 beds, may be permitted subject to approval of a Use Permit per section 7-9-125.
- Off-street parking shall be provided at a rate of one (1) space per four (4) beds, plus one (1) space for each staff person (paid or volunteer) on duty.
- Bike racks shall be provided on site for use by staff and clients.
- An emergency shelter or multi-service center shall be open 24 hours a day unless an exemption is granted.
- Maximum consecutive length of stay shall be 180 days.

Low Barrier Navigation Centers

California Assembly Bill 101 (AB 101) states that "The Legislature finds and declares that Low Barrier Navigation Center developments are essential tools for alleviating the homelessness crisis in this state and are a matter of statewide concern-." 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 multifamily uses if it meets specified requirements. On September 27, 2022, the Orange County Zoning Code was amended to comply with State regulations on Low Barrier Navigation Centers (AB 101) to ensure Low Barrier Navigation Centers are allowed by-right in all zones that permit mixed-uses and non-residential uses. The existing Bridges at Kraemer Place and Yale Navigation Center both meet the criteria of Low Barrier Navigation Centers, as described above.

Inventory of Homeless Facilities

The facility and service need of families and individuals experiencing homelessness generally include emergency shelter, transitional housing, permanent supportive housing, and supportive services such as job training and counseling, behavioral and general health services.

Emergency shelters often provide accommodation for a few days up to six months. Transitional housing provides shelter for an extended period of time (as long as 24 months) and generally includes integration with other social services and counseling programs that assist people in increasing their income and securing long-term housing. Permanent supportive housing is rental housing for low-income or people experiencing homelessness in addition to a long-term disabling condition such as severe mental illness, substance abuse disorder, or HIV/AIDS with accompanying supportive services that also further self-sufficiency and housing stability. In Orange County, permanent supportive housing is prioritized for individuals who are experiencing chronic homelessness, which is defined as being homeless for a year or longer continuously, or on three separate occasions totaling 12 months, and having a long-term disabling condition.

The landscape of homeless services has changed significantly in Orange County since 2016, as the County and City jurisdictions have made significant investments in the development of emergency shelter, affordable housing, and permanent supportive housing programs to address the needs of individuals and families experiencing homelessness. As of January 2021, a network of nonprofit organizations and local governments operates 59 emergency shelter programs (including those operating in response to COVID-19), 42 transitional housing programs, and 31 permanent supportive housing programs within Orange County. Specifically, the County, individual jurisdictions, and numerous agencies oversee a total of 2,857 beds in emergency

shelters (**Table 2-47**), 899 beds in transitional housing shelters (**Table 2-48**) and 2,602 beds in permanent supportive housing settings (**Table 2-49**). Currently, 646 permanent supportive housing and affordable housing units are under development.

Unlike cities, the County plays a regional role in providing services to persons and families experiencing homelessness. The County-contracted facilities, such Bridges at Kraemer Place and the Yale Navigation Center that provides emergency shelter for adults experiencing homelessness, is located outside of the County's jurisdictional boundary but serves individuals from throughout the County, including the Unincorporated areas. In addition, the Orange County Office of Care Coordination coordinates the grant application process through which local homeless service providers receive over $23 million in federal funding annually for the Continuum of Care Program. The Orange County Office of Care Coordination also serves as the administrative entity for the Orange County Continuum of Care for State funding to address homelessness.

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children
1736 Family Crisis Center	SSVF EHA	C	NA	0	0	0
American Family Housing	Stanton Inn	C	NA	0	70	0
American Family Housing	Tahiti Motel Operations	U	NA	0	58	0
American Family Housing	Washington House	C	NA	0	16	0
Build Futures	Emergency Housing for Youth	C	NA	0	0	0
Casa Teresa	Emergency Maternity Shelter	C	NA	6	11	0
Casa Youth Shelter	Basic Center Group	C	NA	0	0	12
City Net	Santa Ana Armory	C	NA	0	0	0
CoC FEMA	CoC-Funded FEMA COVID-19	C	NA	0	0	0
Colette's Children's Home	Placentia Hope Emergency Shelter	C	NA	12	0	0
Family Assistance Ministries	Family House	C	NA	32	0	0
Family Assistance Ministries	Gilchrist House – Families	C	NA	9	0	0
Family Assistance Ministries	Project Room Key	C	NA	0	0	0
Friendship Shelter	Alternate Sleeping Location	C	NA	0	30	0
Friendship Shelter	Alternative Sleeping Location Drop-Offs	C	NA	0	0	0
Friendship Shelter	Bridge Housing Program	C	NA	0	28	0
Friendship Shelter	Safe Spaces	C	NA	0	2	0
Grandma's House of Hope	Bridge Re-Entry	C	NA	0	12	0
Grandma's House of Hope	Emergency Shelter CESH	C	NA	0	13	0
Grandma's House of Hope	Women's Emergency Shelter	C	NA	0	25	0
Human Options	Family Healing Center	C	DV	16	0	0
Human Options	Human Options Emergency Shelter	C	DV	29	0	0
Illumination Foundation	Fullerton Navigation Center	U	NA	0	90	0

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children
Illumination Foundation	Gilbert House	C	NA	15	0	0
Illumination Foundation	La Mesa Emergency Shelter	C	NA	12	90	0
Illumination Foundation	Murphy House	C	NA	28	0	0
Illumination Foundation	Recuperative Care Program - Broadway	U	NA	0	62	0
Illumination Foundation	Recuperative Care Program - MIDWAY	C	NA	0	30	0
Illumination Foundation	Temporary Isolation Shelter - Orange/Anaheim	C	NA	0	0	0
Illumination Foundation	The Link	C	NA	40	160	0
Illumination Foundation	Theriault House	C	NA	36	0	0
Interval House	Emergency Shelter	C	DV	68	3	0
Jamboree	Anaheim House	C	NA	0	6	0
Laura's House	Laura's Domestic Violence Emergency	C	DV	18	2	0
Mercy House	Bridges at Kramer Place	C	NA	0	142	0
Mercy House	Buena Park Emergency Shelter	C	NA	0	103	0
Mercy House	Costa Mesa Bridge Shelter	C	NA	0	29	0
Mercy House	Family Care Center	C	NA	36	0	0
Mercy House	FEMA - Costa Mesa	C	NA	0	0	0
Mercy House	FEMA - Santa Ana	C	NA	0	0	0
Mercy House	Huntington Beach Navigation Center	C	NA	0	124	0
Orange County Rescue Mission	ES Village of Hope	C	NA	33	33	0
Orange County Rescue Mission	Tustin Temporary Emergency Shelter	C	NA	9	48	0
PATH	Placentia Navigation Center	C	NA	0	100	0
PATH	Yale Navigation Center	U	NA	0	425	0
Pathways of Hope	New Vista Emergency	C	NA	44	0	0
Pathways of Hope	Via Esperanza	C	NA	45	0	0
Precious Life Shelter	Emergency Shelter	C	NA	0	6	0
Radiant Health Centers	Short Term Supportive Housing	C	HIV	0	0	0
Salvation Army	Anaheim Emergency Shelter	C	NA	0	325	0
Salvation Army	Salvation Army - FEMA Project	C	NA	0	28	0
The Eli Home	The Eli Home CARP Residential Recovery Shelter Program	C	DV	18	0	0
The Midnight Mission	Courtyard in OC	C	NA	0	238	0
US Veterans Initiatives	SSVF EHA	C	NA	0	0	0
Volunteers of America	SSVF EHA	C	NA	0	0	0
Waymakers	Huntington Beach Youth Shelter	C	NA	0	0	4
WISEPlace	Safe Place	C	NA	0	30	0
Women's Transitional Living Center	45 Day Emergency Shelter	C	DV	37	0	0
Women's Transitional Living Center	Safety Net	C	DV	3	3	0

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

Table 2-48
Transitional Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds
Build Futures	Emergency Housing for Youth	C	NA	0	0	0	0
Casa Teresa	Casa Teresa Parenting Program	C	NA	0	14	0	14
Casa Teresa	Casa Teresa Transformation I Program	C	NA	4	0	0	4
Casa Teresa	Casa Teresa Transformation II Program	C	NA	5	0	0	5
Colette's Children's Home	CCH Ariel Place/Anaheim	C	NA	9	0	0	9
Colette's Children's Home	CCH Cypress Street #2/Placentia	C	NA	8	2	0	10
Colette's Children's Home	Colette's Children's Home #1	C	NA	12	2	0	14
Colette's Children's Home	Colette's Children's Home #2	C	NA	12	1	0	13
Colette's Children's Home	Colette's Children's Home #3	C	NA	9	0	0	9
Colette's Children's Home	Cypress/Placentia III	C	NA	9	0	0	9
Colette's Children's Home	Dairyview	C	NA	12	2	0	14
Families Forward	I-Transitional Housing - Irvine	C	NA	4	0	0	4
Families Forward	I-Transitional Housing- Lake Forest	C	NA	12	0	0	12
Family Assistance Ministries	Gilchrist House - Individuals	C	NA	0	8	0	8
Grandma's House of Hope	GHH Men's Recovery Residence	C	NA	0	13	0	13
Grandma's House of Hope	GHH Men's Transitional Short Term Housing	C	NA	0	6	0	6
Grandma's House of Hope	Healing House	C	NA	0	12	0	12
Grandma's House of Hope	Men's Bridge	C	NA	0	10	0	10
Grandma's House of Hope	VOCA XH	C	NA	0	11	0	11
Grandma's House of Hope	Women's Bridge	C	NA	0	20	0	20
HIS House	CHESS - TAY	C	NA	0	14	0	14
HIS House	HIS House Transitional	C	NA	48	0	0	48
Human Options	Second Step	C	DV	48	0	0	48
Laura's House	Laura's Domestic Violence Transitional Housing Program	C	DV	7	0	0	8
Mary's Shelter	Transitional Living for Homeless Youth	C	NA	0		30	30
OC Gateway to Housing	Transitional Housing Program - Tustin	C	NA	28	0	0	28
OC Gateway to Housing	Transitional Housing Program- Santa Ana	C	NA	8	0	0	8
One Step Ministry	Our House	C	NA	9	0	0	9

Table 2-48
Transitional Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds
Orange County Rescue Mission	Hope Family Housing-Buena Park	C	NA	65	0	0	65
Orange County Rescue Mission	House of Hope	C	NA	45	0	0	45
Orange County Rescue Mission	TH Village of Hope	C	NA	98	98	0	196
Orange County Rescue Mission	Tustin Veteran's Outpost	C	NA	16	10	0	26
Precious Life Shelter	Transitional Program	C	NA	25	0	0	25
Salvation Army	Transitional Housing - Buena Park	C	NA	6	0	0	6
Salvation Army	Transitional Housing - Tustin	C	NA	9	0	0	9
South County Outreach	SCO Transitional Housing - Laguna Niguel	C	NA	3	0	0	3
South County Outreach	SCO Transitional Housing - Lake Forest	C	NA	21	0	0	21
South County Outreach	SCO Transitional Housing - Mission Viejo	C	NA	6	0	0	6
Thomas House	2nd Step	C	NA	12	0	0	12
Thomas House	Thomas House Homeless Family Shelter #10	C	NA	64	0	0	64
WISEPlace	Positive Steps House	C	NA	0	5	0	5
WISEPlace	Steps to Independence	C	NA	0	19	0	19
Women's Transitional Living Center	Transitional Housing	C	DV	7	0	0	7

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children
YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

Table 2-49
Permanent Supportive Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds	PIT Count	Total Beds
American Family Housing	Permanent Housing 2	C	NA	31	7	0	38	39	38
American Family Housing	Permanent Housing Collaborative	C	NA	36	8	0	44	40	44
Anaheim Supportive Housing	Tyrol Plaza	C	NA	0	12	0	12	12	12
Friendship Shelter	Henderson House Permanent Supportive Housing	C	NA	0	35	0	35	34	35
Illumination Foundation	SHP Stanton Multi-Service Center	C	NA	8	22	0	30	34	30
Illumination Foundation	Street 2 Home	C	NA	49	96	0	145	142	145
Jamboree	Diamond Apartments	C	NA	27	15	0	42	33	42
Jamboree	Doria Apartment Homes	C	NA	6	18	0	24	23	24

Table 2-49
Permanent Supportive Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds	PIT Count	Total Beds
Jamboree	Heroes Landing	C	NA	15	70		85	86	85
Mercy House	AFH PSH Collaboration II	C	NA	0	7	0	7	7	7
Mercy House	CCH PSH Collaboration II	C	NA	0	1	0	1	1	1
Mercy House	CCH PSH Collaborative	C	NA	0	1	0	1	1	1
Mercy House	CoC Leasing	C	NA	9	13	0	22	26	22
Mercy House	FAM PSH Collaboration II	C	NA	0	12	0	12	12	12
Mercy House	FSI PSH Collaboration	C	NA	0	39	0	39	38	39
Mercy House	FSI PSH Collaboration II	C	NA	0	17	0	17	17	17
Mercy House	MCY PSH Collaboration II	C	NA	12	16	0	28	27	28
Mercy House	MCY PSH Collaborative	C	NA	12	106	0	118	140	118
Mercy House	Mills End and PSH Leasing Consolidation	C	NA	2	19	0	21	23	21
Mercy House	POH PSH Collaboration II	C	NA	0	20	0	20	20	20
Mercy House	The Aqua	C	NA	0	56	0	56	2	56
Orange County Housing Authority	#1 Consolidated Shelter Plus Care TRA	C	NA	153	123	0	276	329	276
Orange County Housing Authority	#2 Consolidated CoC TRA	C	NA	69	54	0	123	120	123
Orange County Housing Authority	#3 Consolidated CoC TRA	C	NA	99	84	0	183	179	183
Orange County Housing Authority	#4 Consolidated CoC TRA	C	NA	91	61	0	152	132	152
Orange County Housing Authority	Jackson Aisle	C	NA	0	29	0	29	27	29
Orange County Housing Authority	Placentia Veterans Village	C	NA	12	45	0	57	47	57
Orange County Housing Authority	Potter's Lane PB VASH	C	NA	0	8	0	8	9	8
Orange County Housing Authority	Salerno VASH	U	NA	20	11	0	31	0	31
Orange County Housing Authority	VASH	C	NA	574	397	0	971	949	971
Orange County Housing Authority	VASH Project-Based Vouchers - Newport Veteran's Housing	C	NA	0	6	0	6	6	6

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children
YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

The County typically funds one seasonal emergency shelter which has historically been in a State National Guard armory in the Central Service Planning Area. This shelter has provided up to 200 emergency shelter beds each night during the winter months. Along with beds, these shelters provide shower facilities and meals to individuals and families experiencing homelessness.

Additionally, the County funds the operations of two year-round emergency shelter programs for individuals experiencing homelessness, Bridges at Kraemer Place, and the Yale Navigation Center. Bridges at Kraemer Place provides 200 beds of emergency shelter in the North Service Planning Area and the Yale Navigation Center provides 425 beds of emergency shelter in the Central Service Planning Area. Both programs have a large emphasis on housing-focused case management and supporting participants in accessing needed resources and supportive services to assist them in securing appropriate housing options. The County is committed to supporting cities that operate their own emergency shelters and promoting coordination to increase access to shelter beds amongst the unsheltered population. There is one year-round program located in the Unincorporated areas of the County. American Family Housing leases space to the Illumination Foundation for the provision of 18 transitional housing units in Midway City.

Farm Workers

As defined in the County of Orange Zoning Code, a farm worker is an employee engaged in agriculture, which includes farming in all its branches, including preparation for market and delivery to storage or to market or to carriers for transportation to market. Historically Orange County's economy was linked to agriculture. While there are still active farming areas on the Irvine Ranch, Rancho Mission Viejo, and in some cities, shifts in the local economy to production and service-oriented sectors have significantly curtailed agricultural production within the county. Today, Orange County is a mostly developed urban/suburban area, with a strong local economy. Although the county is increasingly capturing major employers in Southern California, this growth is not tied to an agricultural base.

Recent U.S. Census Bureau estimates reported about 169 persons employed in agricultural occupations in Unincorporated Orange County. This represents about 0.17% of all occupations in Unincorporated Orange County (**Table 2-50**).

Table 2-50
Agricultural Employment –
Unincorporated Orange County, Orange County, and SCAG Region

Employment By Occupation	Unincorporated Orange County	% of Unincorporated Orange County	Orange County	SCAG Region Total
Total Jobs: Farming, Fishing, and Forestry Occupations	109	0.17%	5,823	57,741
Full-Time, Year-Round Jobs: Farming, Fishing, and Forestry Occupations	60	0.14%	3,246	31,521
Total Jobs in Agriculture, Forestry, Fishing, and Hunting Industry	179	0.28%	7,744	73,778
Full-Time, Year-Round Jobs in Agriculture, Forestry, Fishing, and Hunting Industry	N/A	N/A	5,256	44,979

Source: SCAG Local Housing Pre-Certified Local Housing Data 2020, American Community Survey, 5-Year Estimates, 2018

The U.S. 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 per year, represent the largest category of workers with 1,106 workers (62%). A total of 666 workers (38%) are considered seasonal and work less than 150 days per year. Orange County reported 340 migrant workers (19%) with full time hired labor in 2017. In addition, the County reported 176 unpaid workers.

While there is still significant agricultural production on the Irvine Ranch and Rancho Mission Viejo, farmland has steadily decreased in recent decades and thus, the need for farm worker housing is not as great as it once was.

Consistent with California Health and Safety Code Sections 17021.5 and 17021.6, the County's Zoning Code provides that agricultural employee housing is permitted by-right, without a Use Permit (UP), in single-family zones for six or fewer persons and in agricultural zones with no more than 12 units or 36 beds. The Orange County Zoning Code currently permits farm worker housing in the A1 (General Agricultural) District with the approval of a Site Development Permit (SDP).

Analysis of Special Housing Needs and Housing Element Resources for Special Needs Groups

As the tables in the Special Housing Needs section above demonstrate, the Unincorporated areas of the County appear to be in need of extremely low, very low, and low-income housing. In addition, the data reveals that the Unincorporated County requires housing to address the special needs of the senior population over 65. In addition, a greater stock of housing that is larger than 4 bedroom, or more multifamily housing units, would alleviate some of the overcrowding and pricing concerns that are evident in some areas of the Unincorporated County. Due to the low populations of disabled persons under 65 and farmworkers, housing to address these special needs populations are lower priority.

Appendix A provides accomplishments relating to improving the housing needs of these special needs groups. The County continues to work with the community and housing developers to find solutions to create accessible new housing options and better understand the unique needs of community members. As such, the County has included the programs in the Housing Action Plan to provide for accessible housing.

3. CONSTRAINTS

Governmental Constraints

Land Use Plans and Regulations

General Plan

Each city and county in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of the General Plan establishes the basic land uses and density of development within the various areas of the County. Under state law, the General Plan elements must be internally consistent, and the County's zoning must be consistent with the General Plan. Thus, the land use plan must provide suitable locations and densities to implement the policies of the Housing Element. The Orange County General Plan Land Use Element provides for four residential land use designations, as shown in **Table 3-1**.

Table 3-1
Residential Land Use Categories –
Orange County General Plan Land Use Element

Designation	Maximum Density[1]	Description
Rural Residential (1A)	.025 – 0.5 du/ac	Limited residential use compatible with the natural character of the terrain.
Suburban (1B)	0.5 – 18 du/ac	Wide range of housing types, from estates on large lots to attached dwelling units (townhomes, condominiums, and clustered arrangements)
Urban Residential (1C)	18.0 and above du/ac	Applied to areas where intensive residential development is compatible with surrounding urban development. Characterized by intensive residential uses such as apartments, condominiums, townhomes, and clustered residential units.
Urban Activity Center (6)	18+[2]	Identifies locations intended for high-intensity mixed-use development. Intended to facilitate a more efficient use of transportation systems, conserve energy resources, and develop residential densities that enhance the ability to provide affordable housing.

Source: Orange County General Plan.
[1]Density expressed in dwelling units per net acre.
[2]Special development regulations apply to ensure that the ultimate development pattern is consistent with the intent of the category.

The Land Use Element of the Orange County General Plan designates approximately 72,382.63 gross acres (41%) of the Unincorporated County's total land inventory (excluding Cleveland National Forest) for residential uses, providing for a range of residential types and densities throughout the Unincorporated County.

The maximum gross residential density in the Suburban Residential (1B) land use category is 18 dwelling units per acre, excluding any allowable density bonus. Gross density typically includes

street rights-of-way, utility easements, local parks, and other community infrastructure. Net densities, including allowable density bonus, are based on net parcel size and therefore may be significantly higher. Maximum densities within the Urban Residential (1C) and Urban Activity Center (6) land use categories are regulated by the applicable zoning, as well as by infrastructure and environmental constraints. The County's approach to accommodating affordable housing has not solely been dependent on achieving high densities, but also on maintenance of a higher-than-average number of multifamily units as a proportion of total units, and upon successful leverage of state and federal subsidies for affordable housing. Residential developers have generally proposed projects that do not meet the maximum allowable density due to the economics of development. Development standards do not inhibit proposed projects from reaching the maximum density.

Pursuant to California Assembly Bill (AB 2348) (2004), the "default density" for most Orange County jurisdictions, including the Unincorporated County, is 30 dwelling units per acre[16]. The default density refers to the density at which lower-income housing development is presumed to be feasible, although state law allows jurisdictions to propose alternative densities that are sufficient to facilitate affordable housing based on local experience and circumstances.

The Orange County General Plan is not considered to be a constraint to the goals and policies of the Housing Element as the County's zoning is consistent with the General Plan and adequate sites with appropriate densities have been identified to permit the construction of the County's fair share of new housing units for the 2021-2029 planning period. Under the Housing Opportunities Overlay Regulations (section 7-9-44) adopted in 2020, affordable housing developments are permitted by-right at a density up to 43.5 units per acre, excluding density bonus.

To meet the requirement that the County complete any necessary rezoning to meet its RHNA by October 15, 2022, on September 27, 2022, the Board of Supervisors adopted an amendment to the Housing Opportunities Overlay Zone regulations to increase the base density to 70 units per acre, excluding any applicable density bonus.

Since the January 10, 2006 adoption of the Housing Opportunities Overlay Zone, eight (8) projects have been built (within the Housing Opportunities Overlay Zone) which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families. Those projects, with densities between 30 and 63.4 units per acre, include affordable units at the 30%, 50% and 60% AMI level and demonstrate that lower-income housing is feasible under current regulations (see further discussion in Appendix B, Land Inventory).

[16] Memo of June 9, 2005 from California Department of Housing and Community Development on AB 2348 of 2004.

Zoning Ordinance

Zoning regulations serve as a key General Plan implementation tool. The County's Zoning Code accommodates a diversity of residential housing types. As addressed in Section 2, the County has made efforts to remove as many constraints as possible from the Zoning regulations; however, existing regulations can pose a barrier to the existence of affordable housing. It allows for innovation in design standards within parameters designated on Land Use Element, Table III-1 provided the overall density and dwelling unit capacity is not exceeded. The Orange County Zoning Code provides for 17 residential zoning districts, as listed below:

- A1 "General Agricultural" District
- AR "Agricultural Residential" District
- E1 "Estates" District
- RHE "Residential Hillside Estates" District
- E4 "Small Estates" District
- H "Housing Opportunities" Overlay District
- MX "Mixed-Use" District
- RE "Residential Estates" District
- R1 "Single-Family Residence" District
- RS "Residential, Single-Family" District"
- R2 "Multifamily Dwelling" District
- R3 "Apartment" District
- R4 "Suburban Multifamily Residential" District
- PC "Planned Community" District
- PD "Planned Development" Combining District

Of the 17 residential use zoning districts (including A1 General Agricultural), multifamily projects of four units or less are permitted by-right in the R2, R3 and R4 zones, as well as in Planned Community Districts. Single-family dwellings are allowed in all residential zones in the County. Allowable densities in these zones range from 0.4 units/acre in the A1 zone up to 43 units/acre in the R2 and R3 zones. The height limit is 35 feet in all zones except R3, which allows up to 65 feet. Please see **Table 3-2** for a summary of the applicable development standards in these zoning districts. Notwithstanding the number of zoning districts identified, however, the overwhelming majority of development approved within the Unincorporated County was accomplished under the PC "Planned Community" District.

Planned Community District: One particularly effective component of the County's zoning regulations is the Planned Community (PC) designation. In general, each planned community is subject to the standard provisions of the Zoning Code. The purpose of this district is to provide the authority, regulations and procedures whereby large land areas can be planned, zoned, developed, and administered as individual, integrated communities. It is intended that each planned community will be developed to take maximum advantage of its location, environment, and physical features. Several of these planned communities are also the subject of development agreements, which identify the levels of development allowed and important public facilities that will accompany development.

Rancho Mission Viejo Planned Community: The most recently approved Planned Community is Rancho Mission Viejo (RMV), approved by the Board of Supervisors on November 8, 2004. Rancho Mission Viejo is located in southeastern Orange County east of San Juan Capistrano and north of San Clemente. Rancho Mission Viejo includes the development of 5,768 acres of the 22,683-acre Planned Community with a maximum of 14,000 dwelling units, 6,000 of which are forecasted to be age restricted, and 5.2 million sq. ft. of employment floor area. The remainder of Rancho Mission Viejo, 16,915 acres, is planned to remain as protected, permanent open space. Build-out of the planned community is expected in approximately 20 years.

As is the case with nearly all planned communities approved in Orange County, Rancho Mission Viejo is subject to a Development Agreement between the County and the landowner. The Ranch Plan Development Agreement requires that the developer offer for dedication an aggregate of 60 gross acres of land to the County, which would be graded and improved for the County's development of low-income rental housing. In July 2006 the County and property owner entered into an Affordable Housing Implementation Agreement (AHIA), or as may be supplemented, that delineates the process for transferring the property to the County for development. Development assumptions for Rancho Mission Viejo are discussed in greater detail in Appendix B – Land Inventory.

Since the grand opening of Planning Area 1 in 2013, Rancho Mission Viejo and neighborhood builders have completed and sold/rented 1,247 housing units in Sendero PA1, of which 286 are deed-restricted senior housing (Age Qualified) units. In addition, 107 senior affordable apartments have been leased. Since the grand opening of PA2 in 2015 and through the end of 2019, Rancho Mission Viejo and neighborhood builders have obtained building permits for 2,507 market rate units in Esencia PA2, and occupancy permits (closings) for 2,475 market rate units, of which 830 have been deed-restricted senior housing (Age Qualified) units. In addition, a 112-unit affordable family apartment project has been leased. Planning Area 3.2a was issued certificates of occupancy in January 2023 and includes 145 deed-restricted senior housing (Age Qualified) and 134 market-rate, for sale units. Planning Area 3.2b has been approved with six neighborhood builders for a total of 514 units.

Mixed-Use Overlay District: Another particularly effective component of the County's zoning regulations is mixed-use development, which is permitted in the MX district. In contrast to single-use zones, mixed-use combines residential with retail, office, commercial and/or entertainment developments. Mixed-use not only allows residents to live, work, and shop within walking distance, it strengthens the economy with an employee and retail base for local businesses. Mixed-use is especially beneficial for communities lacking vacant residential sites, creating the opportunity for new housing through infill development and decreasing housing costs through shared amenities and parking.

The County's MX "Mixed-Use" Overlay District provides the opportunity to develop high density housing in commercial areas and requires residential uses for fifty percent (50%) of the total floor area. These regulations are intended to facilitate the vertical and horizontal mixing of retail, office, and residential uses and development of mixed-use buildings accommodating both residential and employment activities. In both infill contexts and in larger projects, these regulations shall facilitate the inclusion of cultural, civic, education, and urban recreational uses and support transit-oriented development and alternative modes of transportation.

A summary of the development standards for the 17 zoning districts permitting residential development is provided in **Table 3-2**. These development standards are reasonably necessary to protect the public health, safety and welfare and maintain the quality of life, and are not considered to be constraints to the development of housing. For additional details, development standards for each zoning district are available on the County's website, per Government Code 65940.1(a)(1)(B).

Table 3-2
Summary of Residential Zoning Regulations
County of Orange (Unincorporated Areas)

Zoning Districts	Site Coverage	Min. Land Area per Unit/ Max. Density	Height Limit	From Ultimate Street R/W Line			From Property Line Not Abutting Street		On Panhandle Building Site from Any Property Line
				Front	Side	Rear	Side	Rear	
A1 "General Agricultural" District	NA	4 acres/ 1 du/ac	35 ft.	20	5	25	5	25[4]	10
AR "Agricultural Residential" District	35	7,200 sq.ft./ 6.1 du/ac	35 ft.	20	5	25	5	25[4]	10
E1 "Estates" District	35	1 acre/ 1.0 du/ac	35 ft.	45	20	50	20	50[4]	10
RHE "Residential Hillside Estates" District	35	10,000 sq.ft./ 4.4 du/ac	35 ft.	10	8	25	8	25[4]	10
E4 "Small Estates" District	35	10,000 sq.ft./ 4. 4-du/ac	35 ft.	30	note[1]	25	note[1]	25[4]	10
H "Housing Opportunities" Overlay District[5]	NA	Up to 70 du/ac	65 ft.	20	note[2]	25	note[2]	25[4]	10
MX "Mixed-Use" Overlay District[5]	NA	Up to 33 du/ac	note[5]	note[5]	note[5]	note[5]	note[5]	note[5]	note[5]
RE "Residential Estates" District	35	20,000 sq.ft./ 2.2 du/ac	35 ft.	40	note[1]	25	note[1]	25[4]	15
R1 "Single-Family Residence" District	NA	7,200 sq.ft./ 6.1 du/ac	35 ft.	20	5	25	5	25[4]	10
RS "Residential, Single-Family District"	35	7,000 sq.ft./ 6.2 du/ac	35 ft.	10	10	10	note[3]	0	10
R2 "Multifamily Dwelling" District	NA	1,000 sq.ft./ 43.5 du/ac	35 ft.	20	5	25	5	25[4]	10
R3 "Apartment" District	NA	1,000 sq.ft./ 43.5 du/ac	65 ft.	20	note[2]	25	note[2]	25[4]	10
R4 "Suburban Multifamily Residential" District	NA	3,000 sq.ft./ 14.5 du/ac	35 ft.	20	5	25	5	25[4]	10
PC "Planned Community" District	For each proposed Planned Community, a specific PC Program Text shall be adopted by ordinance that specifies land use regulations and procedures applicable to all areas within the boundaries of the planned community.								
PD "Planned Development" Combining District	In any district where the district symbol is followed by, as a part of such symbol, the letters "(PD)," planned development projects shall be permitted subject to the use regulations, development standards, and other provisions. Projects located within this district that are not a planned development, or not part of a planned development, shall comply with the regulations of the base district and are not subject to the provisions of this section.								

Notes:
[1]Ten (10) percent average ultimate net width of building site-Maximum twenty (20) feet.
[2]Five (5) feet; add one (1) foot for each additional story over two (2).
[3]Ten (10) feet on one side only or ten (10) feet total of two (2) sides combined.
[4]In computing the depth of a rear set back from any building where such setbacks open on an alley, private street, public park or public beach, one-half of the width of such alley, street, park or beach may be deemed to be a portion of the rear setback, except that under this provision, no rear setback shall be less than 50 feet.
[5]H "Housing Opportunities" Overlay District and MX "Mixed-Use" Overlay District: Sites shall comply with the base district site development standards.
Source: County of Orange Zoning Code, 2020

Off-Street Parking Requirements

Parking is a necessary aspect of any development and can constrain the development of affordable housing. For every parking space that is required, there is less land available for development. Excessive parking requirements can thus drive up the cost of development. Parking requirements in the County, however, are similar to other jurisdictions and are not considered to be so stringent as to be a constraint to housing development. In addition, the County has adopted less-restrictive parking requirements applicable to affordable and senior citizen housing to facilitate their development. Furthermore, the Zoning Code provides additional opportunities for all developments to request alternatives to off-street parking regulations (section 7-9-70.9). Residential parking requirements for the County are displayed in **Table 3-3**.

The County's Zoning Code assigns parking standards with the intent to promote efficient land use. It is intended that these regulations will result in properly designed parking facilities of sufficient capacity to minimize traffic congestion, enhance public safety, generally provide for the parking of motor vehicles at locations other than on the streets, and for safe passage of pedestrians to and from parked vehicles.

Table 3-3
Residential Parking Requirements
County of Orange (Unincorporated Areas)

Type of Residential Development	Required Off-Street Parking Spaces	Comments
Attached / Detached Single-Family Dwellings	(a) Two (2) covered parking spaces required for each dwelling. (b) In addition to parking required in (a) above, additional parking spaces shall be provided as follows: (1) Those dwellings having less than an eighteen (18)-foot setback from the right-of-way (driveway), whichever is closest to the garage or carport, shall provide one (1) additional off-street parking space within two hundred (200) feet of the dwelling subject to location requirements in (f) "Location of residential parking spaces," below. (2) Those dwelling units located within a planned development shall provide an additional one-half (0.5) guest parking space per unit subject to (f) "Location of residential parking spaces," below. (3) Those dwellings with more than four (4) bedrooms shall provide an additional one-half (0.5) off-street parking space on the same parcel for each additional bedroom. In addition to the two (2) required covered spaces. If one additional space is required, if shall be covered. If more than one additional space is required, at least fifty percent (50%) of the additional spaces shall be covered and may be tandem spaces. (c) Those dwellings on streets that do not allow on-street parking shall provide one (1) additional off-street parking space within two hundred (200) feet of the unit subject to "Location of residential parking spaces," below.	For purposes of this section, a room such as a den, study or sewing room shall be considered a bedroom. One-half (0.5) and greater parking spaces shall be rounded up, less than one-half (0.5) shall be rounded down. All parking spaces are subject to location requirements in below.
Multifamily Dwellings	(a) Zero to one-bedroom dwelling units: One and one-half (1.5) off-street parking spaces for each dwelling unit. Except as otherwise provided in d. below, one (1) space shall be covered for each dwelling unit. (b) Two-bedroom dwelling units: Two (2) off-street parking spaces for each dwelling unit. Except as otherwise provided in d. below, one (1) of the spaces shall be covered for each dwelling unit. (c) Three or more-bedroom dwelling units: Two and one-half (2.5) off-street parking spaces for each dwelling unit, plus one-half (0.5) off-street parking space for each bedroom in excess of three (3). Except as otherwise provided in d. below, two (2) spaces shall be covered for each dwelling unit. (d) Notwithstanding the provisions of this subsection, the requirement that off-street parking spaces be covered is not applicable for multifamily projects of five (5) or more dwelling units. (e) Guest parking: In addition to the above, two-tenths (0.2) guest parking spaces per dwelling unit shall be provided.	For purposes of this section, a room such as a den, study or sewing room shall be considered a bedroom. One-half (0.5) and greater parking spaces shall be rounded up, less than one-half (0.5) shall be rounded down. All parking spaces are subject to location requirements below.
Affordable housing For projects where 100% of the units, excluding the Manager's Unit, are affordable to households earning 80% or less of the	**Minimum required parking spaces** **Unit Size (Square Feet)** / **Assigned** / **+** / **Unassigned** 700 or less / 1.0 / / - 701—800 / 1.0 / + / 0.17	

Table 3-3
Residential Parking Requirements
County of Orange (Unincorporated Areas)

Type of Residential Development	Required Off-Street Parking Spaces			Comments
Average Median Income (AMI) established by the California Department of Housing and Community Development (HCD) for the County of Orange	801—900	1.0	+	0.34
	901—1000	1.0	+	0.50
	1001—1100	1.0	+	0.67
	1101—1200	1.0	+	0.84
	1201—1300	1.0	+	1.00
	1301—1400	1.0	+	1.18
	1401—1500	1.0	+	1.34
	Over 1500	1.0	+	1.50
Senior housing (Also known as Senior Citizen Housing Development as defined by Civil Code 51.3 and 51.12, as may be amended.)	(a) Zero to one-bedroom dwelling units: One (1) off-street parking space (b) Two-bedroom to three-bedroom dwelling units: Two (2) off-street parking spaces (c) Four or more bedroom dwelling units: Two and one-half (2.5) off-street parking spaces for each dwelling unit (d) The number of required parking spaces shall be rounded up to the next whole number. (e) If there is any conflict between the senior housing parking requirements set forth in these zoning regulations and the senior housing parking requirements set forth in the State Density Bonus Law, the State Density Bonus Law parking requirements shall be used.			
Accessory dwelling units	One (1) additional parking space per accessory dwelling unit per the standards set forth in section 7-9-90 is required, except in the instances listed below. These spaces may be provided as tandem parking on an existing driveway. No additional parking space is required for an accessory dwelling unit in any of the following instances: (a) The accessory dwelling unit is located within one-half (0.5) mile of public transit. (b) The accessory dwelling unit is located within an architecturally and historically significant historic district. (c) The accessory dwelling unit is contained within the existing primary residence, an addition to the existing primary residence, newly built residence, or an existing accessory structure. (d) When on-street parking permits are required but not offered to the occupant of the accessory dwelling unit. (e) When there is a car share vehicle located within one block of the accessory dwelling unit. (f) If the accessory dwelling unit has no bedrooms (i.e. studio units).			
Location of residential parking spaces: 1) Required spaces including guest or unassigned spaces shall be off-street and located within two hundred (200) feet walking distance along a pedestrian path (i.e., sidewalk, crosswalk, etc.) of the dwelling unit they serve. 2) For "wrap-around" multifamily, multi-story residential developments, where the units surround an interior parking structure, the required spaces including guest or unassigned spaces shall be off-street and located within two hundred (200) feet of the elevator servicing the units. 3) Assigned spaces shall be designated as to the dwelling unit to which they are assigned on all plot plans submitted for permits.				
Source: County of Orange Zoning Code, 2020				

Special Needs Housing Constraints

Persons with special needs include those in residential care facilities, persons with disabilities, the elderly, farm workers, persons experiencing homelessness needing emergency shelter or transitional living arrangements, and single room occupancy units. In accordance with state law, the County does not require residential care facilities, community care facilities, alcoholism or drug abuse recovery treatment facilities, and congregate living health facilities, serving six or fewer residents to obtain any permits; such uses are not treated any differently from any other residential use of property. (See Health & Safety Code §§ 1267.16 [congregate living health

facilities], 1566.3 [community care and residential facilities], 1568.0831 [residential care facilities for persons with chronic life-threatening illness], 11834.23 [alcoholism or drug abuse recovery treatment facilities].). There are no constraints on housing for persons with disabilities for facilities serving six or fewer persons. State law allows, and the County requires, residential care facilities, community care facilities, alcoholism or drug abuse recovery treatment facilities, and congregate living health facilities, serving seven or more residents to obtain a Use Permit.

Housing for Persons with Disabilities

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

Reasonable Accommodation

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, and procedures, or 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 Code to ensure that homes are accessible for the mobility impaired. Whether a particular modification is reasonable depends on the circumstances.

To ensure maximum housing flexibility for persons with disabilities, the Orange County Zoning Code makes available reasonable accommodation for persons with disabilities based on the following factors:

- Whether the housing, which is the subject of the request for reasonable accommodation, will be used by an individual with disabilities protected under the law.
- Whether the requested accommodation is necessary to make housing available to an individual with disabilities protected under the law.
- Whether the requested accommodation would impose an undue financial or administrative burden on the County.
- Whether the requested accommodation would require a fundamental alteration in the nature of the County's land use and zoning or building program.

The Director, OC Development Services, is the reviewing authority of reasonable accommodation requests. The Director must notify the applicant within 30 days of an approved/denied request and make a written decision on the request within 60 days of the determination date (section 7-9-129). An appeal from the decision of the Director is allowed and would be heard by the Planning Commission. The County did not deny any requests for reasonable accommodation in the last (5th Cycle) planning period.

The County's Codified Ordinances contains the following provisions regarding housing for persons with disabilities:

- **Reasonable accommodation**. In addition to compliance with state and federal accessibility standards, including Title 24 and ADA requirements, Orange County has established reasonable accommodation procedures (sections 7-1-2 and 7-9-122).
- **Concentration limitations.** County codes do not establish maximum concentration requirements for residential facilities. Sober Living Homes are not permitted to be within 1,000 feet of one another (section 7-9-95.6) or with other Alcoholism or Drug Abuse Recovery/Treatment facilities (section 7-9-32.2/Table 7-9-32.2). No permits have been denied due to maximum concentration requirements.
- **Parking standards.** Parking standards are based on use (e.g., single or multifamily, community care facilities), not on the type of occupant. The Zoning Code establishes standards for the number of handicapped parking stalls, including location and dimensions (section 7-9-70).

In addition, the County's building codes require that new residential construction comply with the federal accessibility standards contained in the California Building Code (2022 Edition), California Residential Code (2022 Edition), California Green Building Standards Code (2022 Edition), 2022 California Energy Code and the International Building Code (2021 Edition). In addition, any residential units constructed directly by the County, as well as public accommodations, are subject to provision of the Americans with Disabilities Act (ADA). ADA provisions include requirements for a minimum percentage of units in new developments to be fully accessible to the physically disabled. Provision of fully accessible units may also increase the overall project development costs. Enforcement of ADA requirements is not at the discretion of the County but is mandated under federal law under certain conditions.

Because site development standards contained in the Zoning Code are consistent with building code accessibility requirements, the Zoning Code does not place regulatory constraints on housing for persons with disabilities.

Compliance with building codes and the ADA may increase the cost of housing production and can also impact the viability of rehabilitation of older properties required to be brought up to

current code standards. However, these regulations provide minimum standards that must be complied with to ensure the development of safe and accessible housing.

Definition of Family

The County does not have a definition of family in the Zoning Code. The County does define a single housekeeping unit, not in terms of familial relationships, but instead, to distinguish a for profit enterprise or business, such as a group home or integral facility, from a residential use (section 7-9-135.1). The County's Zoning Code permits group accommodation for unrelated persons by defining "household" broadly as *"all people occupying a single dwelling unit. A household shall also mean all people occupying two (2) dwelling units on the same site if both units are used as group homes owned or operated by the same owner." 'Household' includes the occupants of community care facilities serving six (6) or fewer persons which are permitted or licensed by the State."* (section 7-9-95.1). This definition does not place a constraint on group homes for disabled persons.

The County's Zoning Code provisions for housing for persons with disabilities are discussed below:

- **Community Care Facilities** – Community care facilities are licensed by the California Department of Social Services. These facilities provide non-medical, residential care, and supervision to children or adults in need of a supportive living environment. The services provided may include assistance in dressing and bathing, supervision of client activities; monitoring of food intake; or oversight of the client's property. Pursuant to Health and Safety Code Section 1502, as may be amended, community care facilities include the following: residential facility providing 24-hour care; adult day program; therapeutic day services facility; foster family agency; foster family care home; small family home; social rehabilitation facility community treatment facility; full-service adoption agency; and/or noncustodial adoption agency.

  In accordance with state law, small community care facilities that serve six (6) or fewer persons are permitted by-right in all residential districts. Community care facilities that serve 7 to 12 persons are permitted within any residential zone subject to approval of a Use Permit.

- **Congregate Living Health Facility** – Congregate living health facilities are licensed by the State of California pursuant to Section 1250 of the Health and Safety Code, as may be amended, to provide inpatient care; including the following basic services: medical supervision, 24-hour skilled nursing and supportive care, dependent or catastrophically and several disabled. A congregate living health facility serving more than twelve (12) persons may be permitted in any district zoned for either multifamily residential or hotels subject to the

approval of a Use Permit by Planning Commission pursuant to section 7-9-125. During the previous planning period, 2013-2021, the County issued two Use Permits to congregate living facilities in the Unincorporated areas. No permit applications were denied.

- **Group Homes -** Group Homes are defined as facilities that are "being used as a supportive living environment for persons who are considered handicapped under State or Federal law. A group home operated by a single operator or service provider (whether licensed or unlicensed) constitutes a single facility, whether the facility occupies one (1) or more dwelling units. Group homes under the County's Zoning Code do not include the following: (1) community care facilities; (2) any group home that operates as a single housekeeping unit." (section 7-9-95.1). These types of residences for up to six (6) residents are allowed in any district, planned community, or specific plan area zoned for residential uses, including single-family residentially zoned districts, subject to a ministerial Group Home Permit. Given the ministerial nature of the permit, the permit is not a constraint on serving those with special needs. Group homes, as defined by the County's Zoning Code, operate for profit, and provide a supportive living environment for persons who are considered handicapped under state or federal law. Group home regulations do not apply to residential uses that constitute single housekeeping units. In single housekeeping units, the occupants of a dwelling unit have established ties and familiarity with each other, jointly use common areas, interact with each other, share meals, household activities, and expenses and responsibilities; membership in the single housekeeping unit is fairly stable as opposed to transient, members have some control over who becomes a member of the household, and the residential activities of the household are conducted on a nonprofit basis.

  The County has issued two Group Home Permits since 2020, when the ministerial permit program was first initiated. No permit applications have been denied. Group Homes with seven (7) or more residents are allowed in any district, planned community, or specific plan area zoned for multifamily uses subject to issuance of a Use Permit by the Planning Commission per section 7-9-125. No Use Permits for Group Homes with seven (7) or more residents have been denied. Use Permits for Group Homes with seven (7) or more residents are to assure that the use and scope are compatible with the residential neighborhood, as impacts associated with larger Group Homes have resulted in Code Enforcement complaints from neighbors. The Use Permit allows the County to incorporate conditions, including a requirement that the corporate Group Home draft and maintain a good neighbor policy. These conditions are intended to decrease the impact of larger Group Homes on residential neighborhoods.

- **Sober Living Homes** – Sober living homes are a type of group home operated as a cooperative living environment providing an alcohol and drug-free home for persons recovering from alcoholism and/or drug abuse, which are not required to be licensed by the State. The County of Orange made specified findings related to Sober Living Homes when it adopted an ordinance in 2019. At that time, the Board of Supervisors made findings that in addition to the presence of 158 alcohol and drug treatment recovery beds and 21 licensed facilities and/or certified alcohol and drug treatment programs in the Unincorporated areas, there were at least 10 unlicensed sober living homes for which the County had received Code Enforcement Complaints. The Board of Supervisors found that this concentration of licensed and unlicensed treatment beds in the Unincorporated County areas negatively impacted disabled persons by placing them in communities concentrated with treatment centers, thus, not providing persons with disabilities with an opportunity to "live in normal residential surroundings," but rather places persons with disabilities into living environments bearing more in common with the types of institutional/campus/dormitory living that the California Fair Employment and Housing Act (FEHA) and FHAA were designed to provide relief from and which no reasonable person could contend provides a life in a normal residential surrounding. Like other Group Homes, sober living homes for six (6) or fewer residents are allowed in residential districts, subject to a ministerial Group Home Permit. Also, similarly to other Group Homes, sober living homes of seven (7) or more residents shall be permitted in any zoning district zoned for multifamily residential uses subject to the issuance of a Use Permit by the Planning Commission per section 7-9-125 and compliance with certain conditions. No Group Home permit or Use Permit applications have been denied.

- **Reasonable Accommodations –** The County has a robust reasonable accommodations procedure that allows permitting requirements for Group Homes and Sober Living Homes to be waived or modified for eligible disabled persons pursuant to section 7-9-129 – Reasonable Accommodations.

  Although certain types of housing for persons with disabilities require ministerial or Use Permits for larger homes which could serve as barriers to housing for persons with disabilities, the County's robust Reasonable Accommodation procedures, the fact that no permits have been denied, and no facilities have been closed by Code Enforcement action, demonstrates that rather than a barrier, the County has provided safe neighborhood environments for persons with disabilities.

  The County will review and may modify the group and sober living home ordinances in light of the decision in *The Ohio House v. City of Costa Mesa*, *et al.* Ninth Circuit Court of Appeals Case No. 22-56181 (December 4, 2024) and any

subsequent relevant cases (see Program 8).

On-/Off-Site Improvements

The on- and off-site improvements required for residential projects are determined by the location and type of the proposed project. For example, construction of a single-family home typically undergoes a ministerial permit process, and any site improvement requirements are determined prior to building permit issuance. These site improvements must be provided by the developer in accordance with the applicable sections of the General Plan, Zoning Code, and/or Specific Plan (if applicable). Typical on-site improvements for single-family homes include:

- Grading improvements in compliance with the County's Grading Code
- Drainage improvements in compliance with the County's Master Plan of Drainage
- Stormwater improvements in compliance with the County's Water Quality Ordinance
- Connections for wet and dry utilities in compliance with the County's adopted building codes
- Planting, irrigation, and landscape-related improvements shall comply with the County's Landscape Irrigation Code
- Off-site improvements (e.g., roads and schools) are generally addressed through the collection of impact fees

A residential development that includes one or more lots is considered a subdivision and requires approval of a discretionary permit. Multifamily housing developments also require discretionary approval unless they are exempt under State law. If a multifamily housing development is proposed as a condominium project, the approval process also requires the submittal of a subdivision map. For these multi-unit projects, the County requires the construction of reasonable on- and off-site improvements pursuant to the Subdivision Map Act. Improvements must also comply with the applicable sections of the General Plan, Zoning Code, and/or Specific Plan (if applicable). At a minimum, on- and off-site improvements required of the developer typically include those improvements listed above along with the following:

- Grading and improvement of public and private streets and alleys, including surfacing, curbs, gutters, cross gutters, sidewalks, ornamental street lighting, and safety devices
- Sufficient storm drainage and flood control facilities to carry storm runoff, both tributary to and originating within the subdivision
- Sanitary sewage system serving each lot or unit of the subdivision
- Water supply system providing an adequate supply of potable water to each lot and fire hydrants within the subdivision
- Fire hydrants and connections
- Survey monuments
- Public utility distribution facilities, including gas, electric, and telephone necessary to serve each lot in the subdivision

The County may also require the dedication of parcels of land intended for public use, including:

- Streets, highways, alleys, easements, rights-of-way, and land intended for public use
- Vehicular access rights from any parcel to highways or streets
- Private utility easements required by the various utilities
- Easements for natural and improved drainage facilities
- Area dedicated or reserved for parks, recreational facilities, fire stations, libraries, or other public uses as deemed necessary

Dedicated streets, highways, alleys, easements, rights-of-way, etc. must be designed, developed, and improved according to County standards. Roadway classifications are based on the existing and projected traffic need. These roadway classifications are described in the County's Transportation Element and include Commuter (2 lanes), Secondary (4 lanes), Primary (4 lanes, divided), Major (6 lanes, divided), and Principal (8 lanes, divided). Depending on the classification, right-of-way requirements can range from 40 feet to 142 feet with varying curb-to-curb requirements. Private streets as part of developments are considered by the County on a project-by-project basis and must obtain approval of the Orange County Fire Authority (OCFA).

While site improvements may add to the cost of developing residential units, they are required for the health, safety, welfare, and quality of life for residents. Standards for on- and off-site improvements are identified in the General Plan, Zoning Code, and the County of Orange Standard Plans and do not unduly constrain housing development in the Unincorporated areas.

Building Codes

Orange County has adopted the California Building Code (CBC) (2022 Edition), California Residential Code (2022 Edition), California Green Building Standards Code (2022 Edition), 2022 California Energy Code and the 2021 edition of the International Building Code (IBC), which establish construction standards for all residential buildings. These building codes are used as a collective set of rules to guide new construction, adaptive reuse, and renovation. The County's building codes are based on regulations necessary to protect the public health, safety, and welfare. These minimum standards cannot be revised to be less stringent without sacrificing basic safety considerations and amenities.

The County's building codes are updated, as necessary, and reflect conditions unique to Orange County. They contain minimum building requirements for building/fire protection, structural and seismic safety and installation of devices/fixtures that reduce energy consumption. State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic, or topographic conditions and requires that local governments making changes or modifications in building standards must report such changes to the Department of Housing and Community Development and file an expressed finding that the changes are needed.

Together, building and zoning codes help to preserve the housing stock by requiring owners to maintain their properties in sound condition. As part of the County's effort to preserve existing housing, the County has adopted the strategy of taking a "hands-on" educational approach to code enforcement by working closely with owners to explain and apply these codes that address building violations and substandard housing conditions. Neighborhood Preservation staff (also known as Code Enforcement) now leads a multi-agency effort that often entails coordination with Orange County Fire Authority, County Building Inspection, OC Community Resources, Orange County Health Care Agency, Orange County District Attorney, County Counsel, and other agencies to provide owners with guidance in making needed corrections and repairs, in order to maintain their properties in a safe and maintained condition.

Compliance with building codes may increase the cost of housing production and also impact the viability of rehabilitation and preservation of older properties required to be brought up to current code standards. However, these regulations provide minimum standards that ensure the development of safe and accessible housing and do not serve as constraints, but instead as enhancements for residents.

Development Processing Procedures

Residential Permit Processing

Builders and developers frequently cite the cost of holding land during the evaluation and review process as a significant factor in the cost of housing. Undoubtably, the evaluation and review process required by County procedures contribute to the cost of housing. State law has

established maximum time limits for projects approvals and County policies provide from the minimum processing time necessary to comply with legal requirements and review procedures.

Processing times vary depending on the magnitude and complexity of the development proposal. Factors that can affect the length of development review include the completeness of the development application and the responsiveness of development to staff comments and requests for information. Approval times are sustainably lengthened for projects that are not exempt from the California Environmental Quality Act (CEQA), require rezoning or general plan amendments, or encounter community opposition.

Table 3-4 summarizes the types of housing permitted in each zone. Timeframes for housing permits are described below and shown in Table 3-5.

Procedures and Findings and Conditions for Single-Family and Multifamily Residential Projects

Single-family and multifamily developments may involve discretionary permits as shown in Table 3-4. The type of permit could vary depending on the nature of the development and any deviations from development standards proposed by the developer. Single-family and multifamily developments may require discretionary permits including a Use Permit, Site Development Permit, or General Plan and/or Specific Plan Amendment. Again, this is determined based on the developer's requests.

Orange County Codified Ordinances section 7-9-125.3 sets forth the procedures for all discretionary permits, which includes a 30-day window for OC Development Services to determine whether the application submittal is complete. If the application is incomplete, written notification of the deficiencies is provided to the applicant.

Specific procedures and requirements for each type of discretionary permit are set forth in OCCO sections 7-9-126.1 [Site Development Permit], 7-9-126.2 [Use Permit], Variance Permit [7-9-126.4], Area Plan [7-9-128], General Plan Amendment [7-9-131], Zoning Code Amendments and Zone Changes [7-9-132], and Specific Plan Amendment [7-9-133]. The requirements are not onerous and are intended to provide the County with information about the nature of the planned development, for example, detailed development plans and a description of operating uses and characteristics For General Plan Amendments, the application must include "a statement, supported by documentation, which describes how the proposed amendment conforms to the General Plan's goals and the benefit to the public that will result from approving the proposed change or changes to the General Plan." (OCCO Section 7-9-131.3). Specific Plan adoptions and amendments require similar statements and draft amendments or plans. These are common requirements that allow OC Development Services to understand the nature of the requests and potential impacts.

While Site Development Permits do not require a public hearing and are approved by the Director, all other discretionary permits listed above require public hearings and are considered by either the Zoning Administrator or the Planning Commission, with appeals heard by either the Planning Commission or the County Board of Supervisors.

The following findings are required to be made upon approval of any discretionary permit (OCCO Section 7-9-125.6):

(a)(1) General Plan. The use or project proposed is consistent with the General Plan.

(2) Zoning Code. The use, activity or improvement(s) proposed is consistent with the provisions of the Zoning Code.

(3) CEQA. The approval of the permit application is in compliance with the requirements of the California Environmental Quality Act.

(4) Compatibility. The location, size, design and operating characteristics of the proposed use will not create conditions or situations that may be incompatible with other permitted uses in the vicinity.

(5) General welfare. The approval of the permit application will not result in conditions or circumstances contrary to the public health and safety and the general welfare.

(6) Public Facilities. The approval of the permit application complies with Codified Ordinances Section 7-9-711.

(b) For Variance applications. In addition to the findings required by paragraph one (1) of this subsection, the following findings shall be made by the approving authority prior to the approval of any Variance application:

(1) Special circumstances. There are special circumstances applicable to the subject building site which, when applicable zoning regulations are strictly applied, deprive the subject building site of privileges enjoyed by other property in the vicinity and subject to the same zoning regulations. (The special circumstances shall be specified in the adopted finding.)

(2) No special privileges. Approval of the application will not constitute a grant of special privileges which are inconsistent with the limitations placed upon other properties in the vicinity and subject to the same zoning regulations, when the specified conditions are complied with.

(c) Modified development standards. If the land use regulations of a planned community or specific plan allow a discretionary permit, other than a Variance Permit, to modify the site development standards to be less restrictive than otherwise stated in the enabling ordinance, the following finding shall be made in

addition to "(1)" above: "The alternative development standard(s) will result in an equivalent or better project in terms of adverse impacts and public benefits to the immediate and surrounding community."

(d) New use allowed. Where the enabling ordinance authorizes a discretionary permit to allow a principal use not specifically identified as permitted or prohibited, the following additional finding shall be made in addition to "(1)" above: "The proposed use is consistent with the purpose and intent of the (name) district/planning area."

These findings ensure the orderly development of residential and other uses within the County Unincorporated Areas.

Discretionary permits for single-family and multifamily developments may also include conditions of approval that ensure compliance with State and Federal laws. For example, conditions vary based on the development proposed and its location, but conditions may include requirements such as: (1) completion of a Water Quality Management Plan pursuant to State law prior to the issuance of building and grading permits; (2) detailed landscape plans to assure compliance with requirements for native and drought resistant plants; (3) submission of fire master plans to assure the safety of residents and compliance with State and local fire regulations pertaining to development; (4) demonstrated compliance with the County's National Pollutant Discharge Elimination System (NPDES) Implementation Program to ensure compliance with federal law; (5) submission of a Stormwater Pollution Prevention Plan; (6) submission of an Erosion and Sediment Control Plan; (7) submission of drainage and/or geology studies; (8) indemnification of the County.

The County limits conditions imposed on discretionary permits as much as possible with an eye toward only imposing conditions necessary to comply with state and/or federal law or conditions to assure safety and compatibility of the project proposed. The discretionary permit findings and conditions do not impose an improper burden on applicants, but instead assure a streamlined process for compliance with all applicable laws and regulations.

In July 2024, the County removed the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable units (see Program 2). These uses will be allowed as a by-right use. For multifamily development with 5 or more units, the Site Development Permit requirements will be amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards for certain projects. The County adopted Objective Design Standards (ODS) to provide local guidance on design and standards for housing development, including by-right projects, as allowed by State law and the Housing Accountability Act which prohibits a local agency from disapproving or reducing the density of housing development projects that comply with local and state regulations unless the agency can make certain written findings.

The County also created an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law (see Program 3).

Table 3-4
Housing Types Permitted in Residential Zoning Districts

Uses	AR	E1	RHE	E4	RE	R1	RS	R2	R3	R4
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P	P
Alcoholism or Drug Abuse Recovery/Treatment Facilities Large	-	-	-	-	-	-	-	UP 1,2	UP 1,2	UP 1,2
Alcoholism or Drug Abuse Recovery/Treatment Facilities Small	P	P	P	P	P	P	P	P2	P2	P2
Community Care Facilities- Large (7-12 people)	UP	UP	UP	UP	UP	UP	UP	UP1	UP1	UP1
Community Care Facilities- Small (1-6 people)	P	P	P	P	P	P	P	P	P	P
Congregate Living Health Facility Large (7-12 people)	UP	UP	UP	UP	UP	UP	UP	UP1	UP1	UP1
Congregate Living Health Facility Small (1-6 people)	P	P	P	P	P	P	P	P	P	P
Duplex	-	-	-	-	-	-	-	P	P	P
Farmer Dwelling Unit	P6	P6	-	-	-	-	-	-	-	-
Farmer Housing Complex	P6	P6	-	-	-	-	-	-	-	-
Group Home Large	-	-	-	-	-	-	-	UP 1,2,3	UP 1,2,3	UP 1,2,3
Group Home Small	P	P	P	P	P	P	P	P 2,3	P 2,3	P 2,3
In-home Child Care Large	P	P	P	P	P	P	P	P	P	P
In-home Child Care Small	P	P	P	P	P	P	P	P	P	P
Mobile home Developments	-	-	-	-	-	-	-	UP	UP	UP
Multifamily Dwelling										
2-4 Units	-	-	-	-	-	-	-	P	P	P
5 or More Units	-	-	-	-	-	-	-	SDP	SDP	SDP
Condo	-	-	-	-	-	-	-	UP5	UP5	UP5
Other Housing										
Planned Development	UP	UP	UP	UP	UP	UP	UP	UP	UP	UP

Table 3-4
Housing Types Permitted in Residential Zoning Districts

Uses	AR	E1	RHE	E4	RE	R1	RS	R2	R3	R4
Senior Citizen Housing Development	-	-	-	-	-	-	-	SDP/ UP5	SDP/ UP5	SDP/ UP5
Single-Family OR Mobile home	P	P	P	P	P	P	P	P	P	P
Sober Living Home Large	-	-	-	-	-	-	-	UP	UP	UP
Sober Living Home Small	P	P	P	P	P	P	P	P/UP	P/UP	P/UP
Supportive Housing	P	P	P	P	P	P	P	P	P	P
Transitional Housing	P	P	P	P	P	P	P	P	P	P

P Permitted By-Right
SDP Site Development Permit
UP Use Permit
- Not Permitted

A1 “General Agricultural” District
AR “Agricultural Residential” District
E1 “Estates” District
RHE “Residential Hillside Estates” District
E4 “Small Estates” District
H “Housing Opportunities” Overlay District5
MX “Mixed-Use” Overlay District5
RE “Residential Estates” District
R1 “Single-Family Residence” District
RS “Residential, Single-Family District”
R2 “Multifamily Dwelling” District
R3 “Apartment” District
R4 “Suburban Multifamily Residential” District

Notes:
1. Facilities serving seven (7) or more persons, and senior living facilities, shall be subject to the approval of a Use Permit to the Planning Commission.
2. There shall be one thousand (1,000) feet of separation (as measured from property lines) between any two (2) Alcoholism or Drug Abuse Recovery/Treatment facilities of seven (7) or over that require a UP, or between any two (2) Sober Living Homes, or between any Alcoholism or Drug Abuse Recovery/Treatment facility and Sober Living Home, as defined.
3. Group Homes, including Sober Living Homes, shall obtain a ministerial "Group Home Permit."
4. Multifamily projects of no more than two (2) units as a residential condominium, stock cooperative, and community apartment projects are permitted subject to a Use Permit.
5. Multifamily projects of four (4) or fewer dwelling units are permitted. Multifamily projects of five (5) or more dwelling units are permitted subject to a Site Development Permit. Residential condominium, stock cooperative, and community apartment projects are permitted subject to a Use Permit.
6. Farmworker housing shall be allowed only on land with an ongoing agricultural use.

Source: County of Orange Zoning Code, 2020

Table 3-5 identifies the typical processing time most common in the permitting process for ministerial and discretionary permits. It should be noted that each project does not necessarily have to complete each step in the process (i.e., multiple-family projects less than 5 units may be permitted by-right dependent on the residential zone). Also, certain review and approval procedures may run concurrently. For example, the County allows concurrent processing of permit application for building permits requiring discretionary permit review.

Table 3-5
Typical Project Processing Times Frames by Housing Project Type

	Housing Type Project		
	Single-Family and Second Unit (ADU/JADU)	**Single Family Subdivision**	**Multifamily**
Typical Processing Procedures	▪ Zoning Plan Check ▪ Building Plan Check	▪ Tentative Map ▪ Review Final Map ▪ Zoning and Building Plan Check	▪ Site Development Permit ▪ Use Permit ▪ Zoning and Building Plan Check ▪ Environmental Review
Reviewing Body	▪ Ministerial Review by County Staff	▪ Planning Commission ▪ Board of Supervisors	▪ Could vary by development, but could include Discretionary Review by Director, Planning Commission, or Board of Supervisors
Estimated Total Processing Time	3 to 6 Months	6 to 9 Months	12 to 24 months
Estimated Total Time Between Project Approval and Application for Building Permits	NA	6 to 9 Months	Up to 24 months

Source: OC Development Services, 2023

Permit Processing Timeframes – Discretionary Permits

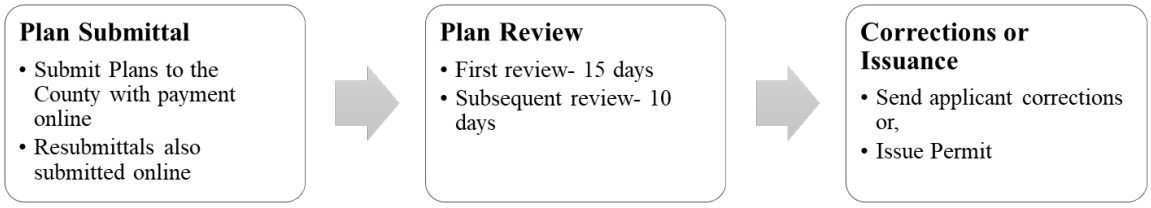
Single-family and multifamily residential projects requiring discretionary actions, such as Use Permits and/or zone changes, necessitate a higher level of review, resulting in a longer processing timeline. Orange County's development approval process is designed to accommodate, not hinder, appropriate development. Approval of discretionary permits for residential uses can typically be processed within 120 days after submission to the County. Recently, the following residential developments were granted entitlements (approval of discretionary permits) in the timeframes indicated (not including building permit processing):

- Casa Paloma (affordable housing): 2 months
- Potter's Lane (affordable housing): 4 months
- The Retreat (luxury senior housing): 9.5 months
- Madison Court (detached condominiums): 16 months

Permit Processing Timeframes - Compliance with Permit Streamlining Act Ministerial Building Permits

Projects that do not require a Site Development Permit or a Use Permit, are permitted by-right and can obtain building permits directly. The process to obtain residential building permits is outlined in **Figure 3-1**, Residential Building Permit Process.

Figure 3-1 Residential Building Permit Process



Single-family home. Construction of a single-family home on a legal building site does not require discretionary approval but requires only grading and/or building permit issuance. The County's permitting process policy identifies a timeframe of 15 business days for first plan check and 10 business days for second plan check and includes concurrent planning and zoning review for compliance with local and State building codes prior to permit issuance.

Single-family residential subdivision. In the Unincorporated areas, residential subdivisions may contain as many as 150 units, or more. The number of units in the subdivision will greatly affect the number of days from submittal of application(s) to issuance of permits. The information below is based upon the average number of days from application submittal to permit issuance for all residential subdivisions regardless of number of units.

Based on data from building permits issued in the years 2020-2021 for new single-family residential subdivisions, it takes an average of 250 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 4-5 plan check reviews, an average of 48 total business days in plan check with the County, and the remainder of the time frame with the applicant. New single-family developments within a planned community have also taken an average of 250 days from submittal of building permit application (plan check initiation) to permit issuance but had an average of 2-3 plan check reviews and an average of 19 total business days in plan check with the County. The target turnaround time for developments located within a planned community is 7 business days for the first plan check, 5 business days for the second plan check, and 3 business days for all subsequent rechecks.

Larger subdivision projects are typically more complex and may be referred to the Planning Commission and/or the Board of Supervisors for approval.

Multifamily residential development. Much like residential subdivisions, multifamily projects may contain as many as 100 units, or more. The number of units in the multifamily project will

greatly affect the number of days from submittal of application(s) to issuance of permits. The information below is based upon the average number of days from application submittal to permit issuance for all multifamily projects regardless of number of units.

In the case of multifamily development, the process begins with the submittal of a discretionary Site Development Permit which is subject to administrative approval and typically does not require a public hearing. However, large developments are typically more complex and may be referred to the Planning Commission and /or Board of Supervisors for approval.

Based on data from permits issued between 2016-2021 for new multifamily developments, it takes an average of 280 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 4-5 plan check reviews, an average of 50 total business days in plan check with the County, and the remainder of the time frame with the applicant. The target turnaround time for multifamily developments is 15 business days for first plan check and 10 business days for subsequent rechecks and includes concurrent planning and zoning review for compliance with local and State building codes prior to permit issuance.

Between 2020-2021, new multifamily developments located within a planned community had an average of 290 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 5-6 plan check reviews and an average of 29 total business days in plan check with the County. The target turnaround time for developments located within a planned community is 7 business days for the first plan check, 5 business days for the second plan check, and 3 business days for all subsequent rechecks.

Length of Time between Application Approval and Building Permit Issuance

The length of time between receiving approval for a housing development and submittal of an application for building permits is influenced by several factors, none of which are directly impacted by the County. Factors that may impact the timing of building permit issuance include completion of construction drawings and detailed site and landscape design; securing construction and permanent financing; real estate transaction schedules, and retention of a building contractor and subcontractors. The County uses in-house and contracted staff for building plans check which allows for working closely with applicants through the review process and close monitoring of projects, which results in expedited review of projects. Table 3-5 includes estimated total time between project approval and application for building permits. For multi-family projects, applications can take up to 24 months from the time an application is filed and building permits applications are submitted. For single family projects, the typical timeframe is 6 to 9 months.

Compliance with Permit Streamlining Act

From the date an application is submitted, the County internally tracks the amount of time that the application materials have been pending, which reviews are completed, and whether there is

additional information needed from the applicant. The County's computer system tracks permit streamlining deadlines. The time the County takes between finding an application complete and issuance of relevant permits complies with the Permit Streamlining Act. Specifically, the County conducts pre-application screenings with applicants to ensure that, once submitted, the County can quickly inform the applicant whether the application is complete within 30-days of its submission. (Gov. Code, section 65943.) The County also maintains detailed lists of information required for each type of permitting application in order to inform potential applicants of what is required for a complete permitting application. (Gov. Code section 65940.) If additional information is required, County staff notifies the applicant within 30 days of the submission of the additional information required through the plan check process. The County timely reviews each new or additional submission within 30 days of when it is received. (Gov. Code section 65943.) For discretionary projects that trigger the Permit Streamlining Act, the discretionary approval is generally issued simultaneously with the approval of the appropriate environmental documentation, consistent with the requirements of state law. (See Gov. Code sections 65950-65957.)

Programs to Address Development Processing Procedures Constraint

In addition, to address this issue, minimize the impact of the County's review process on the cost of housing, and to facilitate the timely and efficient processing of residential development, the County has enhanced both its in-person and web-based services and has created a permitting process that is 100% paperless.

The County established the County Services Center (CSC) which is a "One Stop Shop" resource for developers, property owners and builders. In the CSC, customers can obtain assistance, information, and step-by-step guides regarding the development process and regulations. This facility also serves as a centrally coordinated location to submit permit applications, plans, and fees. The CSC also offers Express Permits which are simple permits that can be approved within 1-2 business days.

The County has been proactive in implementing strategies to remove development constraints and facilitate development of housing:

- In July 2024, the County removed the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable For multifamily development with 5 or more units, the Site Development Permit requirements were amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards as allowed by State law and the Housing Accountability Act (see Program 2).
- The County also created an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed

including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law (see Program 3).The process went into effect in July 2024.

Additionally, OC Public Works has enhanced its electronic resources to deliver processing services and provide information to residential developers more effectively. The OC Development Services website provides continuous access to filing instructions and applications as well as information regarding permit fees and deposits. The County currently offers an online permitting portal – myOCeServices (https:myoceservcies.ocgov.com) for all permit types, including building permits, planning applications, encroachment permits, subdivision applications, and improvement plans. Plans are submitted electronically, and applicants have the ability to check the status of their applications/permits as they are being reviewed. Applicants can request inspections and view results online as well as obtain final inspection results and Certificates of Occupancy. Issuance of building permits is completed electronically, and the approved plans are immediately available for the applicant via the myOCeServices portal.

To further facilitate an efficient and timely review process, the County allows concurrent processing of permit applications. Applicants may concurrently submit an application for building permits as their proposed project undergoes discretionary permit review and approval. Applicants must complete a form and submit an affidavit that are both readily available on the County's website. This is regular practice for housing development projects.

Environmental Review

Environmental review is required for all development projects under the California Environmental Quality Act (CEQA), and for projects that receive federal funds under the National Environmental Policy Act (NEPA). An Environmental Impact Report (EIR) is required by CEQA of all developments that have the potential of creating significant impacts that cannot be mitigated. All of the planned communities which make up the southern and eastern portions of Unincorporated Orange County required the preparation of EIRs. The only significant areas left to develop are future phases of the "Ranch Plan Planned Community" on Rancho Mission Viejo properties. Most infill residential projects in the Unincorporated County are either Categorically Exempt or require only an Initial Study and Negative Declaration (or Mitigated Negative Declaration). The Negative Declaration process typically takes 3-4 months to prepare, plus the mandated public review period.

The environmental review process can provide useful information for the County about impacts on local environments and needed mitigation measures, as well as useful construction and market information for builders, buyers, lenders, and others. In contrast, the process may be viewed by some parties as an expensive, complex, and time-consuming burden. However, because

environmental review is required by state law (CEQA) and federal law (NEPA), it does not pose a significant constraint to housing development.

Development Fees and Improvement Requirements

Development fees include the County's cost of processing applications and permits, as well as costs associated with the provision of public facilities required to serve new residents (often referred to as "impact fees").

Application and Permit Processing Fees

The County has adopted a hybrid fee system which includes a variety of fee types. The majority of building permit fees for both residential and commercial uses are calculated using the valuation-based system. Flat fees are charged for safety-related and simple ministerial permits, and actual costs are recovered for discretionary and grading permits. Based on the 2024-2027 fee schedule, there are approximately 24% valuation-based fees, 36% flat fees, and 40% time-material cost-based fees. The County conducts an audit of processing costs periodically to ensure that fees do not exceed actual costs. The latest fee update occurred in July 2024. Initial fee deposits as of July 2024 are shown in **Table 3-6**. These fees are re-evaluated and re-adopted by the Board periodically as needed to adjust to economic conditions.

Many processing fees are a result of state or federal mandates, such as plan check and inspection to ensure public health and safety of grading, flood control facilities, roads, bridges, and construction of buildings. Other costs are associated with state and federal requirements for protection of the environment such as Water Quality Management Plans under the Clean Water Act and National Pollutant Discharge Elimination System (NPDES), or Habitat Conservation Plans under the state's Natural Communities Conservation Program.

The County has adopted several cost-saving measures to reduce permit processing fees, including the following:

- A simplified "by-right" approval process for qualifying multifamily projects in the Housing Opportunities Overlay Zone.
- Pre-filing meetings to assist developers in preparing application packages with no charge for the first three hours of staff time for these meetings.
- Planning and permit fee schedule reviewed on an annual basis.
- Annual review of park in-lieu fees to reflect current market values.
- Waiver of park fees for affordable housing projects.

Table 3-6
FY 2024-27 Planning and Development Fees

Fee Category	Deposit Amount*
Planning and Application Fees	
Tentative Parcel Map	$7,500
Final Parcel Map	$3,000
Tentative Tract Map	$10,000
Final Tract Map	$5,500
Use Permit	$7,000-10,000
Variance	$5,000-10,000
Area Plan	$8,000
Site Development Plan	$7,000-10,000
Zone Change	$10,000
General Plan Amendment	$10,000
Specific Plan Amendment	$10,000
Environmental	
Environmental Impact Review	$10,000 + 10%
Negative Declaration	$7,500 + 10%
Source: County of Orange, July 2024 ** Items with deposits are based on actual processing costs which may exceed initial deposit amount*	

Public Facility (Impact) Fees and Improvement Requirements

After the passage of Proposition 13 in 1978 (Article 13A of the California Constitution) and its limitation on local governments' property tax revenues, cities and counties have faced increasing difficulty in providing public services and facilities to serve their residents. One of the main consequences of Proposition 13 has been the shift in funding of new infrastructure from general tax revenues to development impact fees and improvement requirements on land developers. The County requires developers to provide on-site and off-site improvements necessary to serve their projects, including water, sewer and other utility extensions, street construction, and traffic control device installation that are reasonably related to the project. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities, and school sites, consistent with the Subdivision Map Act. Many of these fees are under the control of other agencies such as school districts, water and wastewater districts, the Transportation Corridor Agencies and Orange County Transportation Authority, and the County has no authority over their amount or collection process. Impact fees that are controlled by the County of Orange are as follows:

- Library.
- Streets and highways.
- Drainage facilities.
- Local parks.

Development fees are passed on to renters and homebuyers in the cost of housing, and thus affect housing affordability. Fees associated with the extension and installation of utilities can be particularly demanding. Most agencies involved in the County's development review process obtain a majority of the revenue for their operations through development fees, and this trend is likely to continue in the future. These fees also help ensure quality development and the provision of adequate public services. For high priority affordable housing projects in the past

the County has used redevelopment housing set-aside funds to help pay application fees and other costs associated with the development review process. **Table 3-7** shows development impact fees applied to new housing developments.

Table 3-7
Development Impact Fees – 2021

Fee Category	Fee Amount (per unit)
Parks	$3,290 – 20,800/unit
Roads	$919 – 24,655/unit
Toll Roads (Transportation Corridor Agencies)	$2,513 – 6,056/unit
Schools	$1.68 – 4.08/sq. ft.
Source: County of Orange, September 2021	

The July 2020 fee update resulted in an increase in the overall cost of planning and permitting services. The fees listed in **Table 3-7** can be found on the County's website.

In order to reduce the effects of fees on lower-income housing, the Board of Supervisors provided assistance to affordable projects in 2009 by adopting an ordinance to waive park fees for qualifying density bonus projects. Although development fees represent a significant component of housing costs, the County does what it can to minimize fees.

In order to estimate the effect of development fees on the total cost of housing, **Table 3-8** shows the fees that were paid by a recent affordable project in the Unincorporated areas. This project is located within the Housing Opportunities Overlay Zone and was completed in 2016. As noted in the table, impact fees represented 1.54% of total project cost, and permit processing fees were just 1% of total cost. This analysis demonstrates that the combined cost of permit processing and impact fees represent about 2.14% of the total cost of a typical project in the Unincorporated areas.

Table 3-8
Representative Multifamily Development Cost Example

Item	Total Project Cost	Cost per Unit[1]	% of Total
Land & off-site improvements	$624,750	$39,047	9.0%
Construction	$4,337,849	$271,116	62.3%
Architecture & survey	$415,954	$25,997	6.0%
Construction interest & legal	$219,631	$13,727	3.2%
Other soft costs (reserves, TCAC, marketing, etc.)	$700,369	$43,773	10.1%
Park fees	$58,163	$3,635	0.8%
School fees	$16,368	$1,023	0.2%
Road fees	Not required	Not Required	Not required
Sanitation District fees	$32,810	$2,051	0.5%
Permit processing	$143,580	$8,974	2.1%
Developer profit	$416,000	$26,000	6.0%
Total Costs	$6,858,284	$435,343	100%
[1]Based on 16 units in Midway City			

Senate Bill 35 (Streamlining Affordable Housing Approval)

California Senate Bill 35 (SB 35), codified as Government Code Section 65913.41, was signed on September 29, 2017, and became effective January 1, 2018. SB 35 will automatically be 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 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.

As of 2018, when a jurisdiction has made insufficient progress toward meeting their above-moderate-income and lower-income RHNA goals, and/or have not submitted the latest Housing Element Annual Progress Report (APR), it is subject to the streamlined ministerial approval process (SB 35 (Chapter 366, Statutes of 2017) streamlining) for proposed developments with at least 50% affordability. All projects, which propose at least 50% affordable units are eligible for ministerial approval under SB 35 as determined by the SB 35 Statewide Determination Summary. To be eligible for SB 35 approval, sites must meet a long list of criteria, including:

- A multifamily housing development (at least two residential units) in an urbanized area.
- Located where 75% of the perimeter of the site is developed.
- Zoned or designated by the general plan for residential or mixed-use residential.
- In a location where the locality's share of regional housing needs has not been satisfied by building permits previously issued.
- One that includes affordable housing in accordance with SB 35 requirements.
- Consistent with the local government's objective zoning and design review standards; and
- Willing to pay construction workers the state-determined "prevailing wage."

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

- 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.

- A site with existing multifamily housing that has been occupied by tenants in the last ten years or is subject to rent control.
- A site with existing affordable housing.

According to State HCD's SB 35 Statewide Determination Summary (based on APR data received as of June 25, 2019), the County of Orange has not made sufficient progress towards its lower-income RHNA and is therefore subject to SB 35. The County is subject to streamlined ministerial approval review for proposed housing developments with at least 50% affordability.

Non-Governmental Constraints

Environmental Constraints

Environmental constraints include physical features such as steep slopes, fault zones, floodplains, sensitive biological habitat, and agricultural lands. In many cases, development of these areas is constrained by state and federal laws (e.g., FEMA floodplain regulations, the Clean Water Act, the Endangered Species Act, and the state Fish and Game Code and Alquist-Priolo Act). OC Public Works and other County agencies have the responsibility to enforce County policies and ordinances regulating development on flood plains, areas of potential seismic hazard, areas of excessive slope, conservation areas, areas with inappropriate conditions for septic tanks, and other environmental issues. Large portions of the remaining Unincorporated County have one or more of these constraints. These problems usually reduce the density allowed and bring into play mitigation measures and other necessary requirements, which add to the total cost of the project. OC Public Works has developed an environmental database with an extensive mapping system that is used in conjunction with the General Plan to facilitate a timely identification of environmental hazards and resources.

The County's land use plans have been designed to protect sensitive areas from development to the extent feasible, and to protect public safety by avoiding development in hazardous areas. Significant areas of sensitive habitat in the central, coastal, and southern portions of the County have been set-aside as permanent open space through adopted Multi-Species Habitat Conservation Plans. While these policies and plans constrain residential development to some extent, they are necessary to support other public policies.

Five major environmental conditions constrain development in Orange County: noise, floods, wildland fires, geologic/seismic hazards, and natural and cultural resources.

- **Noise:** The major sources of significant noise in Orange County are aircraft and highway vehicles. While both can usually be mitigated to acceptable levels indoors, aircraft noise cannot be mitigated outdoors because of its overhead source. State law and County policy prohibit residential development and similar noise sensitive uses in high-noise (+65 decibel Community Noise Equivalent

Level – CNEL) areas near John Wayne Airport. Noise in non-residential developments must be attenuated to protect users in those areas. Near major streets and highways, noise must also be attenuated. Thus, high-noise conditions may preclude certain uses in some areas and may increase development costs.

- **Flood Hazards:** Portions of Orange County are located in floodplain areas of varying degrees of risk, subject to "100-" and "500-year" floods. In many cases, development can occur in these areas through proper site planning, although mitigation costs may be high. There are, however, some areas where development in a floodplain is difficult and expensive to protect a project from extreme flood hazard.
- **Fire Hazards:** Large areas of Unincorporated Orange County are located within a high to very high fire hazard areas as defined by the California Department of Forestry and Fire Protection (CAL FIRE). CAL FIRE map areas of Very High or High Fire Severity Zone (FHSZ) within Local Responsibility Areas (LRAs) and State Responsibility Areas (SRAs). Development within FHSZ requires careful consideration of elements which may increase the risk of wildfires, such as vegetation, topography, and ember movement. Development in these areas is required to comply with the following construction requirements such as, but not limited to:
    - Fire sprinklers in all buildings
    - Ignition resistant construction materials
    - Class A roofing materials and assemblies
    - Defensible space
    - Two-lane street widths

  These requirements would increase development costs and would have an impact on the number of new housing units constructed within the FHSZ.
- In addition to higher construction costs, given that a few insurers have decided to not write new policies in California, homeowners living in fire-prone areas may find it more difficult to obtain affordable fire insurance as the fire season grows longer and wildfires grow in intensity every year in California.
- **Geologic/Seismic Hazards:** Like the entire Southern California region, Orange County is located within an area of high seismic activity. Potential slope and seismic hazards constrain development in certain parts of the County. While both conditions seldom preclude development, they may ultimately increase the cost of construction.

- **Natural and Cultural Resources:** The presence of natural or cultural resources on vacant land may influence its future use. For example, critical habitat areas or archaeological sites may require preservation or sensitive planning. Such conditions may preclude development or increase the cost of construction.

No environmental constraints have been identified on any 6th Cycle Housing Element candidate housing site.

Infrastructure Constraints

Many rapidly growing areas – especially southern portions of the County – have found it difficult to expand infrastructure fast enough to keep up with new development. Development places demands on all public services. It is the County's policy that the infrastructure for water, sewer, drainage, and roads be in place before urban development is permitted. One method for controlling the pace of growth is by limiting capital investment in these facilities. Simply, if the capacity is not available, the development cannot occur. In some cases where capacity is inadequate, private developers may be required to construct the backbone infrastructure or incremental upgrades to existing facilities to serve large developments. Because facilities require huge front-end capital expenditures, some form of municipal financing may be needed.

The network of man-made and publicly owned facilities, such as roads, streets, water, drainage, and sewer facilities form the internal framework, or infrastructure, of communities. The timing and pattern of installing these facilities (capital improvements) will play a part in the implementation of the County's General Plan by impacting the distribution of land uses.

Although capital facilities are built to accommodate present and anticipated needs, some (most notably water and sewer facilities, and roads) play a major role in determining the location, intensity, and timing of future developments.

OC Public Works provides services on a regional basis, to Unincorporated areas, and to other County agencies and departments. Chief among its regional services is providing flood protection countywide. OC Public Works operates and maintains the Orange County Flood Control District, a system of 350 miles of flood control channels, dams and other infrastructure that is continually built and expanded upon.

In lieu of considering individual projects or only those projects to be undertaken in a single year OC Public Works prepares and revises an annual Business Plan. The Business Plan projects annual expenditures for acquisition, construction, rehabilitation, and replacement of public facilities, such as flood control, Unincorporated roadway improvements, streetlights, traffic signals, agricultural commissioner and weights and measures programs, as well as the countywide system of harbors, beaches, and parks. Future growth in Orange County requires the delivery of adequate services to all residents in the Unincorporated County.

While infrastructure imbalances exist in all urban jurisdictions, these imbalances are typically addressed through development phasing, the use of developer agreements and other mechanisms. A brief summary of the principal infrastructure systems serving the County follows:

- **Water:** Approximately 50% of Orange County's water supply is imported into Southern California via the facilities of the Metropolitan Water District (MWD) of Southern California. MWD supplies are delivered by two principal facilities: (1) the Colorado River Aqueduct; and (2) the State Water Project. The rest of Orange County's water supply comes from underground aquifers, several small groundwater basins, and recycled wastewater [17]. The groundwater supply is replenished by direct rainfall and other surface water that infiltrates into the ground, imported water purchased from MWD and recycled water.

  The County of Orange has fourteen water districts and seventeen cities providing potable water to its residents and businesses. All these agencies purchase water through the Municipal Water District of Orange County (MWDOC) except for the cities of Anaheim, Fullerton, and Santa Ana which purchase directly from MWD. The County itself is not a provider of water. Rather Unincorporated areas are served by a variety of public and private providers.

  Water supply has always been a critical issue for Southern California, with local sources of water providing less than half of the area's water needs. In addition to some other resources (such as petroleum or mineral extraction), the County lacks enough water resources to meet its own needs. The direct implication of this deficiency is that the County has become more dependent on imported resources and, as a consequence, is increasingly vulnerable to actions and policies which it cannot directly influence much the same way that local jurisdictions are unable to influence the pricing and availability of imported oil supply allocations.

  To lessen the constraints of insufficient local capacity to meet the County's water demand, the majority of the necessary large-scale improvements within Orange County are projects to improve existing storage reservoirs or build additional storage facilities in south Orange County. The local water conveyance system will be implemented in conjunction with development phasing to meet the delivery demands in Orange County. Since 2008, the Groundwater Replenishment System Project, developed by the Orange County Water District (OCWD) and the Orange County Sanitation District (OCSD), has added 72,000 acre-feet to the groundwater basin every year. With increased water carrying capacity, this and other local and state/regional enhancements should lessen water-related constraints to new construction of housing in the Orange County market.

[17] Source: https://www/mwdoc.com/wp-content/uploads/2017/05/Water-Supply.pdf

- **Sewer:** The collection, treatment, and disposal of wastewater in Orange County are undertaken by special districts and local governments. The County is not a provider of sewer service. The OCSD collects and treats wastewater for the northern and central areas of Orange County. There are seven districts that presently serve numerous cities plus Unincorporated areas within the Districts' boundaries. The Districts' facilities collect the sewage from local cities, sanitary districts, County water districts, and sewer maintenance districts. Wastewater is then transported through the Districts' trunk sewers to the two major treatment facilities located in Fountain Valley. In the South County, sanitation services are provided by the South Orange County Wastewater Authority (SOCWA). SOCWA has ten member agencies and owns or operates four treatment facilities. The authority for sewer services in Unincorporated areas not served by sanitary or water districts rests with the Orange County Board of Supervisors. The funding for sewer services is provided by property taxes, augmentation funds, user fees, or investment income from reserves.

  With these complex, coordinated infrastructure systems, the ability of the various special sewer districts to expand treatment capacities in an incremental fashion, as well as to construct new facilities where needed, has facilitated its rapid growth.

  Most wastewater management agencies have long-range plans to address needed plant expansion/upgrading, based on anticipated population growth within their service areas. As a result of these, and comprehensive water supply studies such as the County Water Plan, the County's wastewater/sewage infrastructure should not serve as a direct constraint to the production of housing to meet the anticipated demand from population growth.

- **Flood Control:** Orange County's flood control effort is divided among three major areas: Tri-County system (San Bernardino, Riverside and Orange Counties), regional system, and local drainage program. With respect to the regional system, the Orange County Flood Control District (OCFCD) is empowered to construct and maintain flood control works to prevent or minimize loss of life and property caused by flooding, and for water conservation. In the County's local drainage program, the storm drains are normally smaller facilities that collect drainage from local streets. In new developments, local drainage facilities are constructed by developers in accordance with master plans of drainage. In many older parts of Orange County, however, local systems were not built due to lack of major systems to accept their discharge. Limited funding from the County's General Fund or the Road Fund is used to implement local storm drains.

- **OC Public Works – Flood Programs** is responsible for implementing the Flood Control District's funded activities program, which includes the design, construction, operation, and maintenance of regional flood control facilities. Flood Control District revenue is obtained mainly from property taxes. The amount of Flood Control District revenue derived from property taxes is based on the average percentage received during the three years prior to the passage of Proposition 13, plus a proportionate share of the subsequent tax base growth. A main charge of the OC Public Works Flood Programs is providing flood protection countywide. The Santa Ana River Project is the largest and most expensive such project. During 1999, for example, construction was completed on the Seven Oaks Dam and channel improvements throughout Orange County. These improvements now provide protection from flooding up to the 100-year magnitude for most of Orange County residents and businesses.

  While not a direct constraint, the continued monitoring and implementation of the 1987 Clean Water Act will help guide new development, steering it away from areas that may be susceptible to flood damage. The County's available flood control infrastructure, along with continued flood plain management and successive implementation of the Flood Control District's master plan, should minimize any undue constraints to the production of affordable and/or market rate housing in the County.

Land Costs

Land represents one of the most significant components of the cost of new housing. Land values fluctuate with market conditions and the recent downturn in the housing market has affected land values negatively. Changes in land prices reflect the cyclical nature of the residential real estate market, and home prices and land values have experienced an increase in 2020 compared to previous years.

Land costs can also pose a significant constraint to the development of affordable and moderate-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., soil stability, seismic hazards, flooding) can also be factored into the cost of land. A July 2021 Zillow search for lots returned a number of properties ranging from $20 million for 35.96 acres east of Brea, $10,500,000 for 6,534 square feet in Emerald Bay, to $75,999 for 0.81 acres in Silverado Canyon. The average cost of land in Unincorporated Orange County is $20.89 per square feet. The holding cost of land during construction also adds to the price of housing. Holding costs vary depending on interest rates for acquisition and development loans. Interest rates are beyond the control of local jurisdictions. Reducing processing times for building permits in most jurisdictions can lessen land holding costs. However, the County's processing times are already among the most

efficient in Orange County, and to reduce them further may compromise the County's ability to protect public health and safety.

Other factors affecting the costs of land include overall availability of developable lots within a given sub-region; environmental site conditions and constraints; public service and infrastructure availability; aesthetic considerations such as views, terrain, and vegetation; the proximity to urban areas; parcel size; and existing housing inventory. As a result of the proliferation of short-term rentals in the community, the County adopted short-term rental regulations to track and monitor these units as part of its Comprehensive Zoning Code Update adopted in July 2020. Since its inception through June 30, 2023, 76 short-term rental permits have been approved; subsequently, the short-term rental regulations have a minimal impact on the cost and supply of housing.

Most importantly, land availability and permitted development density determine land prices. As land becomes scarcer, the price of land increases. And in related fashion, land prices have a positive correlation with the number of units permitted on each lot – that is, the more units permitted under General Plan land use guidelines, the higher the value of that land. In addition, more remote areas generally have less expensive (and larger tracts) of land, while smaller, more expensive parcels are typically located closer to urbanized areas. The County cannot control land prices, as they are set in the marketplace and are governed by such factors as speculation, demand, supply, and location.

Construction Costs

Construction costs vary widely according to the type of development, with multifamily housing generally less expensive to construct than single-family homes on a square-foot and per unit basis. However, there is variation within each construction type, depending on unit size and the quantity and quality of amenities provided. One indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The ICC was established in 1994 with the goal of developing a single set of national model construction codes, known as the International Codes or I-Codes. The ICC updates the estimated cost of construction at six-month intervals and provides estimates for the average cost of labor and materials for typical Type VA protected wood frame housing, which is commonly used in the construction of newer apartment buildings with no exposed wood visible. Estimates are based on “good-quality” construction, providing for materials and fixtures well above the minimum required by state and local building codes.

In August 2020, the ICC estimated the average per square foot cost for good-quality housing was approximately $118.57 for multifamily housing, $131.24 for single-family homes, and $148.44 for residential care/assisted living facilities. Construction costs for custom homes and units with extra amenities are higher. Construction costs are dependent upon materials used and building height, as well as regulations set by the County’s adopted Zoning Code, Building Code, and Fire Code. For example, according to the ICC, constructing an accessory dwelling unit (ADU) or

converting a garage space for residential use using a Type VB unprotected wood framed housing, which often has exposed wood so there is no fire resistance, would cost about $123.68 per square foot. Although construction costs are a significant portion of the overall development cost, they are consistent throughout the region and, when considering land costs, are not considered a major constraint to housing production in Orange County.

A reduction in the construction costs can be brought about in several ways. One such method is a reduction in amenities and quality of building materials in new homes (still above the minimum acceptability for health, safety, and adequate performance), which may result in lower sales prices. State Housing Law provides that local building departments can authorize the use of materials and construction methods if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the applicable building codes.

Cost and Availability of Financing

The availability of financing affects a person's ability to purchase or improve a home. 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. 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. Lending activity is reviewed to determine if home financing is made available to all residents of a community. Data related to the disposition of loan applications submitted per the 2019 HMDA report from the Consumer Finance Protection Bureau for home purchase, home improvement, and refinancing in the Anaheim-Santa Ana-Irvine Metropolitan Statistical Area (MSA)/Metropolitan Division (MD) is contained below in **Table 3-9**.

Table 3-9
Disposition of Loan Applications by Race/Ethnicity
Anaheim-Santa Ana-Irvine MSA/MD

Applications by Race/Ethnicity	% Approved	% Denied	% Other	Total (Count)
LESS THAN 50% OF MSA/MD MEDIAN				
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
50-79% OF MSA/MD MEDIAN				
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

Table 3-9
Disposition of Loan Applications by Race/Ethnicity
Anaheim-Santa Ana-Irvine MSA/MD

Applications by Race/Ethnicity	% Approved	% Denied	% Other	Total (Count)
Hispanic or Latino	47.6%	27.7%	29.3%	3,245
80-99% OF MSA/MD MEDIAN				
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
100-119% OF MSA/MD MEDIAN				
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
120% OR MORE OF MSA/MD MEDIAN				
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.

Lending practices are another economic factor that may influence access to housing opportunities. **Table 3-9** displays the disposition of loan applications for the Anaheim-Santa Ana-Irvine MSA/MD, per the 2019 Home Mortgage Disclosure Act (HMDA) report. Key findings, as shown in the table, include:

- Very low-income applicants (less than 50% of the MSA/MD median income) are more likely to have a loan application denied. The highest rates of denial were amongst those who identify as American Indian/Alaska Native (52.3%) and Native Hawaiian or Other Pacific Islander (44.2%).
- Above moderate-income applicants (at least 120% of the MSA/MD median income) experienced the highest rates of loan approvals. Within this income category, those who identify as White had the lowest percentage of denied applications (11.3%), while those who identify as Black or African American had the highest percentage of denials (17.3%).

- Across all income categories, applicants who identified as White had the highest rates of loan approvals.
- Overall, applicants who identified as White made the majority of all loan applications, followed by applicants who identified as Asian, then Hispanic, or Latino.

According to the data, above-moderate-income applicants (earning 120% or more of the MSA/MD median income) had the highest rates of loans approved. Of that income category, applicants who reported white had the highest percentage of approval and the number of applications. Very low-income applicants in the less than 50% of the MSA/MD median income categories 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.

4. AFFIRMATIVELY FURTHERING FAIR HOUSING

California Assembly Bill 686 (AB 686) established new requirements for all California jurisdictions to ensure that local laws, programs, and activities affirmatively further 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 April 23, 2020. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the jurisdiction's fair housing enforcement and outreach capacity.
- An analysis of segregation patterns and disparities in access to opportunities.
- An assessment of contributing factors.
- An identification of fair housing goals and actions.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. 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. State law also prohibits discrimination in the development process or in real property transactions, and it is the County's policy to uphold the law in this regard.

On June 23, 2020, the Board of Supervisors approved the FY 2020-24 County of Orange Analysis of Impediments to Fair Housing (Orange County AI). The purpose of this document is to affirmatively further fair housing opportunities, and is required for communities that administer federal programs, such as Community Development Block Grant (CDBG), Emergency Solution Grant (ESG), and HOME Investment Partnership (HOME) grants.

The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with Orange County jurisdictions and with input from a wide range of stakeholders through a community participation process, prepared the Orange County AI. Stakeholders included tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal and social services providers, housing developers, and industry groups. The Lawyers' Committee met with stakeholders throughout the County, organized community meetings, and help focus group meetings with nonprofit organizations and government officials.

As included in the Orange County AI, the federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA), including FEHA Regulations, protects residents from discrimination on the basis of race, color, religion, national origin, sex/gender, handicap/disability, familial status, marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination.

The Orange County AI is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the FHA. The Orange County AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the Orange County AI lays out meaningful strategies that can be implemented to achieve progress towards the County's obligation to affirmatively further fair housing.

In summary, the Orange County AI recognizes that "[w]thin both Orange County and the broader Region, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, with monthly housing costs exceeding 50% of monthly income, than do non-Hispanic White households. In Orange County, Hispanic households are most likely to experience severe housing cost burden; in the Region, it is Black households." In the Orange County AI context, Orange County includes all areas and cities, not just Unincorporated areas.

As required by federal regulations, the Orange County AI draws from various federal, state, and local sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs.

The Orange County AI discusses two main impediments to fair housing: (1) public sector impediments which include housing discrimination, reasonable modifications and accommodations, and zoning regulations, and (2) private sector impediments, which include advertising, hate crimes, and real estate and lending practices. The analysis also examines publicly supported housing in each city as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The Orange County AI identifies contributing factors to fair housing issues and steps to be taken by each jurisdiction to overcome these barriers.

The Orange County AI is part of the basis of the County's Affirmatively Furthering Fair Housing analysis in this Housing Element. As a part of the Housing Element, the County considers protected class (such as race, ethnicity, income, etc.) and opportunity indicators as key factors in fair housing. Federal, state, and local data provide regional context, background information and supportive data which helps the County to understand fair housing issues and to identify key fair

housing factors for Orange County. The sections below use available data to identify key trends and local contributing factors to fair housing.

Fair Housing Outreach and Enforcement Capacity

The County has committed to complying with the following laws related to fair housing:

- **Title VI of the Federal Civil Rights Act of 1964**: provides that no person shall be excluded from participation, denied program benefits, or subject to discrimination based on race, color, and/or national origin under any program or activity receiving Federal financial assistance.
- **Title VIII of the Civil Rights Act of 1968** (The Federal Fair Housing Act): prohibits discrimination in housing on the basis of race, color, religion, sex, age, and/or national origin. This law also requires actions which affirmatively promote fair housing.
- **Section 109 of Title 1 of the Housing and Community Development Act of 1974**: provides that no person shall be excluded from participation (including employment), denied program benefits, or subject to discrimination on the basis of race, color, national origin, or sex under any program or activity funded in whole or in part under Title I of the Act.
- **Unruh Civil Rights Act:** protects residents from discrimination by all business establishments in California, including housing and accommodations.
- **Ralph Civil Rights Act** (California Civil Code Section 51.7): forbids acts of violence or threats of violence on the basis of race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute.
- **Bane Civil Rights Act (California Civil Code Section 52.1):** protects residents from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing.
- **California Civil Code Section 1940.3:** prohibits landlords from questioning potential residents about their immigration or citizenship status.
- **Government Code Sections 11135, 65008, and 65580-65589.8:** prohibit discrimination in programs funded by the State and in any land use decisions. Recent additions related to housing for special needs groups include Housing for persons with disabilities (SB 520); Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2); Housing for extremely low-income households, including single-room occupancy units

(California Assembly Bill 2634, AB 2634); Housing for persons with developmental disabilities (California Senate Bill 812, SB 812).

Outreach

In terms of outreach related to Fair Housing, the Unincorporated areas are served by the Fair Housing Council of Orange County (FHCOC), a private non-profit fair housing group, which is under contract to the County to administer a wide variety of fair housing services to residents of Unincorporated Orange County. FHCOC provides fair housing outreach services which include:

- Serving as a fair housing resource, including implementation of an affirmative fair housing marketing plan, testing, and complaint verification.
- Responding to citizen complaints regarding violation of fair housing laws.
- Providing tenant-landlord counseling.
- Promoting community awareness of tenant-landlord rights and responsibilities.
- Reporting quarterly to the County on complaint processing.
- Providing fair housing education to residents, County staff, community organizations, agencies, and service providers.
- Increasing awareness of affordable housing in high opportunity areas.
- Inhibiting 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 in protected classes, who are disproportionately likely to be lower-income and likely to experience homelessness.
- Expanding access to opportunities for protected classes.

On behalf of the County of Orange for the Unincorporated areas, the FHCOC investigates housing discrimination complaints, assists complainants with referrals to government enforcement agencies and assists in, or becomes a party to, litigation aimed at halting illegal discriminatory housing practices." Since 1965, the FHCOC has worked to eliminate housing discrimination and guarantee the rights of all people to freely choose the housing for which they qualify in the area they desire.

FHCOC provides programs such as fair housing enforcement and education, landlord/tenant counseling, and mediation and homebuyer HUD counseling for the County of Orange. For fiscal

year (FY) 2020-21, the County of Orange allocated $52,000 in CBDG funds to the FHCOC to perform the following outreach and enforcement for residents of the Unincorporated areas:

- Fair Housing Enforcement including the investigation of housing related discrimination complaints, assisting complainants with referrals to government enforcement agencies, and assisting with and/or becoming a party to, litigation aimed at halting illegal discriminatory housing practices.
- Fair Housing Training to residents, County staff, community organizations, agencies, and service providers.
- HUD Counseling to provide information on a wide range of topics including, but not limited to, rental assistance programs, mortgage default/foreclosure prevention, and the home buying process.
- Landlord/Tenant Counseling that provides counseling regarding housing rights, obligations and laws, and answers questions about the rights and obligations of landlords or tenants.

Fair housing services are offered by FHCOC via phone, email, or in-person at the FHCOC office in Santa Ana, CA. FHCOC provides language services to people whose primary language is not English as well as reasonable accommodation services to person with disabilities to ensure that fair housing assistance is accessible to all.

In addition, FHCOC held 32 training sessions for rental property owners/managers and presented 16 fair housing seminars and 70 general fair housing workshops to members of the public.

During 2021-2022, the FHCOC regionally conducted or participated in 67 virtual and 21 in-person education and/or outreach activities, reaching a culturally and ethnically diverse audience, in which they made participants aware of fair housing laws and counseling services (including services to help households improve their readiness for a home purchase). Because of the COVID-19 pandemic-driven need to engage with participants virtually, 52 of the virtual activities were not specific to residents of the Urban County jurisdiction, but they were all available to those residents.

Regionally, about 2,400 people were contacted or served by these activities during 2021-2022. Through its various regional outreach efforts FHCOC distributed over 19,800 information pieces on fair housing, its services, and other housing-related topics, in either English, Spanish or Vietnamese. A significant number of these items were distributed electronically, with the rest mainly distributed via mail or bulk delivery. Additionally, throughout Orange County FHCOC held 12 virtual training sessions for rental property owners/managers. FHCOC presented 2 virtual fair housing seminars for housing providers in cooperation with the Apartment Association of Orange County (AAOC). Nineteen general fair housing workshops intended for

participation by both/either housing consumers and/or providers throughout Orange County were provided. Due to the virtual nature of these workshops none were specific to residents of the Unincorporated areas, but they were largely available to those residents.

During 2021-2022, FHCOC continued efforts to promote housing affordability within Orange County. It provided services and outreach to organizations involved in the creation and preservation of affordable housing. These groups included the Kennedy Commission, Mental Health Association of Orange County, Radiant Health (formerly Aids Services Foundation), Affordable Housing Clearinghouse, Jamboree Housing Corporation, Mercy House, South County Outreach, Families Forward, Orange County Congregations Community Organizations, and Orange County Community Housing Corporation.

The FHCOC produces and provides written fair housing related materials in English, Spanish and Vietnamese to the persons in Orange County. FHCOC also undertakes specific virtual outreach efforts to immigrant populations in low-income neighborhoods. On a regional basis, an estimated 870 limited English proficiency (LEP) households were served during the 12-month program period in 2021-2022, through a combination of telephonic contact and virtual education and outreach activities. FHCOC also continued to implement activities under HUD Fair Housing Initiatives Program grants, for both education and outreach and fair housing enforcement. These program efforts specifically targeted fair housing services to persons with disabilities, minority groups and immigrant communities, especially immigrants with limited English proficiency. Program efforts included a fair housing testing program that sought to involve members of immigrant populations with limited English proficiency, both for purposes of enforcing fair housing laws as testers and as a vehicle to increase outreach to these populations.

Through its status as a HUD-approved Housing Counseling agency, FHCOC also assists individuals, including those with limited English proficiency (LEP), with various housing related problems. During 2021-2022, this included being available to counsel and assist those who had received loans with documents, all prepared in English, which had terms that were different from what they believed or were informed they were obtaining, or of which they had less than a full understanding. Many of the other counseling activities under its HUD-approved Housing Counseling also assisted individuals with LEP.

Fair Housing Enforcement

During the 2015-2019 reporting period, County-wide, the FHCOC staff received 363 allegations of housing discrimination countywide and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. In the Unincorporated areas, this included the successful resolution of the following complaints:

1. Protected Class Disability - Mental

Requesting Assistance for approval of reasonable accommodation to approve emotional support animal. The request was granted with no other issues pending and the case was closed.

2. Protected Class Race – White

3. Protected Class Race – White

4. Protected Class Race - White

These four complaints were filed with HUD. The complainants received a notice to terminate tenancy. This case was then forwarded to DFEH and mediated with a small monetary settlement for each complainant. All notices to terminate tenancy were rescinded and cases were closed.

During 2021-2022, on a regional basis, FHCOC staff performed 176 intakes regarding fair housing issues, which resulted in receipt of 128 allegations of housing discrimination and the opening of 61 case files, where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. FHCOC also counseled or informed another 67 clients regarding fair housing law and/or rights. Thirty intakes and 25 allegations arose from Orange County, resulting in the opening of 11 cases involving housing in Orange County (not Unincorporated areas specifically). On a regional basis, FHCOC also conducted 116 paired telephonic, systemic tests for discriminatory rental housing practices. An additional 8 paired systemic tests of real estate agents and 6 paired systemic pre-application tests of lenders were conducted telephonically. While all such systemic testing would normally be conducted in person, COVID-19 pandemic restrictions necessitated they be conducted via telephone only. Seventeen systemic rental tests involved locations in the Urban County jurisdiction. Furthermore, 20 paired telephonic or relay supported test were conducted regionally to assess discrimination of possible discrimination against housing seekers who are deaf or hard of hearing. FHCOC also conducted 5 assessments of compliance with accessibility requirements for persons with disabilities at covered multifamily properties built within the last two years.

On a regional basis, during 2021-2022, activities provided by FHCOC included assisting 3,168 unduplicated households addressing 9,875 issues, disputes and/or inquires.

During 2021-2022, on a regional basis, 15 inquiries regarding reasonable accommodations and modifications were received by FHCOC that resulted in casework beyond basic counseling. Overall, 10 of the 15 clients requested and received a reasonable accommodation, with 4 still pending and one where the client did not pursue the matter. Of those that are pending, any that are effectively and improperly denied will likely be referred as an administrative complaint filed with the Fair Housing and Equal Opportunity (FHEO) Office of the U.S. Department of Housing and Urban Development. Another 104 households were counseled on issues involving reasonable accommodation of a disability-related need at their housing.

Orange County rentals listed on Craigslist are also monitored by FHCOC for discriminatory content. Any discriminatory advertisements were flagged as prohibited and FHCOC responded to these ads through Craigslist's reply mechanism to inform the poster of possible discriminatory content. In most instances it was not possible to identify the property address and the identity of the individual making the posting. When possible FHCOC also brought these ads to the attention of Craigslist to hasten their removal, although the Craigslist reporting mechanism is no longer simple. When investigation was found to be feasible, the ad was referred to FHCOC's investigators for possible enforcement action. Other on-line rental advertising sites (e.g., OC Register, LA Times, Westside Rentals, Zillow, etc.) were sporadically monitored; however, the lack of an efficient text search function on these sites made monitoring them less practical. Without exception, among the 'apt / housing' Craigslist rental listings, the identified problematic postings indicated restrictions about children under the age of 18 or improper preference for seniors or 'older adults' for housing opportunities that did not appear to qualify as housing for older persons (age 55 and over). Overt racial or national origin discrimination in postings was not observed.

Advertising in the 'rooms / shared' area of Craigslist was observed to have a higher incidence of stated preferences that violated fair housing law. However, due to the practical aspects of resource limitations and case law considerations of shared housing situations, most were not acted upon. With the change in California law effective January 1, 2020, that expanded 'source of income' protections to individuals who use forms of housing rent assistance, such as the Housing Choice Voucher (often called 'Section 8'), FHCOC had previously identified numerous Craigslist postings that contained discriminatory language regarding the use of housing rental assistance. In the 2021-2022 program year, FHCOC did not find any Craigslist postings for Orange County rentals that discriminated against users of a Housing Choice Voucher, even though this continued to be an issue in other parts of Southern California.

FHCOC's website currently has an on-line housing discrimination complaint-reporting tool that generates an email to FHCOC. It is also used for other, non-discrimination, housing-related issues. The County of Orange has a link to the FHCOC website where residents can access this information.

Analysis of Federal, State, and Local Data and Local Knowledge

As a part of the Housing Element, the County considers protected class (such as race, ethnicity, income, etc.) and opportunity indicators as key factors that influence fair housing. Federal, state, and local data provide regional context, background information and supportive data which helps the County to understand fair housing issues and to identify key fair housing factors for Orange County. The section below uses available data to identify key trends and local contributing factors to fair housing.

The historical context for land use practices provides some background for current land use trends in Orange County. Orange County has a history of disenfranchisement beginning with Spanish colonialism and continuing with discriminatory policies and cultural norms blocking black, indigenous, and people of color communities from property ownership. (B*eyond Equity: Seeking Liberation, Autonomy and Justice in Orange County*, ("OC Equity Report 2021-2022") at p.14.) Spanish colonialism marked the first period of transformation of property rights. The network of missions, oppressive labor structures, conversion to Catholicism, Spanish cultural norms transformed indigenous property ownership and existence. (*Ibid*.) In 1821, when Mexico gained independence from Spain, ownership was transferred to Mexico and large Mexican landholders dominated property ownership in the "postcolonial" period from 1821 to 1850. (*Id.* at p. 15)

In the mid to late 1800s, the land that would become Orange County moved into a post-Mexican territory transition, in which wealthy white US settlers quickly dominated land, policy, and industry. In 1848, after California became a state, "[s]ome landowners of Spanish, Mexican, and indigenous descent who did not have paper records of ownership effectively lost their land at this time. In 1868, vast areas on either side of the Santa Ana River were placed on the market, and the towns of Santa Ana, Tustin, Orange, Westminster, and Garden Grove were soon founded. That same year, James Irvine purchased 1/5th of what would be Orange County. Later, in 1889, Assemblyman E.E. Edwards introduced a bill to create the County of Orange, which was officially formed that same year in August." (*Id.* at p. 15.)

In the twentieth century, Orange County has a history of redlining. "Redlining systematically prevented people of color from accessing services such as mortgages, insurance, loans, rental agreements or owning a home and settling in certain neighborhoods. Although such explicit redlining has waned, financial discrimination based on race/ethnicity still occurs, and the effects are lasting. Discrimination in banking still imposes barriers on [black, indigenous and communities of color] preventing true wealth accumulation." (*Id.* at p. 16.)

In the 1943 ruling in *Doss et al. v. Bernal et al.,* white neighbors lost their fight against Mexican and Spanish homeowners in a Fullerton neighborhood, when the court ruled that the deed held by the Bernals, which stated that "no portion of the said property shall at any time be used, leased, owned, or occupied by any Mexicans or persons other than of the Caucasian race," violated the equal protection clause of the 14th Amendment of the United States Constitution as well as the due-process clause of the Fifth Amendment. (*Id.* at p. 16.) Following this success, there have been periods of both oppression and resistance to affordable housing, which continue to some degree in Orange County.

As stated, in Orange County historical land use practices included the use of restrictive covenants in deeds that limited the ownership, lease/rent, etc. on the basis of race, color, age, religion, sex, gender, familial status, marriage status, disability, national origin, etc. As part of

new legislation, the County of Orange is systematically removing such covenants in deeds. Unlawful restrictions in deeds include those restrictions based on age, race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, familial status, marital status, disability, genetic information, national origin, source of income as defined in subdivision (p) of Section 12955, veteran or military status, or ancestry.

Government Code section 12956.2(a) provides that any deed or other recorded instrument that contains unlawfully discriminatory language forbidding or restricting the right of any person to sell, buy, lease, rent, use, or occupy the property on account of any of the characteristics specified above, may be revised to remove such unlawful language. A person who holds an ownership interest in property that believes the property is the subject of an unlawfully restrictive covenant may submit for recordation a Restrictive Covenant Modification document. If the existence of unlawfully restrictive language is confirmed by County Counsel, the modification document is recorded with the unlawful restrictive covenant redacted. In addition, the Orange County Clerk-Recorder in collaboration with County Counsel will identify such deeds and remove unlawful language and record a redacted covenant. See Housing Action Plan Program 8.

For the period between 1889-1981, the County of Orange identified approximately 48,000 records that contain unlawfully discriminatory language. Of those, to date, 13,000 restrictive covenants have been modified by the Clerk-Recorder. The process remains ongoing. Most of the unlawfully discriminatory covenants restrict the sale, use, lease, etc. of properties to white persons. The unlawful restrictions are contained in deeds for properties all over Orange County; however, a concentration of unlawful deed restrictions was found in Santa Ana/Orange/Anaheim between 1889-1926, as this area was the population center for Orange County in 1889 when the County was incorporated.

Integration & Segregation Patterns & Trends

The integration and segregation pattern discussion focuses on people with the following protected characteristics

- Race and Ethnicity
- Disability
- Familial Status
- Income

Race and Ethnicity

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%, indicating complete integration, to 100%, 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. 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 4-1 shows the dissimilarity between each of the identified race and ethnic groups and in Santa Ana-Anaheim-Irvine, CA Metropolitan Division's population. The higher scores indicate that the two groups tend to live in different tracts. The White population within Orange County makes up most of the County's population with approximately 61% identifying as White alone (non-Hispanic or Latino) according to 2019 American Community Survey (ACS) 5-Year estimates.

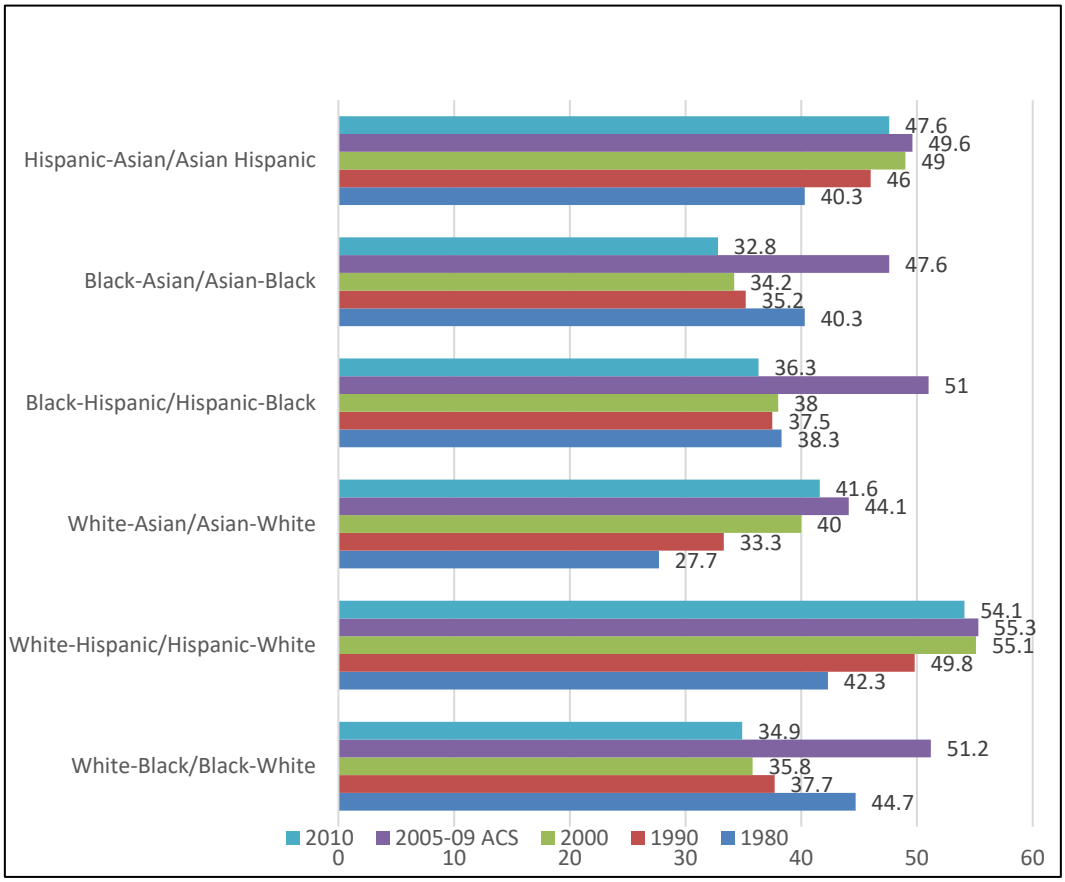
Those who identify as Hispanic, and White were the most likely to live in different tracts. In 1990, White-Hispanic dissimilarity was 42.3 and increased to 54.1 in 2010 both considered a moderate level of segregation. While those who identify as Black and Asian were less likely to live in different tracts. In 1990 White-Asian dissimilarity was 40.3 which was considered a moderate level of segregation while in 2010 the dissimilarity decreased by 7.5 and is considered to be fairly low.

Similarly, to the Santa Ana-Anaheim-Irvine, CA Metropolitan Statistical Area, the San Diego-Carlsbad-San Marcos, CA Metropolitan Statistical Area the population who identified as Hispanic and White were the most likely to live in different tracts. In 1990 White-Hispanic dissimilarity was 41.8 and increased to 49.6 in 2010 both considered a moderate level of segregation. The San Diego-Carlsbad-San Marcos, CA Metropolitan Statistical Area's population who identified as Black and Hispanic were less likely to live in different tracts. In 1990 Black-Hispanic dissimilarity was 49.6 and decreased to 36.7 in 2010 both considered a moderate level of segregation.

The California Department of Housing and Community Development (HCD) considers dissimilarity index scores above 30 as moderate segregation and scores above 60 high segregations. In 2020, as shown by **Figure 4-1**, there were no areas of segregation in the Metropolitan area. While the County has no racial or ethnic populations with a dissimilarity index above 60, all populations aside from those identifying as two or more races have a score

above 30. This means almost all groups experience moderate segregation from the White population. While segregation may be a result of ethnic enclaves or persons of similar cultures living nearby, there is often increased likelihood that segregated areas have fewer access to essential resources. As part of the County's efforts to further fair housing, the County will consider increased targeted outreach to the County's minority residents.

Figure 4-1
Dissimilarity Index with White Population in
Anaheim - Santa Ana- Irvine, CA Metropolitan Division



Source: Brown University, Spatial Structures in the Social Sciences

Table 4-1
Dissimilarity Index Values by Race and Ethnicity for Orange County

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current (2020)
Non-White/White	30.38	34.71	33.58	44.71
Black/White	32.60	33.63	32.27	46.98
Hispanic/White	36.13	41.08	38.18	52.82
Asian or Pacific Islander/White	32.58	34.31	34.82	43.19
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020				

As shown in **Table 4-1** above, overall, Orange County experiences moderate levels of segregation, with significant variances in some individual jurisdictions. The current (2020) Non-White/White value is 44.71, Black/White 46.98, Hispanic/White 52.82, and Asian or Pacific Islander/White 43.19. These values have all increased since 2010, though values had remained consistent from 2000 and 2010. Jurisdictional values tend to indicate low levels of segregation in comparison to Orange County as a whole, but this is due to the spatial distribution of populations across different jurisdictions rather than within different jurisdictions. Areas in central Orange County have the highest Dissimilarity Index values for their populations. Cities of Orange, Santa Ana, and Tustin are particularly affected.

In addition to the Dissimilarity Index, social scientists also use the Isolation and Exposure Indices to measure segregation.

Table 4-2
Isolation Index Values by Race and Ethnicity, Orange County

Isolation Index	Current (2020)
White/White	55.16
Black/Black	3.32
Hispanic/Hispanic	52.81
Asian/Asian	31.84
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020	

These indices, when taken together, capture the neighborhood isolation values for different populations vary widely across the county and individual jurisdictions. Values for White residents are generally higher than for other residents, likely due to the larger number of White residents overall. In Orange County, White residents have an Isolation Index value of 55.16, Black residents 3.32, Hispanic residents 52.81, and Asian residents 31.84. Values for the county are sometimes higher than values in individual jurisdictions for White, Hispanic, and Asian residents, again likely due to higher segregation across jurisdictions rather than within them. Isolation values have generally decreased for White residents over time, increased for Hispanic

and Asian residents, and remained low for Black residents. Hispanic residents have experienced the highest Isolation Index value change over the last few decades. This is partly due to the increasing size of the population in the county.

Contributing factors to segregation include:

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific, neighborhoods, including services and amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Lack of public investment in specific, neighborhoods, including services and amenities[18].

Disability

Persons with disabilities also experience housing access disparities. As shown by **Table 4-5**, nearly 8.5% of Orange County residents have a physical or developmental disability, with a slightly lower percentage, 7.8% in Unincorporated areas. Both of these percentages are lower than the State as a whole. Persons with disabilities may require different features in a home to make housing more accessible, this includes, but is not limited to, ramps rather than stairs, lower and within-reach countertops, and other specific design features. Overall, Orange County, as a whole, has lower percentages of persons with disabilities compared to the State. Persons with ambulatory difficulties (a physical and permanent disability to such a degree that the person is

[18] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

unable to move from place to place without the aid of a wheelchair) and independent living difficulties represented the largest percentages of persons with disabilities in Orange County; this is the same for California as a whole.

Table 4-3
Population by Disability Type

Disability*	Unincorporated Areas	Orange County	California
Hearing Difficulty	2.5%	2.5%	2.9%
Vision Difficulty	1.5%	1.5%	2%
Cognitive Difficulty	2.5%	3.4%	4.3%
Ambulatory Difficulty	3.5%	4.5%	5.8%
Self-Care Difficulty	1.3%	2.2%	2.6%
Independent Living Difficulty	3.0%	4.3%	5.5%
Total with a Disability	**7.8%**	**8.5%**	**10.6%**

**Total of noninstitutionalized population with at least one disability.*
Source: American Community Survey, 5-Year Estimates, 2019

Table 4-4
Persons with At Least One Type of Disability
Unincorporated Areas

Unincorporated CDP or Area	Total Persons	Persons with a Disability	% of Persons with a Disability	No. of Land Inventory Sites (Parcels)
Coto de Caza CDP	15,509	657	4.2%	0
El Modena Area	12,214	1,140	9.3%	181
Ladera Ranch CDP	24,913	1,532	6.1%	0
Las Flores CDP	5,089	235	4.6%	0
Midway City CDP	8,671	1,609	18.6%	35
Modjeska Canyon CDP	834	44	5.3%	0
North Tustin CDP	25,078	2,284	9.1%	2
Orange-Olive Area	14,018	1,115	8.0%	58
Rancho Mission Viejo CDP	7,816	385	4.9%	14
Rossmoor CDP	11,923	980	8.2%	6
Silverado CDP	740	96	13.0%	0
Stanton Area	6,347	719	11.3%	2
Trabuco Canyon CDP	1,223	239	19.5%	0
West Anaheim Area	16,512	1,616	10.0%	27
Williams Canyon CDP	108	17	15.7%	0

Source: American Community Survey 5-Year Estimates 2020
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

The Unincorporated County areas can also be analyzed at the tract-level. For the purposes of this analysis, the Unincorporated County areas have been divided into three sections, North, Central, and South County. North Orange County is generally the area north of California Highway 22, north of the cities of Garden Grove and Santa Ana, and west of Highway 241. Central Orange County encompasses the area south of California Highway 22 and is bound by Highway 241 to the east and extends to include the City of Newport Beach. The data presented for the Unincorporated County subareas is based on tracts in the Unincorporated County. It is relevant to note that some tracts may encompass the Unincorporated County as well as part of an incorporated City, therefore the data is not a perfect representation of the Unincorporated County alone. However, this data serves to present general trends in the Unincorporated County and ACS data itself is only an estimate. **Table 4-5** below shows populations of persons with disabilities in these subareas based on tract-level data.

According to the 2022 ACS (5-year estimates), 8.1% of the Central Orange County population experiences a disability, 9.7% in North Orange County, and 6.9% in South Orange County. In the Unincorporated County as a whole (all three Unincorporated subareas), 8.1% of the population experiences a disability. Over the past ten years, the population of persons with disabilities has increased in all Unincorporated subareas (Central, North, and South) and the Unincorporated area as a whole. According to the 2012 ACS (5-year estimates), only 7.2% of persons in Central Orange County, 8% in North Orange County, and 4.9% in South Orange County experienced a disability. Throughout the Unincorporated County areas, based on tract-level data, only 6.7% of persons experienced a disability in 2012 compared to 8.1% in 2022. Populations of persons with disabilities tend to correlate with elderly populations as elderly persons are more likely to experience disabilities compared to younger age groups. According to the 2022 ACS, 15.4% of the population is 65 or older Countywide compared to only 11.7% in 2012. The

As shown in **Table 4-5** below, ambulatory difficulties are the most common disability type in all three County subareas. In the Central County area, the non-Hispanic White population has the largest disability rate (9.4%) while the Native Hawaiian and other Pacific Islander populations have the highest disability rates in North and South Orange County (14.9% and 19.6%, respectively). Elderly populations are more likely to experience disabilities. Consistent with this trend, 38.8% of persons aged 75 and older in Central Orange County, 46.7% in North Orange County, and 41.2% in South Orange County experience one or more disabilities. As shown in **Figure 4-5**, there tends to be larger elderly populations in coastal areas.

Table 4-5
Persons with Disabilities by Subpopulation and Unincorporated Areas

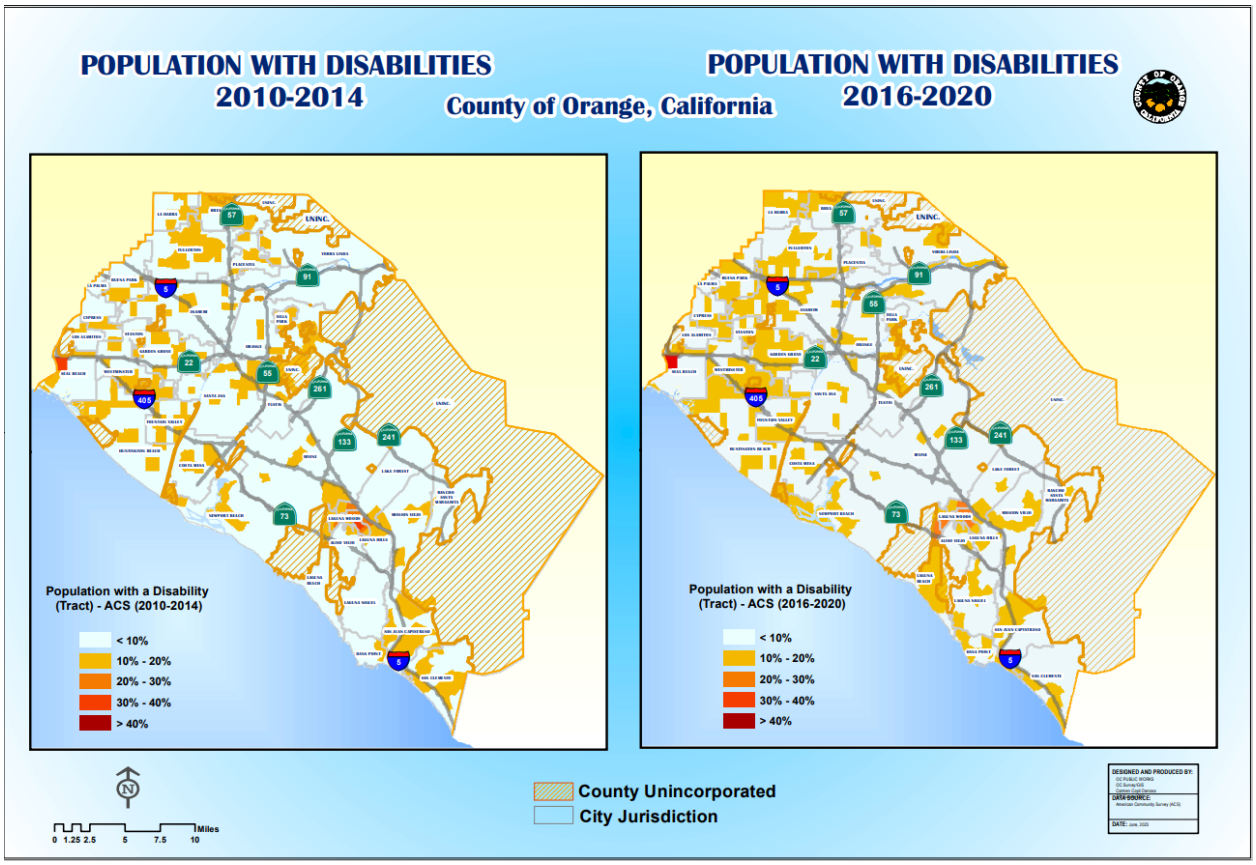
Subpopulation	Central OC	North OC	South OC	Unincorporated Areas
Persons with Disabilities by Type (of total area/subarea population)				
Hearing difficulty	2.2%	2.8%	2.2%	2.4%
Cognitive difficulty	2.8%	3.6%	2.3%	2.9%
Vision difficulty	1.3%	1.6%	1.1%	1.3%
Ambulatory difficulty	3.6%	4.6%	2.9%	3.6%
Self-care difficulty	1.8%	2.4%	1.4%	1.8%
Independent living difficulty	3.0%	3.8%	2.0%	2.9%
Persons with Disabilities by Race/Ethnicity (of total racial/ethnic group)				
Black/African American	6.5%	11.2%	4.8%	7.3%
American Indian and Alaska Native	8.5%	7.3%	6.9%	7.5%
Asian	9.0%	7.8%	4.7%	6.9%
Native Hawaiian and Other Pacific Islander	4.4%	14.9%	19.6%	13.4%
Some other race	5.0%	10.2%	6.4%	7.5%
Two or more races	7.3%	8.9%	5.9%	7.4%
Non-Hispanic White	9.4%	12.6%	7.9%	9.4%
Hispanic/Latino	5.5%	8.2%	6.2%	6.9%
Persons with Disabilities by Age (of total age group)				
<5 years	2.2%	2.0%	0.4%	1.3%
5-17 years	3.7%	4.7%	3.6%	4.0%
18-34 years	5.0%	4.7%	2.9%	4.2%
35-64 years	6.0%	7.3%	5.3%	6.1%
65-74 years	13.1%	19.4%	13.1%	15.1%
75+ years	38.8%	46.7%	41.2%	42.4%
Total population of persons with disabilities	***8.1%***	***9.7%***	***6.9%***	***8.1%***
Total civilian noninstitutionalized population	**208,808**	**242,613**	**294,904**	**746,325**

Source: American Community Survey, 5-Year Estimates, 2022
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

Additionally, **Figure 4-2** below displays the population in all of Orange County with a disability by census tract. The data shows that in 2010 a majority of the census tracts had less than 10% of

the population who reported a disability, with pockets of 10 to 20% in the northwest region of Orange County. Comparatively, the data displaying 2015-2019 data shows that most census tracts had increased populations who reported a disability, approximately 10 to 20%, and in some cases, 20 to 30%. Additionally, the maps show a pocket of census tracts in the Lake Forest area with a higher percentage of persons with disabilities. In 2010-2014 the data shows a mix of 20 to 40% of the population reporting a disability, whereas in 2015-2019 that area decreased in size but increased in the percentage of population reporting a disability.

Figure 4-2
Persons with Disabilities in Orange County, 2010-2014 (Left) and 2015-2019 (Right)



Source: Esri, HERE, Garmin, USGS, NPS|Placeworks 2021, ESRI, U.S. Census|Placeworks 2021, TCAC 2020|Placeworks 2021, CA HCD

Both maps demonstrate that the highest concentrations of populations reporting a disability have consistently remained within incorporated cities over the course of the past 20+ years, with only small pockets of the Unincorporated County area reporting populations with a disability. The pockets of the Unincorporated County area did not migrate or shift between 2010 and 2020. However, those portions of the Unincorporated County area shrunk between 2010 and 2020 and continue to represent only a small fraction of the population in Orange County as a whole reporting a disability.

Consistent with this, the 2016-2020 data presented in **Figure 4-2** shows that the areas with the highest concentration of populations reporting a disability are present outside of the Unincorporated area. Within the Unincorporated County area, the Unincorporated islands of Midway City, El Modena, West Anaheim, Stanton, Orange-Olive, North Tustin, and the Unincorporated areas along the outskirts of the cities of Brea and Yorba Linda appear to have the highest concentration of populations reporting a disability. All of these areas correspond to relatively high opportunity areas and high resource areas, and while they have some overlap with other protected characteristics, the overlap is not concentrated or consistent with any specific protected characteristics. This indicates that there has been little movement over the past decade in terms of where populations reporting a disability reside within the Unincorporated County area, and that populations reporting a disability within the Unincorporated County area have generally high access to resources and good access to opportunities, on par with other populations within the Unincorporated County area.

In Orange County, there are 104 Other Multifamily Housing and 4,090 Project-Based Section 8 units that are subject to Section 504 of the Rehabilitation Act, which requires that federally financed housing developments have 5% of total units be accessible to individuals with mobility disabilities and 2% be accessible to individuals with sensory disabilities. 81 people with disabilities reside in Multifamily Housing, and 549 reside in Project-Based Section 8 units. At this time, it is unknown how many accessible units are in Project Based Section 8 units. There 5,045 people with disabilities that reside in units assisted with Housing Choice Vouchers in Orange County. According to the California Tax Credit Allocation Committee (CTCAC)'s Low Income Housing Tax Credit (LIHTC) database, there are 158 LIHTC developments currently in service. In these 158 developments, there are 16,201 affordable units. These developments were put into service after 1991, meaning that they have all been built according to 1991 Fair Housing Act accessibility requirements.[19]

Based on available data, the supply of affordable, accessible units in Orange County as a whole is insufficient to meet the need. In the County, some 81,297 residents have hearing difficulty, 51,196 residents have vision difficulty, and 133,232 residents have ambulatory difficulty, potentially requiring the use of accessible units. Meanwhile, the data indicates there may be roughly 75,660 units that have been produced subject to the Fair Housing Act's design and construction standards and approximately 4,000 units within developments that must include accessible units subject to Section 504. There is, without question, some overlap between these

[19] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

two categories, some of these units are likely non-compliant, and some accessible units are occupied by individuals who do not have disabilities. [20]

As noted in Section 2, **Table 4-4,** and above, however, the Unincorporated County areas that this Housing Element addresses, do not host a large population of disabled persons. The units available currently likely address the needs of the smaller disabled population in the Unincorporated County areas and thus, this need is lower priority than the need for affordable, elderly, and multifamily housing.

Familial Status

Table 4-6 displays the familial status, or household type, for Unincorporated County areas, Orange County, and the State. Amongst the three jurisdictions, households categorized as "family" made up the largest percent of households overall. Unincorporated County areas and Orange County have a higher percentage of family households than the state. Family households with children represent the same percentage for Orange County as the State and represent larger percentages than non-family households.

Table 4-6
Population by Familial Status

Familial Status	Unincorporated CDPs	Orange County	California
Family Households	83.4%	71.7%	68.7%
Married-Couple Family Households	70.7%	54.9%	49.8%
With Related Children Under 18	35.6%	34.1%	34%
Female Households, No Spouse	9.4%	11.5%	13%
Non-Family Households	16.6%	28.3%	31.3%
Households with One or More People 60 Years+	39.8%	39.9%	39.1%
Total Households	**29,938**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 4-7 below displays income, household type, and number of proposed housing sites for each Unincorporated County area. The Unincorporated County areas with the lowest incomes have the highest percentages of single parent households and the areas with the highest incomes also have the highest percentages of married family households.

[20] *Id.*

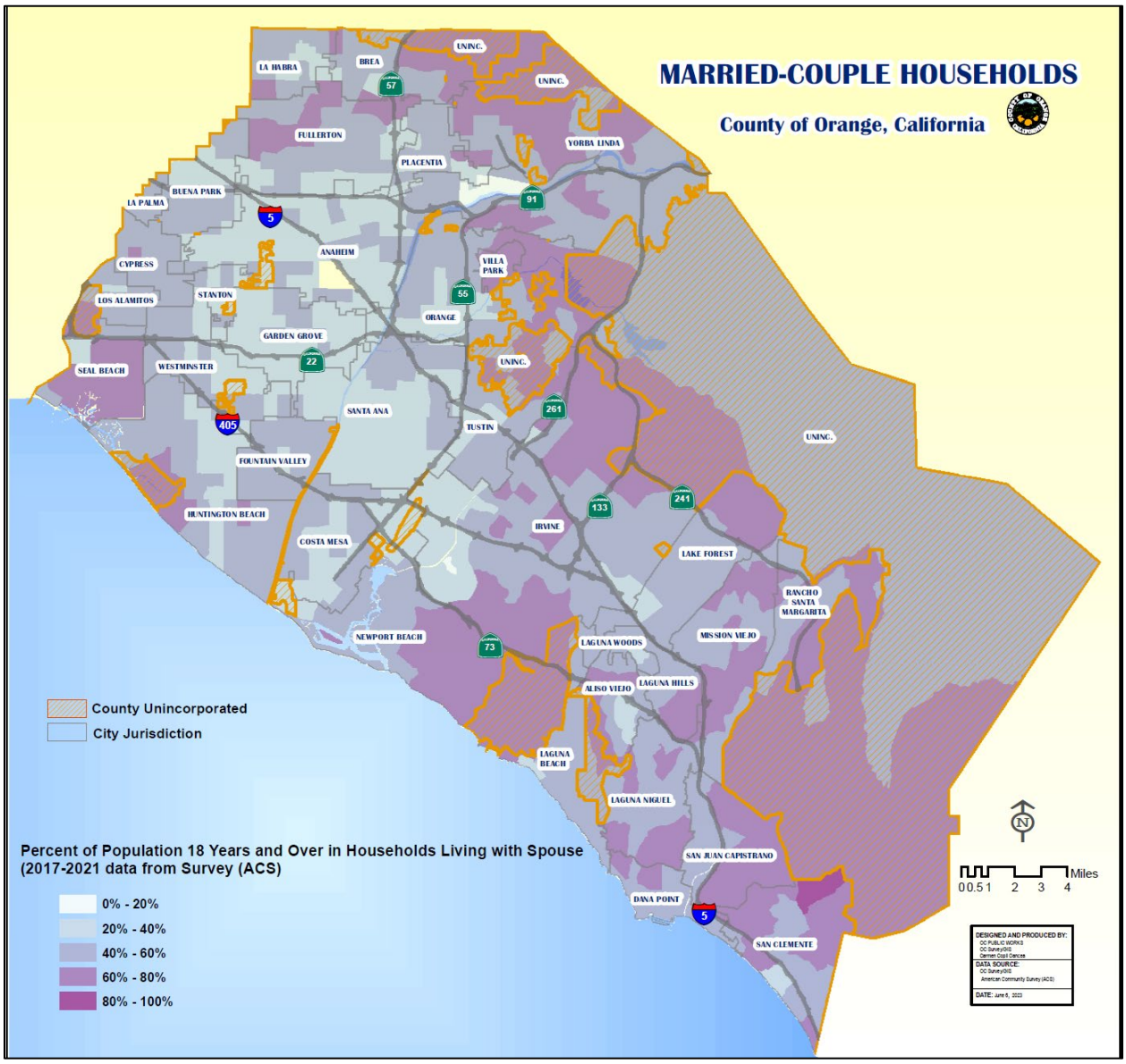
Table 4-7
Population by Familial Status of Unincorporated Areas

Unincorporated CDP or Area	% of Area Median Income (AMI)	Family Status			No. of Land Inventory Sites (Parcels)
		% Married Couple	% Female Head of Household	% Male Head of Household	
Coto de Caza CDP	210	81	7.8	5.5	0
El Modena Area	110	59	21	11.6	181
Ladera Ranch CDP	169	65	21	9.2	0
Las Flores CDP	147	61	18.7	6.3	0
Midway City CDP	48	46	28.6	23.8	35
Modjeska CDP	103	78	13.6	3.8	0
North Tustin CDP	157	70	17	7.9	2
Orange-Olive Area	129	61	10	6	58
Rancho Mission Viejo CDP	152	66	28	4.1	14
Rossmoor CDP	153	67	19.3	10.1	6
Silverado CDP	90	34	30	26	0
Stanton Area	70	31	31	12.6	2
Trabuco Canyon CDP	164	70	10	10.3	0
West Anaheim Area	72	47	28.5	14.3	27
Williams Canyon CDP	N/A	100	0	0	0

Source: American Community Survey, 5-Year Estimates, 2021.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

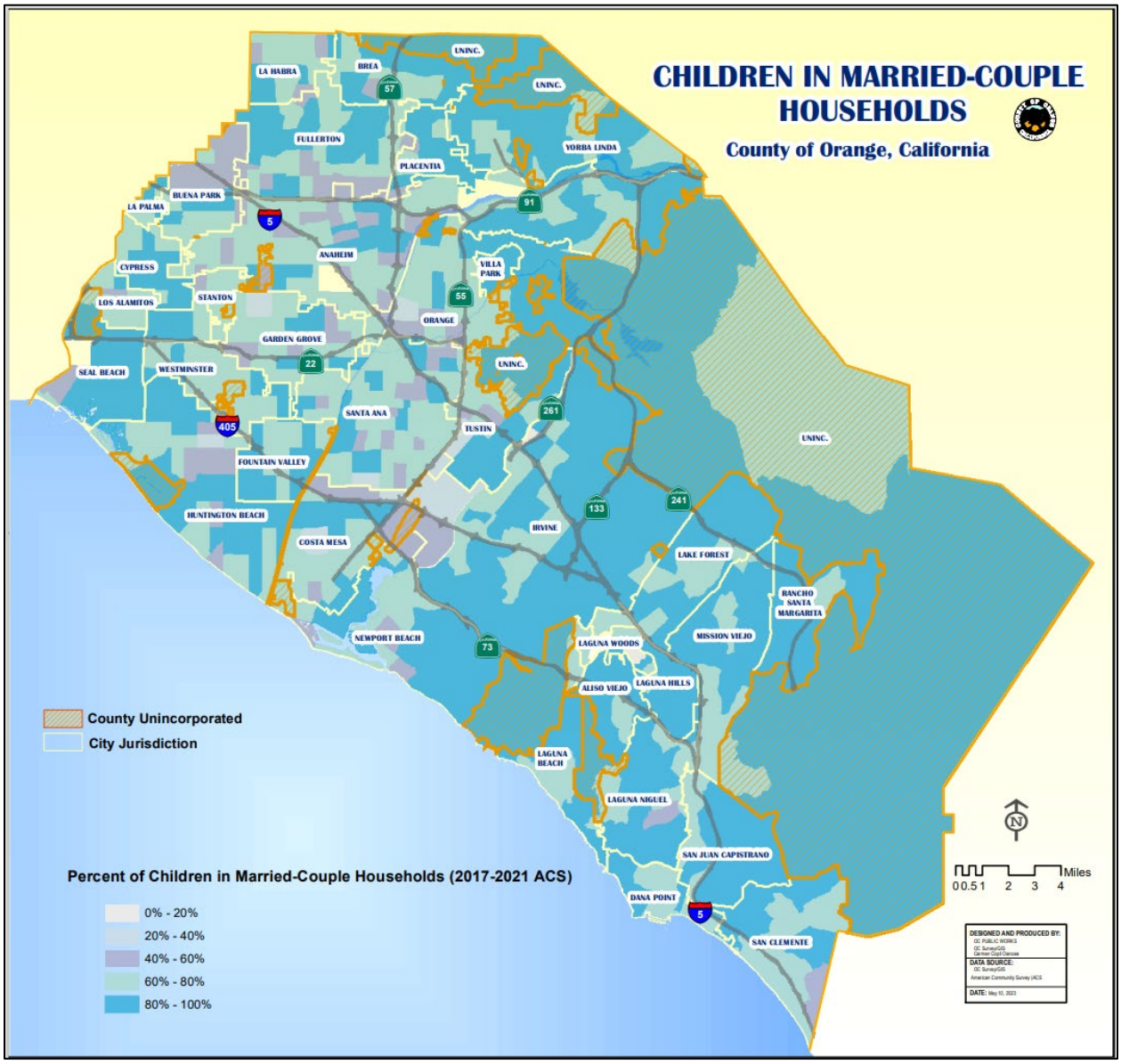
Figures 4-3 through **4-5** below show household type and familial status geographically across Orange County, including the Unincorporated County areas. As the maps demonstrate, the coastal, south Orange County and inland/foothills areas have the highest concentrations of married households and married households with children. The central areas of the County have greater percentages of unmarried and/or female only headed households.

Figure 4-3
Married-Couple Households



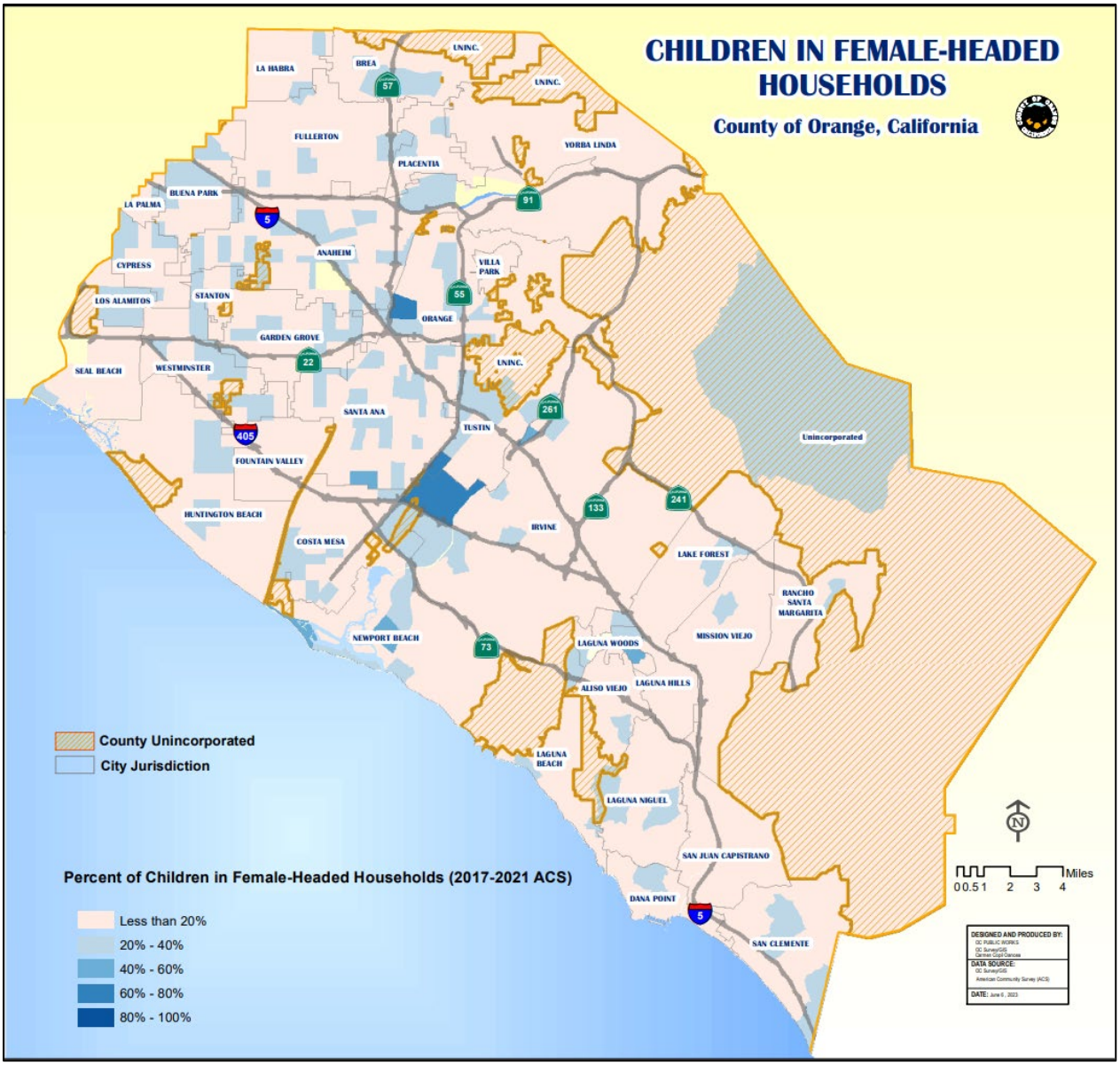
Source: HCD AFFH Data Viewer, 2022

Figure 4-4
Children in Married-Couple Households



Source: HCD AFFH Data Viewer, 2022.

Figure 4-5
Children in Female-Headed Households



Source: HCD AFFH Data Viewer, 2022

As discussed in the *Populations of Persons with Disabilities* subsection, for the purposes of this analysis, the Unincorporated County areas have been split into subareas: Central, North, and South Orange County. The following analysis is based on Unincorporated County area tract-level data using the 2022 and 2012 ACS (5-year estimates).

As shown in **Table 4-8**, approximately 30.6% of households in the Unincorporated County areas consist of both the householder and their children. The South County area has the largest proportion of households with children (32.9%) compared to the North County (31.5%) and Central County (26.4%). Over the last ten years, the proportion of households with children has decreased in the Unincorporated County areas, including in all subareas. According to the 2012 ACS, 35.8% of households in the Unincorporated County areas had children of the householder, including 29.6% in Unincorporated Central Orange County, 36% in Unincorporated North Orange County, and 42% in Unincorporated South Orange County.

Married couple families represent more than half of households in all Unincorporated County subareas. The North County subarea has a larger proportion of single-parent female-headed households (4.9%) compared to the Central County subarea (3.4%) and South County subarea (3.7%). Approximately 2% of households in Central and North County are single-parent male-headed households compared to 1.4% of households in the South County.

Table 4-8
Households by Familial Status/Children of Unincorporated Subareas

	Central OC	North OC	South OC	Unincorporated Areas
Married-couple family	51.7%	58.4%	61.8%	57.9%
With children	20.9%	24.4%	27.8%	24.8%
Single male-headed	5.8%	6.0%	3.5%	4.9%
With children	2.2%	2.2%	1.4%	1.9%
Single female-headed	9.5%	12.2%	7.9%	9.6%
With children	3.4%	4.9%	3.7%	4.0%
Nonfamily household	32.9%	23.4%	26.9%	27.6%
Total households with children	***26.4%***	***31.5%***	***32.9%***	***30.6%***
Total households	**74,734**	**76,535**	**108,095**	**259,364**

Source: American Community Survey, 5-Year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Income Status

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51% of the population is LMI (based on HUD income definition of up to 80% of the Area Median Income).

The average income amongst census tracts that include Unincorporated County areas is $173,274. The Unincorporated South Orange County area has the highest average income of $207,678 compared to Central ($162,640) and North Orange County ($145,589). The median income for Unincorporated County areas is $134,282. According to the 2022 ACS, Orange County as a whole (incorporated and Unincorporated County areas) has a median household income of $109,361 and an average household income of $147,182. Over the last decade, the household incomes in the Unincorporated County areas have increased. According to 2012 ACS estimates, the average income in Unincorporated Central County was $112,057, $101,759 in North County, and $143,173 in South County. The average household income in the Unincorporated County areas as a whole was $118,354 and the median household income was $83,850.

Compared to other counties in the region, the median and average household incomes in Orange County, including in the Unincorporated County areas, are higher than in Los Angeles County ($83,411 and $119,756, respectively), Riverside County ($84,505 and $110,021, respectively), San Bernardino County ($77,423 and $100,078, respectively), and San Diego County ($96,974 and $129,234, respectively).

According to 2023 HCD State Income Limits, the Area Median Income (AMI) for Orange County is $127,800 for a four-person household.[21] State income limits for a four-person household in Orange County are as follows:

- $114,800 or less – Lower-Income
- $114,800 - $127,800 – Median
- $127,800 - $153,350 – Moderate-Income
- >$153,350 – Above-Moderate-Income

Only 42.3% of households in the Unincorporated Central area, 45.3% in the Unincorporated North area, and 32% in the Unincorporated South area earn less than $100,000. A large proportion of households in all subareas earn more than $150,000 and would be considered

[21] California Department of Housing and Community Development (HCD). 2023. 2023 State Income Limits. https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2023.pdf.

above-moderate-income households, including 37.7% in the Central subarea, 36.9% in the North subarea, and 50.6% in the South subarea.

As discussed above, the North subarea, with the largest proportion of households earning less than $100,000, also has the largest proportion of single-parent female-headed households and population of persons with disabilities compared to the Central and South Unincorporated County areas.

Table 4-9
Household Income of Unincorporated Subareas

Household Income	Central OC	North OC	South OC	Unincorporated Areas
<$10,000	4.0%	3.6%	3.5%	3.7%
$10,000 - $14,999	1.9%	2.6%	1.3%	1.9%
$15,000 - $24,999	3.5%	3.6%	2.8%	3.3%
$25,000 - $34,999	4.0%	3.9%	3.2%	3.6%
$35,000 - $49,999	6.5%	7.2%	4.1%	5.7%
$50,000 - $74,999	11.2%	11.9%	8.5%	10.3%
$75,000 - $99,999	11.1%	12.6%	8.5%	10.5%
$100,000 - $149,999	20.0%	17.7%	17.4%	18.3%
$150,000 - $199,999	12.3%	14.9%	13.5%	13.5%
$200,000+	25.4%	22.0%	37.1%	29.3%
Median income	--	--	--	$134,282
Average income[1]	$162,640	$145,589	$207,678	$173,274
Total households	**74,734**	**76,535**	**108,095**	**259,364**

Source: American Community Survey, 5-Year Estimates, 2022.
Note (1): The average income was calculated based on averages of all tracts in each subarea that contain Unincorporated County areas.

Overpayment

According to State housing policy, overpaying occurs when housing costs exceed 30% of gross household income. **Table 4-10** displays recent estimates of households in Unincorporated CDPs that are overpaying for housing. According to SCAG, and as shown in **Table 4-11**, over 50% of all renter households in the Unincorporated County areas were overpaying for housing. **Table 4-12** displays mortgage-holding households (owners) in the Unincorporated County areas overpaying for housing. Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For

lower-income renters, severe cost burden can require families to double up resulting in overcrowding and related problems.

Table 4-10
Household Cost Burden – Unincorporated CDPs and Orange County

Income	Orange County		Unincorporated CDPs	
	Household Cost Burden		Household Cost Burden	
	>30%	>50%	>30%	>50%
Household Income less-than or = 30% MFI	135,715	114,560	1,960	1,685
Household Income >30% to less-than or = 50% MFI	101,280	48,175	1,590	1,125
Household Income >50% to less-than or = 80% MFI	97,005	22,425	2,350	1,030
Household Income >80% to less-than or = 100% MFI	33,515	4,100	1,160	210
Household Income >100% MFI	40,440	3,670	2,600	400
Total Households	**407,955**	**192,930**	**9,660**	**4,454**

Source: HUD CHAS, 2019
Note: MFI refers to the HUD Area Median Family 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. MFI 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.
Note: MFI in Orange County in 2019 was $97,900 as determined by HUD
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 4-11
Renter Overpayment by Income Category
Unincorporated Orange County

% of Income Paid for Housing	Renters	
	Households	%
All households	9,354	100.0%
Less than 10%	265	2.83%
10-14.9%	776	8.30%
15-19.9%	686	7.33%
20-24.9%	1,035	11.06%
25-29.9%	1,023	10.94%
30-34.9%	1,029	11.0%
35-35.9%	695	7.43%
40-49.9%	853	9.12%
50% or more	2,328	24.89%
Not computed	664	7.10%
Households overpaying	4,905	52.40%
Source: SCAG Pre-Certified Local Housing Data – August 2020		

Table 4-12
Homeowner Overpayment by Income –
Unincorporated Orange County

% of Income Paid for Housing	Number of Households by Annual Income				
	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 or more
Over 30%	499	635	714	1,834	5,485
20-29%	0	21	64	209	6,904
Under 20%	0	0	15	194	8,192
Source: SCAG Pre-Certified Local Housing Data – August 2020					

As the above tables demonstrate, 1,960 households in Unincorporated Orange County areas making less than 30% of the AMI are having to pay more than 30% of their income to household costs. According to SCAG Pre-Certified Local Housing Data, there are a total of 41,617 households in Unincorporated Orange County. Thus, 4.7% of all households in Unincorporated Orange County areas have to pay more than 30% of their income to household costs. This means that extremely and very low-income households are disproportionately impacted by overpayment in Unincorporated County areas. In addition, 52.44% of renters in Unincorporated County areas

pay 30% or more of their income for rental costs. These numbers demonstrate that more than 50% of renters are overpaying, which again, disproportionately impacts lower-income households. According to SCAG data, 9,167 households or 22% of mortgage holding (homeowner) households in Orange County pay more 30% or more of their income for housing costs. According to SCAG data, 5,485 homeowners, or 22% of all homeowners covered in **Table 4-12**, making $75,000 or more are still paying more than 30% of their income towards housing costs. Approximately 7% of all households in Unincorporated County areas making less than $50,000 per year are paying over 30% of their incomes to housing costs.

According to the most recent *Orange County Analysis Of Impediments To Fair Housing Choice, April 2020* (Orange County AI), "[t]here are 194,569 households in [all of] Orange County experiencing housing cost burden, with monthly housing costs exceeding 30 % of monthly income. 104,196 of these households are families. However, Orange County has only 429 Project-Based Section 8 units and 33 Other Multifamily units with more than one bedroom capable of housing these families. Housing Choice Vouchers are the most utilized form of publicly supported housing for families, with 2,286 multi-bedroom units accessed. Large family households are also disproportionately affected by housing problems as compared with non-family households. Some focus groups have communicated that regulations and cost issues can make Orange County too expensive for families. The high percentage of 0-1- bedroom units in publicly supported housing and the low percentage of households with children in publicly supported housing support this observation."

Based on the data, the households experiencing monthly housing costs exceeding 30% of monthly income in Unincorporated Orange County areas make up only 1% of the households in all of Orange County facing household cost burden. This is not a significant percentage demonstrating that the Unincorporated Orange County areas do not face significant cost burden challenges compared to other jurisdictions in the County.

Table 4-13
Median Household Income in Unincorporated Areas

Unincorporated CDP or Area	Median Household Income	% of County Median Income	No. of Land Inventory Sites (Parcels)
Coto de Caza CDP	$210,990	210%	0
El Modena Area (Approx. Avg. Median)	$110,667	110%	181
Ladera Ranch CDP	$169,706	169%	0
Las Flores CDP	$147,404	147%	0
Midway City CDP	$48,323	48%	35
Modjeska CDP	$103,967	103%	0
North Tustin CDP	$157,487	157%	2
Orange-Olive Area (Approx. Avg. Median)	$129,636	129%	58
Rancho Mission Viejo CDP	$152,989	152%	14
Rossmoor CDP	$153,750	153%	6
Silverado CDP	$90,938	90%	0
Stanton Area (Approx. Avg. Median)	$70,360	70%	2
Trabuco Canyon CDP	$164,417	164%	0
West Anaheim Area (Approx. Avg. Median)	$71,866	72%	27
Williams Canyon CDP	N/A	N/A	0

Source: American Community Survey, 5-Year Estimates, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

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: R/ECAPs must have a non-white population of 50% or more. Regarding the poverty threshold, Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation (June 2020) defines neighborhoods of extreme poverty as census tracts with 40% 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 R/ECAP if it has a poverty rate that exceeds 40% 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. 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 identify and establish themselves in new places. Overall, it is important to study and identify these areas to understand patterns of segregation and poverty in the County.

In 1990, one R/ECAP was present in Orange County, along E. La Palma Ave in Yorba Linda. This R/ECAP had a low population, with 82 total residents. 47.56% of the population was Hispanic, 8.54% was Asian, and the remainder were White. By 2000, the R/ECAP present in Orange County had shifted slightly to the West, in the area between E. Orangethorpe Ave and E. Frontera St. This R/ECAP remained sparsely populated, with 302 residents, 19.21% of which were White, 0.99% were Native American, 4.64% Asian or Pacific Islander, and 75.17% Hispanic. The original R/ECAP had a larger Hispanic population than before, and a shrinking White population. Another R/ECAP appeared in the northernmost portion of the University of California, Irvine campus, likely due to the presence of students. The R/ECAP had 2,672 residents, which were 34.73% White, 1.57% Black, 0.41% Native American, 53.41% Asian or Pacific Islander, and 7.49% Hispanic.[22]

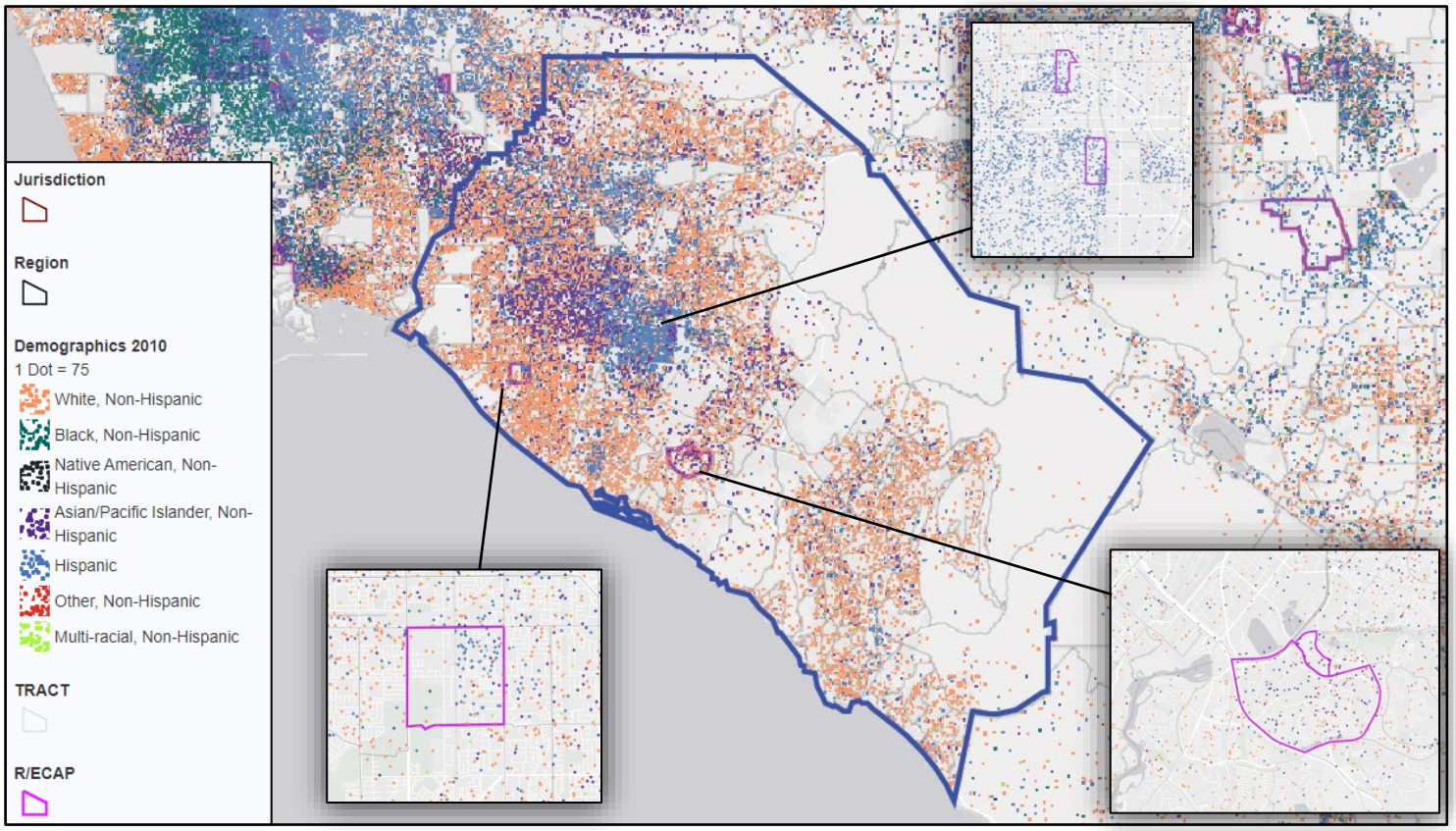
By 2010, the R/ECAP in Santa Ana was no longer present. The high level of fluctuation in this R/ECAP indicates that the area hovers around the 40% poverty threshold to qualify as a R/ECAP. The second R/ECAP, which appeared on the University of California, Irvine campus is again likely caused by the presence of diverse students, though increasing poverty is also likely a factor. All the areas with R/ECAPs in the maps above once again were present in the most current map of R/ECAPs, suggesting that these will be continued areas for concern in the future.

Figure 4-6 below displays the R/ECAP analysis of the Orange County area. The figure shows there are five pockets of racially or ethnically concentrated areas of poverty in the northern and central areas of Orange County; however, none are located within Unincorporated Orange County. There are also R/ECAPs in neighboring communities to the north and to the west. The County is committed to increasing housing mobility throughout Orange County and the region. This Housing Element outlines housing opportunities, affordable housing, and fair housing strategies to increase opportunities to all households.

In comparison to Orange County's 5 R/ECAP areas, San Diego County has 18 R/ECAP areas with the majority located in the south-west region. Additionally, Los Angeles County has 134 R/ECAP areas with the majority located in the south-west portion of the County.

[22] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

Figure 4-6
R/ECAP Areas in Orange County



Source: HUD Affirmitaevly Furthering Fair Housing Data and Mapping Tool, Data Versions: AFFHT0006, July 10, 2014

While the following may be contributing Factors to R/ECAPs, there are no such areas in the Unincorporated areas of Orange County, thus, addressing these areas is not a priority for the County:

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Location and type of affordable housing

- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination

  Source of income discrimination[23]

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.

The ROI: People (**Figure 4-7**) is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

- **Educational 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/Environmental 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.

The ROI: Place (**Figure 4-8**) is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

[23] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

- **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 U.S. citizenship.

As the figures show, the majority of Orange County is classified as high opportunity zones with pockets of low opportunity in the north central area. This indicates generally high levels of relative opportunities that people can achieve as well as high levels of relative opportunities that the County provides. **Table 4-14** below identifies the County's overall opportunity indicators compared to the State. The data shows the following key findings:

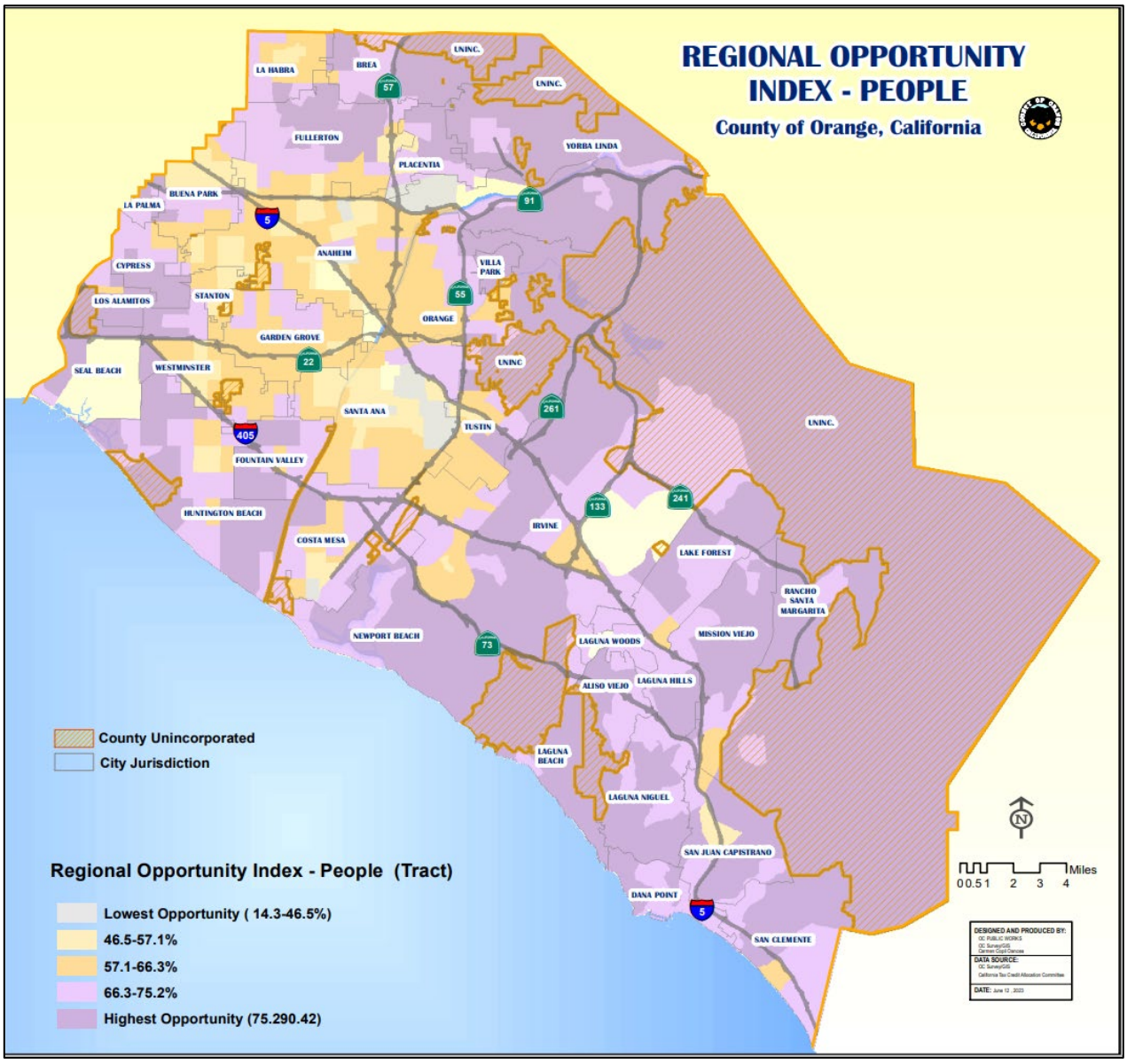
- The County has higher rates of college educated adults, high school graduates, and University of California (UC)/California State University (CSU) eligible students.
- Orange County residents experience higher employment rates and minimum basic income rates than the State. The County has a higher job availability rate and higher job quality.
- Orange County has a higher homeownership rate, but the cost housing affordability rate is lower than the State.
- Commute times are higher in Orange County, but County residents have higher access to vehicles.
- Overall health and environmental opportunities are comparable to the State. However, Orange County has higher access to prenatal care and health care availability.
- Orange County has comparable voting rates as the State, but Orange County residents have lower English-speaking rates and lower citizenship rates.

Table 4-14
Local and State Regional Opportunity Indicators (ROI) for Place and People

ROI Indicator		Orange County	California
Education	**People**		
	College Educated Adults	44%	38%
	Math Proficiency	77%	70%
	English Proficiency	72%	65%
	Elementary Truancy	16%	24%
	Place		
	High School Graduation Rate	92%	83%
	UC/CSU Eligibility	48%	41%
	Teacher Experience	54%	36%
	High School Discipline Rate	4%	6%
Economic	**People**		
	Employment Rate	92%	89%
	Minimum Basic Income	70%	64%
	Place		
	Job Availability	859.93	701.75
	Job Quality	42%	40%
	Job Growth	2%	3%
	Bank Accessibility	0.27	0.24
Housing	**People**		
	Home Ownership	58%	55%
	Housing Cost Burden	52%	52%
	Place		
	Housing Advocacy	89%	91%
	Housing Affordability	0.16	0.19
Mobility	**People**		
	Vehicle Availability	90%	86%
	Commute Time	61%	60%
	Internet Access	4.70	4
Health and Environment	**People**		
	Infant Health	95%	95%
	Birth to Teens	5%	7%
	Years of Life Lost	23.37	29.84
	Place		
	Air Quality	10.44	10.01
	Prenatal Care	90%	83%
	Access to Supermarket	53%	53%
	Health Care Availability	2.28	1.76
Civic Life	**People**		
	Voting Rates	31%	31%
	English Speakers	87%	88%
	Place		
	US Citizenship	81%	83%
	Neighborhood Stability	85%	85%

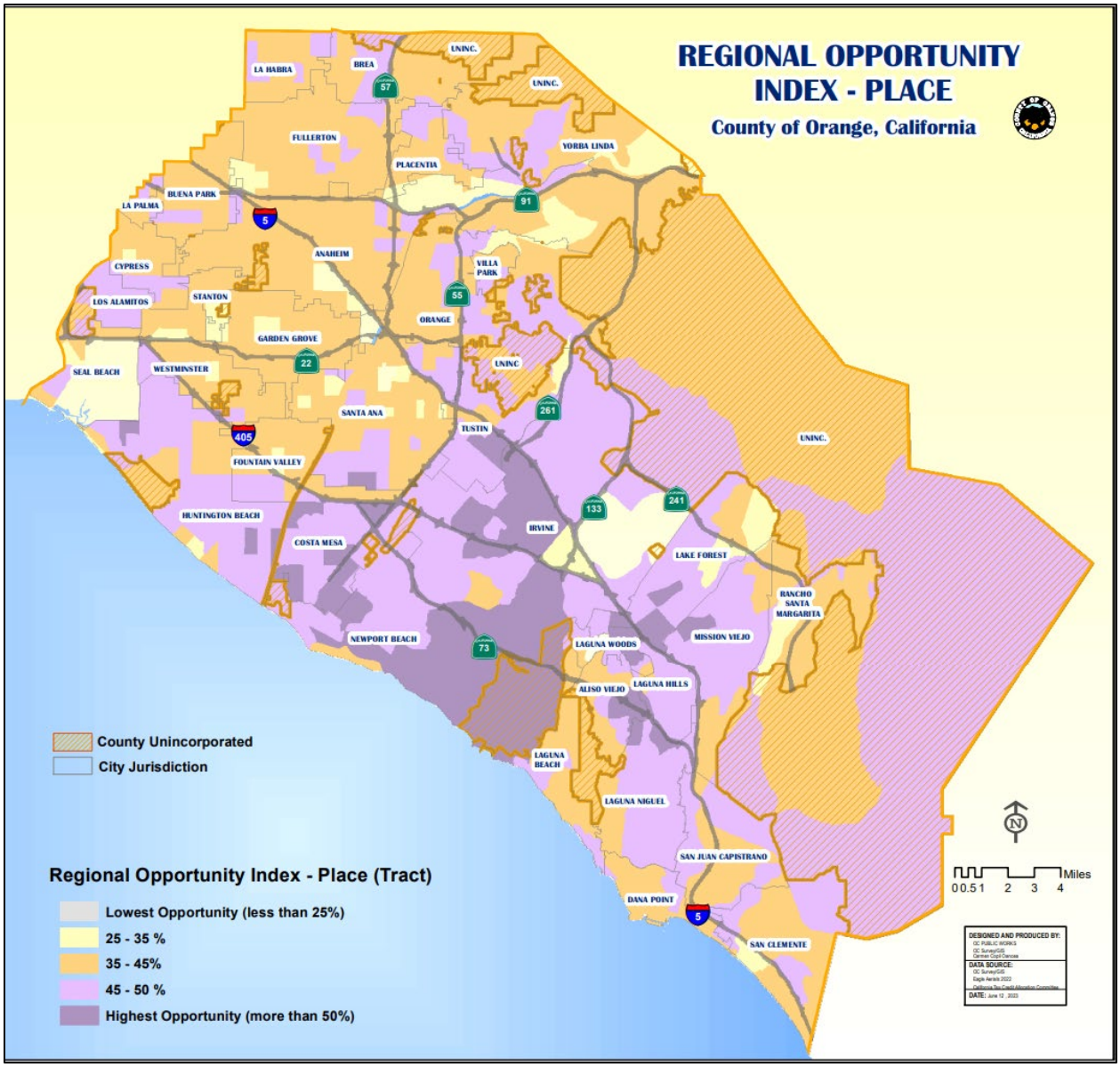
Source: UC Davis Center for Regional Change and Rabobank, 2014.

Figure 4-7
Regional Opportunity Index: People, 2014



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

Figure 4-8
Regional Opportunity Index: Place, 2014



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

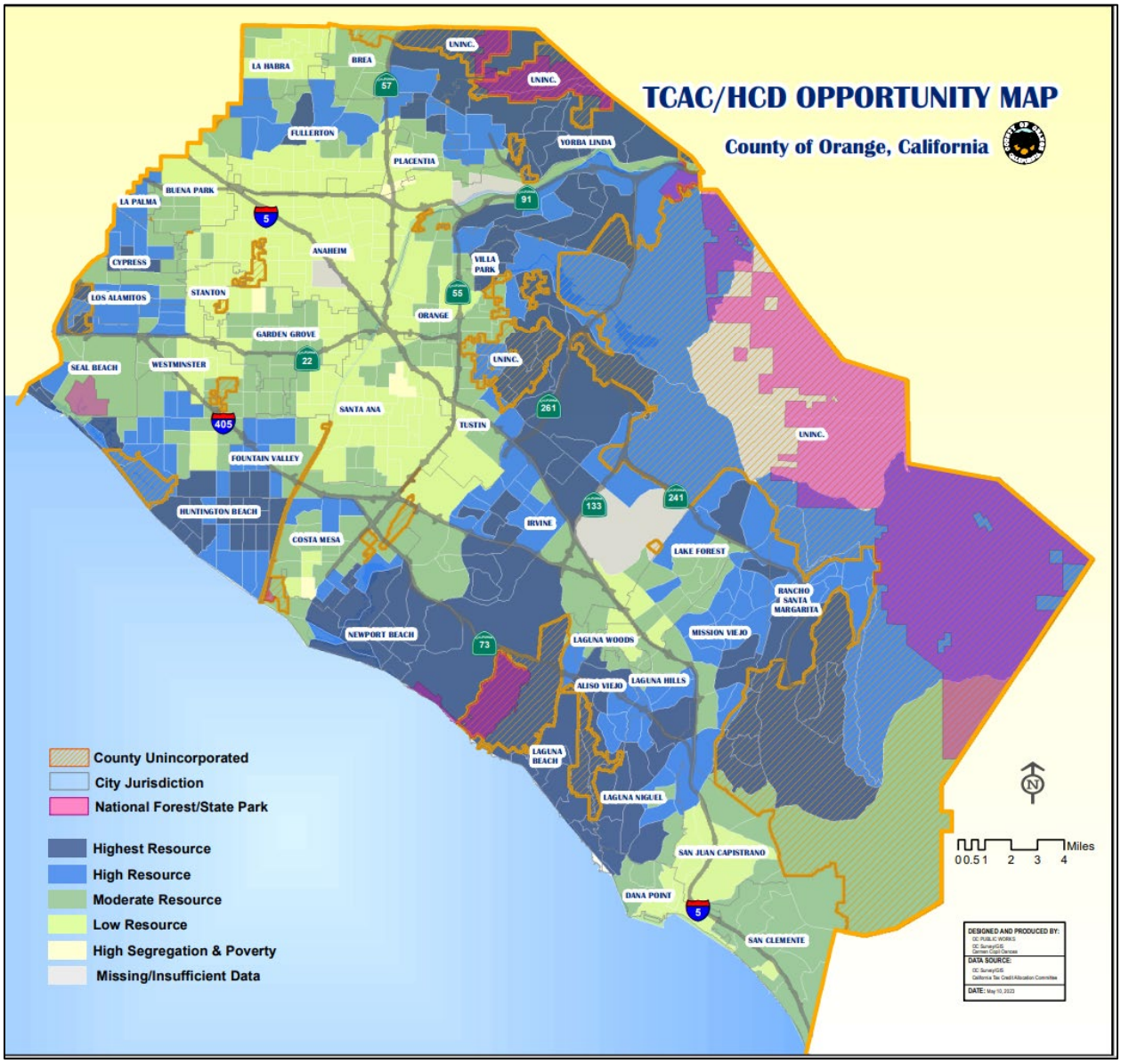
Opportunity Area Maps

HCD together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force (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 20% of the tracts in each region with the highest relative index scores to the "Highest Resource" designation and the next 20% to the "High Resource" designation. Each region then ends up with 40% 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.

As shown in **Figure 4-9** below, Orange County has large pockets of low resource and high segregation and poverty areas surrounded by moderate to high resource communities. The Cities of Anaheim, Santa Ana, Westminster, Lake Forest, and San Juan Capistrano have concentrations of low resources areas. The high segregation and poverty areas are mostly found in the north-central region of the County. The County is committed to exploring programs and methods of increasing housing access and opportunity to both existing residents, future residents, and households in nearby areas.

Figure 4-9
TCAC/HCD Opportunity Map



Source: California Tax Credit Allocation Committee and Department of Housing and Community Development, 2021.

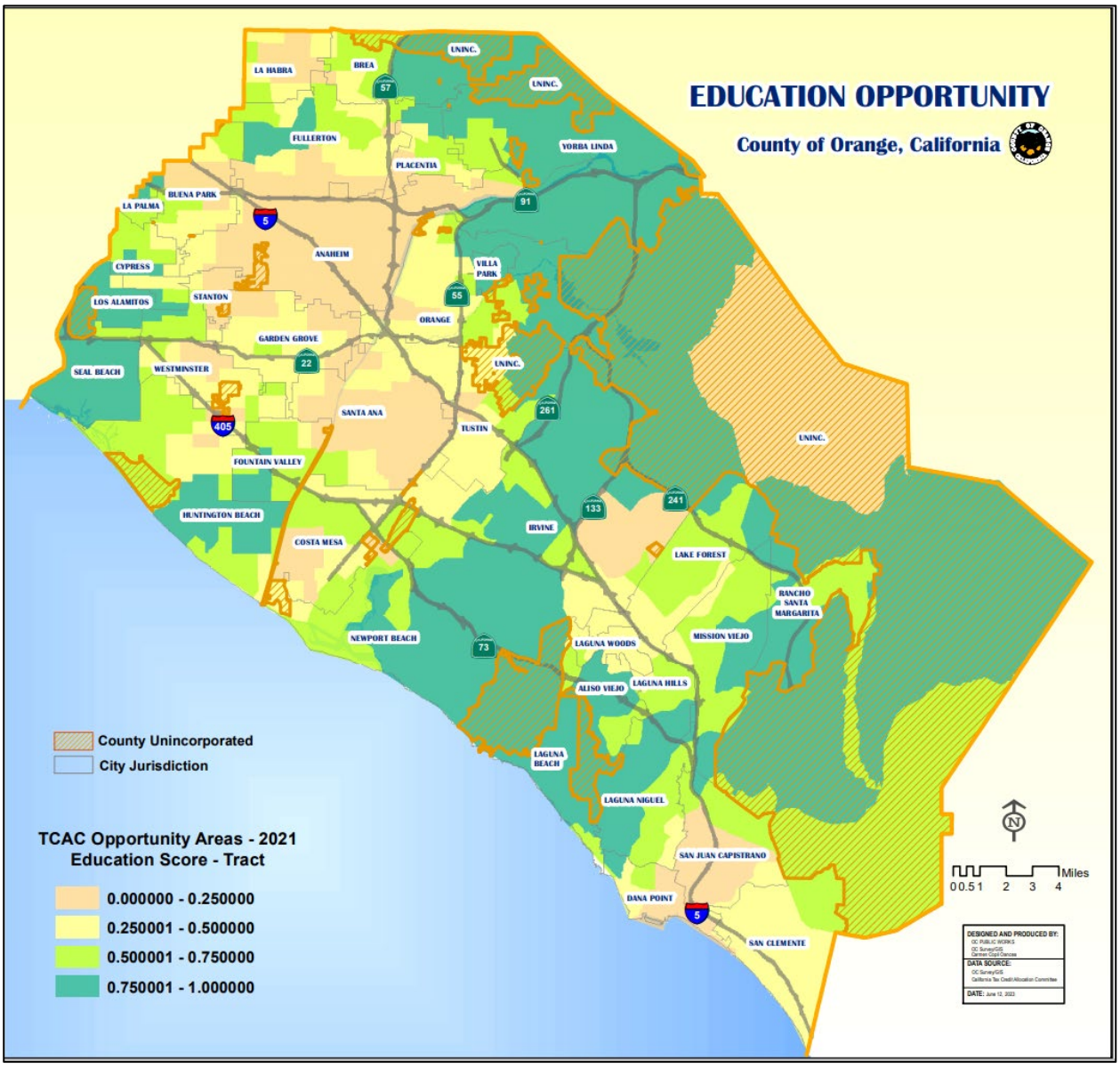
Education Opportunity

The TCAC/HCD Opportunity Area Maps include education data, as illustrated in **Figure 4-9**. 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.

As **Figure 4-10** shows, Orange County is categorized as having high positive education outcomes in the coastal, southern, and southeastern regions and less positive education outcomes in the more central regions of Orange County. The TCAC methodology for the 2021 analysis sites household income as a key component to positive educational outcomes. In the context of the maps, there is a positive correlation between census tracts with higher incomes and those with high positive education outcomes. The County has included programs in the Housing Action Plan intended to provide additional opportunities for existing and future residents throughout Unincorporated Orange County.

Figure 4-10
Education Opportunity Map



Source: HCD AFFH Data Viewer, TCAC Opportunity Areas, 2021

Economic Opportunity

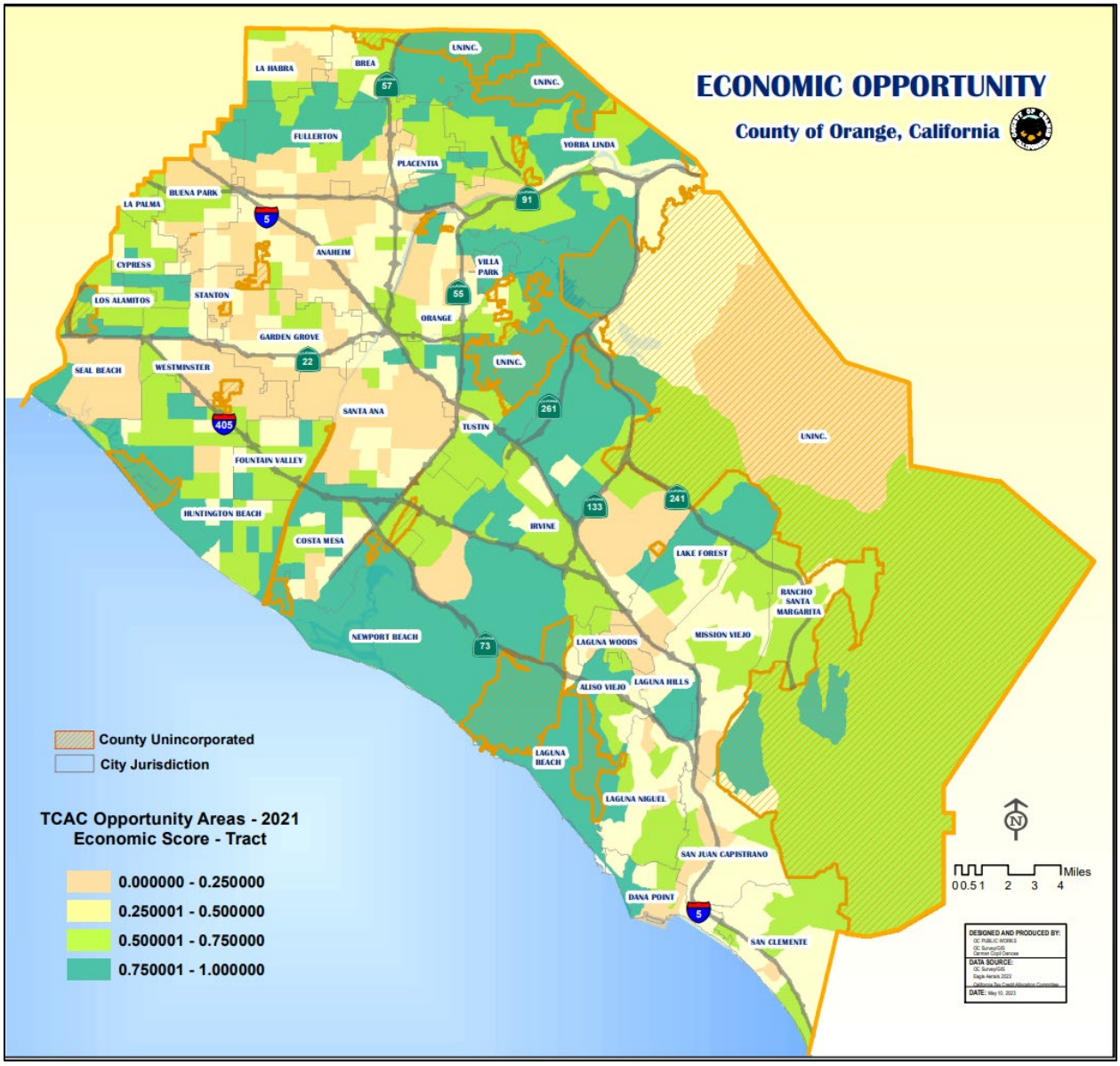
The TCAC/HCD Opportunity Area Maps include economic data, as illustrated in **Figure 4-11**. This data represents opportunity levels based on the following five factors:

- **Poverty** – Percent of population with income above 200% 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 (BA) 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.

As shown in **Figure 4-11** the County has a mix of positive and less positive economic outcomes throughout the region. Positive economic outcomes are generally related to access to education and level of education achieved and proximity to job centers or employment. Key indicators for less positive outcomes are generally related to poverty and home value. Similar to the education analysis above, income and positive employment are closely related. The areas with high positive economic outcomes are the southern, coastal, and eastern regions of the County; these areas include high income cities and communities such as Huntington Beach, Newport Beach, Laguna Beach, Mission Viejo, and Anaheim Hills.

As part of the County's candidate sites analysis, sites have been identified equally throughout the Unincorporated County areas; there are no concentrations of lower-income units identified. As such, the future development of affordable housing may occur in regions of the County providing various levels of opportunity for economic achievement.

Figure 4-11
Economic Opportunity Map



Source: HCD AFFH Data Viewer, TCAC Opportunity Areas, 2021.

Access to Transit

AllTransit, which is an online database that tracks connectivity, access, and frequency in the United States, 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 in **Table 4-15**, Orange County as a whole scored a 4.2 AllTransit performance score, illustrating moderate access to public transit to commute to work. One Unincorporated CDP, the Midway City CDP, has an AllTransit performance score of 5.9, which more closely matches the score of San Diego County as a whole. By contrast, the Coto de Caza, Ladera Ranch, and Las Flores CDPs, which are all located to the east of the center of the County and border wilderness areas, are lacking access to transportation, which may pose a challenge for future development in those areas. Those three CDPs, however, are mostly built out in accordance with Development Agreements and thus, additional development in those areas is unlikely and would be challenging to develop further due to fire hazards and other issues. Access to transportation increases both economic and environmental/health opportunities. As **Figure 4-12** shows, the north-western portion of the county is well connected. The eastern region is made up of mountainous area which decreases accessibility; however, there is a lack of connectivity in the southern region of Orange County.

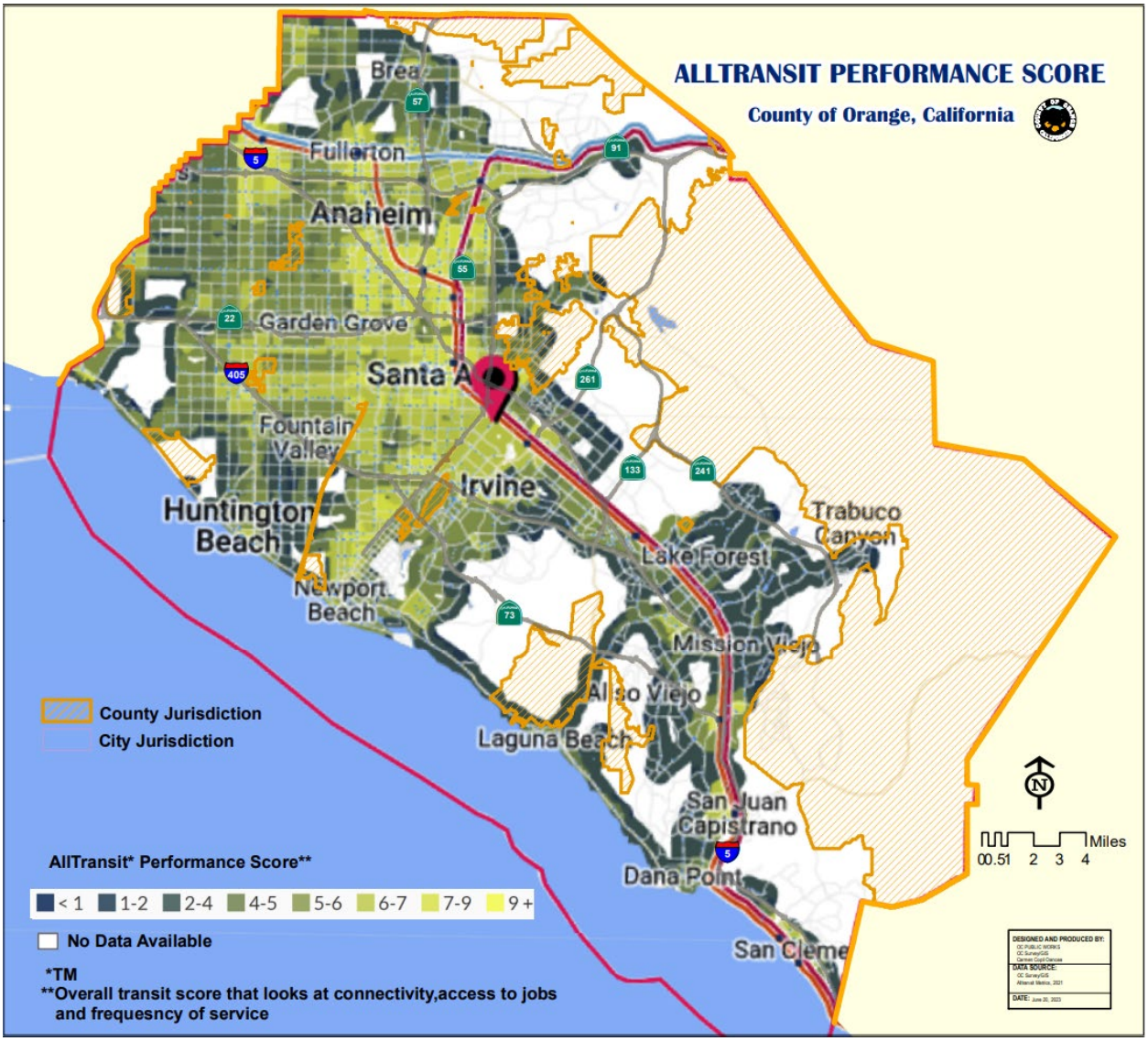
In comparison to Orange and San Diego Counties, Los Angeles County has the highest AllTransit Performance Score (6.8), depicting moderate access to public transit to commute to work. San Diego County and Orange County have similar transit scores, with San Diego County reporting a higher overall score.

Table 4-15
Orange County Transit Indicators, 2019

Jurisdiction	AllTransit Performance Score	Transit Trips Per Week within ½ Mile	Jobs Accessible in 30-Min Trip	Commuters Who Use Transit	Transit Routes Within ½ Mile
Orange County	4.2	528	172,595	2.28%	4
Coto de Caza CDP	0.1	16	1,845	0.41%	0
Midway City CDP	5.9	1,043	226,650	1.38%	8
Ladera Ranch CDP	0.2	3	534	0.16%	1
Las Flores CDP	0.3	22	6,814	0.00%	0
North Tustin CDP	2.8	262	109,250	0.35%	2
Rossmoor CDP	3.1	212	91,634	1.52%	3
Los Angeles County	6.8	2,608	321,664	6.66%	8
San Diego County	5.3	1,358	82,735	3.28%	4

Source: Center for Neighborhood Technology 2019, AllTransit.

Figure 4-12
AllTransit Performance Score – Orange County



Source: AllTransit Metrics, 2021.

Environmental Justice

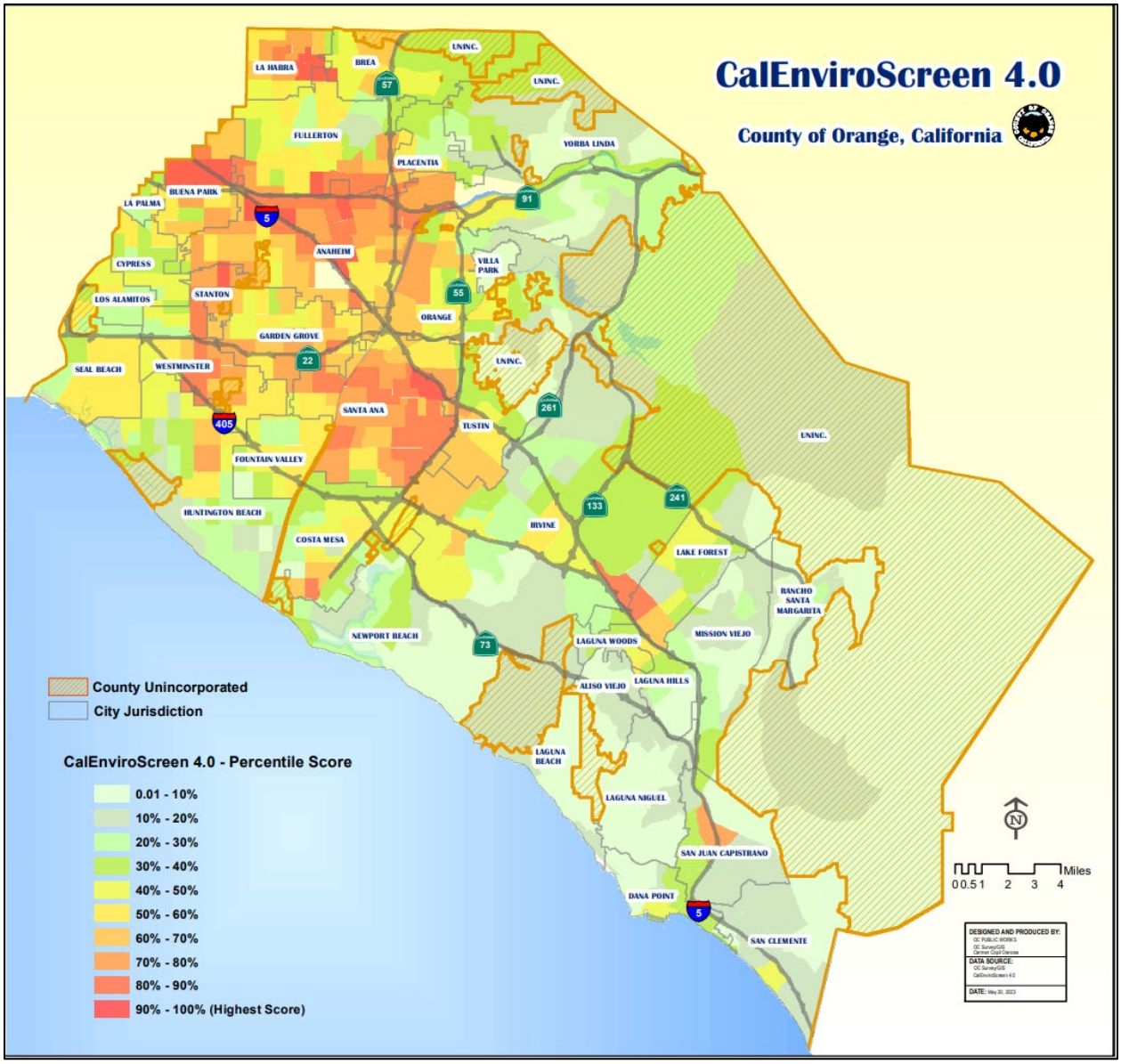
The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). In addition 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), CalEnviroScreen 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.

The CalEnviroScreen Model is made up of a suite of 20 statewide indicators of pollution burden and population characteristics associated with increased vulnerability to pollution's health effects. The model identifies areas of health risk by conducting the following:

> Uses a weighted scoring system to derive average pollution burden and population characteristics scores for each census tract.
>
> Comparing these scores for a given census tract to the other tracts in the state by multiplying the pollution burden and population characteristics components together.
>
> The final CalEnviroScreen score measures the relative pollution burdens and vulnerabilities in one census tract compared to others and is not a measure of health risk.

Figure 4-13 shows the central and northern region of the County are generally high scoring. The majority of the southern area of the county is low scoring and has low pollution burdens. Overall, high scores signify high pollution burdens and high exposure to harmful pollutants, specifically for residents in low-income census tracts. Low-income residents, or areas with higher percentages of low-income households are often disproportionately affected by poor environmental quality. Providing housing options near essential resources and economic opportunity/jobs can decrease overall vehicle miles traveled (VMT), which in many cases is related to air quality. Additionally, the County may work with developers to implement and increase the use of environmentally friendly materials and strategies.

Figure 4-13
CalEnviroScreen 4.0, Orange County



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022).

Figure 4-14 shows Census Tracts 6059087902 and 6059087805, which both include Unincorporated County areas that scored over the 70th percentile in CalEnviroScreen 4.0. The census tracts have a pollution burden of 87 and 90, respectively. For the Exposure Indicators and the Environmental Effects, these census tracts scored the following:

Census Tract 6059087902:

Exposures

- Ozone: 68
- Particulate Matter 2.5: 45
- Diesel Particulate Matter: 9
- Toxic Releases: 37
- Traffic 40
- Pesticides: 0
- Drinking Water: 16
- Lead from Housing: 7

Environmental Effects

- Cleanup Sites: 0
- Groundwater Threats: 0
- Hazardous Waste: 17
- Impaired Waters: 0
- Solid Waste: 0

Census Tract 6059087805:

Exposures

- Ozone: 43
- Particulate Matter 2.5: 74
- Diesel Particulate Matter: 35
- Toxic Releases: 90
- Traffic 46
- Pesticides: 48
- Drinking Water: 66
- Lead from Housing: 84

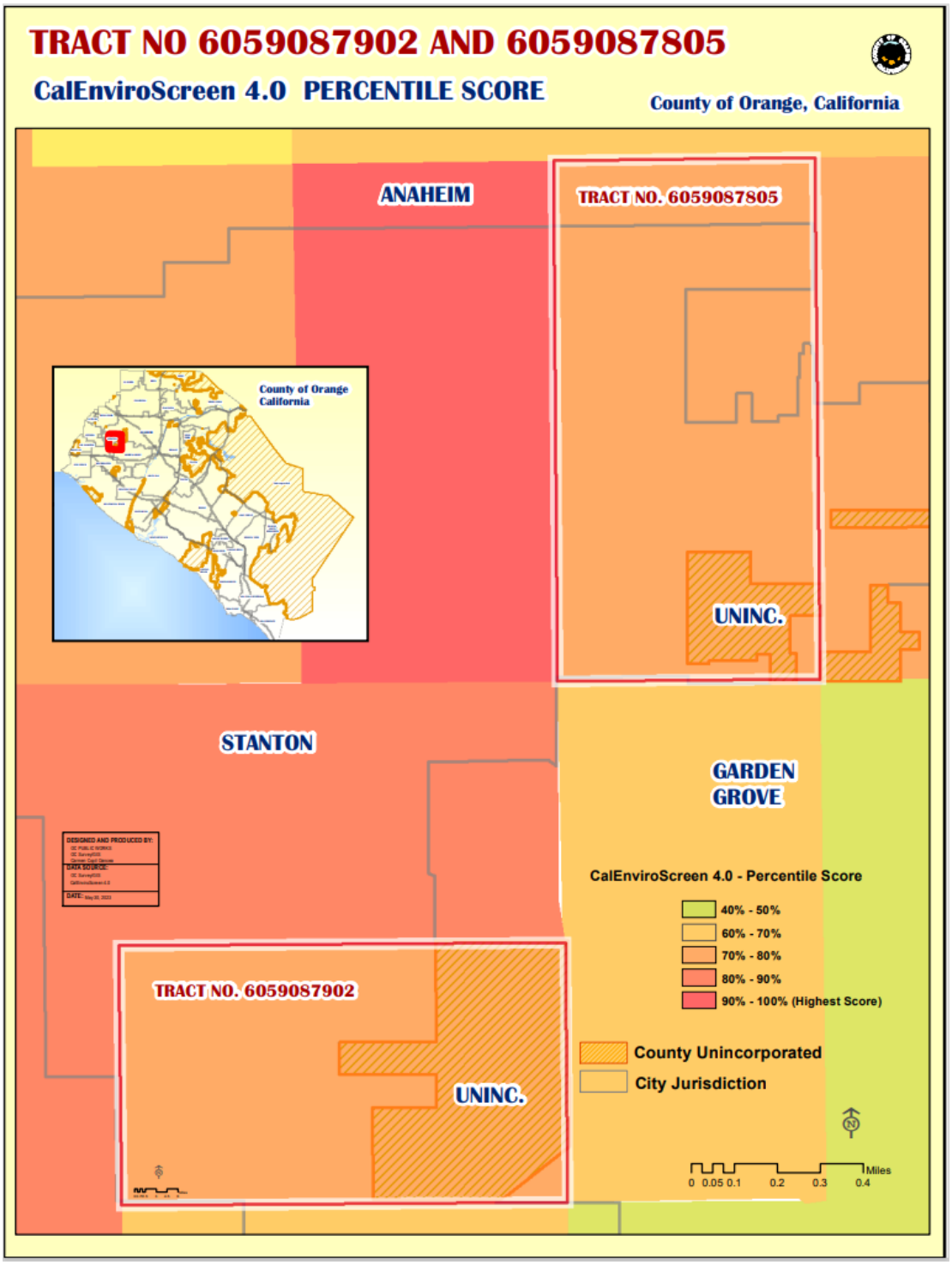
Environmental Effects

- Cleanup Sites: 84
- Groundwater Threats: 65
- Hazardous Waste: 95
- Impaired Waters: 0
- Solid Waste: 36

The census tract 6059087902 is located just south of the City of Stanton and is made up of single- and multifamily uses, and a variety of commercial uses along Beach Boulevard. The census tract is made up of 49.9% Hispanic population, 38.6% Asian American population, and 7.1% White population. Approximately 16.1% of the population includes children ages 10 years and younger, as well as 14.8% seniors 65 years and older.

The census tract 6059087805 is located just east of the City of Stanton and is made up of primarily single-family uses with two commercial parcels along Katella Avenue. The census tract is made up of 49.9% Hispanic population, 38.6% Asian American population, and 7.1% White population. Approximately 16.1% of the population includes children ages 10 years and younger, as well as 14.8% seniors 65 years and older.

Figure 4-14
CalEnviroScreen 4.0, Unincorporated Parcels 6059087902 and 6059087805



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022)

Figure 4-15 shows Census Tract 6059032059 which is one of the lowest scoring Unincorporated census tracts with a CalEnviroScreen 4.0 percentile of two. The census tract has a pollution burden percentile of three. For the Exposure Indicators and the Environmental Effects, the census tract scored the following:

Census Tract 6059032059:

Exposures

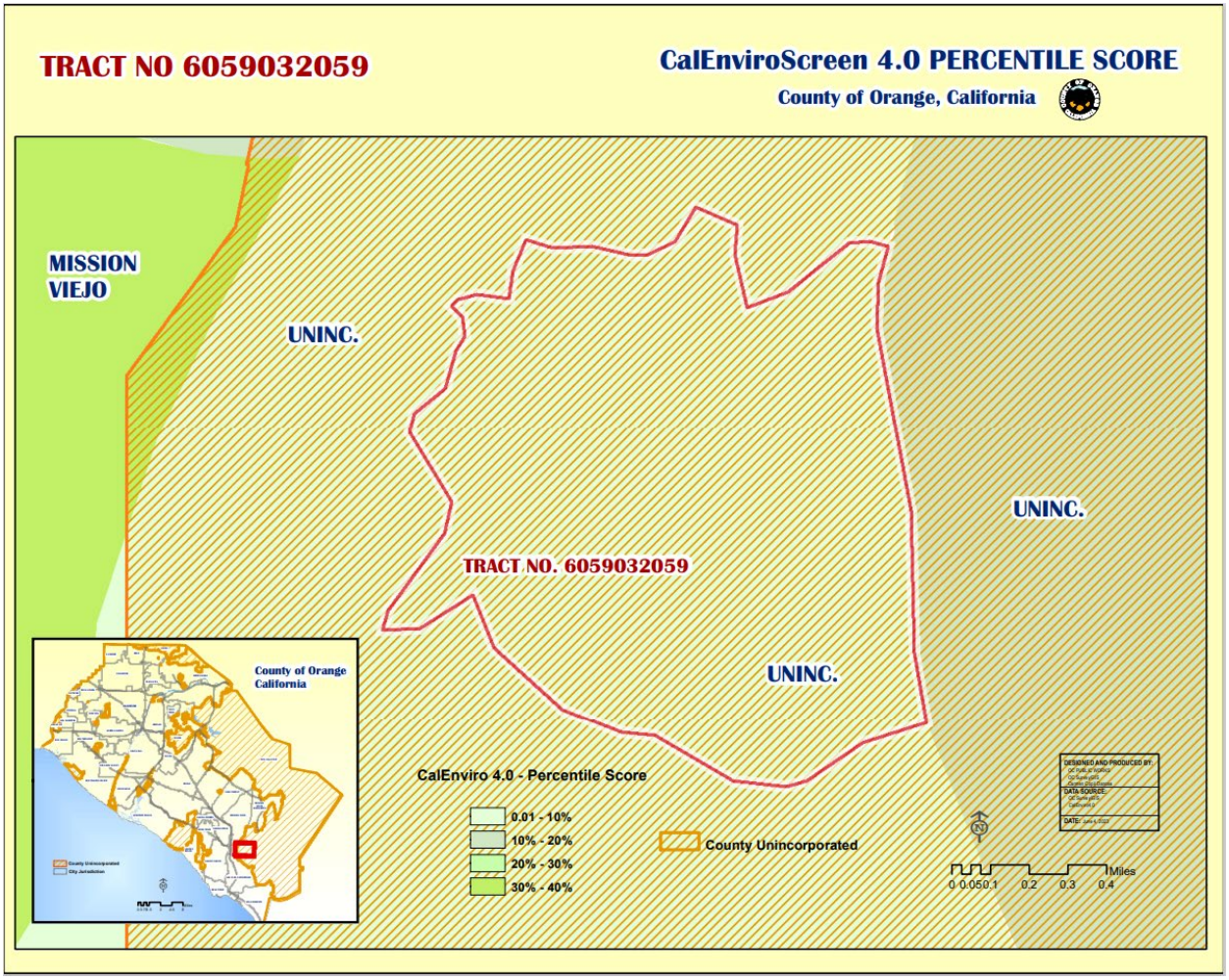
- Ozone: 68
- Particulate Matter 2.5: 45
- Diesel Particulate Matter: 9
- Toxic Releases: 37
- Traffic: 40
- Pesticides: 0
- Drinking Water: 16
- Lead from Housing: 7

Environmental Effects

- Cleanup Sites: 0
- Groundwater Threats: 0
- Hazardous Waste: 17
- Impaired Waters: 0
- Solid Waste: 0

The census tract is located in Ladera Ranch and includes a majority single-family residential uses, some multifamily uses, a middle school, and some commercial uses. The census tract is made up of 63.7% White population, 16.6% Asian American population, and 15.6% Hispanic population. Approximately 22.4% of the population includes children ages 10 years and younger, as well as 5.7% seniors ages 65 years and older.

Figure 4-15
CalEnviroScreen 4.0, Unincorporated Parcel 6059032059



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022).

Conclusion and Trends in Disparities in Access to Opportunities

Generally, access to opportunity is highest for non-Hispanic Whites and Asians/Pacific Islanders in Orange County. By contrast, access to opportunity is generally lower for Black residents than for non-Hispanic Whites and Asians and access is lowest for Hispanics. Metrics are lower on average in census tracts with more of each of these groups. Geographically, access to economic, environmental, and educational opportunity is generally lowest in portions of North Orange County. Anaheim, Garden Grove, Santa Ana, and Westminster all have relatively low scores across various dimensions of opportunity. Access to opportunity is also low in San Juan Capistrano. However, access to transportation is generally better in North Orange County than in South Orange County. There are Unincorporated County areas in all of these locations, but none of these Unincorporated County areas provides low opportunities generally.

Disproportionate Housing Needs and Displacement

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

A variety of factors affect housing needs for different households. In particular, income, other household characteristics, and disability are taken into consideration when proposing the type and size of housing units needed by different households, as well as accessibility of housing based on existing units in a jurisdiction. **Tables 4-16** and **4-21** show data for demographic characteristics of Orange County as a whole and Unincorporated County areas and CDPs if data was available, as compared to the State of California. Additional detailed analysis of the community's demographics is outlined in the Community Profile, Section 2, of this Housing Element.

The U.S. Department of Housing and Urban Development (HUD) designates four specific types of housing problems, which, if a household experiences at least one of, the households are considered to be facing housing problems. Those are: (1) housing unit lacks complete kitchen facilities; (2) housing unit lacks complete plumbing facilities; (3) household is overcrowded; and (4) household is cost-burdened. The Orange County AI found that approximately 45% of all households in Orange County experience some kind of housing problem, with Hispanic households experiencing the highest rate of housing problems. Among housing types, non-family households and households larger than five persons experience the highest rates of housing problems in Orange County.

Housing problems are considered "severe" by HUD if there is a complete lack of kitchen or plumbing, more than one person per room, or a cost burden greater than 50%. The Orange County AI examined households within Orange County experiencing severe housing problems

and found that Hispanic households similarly experience the highest rates of severe housing problems within Orange County. This data indicates that large households (greater than 5 people), non-family households, and Hispanic households disproportionately experience the highest levels of housing problems within Orange County in terms of percentages of total households of those types.

In terms of total numbers, the highest amount of housing problems is experienced by White/Non-Hispanic and Hispanic households, with those same populations experiencing the highest total numbers of severe housing problems. Housing problems are experienced by households of all sizes in Orange County (both family and non-family households), with a large percentage of households of every race/ethnicity experience housing problems, of which Hispanic households experience the highest rates of both housing problems and severe housing problems. As data elsewhere in this section discusses, cost-burden and overcrowding are two of the largest problems facing households in Orange County.

Table 4-16: Housing Problems, Orange County

Demographics of Households with Disproportionate Housing Needs			
Households Experiencing Any of 4 Housing Problems	Orange County		
	# with Problems	# Households	% with Problems
By Race/Ethnicity			
White, Non-Hispanic	206,658	540,773	38.22%
Black, Non-Hispanic	8,074	16,719	48.29%
Hispanic	152,740	241,841	63.16%
Asian or Pacific Islander, Non-Hispanic	84,193	186,038	45.26%
Native American, Non-Hispanic	1,063	2,179	48.78%
Total	**452,728**	**987,550**	**45.84%**
By Household Type and Size			
Family households, <5 people	228,740	576,690	39.66%
Family households, 5+ people	95,050	145,028	65.54%
Non-family households	138,270	273,662	50.53%
By Race/Ethnicity			
White, Non-Hispanic	104,324	540,773	19.29%
Black, Non-Hispanic	4,816	16,719	28.81%
Hispanic	107,752	241,841	44.55%
Asian or Pacific Islander, Non-Hispanic	50,205	186,038	26.99%
Native American, Non-Hispanic	544	2,179	24.97%
Total	**267,641**	**987,550**	**27.10%**

Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

As shown by the **Table 4-16**, in the County, 45.84% of residents overall face 1 of 4 housing problems. White and Asian or Pacific Islander residents have slightly lower rates of housing problems, at 38.22% and 45.26% respectively, while Black residents have a slightly higher rate of 48.29%. Hispanic residents have the highest rates at 63.16% countywide. Native American residents have a rate similar to the average at 48.74%, but the low populations of Native American residents across jurisdictions may lead to misleading data (which is why they are not as frequently discussed here). Housing problems are found in differing rates across family types, with 39.66% for families of 5 or less, 65.59% for families of 5 or more, and 50.53% for non-family households.

Cost Burden and Overpayment

Cost burden and overpayment must be viewed considering income data. **Table 4-17** shows that Orange County and the Unincorporated County areas have a higher household median income than the state overall. In the Unincorporated areas approximately 58% of households earn over $100,000 in annual income. This is a greater percentage than in Orange County as a whole and the State. Just under 50% of households in Orange County earn an annual income over $100,000, while 37.7% of households in California earn that same amount. Generally, a higher percentage of married couple households typically result in a higher median income in a community as these households may have more than one income source. Higher income provides means for safe and sufficient housing, as well as the ability to update and renovate older attributes of the home.

As previously stated, the State uses five income categories for the purpose of determining housing affordability and need in communities based on area median income (AMI), which refers to the midpoint of the income distribution for a specific geographic area, as defined by the U.S. Department of Housing and Urban Development (HUD) using data from the U.S. Census Bureau.

HUD annually develops median household income estimates based on census data for the purpose of determining program eligibility. All jurisdictions in Orange County, including the County, use HUD's annual median household estimate to determine eligibility for its affordable housing programs. The median household income that HUD developed to determine eligibility in in Orange County as a whole for the past several years was as follows:

- 2019 $97,900
- 2020 $103,000
- 2021 $106,700
- 2022 $119,100
- 2023 $127,800

The County's AMI has trended upward each year and for 2023 is $127,800. Using the most recent HUD-determined AMI, the five income eligibility categories are calculated as follows:

- **Extremely Low-income** - 30% or less of AMI (30% or less of the $127,800 AMI for Unincorporated County areas is $38,340 or less)
- **Very Low-income** - 50% or less of AMI (50% or less of the $127,800 AMI for Unincorporated County areas is less than $63,900)
- **Low-income** - 51% to 80% of AMI (51% or less of the $127,800 AMI for Unincorporated County areas is between $65,178 and $102,240)
- **Moderate-Income** - 81% to 120% of AMI (81% to 120% of the $127,800 AMI for Unincorporated County areas is between $103,518 and $153,360)
- **Above Moderate-Income** - more than 120% of AMI (121% of the $127,800 AMI for the Unincorporated County areas is greater than or equal to $154,638)

As shown by **Table 4-17** in Orange County as a whole, using the HUD-developed AMI, approximately 54% of households, compared to approximately 41% of households in the Unincorporated County areas, and 62% of households in the State, are considered extremely, very, or low-income. Thus, approximately 46% of households in Orange County as a whole are considered moderate-income or above.

Table 4-17
Households by Income

Household Income	Unincorporated Areas	Orange County	California
Less than $10,000	4.8%	4.2%	4.8%
$10,000-$14,999		2.7%	4.1%
$15,000-$24,999	5.2%	5.6%	7.5%
$25,000-$34,999	4.0%	6%	7.5%
$35,000-$49,999	5.0%	8.8%	10.5%
$50,000-$74,999	12.0%	14.6%	15.5%
$75,000-$99,999	10.2%	12.8%	12.4%
$100,000-$149,999	18.2%	18.6%	16.6%
$150,000-$199,999	--	11.1%	8.9%
$150,000-$250,000	21.7%	--	--
$200,000 or More	--	15.5%	12.2%
$250,000 or More	18.9%	**--**	**--**
Area Median Income*	**$82,214**	**$90,234**	**$75,235**

Source: American Community Survey, 5-Year Estimates, 2019.
**HUD-developed Area Median Income (AMI)*

As seen in **Table 4-18**, approximately 9% of those in owner occupied units and 41% of those in rental units earning 80% or less of the Unincorporated County areas AMI of $82,214, are facing cost burden or severe cost burden, which means those households are paying 30% or more of their income for housing, In comparison, as shown in **Table 4-19**, in Orange County as a whole, 18% of owner occupied and 46% of rental units in the same income categories are facing cost burden or severe cost burden. Housing cost burden has several consequences for a household, such as displacement from their current home creating limited access to essential goods and employment by potentially increasing commute times and removing available income from other necessities such as food. The data demonstrates that housing affordability is an issue in Orange County for all income categories. Programs 2 through 7 of the County's Housing Action Plan address this issue. In addition, there are a number of funding programs that can address this issue. See Housing Action Plan Section 5.

Table 4-18
Housing Cost as a Percentage of Household Income – Unincorporated Areas

Owner-Occupied Units					
Income Range	**Total Households**	**% of Total Owner Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	539	2.3%	23	30	486
$20,000-34,999	798	3.4%	191	124	483
$35,000-49,999	921	3.9%	208	101	612
$50,000-74,999	1,884	7.9%	523	172	1,189
$75,000+	19,376	81.4%	9,643	5,517	4,216
Zero or Negative Income	298	1.3%	0	0	0
Subtotal	**29,938**	**100%**	**10,588**	**5,944**	**6.986**
Renter-Occupied Units					
Income Range	**Total Households**	**% of Total Renter Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	774	12.6%	0	125	649
$20,000-34,999	569	9.3%	0	28	541
$35,000-49,999	425	6.9%	0	8	417
$50,000-74,999	1,097	17.9%	0	162	935
75,000+	2,640	43.1%	934	1,076	630
Zero or Negative Income	427	7.0%	0	0	0
No Cash Rent	190	3.1%	0	0	0
Subtotal	**6,122**	**100%**	**934**	**1,399**	**3,172**
Total Households	**36,060**	-	-	-	-

Source: American Community Survey, 5-Year Estimates, 2019
** 30% of income spent on housing is considered a "cost burden," and 50% or more of income spent on housing is considered a "severe cost burden" for a household*
Note: Some households are not accounted for; therefore, figures may differ slightly for other U.S. Census estimates for total households.

Table 4-19
Housing Cost as a Percentage of Household Income – Orange County

Owner-Occupied Units					
Income Range	**Number of Households**	**% of Total Owner Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	29,245	4.9%	1,999	1,887	25,359
$20,000-34,999	38,248	6.4%	8,530	5,426	24,292
$35,000-49,999	39,098	6.6%	11,640	5,973	21,485
$50,000-74,999	69,515	11.7%	23,902	10,047	35,566
$75,000+	414,714	70.0%	223,646	109,422	81,646
Zero or Negative Income	4,452	0.8%	0	0	0
Subtotal	**595,272**	**100%**	**269,717**	**132,755**	**188,348**
Renter-Occupied Units					
Income Range	**Number of Households**	**% of Total Renter Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	51,272	11.6%	468	3,308	47,496
$20,000-34,999	54,078	12.2%	1,199	1,598	51,281
$35,000-49,999	51,485	11.6%	1,024	3,003	47,458
$50,000-74,999	80,677	18.2%	2,479	19,533	58,665
75,000+	184,320	41.7%	73,847	76,826	33,647
Zero or Negative Income	10,167	2.3%	0	0	0
No Cash Rent	10,221	2.3%	0	0	0
Subtotal	**442,220**	**100%**	**79,017**	**104,268**	**238,547**
Total Households	**1,037,492**	**-**	**-**	**-**	**-**

Source: American Community Survey, 5-Year Estimates, 2019
** 30% of income spent on housing is considered a "cost burden," and 50% or more of income spent on housing is considered a "severe cost burden" for the household.*
Note: Some households are not accounted for; therefore, figures may differ slightly for other U.S. Census estimates for total households.

Table 4-20 displays data for household tenure (owner vs. renter) for Unincorporated Orange County, Orange County as a whole, and the State. 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 as homeownership allows for increased stability and opportunity to age in place. The data shows that just above half of Orange County and California households own their own home (57.4% and 54.8%, respectively), while just above three-quarters of households in Unincorporated Orange County own their own home. This suggests strong home ownership and stability in the Unincorporated County areas.

Table 4-20
Household Tenure

Household Tenure	Unincorporated Areas	Orange County	California
Owner Households	77.5%	57.4%	54.8%
Renter Households	22.5%	42.6%	45.2%
Total Occupied Housing Units	**41,617**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-year Estimates, 2019, SCAG Pre-Certified Housing Data, 2021

As shown by **Table 4-21** (Demographics of Households with Severe Housing Cost Burden Orange County), severe housing cost burden is a large but not as frequent problem for residents in Orange County. The average rate of residents experiencing severe housing cost burden is 21.55% across the county. Overall, White residents have a rate of 17.30%, Black residents 22.57%, Hispanic residents 24.78%, Data for the Unincorporated Areas was unavailable.

The Orange County Housing Authority (OCHA) administers Section 8 Housing Choice vouchers within the County. According to the 2021 Annual Public Housing Authority (PHA) Plan, the Housing Authority has allocated 11,306 housing choice vouchers, which can relieve cost burden and overpayment.

There are approximately 135 assisted tenants (this includes various types of assistance, not just Housing Choice Vouchers) in Unincorporated County areas. However, OCHA does not have enough funding to issue all the vouchers allocated from HUD. Currently OCHA is not able to issue approximately 750 vouchers. OCHA would need approximately $14,775,000/annually to serve 100% of the allocated vouchers, increased annually to account for inflation. This amount includes both the cost of housing assistance and administration costs. This funding gap is for the entirety of the Housing Choice Voucher Program, not specifically for the Unincorporated County areas. OCHA serves all 34 cities and Unincorporated County areas. Thus, funding for those vouchers should come from a variety of sources, not just the County. The County will continue to pursue funding to be able to issue all allocated vouchers.

Table 4-21
Demographics of Households with Severe Housing Cost Burden, Orange County

Race/Ethnicity	Orange County		
	Number of Households	Number with Severe Cost Burden	% with Severe Cost Burden
White, non-Hispanic	540,773	93,564	17.30%
Black, non-Hispanic	16,719	3,774	22.57%
Hispanic	241,841	59,920	24.78%
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020			

As discussed above, for the purposes of this analysis the Unincorporated County area has been divided into three subareas: Central Orange County, North Orange County, and South Orange County. The data shown below is based on tract-level data of Unincorporated County areas tracts. **Table 4-22, Table 4-23,** and **Table 4-24** show monthly housing costs as a percentage of household income by Unincorporated County subarea and tenure. Most occupied households in all Unincorporated County subareas are owner-occupied. In Central OC, 60.3% of households are owner-occupied, 66% in North OC, and 68.8% in South OC.

According to the 2022 ACS (5-year estimates), 36.1% of owners with a mortgage in Orange County spend less than 20% of their income on housing compared to 31.3% of owners with mortgages in Los Angeles County, 33.9% in Riverside County, 35.5% in San Bernardino County, and 33% in San Diego County. The second largest proportion of owners with mortgages in Orange County (28.6%) spend more than 35% of their household income on housing compared to 34.3% in Los Angeles County, 30.4% in Riverside County, 28% in San Bernardino County, and 30% in San Diego County.

Over the past ten years, the proportion of owners with a mortgage spending more than 35% of their household income has decreased in the Unincorporated County. According to the 2012 ACS (5-year estimates). 38.9% of owners with mortgages paid more than 35% of their monthly income on housing compared to 27.3% during the 2022 ACS.

More than a third of owner-occupied households with a mortgage in the Unincorporated County areas, including all Unincorporated County subareas spend less than 20% of their household income on housing. Nearly 37% of owners with a mortgage in Central Orange County, 37.4% in North County, and 36.3% in South County spend less than 20% of their income on housing. Like the proportion of owners with mortgages spending less than 20% of their income on housing, the proportion of owners with mortgages spending more than 30% of their income on housing is comparable in Central, North, and South Orange County. Approximately 28% of owners with

mortgages in Central OC, 26.4% in North OC, and 27.5% in South OC spend more than 35% of their household income on housing.

Table 4-22
Owner-Occupied Households with a Mortgage
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated County areas
<20%	36.8%	37.4%	36.3%	36.8%
20% - 24.9%	14.7%	16.7%	15.2%	15.5%
25% - 29.9%	11.5%	10.5%	12.8%	11.8%
30% - 34.9%	8.9%	9.0%	8.1%	8.6%
>35%	28.1%	26.4%	27.5%	27.3%
Not computed	0.6%	0.4%	0.7%	0.6%
Total households	**30,265**	**35,018**	**56,081**	**121,364**

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

For owner-occupied households without a mortgage, Orange County as a whole has a smaller proportion that spend more than 35% of their household income on housing (12.7%) compared to the neighboring counties of Los Angeles (14%), Riverside (14.9%), and San Diego (13.5%) but larger than San Bernardino County (11.5%). The proportion of owners without a mortgage paying over 35% of their monthly income on housing has increased over the past ten years. According to the 2012 ACS, 11.6% of owners without a mortgage in the Unincorporated County areas paid more than 35% of their household income on housing compared to 13.4% during the 2022 ACS.

Table 4-23 shows monthly housing costs for owner-occupied households without a mortgage as a percentage of household income. Most owners without a mortgage in all Unincorporated County subareas spend less than 15% of their monthly income on housing, including 66% in Central OC, 65.3% in North OC, 63.7% in South OC, and 64.9% in the Unincorporated County areas. Predictably, the proportion of owners without a mortgage spending more than 35% is smaller than the proportion of owners with a mortgage. South OC has the largest proportion of owners without a mortgage spending more than 35% of their income on housing (15.4%) compared to Central OC (12.3%), North OC (12%), and the Unincorporated County areas as a whole (13.4%). As mentioned above, South OC has the largest proportion of owner-occupied households (compared to renter-occupied households) compared to Central and North OC.

Table 4-23
Owner-Occupied Households without a Mortgage
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated Areas
<10%	50.1%	47.7%	41.8%	46.2%
10% - 14.9%	15.9%	17.6%	21.9%	18.7%
15% - 19.9%	9.7%	10.3%	8.8%	9.5%
20% - 24.9%	5.6%	6.8%	5.8%	6.1%
25% - 29.9%	2.9%	3.2%	3.7%	3.3%
30% - 34.9%	3.5%	2.4%	2.7%	2.9%
>35%	12.3%	12.0%	15.4%	13.4%
Not computed	2.8%	1.5%	2.7%	2.3%
Total households	**14,220**	**15,105**	**17,429**	**46,754**

Source: American Community Survey, 5-year Estimates, 2022. Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Renter-occupied households tend to experience cost burden at a higher rate than owner-occupied households. According to the 2022 ACS, the largest proportion of renters in Orange County spend more than 35% of their monthly household income on housing (46.1%). In comparison, 47.9% of renters in Los Angeles County, 48% in Riverside County, 47.9% in San Bernardino County, and 47.3% in San Diego County spend more than 35% of their household income on housing. Between the 2012 and 2022 ACS, the proportion of renter-occupied households in the Unincorporated County areas has remained relatively constant. During the 2012 ACS, 45.4% of renters paid more than 35% of their household income on housing compared to 45.6% in 2022.

As shown in **Table 4-24**, nearly half of renters in all Unincorporated County subareas spend more than 35% of their monthly household income on housing including 46% in Central OC, 47.9% in North OC, and 43.4% in South OC.

Table 4-24
Renter-Occupied Households
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated Areas
<15%	9.3%	6.5%	10.3%	8.8%
15% - 19.9%	9.1%	10.0%	10.2%	9.8%
20% - 24.9%	12.5%	11.6%	13.2%	12.5%
25% - 29.9%	12.7%	13.3%	12.1%	12.7%
30% - 34.9%	10.4%	10.7%	10.8%	10.6%
>35%	46.0%	47.9%	43.4%	45.6%
Not computed	5.9%	5.3%	7.7%	6.4%
Total households	**28,045**	**24,708**	**31,333**	**84,086**

Source: American Community Survey, 5-year Estimates, 2022. Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Overcrowding

Table 4-25 displays data for overcrowding in the Unincorporated County areas, Orange County, and the state. Overcrowding is defined as 1.01 to 1.5 persons per bedroom living in a household, and severe overcrowding is defined as more than 1.51 persons per bedroom. Overcrowding often occurs when nonfamily members combine incomes to live in one household, such as roommates. It also occurs when there are not enough size appropriate housing options for larger or multigenerational families. The data shows there are more overcrowded renter households in Unincorporated County areas and Orange County than the State (7.4%, 4.2% and 3.6%, respectively). Overcrowding in owner households is similar for all jurisdictions. The data shows that overcrowding disproportionately affects renter households over owner households.

Table 4-25
Households by Overcrowding

Overcrowding and Tenure	Unincorporated Areas	Orange County	California
Owner Households			
Overcrowded	1.6%	1.5%	1.6%
Severe Overcrowding	0.6%	0.6%	0.6%
Renter Households			
Overcrowded	7.4%	4.2%	3.6%
Severe Overcrowding	2.7%	2.6%	2.4%

Source: American Community Survey, 5-Year Estimates, 2019, SCAG Local Housing Metadata, 2018

Table 4-26 display comparative housing stock data for Orange County and California for overcrowded housing units by type. Data for the Unincorporated County areas is not available. A variety of housing stock provides increased opportunity in communities for different sizes and household types. The data shows that half of Orange County housing units are single-family, detached units. The State reports a slightly higher percentage; however, it has a much lower percentage of single-family, attached units than Orange County (7% and 12.3%, respectively). Multifamily housing developments of 10 or more units are of similar percentages for both jurisdictions, with 19.1% for Orange County and 17.5% in California.

Table 4-26
Overcrowded Housing Units by Type

Housing Unit Type	Orange County	California
1-Unit, Detached	50.6%	57.7%
1-Unit, Attached	12.3%	7.0%
2 Units	1.6%	2.4%
3 or 4 Units	6.9%	5.5%
5 to 9 Units	6.7%	6.0%
10 to 19 Units	5.4%	5.2%
20 or More Units	13.7%	12.3%
Mobile Home	2.7%	3.7%
Boat, RV, Van, etc.	0.1%	0.1%
Source: American Community Survey, 5-Year Estimates, 2019.		

According to the 2022 ACS, 3.9% of owner-occupied households in Orange County as a whole are overcrowded including 1% that are severely overcrowded. Orange County has a smaller proportion of overcrowded owner-occupied households compared to Los Angeles County (5.8% overcrowded, 1.7% severely overcrowded), Riverside County (5.1% overcrowded, 1.2% severely overcrowded), and San Bernardino County (5.9% overcrowded, 1.6% severely overcrowded), but a slightly larger proportion than San Diego County (3.6% overcrowded, 0.9% severely overcrowded).

Renter households are significantly more likely to experience overcrowding. In Orange County, 15% of renter households are overcrowded and 6.1% are severely overcrowded. Orange County has a larger population of overcrowded renter households compared to Riverside County (12.4% overcrowded, 6.1% severely overcrowded), San Bernardino County (14% overcrowded, 4.7% severely overcrowded), and San Diego County (10.8% overcrowded, 4.2% severely

overcrowded), but a smaller proportion compared to Los Angeles County (15.6% overcrowded, 7.3% severely overcrowded).

Based on 2012 ACS estimates, the proportion of owner- and renter-occupied households experiencing overcrowding in Orange County has decreased. During the 2012 ACS, it was estimated that 4.1% of owner households and 17% of renter households were overcrowded Countywide.

Table 4-27 shows persons per room by tenure and Unincorporated subarea. A smaller proportion of both owners and renters experience overcrowding in the Unincorporated County areas compared to the County as a whole. Approximately 2.5% of owners in the Unincorporated areas are overcrowded, including 0.7% severely overcrowded, and 9.9% are renters are overcrowded, including 3.8% severely overcrowded. The Unincorporated South County area has a smaller proportion of overcrowded owner households compared to the Central and North areas. North Orange County has the largest proportion of overcrowded renters (16.8%) compared to Central (9.2%) and South OC (5.2%).

Table 4-27
Persons per Room by Unincorporated Subarea and Tenure

	Central OC	North OC	South OC	Unincorporated Areas
Owner-occupied				
Total	45,045	50,514	74364	169923
<1.0 persons per room	96.7%	96.8%	98.5%	97.5%
>1.0 persons per room (overcrowded)	3.3%	3.2%	1.5%	2.5%
>1.5 persons per room (severely overcrowded)	1.2%	0.7%	0.3%	0.7%
Renter-occupied				
Total	29,689	26,021	33,731	89,441
<1.0 persons per room	90.8%	83.2%	94.8%	90.1%
>1.0 persons per room (overcrowded)	9.2%	16.8%	5.2%	9.9%
>1.5 persons per room (severely overcrowded)	2.5%	7.3%	2.4%	3.8%
All households				
Total	74,734	76,535	108,095	259,364
<1.0 persons per room	94.3%	92.2%	97.4%	95.0%
>1.0 persons per room (overcrowded)	5.7%	7.8%	2.6%	5.0%
>1.5 persons per room (severely overcrowded)	1.7%	2.9%	1.0%	1.8%

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Substandard Housing

Table 4-28 below displays housing stock by year built for Unincorporated County areas, Orange County and California. Older housing generally requires more upkeep, regular maintenance, and can cause a cost burden on both renters and homeowners. The data shows a greater percentage of homes built throughout California before 1960 compared to Orange County as a whole. Housing stock in Unincorporated County areas are similar to the State with 24.8% and 28.4%, respectively, of homes built before 1960. Orange County experienced a large housing boom between 1960 and 2000 which resulted in the development of about 70% of the total housing stock. In comparison, 57% of the State's housing stock was built during those 40 years. Overall, increased numbers of older housing can lead to displacement, cost burden, and substandard living conditions.

Table 4-28
Percentage of Housing Units by Year Built

Year Built	Unincorporated Areas	Orange County	California
Built 2014 or later	3.4%	2.7%	1.7%
Built 2010 to 2013		2.0%	1.7%
Built 2000 to 2009	22.1%	8.3%	11.2%
Built 1990 to 1999	14.7%	11.7%	10.9%
Built 1980 to 1989	7.3%	14.9%	15.0%
Built 1970 to 1979	9.7%	23.3%	17.6%
Built 1960 to 1969	18.1%	19.5%	13.4%
Built 1950 to 1959	20.4%	13.0%	13.4%
Built 1940 to 1949	1.9%	2.1%	5.9%
Built 1939 or earlier	2.5%	2.5%	9.1%
Source: American Community Survey, 5-Year Estimates, 2018,2019			

Through the Neighborhood Preservation program, the County identified 49 units in the Unincorporated County areas in need of maintenance or some repair between 2014 to 2021. Substandard units are those in need of repair or replacement. Based on 2019 ACS data for the Unincorporated County areas, approximately 0.34% of housing units (144 units) lack complete plumbing facilities, 1% (424 units) lack complete kitchen facilities, and 1% (424 units) do not have telephone service available. In Orange County, approximately 0.39% of housing units (4,292 units) lack complete plumbing facilities, 1.29% (14,196 units) lack complete kitchen facilities, and 1.95% (21,450 units) do not have telephone service available. Comparatively, in the Los Angeles County Service Area, 5.7% of homes have a basic housing quality problem,

4.4% in Riverside County and 7.2% in San Diego County have a basic housing quality problem – either a moderate or severe physical problem.[24]

The current distribution of the age of homes in Orange County as a whole (**Table 4-29**), also indicates that a majority of homes were built prior to the 1990 Americans with Disabilities Act (ADA), which may result in a lack of accessible homes for those residents experiencing a disability. Comparatively, homes in Unincorporated CDPs are newer – with 42% being built post-1989, compared to only 24.7% built in that same time period in Orange County as a whole. In Orange County as a whole 75.3% of homes pre-date 1989. The data for Unincorporated CDPs shows that in the areas covered by the CDPs the urgency of rehabilitating housing stock is not as acute as in Orange County as a whole. In contrast to the Unincorporated CDPs, Orange County's older housing stock reflects a rapidly gaining need to rehabilitate housing to meet minimum livability and quality requirements, which is a barrier to many homeowners and residents in Orange County who have a lower income or a fixed income.

In general, housing units that are 30 years or older are more likely to need minor rehabilitation or repairs while housing units aged 50 or older are more likely to need major rehabilitation. According to the 2022 ACS (5-year estimates), 35.4% of housing units in Orange County as a whole were built prior to 1970 and are aged 50 or older and 37.4% were built between 1970 and 1990. In comparison, 58.1% of housing units in Los Angeles County were built prior to 1970, 17% in Riverside County, 28.2% in San Bernardino County, and 29.3% in San Diego County. Of housing units built prior to 1990, Orange County has a proportion (72.8%) comparable to San Diego County (70.1%) and San Bernardino County (67%), larger than Riverside County (51.3%) and smaller than Los Angeles County (83.8%).

Table 4-29 shows when housing units were built in Unincorporated County subareas. In the Central and North Unincorporated County areas, the largest proportion of housing units were built between 1960 and 1979, whereas the most housing units in the South Unincorporated County areas were built between 1990 and 2019.

[24] National Center for Healthy Housing, Los Angeles, Riverside and San Diego CA Metrics, 2018. Accessed Online: January 18, 2022. https://nchh.org/tools-and-data/data/state-of-healthy-housing/rankings/location/los-angeles-ca/?data-year=2018

Table 4-29
Year Housing Unit Built by Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated Areas
Built 2020 or later	0.4%	0.1%	1.5%	0.8%
Built 2010 to 2019	6.7%	5.3%	20.6%	12.3%
Built 2000 to 2009	7.7%	7.7%	16.5%	11.5%
Built 1990 to 1999	11.5%	8.2%	23.5%	15.7%
Built 1980 to 1989	13.4%	13.7%	14.8%	14.1%
Built 1970 to 1979	22.7%	25.7%	12.0%	19.0%
Built 1960 to 1969	23.1%	20.8%	5.3%	14.8%
Built 1950 to 1959	12.5%	16.3%	2.5%	9.3%
Built 1940 to 1949	1.1%	1.0%	1.3%	1.2%
Built 1939 or earlier	0.9%	1.1%	2.1%	1.4%
Total households	**78,891**	**79,385**	**118,939**	**277,215**

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Units lacking complete plumbing or kitchen facilities can also be indicators for substandard housing. As shown in **Table 4-30**, North Orange County has the largest proportion of households lacking complete plumbing facilities. However, only 0.3% of households in North Orange County (0.2% of owner-occupied households and 0.4% of renter-occupied households) lack complete plumbing facilities. In the Unincorporated County areas as a whole, 0.2% of both owner-occupied and renter-occupied households lack complete plumbing facilities.

Table 4-31 shows units lacking complete kitchen facilities by tenure and Unincorporated subarea. A larger proportion of households in the Unincorporated County areas (1%) lack complete kitchen facilities compared to plumbing facilities. Like the trend for plumbing facilities, North Orange County has the largest proportion of occupied units lacking complete kitchen facilities (1.6%) compared to Central (0.8%) and South (0.6%) Orange County. Additionally, a larger proportion of renter-occupied households in the Unincorporated County areas lack complete kitchen facilities (2.3%) compared to owner-occupied households (0.3%).

Table 4-30
Units Lacking Complete Plumbing Facilities by Tenure and Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated County Areas
Owner-occupied				
Total households	45,045	50,514	74,364	169,923
Complete plumbing facilities	99.9%	99.8%	99.8%	99.8%
Lacking plumbing facilities	0.1%	0.2%	0.2%	0.2%
Renter-occupied				
Total households	29,689	26,021	33,731	89,441
Complete plumbing facilities	100.0%	99.6%	99.9%	99.8%
Lacking plumbing facilities	0.0%	0.4%	0.1%	0.2%
All households				
Total households	74,734	76,535	108,095	259,364
Complete plumbing facilities	99.9%	99.7%	99.8%	99.8%
Lacking plumbing facilities	0.1%	0.3%	0.2%	0.2%

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

Table 4-31
Units Lacking Complete Kitchen Facilities by Tenure and Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated County Areas
Owner-occupied				
Total households	45,045	50,514	74,364	169,923
Complete plumbing facilities	99.8%	99.8%	99.7%	99.7%
Lacking plumbing facilities	0.2%	0.2%	0.3%	0.3%
Renter-occupied				
Total households	29,689	26,021	33,731	89,441
Complete plumbing facilities	98.3%	95.6%	98.9%	97.7%
Lacking plumbing facilities	1.7%	4.4%	1.1%	2.3%
All households				
Total households	74,734	76,535	108,095	259,364
Complete plumbing facilities	99.2%	98.4%	99.4%	99.0%

Lacking plumbing facilities	0.8%	1.6%	0.6%	1.0%

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Homelessness

People experiencing homelessness are those who do not have a fixed, regular, and adequate overnight residence, or whose overnight residence is a shelter, street, vehicle, or enclosure or structure unfit for habitation. Factors contributing to increases of homelessness may include the following:

- Lack of access to available resources to support stable housing access.
- Spikes in rent increase and lack of tenant protections.
- Housing discrimination.
- Evictions and lack of support or relocation services available.
- Lack of housing affordable to very low, low- and moderate-income persons/households.
- Increases in the number of persons whose incomes fall below the poverty level.
- Reductions in public subsidies to the poor.
- The deinstitutionalization of the mentally ill.

According to the Orange County Homeless Point-in-Time Count, in 2019 there were an estimated 43 unhoused persons in the Unincorporated County areas. The counts for 2020 and 2021 were provided by 2-1-1 Orange County and these reports provide total figures for Orange County as a whole and do not break down the figures for each city and the Unincorporated County areas. In 2020, a total of 3,017 persons experienced homelessness across Orange County, this decreased to 2,441 in 2021.

As mentioned above, there were 2,441 unhoused persons in Orange County in 2021. In comparison, in 2022 Los Angeles County recorded 69,144 unhoused persons (HUD exempted Los Angeles County from a 2021 unsheltered point-in-time count). In 2022, San Diego County counted 8,427 unhoused persons, Riverside County counted 3,316 unhoused persons, and San Bernardino County counted 3,333 unhoused persons. In general, Orange County has a smaller population of persons experiencing homelessness compared to neighboring jurisdictions. While the number of unhoused persons in Orange County is similar to Riverside and San Bernardino, Orange County has a larger overall population, where the unhoused population represents a smaller proportion of the population countywide. The racial and ethnic demographic data for unhoused persons in 2021 is not broken down by jurisdictions; however, for the 2,441 unhoused persons across Orange County accessing shelter, 10% experienced chronic homelessness. Additionally, 77% identified as White, 12% identified as Black, 3% identified as American Indian, less than 1% identified as Native Hawaiian, and 45% identified as Hispanic or Latino. About 295 persons were seniors (age 62 years and older), and about 102 persons were transzonal

aged youth between the ages of 18 to 24, 288 persons were experiencing domestic violence, and 162 persons were veterans. Of the persons living in shelters, 334 experience mental health conditions, 308 persons experience a physical disability, and 297 persons reported substance abuse.[25]

The results from the 2024 Point-in-Time (PIT) count were recently released (as of July 2024). The 2024 PIT count includes geographic breakdowns for populations of persons experiencing homelessness. According to the 2024 count, there were 3,227 persons counted experiencing homelessness in North Orange County (1,646 unsheltered and 1,581 sheltered) including six unsheltered individuals in the Unincorporated North County areas. In Central Orange County, 3,454 persons were counted during the 2024 PIT count (2,036 unsheltered and 1,418 sheltered) including 35 in the Unincorporated County areas (21 unsheltered and 14 sheltered). South Orange County had the smallest share of persons experiencing homelessness, totaling 641 persons (491 unsheltered and 150 sheltered), including only three unsheltered individuals in the Unincorporated County areas. Overall, the Central Unincorporated County area has the largest population of persons experiencing homelessness compared to the North and South Unincorporated County areas. According to the 2023 PIT Count Report, when survey respondents were asked the reason why they chose a particular location, area and/or city to stay in during their time experiencing unsheltered homelessness, over 85% of people gave a reason related to familiarity, relationships or safety. Over half (51.7%) of survey respondents indicated the location chosen was due to its familiarity. The next two most common responses were having a friend of family member in the area (18.8%) and feeling safe in the location (15.2%). Lower income households tend to be at higher risk of becoming homeless.

The North and Central County areas tend to have larger populations of lower income households compared to the South County, in part due to the distribution of housing options available in the given neighborhoods. Lower income households are generally more vulnerable to eviction and/or becoming homeless. As shown below, emergency shelters tend to be more concentrated in the North and Central County areas compared to the South County. In addition to the concentration of emergency shelters, the North and Central County areas have a higher density of services for unhoused individuals. The density of shelters and services may contribute to the concentration of unhoused individuals in the North and Central County. The County coordinates with several service providers to support persons experiencing homelessness. The programs available to the unhoused population are detailed below.

Emergency Shelter Operations and Services. The Program provides safe, temporary shelter services to individuals/families experiencing homelessness with the goal of ensuring a household's experience with homelessness is as brief as possible by offering housing-focused

[25] Orange County Homeless Point-in-Time Count, Orange County Homeless Management Information Systems. 2019, 2020 and 2021. Accessed online: January 19, 2021.

case management and connections to supportive services. The Program follows best practices such as, housing first principles and incorporate evidenced-based approaches such as motivational interviewing, progressive engagement, trauma-informed care, harm reduction and risk management, to address barriers to housing and economic stability.

The Program operates in accordance with the Orange County's Standards of Care for Emergency Shelter Providers (Standards of Care). The Standards of Care is a comprehensive set of administrative, operational, and facility-based standards designed to support the quality and consistency of program operations, evidence-based participant services, core organizational and administrative functions, and facility design and operations.

The following contracted providers assist the County in administering the Emergency Shelter Operations and Service Program:

- Home Aid Orange County's HomeAid Family Care Center serving families experiencing homelessness in the North and Central Service Planning Area
- Pathway's of Hope's New Vista and Via Esperanza serving families experiencing homelessness in the North Service Planning Area
- Illumination Founday's shelter programs serving families in the Central Service Planning Area
- Family Assistance Ministries for FAMily House serving families experiencing homelessness in the South Service Planning Area
- Mercy House – Buena Park Navigation Center serving individuals experiencing homelessness in the North Service Planning Area
- Friendship Shelter's Alternative Sleeping Location serving individuals experiencing homelessness sin the South Service Planning Area
- Covenant House California's Emergency Shelter serving transitional aged youth, countywide
- Interval House for Survivors of Domestic Violence Shelter, countywide

Rapid Rehousing Services. The Rapid Rehousing Services assists households experiencing literal homelessness, either sheltered or those living in a place not meant for human habitation, to transition into permanent housing. The services under the Rapid Rehousing Services Contracts are designed to provide up to 12 months of assistance to households looking to secure permanent housing and housing stabilization services to support housing retention. The Rapid Rehousing Services include the following services at a minimum: intake and assessment, housing-focused case management, financial assistance, housing stabilization and supportive services. Financial assistance supports participants with one-time costs associated with securing housing, including application fees, security deposit, rental arrears, utility assistance, and move-in expenses, as well as ongoing monthly rental assistance payments to access and maintain housing.

The following contracted providers assist the County in administering the Rapid Rehousing Services Program:

- PATH - People Assisting the Homeless for Rapid Rehousing Services for Individuals, providing services countywide
- Covenant House California for Rapid Rehousing Services for Transitional Aged Youth, providing services countywide
- Families Forward for Rapid Rehousing Services for Families, providing services countywide

Regional Coordination of Services. The Regional Care Coordination Services are designed to provide comprehensive care coordination with the goal of assisting individuals to increase their income and secure permanent housing. The Regional Care Coordination Services includes the following service elements:

- Coordinate with O&E to determine areas for targeted outreach and engagement to build relationships that provide care coordination and support in accessing services, mainstream services, homeless service programs and other resources.
- Intake and assessment to determine the history of participation in other homeless service programs and collection of needed or missing information.
- Case management services to ensure proper care coordination to address the needs of participants with a focus on providing support and identifying permanent housing options.
- Disability benefits advocacy to support participants in filing complete and timely applications and appeals, represent individuals at administrative hearings and establish good working relationships with the Social Security Administration services providers as needed to ensure adequate representation utilizing the SSI/SSDI Outreach, Access and Recovery (SOAR) model.
- Housing navigation services to support the participant in identifying available housing units and resources, completing needed forms and applications for housing.
- Coordinate and collaborate with the other components of the System of Care, Orange County Continuum of Care and key stakeholders throughout the SPA to employ a multidisciplinary approach to assist participants in accessing services and/or programs.
- Participate in the Care Plus Program, the System of Care Data Integration System (SOCDIS) and assist in the engagement of high utilizes of County services by gathering consent and expeditiously connecting participants to the correct service or resource cohesively by facilitating transportation.

The following contracted providers assist the County in administering the Regional Care Coordination Services Program:

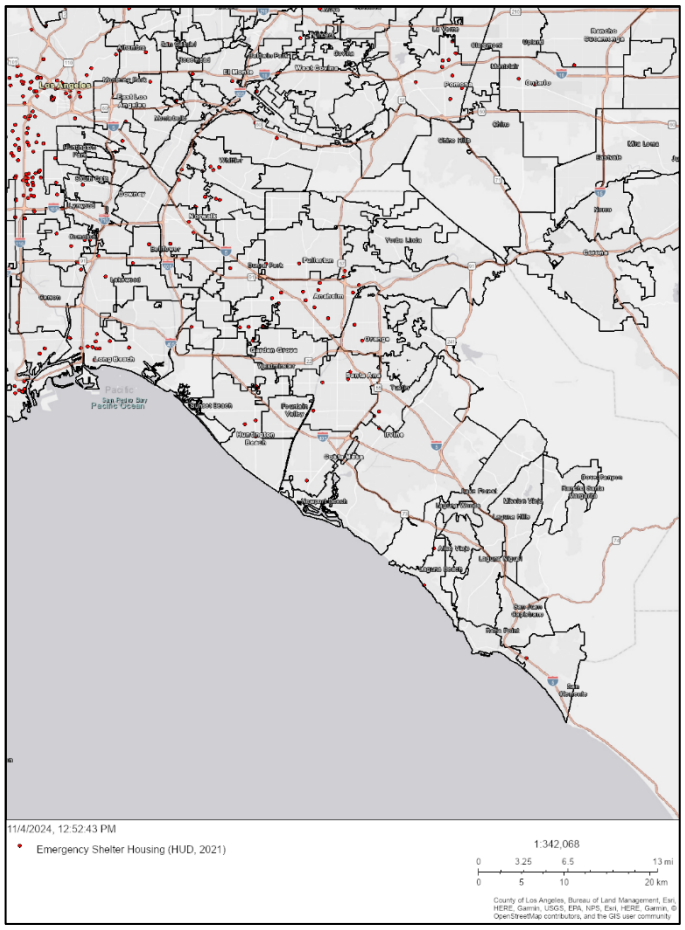
- Volunteers of America Los Angeles (VOALA) providing services in the North Service Planning Area
- PATH, People Assisting the Homeless providing services in the Central Service Planning Area
- Friendship Shelter providing services in the South Service Planning Area

County staff has also identified specific areas where encampments tend to occur. Recently, encampments have been identified along the Santa Ana River in the North County area, Talbert Regional Park in the Central County area, and Beach Boulevard in Garden Grove in the Central County area. Past concentrations of unhoused individuals tended to be more spread out but have been impacted by County clearing resolutions which have provided outreach and services to many unhoused individuals while addressing encampments. The following encampment resolution projects have been implemented in the North and Central County areas in recent years.

Between early January and early April 2018, workers from across the County of Orange focused their efforts on hundreds of homeless individuals who had established encampments along a three-mile stretch of the Santa Ana River, part of the Orange County Flood Control Channel in the Northern area of the County. Through the coordinated work of numerous employees – ranging from outreach workers to park rangers to social workers to Sheriff 's deputies and others – the County successfully connected more than 730 homeless people with motel stays and shelter, removed 404 tons of debris from the area, and reopened the portion of the Santa Ana River Trail for recreational use. The Santa Ana River encampment represented the largest concentration of homeless in Orange County.

In 2021, OC Park Rangers, Costa Mesa Park Rangers, Costa Mesa Police Department, and Costa Mesa Network for Homeless Solutions staff, as well as Costa Mesa Public Works assisted homeless persons living in the Talbert Regional Park. Under coordination with the County, People Assisting the Homeless (PATH) provided services under the Encampment Resolution Funding (ERF) Program to assist those experiencing homelessness in Talbert Regional Park. During FY 2020-21, 129 individuals experiencing homelessness were identified at Talbert Regional Park, and understanding the population does fluctuate, the funding was targeted to provide 60 individuals experiencing homelessness services and resources they need to end their homelessness. The ERF Program also included funding to restore the areas of Talbert Park impacted by those experiencing unsheltered homelessness. Nine individuals who were still encamped at Talbert Park following notice being given to vacate the area, were engaged by outreach personnel and offered access to a shelter bed and food. Individuals were also connected with social services. Many of the individuals residing in the encampment left the area in advance of the joint County and City of Costa Mesa outreach efforts. This effort successfully achieved 75 program enrollments, including 50 individuals placed in public housing and 11 individuals placed in permanent housing.

PATH's scope of work will continue to include care coordination services under the Encampment Resolution Funding (ERF) Program to people experiencing homelessness within the encampment located at Beach Boulevard and Trask Avenue in the City of Garden Grove. PATH will transition the ERF Program team from the City of Costa Mesa working to address the Talbert Regional Park to the City of Garden Grove starting July 1, 2024. This will allow the County and the City to leverage the experience and expertise in working with ERF and addressing homeless encampments. This includes dedicated staffing to engage, build rapport and help ensure connections to services and housing options. PATH will utilize the care coordination model and employ a multidisciplinary approach for service delivery. PATH will leverage regional collaboration between street outreach providers, street medicine programs, and other community-based organizations to provide personalized and comprehensive wrap-around services.



Emergency Shelters (2021)

Displacement

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 developed a neighborhood change database to map neighborhood transformations and identify areas vulnerable to gentrification and displacement. 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. The following lists the criteria used to identify each displacement typology used in **Figure 4-16**:

Low-Income/Susceptible to Displacement.

- Low or mixed low-income tract in 2018.

Ongoing Displacement of Low-Income Households.

- Low or mixed low-income tract in 2018.
- Absolute loss of low-income households, 2000-2018.

At Risk of Gentrification.

- Low or mixed low-income tract in 2018.
- Housing affordable to low or mixed low-income households in 2018.
- Didn't gentrify 1990-2000 or 2000-2018.
- Marginal change in housing costs or Zillow home or rental value increases in the 9^{0t}h percentile between 2012-2018.
- 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.

Early/Ongoing Gentrification.

- Low or mixed low-income tract in 2018.
- Housing affordable to moderate- or mixed-moderate-income households in 2018.
- Increase or rapid increase in housing costs or above regional median. change in Zillow home or rental values between 2-12-2018.
- Gentrified in 1990-2000 or 2000-2018.

Advanced Gentrification.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Marginal change, increase, or rapid increase in housing costs.
- Gentrified in 1990-2000 or 2000-2018.

Stable Moderate/Mixed Income.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.

At Risk of Becoming Exclusive.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Marginal change or increase in housing costs.

Becoming Exclusive.

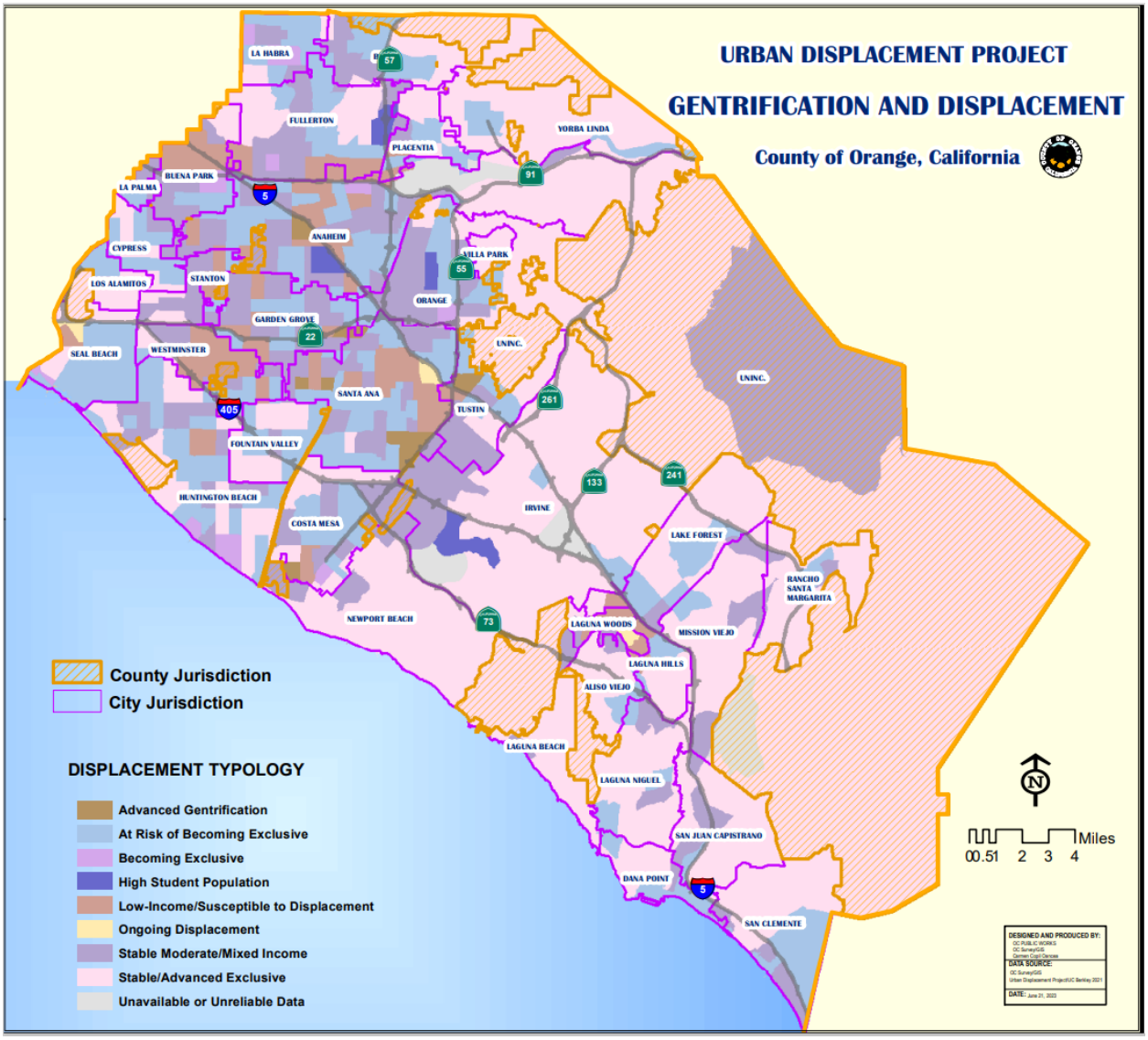
- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Rapid increase in housing costs.
- Absolute loss of low-income households, 2000-2018.
- Declining low-income in-migration rate, 2012-2018.
- Median income higher in 2018 than in 2000.

Stable/Advanced Exclusive.

- High-income tract in 2000 and 2018.
- Affordable to high or mixed high-income households in 2018.
- Marginal change, increase, or rapid increase in housing costs.

As **Figure 4-16** shows, Orange County as a region is made up of a variety of displacement risks with very high levels of exclusivity in the southern region of Orange County and higher occurrences of gentrification and displacement occurring in the central and northern regions of Orange County. It should be noted that **Figure 4-16** also shows a large area of stable/advanced exclusivity in the southeastern region, which is largely made up of undeveloped, mountainous land. However, the region surrounding Santa Ana through the northern portion of Orange County represents areas with lower median incomes and higher likelihood to experience displacement and gentrification.

Figure 4-16
Urban Displacement Project –
Gentrification and Displacement in Orange County



Source: Urban Displacement Project, University of California Berkeley (2021).

Preservation of Assisted Units at Risk of Conversion

Preservation of assisted units is an important goal for assuring that displacement is kept at a minimum. State Housing Element Law requires the analysis of government-assisted housing units that are eligible to convert from low-income housing to market rate housing during the next 10 years due to expiring subsidies, mortgage prepayments, or expiration of affordability restrictions, and identification of programs aimed at their preservation.

Use restrictions, as defined by State law, means any federal, state, or local statute, regulation, ordinance, or contract which as a condition of receipt of any housing assistance, including a rental subsidy, mortgage subsidy, or mortgage insurance, to an assisted housing development, establishes maximum limitations on tenant income as a condition of eligibility for occupancy.

The following section analyzes the potential conversion of assisted housing units to market rate housing.

Status of Covenants of Inventory of Affordable Housing Units Assisted by the County

Affordable covenants help to ensure that certain housing units remain affordable for an extended period of time. Covenants provide lasting affordable options to low and very low-income households in a community. **Table 4-32** below provides a list of 2,771 housing units with affordability covenants that received financial assistance from the County of Orange for their development. Of the units at-risk of converting to market-rate during the planning period, no units are located within the Unincorporated County areas; however, the County has maintained financial interest and support for the units at-risk and will continue to do so throughout the planning period.

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Assisted Units At-Risk of Converting to Market Rate During the Planning Period in Cities					
Canada & Marquita Apartments	143 West Marquita & 133—- 135 W. Canada San Clemente, CA 92672	HOME	12	12	11/4/2026
Village Heights Apartments	1621 Mesa Dr., Newport Beach, CA 92660	OCDA	75	25	4/1/2028
Assisted Units Not At-Risk During the Planning Period					
Pacific Terrace	15000 Pacific St., Midway City	Market-to-Market	98	97	2041*
Walnut Village Apartments	620 S. Walnut Ave., Brea, CA 92821	HOME	47	11	11/27/2036
Bishop Avenue	8142 Bishop Ave., Midway City, CA 92655	HOME	10	10	10/22/2038
Mercy House Scattered Houses	2426 Athens, Orange, CA 92867 9511 S. Mills, Anaheim, CA 92804 2106 W. Niobe, Anaheim, CA 92804 10882 MacMurray, Anaheim, CA 92804	NSP	4	4	2041-2043
Costa Mesa Village	2450 Newport Blvd., Costa Mesa, CA 92627	OCHA	96	95	5/11/2043
Walnut Court & Pixley Arms Apartments	Walnut: 1519 E. Walnut Ave. / Pixley: 537 W. Almond	OCHA	22	22	12/15/2047
Villa Camino Real	601-607-609 La Habra Blvd, Fullerton, CA	OCHA	12	23	5/4/2048
Inn at Woodbridge Apartments	11 Osborne, Irvine, CA 92604	OCHA	116	56	8/9/2049
Park Stanton Place Senior Apartments	7622 Katella Ave., Stanton, CA 90680	OCHA	335	67	12/20/2049
Irvine Inn (SRO)**	2810 Warner Avenue, Irvine, CA 92606	OCHA	192	39	6/23/2050
Woodpark Apartments	22702 Pacific Park Drive, Aliso Viejo, CA	OCHA	128	108	8/8/2050
Arroyo Vista Apartments	26196 Crown Valley Parkway, Mission Viejo, CA 92692	OCHA	156	76	10/21/2050
Fullerton City Lights SRO*	224 E. Commonwealth Ave., Fullerton, CA 92832	OCHA	136	116	4/23/2050
Esencia Norte Apartment Homes***	86 Esencia Dr., Ladera Ranch	MHRB	112	111	8/25/2051
Sendero Bluffs Senior Apartment Homes***	30472 Gateway Place, Rancho Mission Viejo	MHRB	107	106	8/25/2051
Camden Place Senior Apartments	4500 Montecito Drive, La Palma, CA 90623	HOME	35	11	9/22/2052
Plaza Court Apartments	11440 Court Street #4102, Stanton, CA 90680	CDBG	120	25	12/15/2052
El Modena Transitional Shelter	18662-18682 E. Pearl St., Orange, CA 92869	CDBG	6	5	3/25/2053
Vintage Canyon Senior Apartments	855 N. Brea Blvd., Brea, CA 92821	NSP/HOME	105	11	6/10/2053
Midway City SRO**	15161 Jackson St., Midway City, CA	HOME/OCDA	18	9	8/3/2053
Heritage Villas	26836 Oso Pkwy., Mission Viejo, CA 92691	HOME/OC BONDS	143	11/58	8/8/2053
Heritage Place at Tustin	1101 Sycamore Ave., Tustin, CA 92780	OCHA	54	53	11/1/2056
H.O.M.E.S. Inc.- Riley House	466 N Swidler Street, Orange, CA 92869	OPS RESERVE	6	6	7/10/2057
Vintage Shores	366 Camino De Estrella, San Clemente, CA	HOME	122	11	3/26/2058
Westminster Intergenerational	8140 13th St., Westminster, CA 92683	OCDA	86	85	4/5/2058
Linbrook Court	2240 W. Lincoln Ave., Anaheim, CA 928001	HOME	81	80	7/30/2058

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Mendocino at Talega I	123 Calle Amistad, San Clemente, CA 92673	HOME/OCDA	124	11/112	11/24/2058
Mendocino at Talega II	123 Calle Amistad, San Clemente, CA 92673	OCDA	62	62	11/24/2058
California Villas	935 S. Gilbert St., Anaheim, CA 92804	HOME	34	11	12/18/2058
Thomas House	12591 and 12601 Morningside Ave., Garden Grove, CA	CDBG	22	14	2/19/2059
Laurel Glen aka Ladera Ranch	70 Sklar St., Ladera Ranch	OCDA	220	44	2/23/2059
Casa Alegre	2761 W. Ball Rd., Anaheim, CA 92804	HOME	23	22	6/22/2059
Coventry Heights Senior Apartments	7521 Wyoming St., Westminster, CA 92683	GenFund	76	76	6/22/2059
Solara Court Apartments	3335 W. Lincoln Avenue, Anaheim, CA	HOME	132	131	10/24/2059
Jackson Aisle Apartments	15432 Jackson St., Midway City	OCDA	30	29	11/10/2059
Alice Court	450 Glenneyre Street, Laguna Beach, CA 92651	OCDA	27	13	11/19/2059
Escalones Nuevos	150 Escalones, San Clemente, CA	CDBG	6	6	2/24/2060
Casa de la Esperanza	10572 Knott Ave., Stanton, CA 90680	HOME	10	4	8/15/2060
Jasmine At Founders Village	17911 Bushard St, Fountain Valley, CA 92708	SPAHF	156	42	2/10/2061
Montecito Vista Apartment Homes	4000 El Camino Real, Irvine, CA	HOME/OCDA	162	11	6/21/2061
Ability First	14501 Harvard Ave., Irvine, CA 92606	HOME	24	11	9/28/2061
Laguna Canyon	400 Limestone, Irvine, CA 92603	OPS RESERVE	120	57	10/18/2061
Cornerstone Apartments	9541 Ball Rd., Anaheim, CA 92804	HOME/OCDA	48	11/37	4/6/2062
Windrow Apartments	5300 Trabuco Rd, Irvine, CA 92620	OCDA	96	47	6/22/2062
Dorado Senior Apartments	8622 Stanton Ave, Buena Park, CA 90620	HOME/OCDA	150	11/103	9/17/2062
Woodbury Walk Apartments	99 Talisman, Irvine, CA 92620	HOME/OCDA	150	73	5/8/2063
Stonegate I (Anaheim)	9051 W. Katella Ave., Anaheim, CA 92804	HOME/OCDA	37	11	9/9/2064
Stonegate II (Anaheim-Katella)	8911 W. Katella Ave., Anaheim, CA 92804	HOME/OCDA	26	11	9/9/2064
Diamond Aisle	1310 W. Diamond St., Anaheim, CA 92801	MHSA	25	24	12/22/2064
Granite Court	2853 Kelvin Ave., Irvine, CA 92614	HOME/OCDA	71	11/24	2/9/2065
Bonterra Apartment Homes	401 Discovery Lane, Brea, CA 92812	HOME/OCDA	94	82/11	7/1/2065
Doria II—- Stonegate Irvine Families	1000 Crested Bird, Irvine, CA 92614	HOME/OCDA	74	37	1/9/2066
Buena Vista Apartments	16437 E. Buena Vista St., Orange, CA 92865	HOME/OCDA	17	11/6	3/14/2066
Calle del Cerro	1042 Calle Del Cerro #201 1050 Calle Del Cerro #604 1052 Calle Del Cerro #712 1064 Calle Del Cerro #1303	NSP	4	4	6/16/2066
Doria I—- Stonegate Irvine Families	1000 Crested Bird, Irvine, CA 92614	HOME/MHSA	60	29	9/3/2066
Avenida Villas Families	9602 W Ball Rd., Anaheim, CA 92804	HOME/OCDA	29	11/17	11/7/2066
Birch Hills	255 S. Kraemer Blvd., Brea, CA 92821	HOME	114	11/45	6/21/2067
Cotto"s Point	2358 S El Cami Real, San Clemente, CA 92672	HOME	75	27	7/1/2067
8329 Lola Avenue, Stanton, CA 90680	8329 Lola Avenue, Stanton, CA 90680	HOME-SFR/HSA	1	1	8/4/2069
283 Laurel Avenue, Brea, CA, 92821	283 Laurel Avenue, Brea, CA, 92821	HOME-SFR/HSA	1	1	8/13/2069
802 Mathewson Avenue, Placentia, CA 92970	802 Mathewson Avenue, Placentia, CA 92970	HOME-SFR/HSA	1	1	9/23/2069
Oakcrest Heights	22733 Oakcrest Circle, Yorba Linda, CA 92887	HOME/HAS	54	11/3	6/15/2072

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Potters Lane	15171 Jackson St., Midway City	HSA	16	15	11/21/2073
Placentia Veterans Village	1945 East Veterans Way, Placentia, CA 92870	HAS	50	24	12/20/2073

**Pacific Terrace has renewed their Market-to-Market contract which expired on 10/31/2021. The development is now preserved through 2041.*
***The Census does not define SROs as individual units as residents share facilities. However, the County tracts SRO covenants and has therefore included them as part of this analysis.*
**** County owned land as part of the Ranch Affordable Housing Implementation Agreement; once the projects reach the 15 year expiration of the tax credits/bonds the property will be transferred to the County.*
Source: OC Community Resources – Housing & Community Development

Contributing Factors to Disproportionate Housing Needs and Displacement

A number of factors influence the disproportionate housing needs identified above and create a risk of displacement for lower-income households. As **Figure 4-16** demonstrates, a large portion of Orange County as a whole are now established/exclusive areas. Within the Unincorporated County areas, there is a mix, with some pockets that are either established middle-income areas, at risk of becoming exclusive, or are susceptible to or have ongoing displacement. The Unincorporated County areas specifically appear to have a mismatch between the demand for larger affordable units and the available affordable units, as well as (similar to the rest of Orange County) high housing costs. The specific factors which contribute to disproportionate housing needs within the Unincorporated County areas are:

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of affordable housing
- Source of income discrimination

Discussion of Site Inventory Related to People with Protected Characteristics, Lower Incomes, and Opportunity Areas

California Assembly Bill 686 (AB 686) requires that jurisdictions identify candidate housing 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 candidate housing sites in **Table B-8** *Orange County Candidate Housing Site Inventory*, 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.

Selection of candidate housing sites take into consideration access to vital goods, services, and public transportation, and are therefore ideal areas for the County to focus much of its future housing growth. It is anticipated that accessory dwelling unit (ADU) production will occur in the lower density areas of the community.

Approximately 34% of persons from all racial groups in the Unincorporated County areas identify ethnically as Hispanic or Latino. Over 93% of candidate housing sites are located in areas that have equal to or less than 40% of the population identifying as Hispanic or Latino.

The data in **Figures 4-17, 4-20, 4-21, 4-22, 4-23, 4-24, 4-25, 4-26, 4-27, 4-28, 4-29, 4-30** identify the candidate housing sites to accommodate future housing in the County, overlaid on demographics data using AFFH data layers for segregation and integration and access to opportunities provided through HCD data and mapping resources. The data demonstrates that the candidate sites are well located throughout Unincorporated County areas to serve its diverse population.

Candidate Sites and Non-White Population

The distribution of RHNA units by racial/ethnic minority population at the tract level is shown in **Table 4-33** and **Figure 4-17**. As discussed previously, tracts with larger racial/ethnic minority populations tend to be located predominantly in the Central and Northern Orange County areas. Of the sites with units identified to meet the RHNA, 61% are in tracts where 21% to 40% of the population belongs to a racial/ethnic minority group, 13.3% are in tracts where 41% to 60% of the population belongs to a racial/ethnic minority group, 18.8% are in tracts where 61% to 80% of the population belongs to a racial/ethnic minority group, and 6.9% are in tracts where more than 80% of the population belongs to a racial/ethnic minority group. A larger proportion of units allocated towards the lower-income RHNA are in tracts where more than 60% of the population belongs to a racial/ethnic minority group (51.2%) compared to moderate-income units (15.3%) and above-moderate-income units (0.1%).

Table 4-33
Sites Inventory by Racial/Ethnic Minority Population

Racial/Ethnic Minority Population (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
21-40%	1593	32.0%	1476	74.0%	3718	89.8%	6787	61.0%
41-60%	840	16.9%	215	10.8%	420	10.1%	1475	13.3%
61-80%	1928	38.7%	157	7.9%	4	0.1%	2089	18.8%
>80%	622	12.5%	147	7.4%	0	0.0%	769	6.9%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable racial/ethnic minority populations within a single population range (i.e., there are multiple tracts containing RHNA units with racial/ethnic minority populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with racial/ethnic minority populations in this range).

The distribution of RHNA units can also be shown by CDP and Unincorporated tract. Sites identified to meet the County's RHNA are located in the following CDPs or tracts (if not within a specific CDP). CDPs and Unincorporated tracts containing RHNA sites are also shown in **Figure 4-18** and **Figure 4-19**.

- Rossmoor (North Orange County)
- Midway City (Central Orange County)
- North Tustin (Central Orange County)
- Coto de Caza (South Orange County)
- Ladera Ranch (South Orange County)
- Las Flores (South Orange County)
- Rancho Mission Viejo (South Orange County)
- Silverado (South Orange County)
- Trabuco Canyon (South Orange County)
- Tract 218.16 – North Orange County, between Placentia and Yorba Linda
- Tract 218.25 – North Orange County, east of Yorba Linda
- Tract 219.13 – North Orange County, east of Orange and north of Tustin
- Tract 756.04 – North Orange County, east of Orange and north of Tustin
- Tract 762.01 – North Orange County, north of Orange
- Tract 762.02 – North Orange County, north of Orange
- Tract 871.01 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 877.01 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 877.03 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 878.05 – North Orange County, north of Garden Grove and west of Anaheim

- Tract 878.06 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 626.45 – Central Orange County, northeast of Newport Beach and adjacent to UCI
- Tract 992.27 – Central Orange County, between Fountain Valley and Santa Ana
- Tract 320.11 – South Orange County, along northern County border and north of Rancho Santa Margarita

In the North County, tracts 218.25, 219.13, 756.04, 762.01, and 762.02 have the highest concentration of RHNA units. These tracts are in the northeastern corner of the North County area. Tracts in the northern Unincorporated County generally have larger proportions of non-White residents compared to the Central and South County areas. Unincorporated Midway City in the Central County has the largest proportion of RHNA units, totaling 2,043 units (1,907 lower-income, 132 moderate-income, and 4 above-moderate-income). Tracts in Midway City have racial/ethnic minority populations ranging from 76.5% to 97.3%.

In South Orange County, Rancho Mission Viejo (in the Unincorporated County) has the largest proportion of RHNA units (165 lower-income, 1,000 moderate-income, and 3,001 above-moderate-income). Consistent with the trend throughout South Orange County, only 37.5% of persons in the Rancho Mission Viejo tract containing RHNA units belong to a racial or ethnic minority group.

Table 4-34
Sites Inventory by Racial/Ethnic Minority Population – CDP and Unincorporated Tract

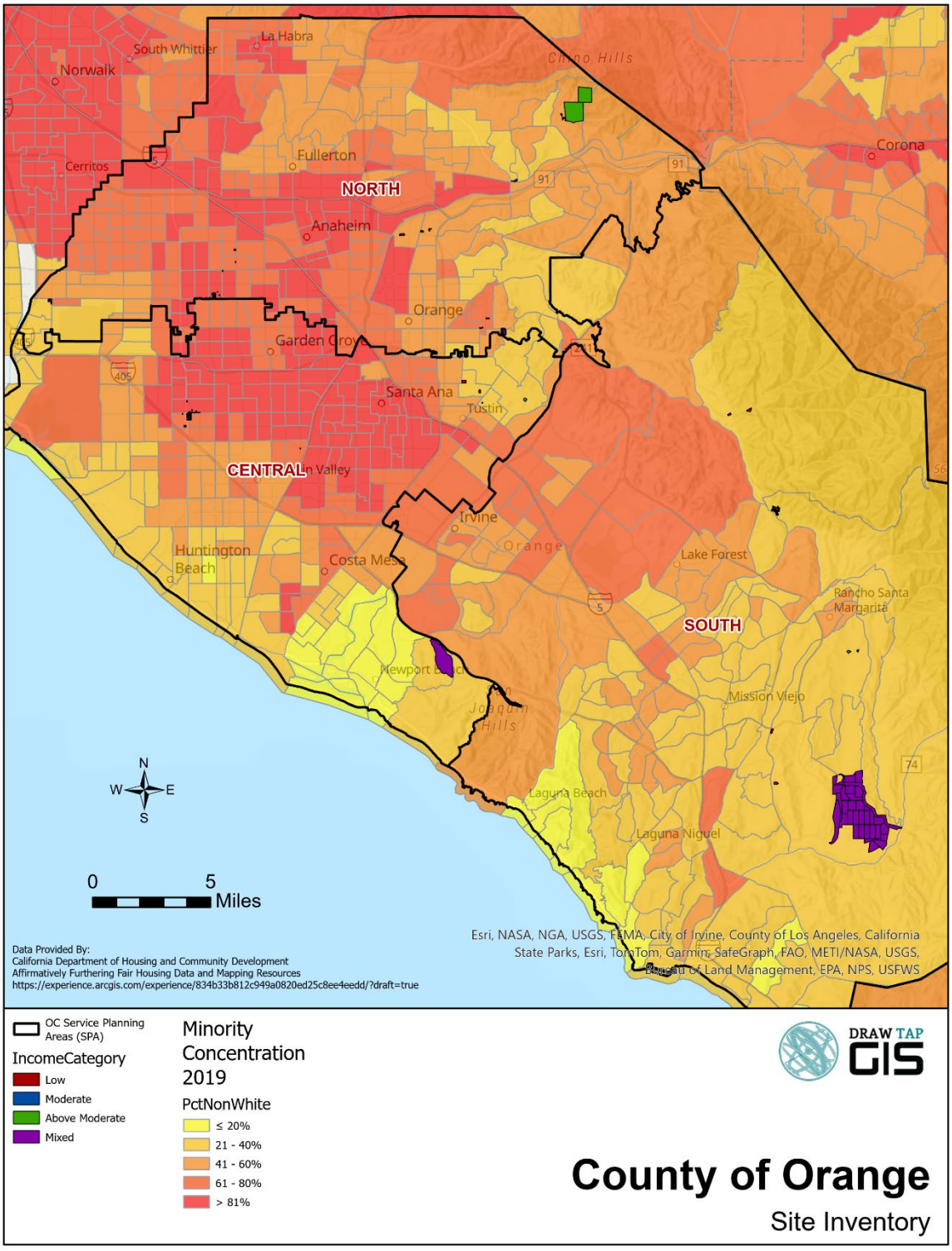
Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% Non-White Pop.
Northern Unincorporated County					
Rossmoor	525	188	0	713	36.4%
Tract 218.16	130	0	44	174	34.2%
Tract 218.25	0	0	420	420	41.0%
Tract 219.13	302	26	0	328	76.1%
Tract 756.04	351	164	0	515	30.3%
Tract 762.01	409	215	0	624	55.6%
Tract 762.02	431	0	0	431	57.4%
Tract 871.01	177	0	0	177	74.7%
Tract 877.01	0	36	0	36	74.0%
Tract 877.03	50	0	0	50	81.2%
Tract 878.05	0	31	0	31	82.5%
Tract 878.06	114	48	0	162	86.0%
Central Unincorporated County					

Table 4-34
Sites Inventory by Racial/Ethnic Minority Population – CDP and Unincorporated Tract

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% Non-White Pop.
Midway City	1907	132	4	2043	76.5% - 87.3%
North Tustin	45	0	63	108	30.0% - 36.2%
Tract 626.45	62	124	432	618	25.2%
Tract 992.27	0	31	0	31	74.3%
Southern Unincorporated County					
Coto de Caza	0	0	113	113	21.5% – 22.1%
Ladera Ranch	30	0	0	30	37.5%
Las Flores	60	0	0	60	37.5%
Rancho Mission Viejo	165	1000	3001	4166	37.5%
Silverado	180	0	0	180	21.8%
Trabuco Canyon	0	0	65	65	28.9%
Tract 320.11	45	0	0	45	21.8%

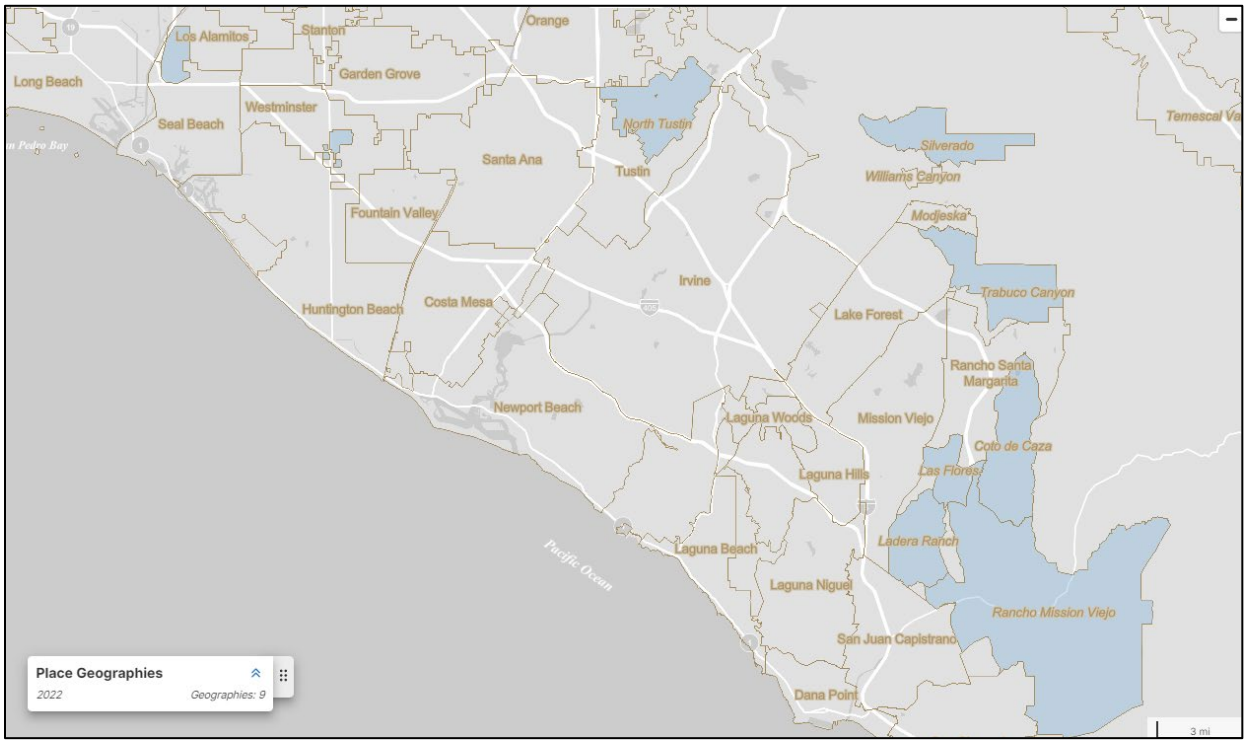
Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).

Figure 4-17
Distribution of RHNA Sites and Racial/Ethnic Minority Population by Tract



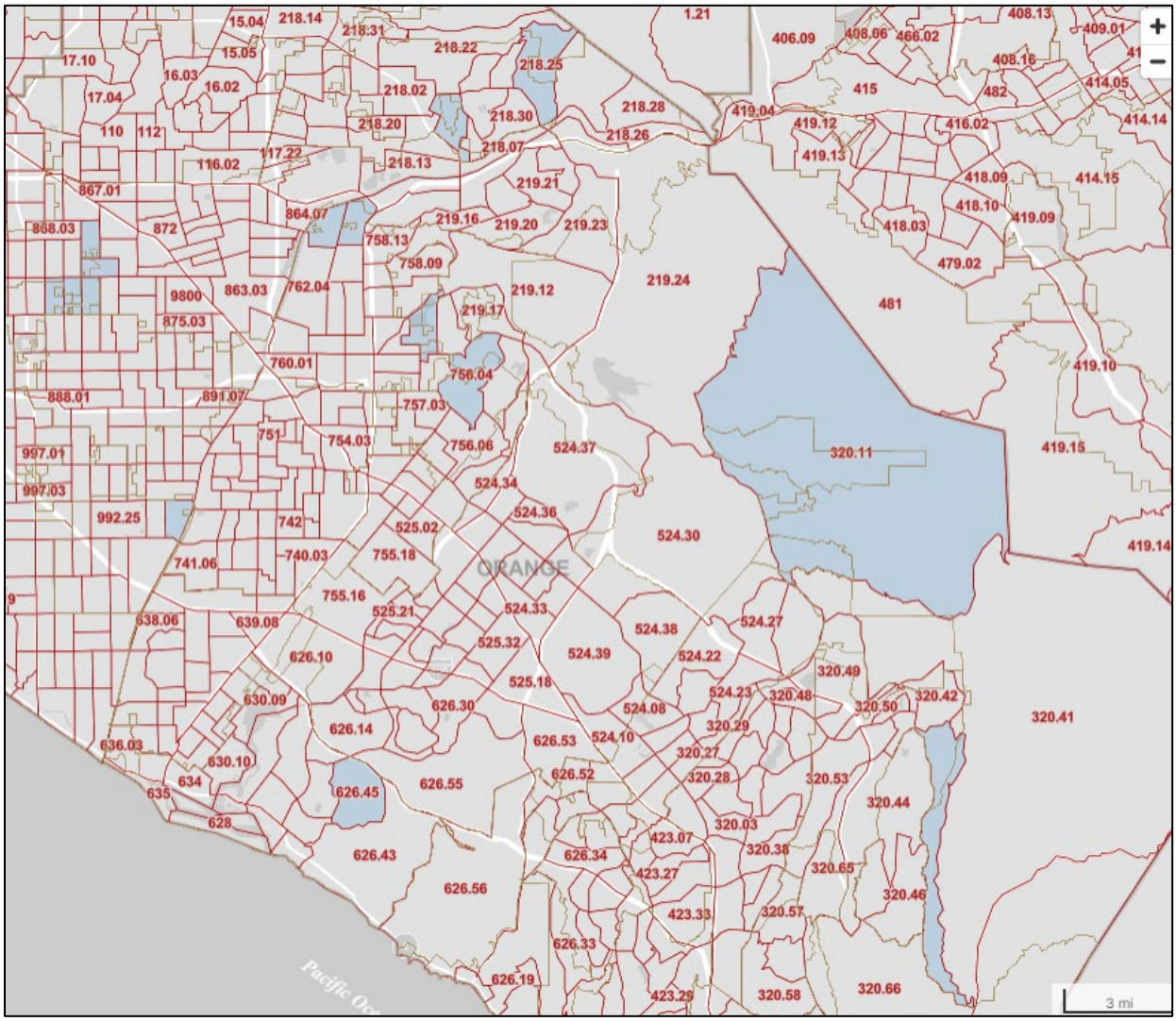
Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).

Figure 4-18
Unincorporated CDPs



Source: US Census Bureau, 2022 American Community Survey.

Figure 4-19
Unincorporated Area Tracts



Source: US Census Bureau, 2022 American Community Survey.

Candidate Sites and Persons with Disabilities

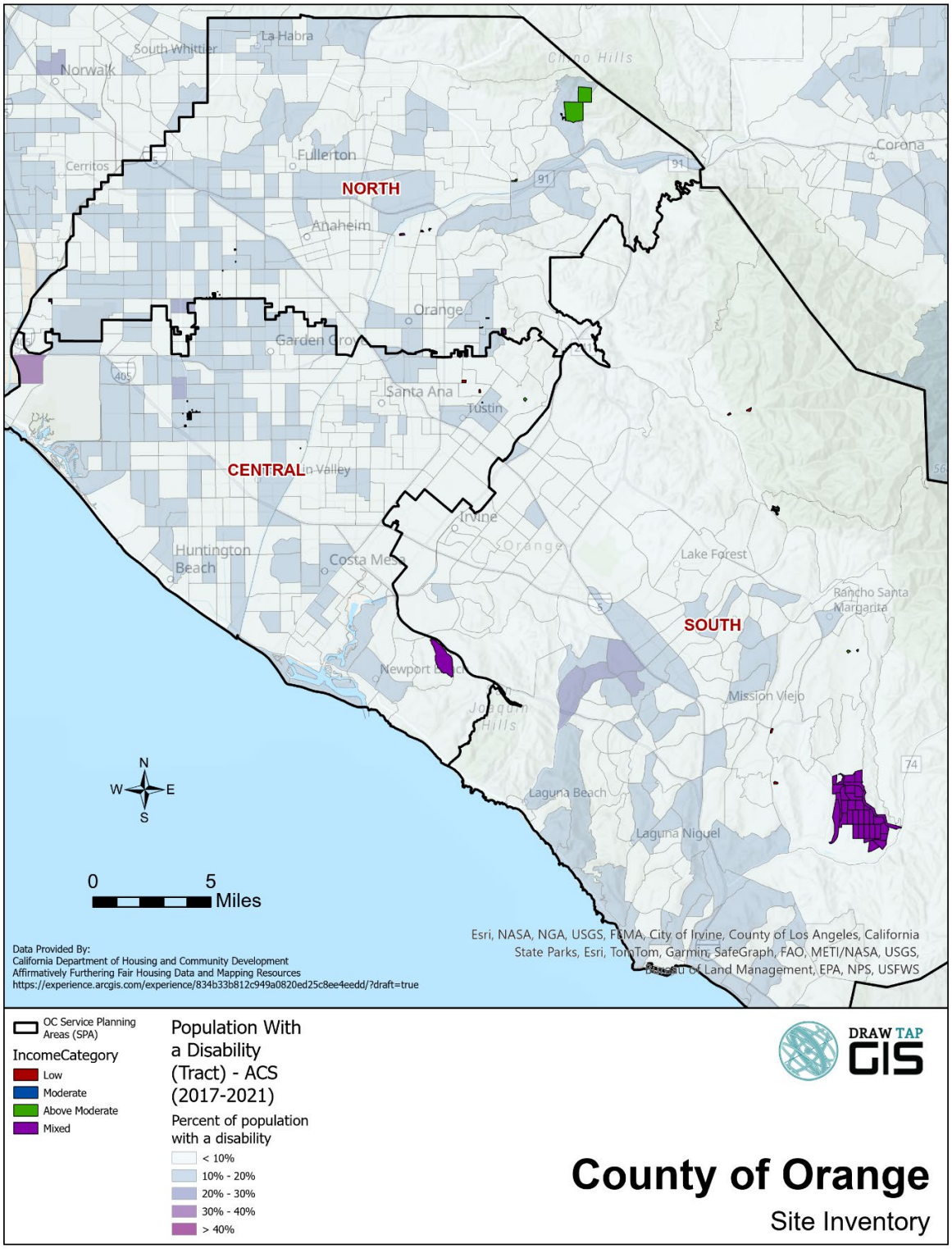
The distribution of RHNA units by populations of persons with disabilities is shown in **Table 4-35** and **Figure 4-20**. Consistent with the countywide trend, there are no RHNA sites located in tracts where more than 20% of the population experiences a disability. Approximately 74% of units are in tracts where less than 10% of the population experiences a disability. The remaining 26% are in tracts where between 10% to 20% of the population experiences a disability. A larger proportion of lower-income RHNA units are in tracts where more than 10% of persons experience a disability (44.3%) compared to moderate-income units (11.3%) and above-moderate-income units (10.5%).

Table 4-35
Sites Inventory by Population of Persons with Disabilities

Persons with Disabilities (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<10%	2774	55.7%	1770	88.7%	3708	89.5%	8252	74.2%
10-20%	2209	44.3%	225	11.3%	434	10.5%	2868	25.8%
20-30%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
30-40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable disabled populations within a single population range (i.e., there are multiple tracts containing RHNA units with disabled populations below 10%. The RHNA units shown are the summation of all units in various Unincorporated tracts with disabled populations in this range).

Figure 4-20
Distribution of RHNA Sites and Persons with Disabilities by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Candidate Sites and Familial Status

The distribution of RHNA units by population of children residing in married couple households is presented in **Table 4-36** and **Figure 4-21**. In general, North and Central Orange County have more tracts with smaller proportions of children in married couple households compared to South Orange County. Nearly all RHNA units are in tracts where more than 60% of children reside in married couple households. Approximately 0.4% of units, totaling 50 units, are in a tract where only 55% of children reside in married couple households. All 50 units located in this tract are allocated towards the lower-income RHNA.

Additionally, more lower-income RHNA units are in tracts where 60% to 80% of children are in married couple households (71.6%) compared to moderate- (22.3%) and above-moderate- (10.5%) income units. The remaining 27.4% of lower-income RHNA units, 77.7% of moderate-income units, and 89.5% of above-moderate-income units are in tracts where more than 80% of children live in married-couple households.

RHNA units and sites are shown by population of children residing in single-parent female-headed households in **Table 4-37** and **Figure 4-22**. Less than 40% of children live in female-headed households in most Orange County tracts. There are no RHNA sites located in tracts where more than 40% of children are in single-parent female-headed households. However, a larger proportion of moderate- (93.4%) and above-moderate- (99.7%) income units are in tracts where less than 20% of children reside in female-headed households compared to lower-income units (65.4%). The remaining 34.6% of lower-income units, 6.6% of moderate-income units, and 0.3% of above-moderate-income units are in tracts where 20% to 40% of children reside in female-headed households.

Table 4-36
Sites Inventory by Children in Married Couple Households

Children in Married Couple Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
40-60%	50	1.0%	0	0.0%	0	0.0%	50	0.4%
60-80%	3567	71.6%	444	22.3%	434	10.5%	4445	40.0%
>80%	1366	27.4%	1551	77.7%	3708	89.5%	6625	59.6%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

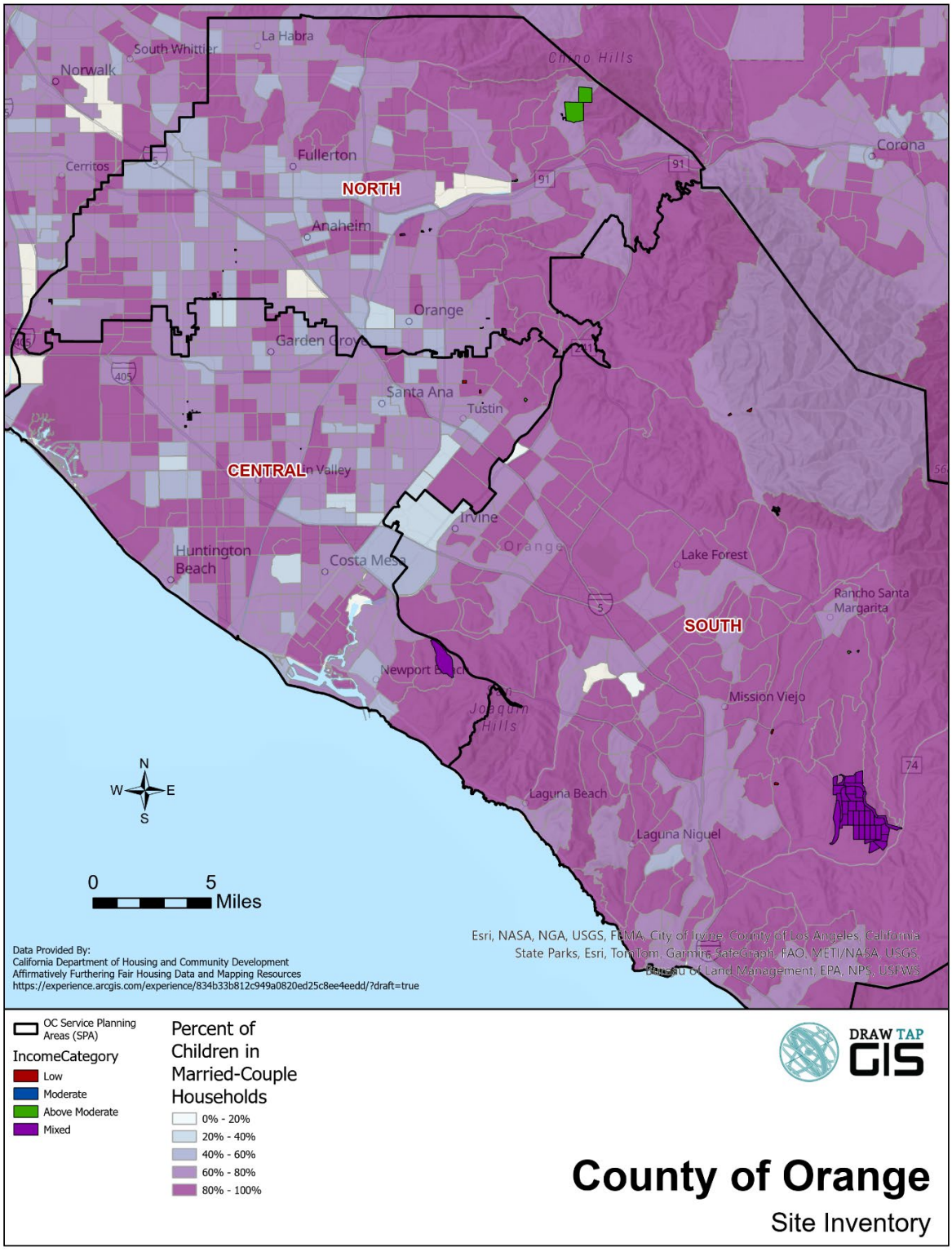
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable populations of children in married couple households within a single population range (i.e., there are multiple tracts containing RHNA units with populations of children in married couple households below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with populations of children in married couple households in this range).

Table 4-37
Sites Inventory by Children in Female-Headed Households

Children in Female-Headed Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	3259	65.4%	1864	93.4%	4128	99.7%	9251	83.2%
20-40%	1724	34.6%	131	6.6%	14	0.3%	1869	16.8%
40-60%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
60-80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

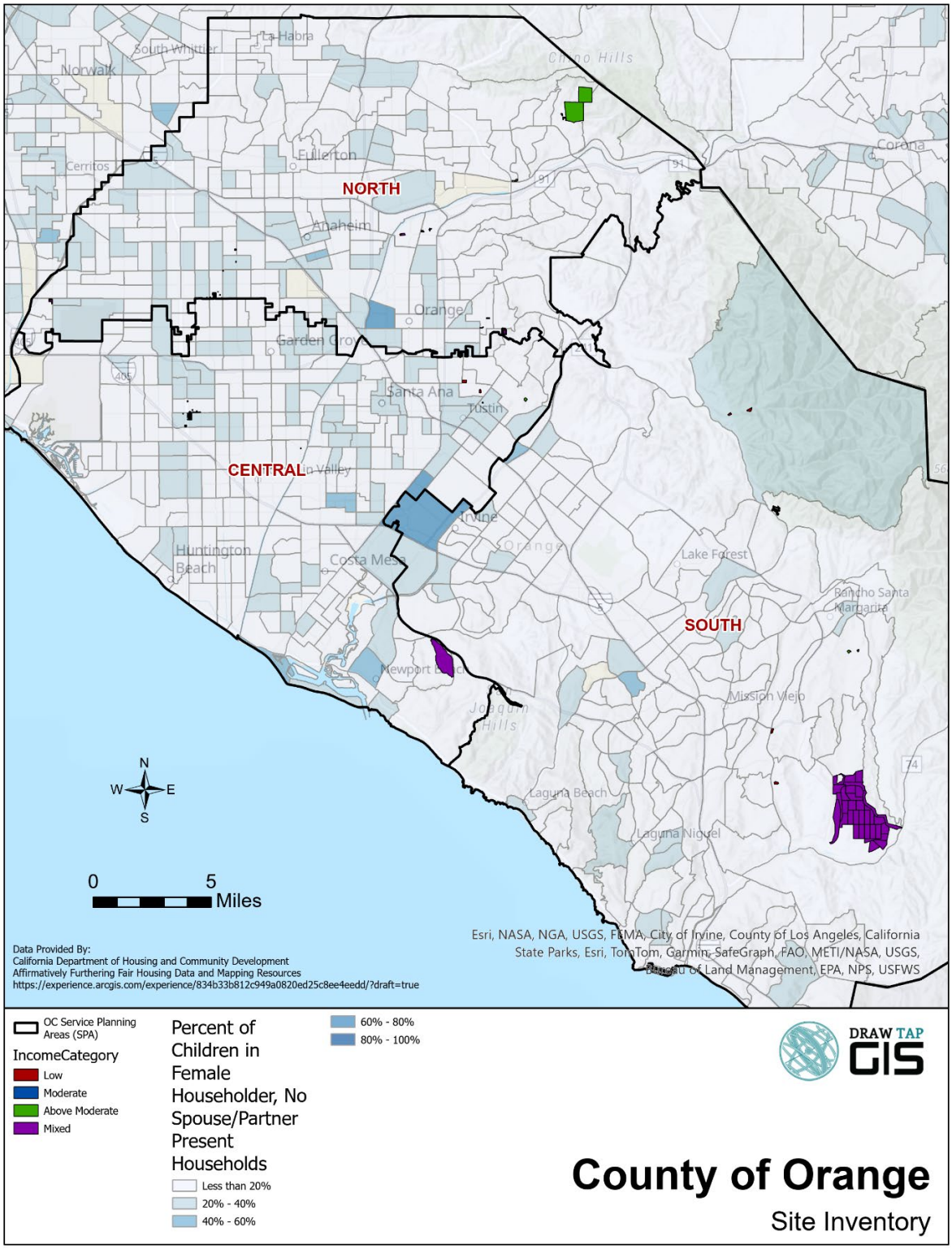
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable populations of children in female-headed households within a single population range (i.e., there are multiple tracts containing RHNA units with populations of children in female-headed households below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with populations of children in female-headed households in this range).

Figure 4-21
Distribution of RHNA Sites and Children in Married Couple Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Figure 4-22
Distribution of RHNA Sites and Children in Female-Headed Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Candidate Sites and Low- and Moderate- Income

The distribution of RHNA units by LMI household population is shown in **Table 4-38** and **Figure 4-23**. As shown in **Figure 4-23**, block groups with larger LMI household populations are generally more concentrated in the North and Central Orange County areas. Of the units selected to meet the RHNA, 61.8% are in block groups that are considered LMI areas, where more than 50% of households have low or moderate incomes. A larger proportion of units allocated towards the above-moderate-income RHNA are in LMI areas (72.5%) compared to moderate-income units (65.4%) and lower-income units (51.5%).

Table 4-38
Sites Inventory by Population of LMI Households

LMI Households (Block Group)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<25%	1399	28.1%	476	23.9%	1002	24.2%	2877	25.9%
25-50%	1016	20.4%	215	10.8%	135	3.3%	1366	12.3%
50-75%	2047	41.1%	1179	59.1%	3005	72.5%	6231	56.0%
75-100%	521	10.5%	125	6.3%	0	0.0%	646	5.8%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).
Note: Population is based on the block group-level data where each site is located. Block groups with RHNA sites have LMI household populations within a single population range (i.e., there are multiple block groups containing RHNA units with LMI household populations of below 25%. The RHNA units shown are the summation of all units in various Unincorporated block groups with LMI household populations in this range).

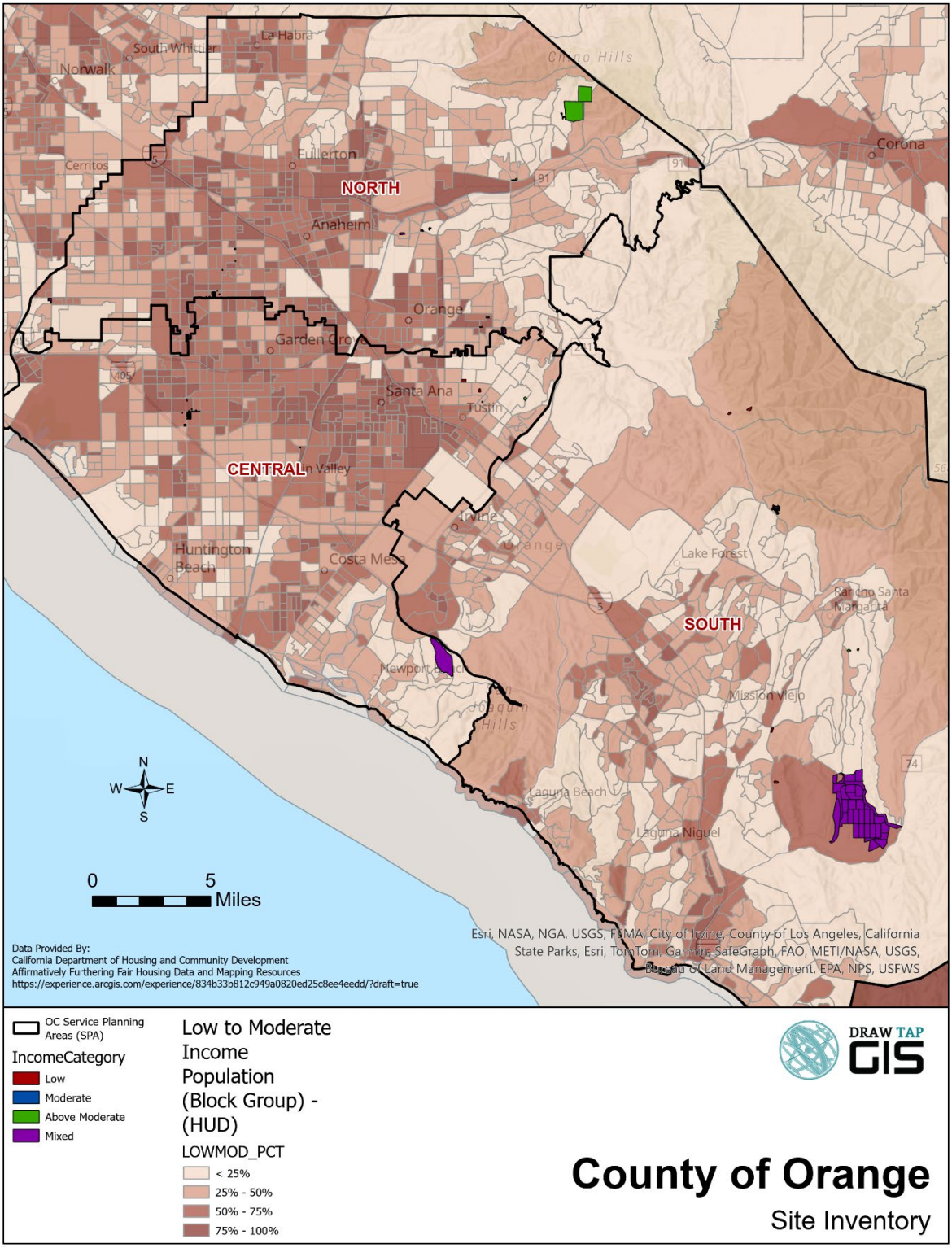
The distribution of RHNA units by CDP or Unincorporated County tract is presented in **Table 4-39**. As discussed above, in the North County, tracts 218.25, 219.13, 756.04, 762.01, and 762.02 have the largest concentrations RHNA units. These tracts have LMI household populations of 17.2%, 79.2%, 9.5%, 49.2%, and 20.6%, respectively. These tracts, with the exception of tract 219.13, generally have lower LMI populations compared to other areas in the North County. Tract 219.13 is located north of the City of Orange. There are 2,043 RHNA units identified in Midway City in the Central County area. Tracts in Unincorporated Midway City have LMI populations ranging from 62% to 83.3%. LMI populations in Unincorporated Midway City are higher than other CDPs/tracts in the Central Unincorporated County area containing RHNA units. Unincorporated Rancho Mission Viejo in the South Unincorporated County area has the largest proportion of RHNA units and an LMI population of 60%.

Table 4-39
Sites Inventory by Population of LMI Households – CDP and Unincorporated Tract

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% LMI Households
Northern Unincorporated County					
Rossmoor	525	188	0	713	21.7%
Tract 218.16	130	0	44	174	42.6%
Tract 218.25	0	0	420	420	17.2%
Tract 219.13	302	26	0	328	79.2%
Tract 756.04	351	164	0	515	9.5%
Tract 762.01	409	215	0	624	49.2%
Tract 762.02	431	0	0	431	20.6%
Tract 871.01	177	0	0	177	32.1%
Tract 877.01	0	36	0	36	71.0%
Tract 877.03	50	0	0	50	72.7%
Tract 878.05	0	31	0	31	74.5%
Tract 878.06	114	48	0	162	71.8%
Central Unincorporated County					
Midway City	1907	132	4	2043	62.0% - 83.3%
North Tustin	45	0	63	108	20.5% - 44.3%
Tract 626.45	62	124	432	618	6.9%
Tract 992.27	0	31	0	31	79.6%
Southern Unincorporated County					
Coto de Caza	0	0	113	113	7.4% - 24.2%
Ladera Ranch	30	0	0	30	60.0%
Las Flores	60	0	0	60	35.6%
Rancho Mission Viejo	165	1000	3001	4166	60.0%
Silverado	180	0	0	180	46.0%
Trabuco Canyon	0	0	65	65	26.5%
Tract 320.11	45	0	0	45	46.0%

Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).

Figure 4-23
Distribution of RHNA Sites and LMI Household Populations by Block Group



Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).

Candidate Sites and R/ECAPs

There are a few Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) within the center of Orange County; however, the proposed candidate sites do not fall within any of the identified R/ECAPs and none are located in any Unincorporated County areas. There are also no RHNA units located in any TCAC areas of high segregation and poverty.

Candidate Sites and RCAAs

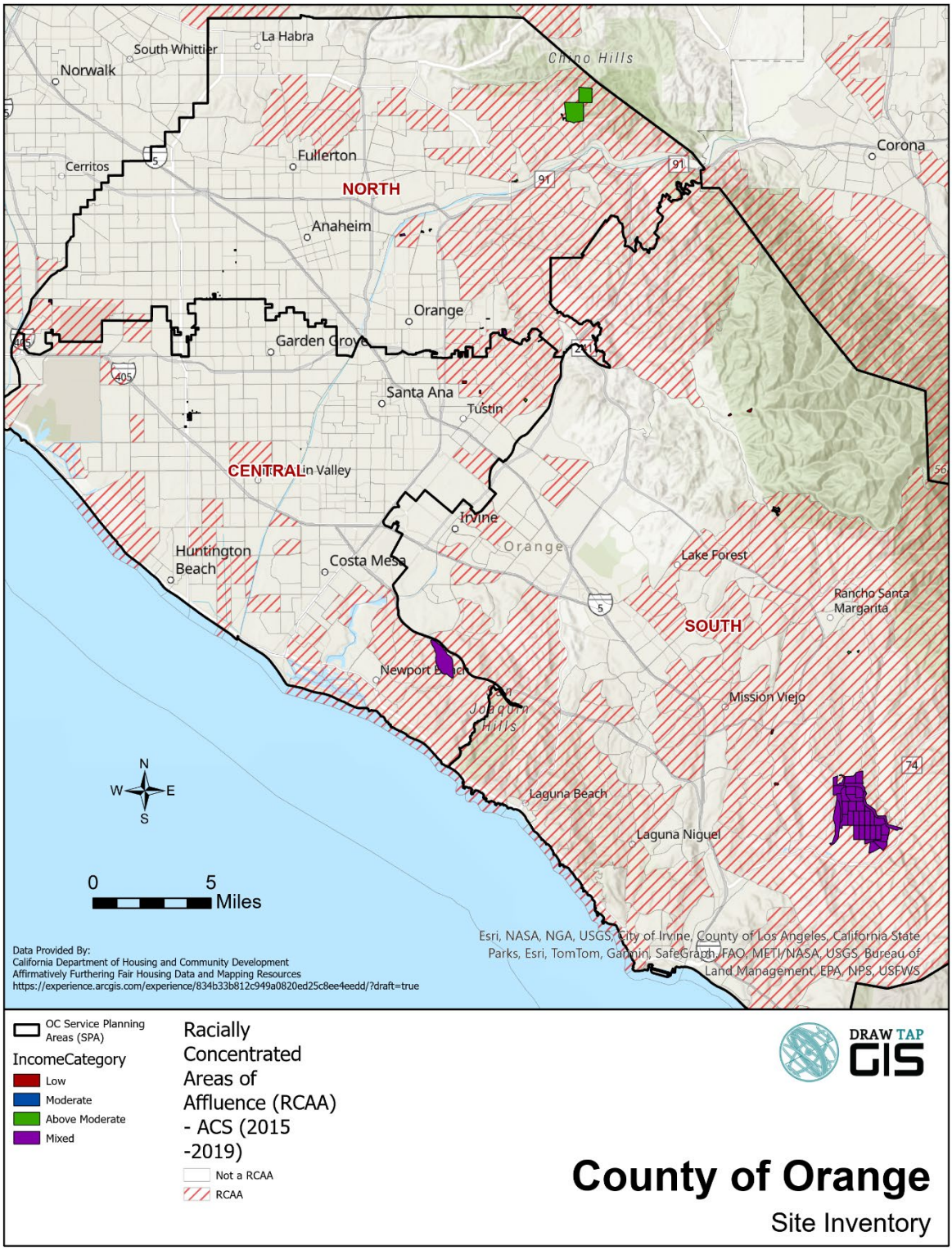
Table 4-40 and **Figure 4-24** show the distribution of units identified to meet the RHNA by RCAAs. As shown in **Figure 4-24**, a large proportion of Orange County, especially South Orange County, is considered an RCAA. Of the units identified to meet the RHNA, 68.4% are in RCAA tracts, including 35.7% of lower-income units, 84.8% of moderate-income units, and 99.9% of above-moderate-income units.

Table 4-40
Sites Inventory by RCAAs

RCAAs (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
RCAA	1777	35.7%	1691	84.8%	4138	99.9%	7606	68.4%
Not an RCAA	3206	64.3%	304	15.2%	4	0.1%	3514	31.6%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on HCD 2019 RCAAs).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified as RCAAs (i.e., there are multiple tracts containing RHNA units that are RCAAs. The RHNA units shown are the summation of all units in various Unincorporated tracts that are RCAAs).

Figure 4-24
Sites Inventory and RCAAs



Source: HCD AFFH Data Viewer 2.0 (based on HCD 2019 RCAAs).

Candidate Sites and TCAC/HCD Opportunity AreasMost of South Orange County, the coastal areas of Central Orange County, and the northern areas of North Orange County are considered the highest resource areas. As shown in **Table 4-41** and **Figure 4-25**, there are no RHNA units in low resource areas or areas of high segregation and poverty. Most RHNA units (64.8%) are in highest resource tracts, followed by high resource tracts (26.1%), and moderate resource tracts (9.1%). A larger proportion of moderate- and above-moderate-income units are in highest resource tracts (74% and 99.9%, respectively), compared to lower-income units (32%). Conversely, a larger proportion of units identified to meet the lower-income RHNA are in moderate resource tracts (16%) compared to moderate-income units (10.7%) and above-moderate-income units (0%).

Table 4-41
Sites Inventory by TCAC Opportunity Area

TCAC Opportunity Area Category (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
Highest Resource	1593	32.0%	1476	74.0%	4138	99.9%	7207	64.8%
High Resource	2591	52.0%	305	15.3%	4	0.1%	2900	26.1%
Moderate Resource	799	16.0%	214	10.7%	0	0.0%	1013	9.1%
Low Resource	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Area of High Segregation and Poverty	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified by a TCAC opportunity area category (i.e., there are multiple tracts containing RHNA units that are Highest Resource Areas. The RHNA units shown are the summation of all units in various Unincorporated tracts that are Highest Resource Areas).

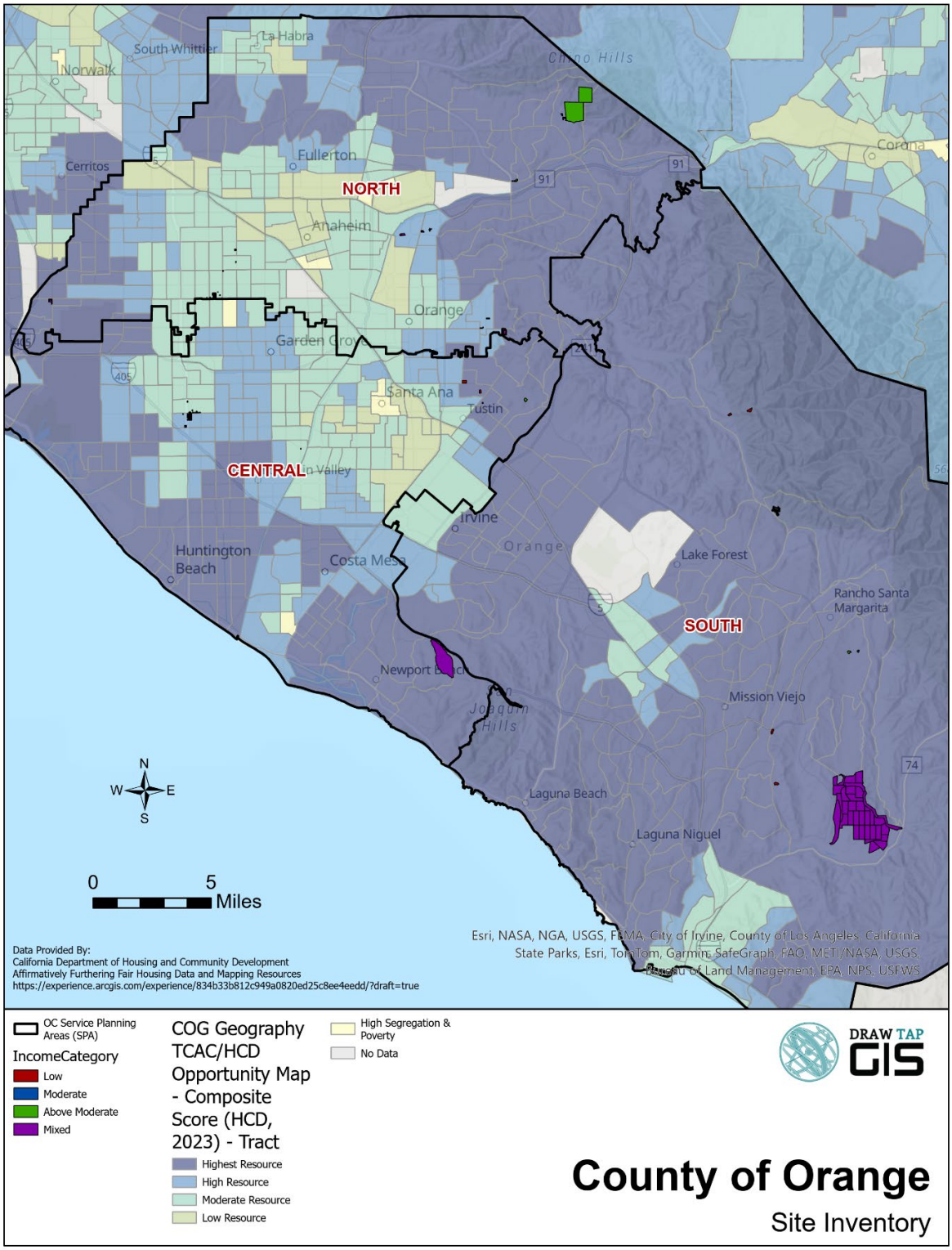
The distribution of RHNA units by TCAC Opportunity Area and CDP/tract is presented in **Table 4-42**. In the North County, opportunities to accommodate more than 500 RHNA units have been identified in Rossmoor, tract 756.04, and tract 762.01. These are all highest or high resource areas. Only 456 of the total 2,800 RHNA units in the North County (16.3%) are in moderate resource areas. There are no RHNA units in the North County in low resource areas or areas of high segregation and poverty. There are also no RHNA units in low resource areas or areas of high segregation and poverty in the Central or South County areas. Sites accommodating 2,043 units have been identified in Midway City (Central County), which is comprised of moderate and high resource tracts. In the South County, all RHNA units are in highest resource areas.

Table 4-42
Sites Inventory by TCAC Opportunity Area – CDPs and Unincorporated Tracts

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	TCAC Opportunity Area
Northern Unincorporated County					
Rossmoor	525	188	0	713	Highest Resource
Tract 218.16	130	0	44	174	Highest Resource
Tract 218.25	0	0	420	420	Highest Resource
Tract 219.13	302	26	0	328	High Resource
Tract 756.04	351	164	0	515	Highest Resource
Tract 762.01	409	215	0	624	High Resource
Tract 762.02	431	0	0	431	High Resource
Tract 871.01	177	0	0	177	Moderate Resource
Tract 877.01	0	36	0	36	Moderate Resource
Tract 877.03	50	0	0	50	Moderate Resource
Tract 878.05	0	31	0	31	Moderate Resource
Tract 878.06	114	48	0	162	Moderate Resource
Central Unincorporated County					
Midway City	1907	132	4	2043	Moderate/High Resource
North Tustin	45	0	63	108	Highest Resource
Tract 626.45	62	124	432	618	Highest Resource
Tract 992.27	0	31	0	31	Moderate Resource
Southern Unincorporated County					
Coto de Caza	0	0	113	113	Highest Resource
Ladera Ranch	30	0	0	30	Highest Resource
Las Flores	60	0	0	60	Highest Resource
Rancho Mission Viejo	165	1000	3001	4166	Highest Resource
Silverado	180	0	0	180	Highest Resource
Trabuco Canyon	0	0	65	65	Highest Resource
Tract 320.11	45	0	0	45	Highest Resource

Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).

Figure 4-25
Distribution of RHNA Sites and TCAC Opportunity Area by Tract



Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).

Candidate Sites and CalEnviroScreen

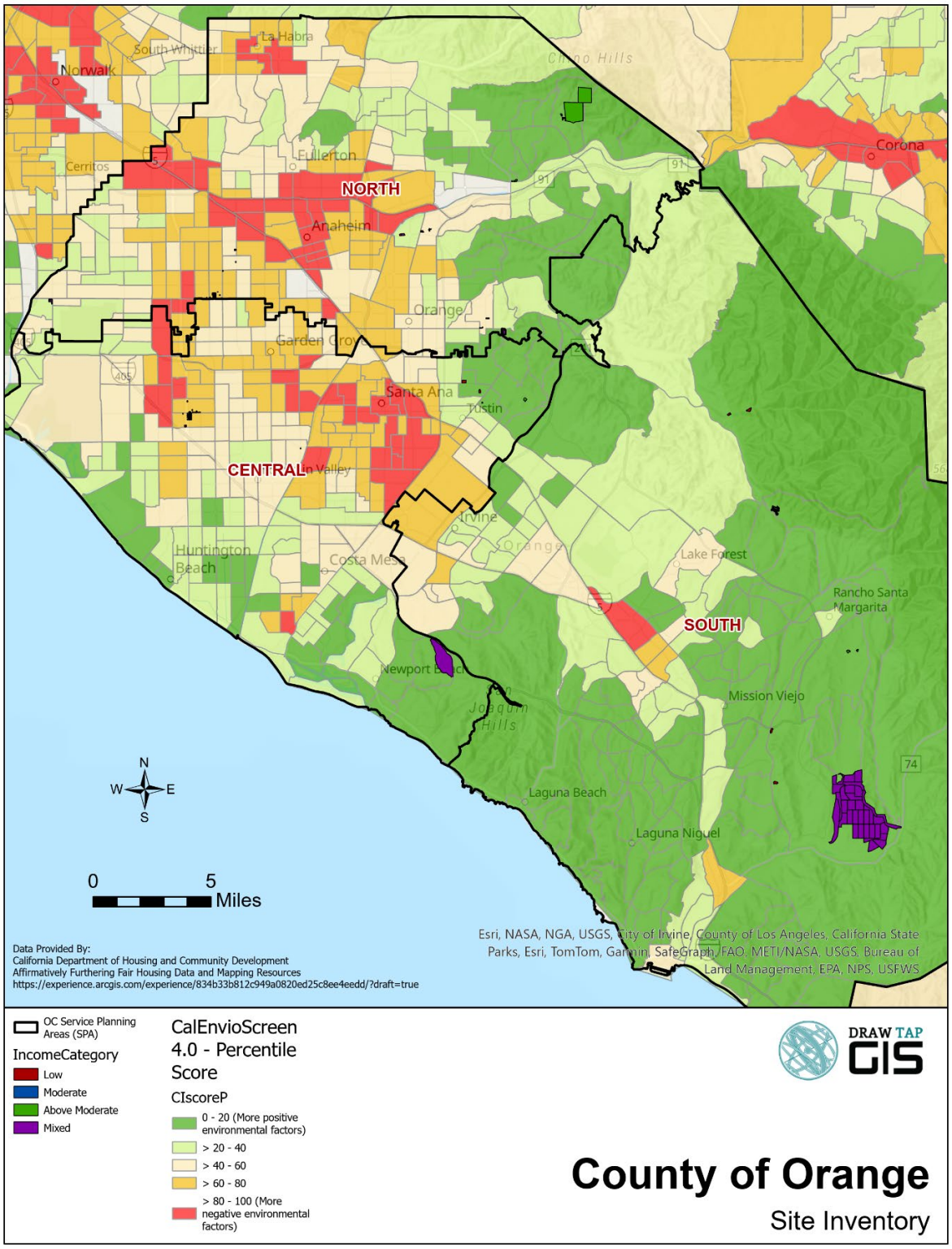
CalEnviroScreen 4.0 percentile scores by tract and the sites selected to meet the RHNA are presented in **Table 4-43** and **Figure 4-26**. South Orange County generally has superior environmental outcomes based on CalEnviroScreen 4.0 score compared to the Central and North areas. Of all units identified to meet the RHNA, 58.4% scored in the 20th percentile or lower (best scores), 12% scored in the 20th to 40th percentile range, 9% scored in the 40th to 60th percentile range, and 20.6% scored in the 60th to 80th percentile range. There are no RHNA units located in tracts scoring in the 80th percentile or above (worst scores). However, a larger proportion of lower-income units (41.6%) are in tracts scoring in the 60th percentile or higher compared to moderate- (10.6%) and above-moderate- (0.1%) units. Nearly all units identified to meet the above-moderate-income RHNA scored within the 20th percentile range (best scores) compared to only 21.4% of lower-income units and 64.6% of moderate-income units.

Table 4-43
Sites Inventory by CalEnviroScreen Percentile Score

CalEnviroScreen Percentile Score (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
0-20	1068	21.4%	1288	64.6%	4138	99.9%	6494	58.4%
20-40	934	18.7%	403	20.2%	0	0.0%	1337	12.0%
40-60	910	18.3%	93	4.7%	0	0.0%	1003	9.0%
60-80	2071	41.6%	211	10.6%	4	0.1%	2286	20.6%
80-100	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on OEHHA CalEnviroScreen, 2021).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable CalEnviroScreen scores within a single score range (i.e., there are multiple tracts containing RHNA units with CalEnviroScreen scores below 20. The RHNA units shown are the summation of all units in various Unincorporated tracts with CalEnviroScreen scores in this range).

Figure 4-26
Distribution of RHNA Sites and CalEnviroScreen Score by Tract



Source: HCD AFFH Data Viewer 2.0 (based on OEHHA CalEnviroScreen, 2021).

Candidate Sites and Cost Burden

Overpayment by homeowners by tract and the sites inventory are shown in **Table 4-44** and **Figure 4-27**. There are no RHNA units located in tracts where more than 60% of owners are cost burdened. The largest proportion of RHNA units (84.2%) are in tracts where between 20% and 40% of owners are cost burdened. There are more lower-income RHNA units (24%) in tracts where between 40% and 60% of owners are cost burdened compared to moderate- (15.6%) and above-moderate-income units (1.8%). However, an additional 177 lower-income units (3.6% of all lower-income units) are in tracts where less than 20% of owners are cost burdened. There are no moderate- or above-moderate-income units in tracts with populations of cost burdened owners in this range.

The sites inventory and burdened renter households are presented in **Table 4-45** and **Figure 4-28**. In general, cost burdened renters are more prevalent in tracts in North and Central Orange County compared to South Orange County. Nearly half of RHNA units (44.9%) are in tracts where between 60% and 80% of renters overpay for housing. A smaller proportion of lower-income units are in tracts with populations of cost burdened renters in this range (14.2%) compared to moderate-income units (64.1%) and above-moderate-income units (72.5%). Another 36.5% of RHNA units are in tracts where 40% to 60% of renters are cost burdened and 17.8% are in tracts where 20% to 40% of renters are cost burdened. There are an additional 102 above- moderate-income units in tracts where less than 20% of renters overpay for housing. There are no RHNA units are tracts where more than 80% of renters are cost burdened.

Table 4-44
Sites Inventory by Cost Burdened Owners

Cost Burdened Owners (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	177	3.6%	0	0.0%	0	0.0%	177	1.6%
20-40%	3608	72.4%	1684	84.4%	4067	98.2%	9359	84.2%
40-60%	1198	24.0%	311	15.6%	75	1.8%	1584	14.2%
60-80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

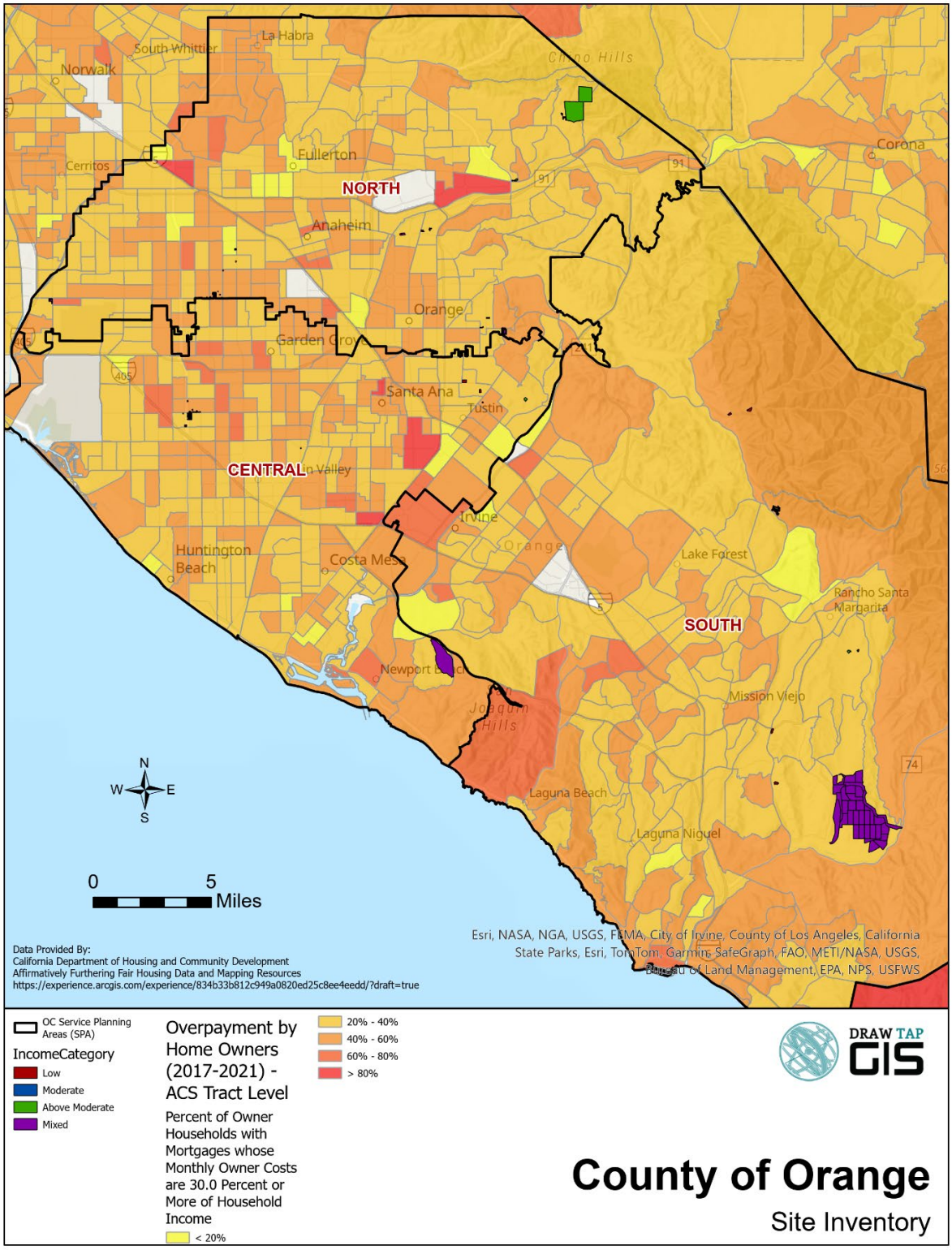
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable cost burdened owner populations within a single population range (i.e., there are multiple tracts containing RHNA units with cost burdened owner populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with cost burdened owner populations in this range).

Table 4-45
Sites Inventory by Cost Burdened Renters

Cost Burdened Renters (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	102	2.5%	102	0.9%
20-40%	1047	21.0%	312	15.6%	615	14.8%	1974	17.8%
40-60%	3226	64.7%	404	20.3%	424	10.2%	4054	36.5%
60-80%	710	14.2%	1279	64.1%	3001	72.5%	4990	44.9%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

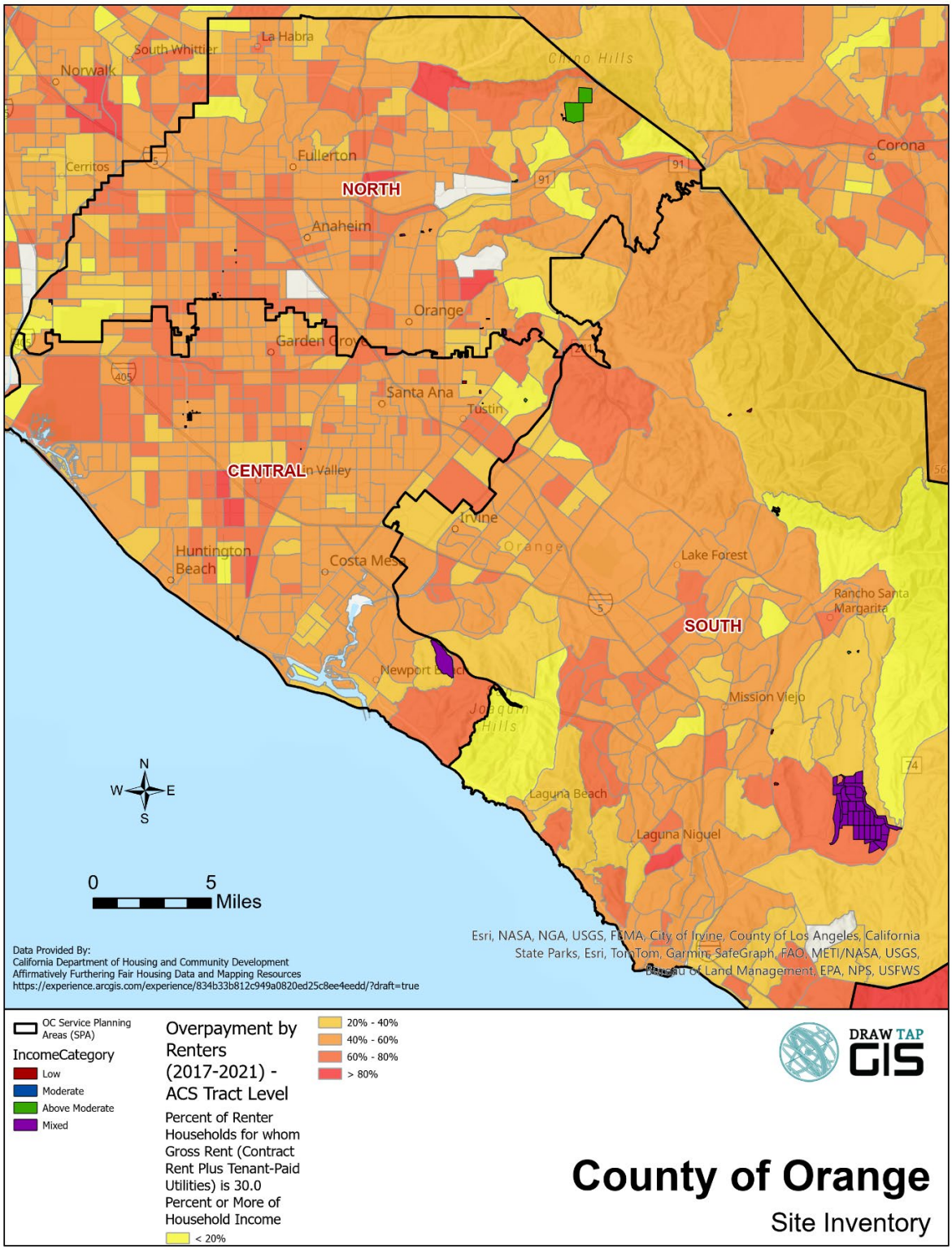
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable cost burdened renter populations within a single population range (i.e., there are multiple tracts containing RHNA units with cost burdened renter populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with cost burdened renter populations in this range).

Figure 4-27
Distribution of RHNA Sites and Cost Burdened Owners by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Figure 4-28
Distribution of RHNA Sites and Cost Burdened Renters by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Candidate Sites and Overcrowding

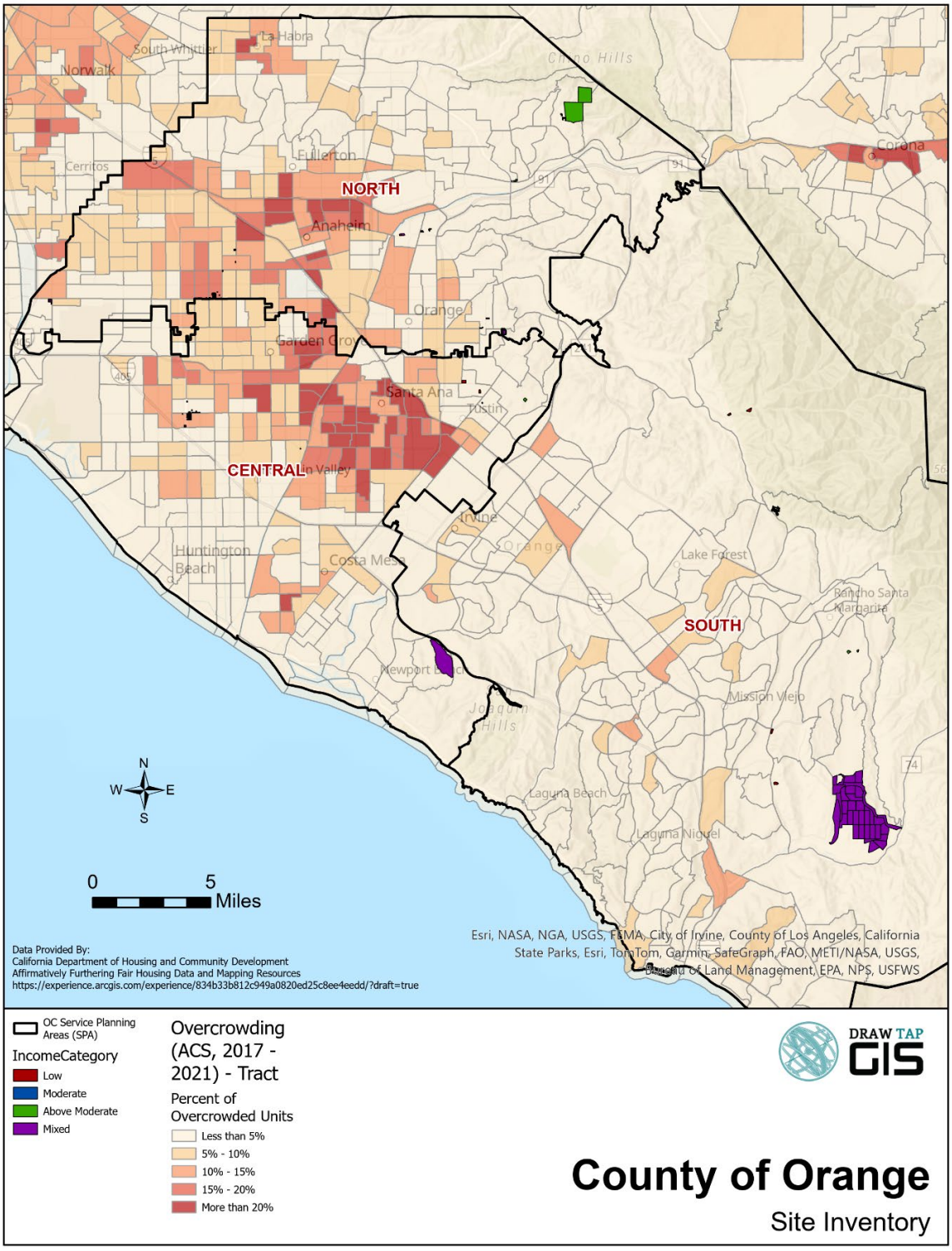
In general, overcrowding is more prevalent in the North and Central County areas (see **Figure 4-29**). As shown in **Table 4-46**, most RHNA units (82%) are in tracts where less than 5% of households experience overcrowding. However, a larger proportion of moderate- (89.5%) and above-moderate- (99.9%) income units are in tracts with populations of overcrowded households in this range. In comparison, 64.1% of lower-income units are in tracts where less than 5% of households are overcrowded, 4.6% where 5% to 10% of households are overcrowded, 29.1% where 10% to 15% of households are overcrowded, and 2.3% where 15% to 20% of households are overcrowded. There are no RHNA units of any income level in tracts where more than 20% of households are overcrowded.

Table 4-46
Sites Inventory by Overcrowded Households

Overcrowded Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<5%	3193	64.1%	1785	89.5%	4138	99.9%	9116	82.0%
5-10%	227	4.6%	31	1.6%	0	0.0%	258	2.3%
10-15%	1449	29.1%	100	5.0%	4	0.1%	1553	14.0%
15-20%	114	2.3%	79	4.0%	0	0.0%	193	1.7%
>20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable overcrowded populations within a single population range (i.e., there are multiple tracts containing RHNA units with overcrowded populations below 5%. The RHNA units shown are the summation of all units in various Unincorporated tracts with overcrowded populations in this range).

Figure 4-29
Distribution of RHNA Sites and Overcrowded Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Candidate Sites and Sensitive Communities At Risk of Displacement

As shown in **Figure 4-30**, tracts that are considered communities at risk of displacement are more populated in the North and Central County areas. The distribution of RHNA units by displacement risk is shown in **Table 4-47**. Most RHNA units (74.3%) are in tracts that are not considered vulnerable communities. However, more than half (51.2%) of RHNA units identified to meet the lower-income RHNA are in vulnerable communities compared to only 15.2% of moderate-income units and 0.1% of above-moderate-income units.

Table 4-47
Sites Inventory by Displacement Risk

Vulnerable Population (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
At Risk of Displacement	2550	51.2%	304	15.2%	4	0.1%	2858	25.7%
Not At Risk of Displacement	2433	48.8%	1691	84.8%	4138	99.9%	8262	74.3%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified as communities at risk of displacement (i.e., there are multiple tracts containing RHNA units that are considered communities at risk of displacement. The RHNA units shown are the summation of all units in various Unincorporated tracts that are considered communities at risk of displacement).

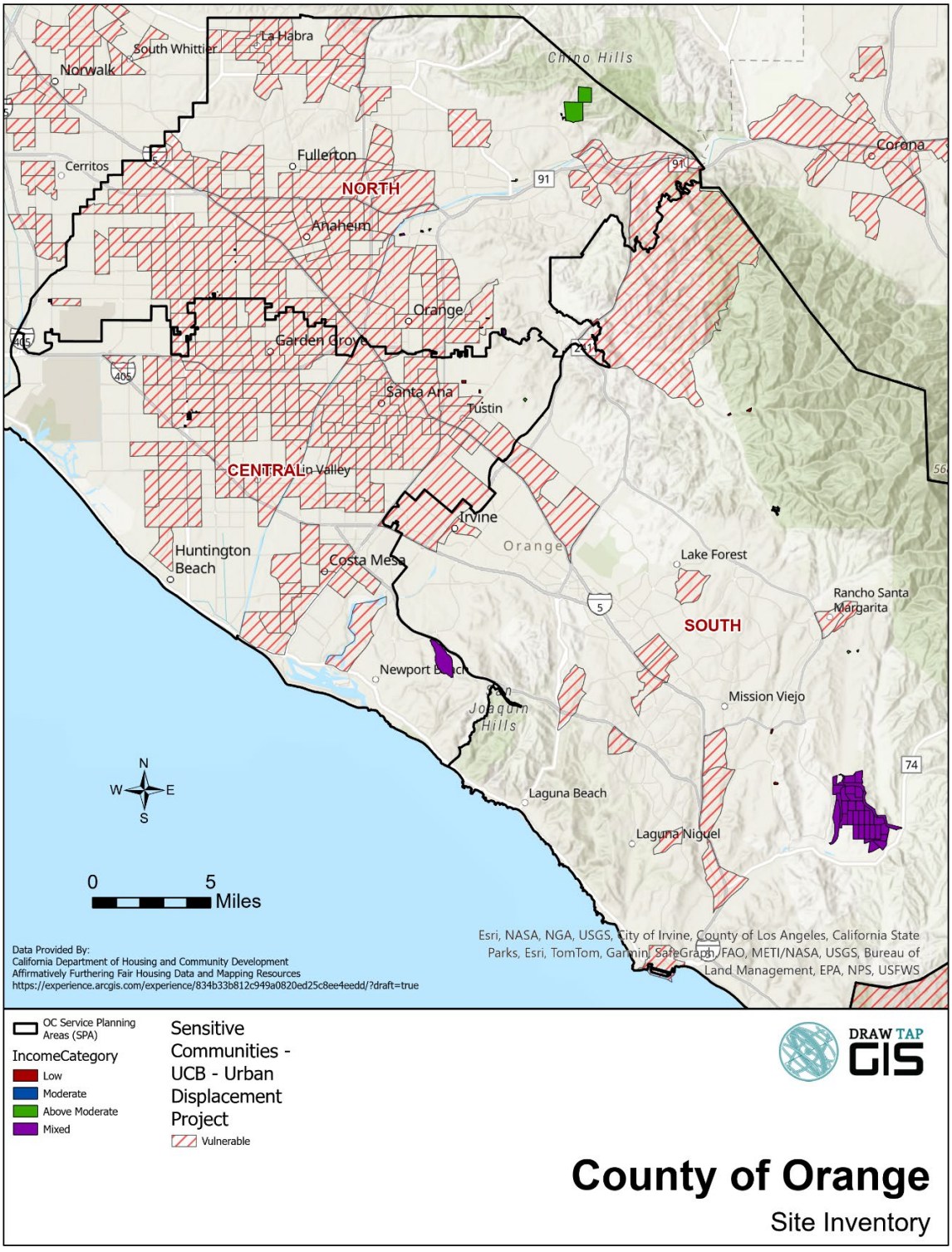
The sites inventory by Unincorporated CDP or tract is presented in **Table 4-48**. Of the tracts in North County where more than 500 RHNA units have been allocated, Rossmoor, tract 756.04, and tract 762.01, only tract 756.04 is considered a vulnerable community. In the North County, approximately 35.5% of RHNA units are in tracts that are considered vulnerable communities. In the Central County area, Midway City and tract 992.27 are considered vulnerable while North Tustin and tract 626.45 are not. In the Central County, 74.1% of RHNA units are in vulnerable communities. None of the Unincorporated County areas in the South are considered at risk of displacement.

Table 4-48
Sites Inventory by Displacement Risk – CDPs and Unincorporated Tracts

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate Income Units	Total RHNA Units	Vulnerable Community?
Northern Unincorporated County					
Rossmoor	525	188	0	713	No
Tract 218.16	130	0	44	174	No
Tract 218.25	0	0	420	420	No
Tract 219.13	302	26	0	328	Yes
Tract 756.04	351	164	0	515	Yes
Tract 762.01	409	215	0	624	No
Tract 762.02	431	0	0	431	No
Tract 871.01	177	0	0	177	Yes
Tract 877.01	0	36	0	36	Yes
Tract 877.03	50	0	0	50	Yes
Tract 878.05	0	31	0	31	Yes
Tract 878.06	114	48	0	162	Yes
Central Unincorporated County					
Midway City	1907	132	4	2043	Yes
North Tustin	45	0	63	108	No
Tract 626.45	62	124	432	618	No
Tract 992.27	0	31	0	31	Yes
Southern Unincorporated County					
Coto de Caza	0	0	113	113	No
Ladera Ranch	30	0	0	30	No
Las Flores	60	0	0	60	No
Rancho Mission Viejo	165	1000	3001	4166	No
Silverado	180	0	0	180	No
Trabuco Canyon	0	0	65	65	No
Tract 320.11	45	0	0	45	No

Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).

Figure 4-30
Distribution of RHNA Sites and Displacement Risk by Tract



Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).

Candidate Sites and AFFH Summary

This summary of candidate sites and AFFH variables will be described in subsections on the North, Central, and South County. The sites inventory and AFFH variables are presented in the table below. The sites inventory is also shown in **Figure 4-31.**

North Orange County. North Orange County is generally characterized by larger protected populations and reduced access to opportunities compared to the South County and parts of the Central County. A total of 3,661 RHNA units have been allocated in North Orange County, making up approximately a third (32.9%) of the total units identified countywide, consistent with the representation of North Orange County in this analysis (one third of the County). Of the 3,661 units, 2,489 are lower-income units (68%), 708 are moderate-income units (19.3%), and 464 are above-moderate-income units (12.7%).

Compared to the Central and South County areas, the North County has more moderate resource areas. However, nearly half (49.8%) of units identified in the North County are in the highest resource areas, followed by high resource areas (37.8%) and low resource areas (12.5%). It is relevant to note that 100% of above- moderate-income units in the North County are in highest resource areas compared to only 40.4% of low-income units and 49.7% of moderate-income units. Similarly, only 21.4% of RHNA units in North Orange County are in vulnerable communities at risk of displacement, but none of these units are allocated towards the above-moderate-income RHNA. Approximately 26% of lower-income units and 20% of above-moderate-income units are in sensitive communities at risk of displacement.

While the North County tends to face more issues related to fair housing compared to the Central and South County areas, actions outlined in this Housing Element aim to mitigate fair housing issues and increase access to economic, environmental, and housing opportunities in this area. Additionally, units identified to meet the RHNA are in North County tracts of variable TCAC allocations (moderate, high, highest), none of which are low resource areas. The distribution of RHNA sites in moderate and high/highest resource areas promotes more housing opportunities in moderate resource areas where there may be higher needs, while also increasing housing mobility by providing new housing opportunities in high resource areas. Further, though a larger proportion of tracts in the North County are considered LMI areas (where more than 50% of households have low or moderate incomes), most RHNA units in the North County area, including 81% of lower-income units, are not in LMI areas, ensuring new affordable housing does not exacerbate existing fair housing issues.

Central Orange County. Demographics trends in Central Orange County are the most variable of the three County subsections. In the central areas, trends tend to mimic those seen in the North County, while coastal areas tend to be more affluent with better access to opportunities. A total of 2,800 RHNA units have been identified in the Central County, including 2,014 lower-income

units (71.9%), 287 moderate-income units (10.3%), and 499 above-moderate-income units (17.8%). RHNA units in Central Orange County represent about 25% of the total sites inventory.

Most tracts in the Central County area with RHNA sites are highest or high resource areas. Of all RHNA units identified in the Central County, 25.9% are in highest resource areas, 54.2% are in high-resource areas, and 19.9% are in moderate resource areas. Nearly all (99.2%) above-moderate-income units are in highest resource areas. A larger proportion of low- (22.7%) and moderate- (34.5%) are in moderate resource areas compared to above-moderate-income units (0%). About 26% of units are in RCAAs including 5.3% of lower-income units, 43.2% of moderate-income units, and 99.2% of above-moderate-income units. Midway City is comprised of one moderate and one high resource area. Neither tract is an RCAA, but both are considered vulnerable communities. A total of 2,043 units (1,907 lower-income, 132 moderate-income, and 4 above-moderate-income) are in Midway City. North Tustin is comprised of all highest resource areas, all of which are RCAAs. None of the tracts in North Tustin with RHNA units are considered sensitive communities at risk of displacement. There are opportunities identified in North Tustin to accommodate 108 units (45 lower-income and 63 above-moderate-income).

South Orange County. South Orange County generally has higher incomes, smaller non-White populations, and higher access to opportunities compared to the Central and North County. Sites with a capacity to accommodate 4,659 units (480 lower-income, 1,000 moderate-income, and 3,179 above-moderate-income).

All communities in South Orange County where RHNA sites have been identified are considered highest resource areas. Opportunities to accommodate lower-income units have been identified in Ladera Ranch, Las Flores, Rancho Mission Viejo, and Silverado. Coto de Caza, Ladera Ranch, Las Flores, Rancho Mission Viejo, and Trabuco Canyon are all considered RCAAs. None of the tracts with RHNA sites in the South County are sensitive communities at risk of displacement.

Table 4-49
Candidate Sites and AFFH Summary

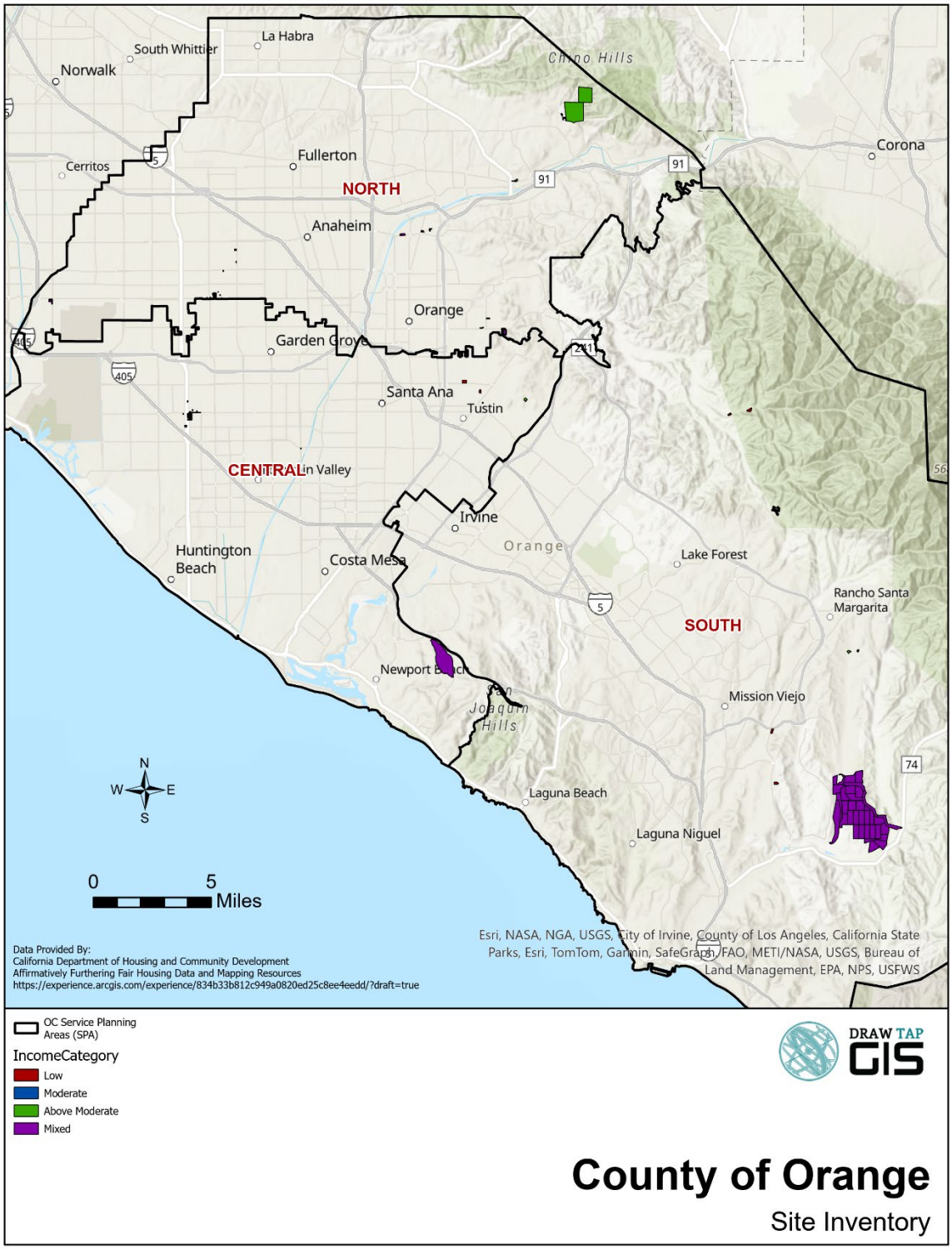
Area/Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			% Non-White	% LMI[1]	RCAA?	TCAC Opp. Cat.	At Risk of Displace-ment?
			Lower	Moderate	Above Moderate					
North County										
Rossmoor (1100.06)	1151	713	525	188	0	36.4%	21.7%	Yes	Highest	No
218.16	1929	174	130	0	44	34.2%	42.6%	Yes	Highest	No
218.25	1104	420	0	0	420	41.0%	17.2%	Yes	Highest	No
219.13	1971	328	302	26	0	76.1%	79.2%	No	High	Yes
756.04	2695	515	351	164	0	30.3%	9.5%	Yes	Highest	No
762.01	2639	624	409	215	0	55.6%	49.2%	Yes	High	No
762.02	1870	431	431	0	0	57.4%	20.6%	No	High	No
871.01	1653	177	177	0	0	74.7%	32.1%	No	Moderate	Yes
877.01	1556	36	0	36	0	74.0%	71.0%	No	Moderate	Yes
877.03	1670	50	50	0	0	81.2%	72.7%	No	Moderate	Yes
878.05	1755	31	0	31	0	82.5%	74.5%	No	Moderate	Yes
878.06	1606	162	114	48	0	86.0%	71.8%	No	Moderate	Yes
Subtotal		**3,661**	**2,489**	**708**	**464**					
Central County										
Midway City (997.01)	1909	526	458	68	0	87.3%	62.0%	No	Moderate	Yes
Midway City (997.02)	2465	1517	1449	64	4	76.5%	83.3%	No	High	Yes
North Tustin (756.03)	1437	10	0	0	10	30.0%	44.3%	Yes	Highest	No
North Tustin (756.05)	2080	16	0	0	16	36.2%	34.5%	Yes	Highest	No
North Tustin (756.06)	2111	37	0	0	37	33.4%	20.5%	Yes	Highest	No
North Tustin (757.02)	1138	45	45	0	0	31.9%	20.6% - 40.8%	Yes	Highest	No
626.45	2622	618	62	124	432	25.2%	6.9%	Yes	Highest	No
992.27	1882	31	0	31	0	74.3%	79.6%	No	Moderate	Yes
Subtotal		**2,800**	**2,014**	**287**	**499**					
South County										
Coto de Caza (320.44)	1951	113	0	0	113	21.5%	24.2%	Yes	Highest	No
Ladera Ranch (320.66)	2577	30	30	0	0	37.5%	60.0%	Yes	Highest	No
Las Flores (320.65)	1685	60	60	0	0	37.5%	35.6%	Yes	Highest	No
Rancho Mission Viejo (320.66)	2577	4166	165	1000	3001	37.5%	60.0%	Yes	Highest	No
Silverado (320.11)	672	180	180	0	0	21.8%	46.0%	No	Highest	No
Trabuco Canyon (320.41)	372	65	0	0	65	28.9%	26.5%	Yes	Highest	No

Table 4-49
Candidate Sites and AFFH Summary

Area/Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			% Non-White	% LMI[1]	RCAA?	TCAC Opp. Cat.	At Risk of Displace-ment?
			Lower	Moderate	Above Moderate					
320.11	672	45	45	0	0	21.8%	46.0%	No	Highest	No
Subtotal		**4,659**	**480**	**1,000**	**3,179**					

Note 1: LMI households are calculated at the block group level. Therefore, one tract may contain multiple block groups.
Source: HCD AFFH Data Viewer 2.0.

Figure 4-31
Sites Inventory Locations



Source: Orange County Sites Inventory, 2024.

Summary of Fair Housing Issues/Assessment of Contributing Factors to Fair Housing

Orange County AI

As identified by the Orange County AI and the above analysis, Orange County experiences the following local contributing factors to fair housing:

> *Cost burden and severe cost burden* and overcrowding are issues for all income categories of the populations in the Unincorporated County areas and across all racial and ethnic groups. The Hispanic and Black communities facing more acute housing problems (including affordability) than other racial and ethnic communities. Based on the data, affordability is a serious issue for residents in Unincorporated County areas as with all residents in the State. Contributing factors may include the relative lack of multifamily housing units, the increased population (though the population of Unincorporated County areas has decreased as areas of the Unincorporated County areas have been annexed) and the lack of significant numbers of new affordable housing units being built.
>
> While 7.8% of Unincorporated County area residents have *disabilities*, the units available to disabled persons currently and funded by the County and other sources, likely address the needs of the smaller disabled population in the Unincorporated County areas and thus, this need is lower priority than the need for affordable, elderly, and multifamily housing (which could address affordability and overcrowding.
>
> There are five *racially or ethnically concentrated census tracts (RECAPS)* within Orange County as identified by HUD. These areas, however, are not in the Unincorporated County areas over which the County of Orange has land use jurisdiction. These identified census tracts have at least 50% non-white populations with a poverty rate that exceeds 40% and/or is three or more times the average tract poverty rate for the metropolitan area.
>
> The UC Davis Regional *Opportunity Index* shows that most residents within Orange County have moderate to high levels of access to opportunity, with some areas of low access. Additionally, analysis of the TCAC/HCD Opportunity Area Maps show that a large number of census tracts in northern Orange County have a "low resource" designation, meaning there is low access to essential resources for existing residents in those census tracts.
>
> The County is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying *displacement*. The AI also identifies the following cross-jurisdictional fair housing goals to mitigate the existing fair housing issues in the community:
>
> - Increase the supply of fair housing in high opportunity areas.

- Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, Vietnamese residents, seniors, and people with disabilities.
- Increase community integration for persons with disabilities.
- Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.
- Expand access to opportunities for protected classes.

Section 5, the County's Housing Action Plan, includes policy programs that seek to provide for an increased variety of housing types affordable to all economic segments of the community, as well as further improve general access to housing. The policy programs will provide additional opportunities for current residents and provide new housing opportunities for future residents.

Identification and Prioritization of Contributing Factors

1. Concentrations of Special Needs or Protected Populations

The North and parts of the Central County areas tend to have larger racial/ethnic minority and LMI household populations compared to the South County. These areas also tend to have more prevalent disproportionate housing needs such as overcrowding and displacement risk.

Priority Level: Low

Contributing Factors:

- Lack of investment in certain neighborhoods
- Quantity of affordable housing

2. Lack of Housing Options for Persons with Disabilities

The Central and South Orange County areas tend to have larger elderly populations and populations of persons with disabilities. Certain neighborhoods may have an increased need for housing for persons with disabilities.

Priority Level: Medium

Contributing Factors:

- County ordinances related to persons with disabilities

3. Disparities in Access to Opportunities

Certain neighborhoods, especially in the North and Central County areas, tend to be comprised of more low and moderate opportunities, whereas the South County is predominantly highest resource. These areas also have more tracts with communities at risk of displacement and populations of protected classes.

Priority Level: Low

Contributing Factors:

- Unaffordable rents and sales prices in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private and public investment in specific neighborhoods

4. Disproportionate Housing Needs

Within the Unincorporated County areas, there is a mix, with some pockets that are either established middle-income areas, at risk of becoming exclusive, or are susceptible to or have ongoing displacement. The Unincorporated County areas specifically appear to have a mismatch between the demand for larger affordable units and the available affordable units, as well as (similar to the rest of Orange County) high housing costs.

Priority Level: High

Contributing Factors

- Unaffordable rents and sales prices in a range of sizes
- Shortage of subsidized housing units
- Cost of repairs and rehabilitation
- Dominance of single-family housing, which is typically more expensive than multifamily

5. Fair Housing Enforcement and Outreach

Fair housing outreach for residents in the Unincorporated County is limited and residents may be unaware of their rights and responsibilities, as well as resources available. The County does not currently have a method for the dissemination of fair housing information.

Priority Level: Low

Contributing Factors:

- Limited resources to pay for outreach
- Increasingly fewer people rely on newspapers to receive information; public notices and printed flyers are costly and ineffective means to reach the community at large
- Unknown language barriers and resource barriers to accessing information

5. HOUSING ACTION PLAN

This section of the Housing Element presents the County's Housing Action Plan for the period 2021-2029. The goals, strategies and actions described below are organized according to major issue areas and reflect the findings of the County's needs assessment and evaluation of the accomplishments since the last Housing Element update. The County will review these strategies and actions continuously throughout the planning period and adjust better accomplish the objectives as necessary.

Based on the data in Community Profile, Section 2, the County should consider the following findings, which inform the programs proposed:

- The Unincorporated County population is showing aging trends. Senior residents, generally defined as those over 65 years of age, made up approximately 14.3% of the population in Unincorporated County areas. Based on these trends, housing should consider the needs of seniors who may have less flexible income and need accessibility or assisted living. **See Program 4.**
- Housing should account for cultural needs including larger or multifamily housing units since about 16% of renter households and about 15% of owner households have five or more members (Table 2-43) and additional housing information in other languages. **See Program 3.**
- Table 2-16 Median income shows that Unincorporated Midway City, El Modena, West Anaheim, and Stanton, are all lower-income CDPs based on the median Orange County income of $100,485. The County should, to the extent possible, support affordable housing in those CDPs and throughout Unincorporated County areas. **See Programs 3, 4 and 11**
- Approximately 52.44% of renters (Table 2-31) and 22.7% of homeowners spend more than 30% of their income on housing, indicating a high housing cost burden overall with a higher percentage of renters compared to owners experiencing overpayment. **See Programs 3 and 11.**
- Based on for sale and rental prices, moderate-income households cannot afford to own a home in Unincorporated County areas (Table 2-25 compared to Table 2-26), while lower-income households cannot afford to own or rent without experiencing cost burden (Table 2-25compared to Table 2-28). **See Programs 3 and 11.**
- Table 2-17 demonstrates 53% of rental units and 72.9% of owner-occupied units in Unincorporated County areas are 30 years old or greater, thus, renovations may ensure safer living environments. **See Program 6.**
- Table 2-23 shows a low vacancy rate in Unincorporate County areas at 3.8%, which indicates a high housing demand. **See Program 3.**

- Table 2-39 shows that 12% of homeowners in Unincorporated CDPs who are lower- income have at least one housing problems, while 40% of renters in Unincorporated CDPs who are lower-income have at least one housing problem. Housing problems include: Units with physical defects (no kitchen or bathroom), overcrowding, housing cost burden exceeding 30% of income or severe housing costs burden of 50% of income. **See Program 3 and 6.**

Strategies

- Ensure that the General Plan and Comprehensive Zoning Code identify and zone sufficient land at appropriate densities to accommodate the County's share of regional housing needs.
- Facilitate production of high-quality affordable housing for lower-income and special needs households and permanent supportive housing including affordable housing opportunities for households with incomes less than 30% of area median income (AMI) through inclusionary housing, incentives, and financial assistance.
- Conserve and improve the condition of the existing housing stock, especially affordable housing.
- Work cooperatively with cities and LAFCO to facilitate the annexation and revitalization of urbanized Unincorporated islands.
- Promote equal housing opportunities for all persons without discrimination on the basis of race, religion, ethnicity, sex, age, marital status, disability, or household composition through enforcement of fair housing laws.
- Encourage the development of supportive housing for persons with disabilities, and protected classes, through the following actions.
    - Conduct outreach and education on fair housing rights and of the process to make appropriate referrals for fair housing complaints.
    - Provide housing resources for prevention of homelessness and alternative housing for the homeless and disabled.
    - Address contributing factors to fair housing issues – including access to regional, economic, educational, and environmental opportunities.
    - Encourage the use of energy conservation features in residential construction, remodeling, and existing homes.

Programs, Objectives, Responsible Agencies, Funding Sources

An adequate supply of housing at affordable prices is critical to the long-term economic viability of Orange County. Previous surveys of business leaders have shown that the price of housing is

the leading barrier to business expansion. A shortage of housing at affordable levels makes it more difficult for businesses, government, and universities to recruit new employees, and exacerbates traffic congestion and air quality problems as workers commute longer distances in search of housing.

Through the Regional Housing Needs Assessment (RHNA) process, each jurisdiction is allocated a portion of the region's housing need through the year 2029. The current RHNA allocation projects housing need through the year 2029. The County of Orange's allocation for the 2021-2029 planning period, according to income category is shown in **Table 5-1**.

Table 5-1
Summary of Housing Needs by Income Category – 2021-2029

Extremely Low	Very Low	Low	Moderate	Above Mod	Total
1,570 units	1,569 units	1,866 units	2,040 units	3,361 units	10,406 units
15.1%	15.1%	17.9%	19.6%	32.3%	100%
Source: SCAG, 2021					

State law requires that jurisdictions adopt plans and policies to address their RHNA allocation for each planning cycle. The County proposes to address its allocated need for the current planning cycle through a variety of policies and programs that minimize constraints to the development of new housing and proactively assist in the development of housing for persons with low and moderate incomes. As discussed previously, the County's most important, but increasingly limited, resource for housing production is vacant buildable land.

As seen in County's land inventory (Appendix B), the Unincorporated territory under the jurisdiction of the County has shrunk considerably over the past 30 years due to annexations and incorporations. Seven new cities in South County incorporated during this time and multiple major annexations occurred. Taken together, these jurisdictional changes resulted in a loss of over 60,000 acres of Unincorporated territory, with its associated population and developable area.

The key implication of these jurisdictional realignments is that a far greater portion of new residential development in Orange County as a whole will take place within incorporated cities than in years past. Since only one major new planned community remains to be completed in the Unincorporated County areas (the Ranch Plan Planned Community in Rancho Mission Viejo), the County will continue to place major emphasis on infill development strategies in the urbanized Unincorporated islands. This policy will require close cooperation with adjacent cities and surrounding neighborhoods to ensure that new development is compatible with the existing fabric of these communities. A key strategy for the County is to encourage housing development on existing non-residential sites, including underutilized sites along arterial highways, through

application of the Housing Opportunities Overlay Zone. See Appendix B for a detailed discussion on this topic.

Program 1. Provide Adequate Sites, No Net Loss, and Site Replacement

Objectives:

The County has a remaining RHNA of approximately 7,953 units for the 2021-2029 RHNA planning period after credits for permitted or approved units, and actual and projected ADU development are taken into consideration. After sites that do not require rezoning are identified there is a RHNA shortfall is 4,719 units. To address the shortfall, the County has identified various sites that, while appropriate for redevelopment and intensification, required zoning amendments to increase residential development potential and serve as a significant incentive for redevelopment. The Board of Supervisors approved a Zone Change and Zoning Code Amendment in June 2024 to accommodate the remaining RHNA units.

Sites Rezoning

The RHNA shortfall to be addressed for the 2021-2029 planning period is 2,343 units in the very low- income category, 1,624 units in the low-income category, and 752 units in the moderate-income category. The County has made available sites to accommodate the RHNA shortfall by:

- Amending the Housing Opportunities Overlay (HOO) to accommodate a higher density of development by raising the maximum density from 43.5 to 70 du/ac, excluding any applicable density bonus units. The density is available to all properties in the HOO for the development of affordable housing.
- Establishing a minimum density of 30 dwelling units per acre in the Multifamily Dwellings (R2), Apartment (R3), Suburban Multifamily Residential (R4), Residential Profession (RP), and Mixed-Use (MX) zoning districts
- Rezoning properties with a current zone designation of Local Business (C1), General Business (C2), Commercial Community (CC), Commercial Highway (CH), Commercial Neighborhood (CN), or Residential Profession (RP) to the Mixed-Use (MX) zoning district
- Expanding the HOO by adding properties within the Multifamily Dwellings (R2), Apartment (R3), and Suburban Multifamily Residential (R4), Light Industrial (M1) and Mixed-Use zoning districts to the HOO

The County has identified 150 parcels that can be grouped into 59 sites (71.73 acres total) in the newly amended base districts with an HOO overlay. The amendments and rezoning were completed in July 2024. Sites that were rezoned, listed in the sites inventory table in the appendix, have an identified total realistic capacity of 5,137 units (exceeding the RHNA shortfall).

Table 5-2
Summary of Areas to be Rezoned

Zoning	Acres	Parcels	Total Units
HOO-Residential R-2	1.15	5	80
HOO-Residential R-3	1.99	9	142
HOO-Residential R-4	3.06	14	217
HOO-Mixed-Use	57.91	115	4,160
HOO-Other (M-1)	3.15	3	254
HOO Religious Institution Sites	4.47	4	284
Total	**71.73**	***150***	**5,137**

- *HOO: Housing Opportunity Overlay*
- *Density in all portions of the Housing Opportunities Overlay Zone is 70 units/acre and can go as high as 84 units/acre through a graduated density approach based on project size for projects that consolidate multiple properties.*
- *All base zoning districts in the site inventory require a minimum density of 30 units/acre.*

Sites that were rezoned and used to address an unaccommodated, lower-income RHNA (2,343 very low- income and the 1,624 low-income units) are subject to additional requirements under State law. Housing Element law (Government Code 65583.2[h]) requires that the County accommodate all the lower-income, unaccommodated RHNA on sites that are:

- Zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower-income households during the planning period; and
- Permit at least 16 units per site at a density of at least 20 units per acre; and
- At least half of the very low- and low-income housing need must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all the very low- and low-income housing need on sites designated for mixed-uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

The site inventory shows that most of the lower-income RHNA shortfall (3,967 units) is addressed on sites that allow mixed-use development. Sites to accommodate the moderate-income RHNA shortfall (752 units) are not subject to these requirements.

No Net Loss

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element site inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify, at the time of

approval, the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city or county must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project.

The County will evaluate residential development proposals for consistency with goals and policies of the General Plan and the 2021-2029 Housing Element sites inventory and make written findings that the density reduction is consistent with the General Plan and that the remaining sites identified in the Housing Element are adequate to accommodate the RHNA by income level. If a proposed reduction of residential density will result in the residential sites inventory failing to accommodate the RHNA by income level, the County will identify and make available additional adequate sites to accommodate its share of housing need by income level within 180 days of approving the reduced density project.

Site Replacement
Government Code Section 65583.2(g)(3) requires the replacement of units affordable to the same or lower-income level as a condition of any development on a nonvacant site identified in the Housing Element consistent with those requirements set forth in Government Code section 65915(c)(3). Replacement requirements shall be met for sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or
- Occupied by low or very low-income households For the purpose of this program "previous five years" is based on the date the application for development was submitted.

Pursuant to Government Code section 66300(d) (Chapter 654, Statutes of 2019 (SB 330)), the County shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund, State and Federal Grants (see funding descriptions below)

Timeframe: Rezoning actions: Adopted by the Board of Supervisors on June 25, 2024; as part of the entitlement review process, evaluate new projects for consistency with General Plan

objectives as they relate to housing and RHNA obligations; ongoing implementation and annual assessment of status of housing sites inventory as part of the annual reporting process.

Program 2: Zoning Code Amendments

Objectives:

- Comply with Government Code Section 65583.2 which requires that vacant sites that were identified in the County's 4th and 5th cycles Housing Element as sites for the lower-income RHNA and nonvacant sites that were identified in the County's 5th cycle Housing Element as sites for lower-income RHNA are subject to by-right approval (exempt from CEQA) and subject only to design review based on objective standards, when a project includes 20 percent of the units affordable to lower-income households and no subdivision is proposed. The County did not identify vacant potential sites in this 6th Cycle site inventory that were identified in the previous two cycles and thus, there are no vacant sites that need to be re-zoned. Parcels that are subject to by-right approval pursuant to State law are identified in Appendix C.
- Continue to allow emergency shelters without Use Permit or other discretionary permit in the commercial and industrial portions of the Housing Opportunities Overlay Zone subject to appropriate development standards pursuant to Government Code Sec. 65583.a.4.
- Remove the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable units. These uses will be allowed as a by-right use. For multifamily development with 5 or more units, the Site Development Permit requirements will be amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards.
- Adopt Objective Design Standards (ODS) to provide local guidance on design and standards for housing development, including by-right projects, as allowed by State law and the Housing Accountability Act which prohibits a local agency from disapproving or reducing the density of housing development projects that comply with local and state regulations unless the agency can make certain written findings.

Responsible Agencies: OC Community Resources, OC Housing Authority, and OC Development Services

Funding Sources: General Fund, State and Federal Grants and Loans (see grant descriptions below), HUD Housing Choice Voucher Program Section 8

Timeframe: Rezoning actions and ODS: Adopted by the Board of Supervisors on June 25, 2024.

Program 3. **Facilitate Affordable Housing Development**

The County will provide an adequate supply of housing that varies sufficiently in cost, style, tenure, and neighborhood type to meet the economic and social needs of existing and future residents of the county; and which provides sufficient housing opportunities to achieve a better jobs-housing balance for employees of businesses located in the Unincorporated County areas.

Objectives:

Specifically, the County will:

- Within 12 months of Housing Element adoption/certification, encourage and facilitate affordable housing development by providing information on the County website about opportunities and resources for affordable housing development. Specifically:
    - Create a Housing Opportunities Overlay Map and webpage to providing information about the Housing Opportunities Overlay and identify areas where higher density projects would be permitted with expedited processing, and which may be eligible for density bonuses.
    - Develop informational materials on the County's website regarding the County's lot consolidation incentives and density bonus program.
- OC Development Service's "Affordable Housing Project Manager" will promote the MyOCeServices web portal and the ease of application review and approval of affordable housing projects. The Affordable Housing Project Manager will ensure that permit issuance for proposed projects is not unnecessarily delayed.
- Every two years, review incentives for density bonuses, expedited permit processing procedures, development standards, tax-exempt conduit financing, infrastructure financing assistance, and direct financial assistance to determine if changes or updates are needed to further facilitate the production of affordable units.
- Within one year of approval of the Housing Element and approval by the Department of Housing and Community Development, OC Development Services will update its "Orange County Housing Opportunities Manual" and will also create and distribute promotional materials explaining the County's expedited permit processing and incentives for affordable housing to be provided to

developers in the region. The following incentives for the development of affordable housing are offered or will be offered:

- Expediting the approval process for parcel maps that include affordable housing units.
- Ministerial (no public hearing) review of lot line adjustments.
- Provide technical assistance, through the OC Community Resources division, to acquire funding.
- Modification of development standards.

- Create an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law.
- The County will continue to participate in the Housing Choice Voucher Program (See Program 10) to provide rent subsidies to very low-income households, provided funding is available. On an ongoing basis, review the County Housing Authority's participation in the Housing Choice Voucher Section 8 Rental Assistance Program and pursue additional vouchers/funding when available. Review annually and update the Supportive Housing Notice of Funding Availability for financial assistance for the development of housing.
- Continue to publish the Affordable Housing Rental List and review/update list annually.
- Continue to support the DPRC in reviewing existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production. This includes ensuring guidance documents that are available to applicants clearly identify which approvals and/or permits specific housing projects are generally exempt from (e.g., lot consolidation for small housing sites does not generally require a parcel map). Approved DPRC policy and code amendment recommendations will be implemented within one fiscal year from approval.
- Review funding opportunities bimonthly and pursue, as the County has been, all state and federal housing grant funds for which the County is eligible.
- Approve affordable housing projects in Rancho Mission Viejo administratively and report annually to State HCD and the Board of Supervisors regarding

progress toward the development of Rancho Mission Viejo and its affordable housing sites through a required Annual Monitoring Report

- Coordinate with the City of Newport Beach for development and shared RHNA credit of the identified parcels on the County-owned Coyote Canyon site (as shown in Appendix B). Include 30% of the County's total unit share as affordable units (618 total units including 186 units set aside for deed-restricted, affordable housing for lower-income [10%] and moderate-income households [20%]).
- Work with all applicants proposing rental residential projects to encourage four-bedroom units that can providing adequate housing for all households, including large-family households (which are defined as those consisting of five or more members).
- Within 1 year of adoption of the Housing Element and approval by the Department of Housing and Community Development, meet with Developers and DPRC to identify potential constraints to the development of affordable housing and housing for those with special needs in the County's Zoning regulations. Address any identified constraints within 6 months.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund, State and Federal Grants (see funding descriptions below).

Timeframe: Administrative review process for qualified development projects: Adopted July 2024; HOO map and website within 18 months of Housing Element adoption and certification; Update Housing Opportunities Manual (completed in July 2024) and create and distribute lot consolidation incentives and density bonus informational materials: March 2025. Initiate review of incentives by June 2025; meet with developers and the DPRC starting in January 2025; Implement approved DPRC policy and code amendment recommendations within one fiscal year from approval.

Program 4: Promote Affordable Housing

In connection with other programs, continue to work with existing partners and seek new partners and volunteers from stakeholder and industry groups to further opportunities and provide incentives where possible for affordable housing.

Objectives:

Proactively encourage and facilitate the development of affordable housing by developers and Orange County jurisdictions for lower-income households,

particularly those with special needs including large households, seniors, extremely low-income (ELI) households, and households with persons who have disabilities or developmental disabilities. OC Community Resources staff will work cooperatively with other governmental agencies, business groups, universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County's long-term viability and the programs to facilitate affordable housing.

Specifically, the County will:

- On an ongoing basis, provide letters of support to affordable housing developers' applications to local, State, and Federal agencies for funding, provided the proposed projects are consistent with the goals and policies of the General Plan.
- Within 2 years of Housing Element approval, seek concurrence from the state Department of Housing and Community Development that affordable units built in cities and assisted with County funds (i.e., multi-jurisdictional agreement) should be partially credited toward the County's housing production for RHNA purposes in proportion to the amount of County funding.
- Work with cities and developers to identify incentives to reach agreements to transfer Regional Housing Needs Assessment (RHNA) credits for units transfer within city boundaries through a multi-jurisdictional agreement. Review strategy and approach annually.
- Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing. Consult with LAFCO at least once annually to identify priority areas with the highest potential for affordable housing development and annexation.
- Support development of affordable housing on religious property consistent with State law. Meet with owners of the religious properties identified in the inventory of sites to address the 6th Cycle RHNA (Appendix B). Provide information about regulatory changes (such as streamlined development), development standards and affordability requirements and incentives and/or assistance available through the County for development of housing on religious institution properties. Send the same informational material to all churches in the Unincorporated County.

- Meet annually with developers and housing organizations to evaluate projects for acquisition and rehabilitation/new construction of new shelters, and long-term affordable housing, including senior housing.
- Conduct an annual informational meeting with stakeholders, including the development community and property owners to facilitate housing development, including discussion of ADUs, expedited permit processing and lot splits or consolidations.
- Attend and promote development incentives at the bi-monthly Continuum of Care (CoC) Housing Opportunities Committee meeting and the bi-monthly OC Housing Finance Trust meetings.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Source: General Fund

Timeframe: Meet with non-profit developers and housing organizations every other year starting in 2025; Meet with owners of the religious properties identified in the inventory of sites to address the 6th Cycle RHNA by January 2025; Meet with the City of Newport Beach: November 2024; Initiate annual LAFCO meetings: January 2025.

Program 5: Density Bonus Ordinance

In compliance with Government Code section 65915, *et. seq.* the County has a Density Bonus ordinance that has been amended as needed to comply with State law, and which will continue to be amended as needed to comply with State law.

Objectives:

- Update Density Bonus Ordinance as needed to reflect changes to State Density Bonus law.

Responsible Agency: OC Development Services

Funding Source: General Fund

Program 6: Rehabilitate and Preserve Existing Residential Units, Especially Affordable Units

New construction represents a relatively small percentage of the Unincorporated County areas' total housing inventory. The preservation and rehabilitation of the existing housing stock, especially affordable apartments, is essential to meet the County's housing needs. Most of the

housing in need of rehabilitation within the Unincorporated County areas is in the older Unincorporated islands in North County. While no affordable units are at-risk of converting during the planning period, assisted rental projects that are eligible to convert to market rate due to the expiration of agreements between the owners and government agencies are of particular concern. The County participates in a variety of programs that provide assistance and incentives to property owners for carrying out needed repairs. Projects eligible to convert to market rate have also been evaluated for opportunities to extend existing commitments to maintain rents at affordable levels, and the County has regularly been successful in extending commitments to maintain rents at affordable levels.

It is also recognized that mature areas such as northern Orange County require ongoing investment for the general maintenance and periodic replacement of infrastructure such as streets, sidewalks, water and wastewater systems, storm drains, streetlights, landscaping, and other public facilities in order to maintain the quality of residential neighborhoods. Without this public investment, residents and landlords may be discouraged from making needed repairs to their properties and gradual deterioration may occur. In addition to the County's General Fund, the federal CDBG program provides financing for accessibility upgrades infrastructure maintenance and replacement.

Many of the older Unincorporated neighborhoods are in "islands" within city spheres of influence. The Board of Supervisors has established a policy of working cooperatively with the cities and LAFCO to facilitate the annexation of these islands in a timely manner. Where possible, such annexations should be part of a comprehensive program to help revitalize these communities by upgrading substandard housing and other facilities such as streets, storm drains, sidewalks, parks, and schools. Absent annexation, the County also expends County funds on public infrastructure projects within these Unincorporated "islands" to ensure the public facilities remain functional and compliant with modern regulations.

Objectives:

- Use available housing funding to finance housing rehabilitation. Assist ten households through rehabilitation efforts annually.
- While no affordable housing units have expiring affordability covenants, continue to monitor affordable housing projects with affordability covenants and take appropriate action to preserve these affordable units whenever they become at-risk of converting to market rate housing (e.g., extending contracts for participation in affordable housing programs).
- On an ongoing basis, implement and review the County's code enforcement and graffiti removal programs. Facilitate five improvements annually through the code enforcement and/or graffiti removal programs.

- On an ongoing basis, provide infrastructure maintenance in existing residential neighborhoods, including through the Capital Improvement Program (CIP). Facilitate 10 infrastructure improvements, including seven in the North and Central County Unincorporated areas during the planning period.
- On an ongoing basis, participate in the CDBG, HOME and related programs as a means of providing pass-through funding to affordable housing projects and efforts to rehabilitate existing affordable units or projects. Review opportunities annually.
- On an ongoing basis, enforce the provisions of the County's condominium and mobile home park conversion ordinance (section 7-9-89 and 7-9-92). Review compliance annually.

Responsible Agencies: OC Community Resources, CEO/Public Finance, and OC Development Services

Funding Sources: General Fund, State and Federal Grants and Loans (see grant descriptions below), CBGB and HOME (see Program 10, Pursue Funding Sources and Programs).

Program 7: Accessory Dwelling Units

In July 2020, the County updated the Comprehensive Zoning Code in accordance with the October 2019 passage of California Assembly Bill AB 68 (AB 68), Assembly Bill 881 (AB 881), Assembly Bill 587 (AB 587), Assembly Bill 671 (AB 671), and Senate Bill 13 (SB 13). The provisions encourage the development of ADUs by making the process less restrictive for homeowners and provide incentives for their development and/or preservation. ADUs are an important and feasible method for providing additional affordable housing units while maintaining the existing character of the Unincorporated County areas.

Objectives:

- Facilitate the development of Accessory Dwelling Units through:
    - Implementation of, within 2 years of adoption of the Housing Element and its certification by the Department of Housing and Community Development, an informational program to disseminate easily understandable information to homeowners regarding the construction of ADUs in the Unincorporated County areas. This will include the creation of a webpage on the County's website, fact sheets available in public areas, and notification to all citizen advisory groups. Disseminate information annually starting in January 2025.

- Preparation of pre-approved ADU plans to assist the public and streamline development of ADUs (Completed July 2024).
- Implementation of the Affordable Accessory Dwelling Unit Loan Program Policy Manual (July 19, 2023), within 2 years, designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences. Aimed to expand access to income opportunities for homeowners while also providing much needed affordable rentals exclusively for very low-income tenants with a priority on Section 8 voucher holders.

- Continue to track ADU Development through the ADU Monitoring Program. The program tracks applications for ADUs, location, and affordability of any ADUs offered for rent within the Unincorporated County areas. The intent of the Monitoring Program is to track progress in meeting 2021-2029 ADU construction goals and to evaluate the need to adjust programs and policies if the pace of construction is less than anticipated. Should changes need to be made due to a gap in the number of ADUs projected and the number permitted, the County will make changes proportional to the gap identified within 6 months of the annual review. This may include, but is not limited to, rezoning or community outreach.

Responsible Agencies: OC Development Services

Funding Sources: General Fund

Timeframe: Pre-approved ADU plans available to the public: Completed July 2024; ADU informational program: June 2025; Implementation of the Affordable Accessory Dwelling Unit Loan Program Policy Manual: June 2026

Objective*:* 513 ADUs during the planning period (this objective is a subset of and not in addition to the Quantified Objective for Program 1: Adequate Sites)

Program 8: Equal Housing Opportunity – Affirmatively Furthering Fair Housing

Equal housing opportunity is a fundamental right of all Americans. Federal and state fair housing laws make discrimination illegal, but enforcement action is sometimes necessary to ensure that existing laws are upheld. Existing federal law also requires new buildings to make reasonable accommodation for persons with disabilities. Section 4 provides a detailed assessment of the County's fair housing status. Additionally, the actions below aim to meaningfully address the fair housing and contributing factors identified in the most recent Orange County Analysis of Impediments to Housing Choice (AI) report and by the analysis provided in Section 4. An objective of this program is to facilitate the development of housing

that meets the needs of all segments of the population including affordable housing and households with specialized needs.

***Objectives**:*

- Objectives, timelines, geographic targeting, and 8-year metrics for actions to affirmatively further fair housing are detailed below. Actions include implementations measures under other programs in this Housing Element and new actions specific to this Program 8.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund. State and Federal grants and loans

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
Fair Housing Outreach and Enforcement				
Program 3: Facilitate Affordable Housing Development	Create a Housing Opportunities Overlay Map and webpage providing information about the Housing Opportunities Overlay and identify areas where higher density projects would be permitted with expedited processing, and which may be eligible for density bonuses.	Within 18 months of adoption/ certification of the Housing Element.	Countywide	Develop outreach and informational materials with the goal of facilitating the development of 8,122 housing units during the planning period.
	Develop informational materials on the County's website regarding the County's lot consolidation incentives and density bonus program.			
	Update the "Orange County Housing Opportunities Manual" and will also create and distribute promotional materials explaining the County's expedited permit processing and incentives for affordable housing to be provided to developers in the region.	Within 1 year of adoption and certification of the Housing Element.		
	Publish and review the Affordable Housing Rental List.	Annually		
Program 4: Coordination with Affordable Housing Stakeholders	Provide letters of support to affordable housing developers' applications to local, State, and Federal agencies for funding, provided the proposed projects are consistent with the goals and policies of the General Plan.	Initiate by January 2025 Annually	Countywide	Annually coordinate with regional entities and stakeholders to pursue and identify priority areas for affordable housing opportunities.
	Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing.			
	Conduct meetings with stakeholders, including the development community and property owners to facilitate housing development.			
	Attend and promote development incentives at the monthly Housing Opportunities Committee meeting and the bi-monthly OC Housing Finance Trust meetings.	Twice annually		
Program 8. AFFH	Implement Restrictive Covenant Modification Plan (RCM) including Phase III, examination of remaining handwritten documents for unlawful languages and process.	By July 2027	Countywide	Complete all three Phases of the RCM Implementation Plan during the planning period.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	Continue to work under contract with the FHCOC and/or other qualified fair housing service providers to provide fair housing services for all segments of the community. Evaluate and adjust the scope of services to ensure the County addresses any emerging trends in fair housing.	Annually	Countywide with emphasis on the North and Central County where there are concentrations of LMI households.	Serve 100 households through fair housing services annually.
	Provide federal/state/local information regarding discrimination to residents, including applicable Fair Housing Information and Discrimination Complaint Forms.			
	Maintain bilingual staff to assist non-English speaking families and ensure handicap accessible offices.			
	Work with the fair housing agencies to provide information and regarding housing discrimination and intervention to resolve complaints.			
	Use non-traditional media (e.g., social media, County website) in outreach and education efforts in addition to print media and notices.			
	Update the Affordable Housing Rental List (translated in multiple languages) on the County website.			
	Inform community members of the existence of the Orange County Fair Housing Council (FHCOC) and its oversight of fair housing practices by posting on the County's website and at the Planning counter.	By December 2025	Countywide	
	The County shall work with local resource agencies to implement an outreach program informing families within the county of housing and services available for persons with developmental disabilities.	Annually	Countywide with emphasis on North County Unincorporated areas.	Outreach to residents with the goal of serving 30 persons annually through services for persons with disabilities
Housing Mobility				
Program 2: Zoning Code Amendments	Allow emergency shelters without Use Permit or other discretionary permit in the commercial and industrial portions of the Housing Opportunities Overlay Zone.	By October 2024	Countywide	Revise the Zoning Code to allow emergency shelters without discretionary permit in the commercial and industrial portions of the

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
				Housing Opportunities Overlay Zone with the goal of initiating plans for a new emergency shelter.
	Remove the Site Development Permit requirement for multifamily developments of 1 to 4 units and any developments with 20% affordable units and allow by-right. Amend the Site Development Permit requirements for objective findings for developments of 5 units or more.			Facilitate the development of 8,122 units, including 4,494 affordable to lower-income households.
	Adopt Objective Design Standards (ODS).			
Program 3: Facilitate Affordable Housing Development	Review the County Housing Authority's participation in the Housing Choice Voucher Section 8 Rental Assistance Program and pursue additional vouchers/funding when available.	Annually	Countywide	Annually pursue additional funding for Section 8 Rental Assistance with the goal of increasing the number of voucher holders by 10% during the planning period.
	Work with applicants who propose for rent-residential projects to encourage four-bedroom units for large families as part of the proposed developments.	As proposals are received (ongoing)		Work with developers with the goal of developing of 50 units suitable for large households during the planning period.
	Meet with Developers and DPRC to identify potential constraints to the development of affordable housing and housing for those with special needs in the County's Zoning regulations.	Within 1 year of adoption Address within 6 months	Countywide	Facilitate the development of 8,122 units including 200 for persons with special needs (persons with disabilities, seniors, etc.).
Program 4: Coordination with Affordable Housing Stakeholders	Meet with owners of the religious properties identified in the inventory of sites and provide information on regulatory changes, development standards and affordability requirements and incentives and/or assistance available through the County for development of housing on religious institution properties.	By January 2025	Countywide	Initiate discussions of affordable housing development on religious properties with two owners during the planning period.
	Meet with non-profit developers and housing organizations to evaluate projects for acquisition and rehabilitation/new construction of new shelters, and long-term affordable housing, including senior housing.	Annually		Facilitate the development of 200 units for special needs populations (seniors, persons with disabilities, persons

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
				experiencing homelessness, etc.).
Program 8. AFFH	Review Definition of Single Housekeeping Unit. To promote flexibility to accommodate residents with different living conditions, the County will review and adopt revisions as appropriate to its zoning code to provide greater flexibility in consideration of accommodating a variety of household situations for related and unrelated individuals living together.	By December 2026	Countywide with emphasis on the Central County where populations of persons with disabilities are highest.	Facilitate the development of 50 units for persons with disabilities during the planning period.
	The County will review and may modify the group and sober living home ordinances in light of the decision in *The Ohio House v. City of Costa Mesa, et al.* Ninth Circuit Court of Appeals Case No. 22-56181 (December 4, 2024) and any subsequent relevant cases.	By July 2025		
	Seek State and Federal monies, as funding becomes available, for permanent supportive housing construction and rehabilitation targeted for persons with disabilities, including persons with developmental disabilities.	Annually		
	Develop a program /ordinance to provide regulatory incentives, such as expedited permit processing and fee waiver, to projects targeted for persons with disabilities, including persons with developmental disabilities.	Within 2 years of adoption of the Housing Element.		
	On an ongoing basis, enforce building code provisions requiring accessible design.	Annually		
	On an ongoing basis, implement the reasonable accommodation ordinance.			

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	On an ongoing basis, ensure the permitting requirements for group homes and care facilities for seven or more persons are consistent with State law and fair housing requirements.			
New Housing Opportunities in High Resource Areas				
Program 1: Provide Adequate Sites and Monitor for No Net Loss	Sites Rezoning – Amend the HOO to accommodate a higher density of development, establish a minimum density for R2, R3, R4, RP, and MX zones, rezone C1, C2, CC, CH, CN, RP to MX, and expand the HOO.	By July 2024	Housing Opportunities Overlay (HOO)	Make 150 sites available to accommodate the RHNA shortfall of 2,283 very low-, 1,624 low-, and 718 moderate-income units.
	No Net Loss – Identify and make available additional adequate sites to accommodate the share of housing need by income level.	Within 180 days, if required	Countywide	Ensure Housing Element sites are adequate to accommodate the RHNA and identify new sites, if necessary.
Program 3: Facilitate Affordable Housing Development	Review incentives for density bonuses, expedited permit processing procedures, development standards, tax-exempt conduit financing, infrastructure financing assistance, and direct financial assistance.	Every two years	Countywide	Ensure adequate sites remain available to accommodate 8,122 units during the planning period.
	Review with DPRC members the existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production.	Within 1 FY of approval		
	Review funding opportunities and aggressively pursue, as the County has been, all state and federal housing grant funds for which the County is eligible	Bimonthly		
	Approve affordable housing projects in Rancho Mission Viejo administratively.	Ongoing	Rancho Mission Viejo	
	Coordinate with the City of Newport Beach for development and shared RHNA credit of the identified parcels on the County-owned Coyote Canyon site.	By November 2024	Coyote Canyon site	
Program 7. Accessory Dwelling Units	Implement an informational program to disseminate information about developing ADUs.	Within 2 years of adoption Annually	Countywide with emphasis on the South County Unincorporated areas	Facilitate the development of 506 ADUs, including 336 affordable to lower-income households.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	Prepare pre-approved ADU plans.	July 2024		
	Implement the Affordable ADU Loan Program Policy Manual.	Within 2 years of adoption		
Program 10: Inclusionary Housing	Initiate consideration of an Inclusionary Housing Program/Policy.	By December 2026	Countywide with emphasis on the South County Unincorporated areas	Facilitate the development of 4,494 units affordable to low-income households (RHNA) including 75% in high or highest resource areas.
Program 11: Pursue Funding Sources To Achieve Housing Action Plan Goals	Leverage available funding sources such as Homekey funds to purchase or rehabilitate housing, including hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or permanent, long-term housing.	Annually	Countywide, with emphasis on Central County area where homeless populations are heightened	Facilitate the development of one interim or permanent, long-term housing project using funding sources such as Homekey funds during the planning period.
Place-based Strategies for Neighborhood Improvement				
Program 6. Rehabilitate and Preserve Existing Residential Units	Use available housing funding to finance housing rehabilitation.	Annually	Central and North County where aging units are more common	Assist 10 households through rehabilitation efforts annually.
	Implement and review the County's code enforcement and graffiti removal programs.	Ongoing		Facilitate 5 improvements annually through the code enforcement and/or graffiti removal programs.
	Provide infrastructure maintenance in existing residential neighborhoods, including through the Capital Improvement Program (CIP).	Annually	Countywide with emphasis on North and Central Orange County where opportunity sites for lower-income RHNA units have been identified.	Facilitate 10 infrastructure improvements, including 7 in the North and Central County Unincorporated areas during the planning period.
	Participate in the CDBG, HOME and related programs as a means of providing pass-through funding to affordable housing projects and efforts to rehabilitate existing affordable units or projects.	Annually	Central and North County where aging units are more common	Assist 10 households through rehabilitation efforts annually.
Program 8: AFFH	Adopt and implement an Environmental Justice (EJ) Element during the planning period.	By 2031	Countywide including actions targeting and benefiting North and Central County areas with worsened	Adopt an Environmental Justice Element during the planning period.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
			environmental conditions.	
Program 8: AFFH	Implement the County CIP plan including ADA, roadway, and infrastructure improvements in the Unincorporated County. Improvements may include: • Curb ramp, sidewalk, and driveway upgrades and improvements to satisfy current ADA standards and requirements. • Parkway, sidewalk, and intersection improvements.	Annually	Countywide with emphasis on North County where opportunities indices are lower.	Complete 10 CIP improvements annually including 3 in the North County area.
Program 8: AFFH	Facilitate the development or improvement of parks and open space under the County's CIP plan or other implementation plan benefiting residents of Unincorporated communities, particularly communities with reduced access to environmental opportunities. Projects may include: • Development of Mile Square Regional Park in Fountain Valley • Santa Ana River Trail • Ted Craig Regional Park improvements • Yorba Regional Park improvements	By 2031	North and Central County	Facilitate the development or improvement of 2 parks, open spaces, or recreational facilities during the planning period.
Tenant Protections and Anti-displacement				
Program 1: Provide Adequate Sites and Monitor for No Net Loss	Site Replacement – Comply with site replacement requirement pursuant to Government Code Section 65583.2(g)(3). Replace sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and: • Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or • Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or	As necessary (ongoing)	Countywide	Replace 100% of units for sites that meet the replacement requirement outlined in Program 1.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	• Occupied by low or very low-income households For the purpose of this program "previous five years" is based on the date the application for development was submitted.			
Program 6. Rehabilitate and Preserve Existing Residential Units	Monitor projects with expiring affordability covenants and take appropriate action to preserve these affordable units whenever possible. Promote funding and other opportunities to owners considering conversion of units through existing outreach programs and the County's website. Enforce the provisions of the County's condominium and mobile home park conversion ordinance.	Annually	Countywide	Preserve affordability of all 1.051 affordable units in the County.
Program 11: Pursue Funding Sources To Achieve Housing Action Plan Goals	Facilitate the development of one interim or permanent, long-term housing project using available funding sources such as Homekey funds (provided it is made available through the State) during the planning period which is anticipated to assist 50 persons experiencing homelessness annually.	Annually	Countywide, targeting the Central County area where homeless populations are heightened.	Assist 50 persons experiencing homelessness annually.

Program 9: Energy Conservation in Residential Developments

State law requires that jurisdictions analyze opportunities for energy conservation in residential development as part of their Housing Element review process. Controlling energy costs is one key component of the larger housing affordability issue.

Title 24 sets forth mandatory energy standards and requires the adoption of an "energy budget" for all new residential buildings and additions to residential buildings. Separate requirements are adopted for "low-rise" residential construction (i.e., no more than 3 stories) and non-residential buildings, which includes hotels, motels, and multifamily residential buildings with four or more habitable stories. The standards specify energy saving design for lighting, walls, ceilings, and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards and the use of non-depleting energy sources, such as solar energy or wind power. The home building industry must comply with these standards while localities are responsible for enforcing the energy conservation regulations through the plan check and building inspection processes.

In addition to architectural and construction techniques, thoughtful land use planning provides additional opportunities for energy savings. Examples of the County's energy-saving land use strategies include higher density along transit routes and close to employment centers and infill development. The Housing Opportunities Overlay Zone advances this goal, as does the County's long history of approving balanced communities such as Ladera Ranch and Rancho Mission Viejo planned communities.

Objectives:

- Review and update annually information on the County's website relating to energy conservation.
- On an ongoing basis, provide information regarding energy efficiency measures in the Orange County Housing Opportunities (HOO) Manual. Review and update manual annually related to energy conservation and on an ongoing basis provide manual online and at the County Service Center.
- On an ongoing basis, provide clients and the Development Processing Review Committee (DPRC), with information regarding "CalGreen" – California's Green Building Code. Review and annually update information on the County's website and at the County Service Center relating to the Green Building Code.
- On an ongoing basis provide sustainable provisions from the Board adopted Comprehensive Zoning Code Update to property owners online and at the County Service Center. Update information annually.

Responsible Agencies: OC Development Services

Funding Sources: General Fund and Utilities

Timeframe: Initiate annual website reviews and updates: January 2025; Update HOO Manual: Completed July 2024.

Program 10: Inclusionary Housing Program

An inclusionary housing program could boost production of homes for households earning 50% or less of the median income.

Objectives:

- Initiate consideration of an Inclusionary Housing Program (IHP) by 2026 to expand affordable housing options by considering a set aside of a certain number of units for households earning 50% or less of the median income. The County ordinance may propose that this affordable requirement could be provided either on-site, off-site, or through the payment of an in-lieu fee or provision of land. The in-lieu fee option would be intended primarily for small to midsize in-fill developments or subdivisions where insufficient land exists to provide both for-sale and rental units.

Responsible Agency: OC Development Services

Funding Sources: General Fund

Timeframe: Initiate IHP consideration; January 2026

Program 11: Pursue Funding Sources to Achieve Housing Action Plan Goals

The County has access to a variety of funding sources to provide adequate supply of decent and affordable housing and to accomplish the goals and strategies set forth in the Housing Action Plan. Facilitate the development of one interim or permanent, long-term housing project using available funding sources such as Homekey funds (provided it is made available through the State) during the planning period which is anticipated to assist 50 persons experiencing homelessness annually. Leverage available funding sources such as Homekey funds to purchase or rehabilitate housing, including hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or permanent, long-term housing.

a. Federal Resources

HOME Funds

The HOME Investment Partnership (HOME) Program is a federal program, created as a result of the National Housing Affordability Act of 1990. Under HOME, HUD awards funds to localities on the basis of a formula that takes into account tightness of the local housing market, inadequate housing, poverty, and housing production costs. Localities must qualify for at least $500,000, based on HUD's distribution formula, to receive direct allocation of funds, or can apply to the state or combine with adjacent jurisdictions.

HOME funding is provided to jurisdictions to assist either rental housing or homeownership through acquisition, construction, reconstruction, and/or rehabilitation of affordable housing. Also possible is tenant based rental assistance, property acquisition, site improvements, and other expenses related to the provision of affordable housing and for projects that serve a group identified as having a special need related to housing. The local jurisdiction must make matching contributions to affordable housing under HOME.

Community Development Block Grant Program (CDBG)

Through the federal CDBG program, HUD provides funds to local governments for funding a range of community development activities. For housing purposes, CDBG funds can be used for single and multifamily rehabilitation, rental housing acquisition or homeownership assistance, and other activities that support new housing construction (such as acquisition of property). CDBG grants benefit primarily persons/households with incomes not exceeding 80% of the County Median Family Income.

Section 108 Program

Section 108 is the loan guarantee provision of the CDBG program. This provision provides communities with a source of financing for a variety of housing and economic development activities. All rules and requirements of the CDBG program apply, and therefore all projects and activities must principally benefit low- and moderate-income persons, aid in the elimination or prevention of blight, or meet urgent needs of the community.

Monies received under the Section 108 loan guarantee program are limited to not more than 5 times the applicant's most recently approved CDBG amount, less prior Section 108 commitments. Activities eligible for these funds include economic development activities eligible under CDBG; acquisition of real property; rehabilitation of publicly-owned property; housing rehabilitation eligible under CDBG; construction, reconstruction, or installation of public facilities; related relocation, clearance or installation of public facilities; payment of interest on the guaranteed loan and issuance costs of public offerings; debt service reserves; and public works and site improvements.

Section 108 loans are secured and repaid by pledges of future and current CDBG funds. Additional security requirements may also be imposed on a case by case basis.

Mortgage Credit Certificate Program

Under the Mortgage Credit Certificate (MCC) Program, first-time homebuyers receive a tax credit of up to 15% of the mortgage interest paid for the year based on a percentage of the interest paid on their mortgage. This credit typically amounts to $80 to $125 month. This tax credit allows the buyer to qualify more easily for home loans as it increases the effective income of the buyer. Under federal legislation, 20% of the allocation must be set-aside for first time homebuyers with incomes between 75% and 80% of the County median income. This program may be used alone or in conjunction with a Down Payment Assistance Loan. The mortgage tax credit allows participants to meet monthly housing costs for households unable to meet monthly market-level payments. Additionally, lenders may write down the cost of the mortgage based on the value of the credit.

For the 2013-2021 planning period, the County financed thirty-one (31) homes through the CEO's first-time homebuyer program for low-income and moderate-income Orange County residents.

Housing Choice Voucher Section 8 Housing and Continuum of Care/ Certificates Grant Programs

The Housing Choice Voucher Section 8 Program and Continuum of Care/Certificate Grants provide monthly housing assistance payments to owners of rental properties in order to assist extremely low and very low-income families, elderly, and disabled persons with their rent. Housing Choice Voucher participants can choose any housing that meets the requirements of the program and are not limited to units located within subsidized housing projects. The Orange County Housing Authority (OCHA) administers Housing Choice Voucher Program within the Unincorporated Orange County area (as well as 31 of the 34 cities in Orange County). The rental assistance represents the difference between 30% of the recipients' adjusted monthly income and the federally approved Fair Market Rents (FMR), locally established Payment Standards or the owner's Gross Rent; whichever is less. In general, the FMR for an area represents the 40th percentile of median rents in a designated local metropolitan area. These programs are designed to utilize privately owned, decent, safe, and sanitary rental housing and assistance is available in the following forms:

- Continuum of Care/ Housing Certificate Program. This program is funded with annual renewal grants to assist homeless/disabled individuals who are qualified and referred to the Housing Authority through the Orange County Coordinated Entry System (CES). Under the certificate program, the property owner selects an

eligible tenant and enters into a contract with the Orange County Housing Authority that establishes the total rent, following an inspection and approval of the rental property. The actual approved rent cannot exceed contract rents for non-assisted units comparable units in the area as determined by Rent Reasonableness. Once approved, eligible tenants must pay the highest of either 30% of adjusted income or 10% of gross income. Housing subsidized through this program must meet Federal Housing Quality Standards established by HUD.

- Housing Choice Voucher Program (HCVP). This program is the largest tenant-based housing program and also includes Special Purpose Vouchers reserved for specific populations including the Veterans Administration Assisted Housing (VASH), Non-Elderly Disabled (NED), Family Unification (FUP), Project-based Vouchers (PBV), Mainstream and Homeownership programs. HCVP is similar to the Certificate Program and requires Housing Quality Standards inspections and the Rent Reasonableness to determine the approvable contract rent. However, the Housing Authority is able to establish Payment Standards which may be 90% to 110% of the published Fair Market Rents. The monthly Housing Assistance Payment (HAP) is determined by subtracting 30% of the tenant's adjusted income from the approved Gross Rent or Payment Standard (whichever is less). Overall rents are not restricted to the Fair Market Rents and a tenant is allowed to pay up to 40% of income if they choose a rental property that has a higher rent than the Payment Standard. If the contract rent is increased after the first year and the unit meets Rent Reasonableness, assisted tenants are allowed to pay a higher portion of their income if they choose to remain in the rental property rather than move to a lower cost unit.

Section 202/811 Housing for Elderly or Handicapped Housing

Under this federally administered program, direct loans are made to eligible, private nonprofit organizations and consumer operative sponsors to finance development of rental or cooperative housing facilities for occupancy by elderly or handicapped persons. The interest rates on such loans are determined annually. Section 8 funds are made available for all of the Section 202 units for the elderly. Rental assistance for 100% of the units for handicapped persons has also recently been made available. Section 811 can be used to develop group homes, independent living facilities, and intermediate care facilities.

Private, nonprofit sponsors may qualify for Section 202 no-interest capital financing loans. Households of one or more persons, the head of which is at least 62 years old or is a qualified non-elderly handicapped person between the ages of 18 and 62, are eligible to live in these units.

Housing Opportunities for Persons with AIDS (HOPWA)

The federally administered HOPWA program provides entitlement and competitive grants for housing assistance and supportive services for persons with AIDS. Funds can be used for:

- Acquisition, rehabilitation, lease, and repair of facilities
- New construction
- Project-based or tenant-based rental assistance
- Planning and support services
- Operating costs
- Short-term rent, mortgage, and utility payments
- Administrative expenses

Supportive Housing

The Supportive Housing Programs provide grants to public and private non-profit entities to promote the development of supportive housing and services. These grants are disbursed by HUD. Funds may be used for: acquisition of property; rehabilitation; new construction (under certain limitations); leasing of structures; operating and supportive services costs; and rental assistance.

Federal Emergency Solutions Grants (FESG)

This federal program provides grants to (1) engage homeless individuals and families living on the street, (2) improve the number and quality of emergency shelters for homeless individuals and families, (3) help operate these shelters, (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. Metropolitan cities, urban counties and territories may provide ESG funds to projects operated by units of general-purpose local government or private nonprofit organizations.

b. State Resources and Programs

Affordable Housing and Sustainable Communities Program (AHSC)

This state program is administered by the Strategic Growth Council and implemented by the California Department of Housing and Community Development (State HCD). The AHSC Program funds land-use, housing, transportation, and land preservation projects to support infill and compact development that reduce greenhouse gas (GHG) emissions. Funding for the AHSC Program is provided from the Greenhouse Gas Reduction Fund (GGRF), an account established

to receive Cap-and-Trade auction proceeds. The AHSC Program will assist project areas by providing grants and/or loans, or any combination thereof, that will achieve GHG emissions reductions and benefit Disadvantaged Communities through increasing accessibility of affordable housing, employment centers, and key destinations via low-carbon transportation resulting in fewer vehicle miles traveled (VMT) through shortened or reduced trip length or mode shift from Single Occupancy Vehicle (SOV) use to transit, bicycling, or walking.

CALHOME

CalHome enables low- and very low-income households to become or remain homeowners. Eligible activities include predevelopment, site development, and site acquisition for development projects; rehabilitation and acquisition and rehabilitation of site-built housing, and rehabilitation, repair, and replacement of manufactured homes; and down payment assistance, mortgage financing, homebuyer counseling, and technical assistance for self-help.

California Emergency Solutions And Housing (CESH)

CESH Program provides funds for a variety of activities to assist persons experiencing or at risk of homelessness as authorized by SB 850 (Chapter 48, Statues of 2018). State HCD administers the CESH Program with funding received from the Building Homes and Jobs Act Trust Fund (SB 2, Chapter 364, Statutes of 2017). CESH funds may be used for five primary activities: housing relocation and stabilization services (including rental assistance), operating subsidies for permanent housing, flexible housing subsidy funds, operating support for emergency housing interventions, and systems support for homelessness services and housing delivery systems. In addition, some administrative entities may use CESH funds to develop or update a Coordinated Entry System (CES), Homeless Management Information System (HMIS), or Homelessness Plan.

Golden State Acquisition Fund (GSAF)

GSAF combined with matching funds, makes up to five-year loans to developers for acquisition or preservation of affordable housing.

HOMEKEY

Homekey funds will be made available to purchase and rehabilitate housing, including hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or permanent, long-term housing. Awarded funds must be used to provide housing for individuals and families experiencing homelessness or at risk of experiencing homelessness and who are impacted by the COVID-19 pandemic.

Eligible activities include acquisition or rehabilitation of motels, hotels, or hostels; master leasing of properties; acquisition of other sites and assets, including purchase of apartments or homes, adult residential facilities, residential care facilities for the elderly, manufactured housing, and other buildings with existing residential uses that could be converted to permanent or interim housing; conversion of units from nonresidential to residential in a structure with a certificate of occupancy as a motel, hotel, or hostel; purchase of affordability covenants and restrictions for units; relocation costs for individuals who are being displaced as a result of rehabilitation of existing units; and capitalized operating subsidies for units purchased, converted, or altered with funds provided pursuant to Health and Safety Code (HSC) section 50675.1.1.

Infill Infrastructure Grant Program (IIG)

The purpose of the IIG Program is to promote infill housing development by providing financial assistance for Capital Improvement Projects that are an integral part of, or necessary to facilitate the development of, a Qualifying Infill Project or a Qualifying Infill Area. To be eligible for funding, a Capital Improvement Project must be an integral part of, or necessary for the development of either a Qualifying Infill Project or housing designated within a Qualifying Infill Area. Eligible costs include the construction, rehabilitation, demolition, relocation, preservation, and acquisition of infrastructure.

Joe Serna, Jr. Farmworker Housing Grants (FWHG)

FWHG funds are to be used to finance the new construction, rehabilitation, and acquisition of owner-occupied and rental units for agricultural workers, with a priority for lower-income households. Activities incurring costs in the development of homeowner or rental housing for agricultural workers, including land acquisition, site development, construction, rehabilitation, design services, operating and replacement reserves, repayment of predevelopment loans, provision of access for the elderly or disabled, relocation, homeowner counseling, and other reasonable and necessary costs are eligible.

Local Early Assistance Program (LEAP)

The Local Early Assistance Program (LEAP) provides grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that accelerate housing production, and /or facilitates compliance to implement the 6th cycle Regional Housing Needs Assessment.

Local Housing Trust Fund (LHTF)

LHTF assistance is to be used to provide matching funds to local and regional housing trust funds dedicated to the creation, rehabilitation, or preservation of affordable housing, transitional

housing, and emergency shelters. Eligible Activities include Loans for acquisition, predevelopment expenses and development of affordable rental housing projects, transitional housing projects, emergency shelters and homeownership projects, including down payment assistance to qualified first-time homebuyers, and for rehabilitation of homes owned by income-eligible homeowners. No more than 20% of each allocation may assist moderate-income households, and at least 30% of each allocation is required to assist extremely low-income households.

Multifamily Housing Program (MHP)

MHP funds are to assist the new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower-income households. Senate Bill 3 (Chapter 365, Statues 2017) authorized the Veterans and Affordable Housing Bond Act of 2018 (Proposition 1). This measure was adopted by voters on November 6, 2018. It authorizes the issuance of bonds in the amount of $1.5 billion for the Multifamily Housing Program (MHP). California Department of Housing and Community Development (HCD) has developed draft MHP guidelines and is seeking feedback from stakeholders and interested parties.

Eligible Activities include new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing, and the conversion of nonresidential structures to rental housing. Projects are not eligible if construction has commenced as of the application date, or if they are receiving 9% federal low-income housing tax credits.

MHP funds will be provided for post-construction permanent financing only. Eligible costs include the cost of child care, after-school care, and social service facilities integrally linked to the assisted housing units; real property acquisition; refinancing to retain affordable rents; necessary on-site and off-site improvements; reasonable fees and consulting costs; and capitalized reserves.

National Housing Trust Fund (NHTF)

NHTF funds assist in new construction of permanent housing for extremely low-income households. Eligible activities are to be used for new construction. Applicants include individuals, joint ventures, partnership, limited partnerships, trusts, corporations, limited liability corporations, local public entities, duly constituted governing body of Indian Reservations or Rancherias or other legal entities or any combination thereof that meet program requirements.

Pet Assistance And Support Program (PAS)

PAS provides funding for qualified homeless shelters to provide shelter, food, and basic veterinary services for pets owned by individuals experiencing homelessness, along with staffing and liability insurance related to providing those services. Eligible uses include shelter, food, and

basic veterinary services for pets owned by individuals experiencing homelessness, along with staffing and liability insurance related to providing those services.

Permanent Local Housing Allocation (PLHA)

The purpose of PLHA funds is to provide a permanent source of funding to all local governments in California to help cities and counties implement plans to increase the affordable housing stock. Funds will help to increase the supply of housing for households at or below 60% of area median income; increase assistance to affordable owner-occupied workforce housing; assist persons experiencing or at risk of homelessness; facilitate housing affordability, particularly for lower- and moderate-income households; promote projects and programs to meet the local government's unmet share of regional housing needs allocation; and ensure geographic equity in the distribution of the funds.

Regional Early Action Planning Grants (REAP)

This program allows councils of governments (COGs) and other regional entities to collaborate on projects that have a broader regional impact on housing. Grant funding is intended to help regional entities and governments facilitate local housing production that will assist local governments in meeting their Regional Housing Need Assessment (RHNA).

TRANsitional Housing Program (THP)

When left without support or resources, young adults aged 18 to 25 years ("transition age youth") can face huge barriers to finding safe, affordable homes. As a result, many of these youth are at extreme risk of falling into homelessness. THP provides funding to counties for child welfare services agencies to help young adults aged 18 to 25 years find and maintain housing, with priority given to those formerly in the foster care or probation systems. (SB 80, Statutes of 2019). Funds shall be used to help young adults who are 18 to 25 years of age secure and maintain housing. Use of funds may include, but are not limited to, identifying, and assisting housing services for this population within each community; helping this population secure and maintain housing (with priority given to those formerly in the state's foster care or probation system); improving coordination of services and linkages to community resources within the child welfare system and the Homeless Continuum of Care; and outreach and targeting to serve those with the most-severe needs.

Veterans Housing And Homelessness Prevention Program (VHHP)

VHHP funds are to be used for acquisition, construction, rehabilitation, and preservation of affordable multifamily housing for veterans and their families to allow veterans to access and maintain housing stability. Funds must be used to serve veterans and their families with at least

50% of the funds awarded shall serve veteran households with extremely low-incomes. Of those units targeted to extremely low-income veteran housing, 60% shall be supportive housing units.

California Housing Finance Agency (CalHFA)

CalHFA offers a variety of loan programs with competitive rates and long-term financing to advance the creation and preservation of affordable housing.

- Permanent Loan Program: CalHFA's Taxable, Tax-Exempt, or CalHFA funded Permanent Loan programs provide competitive long-term financing for affordable multifamily rental housing projects. Eligible projects include newly constructed or acquisition/rehabilitation developments that provide affordable housing opportunities for individuals, families, seniors, veterans, and special needs tenants.

- Conduit Issuer Program: The Conduit Issuer Program is designed to facilitate access to tax-exempt and taxable bonds by developers that seek financing for eligible projects that provide affordable multifamily rental housing for individuals, families, seniors, veterans, or special needs tenants. The conduit bonds may be used to finance the acquisition, rehabilitation, and/or development of an existing project, or they can be used for the construction of a new project.

- Mixed-Income Program: The CalHFA Mixed-Income Program provides competitive long-term subordinate financing for new construction multifamily housing projects restricting units between 30% and 120% of county Area Median Income.

CalHFA offers a variety of loan programs to help California residents purchase a home.

  - California Dream For All Shared Appreciation Loan: The Dream For All Shared Appreciation Loan is a down payment assistance program for first-time homebuyers to be used in conjunction with the Dream For All Conventional first mortgage for down payment and/or closing costs.

Low-Income Housing Tax Credit (LIHTC) Program and Tax-Exempt Bond Financing

The LIHTC financing program subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low- and moderate-income tenants. Through the tax credit program, private investors make cash investments in return for reductions in tax liabilities from the state and/or federal government. The 9% tax credit program is highly competitive and is combined with taxable hard debt. The 4% tax credit program is combined with tax-exempt bonds, which

now has a competitive process for the allocation. This is a complex and competitive financing program, but critical to the long-term financing of affordable/supportive housing developments. Typically, 30% to 50% of total funding needed for a housing development is provided through the federal and state LIHTC financing programs. Local funding must be contributed in order for developers to be competitive in obtaining tax credit and bond financing.

According to the California Tax Credit Allocation Committee, there are 175 LIHTC developments in Orange County, some of which are designated for specific populations. These developments include 15,092 low-income units, with 2 reserved for At-Risk populations, 79 for large families, 30 Non-Targeted, 46 for Seniors, 8 for Special Needs populations, 4 Single Room Occupancy (SRO), and 6 which are not categorized. There are no active LIHTC developments in La Habra, Laguna Niguel, or Rancho Santa Margarita.

California Mental Health Services Act (Proposition 63 of 2004)

The passage of Proposition 63 (now known as the Mental Health Services Act or MHSA) in November 2004, provides the first opportunity in many years for the California Department of Mental Health (DMH) to provide increased funding, personnel and other resources to support county mental health programs and monitor progress toward statewide goals for children, transition age youth, adults, older adults and families. The Act addresses a broad continuum of prevention, early intervention and service needs and the necessary infrastructure, technology and training elements that will effectively support this system.

This Act imposes a 1% income tax on personal income in excess of $1 million. Statewide, much of the funding is provided to county mental health programs to fund programs consistent with their local plans. MHSA funding has been approved to facilitate development, acquisition, or rehabilitation of permanent supportive housing for the target population.

c. Local and Private Resources and Programs

Redevelopment Tax Increment Funds

On December 29, 2011, the California Supreme Court (the Court) issued its opinion in *CRA v. Matosantos*, regarding the constitutionality of AB1X 26 & 27. In their opinion, the Court upheld the provisions of AB1X 26, effectively eliminating redevelopment agencies statewide, but struck down AB1X 27 the legislation that would have allowed redevelopment agencies to continue so long as they provided payments to the State. Pursuant to California Health & Safety Code Section 34170 et seq., the Orange County Development Agency was officially dissolved on February 1, 2012. As a result of that action, redevelopment funds are no longer available as leverage for use with CDBG and/or HOME funds. A Housing Successor Agency (HSA) was

established to wind down all remaining financial obligations of the Orange County Development Agency (OCDA).

Affordable units produced or substantially rehabilitated through support by the former Orange County Development Agency's Housing Set Aside Fund from 2006 to 2020 are identified in **Table 5-4**:

Table 5-4
Affordable Housing Assisted with Former OCDA Funds – 2006-2020

Project Description	OCDA Restricted Units	Total New Units Produced
Cornerstone Apartments	37	48
Bonterra Apartment Homes	82	94
Stonegate I Apartments	27	38
Stonegate II Apartments	15	38
Avenida Villas	17	29
Dorado Senior Apartments	103	150
Montecito Vista Apartments	11	162
Stratford Place and Windsor Court	85	86
Granite Court Apartments	24	71
Woodbury NE Apartments	62	150
Buena Vista Apartments	17	17
Potter's Lane	15	15
Placentia Veterans Village	24	24
Della Rosa	24	50
Oakcrest Heights	3	54
Salerno at Cypress Village	25	25
Total	**571**	**1,051**
Source: OC Community Resources, 2023		

Based on the uncertainty of the HSA funds, and the ability to monitor and maintain the existing HSA assets, it is unknown how many new affordable units will be created through HSA funds in the future.

Kennedy Commission

The Kennedy Commission is a community-based non-profit formed in 2001 as an all-volunteer organization. The focus of this group is to develop housing solutions that affirm the dignity of families with very low- and extremely low-incomes and unites communities across Orange County to develop homes affordable to all.

Orange County Housing Trust (OCHT)

OCHT is a fully qualified 501(c)(3) nonprofit private capital-funded trust dedicated to increasing the supply and availability of permanent supportive housing units and affordable housing developments in Orange County to prevent homelessness. With renewed interest to solve the homelessness crisis in Orange County, Orange County Business Council approached NeighborWorks Orange County to work together to retool OCHT and seek donations from the private sector interested in making a difference. Their focus is to provide gap financing for the acquisition, development, or construction of supportive and affordable housing projects for developers who share our vision of ending homelessness in Orange County. In March 2023, the OCHFT was awarded a $4 million grant from CalOptima Health for the purpose of creating and operating an ADU Loan program. The program is designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences in aims to expand access to income opportunities for homeowners while also providing much needed affordable rentals exclusively for very low-income tenants with a priority on Section 8 voucher holders.

Housing Funding Strategy

The 2018 Orange County Housing Funding Strategy (2018 Strategy) outlines a bold vision of the creation of 2,700 supportive housing units over seven years (through 2025) as well as a need to create additional affordable housing. Investments in housing developments throughout Orange County have been an urgent priority and there has been catalytic investment in supportive housing opportunities over the last four years.

In December 2022, the Board received and filed the 2022 Orange County Housing Funding Strategy Update (HFS Update) which is based on the 2022 Point In Time (PIT) Count and maps out the progress that has been made toward the 2,700 unit goal under the 2018 Strategy, as well as provides an analysis of federal, state, and local resources available to produce affordable and supportive housing. The HFS Update further outlines the recommendations for a strategic approach to achieve an updated goal of developing 2,396 supportive housing units from 2022 to 2029. Orange County's strategic responses to homelessness and the California housing crisis is seen in the considerable progress that has been made in supportive and affordable housing production locally. In addition, the HFS Update provides an overview of current development costs, which rose significantly over the last four years, as well as the success of the County in leveraging of locally invested resources to create new supportive housing as well as general affordable housing in the region.

Orange County Housing Finance Trust (OCHFT)

The Orange County Housing Finance Trust (OCHFT) was formed in 2019 as a joint powers authority between the County of Orange and the cities throughout the county. OCHFT was

created for the purpose of funding housing, specifically assisting persons experiencing homelessness and persons and families of extremely low-, very low-, and low-income within the Orange County.

Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family size and requires U.S. citizenship and specified categories of non-citizens who have eligible immigration status. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live. By law, a PHA must provide 75 % of its voucher to applicants whose incomes do not exceed 30 % of the area median income. Median income levels are published by HUD and vary by location.

County's Mortgage Assistance Program

The County's Mortgage Assistance Program (MAP) provides silent (deferred payment) down payment assistance loans to assist low-income first-time homebuyers (FTHB). Eligible FTHB's annual income must not exceed 80% of the Area Median Income (AMI). The loans are designed to help with the down payment to purchase a home. The 3% simple interest, deferred payment loan has a 30-year term and a maximum loan amount of $80,000. Homebuyers must occupy the property as their primary residence. There is a 1% minimum down payment requirement for this program and the total sales prices shall not exceed 85% of the Orange County median sales price for all homes. All applicants are required to attend a homebuyer education workshop. This program is available to eligible families in the Unincorporated County areas and in several participating cities.

Updated MAP policies and guidelines were approved by the Board of Supervisors on August 25, 2020. Eleven (11) households received a loan from the MAP during the 2013-2021 planning period.

Summary of Quantified Objectives

The following tables summarize the quantifiable objectives arising from the various programs.

1. New Construction

The County's quantified objectives for new construction are shown in **Table 5-5** and reflects the remaining RHNA after accounting for projects developed or under development and projected ADU development. It should be noted that achievement of these objectives will be dependent on many factors beyond the County's control, such as funding availability, interest rates, and general economic conditions.

Table 5-5
New Construction
Quantified Objectives Summary 2021-2029

Program	Extremely Low	Ex/Very Low	Low	Moderate	Above Moderate	Total
Objective	1,450 units	1,450 units	1,624 units	1,876 units	1,553 units	7,953 units

2. Rehabilitation

The County's rehabilitation program was inactive during 2014-2022. OC Community Resources is continuing to work towards the development of a new single-family rehabilitation program for Unincorporated Orange County.

3. Preservation/Assistance

The County's objectives for preservation and assistance programs are shown in **Table 5-6**.

Table 5-6
Preservation and Assistance
Quantified Objectives Summary, 2021-2029

Program	Extremely Low	Very Low	Low	Moderate	Above Moderate	TOTAL
Continuum of Care (CoC)[1]	526	45	0	0	0	571
Housing Choice Vouchers (HCV)[1]	10,065	32	0	0	0	10,097
TOTAL	**10,591**	**77**	**0**	**0**	0	**10,668**

[1]CountywideSource: OC Community Resources 2021. Projected number of occupancy units is the average between projected and actual active CoC and HCV Program participants from the previous period (2013-2021).

APPENDIX A: EVALUATION OF THE 2013-2021 HOUSING ELEMENT

Section 65588(a) of the *Government Code* requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This appendix contains a review the housing goals, policies, and programs of the previous Housing Element and evaluates the degree to which these programs have been implemented during the previous planning period, 2013 through 2021. The findings from this evaluation have been instrumental in determining the County's Housing Action Plan.

A. Program Evaluation

Table A-1 summarizes the County's accomplishments in implementing the programs contained in the previous Housing Element. **Table A-2** shows units built from January 1, 2013 through December 2021. Accessory dwelling units and market-rate apartments have been assigned to the low-income category based on prevailing rents. **Tables A-3** and **A-4** summarize the County's progress in meeting the quantified objectives from the previous Housing Element. For new construction, only units with affordability covenants have been included in the very low and low categories.

Special Needs Accomplishments

The County 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 5th Cycle, the County completed a number of key programs to support housing opportunity and made substantial progress towards many of its programs. The County's successful programs have been identified as continued or modified for the 6th Cycle, due to their success in the 5th 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 County's prior program accomplishments, achievements related to special needs populations are summarized below:

Seniors

According to recent American Community Survey estimates, there were 27.4% of owner households and 16.3% of renter households in Unincorporated Orange County where the householder was 65 or older. The housing needs of this group can be addressed through smaller units, accessory dwelling units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs.

Senior housing projects are a permitted use within any residential zoning district. The Zoning Code also provides a density bonus for the construction of senior housing projects.

Additionally, the Section 8 Housing Choice Voucher Programs (administered by the Orange County Housing Authority or OCHA) and Continuum of Care/Shelter Plus Care Certificate Grants provide monthly housing assistance payments to owners of rental properties in order to assist extremely low and very low-income families, elderly, and disabled persons with their rent. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.

Persons with Disabilities

As shown in Section 2, disabilities are relatively rare within Orange County in the under 65 age groups – typically 2% or less of the population. However, among seniors the incidence of disabilities increases significantly. Nearly 18.7% of persons in this age group reported an ambulatory difficulty, while more than 14% had an independent living difficulty.

The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.

Large Households

Large households are defined as those with five or more members. About 16% of renter households and about 15% of owner households within Unincorporated Orange County had five or more members. This data, together with overcrowding statistics, indicates that although a large proportion of households are small, there is a significant need for large rental units with four or more bedrooms.

Orange County worked with developers during the 5th Cycle to identify constraints and discuss strategies to incorporate large family units. Additionally, the County worked with developers to identify constraints to providing family units and how best to address them. The Orange County Housing Opportunities Overlay Zone provides incentives for the development of affordable housing on commercial sites in the Unincorporated County by providing administrative approval of entitlements and by-right development.

Farm Workers

As previously discussed, farm workers are not a significant portion of the Unincorporated Orange County community. Recent Census Bureau estimates reported about 5,000 persons employed in agricultural occupations in Orange County. About 6% of those farm workers live in Unincorporated County areas.

Their needs are accommodated through housing programs and policies that assist lower-income households in general rather than specialized programs, such as:

- Strategy 2a (rehabilitate deteriorated units). The County utilizes Federal Community Development Block Grant (CDBG) and State CalHome Funds to assist low-income households with needed repairs to their homes.
- Strategy 1a (encourage affordable housing opportunities). The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.
- Strategy 1f (support development of permanent supportive and transitional housing).

Single-Parent Households

For Orange County as a whole, single parents represent 5.2% of householders, according to 2019 ACS 5-Year Estimates. There are 41,777 single-mother households and 12,508 single-father households in Orange County (4% and 1.2%, respectively).

The County amended its Housing Opportunities Overlay Zone regulations in 2009 to provide incentives for the inclusion of child care facilities within affordable housing developments.

Single-room occupancy (SRO) units often provide a more affordable housing option for single-parent households which shared facilities to cut down on expenses and other costs. One SRO-type facility has been built in the Unincorporated County areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Persons Experiencing Homelessness

The County has estimated the number of homeless persons in the Unincorporated County areas based on the data collected in the 2019 Point-In-Time (PIT) Count. As of 2019, there were approximately 43 individuals experiencing homelessness in the Unincorporated County areas, in shelter programs and on the streets and places not meant for human habitation.

- The County achieved the following milestones within the County's 10-Year Plan to End Homelessness (Ten-Year Plan):In May 2016, the Board of Supervisors created the Office of Care Coordination to engage the entire Orange County region by working with cities and community-based organizations to coordinate public and private resources to meet the needs of the homeless population in Orange County and improve the overall countywide response to homelessness. October 2016, the Director of Care Coordination produced an Assessment of Homeless Services in Orange County that outlined findings, recommendations, and next steps for Orange County. This Assessment served as the next steps and measured the progress to date of the Ten-Year Plan.
- In April 2018, the Director of Care Coordination presented an update to the Assessment of Homeless Services in Orange County and provided next steps to building the County's System of Care, which promotes regional collaboration and coordination to meet the unique needs of people experiencing homelessness in Orange County.
- In November 2019, the Board approved a re-organization that consolidated the Office of Care Coordination and the Homeless Services unit into one, allowing for the better operationalization of policy to effectively address homelessness.
    - As of January 2021, a network of nonprofit organizations and local governments operates 59 emergency shelter programs (including those operating in response to COVID-19), 42 transitional housing programs, and 31 permanent supportive housing programs within the Orange County region. Specifically, the County, individual jurisdictions, and numerous agencies oversee a total of 2,857 beds in emergency shelters, 899 beds in transitional housing shelters and 2,602 beds in permanent supportive housing settings. Currently, 646 permanent supportive housing and affordable housing units are under development.

Unlike cities, the County plays a regional role in providing services to persons and families experiencing homelessness. The County-contracted facilities, such Bridges at Kraemer Place and the Yale Navigation Center that provides emergency shelter for adults experiencing homelessness, is located outside of the County's jurisdictional boundary but serves individuals from throughout the County, including the Unincorporated areas. In addition, the Orange County

Office of Care Coordination coordinates the grant application process through which local homeless service providers receive over $23 million in federal funding annually for the Continuum of Care Program. The Orange County Office of Care Coordination also serves as the administrative entity for the Orange County Continuum of Care for State funding to address homelessness.

Additionally, the County funds the operations of two year-round emergency shelter programs for individuals experiencing homelessness, Bridges at Kraemer Place, and the Yale Navigation Center. Bridges at Kraemer Place provides 200 beds of emergency shelter in the North Service Planning Area and the Yale Navigation Center provides 425 beds of emergency shelter in the Central Service Planning Area. Both programs have a large emphasis on housing focused case management and supporting participants in accessing needed resources and supportive services to assist them in securing appropriate housing options. The County is committed to supporting cities that operate their own emergency shelters and promoting coordination to increase access to shelter beds amongst the unsheltered population. There is one year-round program located in the Unincorporated County. American Family Housing leases space to the Illumination Foundation for the provision of 18 transitional housing units in Midway City.

Extremely low-income households

To calculate projected housing needs of the 6th Cycle, jurisdictions are to assume 50% of its very low-income regional housing need are extremely low-income households. As a result, from the very low-income need of 46,416 units, Orange County as a whole, has a projected need of 23,208 units for extremely low-income households. The projected need for low-income households in the Unincorporated County areas is 3,107. Thus, applying this same assumption to the Unincorporated County areas, the projected need for extremely low-income households is 1,554.

The Housing Action Plan Strategy addresses the needs of extremely low-income households. However, it must be recognized that the development of new housing for the lowest income groups typically requires large public subsidies, and the level of need is greater than can be met due to funding limitations, especially during these times of declining public revenues.

In June 2018, the Board of Supervisors approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board of Supervisors also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in Mental Health Services Act (MHSA) funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built, 816 units

under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of over 2,700 supportive and affordable housing units throughout the county by 2025.

One Single Room Occupancy (SRO)-type facility has been built in the Unincorporated County areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Housing Opportunities Overlay Zone

The Housing Opportunities Overlay Zone (HOO) regulations have been in effect since February 2006. The HOO initially allowed multifamily residential development by-right at a density of 25 units per acre, excluding density bonus, in commercial and industrial zoning districts. Since that time, eight multifamily projects with a total of 421 affordable units have been approved under the HOO regulations (see **Table B-1** for project details). In order to encourage use of HOO development opportunities, Implementation Action 1a. of the previous Housing Element called for expansion of the HOO to include parcels conventionally zoned for multifamily (i.e., R2, R3, R4 and RP). The Zoning Code amendment for that expansion was adopted by the Board of Supervisors on December 9, 2008. In 2020, the HOO was amended again to increase the base density to 43.5 units per acre on eligible parcels. In September 2022, the HOO was amended again to increase the base density from 43.5 to 70 units per acre, excluding any applicable density bonus units.

B. Progress in Meeting Quantified Objectives

Tables A-2 through **A-5** summarize the County's progress in meeting the quantified objectives from the previous Housing Element.

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
1. New Housing Production			
Strategy 1a. Establish affordable housing production as one of the County's highest priorities.	Maintain and expand affordable housing as a priority for the County.	The County successfully aided in the development of affordable housing units across Unincorporated Orange County throughout the 5th Cycle. In 2014, the Board approved Notices of Funding Availability (NOFA) for project-based vouchers and funding remained open throughout 2019 to assist in the development of supportive housing throughout Orange County. As shown in Table 2-35, a total of 21 affordable housing projects constructed between 2020 and 2023 were funded in part or in whole through the 2020 NOFA. These affordable housing developments funded through the 2020 NOFA include 1,318 housing units which span multiple levels of affordability from 20% up to 80% of AMI. 1. In December 2019 the Board authorized issuance of the 2020 Supportive Housing NOFA for funding and project-based vouchers to facilitate the development of permanent supportive housing throughout Orange County, including Unincorporated areas. OCCR released the 2020 NOFA on January 27, 2020, making $10 million in Mental Health Services Act (MHSA) funds, $3 million in Home Investment Partnership Act (HOME) and Housing Successor Agency (HSA) funds and 200 Housing Choice Project-Based Vouchers (PBVs) available for the development of supportive housing units. The Board approved increases to the NOFA in funding and vouchers to accommodate funding additional projects. The 2020 NOFA is an open process and applications are accepted on a first-come, first-served basis. HCD received 15 applications requesting 307 PBVs and approximately $18.2 million in combined requests. In March 2023, the Board authorized the issuance of the 2023 Supportive Housing NOFA for funding and project-based vouchers to facilitate the development of supportive housing throughout Orange County, including Unincorporated areas. 2. In March 2019, the Board approved the Orange County Housing Finance Trust (OCHFT) Joint Powers Agreement to facilitate the development of permanent supportive housing in Orange County. The County is a member of the OCHFT along with 23 Orange County Cities. In January 2020, OCHFT Board approved issuance of the 2020 Permanent Supportive Housing NOFA. In May 2020, the OCHFT received a five-year commitment for a total of $ 20.5 million in County Mental Health Services Act funds and a five-year commitment of County General Fund in the total amount of $5 million. Those funds are to be used as sources of matching funds for the Local Housing Trust Fund Program (LHTF). In August 2020, OCHFT applied for LHTF. In October 2020, the OCHFT received notification of an award of more than $4 million for development of permanent supportive and affordable housing units. As shown in Table 2-35, those funds have supported the development of approximately 22 affordable housing projects, including approximately 1,404 housing units between 2020 and 2023.	The County found this program to be successful and has revised this strategy to further encourage housing production through various programs in the Housing Action Plan Programs 1, 2, 3, 4, 5, 7, and 10.

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
		3. OC Public Works, in collaboration with OC Community Resources, received $310,000 of SB2 Planning Grant funds to create various administrative documents that will help establish and promote the newly formed Orange County Housing Finance Trust (OCHFT), and create the first OCHFT business/strategic plan, a website that provides valuable information for the region regarding the OCHFT activities and create a Notice of Funding Availability document to award funds tom developers for the creation of affordable and permanent supportive housing. In addition, the grant funds were used for the Comprehensive Zoning Code Update (adopted by the Board of Supervisors2020) to incorporate current trends in planning and development and comply with State of California law. OC Public Works also received $500,000 in LEAP funds to update the housing element and prepare other documents to accelerate housing production. 4. Home Investment Partnership Program (HOME), Housing Successor Agency or Mental Health Services Act/Special Needs Housing Program and No Place Like Home funds were made available during the reporting period to support affordable housing projects. Collectively, these funds assisted in the development of approximately 22 housing projects, totaling approximately 1,404 housing units between 2020 and 2023. Orange County continues to pursue opportunities to obtain housing grant funds to assist in the development of affordable housing. 5. In June 2018, the Board approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in MHSA funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built 816 units under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of 2,700 supportive and affordable housing units throughout the county by 2025. The units completed to date represent a completion of 84% of the goal. The County will continue working to complete the remaining 16% of this goal during the current planning period.	
	Facilitate the production of affordable units by offering incentives such as density bonus, expedited permit processing,	The County successfully provided incentive opportunities for affordable housing throughout the 5th Cycle. Orange County continued to provide expedited processing and density bonus incentives to affordable housing projects, along with fee or permit waivers, and where appropriate, parking requirement and setback reductions and increased lot coverage and	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	modifications to development standards, tax-exempt conduit financing, infrastructure financing assistance and direct financial assistance in exchange for a proportional commitment to provide units at affordable prices or rents.	building height. The County adopted an ordinance to allow the deferral of development impact fees and to exempt affordable housing projects from local park fees.	
	Work cooperatively with other governmental agencies, business groups, universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County's long-term viability.	The County successfully partnered with multiple agencies throughout the 5th Cycle. OC Community Resources continued to work cooperatively with numerous agencies and organizations to increase public awareness of the importance of affordable housing to the County's long-term viability. As just a few examples, the County created and provided funding for the OC Housing Finance Trust and continued to serve as the regional coordinator for the OC Office of Care Coordination, including hosting fair housing trainings and adopting a Housing Finance Strategy to increase the numbers of supportive housing units, during the planning period.	
	Aggressively pursue all state and federal housing grant funds for which the County is eligible.	Orange County received funds from the SB 2 Planning Grant Program, Local Early Action Planning (LEAP) Program, and Covid ESG and Covid CDBG funds during the reporting period. Orange County continues to pursue housing grant funds. These funding sources are used to fund programs identified in the County's Consolidated Plan, adopted in 2020, throughout the Unincorporated areas, and in the incorporated jurisdictions of Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, San Juan Capistrano, Seal Beach, Stanton, Villa Park, Placentia, and Yorba Linda. The Consolidated Plan prioritizes funding that specifically addresses housing cost-burden, affordable housing stock, funding public infrastructure and facilities in low- and moderate-income neighborhoods, and to fund projects to meet the needs of people with disabilities and those of seniors. The Consolidated Plan's performance is reviewed and evaluated annually to ensure that it continues to allocate available housing grant funds to projects which prioritize the needs of the lower-income and special needs communities within Orange County as a whole.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
Strategy 1b. Ensure that new large-scale development includes a sufficient range of housing types and densities in appropriate locations to facilitate the production of housing for all economic segments consistent with the County's quantified objectives.	Coordinate the location of major housing developments, particularly affordable housing, and multifamily units, with existing and proposed highway and transit routes, major employment centers, shopping facilities and other services. (see Appendix B)	The eight affordable housing projects built since 2006 are located on or adjacent to transportation corridors. For example. Stonegate I and Stonegate II are fully affordable projects located on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 2, 3, 4.
	Establish affordable housing at the Very low-income level as a priority in negotiating development agreements for new planned communities, or renegotiating existing development agreements.	The County continues to negotiate development agreements for new planned communities. The provision of affordable housing will be encouraged in any future negotiated development agreements. However, no new development agreements were negotiated during the planning period.	
	Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing.	The County successfully facilitated the development of new affordable housing units throughout the 5th Cycle. Rancho Mission Viejo Planning Area 3 –commenced development during the planning period. As a condition of approval, 60 acres of land will be dedicated to the County for affordable housing development. To date, Rancho Mission Viejo has constructed 107 affordable dwelling units in Planning Area 1 and 112 affordable dwelling units in Planning Area 2. Seventy percent (70%) of these units are reserved for low-income households and 30% are reserved for very-low-income households. Pursuant to Addenda No. 1 (2013) and No. 2 (2016) of the AHIA, Rancho Mission Viejo has satisfied 15.6 acres of the required 60 acres. Planning Area 3, which is currently under development, is anticipated to satisfy 26.4 acres of land for affordable housing.	
	To assist the development of housing for lower-income households on larger sites, the County will facilitate parcel maps and/or lot line adjustments resulting in parcel sizes that facilitate multifamily developments affordable to lower-income households in light of state, federal and local financing programs (i.e., 2-10 acres). The County will	Orange County will continue to provide information regarding potential sites available for the development of affordable housing projects. During the planning period, the County developed informational handouts regarding Accessory Dwelling Units/Junior Accessory Dwelling Units, as well as Affordable Housing Development Preliminary Applications to highlight opportunities for development of housing for lower-income households and to ease the application and permitting process for applicants. Additionally, the County developed an SB9 Guidance Document, which provides information on additional opportunities for owners of larger lots to both split their lots and develop additional housing on existing lots through a streamlined approval process and presents an opportunity for the development of additional affordable housing units on both smaller and larger than average parcel sizes. The County also offered the following incentives to affordable housing	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	work with property owners and affordable housing developers to target and market the availability of sites with the best potential for development. In addition, the County will offer incentives for the development of affordable housing.	developers: density bonuses, fee reductions or waivers, reduced parking space and setback, increased lot coverage and building height, and expedited permit processing.	
Strategy 1c. Work with cities, community organizations and neighborhood groups to facilitate redevelopment and infill housing development in conjunction with neighborhood revitalization and annexation of Unincorporated islands.	Continue to review Unincorporated islands and identify priority areas with the highest potential for affordable housing development and annexation. (See Appendix C.)	In 2010, the Orange County Local Agency Formation Commission (LAFCO) developed the "Unincorporated Islands Incentive Program and Strategy Handbook" to facilitate annexation of Unincorporated islands. The implementation of that guidance for the annexation of Unincorporated islands resulted in the annexation of a substantial portion of Unincorporated areas into incorporated jurisdictions during the planning period.	The County found that this program was insufficiently specific to adequately quantify achievements; therefore, this strategy has been replaced with Program 4.
Strategy 1d. Ensure that the County's policies, codes, development review procedures and fees do not represent unjustified constraints to the development of new housing.	Continue to support the Development Processing Review Committee in reviewing existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production.	The Orange County Development Processing and Review Committee (DPRC), made up on development stakeholders, continues to review and work with County staff to modify, if necessary, application and permit review and approval processes. The County successfully supported the DPRC in reviewing permitted fees and review processes throughout the 5th Cycle.	The County found this program to be successful and has revised this strategy to further encourage housing production through Program 2.
	Amend the Zoning Code provisions regarding accessory dwelling units in conformance with state law (AB 1866).	In accordance with the October 2019 passage of AB 68, AB 881, AB 587, AB 671 and SB 13, the Board of Supervisors adopted the Comprehensive Zoning Code Update, which addresses the requirements on ADUs, making the process ministerial and less restrictive to homeowners. The County successfully adopted the Comprehensive Zoning Code Update to address ADUs in the 5th Cycle and, as such, this action is complete.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
Strategy 1e. Pursue policy changes at the state level to remove barriers to the production of affordable housing.	Seek concurrence from the Department of Housing and Community Development that affordable units built in cities and assisted with County funds should be partially credited toward the County's housing production for RHNA purposes in proportion to the amount of County funding.	The County successfully coordinated 2 RHNA Transfer Agreements throughout the 5th Cycle, as well as developed a policy on pursuing future RHNA Transfers. A mutually agreed upon RHNA Transfer Agreement between the City of Santa Ana and the County of Orange for the transfer of twenty (20) very low-income units, and twenty-two (22) moderate-income units was approved by the Southern California Association of Governments in June 2021. Another mutually agreed upon RHNA Transfer Agreement between the City of Placentia and the County of Orange for the transfer of twelve (12) very low-income units, and twelve (12) moderate-income units was approved by the Southern California Association of Governments in July 2021. The County of Orange developed a policy on pursuing RHNA Transfers related to annexations, acquisitions and affordable housing projects funded by the County, and will continue to implement that policy going forward.	The County found this strategy to be successful and will continue to pursue RHNA Transfers. In addition, because the County found this program to be successful, the County has revised this strategy to further encourage housing production through Programs 3 and 4.
	Aggressively pursue tax-exempt bond and low-income tax credit allocations to ensure that Orange County receives its fair share of statewide funding under these programs.	Orange County staff continues to work with developers on a project-by-project basis to leverage County resources to compete for available tax credits and funding from the State.	
	Support legislative reform to strengthen anti-NIMBY laws and to reduce the chilling effect of defect litigation on multifamily and condominium housing production.	Orange County staff continues to monitor legislation that may increase obstacles to affordable housing development, and to support or oppose legislation as appropriate.	
	Support changes to the California Environmental Quality Act that would allow streamlined procedures in urbanized Unincorporated areas similar to those available in cities.	Orange County staff will continue to monitor legislation that may streamline CEQA procedures for projects in the Unincorporated areas, and to support legislation as appropriate.	
Strategy 1f. Ensure that family units are encouraged in new	Encourage developers seeking development agreements to include family rental housing as a part of the developments	The provision of affordable housing will be encouraged in any future negotiated development agreements. No new development agreements were negotiated during the planning period.	The County found that this program to be successful and has revised this strategy to

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
affordable housing development, particularly for large families.	proposed. Seek the goal that 10% of new rental units will be for large families.		encourage housing production through Programs 3 and 4.
	Continue to support County funding criteria to encourage the addition of large family units in new construction projects.	Large family units will continue to be accommodated as appropriate.	
	Develop new financial and/or site standard incentives to encourage affordable housing developers to provide units for large families.	Orange County continues to work with developers to identify constraints to providing family units and how best to address them through the Development Processing Review Committee (DPRC) and on a project-by-project basis. The Orange County Housing Opportunities Overlay Zone provides incentives for the development of affordable housing on commercial and industrial sites in the Unincorporated County by providing administrative approval of entitlements and by-right development.	
	Solicit assistance from affordable housing developers and advocates in identifying potential constraints to the development of family units, including current standards for traffic maintenance, parking ratios or other potential development standards, and submit suggested actions to the DPRC for review.	Orange County continues to work with developers to identify constraints and discuss strategies to incorporate large family units. This includes the County's coordination with developers through the Development Processing Review Committee (DPRC) to identify barriers to development that appear in the development permit process and to address those barriers.	
2. Rehabilitation and Preservation of Existing Neighborhoods			
Strategy 2a. Continue to support programs designed to rehabilitate deteriorated units and encourage the maintenance and minor repair of structurally sound housing units to prevent their deterioration.	Continue to use redevelopment agency housing set-aside funds, federal HOME funds, and other available funding to finance housing rehabilitation.	The County successfully used federal and state funding to assist local households and low-income households throughout the 5th Cycle. The County utilizes Federal Community Development Block Grant (CDBG) and State CalHome Funds to assist low-income households with needed repairs to their homes. The County is continuing to work towards the development of a new single-family rehabilitation program for the Unincorporated Orange County.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Programs 6.
Strategy 2b. Preserve the affordability of federal, state and	Continue to monitor projects with expiring affordability covenants	Orange County continues to work toward preserving the affordability of at-risk units on a project-by-project basis. As a policy, the County attempts to negotiate new agreements to	The County found that this program was insufficiently specific to adequately quantify

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
County-subsidized units threatened with conversion to market rates.	and take appropriate action to preserve these affordable units whenever possible.	extend protections for at-risk units and to preserve their status as affordable when existing agreements near expiration.	achievements, so this program has been replaced with Program 6.
	Continue to assist owners or purchasers of existing Mortgage Revenue Bond (MRB) projects to refund their bonds in exchange for augmented and/or extended affordability controls. Annually contact owners of at-risk units to gauge interest, provide a list of resources available for refund and negotiate terms on a project-by-project basis.		
Strategy 2c. Enhance the quality of existing residential neighborhoods by maintaining public facilities and requiring residents and landlords to maintain their properties in good condition.	Continue the County's code enforcement and graffiti removal programs.	Orange County continues to enforce zoning code and property maintenance requirements throughout the Unincorporated areas, using a complaint-based approach.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6.
	Continue to provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program (CIP).	Orange County continues to provide infrastructure maintenance and improvements in the Unincorporated areas, including upgrades to public infrastructure and public facilities to better meet Americans with Disabilities Act requirements, as well as roadway and flood projects.	
	Continue to participate in the CDBG program.	Orange County continues to participate in the CDBG program, and to facilitate the distribution of CDBG funds in response to applications, using the adopted Consolidated Plan to guide the prioritization of projects that serve affordable housing and special needs populations.	
	Identify existing apartment complexes in need of repair and provide financial assistance or other incentives to encourage the owner to make a substantial investment in rehabilitation and	Orange County continues to research various forms of financial assistance for the repair and rehabilitation of existing housing stock. Housing rehabilitation is an activity eligible for funding through the HOME Investment Partnerships Program (HOME), Community Development Block Grant Program (CDBG), and Section 108 Loans. In Fiscal Year 2021-2022, CDBG funds helped 9 housing rehabilitation projects. HOME funds also assisted in funding housing rehabilitation projects during Fiscal Year 2021-2022.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	ongoing maintenance and guarantee long-term affordability.		
	Review Unincorporated islands and identify three priority areas with the highest potential for affordable housing development.	The County has identified potential sites for the development of affordable housing projects.	
Strategy 2d. Ensure that the conversion of rental units or mobile home parks to ownership or other uses occurs in a responsible manner to protect the rights of both owners and tenants.	Continue to enforce the provisions of the County's condominium and mobile home park conversion ordinance (section 7-9-147).	The County continues to enforce the provisions of the County's condominium and mobile home conversion ordinance (section 7-9-39). During the planning period, no issues of conversion of condominiums and mobile home parks from rental units to ownership or other uses has occurred.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6.
3. Equal Housing Opportunity			
Strategy 3a. Continue to support enforcement of fair housing laws and organizations that provide fair housing information and intervention.	Provide financial assistance from CDBG funds or other sources to fair housing organizations.	Orange County continues to provide financial assistance from CDBG funds, or other sources, to fair housing organizations.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 8.
Strategy 3b. Facilitate the education of residents about their fair housing rights and of the process to make appropriate referrals for fair housing complaints.	Provide federal/state/local information regarding discrimination to residents at family briefing sessions, including applicable Fair Housing Information and Discrimination Complaint Forms. Also maintain bilingual staff to assist non-English speaking families and handicap accessible offices.	Orange County continues to provide information regarding housing discrimination to residents both through online publications and information housed on the OCCR website, and through periodic public information sessions regarding fair housing. The Orange County Board of Supervisors approved the County's 2020-2025 Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan (the Consolidated Plan) on June 23, 2020. The Consolidated Plan identifies priorities for the use of the HOME, CDBG, and ESG funds that the County administers, which includes programs to assist in addressing fair housing issues. The County also partners with the Fair Housing Council of Orange County to provide information on fair housing and housing discrimination. OC Housing Authority's offices are handicap accessible, and the County is more broadly engaged in ensuring that County facilities are accessible, and in making accessibility upgrades to public infrastructure. The County's Community Resources offices maintain bilingual staff to assist non-English speaking families. Additionally, the County partners with 2-1-1, a 24/7	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 8.

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
		telephone resource system that links residents with community health, human services, and support organizations, including fair housing resources.	
	Continue to work with the Orange County Fair Housing Council to provide information and regarding housing discrimination and intervention to resolve complaints. Literature is made available at County and FHC offices.	Orange County continues to work with the Fair Housing Council to provide information to residents and regarding housing discrimination and intervention to resolve complaints. The County hosts fair housing trainings for property managers and owners and posts fair housing information on its website, and the Fair Housing Council of Orange County provides fair housing information both on its website, through workshops and seminars, and in-person at its offices.	
Strategy 3c. Encourage the removal of architectural barriers in existing residential units, and ensure that new units comply with accessibility standards.	Continue to enforce building code provisions requiring accessible design.	Orange County continues to enforce building code provisions requiring accessible design. A reasonable accommodation ordinance was adopted in 2013. For projects requiring discretionary permits, accessibility requirements included in the Building Code are required to be met before a permit can be closed out.	The County found that this program was insufficiently specific to adequately quantify achievements. A strategy to encourage housing production has been included in Programs 1, 2, 3, 4, 5, and 7.
4. Assistance to Persons in Need			
Strategy 4a. Encourage affordable housing opportunities for households with incomes less than 30% of area median income (AMI)~~,~~	Continue to support the County Housing Authority and its participation in the Section 8 Rental Assistance Program and pursue additional Section 8 rental assistance vouchers when available.	The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 2, 3, 4, 5, and 7.
	Continue the goal of producing units affordable at or below 30% AMI in the County's Rental Housing NOFA.	Orange County's NOFA continues to include the goal of producing affordable units to extremely-low-income persons and households.	
	Encourage developers seeking development agreements to include housing units affordable to households with incomes of less than 30% AMI.	The provision of affordable housing will be encouraged in any future negotiated development agreements. No development agreements were negotiated during the planning period.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
Strategy 4b. Provide information and financial assistance to help low- and moderate-income households in obtaining affordable housing.	Continue the Tax -Exempt Single-Family Mortgage Revenue Bond Program for first-time homebuyers.	Orange County continues to provide the Tax-Exempt Single-Family Mortgage Revenue Bond Program for first-time homebuyers.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 3, and 5.
	Continue to publish the Affordable Rental Housing List.	Orange County continues to publish the Affordable Rental Housing List to provide information to lower-income renters. The Affordable Rental Housing List is published on the County's website for easy access and is updated regularly. The Affordable Rental Housing List is published in multiple languages to ensure that all people looking for affordable rental accommodations have access to the same information.	
Strategy 4c. Ensure that all affordable housing assisted with public funds remains affordable for the required time period, and recapture public funds when directly subsidized units are prematurely sold or otherwise withdrawn from the subsidizing program.	Monitor all bond-financed and other subsidized projects annually to verify compliance with affordability covenants.	The County continued to maintain affordability of existing units to the greatest extent possible. Affordable housing projects are monitored on a regular basis to verify continued required affordability.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6. .
Strategy 4d. Continue to support the existing programs that address the needs of those in need of temporary and transitional housing.	Continue to provide assistance as described in the County's Continuum of Care program.	In June 2018, the Board approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in MHSA funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built, 816 units under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of over 2,700 supportive and affordable housing units throughout the county by 2025. To date, approximately 84% of the total unit goal has been met by the units which are completed, in construction, or in the process of funding.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Programs 2 and 4.
	Identify additional sites that are now available or easily made available for transitional shelters	Orange County will continue to provide information regarding the location of sites eligible under its Housing Opportunities Overlay Zone – primarily through information available on the County's website.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	for homeless persons and families.		
5. Energy Conservation			
Strategy 5a. Encourage the use of energy conservation features in residential construction, remodeling, and existing homes.	Continue to require new construction and remodeling projects to meet energy conservation requirements.	Orange County continues to require new construction and remodeling projects to meet energy conservation requirements as a part of permitting and entitlement review.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 2, 3, 4, 5, 7, and 9.
	Provide information regarding energy efficiency measures in the Orange County Housing Opportunities Manual.	The County continues to publicize available assistance programs through the County website and flyers. Information regarding energy efficiency measures continues to be included in the Housing Opportunities Overlay Manual. Sustainable best practices are incorporated in the Comprehensive Update to the Zoning Code, and include various measures, such as the option to use pervious materials in driveways and allowing carport roof solar panels with no additional permit requirements. Additional language is proposed relating to electric vehicle charging stations, "hedges" are added as a type of wall or fence, alternative parking calculations are permitted along with new parking lot landscaping requirements.	
	Provide clients with information regarding "CalGreen" – California's Green Building Code.	Clients receive information regarding CalGreen (green building code) and energy conservation at County of Orange offices and on its websites. The County provides information through the County website and flyers.	
6. Child Care Facilities			
Strategy 6. Amend existing regulations to remove regulatory obstacles for new child care facilities within affordable housing developments	Both the Zoning Code and Housing Opportunities Manual will be amended to allow the provision of child care in affordable housing developments utilizing the Housing Opportunities Overlay Zone program. The County's Child Care Coordinator will be invited to assist in the development of the criteria and requirements for child care facilities and family day care homes. All conditions and require-	Orange County amended its Housing Opportunities Overlay Zone regulations in 2009 to provide incentives (I.e., a density bonus) for the inclusion of child care facilities within affordable housing developments.	The County found that this program was insufficiently specific to adequately quantify achievements. Objectives to encourage housing production have been included in Programs 1, 2, 3, 4, 5, 7, and 9.

Strategy	Action	Accomplishments	6th Cycle Status
	ments applied to this use will be delineated in the Affordable Housing Agreement entered into between the County and developer for each affordable housing development.		

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Multifamily							
Anaheim	Cerritos	R1				60	60
Midway City	Potter's Lane 15352 Jackson	R1				16 37	16 37
Midway City		R3(1950)/35				17	17
Midway City		R3(1950)/35(H)				4	4
Stanton	Stonegate I Stonegate II	C1(H)				38 26	38 26
Rancho Mission Viejo		PC				637	637
Silverado-Modjeska		A1(SR)				2	2
						Total Multifamily	837

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Accessory Dwelling Units							
Anaheim		R1				6	6
Anaheim		R2D				1	1
Costa Mesa		R1				1	1
Coto de Caza		S				1	1
Foothill Trabuco		S				1	1
Los Alamitos (Rossmoor)		R1/28 (C3849)				1	1
Midway City		R1				37	37
Midway City		R3(1950)/35 (H)				3	3
Santa Ana (North Tustin)		100-E4				3	3
Santa Ana (North Tustin)		125-E4-20000				1	1
Santa Ana (North Tustin)		E4				1	1
Santa Ana (North Tustin)		E4-20000				1	1
Santa Ana (North Tustin)		NTSP				3	3
Santa Ana (North Tustin)		R1				4	4
Orange		70-R1				2	2
Orange		E4-1(E)				1	1
Orange		E4-1(SR)(E				1	1
Orange		R4				1	1
Rancho Mission Viejo		PC				2	2

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Santa Ana (North Tustin)		100 - E4				2	2
						Total Accessory Dwelling Units	73
Modular Units							
Orange		R4				1	1
						Total Modular	1
Single Family Units							
Anaheim		R1				28	28
Anaheim		R2D				1	1
Costa Mesa		R1				4	4
Costa Mesa		R4				5	5
Coto De Caza		S				14	14
Foothill-Trabuco		FTSP				7	7
Ladera Ranch		PC				477	477
Laguna Beach (Emerald Bay)		R1(CD)(SR)				28	28
Los Alamitos (Rossmoor)		R1/28 (C3849)				38	38
Midway City		R1				35	35
Midway City		R3(1950)/35 (H)				8	8
Santa Ana (North Tustin)		100-E4				8	8
Santa Ana (North Tustin)		125-E4-20000				8	8
Santa Ana (North Tustin)		E4				8	8

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Santa Ana (North Tustin)		E4-20000				3	3
Santa Ana (North Tustin)		NTSP				5	5
Santa Ana (North Tustin)		R1				1	1
Santa Ana (North Tustin)		R1-18000				1	1
Orange		E4-1				2	2
Orange		E4-1(E)				3	3
Orange		E4-1(SR)(E)				2	2
Orange		R1				1	1
Orange		R1(SR)				4	4
Orange		R1-10000(SR)				1	1
Orange		R4				1	1
Rancho Mission Viejo		PC				2684	2684
Santa Ana (North Tustin)		100 - E4				3	3
Santa Ana (North Tustin)		E4-20000				1	1
Santa Ana (North Tustin)		R1-10000(SR				1	1
Silverado-Modjeska		A1				7	7
						Total Single Family	**3389**

**Lower-income apartments and accessory dwelling units are based on prevailing market rents*
Source: OC Development Services, 2021
Note: Descriptions of zoning districts can be found in Table 3-3

Table A-3
Affordable Housing Projects Completed 2013-2021
Unincorporated Orange County

Project	Status	Location	Zoning	Parcel Size (ac)	Density (du/ac)	Income Level				Total Units
						VL (EL*)	Low	Mod	Above Mod	
Sendero Bluffs	Completed and occupied	Rancho Mission Viejo	PC	2.78	38.4	32	74	0	1**	107
Esencia Norte	Completed and occupied	Rancho Mission Viejo	PC	4.0	28	34	77	0	1**	112
Potter's Lane	Completed and occupied	Midway City	C2	0.41	39	15	0	0	1**	16
TOTALS (deed-restricted affordable units only)						**81**	**151**	**0**	**3**	**235**
					Avg. Density of All Projects	**35.1**				
					Avg. Density of Projects in Housing Opportunities Overlay Zone	**39**				

** Extremely low-income (30% AMI)*
*** Manager's unit (not deed-restricted)*
Source: OC Development Services, 2021
Note: Descriptions of zoning districts can be found in Table 3-2

Table A-3 illustrates the affordable housing projects completed during this reporting period (2013-2021):

- **Esencia Norte** is located at the east side of Esencia Drive between Cow Camp Road and Andaza Street in the Unincorporated community of Ranch Mission Viejo, includes a new construction development of 111 units serving large families with rents affordable to households earning 50-60% of area median income (AMI).
- **Sendero Bluffs** is located at northeast corner of Ortega Highway and Gateway Place in Rancho Mission Viejo, includes a new construction development of 106 units of housing serving seniors with rents affordable to households earning 50-60% of area median income (AMI).
- **Potter's Lane** is a 16-unit affordable housing apartment community per Housing Opportunities Overlay Zone Regulations. The project is two stories, with 15 studio units (480 sq. ft.), and one Manager's Unit (480 sq. ft.). The Project is 100% affordable to low- and very low-income households. Based upon its affordability, the project was eligible for a 35% density bonus and three incentives.

Table A-4
Progress Towards Meeting New Housing Need
Unincorporated Orange County 2013-2021

	Very Low*	Low*	Moderate*	Above Moderate	Total
Total RHNA 2013-2021	0	879	979	2,174	5,272
Quantified Objective	1,240	879	979	2,174	5,272
Total Units Built 2013-2021	81	151	180	4,429	4,841

Table A-5
Preservation and Assistance
Performance Evaluation vs. Quantified Objectives 2013 – 2021

Program	Extremely Low-Income	Very Low-Income	Low-Income	Moderate Income	Above Moderate-Income	TOTAL
Continuum of Care (CoC) (previously referred to as Shelter Plus Care)	444	54	19	83	–	600
% Breakdown	74%	9%	3%	14%	–	100%
Actual	408	50	17	76	–	
% Breakdown	74%	9%	3%	14%	–	100%
Housing Choice Voucher (HCV) (previously referred to as Section 8 Rental Assistance)	5,396	1,466	433	3,810	–	11,105
% Breakdown	49%	13%	4%	34%	–	100%
Actual	4,808	1,314	386	3,386	–	9,894
% Breakdown	49%	13%	4%	34%	–	100%

Source: OC Community Resources / Occupancy data on the actual point in time income levels of active CoC and HCV Program participants is derived from the Income Characteristics Report prepared via Housing Pro on June 2021.
(-) is used to denote that we do not have quantified objectives for Above Moderate housing.

Rehabilitation - Performance Evaluation vs. Quantified Objectives 2013 – 2021

The County's rehabilitation program was inactive from 2013-2022. OC Community Resources is continuing to work towards the development of a new single-family rehabilitation program for Unincorporated Orange County scheduled to begin in 2022.

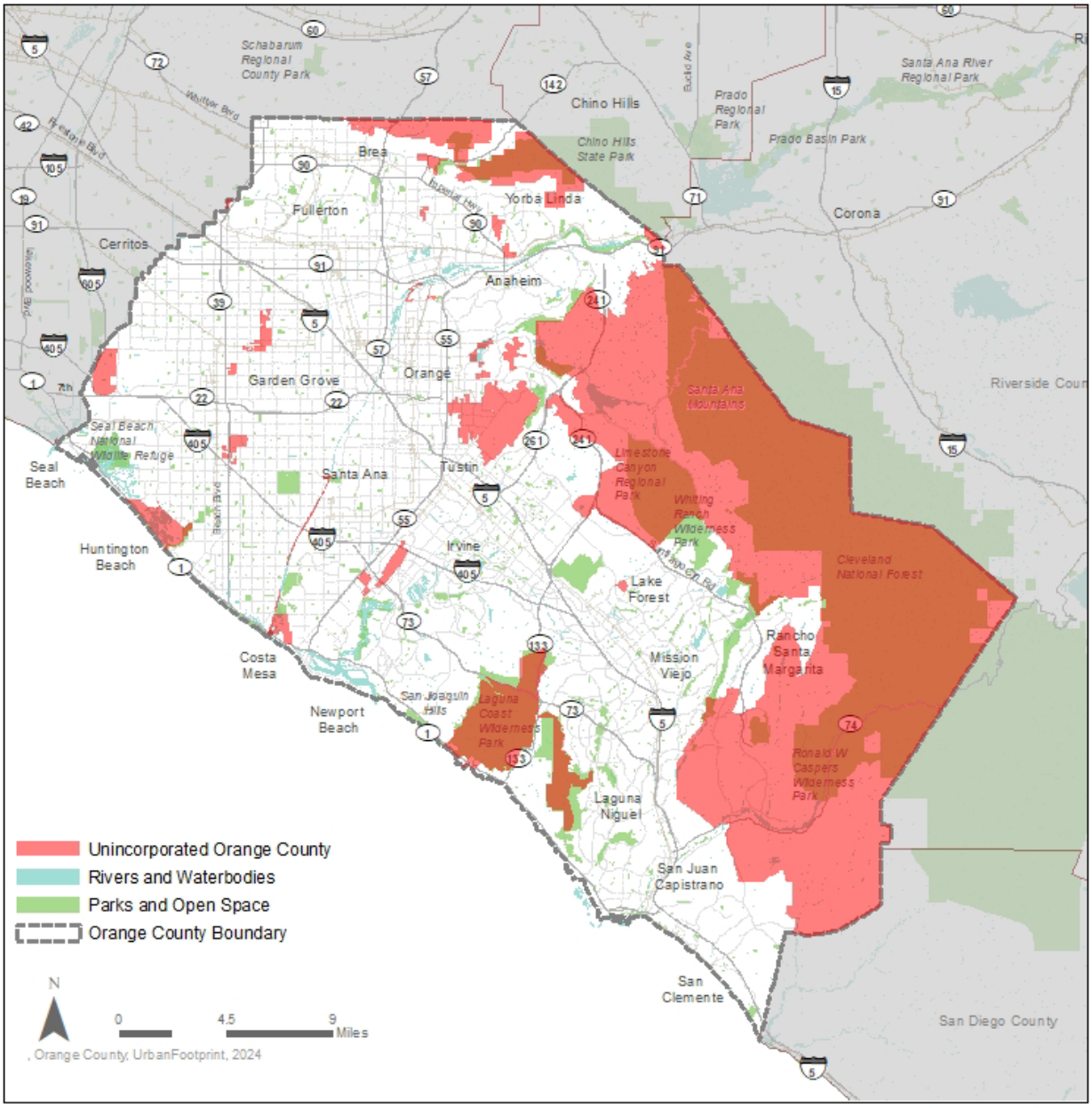
APPENDIX B: LAND INVENTORY

State law requires that jurisdictions include a statement of their goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing. (Gov. Code, Section 65583, subd. (b).) The Housing Element is required to include an inventory of suitable sites for housing development compared to the jurisdiction's assigned share of the region's housing need. Part of this analysis involves identifying adequate sites to accommodate a jurisdiction's share of regional housing needs for all income groups. Adequate sites are those with appropriate zoning designations and development regulations needed to facilitate and encourage the development of a variety of housing for all income levels. The land and program resources available for the development of housing in Unincorporated Orange County are addressed here.

The Unincorporated County

While there are 34 cities in Orange County, this housing element focuses on the Unincorporated area - territory that is not located within a city. Due to the geographic distribution of Unincorporated land, the Housing Element (along with the rest of the General Plan) must address a diverse geographic and socioeconomic area, from small Unincorporated islands surrounded by cities to large, planned communities. Most of the Unincorporated County land area is in the southern portion of the County. In the central and northern parts of the County, there are many small, Unincorporated "islands" of property (see **Figure B-1**). Since 1993, the incorporation of three new cities (Laguna Woods, Rancho Santa Margarita, and Aliso Viejo) together with the annexation of Unincorporated territory to existing cities during this period, have reduced the Unincorporated County area in size by over 40 percent, from approximately 414 square miles to 321 square miles. Also, most of the Unincorporated County areas in the southern part of the County are preserved as open space/agriculture due to the mountainous geography. This leaves limited areas for residential development in areas that are fully or almost fully built out.

Figure B-1
Unincorporated Orange County



The assumptions and methodology for the residential land inventory are provided in this appendix. The sites identified within the Housing Element represent the County of Orange's ability to plan for housing at the designated income levels within the 6th Cycle planning period (2021-2029).

Table B-1 shows the County's 2021-2029 RHNA need by income category as well as a summary of the sites identified to meet that need. The analysis within this appendix shows that the County of Orange has the capacity to meet their 2021-2029 RHNA allocation through a variety of methods, including:

- Identification of development capacity on sites which either currently permit development of residential uses at or above 30 dwelling units per acre.
- Identification of County owned properties suitable for the development of housing.
- Future development of accessory dwelling units (ADUs).

Zoning and Affordable Housing in Orange County

Demand for housing in Orange County, and all Southern California in general, has significantly increased over the past decade due to slow housing production. The County has worked to encourage housing development but is constrained, as are other urbanized jurisdictions, by lack of undeveloped (vacant) land, high land prices, open space deficits, and productive industrial uses that create land use conflicts if too close to residential neighborhoods. All the while, the cost of developing subsidized affordable housing has increased while public funding has decreased. Knowing that the housing needs of County residents and their families have reached a critical pitch, the County has embarked on many programmatic actions to expand the opportunities for new residential development.

The County has established a Housing Opportunities Overlay or "HOO" zoning overlay district that provides for the development of 100% affordable rental housing by-right (without a use permit) within commercial and/or industrial districts, and on building sites zoned for higher density residential uses, and for the establishment of emergency shelters, multi-service centers and low-barrier navigation centers. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning. The County also offers alternative (reduced) parking requirements for residential development within the Housing Opportunities Overlay Zone.

In 2022, the Board of Supervisors adopted a Zoning Code amendment to increase the base density in the Housing Opportunities Overlay Zone from 43.5 to 70 units per acre, excluding any applicable density bonus units and geographically expanded the Housing Opportunities Overlay (HOO). Developers are also able to achieve even higher densities through the State's density bonus provisions. Since the adoption of the Housing Opportunities Overlay Zone, nine projects (within the Housing Opportunities Overlay Zone) with a total of 371 affordable units have been approved, which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families. More than half of those units have been developed in the last ten years. The average density of these projects has been over 40 units per acre. This is significant as the maximum base HOO density at the time of project approval was either 25 units per acre (2006-2020) or 43.5 units per care (2020-2022). Compared to the base density allowed in the HOO at project approval, most projects resulted in densities of over 100%. Overall, the average density for all HOO projects was 134% of maximum allowed density. With a base density increase to 70 units per acre, the potential for new housing development in the HOO is

significant. The HOO projects developed or under development since 2007 is presented in **Table B-14.**

To further encourage development of higher density housing, in 2024, the minimum density for most multi-family zoned areas was increased to 30 units per acre and properties zoned for Local Business (C1), General Business (C2), Commercial Neighborhood (CN), or Residential Profession (RP), were rezoned to the Mixed-Use (MX) zoning designation. The Mixed-Use designation allows stand-alone residential development at a minimum of 30 units per acre density and requires the inclusion of at least 50% residential development for mixed-use projects. Stand-alone non-residential development is not allowed which means that within the mixed-use zone with an HOO overlay, higher density, affordable, stand-alone housing is most likely to develop.

Accommodating the 6th Cycle RHNA in built-out communities like those in the Unincorporated County represents a formidable challenge. Nonetheless, the County has paired this housing resources section with an aggressive set of policies and programs that will work to address the challenge.

Regional Housing Needs Assessment (RHNA) for 2021-2029

The Regional Housing Needs Assessment (RHNA) is a key part of State housing element law (Government Code Section 65580) and is a central factor in satisfying periodic required updates of the housing element. Every city and county in the State of California has a legal obligation to respond to its fair share of the existing and projected future housing needs in the region in which it is located. Housing element law requires local governments to update land use plans, policies, and zoning to accommodate projected housing growth. The RHNA figure is not a projection of residential building permit activities, but of housing need based on regional growth projections and regional policies for accommodating that growth. Although the Housing Element covers the eight-year planning period from October 15, 2021, through October 15, 2029, the 6th projection period spans June 30, 2021, through October 15, 2029.

For the 2021-2029 planning period, the Unincorporated County's RHNA allocation is 10,406 housing units. The 10,406 housing units allocated to the unincorporate area for the 6th RHNA planning cycle is divided as follows: 3,139 housing units for extremely low and very low-income households, 1,866 housing units for low-income households, 2,040 housing units for moderate-income households, and 3,361 housing units for above-moderate-income households.

Every housing element must demonstrate that the local jurisdiction has made adequate provisions to support the development of housing at various income levels (extremely low, very low, low, moderate, and above moderate) to meet its 'fair share' of the existing and projected regional housing need. However, because local jurisdictions rarely, if ever, develop and construct housing units, the RHNA numbers establish goals that are used to guide planning, zoning, and

development decision- making. Specifically, the numbers establish a gauge for determining whether the County is allocating adequate sites at a range of densities to accommodate the development of housing– meeting the County's RHNA. In particular, the County must identify adequate sites for lower-income households that will allow residential uses at a density of at least 30 units per acre.

Local Issues and Trends

The following is a summary of local housing trends, which correlate with the RHNA allocated to the Unincorporated County areas, and illustrate the changing housing needs within the Unincorporated County areas:

- As shown in **Table B-1**, the County has identified 1,707 housing units that have been completed to contribute to the County's efforts to meet its 2021-2029 RHNA.
- Over the last eight years, over 3,779 housing units have been constructed in the Unincorporated County areas, 81 of which serve very low-income households, and 151 of which serve low-income households.
- The County satisfied 91.9% of its quantified objectives for providing Continuum of Care (551 Continuum of Care participants out of the 600-participant objective) between 2013 and 2021.
- The County satisfied 89% of its quantified objective for Housing Choice Voucher participants (9,894 participants out of the 11,105-participant objective) between 2013 and 2021.
- Since 2010, the County's population has become increasingly diverse leading to more diverse housing needs, including creased demand for very low-, low-income, and rental housing options.
- Currently, an estimated 128,421 persons reside in the Unincorporated County areas (DOF 2020), comprising over 42,000 households (estimated based on the American Community Survey 2020, 5-year estimates).
- Housing prices and median gross rent both in the Unincorporated County areas and Orange County as a whole have increased in the time since 2013, indicating a tight housing and rental market in the face of increased demand.
- Despite the Unincorporated County areas' loss of households and population to incorporations and annexations, SCAG forecasts that the Unincorporated County areas will grow by 49.2% over the next ten-year planning period.
- More than 50% of renters in Unincorporated County areas are in overpayment situations, with a smaller percentage of homeowners in Unincorporated County areas being in overpayment situation the Unincorporated County areas is $90,234.

- While most of the housing stock in the Unincorporated County areas is more than 20 years old, only approximately 1% of the housing stock in the Unincorporated County areas is in need of repair or rehabilitation.

Strategies for Meeting the RHNA

Orange County's housing needs will be met through the implementation of a variety of strategies (**Table B-1**). California law requires communities to facilitate the development of housing through land use planning and zoning regulations. State housing element law allows local governments to obtain credits toward meeting its RHNA goal in different ways:

- Units approved, entitled, or constructed that would be available during the RHNA projection period of June 30, 2021, through October 15, 2029
- Accessory Dwelling Units (ADUs) that may be constructed based on a projected trend
- Vacant and nonvacant sites available for residential and mixed-use development during the Housing Element planning period (October 15, 2021, through October 15, 2029)

The primary method for addressing the adequate sites requirement is the identification of available vacant and underutilized sites that are appropriately zoned and likely to develop within this planning period. Following available site identification, sites that would be available for housing once rezoning actions were completed were identified. The following describes the County's approach to addressing its 2021-2029 RHNA as determined by the Southern California Association of Governments (SCAG).

Table B-1
RHNA Strategy Summary

	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
RHNA (2021-2029)	*1,570*	*1,569*	*1,866*	*2,040*	*3,361*	*10,406*
Units approved, entitled, or constructed (Begins June 30, 2021- December 31, 2023)		111	21	10	1,798	1,940
Constructed/Projected ADU Development		128	221	154	10	513
Sites Not Requiring Rezoning		557	-	1,124	2,326	4,007
RHNA Shortfall		**(2,343)**	**(1,624)**	**(752)**	**+773**	
Sites Rezoned		4,266	-	871	-	5,137
RHNA Status: +Surplus/(Shortfall)			***+299***	***+119***	***+773***	

Approved, Entitled, or Constructed Projects

Approved and proposed residential development projects can be credited toward the 2021-2029 RHNA. In Unincorporated Orange County, projects credited towards the RHNA are shown in **Table B-2**. Two projects are affordable:

- Casa Paloma is a fully affordable housing project developed in the Housing Opportunities Overlay Zone and on the site of a previous pottery manufacturing facility. The four-story apartment building consists of 71 units (69 rental units and two managers' units), of which 48 units serve formerly homeless households. The Development consists of 59 one-bedroom units, 10 two-bedroom rental units and two two-bedroom managers' units. Rents for 48 of the units are set at 30 percent of Area Median Income (AMI) and the remaining rental units will be set at 50 percent AMI or below. The project was developed by American Family Housing, a nonprofit affordable housing developer, and financing included a County permanent loan, HCD Housing for a Healthy California funds, and commitment of 48 Housing Choice and/or Mainstream Project Based Vouchers.
- American Family Housing is developing a 65-unit affordable development in the Housing Opportunities Overlay Zone in Midway City. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project qualifies for the unlimited density bonus provision. The project's proximity to a major transit stop also permits use of modified parking standards. The planning application for the Jackson Street project was approved in 2024.

Table B-2
Approved or Entitled Projects (since June 30, 2021)

Project	Extremely-/ Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total	Status
Saddlecrest (SF project)	-	-	-	65	65	Under construction (2024); Expected completion: 2026
Cielo Vista (SF project)	-	-	-	80	80	Under construction (2024); Expected completion: 2026
Esperanza Hills SP (SF project)	-	-	-	340	340	Approved, processing permits; Expected completion: 2028

Table B-2
Approved or Entitled Projects (since June 30, 2021)

Project	Extremely- / Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total	Status
Wass Condo (SF- A project)	-	-	-	10	10	Approved; Expected completion: 2026
Cowan Heights Estate (SF project)	-	-	-	16	16	Under construction (2024); Expected completion: 2026
Casa Paloma (Affordable MF project)	48	21	-	2	71	Constructed (2024)
American Family Housing (Affordable MF project)	63	-	-	2	65	Approved; Expected completion: 2026
Single units approved, entitled, or constructed (June 30, 2021-October 2024)	-	-	10	1,283	12,93	
Total	***111***	***21***	***10***	***1,798***	***1,940***	
Source: County of Orange, 2024 SF: Single Family; SF-A: Single Family Attached; MF: Multifamily						

Constructed/Projected Accessory Dwelling Units (ADUs)

In accordance with State law, the County may credit potential ADUs to the RHNA requirements by using the trends in ADU construction to estimate new production. Between 2018 and 2023, the County has seen steadily increasing ADU activity, with a total construction of 285 units over 6 years:

- 2018 – 23 ADU permits
- 2019 – 21 ADU permits
- 2020 – 50 ADU permits
- 2021 – 57 ADU permits
- 2022 – 60 ADU permits
- 2023 – 73 ADU permits

Looking back at ADU trends for the Unincorporated County, starting in 2018, the County issued 23 ADU permits, followed by 21 permits in 2019, 50 permits in 2020, 57 permits in 2021, 60

permits in 2022, and 73 permits in 2023. From June 2021 through the end of 2023, there were about 162 ADU permits issued. In summary, since 2018 the County has seen a 217% increase in the number of ADU permits issued. The County continues to see year over year growth in ADU applications and ADU permits issued which is a strong indicator that future ADU permits issued will exceed the past rate of production and continue the upward trend. The County is facilitating ADU production through a variety of proactive efforts. For the remaining 5.83 years left in the planning period, an annual estimate of 60 units based on the average permits issued from 2020-2023 (4 years) is used. Given that 73 permits were issued in 2023, this estimate is reasonable and achievable.

SCAG conducted an income/affordability survey of ADUs in the region. Orange County is located within the Orange County study area for the SCAG income/affordability ADU survey. The analysis resulted in affordability assumptions for jurisdictions in Orange County as follows: 15% can be assigned to the extremely-low-income category, 10% to very low-income, 43% to low-income, 30% to moderate-income, and 2% to above-moderate-income. Therefore, based on the ADU rent survey conducted by SCAG, of the 513 ADUs that can be credited toward the RHNA, the income distribution can be estimated at 128 extremely-/very low-income, 221 low-income, 154 moderate-income, and 10 above-moderate-income units.

The County has updated the Zoning Code to comply with State law regarding accessory dwelling units, or ADUs. ADUs are housing units which may be developed in addition to an existing single- or multifamily residential use. These housing units can be free-standing or attached to a primary structure and are intended to provide additional housing on an existing residential lot. Often ADUs provide housing for family members or are rented to members of the community. OC Development Services is currently preparing pre-approved ADU plans to streamline and facilitate a more streamlined ADU permitting process (see Housing Action Plan, Program 7), which is anticipated to contribute to continued increase in ADUs applied for, permitted, and constructed within Unincorporated Orange County. Along with preparing pre-approved ADU plans, in March 2023, the Orange County Housing Finance Trust (OCHFT) was awarded a $4 million grant from CalOptima Health for the purpose of creating and operating an ADU Loan program. The program is designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences with a goal of expanding access to income opportunities for homeowners while also providing much needed affordable rental units exclusively for very low-income tenants, including and prioritizing Section 8 voucher holders. Both programs-approved ADU plans and the ADU loan program are anticipated to bolster ADU production throughout the County and encourage the development of additional affordable units.

OC Development Services will continue to track ADU development by affordability level and report on Annual General Plan Progress Report (APR). Through the County's permitting system, the County currently tracks ADU applications and permits daily. The County reports this progress regularly through a variety of required reporting. Since 2010, the County reports the

total number of issued housing units, which include the specific number of ADU/JADUs, to the US Census Bureau monthly. Secondly, the total number of completed residential housing units, including the total number of ADUs/JADUs completed, are reported in a mid-year and annual report through the Housing Unit Inventory System to the Center for Demographic Research (CDR) since 2015. Finally, since 2011, the County reports ADU progress in the APR and Housing Element Implementation Report, and the Department of Finance Housing Unit Survey.

The County has also included an action under Program 6 in the Housing Action Plan to continue current tracking and reporting of ADU permit activity and should changes need to be made due to a gap in the number of ADUs projected and the number permitted, the County will make changes proportional to the gap identified within 6 months of the annual review. This may include, but is not limited to, rezoning or community outreach.

Summary of Progress Toward RHNA

After accounting for projects developed or under development and projected ADU development, the remaining RHNA allocated to the County for this 6th Cycle is 7,953 units. The County must identify available vacant and non-vacant sites that can accommodate at least 7,953 units (by income level). HCD also recommends that jurisdictions identify residential capacity within their boundaries that is above and beyond the required housing numbers identified in lower-income categories, to help offset sites that may (or may not) be developed during the planning period. The County must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029. To accomplish this, the Sites Inventory was developed and is described in further detail in the following section.

Table B-3
Remaining RHNA Need After Credits and ADU Units

	Extremely/ Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
Units approved, entitled, or constructed (Begins June 30, 2021- December 31, 2023)	111	21	10	1,798	1,940
Constructed/Projected ADU Development	128	221	154	10	513
Total	***239***	***242***	***164***	***1,808***	***2,453***
RHNA (2021-2029)	*3,139*	*1,866*	*2,040*	*3,361*	*10,406*
RHNA Status: +Surplus/(Shortfall)	***(2,900)***	***(1,624)***	***(1,876)***	***(1,553)***	***(7,953)***

Availability of Sites for Housing Production

This section contains an analysis of existing and available land with the potential for housing development in the 2021-2029 planning period compared to the Unincorporated County's remaining housing need.

Sites Not Requiring Rezoning

The inventory of sites that have appropriate zoning in place include one master planned community, one County-owned property, and religious institutions sites (outside of the Housing Opportunity Overlay) that could accommodate residential development. The sites have the appropriate land use and zoning designations in place and did not require any rezoning actions. A summary of currently available sites is presented in **Table B-4**, and a detailed listing consistent with state law is included in **Table B-8**.

Additional land resources are available for future residential development on underutilized sites that required zoning amendments; those sites will be discussed later in this section as sites that required rezoning actions to become adequate sites.

Table B-4
Summary of Sites Not Requiring Rezoning

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
Rancho Mission Viejo	165	1,000	1,894	3,059
Coyote Canyon	62	124	432	618
Non-HOO Religious Institution Sites	330	-	-	330
Total	***557***	***1,124***	***2,326***	***4,007***
Remaining RHNA (after Credits/ADUs)	***4,524***	***1,876***	***1,553***	***7,953***
RHNA Shortfall Status: +Surplus/(Shortfall)	***(3,967)***	***(752)***	***+773***	

Rancho Mission Viejo

During the past 50 years most development in Unincorporated Orange County has occurred in major landholdings under the planned community concept. Most of these areas were incorporated into new cities between 1988 and 2001, including Mission Viejo (1988), Dana Point (1989), Laguna Niguel (1989), Lake Forest (1991), Laguna Hills (1991), Laguna Woods (1999), Rancho Santa Margarita (2000), and Aliso Viejo (2001). Most of these areas were originally approved as planned communities in Unincorporated Orange County.

Only one planned community in the Unincorporated County areas, Rancho Mission Viejo – has a significant amount of land remaining to be developed during this Housing Element timeframe. Located in southeastern portion of the County east of Rancho Santa Margarita, Mission Viejo and San Juan Capistrano, Rancho Mission Viejo was approved in 2004 with a maximum of 14,000 residential units. It is expected to be the final large landholding that will be developed in Unincorporated Orange County since all other significant undeveloped parcels are located within cities, regional parks, or the Cleveland National Forest.

In November 2004 the Board of Supervisors adopted a General Plan Amendment, Development Agreement, Rancho Mission Viejo Planned Community Program with associated Statistical Table and Planned Community Development Map, and a Zoning Ordinance with associated Statistical Summary and Zoning Map for Rancho Mission Viejo. This action approved entitlements for the project and established Planned Community zoning on the property allowing the developer to move ahead with the construction of dwelling units, commercial, recreational, and other non-residential uses. Since 2004, Rancho Mission Viejo has been working with the County to prepare detailed development and infrastructure plans.

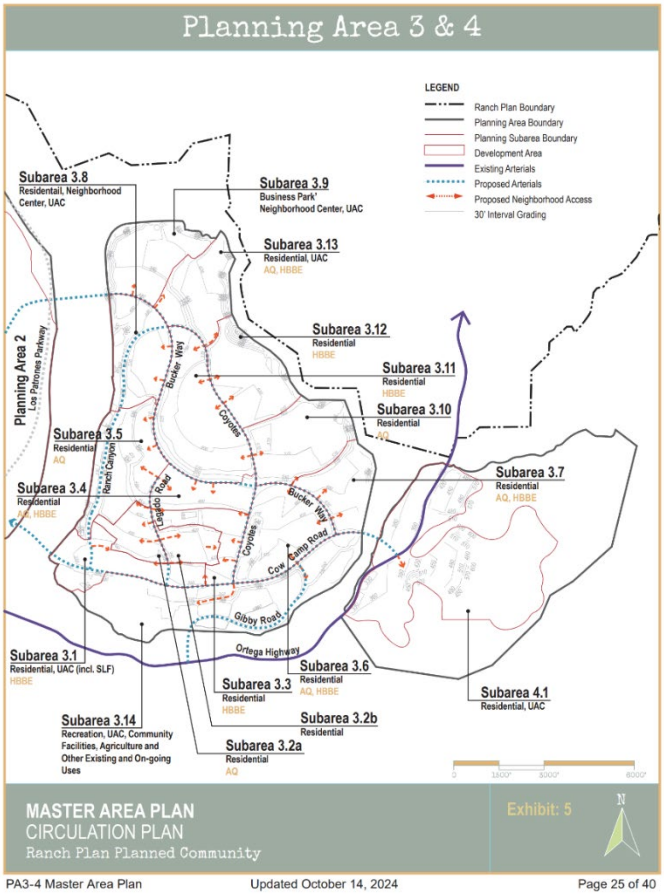
Master Plan Development in Orange County

Most residential development in Unincorporated Orange County that has occurred over the past 50 years has been in large-scale master planned communities. Unlike traditional zoning, Planned Community (PC) zoning provides certainty in the development process while allowing the property owner to maintain some degree of flexibility in the specific location of development. This type of zoning is more appropriate than traditional zoning because of the magnitude of the projects under a single ownership. Many planned communities in Orange County have encompassed thousands of acres developed over a period of several years. The County has a strong track record of negotiating the inclusion of affordable housing and completing these housing projects on large parcels or sites such as in the planned communities of Mission Viejo, Aliso Viejo, and Rancho Santa Margarita (20,618 total acreage), which later incorporated as cities, and Foothill Ranch, Talega, and Tonner Hills (5,230 total acreage), which were later annexed into the cities of Lake Forest, San Clemente, and Brea respectively

Planned Community zoning is more desirable than conventional zoning for large projects because it allows comprehensive, long-range planning for infrastructure while also providing the

development certainty needed for property owners to obtain the financing needed to pay for development and public improvements. It also eliminates the need for frequent zone changes that would be necessary under conventional zoning to make adjustments due to market conditions or other circumstances. Instead of a zone change that would require public hearings at the Planning Commission and Board of Supervisors, adjustments to unit counts and locations are typically processed either ministerially by staff, or with only Planning Commission approval. This flexibility simplifies the development review process and reduces total development cost.

Planning Area 3



PA3-4 Master Area Plan Updated October 14, 2024 Page 25 of 40

Rancho Mission Viejo is divided into a total of nine Master Plan Areas that are then divided into Subareas. The Master Area Plan focuses on a Planning Area in their entirety and addresses more regional topics/issues. The Subarea Plans focuses on segments of the Planning Area(s) and community level topics/issues.

The residential development capacity included in this Housing Element is limited to six sub areas within Planning Area 3 (PA3) as these areas are expected to be developed within the 2021-2029 6th Cycle Housing Element Planning Period and the capacity in those areas was included in the County's forecast of new construction and are reflected in OCP 2018, the dataset used by SCAG to determine the County's RHNA allocation.

Development Capacity and Schedule

The development capacity for this area is based on the entitlements currently under development. Therefore, no adjustment factors (for land use controls or site improvements) are applied. This capacity is distributed across six PA3 sub-areas, expected to develop within the current planning period (as shown in Figure B-16), with a total of 3,059 units. As mentioned earlier, only these PA3 subareas are included in the inventory as these areas are expected to be developed within the Planning Period and were included in the 2021-2029 RHNA Allocation Plan. Development in the following subareas is underway and expected to be completed within the planning period.

Subarea	Units	Status	Estimated Dates
3.2b	514	Entitled	Construction permits: 2025

3.3	450	Entitled	Construction permits: summer 2025
3.4	320	Entitled	Construction permits: summer 2025
3.5	740	Entitled	Construction permits: early 2026
3.6	675	Entitled	Construction permits: summer 2026
3.7	360	Entitled	Construction permits: 2028
Total	3,059		

Site Suitability: Affordability

As part of the General Plan amendment, Planned Community (zone change) and development agreement for Rancho Mission Viejo, the property owner is required to comply with the Affordable Housing Implementation Agreement (AHIA), as amended (2016), which includes the Private Sector Alternative discussed under Strategies and Action section which dedicated an aggregate of 60 gross acres of land to the County for affordable housing development. Per the Development Agreement, and subsequent Affordable Housing Implementation Agreement (AHIA), 165 very low- and low-income units will be produced in Planning Area 3. AB 1397 requires additional justification to include parcels larger than 10 acres in the sites inventory for lower-income housing. Because the development agreement requires inclusion of the 165 affordable units, site size is not a constraint. The PA3 sub-areas are already advancing through the development process and once the units are built, the appropriate parcelization will be in place.

A portion of housing proposed in Planning Area 3 will be multifamily housing. Site inventory estimates for Rancho Mission Viejo include 1,000 units affordable to moderate-income households based on expected development of these multifamily units. According to data provided by the developers, 28% of units (or 1,985 units) in Planning Area 3 will be multifamily. While the Plan estimates close to 2,000 multifamily units, only half (1,000) units are allocated to meet the moderate-income RHNA. While these units can be credited toward the lower-income RHNA, consistent with state law, they are instead credited, conservatively, to the moderate-income category. The Rancho Mission Viejo Planning Area 3 site is shown on **Figure B-14**.

Development Trends

Since the grand opening of Planning Area 1 in 2013, Rancho Mission Viejo and neighborhood builders have completed and sold/rented 1,247 housing units in Planning Area 1, of which 286 are deed-restricted senior housing (Age Qualified) units. In addition, 107 senior affordable apartments have been leased. Based on recent examples of developed multifamily projects in Rancho Mission Viejo, below, it is estimated that half of the units will be in development near or meet the default density of 30 du/ac.

- 1301 Lasso Way (2023): 12-unit multifamily building with a density of 30 du/ac.
- 38 Pasarela Drive (2020): 24-unit multifamily building with a density of 42 du/ac.

- Sendero Bluff Apartments, 30472 Gateway Place (2016): 107-unit multifamily building with a density of 39 du/ac.
- Esencia Norte Apartments 86 Esencia Drive (2016): 112-unit affordable, multifamily building with a density of 28 du/ac.
- Esencia Sur Apartments 92 Esencia Drive (2016): 150-unit multifamily building with a density of 27 du/ac.

Site Suitability: Size and Infrastructure Constraints

The parcels included in the site inventory for Rancho Mission Viejo are substantial in size, as they are currently in the subdivision process. The most current GIS mapping data shows that some parcels have been divided into smaller areas and as such the site inventory table (Table B-8) shows parcels with the same APN numbers. These are not duplicates, they are large parcels that have been divided into smaller areas. The PA3 sub-areas are already advancing through the development process, they are currently going through the final map process while concurrently submitting for construction permits, ensuring greater certainty regardless of parcel size. Once the units are built, the appropriate parcelization will be in place.

The Ranch Mission Viejo Planning Areas 3 and 4 Master Area Plan and Subarea Area Plans address infrastructure elements to ensure that the area will have adequate and sustainable support for the proposed development. The Master Plan and subplans include a timeline or phases for the implementation of infrastructure to align with the development's growth stages, ensuring that infrastructure is available as each phase progresses. It also includes an outline for the maintenance responsibilities of the infrastructure to ensure long-term operational sustainability. The PA3 sub-areas are already advancing through the development process and infrastructure needs have been addressed as part of that process.

County Development Support and Facilitation Measures

The County is committed to the following specific actions to facilitate its development.

- The County has designated the Manager Land Development as the primary point of contact for the developer to expedite applications and resolve issues that may arise.
- The Director, OC Community Resources/Housing is the primary designated contact for facilitating development of the sites to be dedicated for affordable housing.
- Affordable housing projects shall be approved administratively.
- The County will report annually to State HCD and the Board of Supervisors regarding progress toward the development of Rancho Mission Viejo and its affordable housing sites through a required Annual Monitoring Report.

Coyote Canyon

Coyote Canyon is a 375-acre former landfill property that is owned by the County of Orange. The site is located at 20661 Newport Coast Drive, between Bonita Canyon and San Joaquin Hills Roads, in the City of Newport Beach and within the County of Orange Sphere of Influence. A portion of the property (203 acres) is not subject to restrictions put in place regarding the former landfill use. This is the only portion of the property identified within the County's Housing Element Land Inventory. The full capacity of this site is included in the City of Newport Beach's 6th Cycle Housing Element. However, the County owns the land and has ultimate permitting authority for the site. In other words, if the site is to be redeveloped, including for residential purposes, it will be the County that authorizes such redevelopment. The site is not subject to regulation by the City of Newport Beach General Plan or zoning ordinance. There is no specific land use assigned to the property in the County's General Plan and zoning as the County does not assign zoning designations for properties outside of the Unincorporated County areas. The City of Newport Beach has included the site property in its General Plan and zoning map, however County-owned properties in other jurisdictions are not subject to the local zoning (intergovernmental immunity). In California, the doctrine of intergovernmental immunity means that County public works projects and permit decisions are not required to follow local general plans. This includes zoning, subdivision approvals, use permits, and public works.

According to research conducted by the City of Newport Beach, a developer has expressed written and verbal interest in developing a portion of the site at 60 du/acre. However, the County is estimating much lower densities (6.08 du/ac) based on previous experience with similar sites. The assumed full buildout at this lower density is projected at 1,234 units. Nevertheless, as with past projects within incorporated jurisdictions, the County is open to sharing equal credit for the developed units. While these densities are not considered appropriate to accommodate housing for lower-income households, the County is committed to including 30% of its total unit share as affordable units (618 total units including 186 units set aside for deed-restricted, affordable housing for lower-income [10%] and moderate-income households [20%]). Program 3 includes the County's commitment to include a portion of affordable units (186 units) on this site.

The City of Newport Beach has also identified the portion of the site that is suitable and feasible for structural and residential development. As with all development around former landfill sites, there are extensive processes and mitigation measures that must be taken to ensure safety. While siting buildings atop a landfill includes structural and environmental constraints, the interested developer believes both the structural and environmental constraints can be overcome with proven previously used techniques. The site would include methane mitigation systems ensuring the health and safety of future residents. An extensive analysis of site feasibility and site level due diligence has occurred on the site in consideration of the current environmental constraints. The analysis has concluded that the development potential (which is significantly higher than the development potential estimated in this site inventory) represents the most feasible opportunity for residential development. The identified site acreage suitable for residential development

identified in the County's site inventory, therefore, is a conservative representation of site development potential. The County's estimated development timeline for the site outlines entitlement approvals in 2025, construction commencement in 2026, and anticipated project completion by 2028.

- Entitlements: 2025
- Permitting: 2025-2026
- Construction: 2026-2028

The Coyote Canyon site is shown in **Figure B-11.**

Religious Institutions (No Rezoning)

The County has identified eight religious institutions in the Unincorporated County with potential for residential development. The site inventory is divided into two sections, as is the list of religious institution sites. This section includes five religious institution sites that already have the appropriate land use and zoning designations and did not require rezoning. The following section covers sites that required rezoning, including three religious institution sites within the Housing Opportunity Overlay (HOO). Although these HOO sites can be developed without rezoning, they are included in the rezoning section because the overlay offers significantly higher development potential.

Religious institutions sites are sites with churches or other religious institutions, with excess vacant property or large parking lots, that could accommodate residential development. SB 4, effective 2024, stipulates that faith-based organizations or nonprofit colleges must maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel. Throughout California, the development of affordable housing on religious properties has become an increasing trend. Nonprofit organizations such as Many Mansions and National CORE have assisted many religious facilities in incorporating housing on religious facility sites.

There has been significant expressed interest from church operations throughout Southern California to partner with nonprofit developers to provide affordable housing onsite. Typical development models involve churches providing a ground lease of the surplus or parking areas for affordable housing in exchange for lease payments, new facilities, and/or affordable units for staff. A program action (Program 4) is included in the Housing Plan for the City to support such opportunities.

For all six sites, no church buildings or driveway access areas are assumed to have development potential. These six sites were chosen because of the presence of unused undeveloped areas on their property, or because they had smaller portions of expansive parking or lawn areas that could be developed. Religious institutions with constraints, such as small size or limited parking/open areas, were either excluded or not selected from the analysis. In 2024, the religious institutions listed in Table B-5 were contacted to gauge their openness to housing development on their properties. They were informed that State law allows religious institutions to add housing without impacting current operations, removing existing buildings, or requiring rezoning, and that expressing interest would not commit them to any future development. They did not oppose inclusion in the inventory.

Combined, these six sites can yield 330 units on 12 acres of developable land. These churches can partner with nonprofit developers to provide affordable housing on the sites and receive parking relief to facilitate development. Because only affordable housing would qualify for the parking relief, the units are credited against the lower-income RHNA. If a density bonus was used, the number of units on the sites would increase significantly.

Table B-5
Summary of Religious Institutions Sites (No Rezoning Needed)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
Calvary Chapel of the Canyons	Canyons	4.5	1.5	33%	30 du/ac	45	The church property has an undeveloped/unused area in the rear that is included in the inventory. The church building and parking area are not included in the inventory.
Trinity United Presbyterian	North Tustin	9.0	1.0	11%	30 du/ac	30	The church property includes a large parking area that spans most of the outer perimeter of the site. Only a small portion of the parking area on the northwest side of the property is included in the inventory. The remaining parking area can accommodate the current use.
New Life Church	North Tustin	4.32	0.5	12%	30 du/ac	15	The church property includes a half-acre undeveloped/unused area on the side of the property that can accommodate development. Most of the site which includes a church building, parking lot, and a resources center for blind children is not included in the inventory.

Table B-5
Summary of Religious Institutions Sites (No Rezoning Needed)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
St Michael's Abbey	Canyons	122	6.0	5%	30 du/ac	180	St. Michael's Abbey is a large seminary, monastery, and church. The property includes three large parcels spanning 122 acres. Only one parcel is included as it is a stand-alone parcel that is undeveloped. It is located across the street from the developed portion of the site. To account for potential site improvements, only 75% of a stand-alone, undeveloped parcel is included in the inventory.
The Church of Jesus Christ of Latter-day Saints	Ladera Ranch	6.4	2.0	31%	30 du/ac	60	The church property includes a large lawn with only a medium size picnic table shelter at the end closest to the church buildings. The lawn is large, just under four acres and only half of that area is included in the inventory. The church building, half the lawn with picnic area, and parking area are not included in the inventory.

RHNA Shortfall

The County can meet more than half (55%) of the RHNA with approved and proposed projects, projected ADU development, and development of Rancho Mission Viejo, one County-owned site, and several religious institution sites. After accounting for this capacity, a shortfall of 4,719 units remains (**Table B-4**).

To address the shortfall, the County has identified various sites that, while appropriate for redevelopment and intensification, required zoning amendments that would increase residential development potential and serve as a significant incentive for redevelopment. Once appropriate zoning actions are taken, the County can accommodate the remaining RHNA.

RHNA Shortfall Site Requirements

Rezoning and used to address an unaccommodated, lower-income RHNA are subject to additional requirements under State law. Housing Element law (Government Code 65583.2[h]) requires that the County accommodate all the lower-income, unaccommodated RHNA on sites that are:

- Zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower-income households during the planning period; and
- Permit at least 16 units per site at a density of at least 20 units per acre

- At least half of the very low- and low-income housing need must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all the very low- and low-income housing need on sites designated for mixed-uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

Sites to accommodate the moderate- and above-moderate-income RHNA shortfall are *not* subject to these requirements. Sites that meet the density requirement but do not have a minimum capacity for 16 units are credited toward the moderate- and above-moderate-income RHNA shortfall.

Table B-6 summarizes the sites to be rezoned and shows that once appropriate zoning actions are taken, the County can adequately accommodate the remaining RHNA. All sites credited to the lower-income RHNA meet the shortfall requirements consistent with Government Code 65583.2[h]. A complete summary of sites to be rezoned is presented on **Table B-6** and **Figures B2** to **B-14**. A detailed listing of sites is included in **Table B-8** as required by State law.

Sites Requiring Rezoning

The incorporation and build-out of south Orange County have shifted the focus of residential development that is under the jurisdiction of the County to the older Unincorporated islands in the northern portion of the county. The "first wave" of development in these areas occurred during the 1950s and '60s as suburban growth spread south from Los Angeles. Fifty years later a few scattered vacant parcels remain, but there is also significant potential for redevelopment of underutilized properties with higher-density housing. The County of Orange's land inventory is different from most jurisdictions as it is continually shrinking due to annexations from incorporated cities within the County. While this is a common practice, it serves to deplete the available land the County can identify within the Housing Element. The most recent annexation occurred in September 2022. Approximately 265 acres of undeveloped, Unincorporated land (Tonner Hills Annexation Extension CA 03-12A) was annexed to the City Brea and the certificate of completion was issued in September 2022. This site would have been included in the County's 6th Cycle Land Inventory. It is anticipated this land will be developed into a planned community or specific plan with more than 1,100 units including at least 10% affordable to low- and moderate-income households.

Housing Opportunities Overlay Zone

The 2000 Housing Element included a Housing Action Plan item to designate such areas for higher-density development, and in 2006 the Housing Opportunities Overlay Zone (HOO) was adopted. The Housing Opportunities Overlay Zone (section 7-9-44.6) provides the option of affordable multifamily development on commercial and industrial sites, and in 2008 the Housing

Opportunities Overlay Zone was expanded to include properties that are conventionally zoned for multifamily development along arterial highways. The HOO requires that 100% of the units be reserved for lower-income households.

In 2020, the density of the HOO was increased from a maximum of 25 to 43.5 units per acre (not including density bonus units). In 2022, the maximum density of the HOO was again increased from 43.5 to 70 units per acre. Currently, the base density in all portions of the Housing Opportunities Overlay Zone is 70 units/acre. Program 1, most of which was completed 2024, amended the HOO to permit residential development at 70 dwelling units per acre for all zoning districts where it is permitted. To expand the opportunities for development of higher density, affordable housing, in 2024, the HOO was expanded to sites zoned multi-family residential, light industrial, and mixed-use and a 30 du/ac minimum density was implemented for all base zones within the HOO. Additionally, most of the base commercial zoning within the HOO was changed to Mixed-Use which does not allow for stand-alone non-residential uses and requires residential uses to comprise at least 50% of the total floor area. The County's commitment to facilitating and encouraging affordable housing development can be seen in these planning efforts.

As the County has an identified shortfall and the rezoning was done after the start of the 2021-2029 Housing Element Planning period, the following actions are considered a rezoning action even if they have already been completed:

- Increase the maximum density in the HOO to 70 du/ac
- Establish a minimum density in the Multifamily Dwellings (R2), Apartment (R3), Suburban Multifamily Residential (R4), Residential Profession (RP), or Mixed-Use (MX) zones of 30 dwelling units per acre
- Rezone properties with a zone designation of Local Business (C1), General Business (C2), Commercial Community (CC), Commercial Highway (CH), Commercial Neighborhood (CN), or Residential Profession (RP) to the new Mixed-Use (MX) zoning district
- Adding properties within the Multifamily Dwellings (R2), Apartment (R3), and Suburban Multifamily Residential (R4), Light Industrial (M1) and new Mixed-Use zoning districts to the Housing Opportunities Overlay (HOO), which provides opportunities and incentives for future affordable housing projects.

The 70 du/ac density for the HOO was determined based on discussions with the development community and others with local experience developing affordable housing within the County of Orange. This density allows increased flexibility in the type of development that may occur within these areas and presents additional opportunities for residential development. In July 2024, the County of Orange amended the associated development standards within the HOO to reflect development at 70 dwelling units per acre. Due to the nature of the HOO as described in

this section, all candidate housing sites within the HOO can be developed as 100% affordable to lower-income households.

As reflected in **Table B-14**, the HOO has been very successful in stimulating affordable housing development, with 8 new residential projects approved since 2007 and one project currently under development. As shown on **Table B-14**, with every density increase, the densities of developed affordable housing increased proportionally. Since 2007, housing projects in the HOO have averaged over 100% of allowable density and have resulted in 371 new affordable housing units.

The three projects that have been developed or approved since the start of the 5th RHNA cycle (2014) have achieved development densities over 125% of maximum allowable density. In 2022, Casa Paloma, a 71 units affordable projects achieved a density of 254% of maximum allowable density at the time of its approval (25 du/ac).

- Potter's Lane is a 16-unit affordable project in Midway City that was developed on a site previously in use as a single-family home. The project was developed on a site under half an acre in size and achieved a density of 39 du/ac on a site that had a maximum allowed density of 25 du/ac.
- Casa Paloma, a 71-unit multifamily affordable housing apartment community in accordance with the Housing Opportunities Overlay Zone Regulations. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The Casa Paloma project qualifies for the unlimited density bonus provision. The project's proximity to a major transit stop also permits use of modified parking standards. Government Code Section 65915 states that parking is not required for special needs housing and that the parking ratio shall not exceed 0.5 spaces per unit for the other affordable housing units. With these provisions, the project requires a total of 22 parking spaces, where a total of 28 parking spaces are provided. The project, approved in 2020, received its certificate of occupancy on September 29, 2022, and is currently in the pre-leasing process.
- Jackson Street, a 65-unit multifamily affordable housing apartment community in the Housing Opportunities Overlay Zone was developed at a density of 87.25 du/ac when the maximum allowed on the site was 70 du/ac. This is a density of 125% of the maximum allowed. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project qualified for the unlimited density bonus provision. The

project's proximity to a major transit stop also permits use of modified parking standards. The planning application for Jackson Street was approved in 2024.

Due to the small parcelization in older parts of the County such as in the Unincorporated islands, larger projects many times require lot consolidation. To incentivize affordable residential development, a graduated density increase is available for projects that consolidate multiple properties based on project size after lot consolidation.

- Less than 0.50 acre: 70 units per acre
- 0.50 to 0.99 acre: 77 units per acre (10% increase)
- acre or more: 84 units per acre (20% increase)

These densities apply to sites identified in the HOO regardless of base zoning density. As the County has increased the base density for R-2, R-3. R-4, and MX zones, all sites identified in the HOO require a 30 du/ac minimum density.

The HOO allows for residential development as a by-right use. All sites included in the site inventory allow affordable residential by-right and in the Mixed-Use District, stand-alone non-residential is not allowed. To facilitate the development of housing in the HOO, the Housing Opportunities Manual was created and provides guidelines for proposed projects and a description of the application submittal and review process. Along with development of the Housing Element and zoning amendments, the Housing Opportunities Manual has been updated to include minimum criteria, objective development standards, and clear procedural guidelines for all affordable housing projects.

Affordability is dependent on density allowed, capacity, and size. Sites allowing the State-designated default density standard (at least 30 du/ac) and meeting the shortfall requirement of accommodating at least 16 units are credited toward the lower-income RHNA. Sites meeting the default density standard (at least 30 du/ac) but under 0.5 acres in size are credited toward the moderate-income category as are sites that meet the density standard and are larger than 0.5 acres but cannot accommodate 16 units as required by the shortfall requirements. Realistic capacity methodology and affordability assumption are discussed after this section.

Table B-6
Summary of Rezoned Sites

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
HOO-Residential R-2	-	80	-	80
HOO-Residential R-3	103	39	-	142
HOO-Residential R-4	217	-	-	217
HOO-Mixed-Use	3,408	752	-	4,160
HOO-Other (M-1)	254	-	-	254

Table B-6
Summary of Rezoned Sites

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
HOO Religious Institution Sites	284	-	-	284
Total	**4,266**	**871**	**-**	**5,137**
RHNA Shortfall	*3,967*	*752*	*-*	*4,719*
RHNA Status: +Surplus/(Shortfall)	**+299**	***+119***	**+773**	***+1,257***

HOO - Underutilized Infill Parcels

The County has identified 150 parcels that can be grouped into 59 sites for redevelopment to add new housing or to redevelop with a significantly higher number of units. Only two parcels are vacant and as such this discussion focuses on underutilized sites. Combined, sites in the HOO can accommodate 5,137 units (4,266 lower-income units and 871 moderate-income units. Maximum allowable density (ranging from 77 to 84 du/ac) is assumed, and that approach is described in detail in the methodology section.

HOO with Residential Zoning:

- Three **HOO-R2** sites (five parcels) are included in the inventory and only one is comprised of multiple parcels (the three parcels are under common ownership). Although the three sites can accommodate at least 16 units, none are credited toward the lower-income RHNA as they are considered small sites (under 0.5 acres in size).
- Four **HOO-R3** sites (nine parcels) are included in the inventory and two of the sites are comprised of multiple parcels. The two multi-parcel sites are included as they are developed with single family units in an area where multifamily development is predominant. These sites are larger than typical single-family properties of a size that can accommodate a multifamily development. The allowable HOO density allows for 13 to 25 times the number of current units developed. The two stand-alone sites are located along Bolsa Avenue and developed with older, less intense commercial uses with lower lot coverage and signs of deferred maintenance.
- Five **HOO-R4** sites (14 parcels) are included in the inventory and four of the sites are comprised of multiple parcels. These four multi-parcel sites are either fully or partially under common ownership (for example 5 parcels with two owners). The multi-parcel sites are included as they are developed with single family on relatively large lots (low lot coverage). One site has one unit over three parcels and limited lot improvement. Another site has 2 units over four parcels with large

undeveloped areas. On the single-parcel site, the allowable HOO density allows for ten times the number of current units (4 units).

HOO with Mixed-Use Zoning:

- There are 42 **HOO-MX** sites (116 parcels) included in the inventory. Sixteen sites are single-parcel sites and 26 are multi-parcel sites. Thirteen of the multi-parcel sites are either fully or partially under common ownership (for example 5 parcels with two owners). To leverage the potential for development presented by the area's underutilization, the properties have been rezoned to the Mixed-Use district as part of the 2024 zoning amendment. Stand-alone residential uses are allowed in the mixed-use zone, but stand-alone non-residential development is not allowed, and all projects on the shortfall sites are required to include 50% residential uses. This approach addresses the issue of the potential for non-residential development and shows that the capacity identified is realistic and achievable.

  The largest grouping of HOO-MX sites is in the Midway City islands (generally near the corner of Bolsa Avenue and Beach Boulevard). In the area southeast of Bolsa and Beach, there are many underutilized properties in use as auto repair and smaller, independent auto sales businesses with large surface lot area for car storage. Along Bolsa Avenue, properties in use as commercial uses were identified as the uses were older, smaller scale with signs of deferred maintenance or lack of visual signs of improvements. This area is adjacent to residential uses on the north and east side and has seen increased interest in redevelopment. Three affordable, higher density, housing developments have been built or are under development (the 16-unit Potter's Lane project, the 71-unit Casa Paloma, and the 63-unit Jackson Street project). Due to the size of many of the sites, higher densities can be achievable for projects over a half-acre in size. Several sites north of the Bolsa Avenue frontage properties are selected due to their underutilization. The sites have single-family units but are in areas that are predominately multifamily. The sites are located along or near two major regional roads (Bolsa Avenue and Beach Boulevard) and just one mile from I-405, which connects Orange County to major employment areas in Orange and Los Angeles counties. All sites in this area fall within a High-Quality Transit Area (HQTA) which provides additional incentives (parking relief) for development of high-density housing.

  A second large grouping is in the Anaheim/Stanton Islands (generally north of Katella Avenue and west of Brookhurst Street). In this area, the sites are currently in use as small-scale commercial uses, many in uses as older, smaller-scale, strip commercial centers with large undeveloped areas for storage or parking, single family homes (in multifamily neighborhoods where development regulations allow a 10-to-20-fold increase in units). Most sites are located along or at the intersection

of major roads which are ideal for high density development as it offers easier access to the site. Most of the sites in this area fall within a HQTA which provides additional incentives for development of high-density housing.

There are three HOO-MX sites, that are also stand-alone parcel sites with no lot consolidation assumed, that are over 4 acres in size and can be credited toward the lower-income RHNA. However, to account for the potential of mixed-income housing on these relatively larger sites, affordability for these three sites has been split between lower-income and moderate-income RHNA. This approach is described in detail in the methodology section.

HOO with Other Zoning:

- Two **HOO-M1** sites (3 parcels) are included in the inventory. The sites are large, and the current uses are commercial industrial businesses. The larger site (1.6 acres) has two small structures, and the rest is an unimproved lot area used to store old cars and truck containers. The sites are located at the edge of a residential area and next to a multifamily neighborhood. These two sites have the potential to accommodate 254 units (and potentially more if a density bonus is used). These two sites are the only non-residential, non-mixed-use sites but they are included as the size of the properties, location in a residential area, and easy regional access make them ideal for future housing development. For sites located within a commercial or industrial zoning district such as M-1, the site development standards for the R3 "Apartment" District apply except that the base density shall be 70 dwelling units per acre (net development area).

HOO Religious Institutions

The County has identified eight religious institutions in the Unincorporated County with potential for residential development. The site inventory is divided into two sections, as is the list of religious institution sites. The previous section included five religious institution sites that already have the appropriate land use and zoning designations and did not require rezoning. This section covers sites that required rezoning, including three religious institution sites within the Housing Opportunity Overlay (HOO). Although these HOO sites can be developed without rezoning, they are included in this rezoning section because the overlay offers significantly higher development potential.

For all sites, no church buildings or driveways access areas are assumed to have development potential. These three sites were chosen because that had unused/undeveloped areas on their property, or because they had smaller portions of expansive parking or lawn areas that could be developed. Religious institutions with constraints, such as small size or limited parking/open areas, were either excluded or not selected from the analysis. In 2024, the religious institutions

listed in Table B-7 were contacted to gauge their openness to housing development on their properties. They were informed that State law allows religious institutions to add housing without impacting current operations, removing existing buildings, or requiring rezoning, and that expressing interest would not commit them to any future development. They did not oppose inclusion in the inventory.

Combined, these three sites can yield 283 units on 3.4 acres of developable land. Maximum allowable density (ranging from 77 to 84 du/ac) is assumed, and that approach is described in detail in the methodology section. These churches can partner with nonprofit developers to provide affordable housing on the sites and receive parking relief to facilitate development. Because only affordable housing would qualify for the parking relief, the units are credited against the lower-income RHNA. If a density bonus was used, the number of units on the sites would increase significantly.

As stated earlier, there has been significant expressed interest from church operations throughout Southern California to partner with nonprofit developers to provide affordable housing onsite. Typical development model involves the church to provide a ground lease of the surplus or parking areas for affordable housing in exchange for lease payments, new facility, and/or affordable units for staff. An action (Program 4) is included in the Housing Plan for the County to support such opportunities.

Table B-7
Summary of Religious Institutions Sites (HOO Rezoning)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
Bethlehem Evangelical	Rossmoor	2.1	1	47%	77-84 du/ac (2 parcels)	89	The property includes a church building with parking lots on both sides and a small lawn. Only half the site is included, which leaves room for the parking lot on one half of the property. The church buildings, small lawn and a portion of the parking area is not included in the inventory.
La Purisima Church	El Modena	7.8	1.8	23%	84 du/ac	153	This is a large (7 parcel) property with a church, school and other buildings. The property also includes a large parking lot and a lawn. Only the northernmost, stand-alone, 1.8-acre parcel is included in the inventory, and it is currently used as a lawn and a small portion of parking. lot. Due to the size of the property, there are ample parking lots which would provide flexibility for placement of a residential component. The church and school buildings and most of the parking area is not included in the inventory.

Table B-7
Summary of Religious Institutions Sites (HOO Rezoning)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
Saint Justin Martyr Church - Sacred Mission	Anaheim Stanton	1.1	0.5	48%	77 du/ac	41	The church property is made up of two non-adjacent parcels. Only one parcel is included in the inventory as it is used only for parking. The church is small, and its primary use is a food pantry. The church and food pantry buildings are not included in the inventory.

RHNA Status

The complete sites inventory identified in this chapter (including credits, ADU projections, sites in place, and sites that required rezoning actions) totals 11,597 units, 5,304 units of which are in the very low- and low-income RHNA categories. Overall, the County can adequately accommodate—and have excess capacity—to accommodate the RHNA as all rezoning actions are completed (July 2024).

Compliance with State Law

Reuse of 5th Cycle Sites

Vacant sites identified in the previous two Housing Elements and non-vacant sites identified in the previous Housing Element are not subject to the reuse provisions of Government Code 65583.2(c). The code requires that these previously used, lower-income sites be zoned at residential densities consistent with the default density established by HCD (30 units per acre) and the site allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households. Because all lower-income sites that were previously used are identified in **Table B-8** have been rezoned as part of the County's 2024 zoning amendments to require a 30 du/ac minimum density and allow affordable housing by-right for projects with at least 20% as part of the RHNA shortfall requirements, they are exempt from this requirement. Non-vacant sites identified in the previous Housing Element but credited toward the moderate- or above-moderate-income RHNA in the current Housing Element are not subject to the reuse provisions.

Moderate and Above Moderate Income Site Requirement

For jurisdictions that are considered Metropolitan, State law requires that the element identify at least 25 percent of the remaining moderate- and above-moderate- RHNA on sites that allow at least four units of housing (e.g., four-plex or greater). (Gov. Code, § 65583.2, subd. (c)(4).) After accounting for projects completed or under development, and ADU estimates, the remaining

moderate need is 1,876 units, and the remaining above-moderate need is 1,553 units. There is capacity for 871 units in HOO residential and mixed-use zones to accommodate more than 25% (461 units) of the remaining moderate-income need. These sites require a minimum density of 30 du/ac and all sites can accommodate more than 4 units. The remaining above-moderate-income need is addressed through development of the Rancho Mission Viejo Master Plan and one County-owned site, Coyote Canyon that have a combined capacity of over 4,700 units. Both sites allow a variety of housing types.

No Net Loss

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify at the time of approval the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project.

Site Inventory Table and Maps

Table B-8 presents a detailed listing of each candidate housing site within the County of Orange's sites inventory and **Figures B-2** to **B-14** show the locations. The sites are identified by assessor parcel number (APN) as well as a unique identifier used to track sites (which may include more than one parcel) within the inventory. The site inventory methodology is discussed after this section.

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
1, 2, 6, 7, 8	BA	HOO - M1	Orange/Olive	360-382-18	1.61	OLIVE AND MAIN ST	Res 1B	M1	No Change	Commercial	30	84	135	0	0	135	NO	N
1, 2, 6, 8	BB	HOO - M1	Orange/Olive	360-384-04	0.70	2875 N ORANGE OLIVE RD	Res 1B	M1	No Change	Commercial	30	77	54	0	0	54	NO	N
	BB	HOO - M1	Orange/Olive	360-384-05	0.84	2911 N ORANGE OLIVE RD	Res 1B	M1	No Change	Commercial	30	77	65	0	0	65	NO	Y
1, 2, 6, 7	C	HOO - MX	Anaheim/Stanton	127-241-35	0.26	791 W STONYBROOK DR	Res 1B	C1	MX	Commercial	30	70	0	18	0	18	NO	N
1, 2, 6, 7, 8	D	HOO - MX	Anaheim/Stanton	127-242-18	0.26	801 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	70	0	18	0	18	NO	N
1, 2, 4, 6, 7, 8	E	HOO - MX	Anaheim/Stanton	126-503-27	0.45	8885 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	0	31	0	31	YES	Y
1, 2, 3, 6, 8	F	HOO - MX	Anaheim/Stanton	127-092-24	0.59	331 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	77	45	0	0	45	NO	Y
	F	HOO - MX	Anaheim/Stanton	127-092-25	0.56	9291 S BROOKHURST	Res 1B	C1	MX	Commercial	30	77	43	0	0	43	NO	Y
	F	HOO - MX	Anaheim/Stanton	127-092-32	1.06	305 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	84	89	0	0	89	NO	Y
1, 2, 6, 8	G	HOO - MX	Anaheim/Stanton	127-341-59	0.20	10012 GILBERT ST	Res 1B	C1	MX	Residential, 1 unit	30	70	14	0	0	14	NO	N
	G	HOO - MX	Anaheim/Stanton	127-341-60	0.38	10042 GILBERT ST	Res 1B	C1	MX	Residential, 1 unit	30	70	27	0	0	27	NO	N
	G	HOO - MX	Anaheim/Stanton	127-341-61	0.13	9512 BALL RD	Res 1B	C1	MX	Commercial	30	70	9	0	0	9	NO	N
1, 2, 4, 6, 8	H	HOO - MX	Anaheim/Stanton	127-621-08	0.47	9041 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	33	0	0	33	YES	N
	H	HOO - MX	Anaheim/Stanton	127-621-09	0.23	10962 MAGNOLIA AVE	Res 1B	C1	MX	Commercial	30	70	16	0	0	16	YES	N
	H	HOO - MX	Anaheim/Stanton	127-621-10	0.34	9001 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	24	0	0	24	YES	Y
2, 3, 6, 7	N	HOO - MX	El Modena	393-390-12	7.82	10000 CRAWFORD CANYON RD	Res 1B	CC	MX	Commercial	30	84	164	164	0	328	NO	N
1, 2, 3, 6, 7	O	HOO - MX	El Modena	393-390-13	2.23	10000 CRAWFORD CANYON RD	Res 1B	CC	MX	Commercial	30	84	187	0	0	187	NO	N
1, 2, 4, 6, 7, 8	P	HOO - MX	El Modena	093-114-01	0.38	11924 EARLHAM ST	Res 1B	C1	MX	Commercial	30	70	0	26	0	26	YES	N
1, 2, 4, 6, 7, 8	Q	HOO - MX	El Modena	093-113-10	0.17	11941 EARLHAM ST	Res 1B	C2	MX	Commercial	30	70	12	0	0	12	YES	N
	Q	HOO - MX	El Modena	093-113-15	0.17	18541 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	12	0	0	12	YES	N
	Q	HOO - MX	El Modena	093-113-21	0.63	18511 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	77	48	0	0	48	YES	N
	Q	HOO - MX	El Modena	093-113-23	0.13	18551 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	9	0	0	9	YES	N
	Q	HOO - MX	El Modena	093-113-25	0.13	18561 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	9	0	0	9	YES	N
	Q	HOO - MX	El Modena	093-113-27	0.26	18571 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	18	0	0	18	YES	N
1, 2, 4	AA	HOO - MX	Midway City	097-144-08	0.17	8421 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AA	HOO - MX	Midway City	097-144-09	0.20	8441 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	14	0	0	14	YES	Y
	AA	HOO - MX	Midway City	097-144-19	0.27	8451 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	19	0	0	19	YES	Y
1, 2, 4, 6, 7, 8	AB	HOO - MX	Midway City	097-132-15	0.21	8101 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	15	0	0	15	YES	Y
	AB	HOO - MX	Midway City	097-132-23	0.17	8061 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AB	HOO - MX	Midway City	097-132-24	0.16	8071 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AB	HOO - MX	Midway City	097-132-25	0.08	8081 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	6	0	0	6	YES	N
	AB	HOO - MX	Midway City	097-132-25	0.08	8081 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	6	0	0	6	YES	N
	AC	HOO - MX	Midway City	107-153-10	0.23	15022 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	0	16	0	16	YES	N

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
1, 2, 3, 4, 6, 7, 8	AC	HOO - MX	Midway City	107-153-11	0.11	8042 BOLSA	Comm 2A	C2	MX	Commercial	30	70	0	8	0	8	YES	N
	AC	HOO - MX	Midway City	107-153-12	0.11	15022 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	0	8	0	8	YES	N
1, 2, 3, 4, 6, 8	AD	HOO - MX	Midway City	107-180-03	0.59	15032 JACKSON ST	Res 1C	C2	MX	Commercial	30	77	45	0	0	45	YES	N
	AD	HOO - MX	Midway City	107-180-24	0.36	8122 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	25	0	0	25	YES	Y
	AD	HOO - MX	Midway City	107-180-28	0.24	8180 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	17	0	0	17	YES	Y
1, 2, 3, 4, 6, 7, 8	AE	HOO - MX	Midway City	107-152-12	0.42	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	30	0	0	30	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.39	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	27	0	0	27	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.15	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	11	0	0	11	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.17	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	12	0	0	12	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.17	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	12	0	0	12	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.18	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	N
1, 2, 4, 6, 7, 8	AF	HOO - MX	Midway City	107-151-42	0.23	15052 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	16	0	0	16	YES	N
	AF	HOO - MX	Midway City	107-151-54	0.31	15041 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
	AF	HOO - MX	Midway City	107-151-68	0.19	15062 ADAMS ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	N
	AF	HOO - MX	Midway City	107-151-68	0.18	15062 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	N
1, 2, 3, 4, 6, 7, 8	AG	HOO - MX	Midway City	097-142-22	0.30	8301 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	21	0	0	21	YES	Y
	AG	HOO - MX	Midway City	097-142-23	0.45	8331 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	31	0	0	31	YES	Y
1, 2, 4, 6, 8	AH	HOO - MX	Midway City	142-062-15	0.35	15451 BEACH BLVD	Res 1B	C1	MX	Commercial	30	70	25	0	0	25	YES	Y
	AH	HOO - MX	Midway City	142-062-17	2.26	15401 BEACH BLVD	Res 1B	C1	MX	Commercial	30	84	190	0	0	190	YES	N
	AH	HOO - MX	Midway City	142-062-18	0.55	15441 BEACH BLVD	Res 1B	C1	MX	Commercial	30	77	43	0	0	43	YES	N
1, 2, 4, 6, 7, 8	AI	HOO - MX	Midway City	107-151-02	0.31	15021 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
	AI	HOO - MX	Midway City	107-151-06	0.19	15032 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
	AI	HOO - MX	Midway City	107-151-55	0.17	15031 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AI	HOO - MX	Midway City	107-151-56	0.25	15012 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	18	0	0	18	YES	N
1, 2, 3, 4, 6, 8	AJ	HOO - MX	Midway City	107-180-25	0.62	15062 JACKSON ST	Res 1C	C2	MX	Commercial	30	77	48	0	0	48	YES	Y
	AJ	HOO - MX	Midway City	107-180-33	0.19	15081 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
	AJ	HOO - MX	Midway City	107-180-34	0.19	15082 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
1, 2, 3, 4, 6, 7, 8	AK	HOO - MX	Midway City	107-151-15	0.41	15161 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AK	HOO - MX	Midway City	107-151-37	0.19	15101 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
	AK	HOO - MX	Midway City	107-151-38	0.28	15111 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	20	0	0	20	YES	Y
	AK	HOO - MX	Midway City	107-151-45	0.40	15135 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	28	0	0	28	YES	Y
	AK	HOO - MX	Midway City	107-151-47	0.34	15132 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	24	0	0	24	YES	Y
	AK	HOO - MX	Midway City	107-151-48	0.28	15131 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	20	0	0	20	YES	Y
	AK	HOO - MX	Midway City	107-151-51	0.32	15114 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
	AK	HOO - MX	Midway City	107-151-52	0.16	15092 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	11	0	0	11	YES	Y
	AL	HOO - MX	Midway City	107-180-09	0.37	15132 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	26	0	0	26	YES	Y

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
1, 2, 3, 4, 6, 8	AL	HOO - MX	Midway City	107-180-10	0.37	15142 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	26	0	0	26	YES	Y
	AL	HOO - MX	Midway City	107-180-29	0.19	15112 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
	AL	HOO - MX	Midway City	107-180-30	0.19	15111 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
1, 2, 3, 4, 6, 7, 8	AM	HOO - MX	Midway City	107-151-20	0.41	15201 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AM	HOO - MX	Midway City	107-151-21	0.41	15211 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AM	HOO - MX	Midway City	107-151-67	0.14	15300 BEACH BLVD	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
	AM	HOO - MX	Midway City	107-151-67	0.14	15300 BEACH BLVD	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
	AM	HOO - MX	Midway City	107-151-67	0.55	15300 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	77	42	0	0	42	YES	N
1, 2, 3, 4, 6, 8	AN	HOO - MX	Midway City	107-151-30	0.41	15212 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AN	HOO - MX	Midway City	107-151-59	0.28	15232 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	19	0	0	19	YES	N
1, 2, 3, 4, 6, 8	AO	HOO - MX	Midway City	107-180-14	0.14	15231 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	AO	HOO - MX	Midway City	107-180-15	0.30	15222 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	21	0	0	21	YES	Y
	AO	HOO - MX	Midway City	107-180-16	0.15	8161 ELMORE WAY	Res 1C	C2	MX	Residential, 2 units	30	70	11	0	0	11	YES	Y
	AO	HOO - MX	Midway City	107-180-17	0.15	15232 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	11	0	0	11	YES	Y
1, 2, 4, 6, 7, 8	AP	HOO - MX	Midway City	107-151-31	0.41	15122 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AP	HOO - MX	Midway City	107-151-32	0.41	15142 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AP	HOO - MX	Midway City	107-151-33	0.41	15132 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
1, 2, 3, 4, 6, 8	AQ	HOO - MX	Midway City	107-151-19	0.41	15191 JACKSON ST	Comm 2A	C2	MX	Residential, 1 unit	30	70	29	0	0	29	YES	Y
	AQ	HOO - MX	Midway City	107-151-43	0.21	15180 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	14	0	0	14	YES	Y
	AQ	HOO - MX	Midway City	107-151-44	0.21	15181 JACKSON ST	Res 1C	C2	MX	Residential, 1 unit	30	70	14	0	0	14	YES	Y
1, 2, 3, 4, 6, 7, 8	AR	HOO - MX	Midway City	107-180-31	0.57	15201 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	77	44	0	0	44	YES	Y
	AR	HOO - MX	Midway City	107-180-32	0.17	15202 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
1, 2, 4, 6, 8	AS	HOO - MX	Midway City	097-134-09	0.17	8181 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AS	HOO - MX	Midway City	097-134-10	0.14	8191 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	AS	HOO - MX	Midway City	097-134-12	0.17	8225 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AS	HOO - MX	Midway City	097-134-25	0.25	8207 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	17	0	0	17	YES	Y
1, 2, 3, 6, 7, 8	V	HOO - MX	Midway City	097-103-31	0.85	14582 BEACH BLVD	Res 1C	C2	MX	Commercial	30	77	66	0	0	66	YES	Y
1, 2, 3, 4, 6, 7, 8	W	HOO - MX	Midway City	097-133-21	0.41	8121 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	0	29	0	29	YES	Y
1, 2, 3, 4, 6, 7, 8	X	HOO - MX	Midway City	144-251-08	0.44	16292 S HARBOR BLVD	Res 1C	C1	MX	Commercial	30	70	0	31	0	31	YES	Y
1, 2, 4, 6, 8	Y	HOO - MX	Midway City	097-141-09	0.15	8241 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Y	HOO - MX	Midway City	097-141-10	0.15	8249 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Y	HOO - MX	Midway City	097-141-11	0.15	8261 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Y	HOO - MX	Midway City	097-141-12	0.15	8271 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Y	HOO - MX	Midway City	097-141-13	0.15	8295 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Z	HOO - MX	Midway City	097-143-10	0.15	8371 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
1, 2, 3, 4, 6, 7, 8	Z	HOO - MX	Midway City	097-143-11	0.15	8381 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Z	HOO - MX	Midway City	097-143-12	0.15	8391 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Z	HOO - MX	Midway City	097-143-13	0.15	14951 HARPER ST	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
1, 3, 6, 7, 8	BC	HOO - MX	Orange/Olive	360-031-23	5.12	15777 E LINCOLN AVE	Res 1B	C2	MX	Commercial	30	84	215	215	0	430	NO	Y
1, 2, 7, 8	BD	HOO - MX	Orange/Olive	360-011-12	2.31	15631 E LINCOLN AVE	Res 1B	CH	MX	Commercial	30	84	194	0	0	194	NO	Y
1, 2, 6, 7, 8	BI	HOO - MX	Rossmoor	086-521-24	0.52	11171 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	77	40	0	0	40	NO	N
1, 2, 7	BJ	HOO - MX	Rossmoor	086-521-23	1.13	11131 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	84	95	0	0	95	NO	N
1, 2, 7, 8	BK	HOO - MX	Rossmoor	086-521-46	1.35	11031 LOS ALAMITOS BLVD	Res 1B	C1	MX	Commercial	30	84	113	0	0	113	NO	N
1, 2, 3, 6, 7, 8	BL	HOO - MX	Rossmoor	086-521-48	4.47	11081 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	84	188	188	0	376	NO	N
1, 3, 6, 7	BN	HOO - MX	Yorba Linda Fairmont	349-693-39	0.51	CA-90 and ESPERANZA	Res 1B	CH	MX	Vacant	30	77	40	0	0	40	NO	N
1, 2, 6, 8	BO	HOO - MX	Yorba Linda Fairmont	349-071-21	0.25	19651 ESPERANZA RD	Res 1B	C1	MX	Residential, 1 unit	30	70	18	0	0	18	NO	Y
	BO	HOO - MX	Yorba Linda Fairmont	349-071-24	0.24	19721 ESPERANZA RD	Res 1B	C1	MX	Commercial	30	70	17	0	0	17	NO	Y
	BO	HOO - MX	Yorba Linda Fairmont	349-071-25	0.30	19741 ESPERANZA RD	Res 1B	C1	MX	Residential, 1 unit	30	70	21	0	0	21	NO	Y
	BO	HOO - MX	Yorba Linda Fairmont	349-071-26	0.49	19701 ESPERANZA RD	Res 1B	C1	MX	Commercial	30	70	34	0	0	34	NO	Y
1, 3, 4, 7	I	HOO - R2	Anaheim/Stanton	127-562-01	0.26	10741 GARZA AVE	Res 1B	R2D	R2	Vacant	30	70	0	18	0	18	YES	N
1, 2, 3, 4, 6, 7, 8	J	HOO - R2	Anaheim/Stanton	127-573-21	0.26	10961 GILBERT ST	Res 1B	R2D	R2	Residential, 1 unit	30	70	0	18	0	18	YES	N
	J	HOO - R2	Anaheim/Stanton	127-573-22	0.12	9441 KATELLA AVE	Res 1B	R2D	R2	Commercial	30	70	0	8	0	8	YES	N
	J	HOO - R2	Anaheim/Stanton	127-573-23	0.06	9441 KATELLA AVE	Res 1B	R2D	R2	Commercial	30	70	0	4	0	4	YES	N
1, 2, 4, 6, 7, 8	AT	HOO - R2	Midway City	142-031-26	0.46	7852 BOLSA AVE	Res 1C	R2	No Change	Commercial	30	70	0	32	0	32	YES	N
1, 2, 4, 6, 7, 8	AU	HOO - R3	Midway City	097-132-16	0.37	14941 JACKSON ST	Res 1C	R3	No Change	Commercial	30	70	0	26	0	26	YES	N
1, 2, 4, 6, 7, 8	AV	HOO - R3	Midway City	097-133-08	0.19	14942 JACKSON ST	Res 1C	R3	No Change	Commercial	30	70	0	13	0	13	YES	N
1, 3, 4, 6, 8	AW	HOO - R3	Midway City	097-134-01	0.18	14862 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AW	HOO - R3	Midway City	097-134-04	0.18	14892 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AW	HOO - R3	Midway City	097-134-26	0.36	14872 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	25	0	0	25	YES	N
1, 3, 4, 6, 8	AX	HOO - R3	Midway City	097-142-14	0.18	14941 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AX	HOO - R3	Midway City	097-142-15	0.18	14931 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AX	HOO - R3	Midway City	097-142-16	0.18	14921 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AX	HOO - R3	Midway City	097-142-17	0.18	14901 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
1, 2, 4, 6, 7, 8	R	HOO - R4	El Modena	383-061-01	0.51	11578 HEWES ST	Res 1B	R1	R4	Residential 4 units	30	77	40	0	0	40	YES	N
1, 2, 6, 7, 8	BE	HOO - R4	Orange/Olive	360-364-03	0.18	8621 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	13	0	0	13	NO	N

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
	BE	HOO - R4	Orange/Olive	360-364-04	0.15	16721 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	N
	BE	HOO - R4	Orange/Olive	360-364-05	0.15	16711 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y
	BE	HOO - R4	Orange/Olive	360-364-06	0.15	16701 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y
	BE	HOO - R4	Orange/Olive	360-364-07	0.15	16691 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y
1, 2, 3, 7, 8	BF	HOO - R4	Orange/Olive	360-364-01	0.40	8571 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	28	0	0	28	NO	Y
	BF	HOO - R4	Orange/Olive	360-364-02	0.18	8581 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	13	0	0	13	NO	N
1, 2, 6, 8	BG	HOO - R4	Orange/Olive	360-365-01	0.17	8631 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
	BG	HOO - R4	Orange/Olive	360-365-02	0.17	8641 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
	BG	HOO - R4	Orange/Olive	360-365-03	0.17	8651 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
1, 2, 3, 6, 7, 8	BH	HOO - R4	Orange/Olive	360-361-09	0.20	8582 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	14	0	0	14	NO	Y
	BH	HOO - R4	Orange/Olive	360-361-11	0.24	8500 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	17	0	0	17	NO	N
	BH	HOO - R4	Orange/Olive	360-361-12	0.24	8500 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	16	0	0	16	NO	N
1, 2, 7	BM	HOO CHURCH - MX	Rossmoor	086-521-11	0.95	11088 WALLINGSFORD RD	Res 1B	C2	MX	Educational/institutional/religious	0	84	40	0	0	40	NO	N
	BM	HOO CHURCH - MX	Rossmoor	086-521-19	1.17	3352 KATELLA AVE	Res 1B	C2	MX	Educational/institutional/religious	0	84	49	0	0	49	NO	N
1, 2, 3, 4, 6, 7	K	HOO CHURCH - R2	Anaheim/Stanton	127-572-25	0.53	10841 HARCOURT AVE	Res 1B	R2D	R2	Educational/institutional/religious	0	77	41	0	0	41	YES	N
1, 2,3 ,4 ,6 ,7	S	HOO CHURCH - R4	El Modena	383-061-02	1.83	11712 Hewes St	Res 1B	R1	R4	Educational/institutional/religious	0	84	154	0	0	154	YES	N
1, 2, 3, 7	L	NON HOO - CHURCH	Canyons	105-060-26	4.49	8002 SILVERADO CANYON RD	Res 1A	A1	No Change	Educational/institutional/religious	0	84	45	0	0	45	NO	N
2, 3, 6, 7	M	NON HOO - CHURCH	Canyons	105-051-84	8.28	27977 SILVERADO CANYON RD	Res 1A	A1	No Change	Educational/institutional/religious	0	84	180	0	0	180	NO	N
2, 3, 7	U	NON HOO - CHURCH	Ladera Ranch	780-041-01	6.39	26176 ANTONIO PKWY	Res 1B	SP	No Change	Educational/institutional/religious	0	84	60	0	0	60	NO	N
1, 2	AY	NON HOO - CHURCH	North Tustin	401-171-05	4.32	18542 VANDERLIP AVE	Res 1B	SP - PQP	No Change	Educational/institutional/religious	0	84	15	0	0	15	NO	N
5, 7	A	COYOTE CANYON	Newport Beach	120-571-11	15.54	CA-73 and Newport Coast Dr	N/A	N/A	N/A	vacant former landfill	0	0	0	0	0	0	NO	N
	A	COYOTE CANYON	Newport Beach	120-571-13	335.07	CA-73 and Newport Coast Dr	N/A	N/A	N/A	vacant former landfill	0	0	62	124	432	618	NO	N
2	AZ	NON HOO - CHURCH	North Tustin	395-401-02	9.41	13922 PROSPECT AVE	Res 1B	R1	No Change	Educational/institutional/religious	0	84	30	0	0	30	NO	N

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
3, 5, 7	B	RMV Master Plan	Mission Viejo	125-165-34	62.38	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	165	1000	3001	4166	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-35	63.67	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-36	63.67	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.40	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	NA	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.33	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.02	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.40	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.30	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	63.06	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.14	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.00	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.65	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	63.53	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	64.98	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.37	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.38	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	60.80	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.82	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	61.02	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.39	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	63.68	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	60.79	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	63.68	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-42	62.23	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.23	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
	B	RMV Master Plan	Mission Viejo	125-165-51	52.47	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.48	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	168.88	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	60.61	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	60.49	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	63.69	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.01	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N

* Site Suitability Criteria is discussed in the Sites Methodology section further in this chapter.

Figure B-2
County of Orange Candidate Sites
Unincorporated Area: Orange/Olive



Figure B-3
County of Orange Candidate Sites
Unincorporated Area: Anaheim (Area 1)

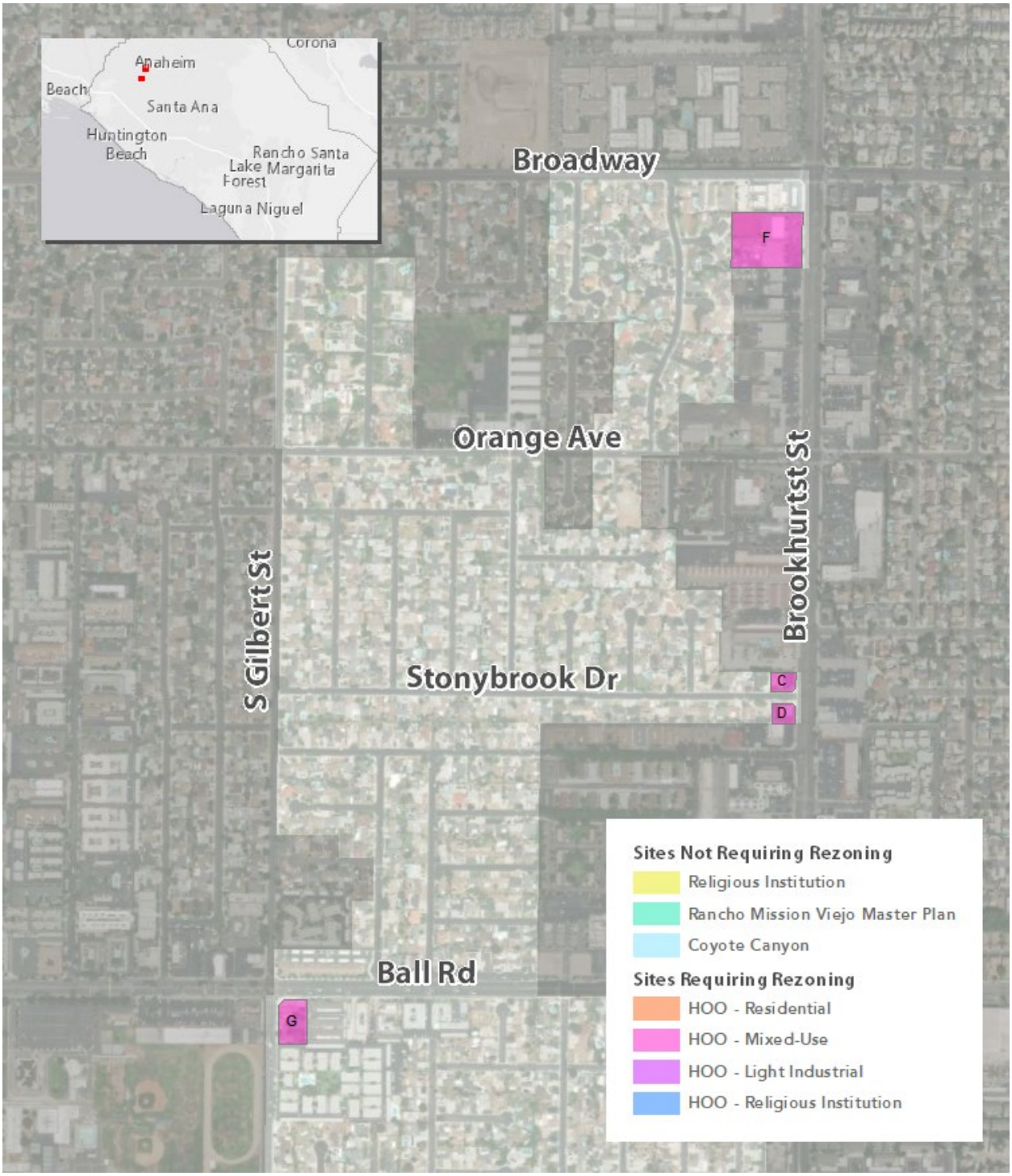


Figure B-4
County of Orange Candidate Sites
Unincorporated Area: Anaheim (Area 2)

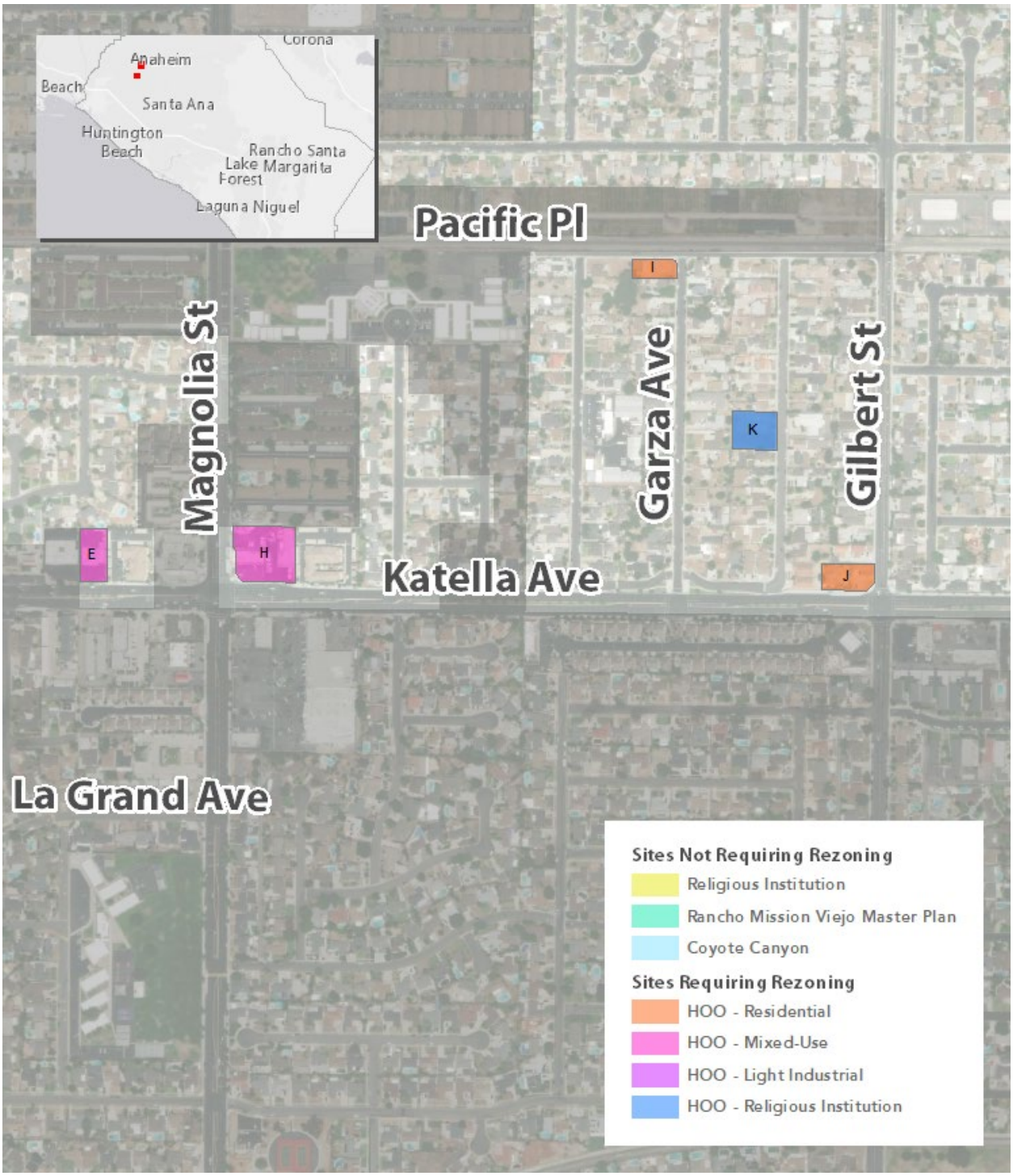


Figure B-5
County of Orange Candidate Sites
Unincorporated Area: El Modena



Figure B-6
County of Orange Candidate Sites
Unincorporated Area: Midway City (Area 1)

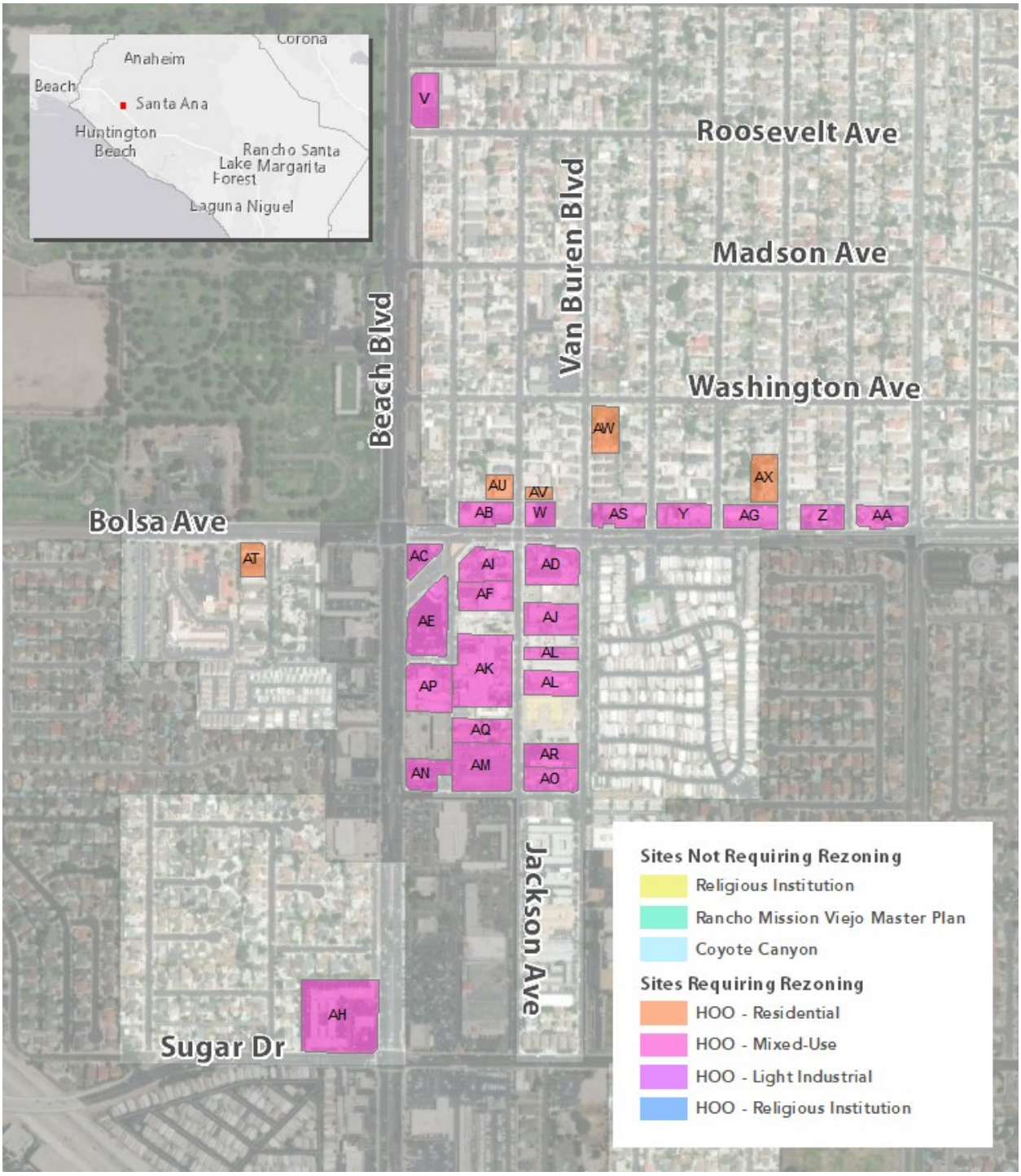


Figure B-7
County of Orange Candidate Sites
Unincorporated Area: Midway (Area 2)



Figure B-8
County of Orange Candidate Sites
Unincorporated Area: Rossmoor



Figure B-9
County of Orange Candidate Sites
Unincorporated Area: Yorba Linda Fairmont



Figure B-10
County of Orange Candidate Sites
Unincorporated Area: Canyons

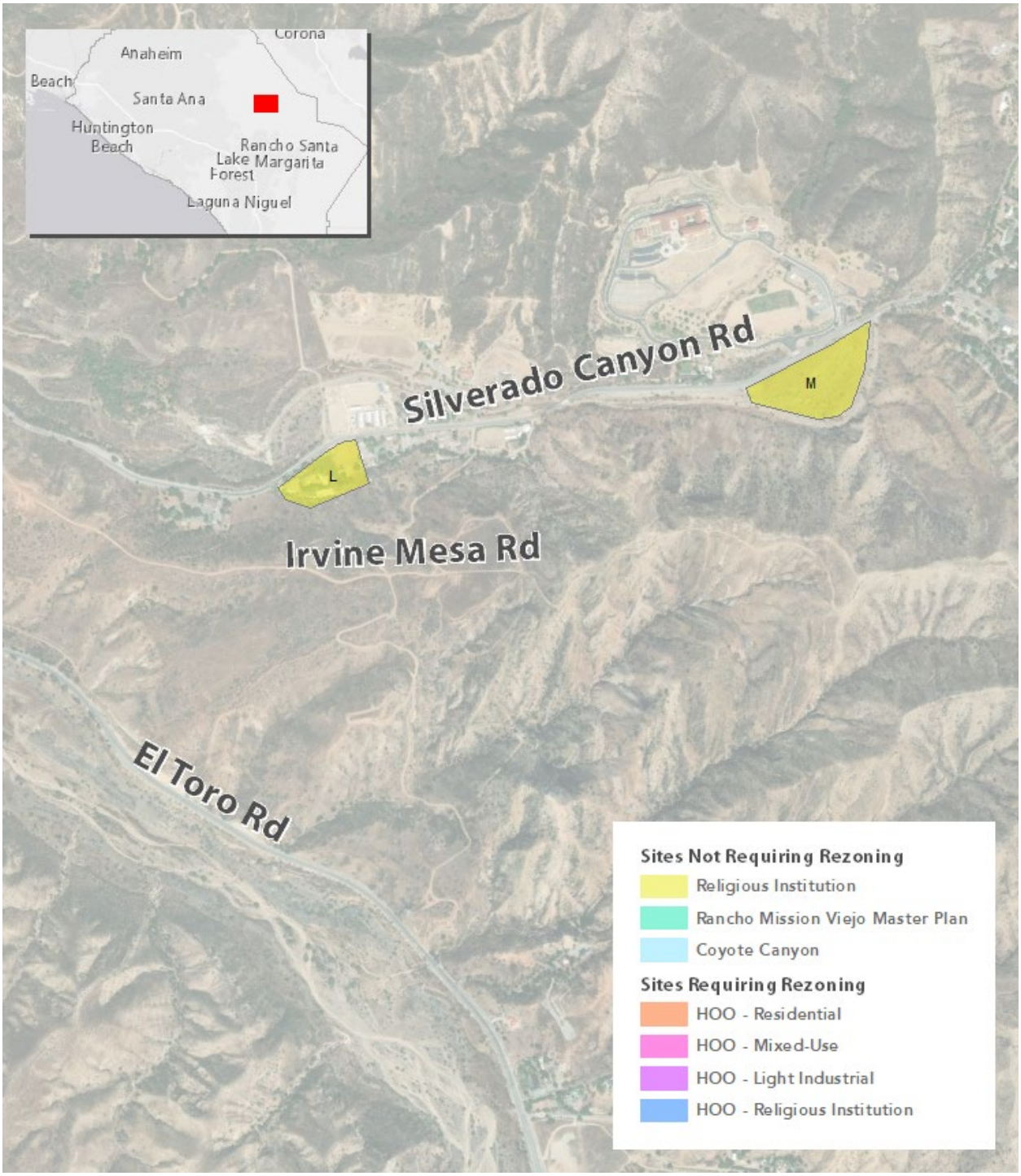


Figure B-11
County of Orange Candidate Sites
Unincorporated Area: Coyote Canyon

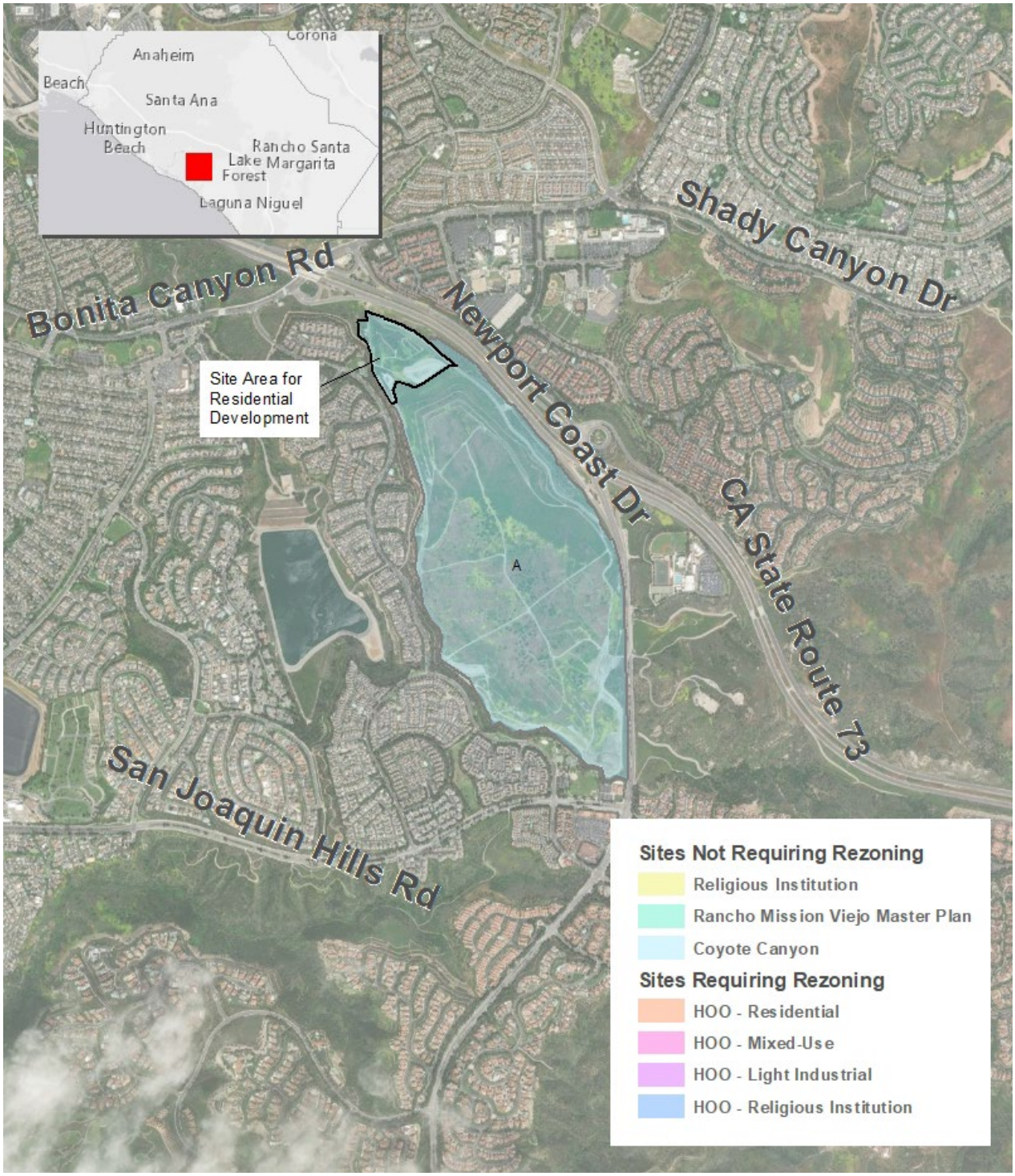


Figure B-12
County of Orange Candidate Sites
Unincorporated Area: Ladera Ranch

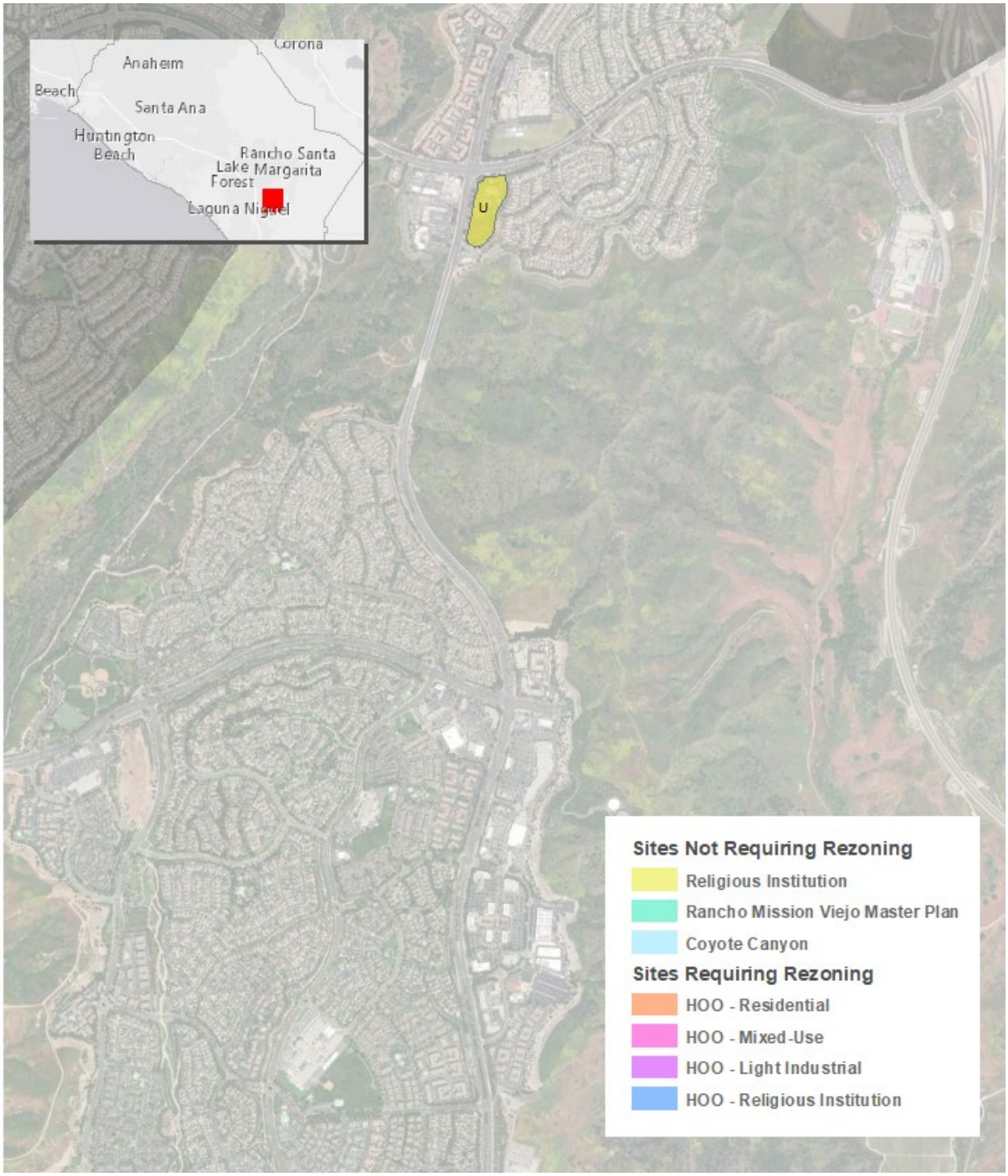


Figure B-13
County of Orange Candidate Sites
Unincorporated Area: North Tustin

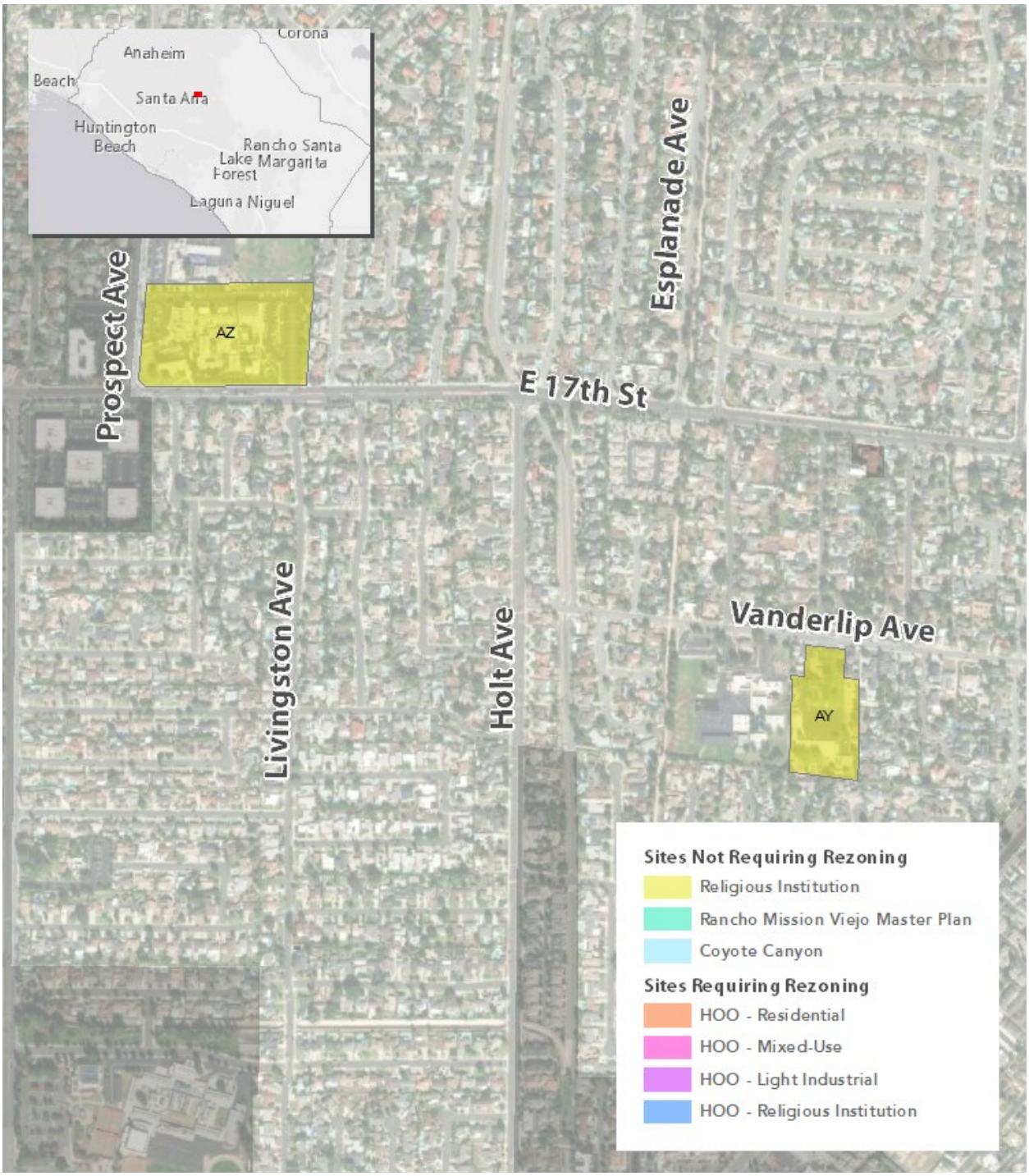
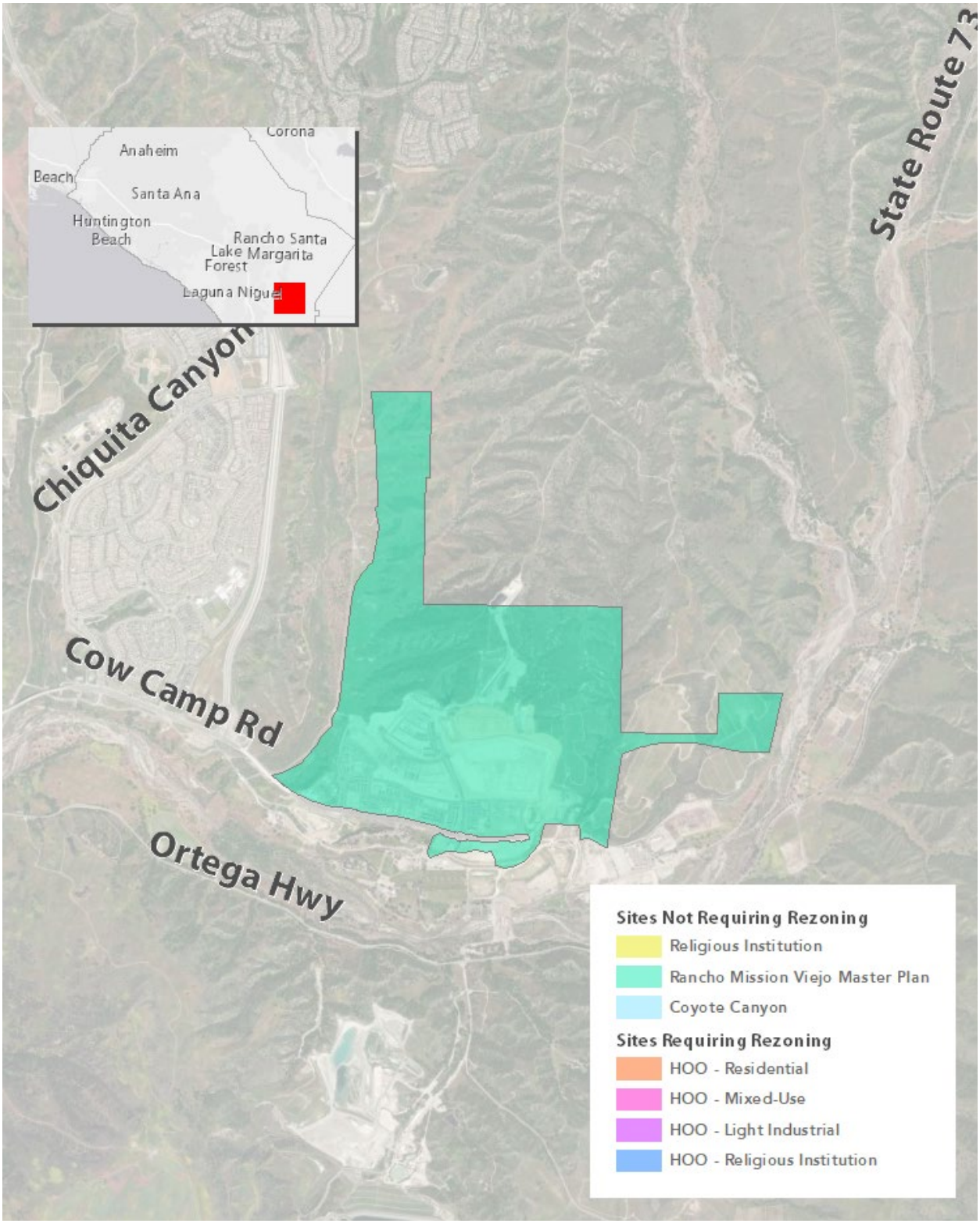


Figure B-14
County of Orange Candidate Sites
Unincorporated Area: Rancho Mission Viejo



Site Inventory Methodology

The County has identified parcels throughout the Unincorporated County areas within the County with a realistic capacity to meet their anticipated housing needs during the planning period (2021-2029). This is based on the demonstrated past development trends on sites within the Housing Opportunity Overlay (HOO). The County has a history of building fully affordable projects above the current maximum density as shown in **Table B-14.**

The majority of the identified candidate sites fall within the HOO which is described in more detail previously in this appendix. The identified sites have been evaluated to determine the extent to which on-site uses are likely to redevelop within the planning period. It was found that a number of the existing uses have the potential to redevelop based on redevelopment capacity, underdevelopment of the site, or other existing characteristics. Many of the uses are in multi-tenant commercial centers with one ownership and most show little to no evidence of recent investment or redevelopment.

Program 2 is the zoning action the County took to increase the maximum allowable density permitted within the HOO to 70 dwelling units per acre. The intent of this is to provide more flexibility for the development community to develop a range of affordable products at higher densities. This is a new development density within the Unincorporated County areas, but many cities within Orange County permit this density and build affordable housing. The following examples within Orange County are either primarily or fully affordable housing projects at or near the 70 dwelling units per acre capacity:

- Casa Paloma, Unincorporated Orange County (95 dwelling units/acre)
- Granite Court, Irvine (57.7 dwelling units/acre)
- Belage Manor, Anaheim (57.3 dwelling units/acre)
- Triada at the Station, Santa Ana (55.2 dwelling units/acre)
- Miracle Terrace, Anaheim (41.6 dwelling units/acre)

These projects represent developments that are at or near 100% affordability at the densities considered by the County of Orange and were used in coordination with local developers to determine an appropriate development density for the HOO.

Site Selection and Suitability

The County's RHNA for the 6th cycle Housing Element is accommodated primarily on non-vacant sites. Existing uses on the sites are older, are physically underdeveloped (relative to the potential capacity), or show signs of disinvestment or deferred maintenance, indicating a "ripeness" for private redevelopment. Key sites with existing uses that are "ripe" for redevelopment typically contain older structures and are underutilized given the development potential afforded. Some sites with existing lower-density residential uses provide the

opportunity for significant capacity increases.

The County anticipates increased residential developments in the HOO areas as there is a general lack of developable residential land in the Unincorporated County and a corresponding, critical need for more housing. There has been a marked increase in inquiries and expressed interest by property owners to redevelop non-residential sites into residential uses, a trend seen in the surrounding region.

Underutilized sites included in this inventory have been chosen based on observable and established redevelopment trends of properties and the potential capacity increase available to property owners. State law requires the County to consider lease terms in evaluating the use of non-vacant sites, however the County does not have access to private lease agreements or other contractual agreements amongst parties because they are private documents. Therefore, the County 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 the Unincorporated County.

State law includes specific criteria for assessment of the realistic availability of non-vacant sites during the planning period. If non-vacant sites accommodate half or more of the lower-income need, the Housing Element must present "substantial evidence" that the existing use does not constitute an impediment to additional residential use on the site. Due to the built-out nature of the Unincorporated County of Orange, most sites have existing uses.

The site suitability criteria below were used to identify underutilized parcels and are listed in Table B-8 under the Site Suitability Criteria column. These criteria help gauge development readiness by identifying properties that align well with current market trends and logistical feasibility. Access to transit increases a site's attractiveness by enhancing connectivity and supporting sustainable growth. Lastly, government ownership or pending development projects often suggest a readiness for change, with fewer barriers and potentially faster project timelines.

Site Suitability Criteria:

1. **Size**: is crucial, as parcels that are neither too small nor too large are often more adaptable to typical development projects in the area. Development trends for affordable projects in the Unincorporated County show an average size of 1 acre. Excluding the County-owned Coyote Canyon site and the Rancho Mission Viejo Master Plan area, the average site size is 1.7 acres. Sites ranging from 0.5 to 5 acres are considered ideal and are highlighted according to this criterion. The size criterion is applied only to County projects, as detailed development information from other cities is limited to what is available publicly.

2. **Existing uses** like those being redeveloped nearby (see Tables B-9 and B-10) indicate compatibility with ongoing transformations, which can streamline the planning process. The existing uses represented in the development trend examples and site inventory primarily consist of older commercial properties, auto-related uses, and religious institutions.
3. **Existing use** is a parking lot, outdoor storage, or other uses that have low or limited lot coverage (includes vacant land). Low or limited lot coverage, including vacant land, signals underutilization, making these sites ideal for new development. A site can have existing uses that fall within both criteria 2 and 3 in the cases of uses that are typical for redevelopment projects and also are highly underutilized.
4. High Quality Transit Area (**HQTA**): Access to transit increases a site's attractiveness by enhancing connectivity and supporting sustainable growth. In California, projects within HQTAs may qualify for several development incentives designed to promote sustainable, transit-oriented growth
5. **County ownership** or there is **pending development** on the site.

The following criteria were used to screen sites; however, due to limited data on these factors for completed projects, they cannot be directly linked to past developments in the Unincorporated County or surrounding region. Although the County of Orange does not currently track these criteria, they remain important indicators of development readiness because they highlight the potential for redevelopment.

6. **Land/improvement value ratios**: reveals whether the land is underutilized; a high ratio often suggests that the property could be repurposed to maximize value. I/L ratio above 1 meets this criterion. Excluding the County-owned Coyote Canyon site and the Rancho Mission Viejo Master Plan area, the average land-to-improvement value ratio is 12, signaling a high degree of underutilization.
7. **Common or consolidated ownership**: simplifies the decision-making process, reducing delays in negotiations or approvals, and making redevelopment more feasible.
8. **Existing Building Conditions**: indicates the need for upgrades or replacements; older or deteriorating buildings are often prime candidates for redevelopment as they require significant investment to meet current standards. As part of the site inventory refinements, we conducted a visual review of each site and, drawing on our development experience, assessed its readiness for redevelopment. Visual cues included large undeveloped areas or sites along major corridors primarily used for surface parking. Aging or deteriorating buildings, or those showing signs of deferred maintenance, were also identified. identified as cues.

Some of the factors mentioned here, as well as those shown in Table B-8, are further discussed in the following section.

Existing Use

Existing uses on the identified sites to be rezoned do not pose a constraint to development and are expected to transition during the planning period. This is supported by development demand

for the identified sites, expressed interest from developers, and past residential and mixed-use development trends (Table B-9) which has primarily consisted of new multifamily buildings replacing older buildings on infill sites. Most of the uses on the identified sites are similar to those that have been previously recycled in surrounding communities.

Vacant Sites
The Coyote Canyon site and portions of the Rancho Mission Viejo site are both vacant. Of the sites that required rezoning, only two sites are vacant.

Non-vacant sites
Close to 80% of the parcels in the site inventory (exclusive of the church properties) are developed with commercial or commercial type uses (such as auto repair uses) and 20% have residential uses.

- *Commercial uses*: Sites with existing uses are like uses that have been recycled previously in the Unincorporated County and region. **Table B-14** shows that five out of the nine affordable developments since the establishment of the HOO were previously developed with commercial uses. Two key projects are:
  - 9541-9581 W. Ball Rd (Cornerstone) – This fully affordable project is directly adjacent to Ball Road in a primarily commercial district. The previous use was a mixed-use commercial office and retail building.
  - 9051 & 8911 Katella (Stonegate I and Stonegate II) – These fully affordable projects are on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants. These parcels were previously commercial car and RV storage.
- *Commercial/Industrial Uses*: Sites in non-residential areas are predominantly commercial but many are in areas historically developed with industrial uses that have slowly transitioned to commercial uses and more recently to high-density residential uses. The County also has experience permitting development on sites that were previously industrial and manufacturing uses. In the Unincorporated Midway City community, for example, there is a cluster of sites currently developed with auto repair and used car sales in an area with a light industrial feel. Casa Paloma is a fully affordable housing project developed on the site of a previous pottery manufacturing facility. This project, located in Midway City, is surrounded by a mixture of light industrial, commercial, and residential uses. It is a 71-unit affordable housing development with a density of 63.4 du/ac on just

over one acre in size. However, there has been a marked transition to residential uses given the high demand for housing. The Jackson Street housing development is a 65-unit affordable development on about a three-quarter acre site with a density of 87.25 du/ac on a site that was previously developed on a site that was in use as an automobile related business and one single family home.

- *Residential Uses*: 29 parcels in the inventory are currently developed with residential units, a trend supported by the projects in **Table B-14** where six of all the 12 projects were previously developed with similar residential uses. Recognizing that redevelopment of higher -density housing is challenging and unlikely, all identified sites with existing residential uses have less than 5 housing units. Only one parcel has 4 units, one other parcel has two units, and 27 parcels have only one unit. All parcels with a residential use have the potential for significant capacity increases. In fact, the estimated capacity increase on these parcels ranges from 4.5 to 28 times the number of existing units. This is a typical trend for housing developments on properties with existing uses. Potters Lane, a 16-unit affordable development in Midway City was developed on a site previously in use as a single-family home. The project was developed on a site under half an acre in size and achieved a density of 39 du/ac on a site that had a maximum allowed density of 25 du/ac.
- Religious Institution Uses: There are only nine religious institutional sites in the inventory that were chosen based on the availability of excess vacant property or large parking lots, that could accommodate residential development without assuming removal or replacement of church buildings. Throughout California, the development of affordable housing on religious properties has become an increasing trend (due also to the homeless crisis). Nonprofit organizations such as Many Mansions and National CORE have assisted many religious facilities to convert their surplus land and underutilized parking lots into affordable housing. Housing development is also beneficial to the owners. Redevelopment of affordable housing can provide a stream of rental revenue that can replace declining income and lower membership numbers. Religious institution land is ideal for housing development as many in Orange County are in well-established communities that have access to greater economic and educational amenities. Key examples of church housing projects in the County and region are listed below.
    - In 2016, the Brothers of Saint Patrick Novitiate Monastery, located in the Midway City area of the Unincorporated County, rezoned a 3.6-acre portion of a 5.4 acre property to develop a three-story, 88-unit age-restricted (62+) senior housing community known as “The Retreat”. The project has a density of 24.4 du/ac (on a site that allowed a maximum

density of 20 du/ac) and was developed prior to legislation facilitating development on religious institutional properties.

- In Anaheim, two projects on church properties have resulted in the development of 65 new housing units. Wesley Village is an affordable housing development built on the grounds of the Garden Grove United Methodist Church in partnership with, Jamboree Housing Corporation, a non-profit developer. The developer entered a 60-year ground lease with the church, repurposing 2.2 acres of excess parking space and unused vacant land. The 47-unit development, opened in 2017, includes the addition of a family apartment building, senior apartment building and Head Start learning center. The 18-unit Walden development was built on the St. Mark's Lutheran Church property that was being leased to other congregations. Also in Anaheim, in 2023, St. Michael's Episcopal Church and its partner church, St. James' Church in Newport Beach, worked with Habitat for Humanity to build 24 affordable townhomes.
- In Buena Park, the 66-unit, affordable Orchard View Senior Apartments is under development as partnership between National CORE and St. Joseph's Episcopal Church. The project weas developed on underutilized church land.
- In 2024, the Santa Angelina Senior Community was developed by National CORE at the Episcopal Church of the Blessed Sacrament in Placentia. The development provides 65 affordable apartment homes to seniors aged 62 or better who earn less than 60% of the area median income (AMI). Because of the location, residents of Santa Angelina belong to an engaged, service-enriched village linked to the adjacent church and surrounding community.
- In early 2025, Inglewood First United Methodist in Los Angeles is scheduled to begin construction on 60 studio apartments that will replace three empty church buildings.
- A 25-unit housing development At Trinity Lutheran Church in the City of Whittier was approved in 2021. The church sold part of its property that had a defunct school building.
- IKAR, a Jewish congregation in Los Angeles has plans to break ground in 2025 on a new synagogue that will include a worship space, a preschool and 60 units of affordable housing in the Mid-City neighborhood, where the typical home is valued at $1.8 million.

- The Diocese of Los Angeles, which spans from Santa Barbara County to the San Diego County line has committed to building affordable residential units on 25% of the diocese's 133 church campuses serving low-income families, seniors, refugees, and homeless people. The diocese's churches are working with development partners to build and maintain apartment complexes on land held in trust by the diocese that's being leased to its various partners. The diocese is working with partners in Placentia, Buena Park, Anaheim, Claremont, Downey, Garden Grove, Gardena, Rialto, Riverside and others.
- In 2019, Clairemont Lutheran Church members in San Diego an affordable housing project on part of their parking lot. Clairemont Lutheran Church ultimately envisions a roughly 16-unit affordable rental for San Diego residents transitioning out of supportive housing.

Regional Trends

Regional trends in **Table B-10** look at three north Orange County cities as they are physically close to the identified sites and are areas with similar existing uses, development patterns, and housing markets. Residential development trends in surrounding cities indicate a higher demand for residential uses in areas with limited land availability, often leading to the redevelopment of commercial properties. This shift is evident as commercial areas and properties originally developed for commercial uses are increasingly being converted to meet residential needs. Previous uses for the developments shown in **Table B-10** are like the existing uses on the HOO rezoning sites in the inventory.

Table B-9
Recent Redevelopment Trends in Unincorporated Orange County

Affordability	Residential Developments	Units	Zoning	Size	Prior Use	Site Suitability Criteria
Affordable	Cornerstone 9541-9581 W Ball Rd 127-284-01	49	CN Commercial Neighborhood	1.45	Commercial (Office/Retail Building)	1, 2
Affordable	Avenida Villas 9602-9612 W Ball Rd	29	R3	0.82	Medical Office Building	1, 2
Affordable	Buena Vista 16451 E Buena Vista St	17	C2	0.51	Vacant	1, 3
Affordable	Stonegate I 9051 Katella	38	C1	1.15	Commercial/Car and RV storage	1, 2, 4, 5
Affordable	Stonegate II 8911 Katella	26	C1	0.76	Commercial/ RV rentals	1, 2, 4
Affordable	Cerritos Family, 9501 W Cerritos	60	R2 Multifamily Dwellings	2.05	Church	1, 2
Affordable	Potter's Lane, 15171 Jackson	16	C2	0.41	Single-Family Residential Unit	1, 2, 4
Affordable	Casa Paloma 15162 Jackson,	71	C2	1.12	Pottery Manufacturing Facility	1, 4

Table B-9
Recent Redevelopment Trends in Unincorporated Orange County

Affordability	Residential Developments	Units	Zoning	Size	Prior Use	Site Suitability Criteria
Affordable	Jackson Street 15081 Jackson Ave, 15072 Adams, 15082 Adams	65	C2	0.75	Single family and commercial (automotive) use	1, 2
Market-Rate	14892 Van Buren St Midway City	3	R3	0.18	Vacant	1, 3, 4
Market-Rate	14621 Adams St, Midway City	4	R3	0.22	Single family unit	1, 3, 4
Market-Rate	14881 Newland St Midway City	4	R3	0.18	Duplex	1, 2, 4
Market-Rate	14682 Adams St Midway City	4	R3	0.4	Single family unit	1, 3, 4
Market-Rate	14672 Adams St Midway City	4	R3	0.4	Single family unit	1, 3, 4

Table B-10
Recent Redevelopment Trends in the Region

City	Project	Units	Description	Previous Use	Status	Year	Site Suitability Criteria
Garden Grove	Brookhurst Triangle	800	800 units on 13.9 acres and 200,000 sf of commercial uses (mixed-use) _	Commercial buildings/uses and used auto dealerships	Completed	N/A	2, 4
Garden Grove	Century Triangle	53	53 townhomes	Commercial buildings/uses and used auto dealerships	Completed	N/A	2, 4
Garden Grove	Lotus Walk	159	159 condominiums on 3.8 acres	Office buildings	Completed	2010	1, 2
Garden Grove	Wesley Village	47	47 affordable units on 2.5 acres	Garden Grove United Methodist Church and pre-school and the Head Start program	Completed	N/A	1, 4
Garden Grove	Garden Brook Senior Village	394	394 affordable units on 5.1 acres (mixed-use)	Vacant buildings from a prior car dealership	Completed	N/A	1, 3, 5
Garden Grove	Site Plan No. SP-138-2024 & Tentative Tract Map No. TT-19314	35	35 condominiums on 1.4 acres	SF Residence	Under Development	2024	1, 2, 6
Garden Grove	Grove Senior Apartments 12811 Garden Grove Blvd	85	85 senior apartment units on < 2 acres	Restaurant and automotive buildings/use	Completed	N/A	1, 2
Garden Grove	Harbor Grove Senior Apartments	93	93 senior apartment units on 1. 3 acres	Commercial buildings	Completed	N/A	1, 2
Garden Grove	Sungrove Senior Apartment Homes 12811 Garden Grove Blvd – 12142 Tamerlane Dr.	93	93 senior apartment units < 2 acres	Commercial buildings (flower shop, dairy shop, coin-operated car wash)	Completed	N/A	1, 2
Garden Grove	Bria Townhomes	31	31 townhomes	Intermediate care facility for developmentally disabled	Completed	2020	1, 2
Garden Grove	9691 Bixby Avenue	27	27 units (2 affordable) with some tandem parking on 0.83 acres	Daycare facility	Undergoing Review	2023	1, 2

Table B-10
Recent Redevelopment Trends in the Region

City	Project	Units	Description	Previous Use	Status	Year	Site Suitability Criteria
Garden Grove	13252 Brookhurst Street	24	24 townhomes or 35 townhomes on 1.22 acres	Restaurant building and/or rental car lot	Undergoing Review	2023	1, 2
Garden Grove	8322 Garden Grove Blvd	19	19 attached units (2 affordable) on 0.74 acres	Commercial buildings	Undergoing Review	2023	1, 2
Garden Grove	13002 Nina Pl	15	15-unit apartment building (2 affordable) on 0.4 acres	Commercial buildings and single-family residence	Undergoing Review	2023	1, 2
Garden Grove	9891 Garden Grove Blvd	59	59-unit apartment building on 0.8 acres	Auto repair building/use	Undergoing Review	2023	1, 2
Garden Grove	9961 Garden Grove Blvd	55	55-unit affordable apartment building on 0.4 acres	Used auto dealership buildings/use	Undergoing Review	2023	1, 2
Garden Grove	8642 Garden Grove Boulevard	23	23-unit mixed-use project on 0.3 acres	Commercial and office buildings	Undergoing Review	2023	1, 2
Garden Grove	10231 Garden Grove Blvd	52	52-unit mixed-use project (on 1.9 acres)	Commercial building (furniture store) and used auto dealership	Undergoing Review	2023	1, 2
Garden Grove	Pearl Street Work-Live 10662 Pearl St	#	10-unit work-live mixed-use project on 0.7 acres	Commercial buildings (bicycle shop) and a single-family home	Undergoing Review	2023	1, 2
Garden Grove	8734 Garden Grove Blvd	20	19 attached units (affordable) on 0.9 acres	Used car auto dealership	Undergoing Review	2023	1, 2
Westminster	Della Rosa 14800 Beach Blvd	50	a 50-unit affordable housing development on 0.8 acres	Older commercial strip mall	Completed	2020	1, 2
Westminster	Westminster Crossing	65	65-unit affordable housing project on 1.97 acres	Underutilized commercial building	Completed	2019	1, 2
Buena Park	Clark Commons 8004 Orangethorpe Avenue	70	70 affordable deed restricted multifamily units on 1.94 acres	Strip Retail Center	Completed	2017	1, 2
Buena Park	Orchard View Senior Apartments 8300 Valley View Street	66	66-unit affordable age restricted multifamily residential (proposed/under review) on 1.76 acres	Religious facility, parking lot	Under Construction	2024	1, 2
Buena Park	Indigo Walk 8281 Page Street	54	54-unit multifamily residential on 2.33 acres	Religious facility, parking lot	Under construction	2019 or 2020	1, 2
Anaheim	1619-1699 W Lincoln Ave	115	115 townhomes on 7 acres	Manufacturing business and 2 auto dealerships	Completed	2023	2

Table B-10
Recent Redevelopment Trends in the Region

City	Project	Units	Description	Previous Use	Status	Year	Site Suitability Criteria
Anaheim	Downtown Anaheim 39 702-798 N Ethan Way	39	39-unit multifamily complex on 1.6 acres	RV storage	Completed	2022	1, 2
Anaheim	312-400 S Euclid	39	39-unit townhome complex on 2.3 acres	small office, small strip mall, restaurant	Completed	2022	1, 2
Source: Cities of Anaheim, Garden Grove, Beuna Park, and Westminster 2021-2029 Housing Elements							

Lot Consolidation

Due to the historical parcelization pattern in many areas of the Unincorporated County, the inclusion of small sites in the inventory is expected. To adhere to State law and HCD guidance, there are no stand-alone small sites used to meet the lower-income RHNA. The County includes lot consolidation as part of the development review process. Lot consolidation is done as part of the mapping process and approved with initial entitlements. This does not place additional requirements outside of the County's typical development process on an applicant and is approved concurrently. **Table B-14** shows that four large affordable projects included lot consolidation. These projects have a combined capacity of 149 units. These 4 projects have an average size of less than one acre. This size and lot consolidation pattern matches the site inventory. While multi-parcel sites under common ownership are ideal, it is unrealistic. Nonetheless, more than half (55%) of the multi-parcel sites are either fully under common ownership (one owner) or have several parcels under common ownership, which can make sales and/or lot consolidation easier.

- Avenida Villas (2011): this 29-unit affordable project was developed on a site that was less than 1 acre in size. The project included consolidation of two small (<0.5 acres) parcels and resulted in a density of 35.4 units per acre.

- Buena Vista (2011): this 17-unit affordable project was developed on a half-acre site. The project included consolidation of two small (<0.5 acres) parcels and resulted in a density of 33.3 units per acre.

- Stonegate (2009): this 38-unit affordable project was developed on a 1.15-acre site. The project included consolidation of two parcels (one was under half an acre in size) and resulted in a density of 33 units per acre.

- Jackson Street (2022): this 65-unit affordable project was developed on a 0.75-acre site. The project included consolidation of three small (<0.5 acres) parcels and resulted in a density of 87.3 units per acre.

Table B-14 demonstrates that lot consolidation, the assembly of small parcels, and the development of small sites do not constrain housing development. Of the 371 affordable units (across nine projects) developed within the HOO, 40% (149 units) involved lot consolidation, including a recent project yielding 65 affordable units on a site under one acre. Projects outside the HOO show lower levels of lot consolidation, as these tend to be smaller—averaging 0.3 acres, as shown in Table B-15. Table B-14 identifies the projects that included consolidation of small parcels (<0.5 acres).In the Housing Opportunities Overlay, lot consolidation is incentivized by higher allowable densities. The County's Zoning Code grants graduated density increases to projects that consolidate based on project size after lot consolidation (section 7-9-44.7 of the

Zoning Code). The County's Code reads "A graduated density incentive shall be granted when parcels smaller than one-half (0.5) acre are consolidated as part of a project. The increased density shall be in addition to any other density bonus available under this Zoning Code, to a maximum of 45% total, and shall be calculated as follows." (Shown in **Table B-11** below.) The graduated density incentives in the zoning code are aimed at facilitating and encouraging lot consolidation to ensure that these smaller sites can appropriately provide additional residential units. For example, projects on sites under 0.5 acres can reach densities of up to 70 units per acre, while larger consolidated sites can achieve densities of 77 to 84 units per acre, depending on the final project size. This incentive has spurred consolidation of very small parcels, as seen with the Buena Vista project, which combined two parcels to create a half-acre site. The combination of strong residential demand, development incentives, and a proven track record of successful lot consolidations demonstrates that this approach is both realistic and achievable. In contrast, recent market-rate projects outside the HOO, as shown in Table B-9, tend to be smaller and typically do not involve lot consolidation—further evidence that development and lot consolidation are effectively incentivized within the HOO.

To reinforce its commitment to housing development, the County has committed under Program 3 of the Housing Plan to create informational resources on its website detailing lot consolidation incentives and the density bonus program. Additionally, it will produce and distribute lot consolidation incentive materials in early 2025.

Table B-11
Graduated Density Increase within HOO

Project Size (after lot consolidation)	Base Density (per net development area)*
Less than 0.50 acre	70 units/acre
0.50 to 0.99 acre	77 units/acre (10% increase)
1.00 acre or more	84 units/acre (20% increase)
**Note: Base densities will be updated based on the increased density permitted within the HOO per Housing Element Program 2*	

Site Conditions

Site conditions were an additional criterion for site selection. Underutilized sites consist of existing uses that are older or show signs of disinvestment or deferred maintenance, indicating a "ripeness" for private redevelopment. Many parcels in the inventory are currently developed with commercial uses and have a high potential for conversion to residential or mixed-use based on existing site characteristics such as deteriorated or vacant structures, low building value compared to land value, or marginal economic uses (e.g., used car sales).

Comparing assessed improvement value with assessed land value provides insights into the composition of a property's value, revealing the relative contributions of buildings and land. It indicates investment levels, development status, and potential for future improvements. For planners and policymakers, it informs zoning decisions and highlights areas for potential

redevelopment or infrastructure enhancement. In this site inventory an improvement/land comparison shows that most sites have land values that are higher than improvement values which signifies ripeness for development. The average improvement to land value ratio for non-church HOO sites is 0.6 which suggests that the existing buildings or improvements on the identified HOO sites (exclusive of religious institutions) may be underutilized or outdated or that the current use is not maximizing the land's potential. Such properties are often prime candidates for redevelopment, as investors and developers see opportunities to replace or significantly upgrade the current structures to better align with the land's high value and potential for higher returns. Of the parcels where improvements and land value data were available, only 11 parcels (out of the 146) had a ratio over 1.54 and in almost all cases those parcels were not stand alone uses but in site grouping where the majority of the site had a ratio under 1.54.

Identifying potential sites must balance available information on the site with a visual and contextual assessment. While data pointing at older structures or high improvement value can give a good sense of the redevelopment potential, for many sites visual cues are important. There are a few sites where the data indicates a higher improvement value or a newer structure, but a visual assessment shows that a structure shows signs of disrepair or is underdeveloped in comparison with development nearby. The site with the largest ratio value was visually assessed as a single-family home on a larger lot in extreme disrepair. The site shows clear signs of neglect and lack of maintenance, with visible exterior deterioration such as peeling paint and damaged fixtures. The unused pool and presence of trash in the yard further indicate a state of disuse and disregard for upkeep. Its location in a neighborhood that is transitioning to multifamily uses, along with an allowed density that would allow a 12-fold increase in units, made it an ideal candidate for redevelopment.

Location

In addition to an on-the-ground existing use analysis, the County of Orange has market conditions to facilitate the redevelopment of non-vacant sites for residential. 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.[26] Additionally, according to the CAR Current Sales and Price Statistical Survey, the median cost of a home for sale in Orange County increased by 20% from

[26] Median time on Market of Existing Detached Homes, Historical Data, California Association of Realtors (CAR), Accessed online: December 9, 2021. https://www.car.org/marketdata/data

2020-2021 (from $930,000 in October 2020 to $1,120,000 in October 2021).[27] The indicators above signify an increased market demand for new housing.

All sites requiring rezoning are urban, infill sites and do not have any environmental or infrastructure constraints. 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, dry utilities services, and other infrastructure to service the candidate sites. No sites have easements that would reduce development potential (e.g., roadway or major utility easements).

Housing Opportunity Overlay

It is important to recognize that this inventory of potential development sites is much smaller than the entire Housing Opportunities Overlay Zone because it only includes high potential sites based on the site suitability criteria listed above and in the following description of specific communities. Based on the allowable density of 70 to 84 units per acre excluding any density bonus, the total capacity of the Housing Opportunities Overlay Zone is more than 5,000 additional lower-income units. This is a conservative estimate since any residential project within the Housing Opportunities Overlay Zone will also qualify for a density bonus. **Table B-14** lists residential development projects that have been constructed on parcels within the HOO. The County has been successful in redeveloping non-vacant sites zoned for other than residential uses for development of housing.

The County has received letters of support from local affordable housing developers indicating their experience in developing in the HOO. These letters are shown in Appendix C (**Figures C-1 to C-2)** and are from developers who have previously built over 100 affordable units within the HOO. They demonstrate support for the HOO as well as prove, along with the projects, below, the effectiveness of the HOO in affordable housing being developed within the County of Orange.

High Quality Transit Areas

The Southern California Association of Governments (SCAG) developed a mapping tool for High Quality Transit Areas (HQTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. A Significant portion of the Unincorporated County, particularly in the north, is within a HQTA and provides Significant incentives for development of affordable housing:

[27] Current Sales and Price Statistics, California Association of Realtors (CAR), Accessed online: December 9, 2021. https://www.car.org/marketdata/data

- Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop.
- Assembly Bill 2097 (AB 2097) prohibits cities and counties from enforcing minimum parking requirements for residential, commercial, and other types of developments located within half a mile of public transit. Developers can decide how much parking to provide based on market demand rather than being bound by local government mandates. This flexibility can lead to more innovative and cost-effective project designs.

Of sites that required rezoning, more than half (51%) of the lower-income site capacity is located on sites within a HQTA. Close to half (48%) of all site capacity is on sites within a HQTA. Recent projects in the Unincorporated County have benefited from HQTA incentives.

The eight affordable housing projects built since 2006 are located on or adjacent to transportation corridors. For example. Stonegate I and Stonegate II are fully affordable projects located on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants. Casa Paloma, a 71-unit multifamily affordable housing apartment community, was developed in accordance with the Housing Opportunities Overlay Zone Regulations and qualified for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project's proximity to a major transit stop also permits use of modified parking standards.

Incentives for Redevelopment:

The County's successful track record of facilitating the development of affordable projects since the adoption of the Housing Opportunities Overlay Zone in 2006, combined with the ongoing efforts of Planning and Housing staff, will create the regulatory framework to encourage housing development to the extent as economic conditions improve allow.

As discussed previously, the County's Zoning Code currently incentivizes lot consolidation within the Housing Opportunities Overlay by granting graduated density increases to projects that consolidate based on project size after lot consolidation (section 7-9-44.7 of the zoning code). Sites that are one or more acres in size have a maximum density of 84 du/ac compared to the base density of 70 du/ac for sites less than half an acre in size.

Due to the County's extensive experience with affordable housing development, they are skilled at collaborating with developers to maximize land use and leverage regulatory incentives to facilitate affordable housing development, as shown in **Table B-12.**

Table B-12
Incentives Granted to Affordable Housing Developments within the HOO

Project Address/ APN	Dwelling Units	Size	Incentives Granted
Cornerstone 9541-9581 W Ball Rd 127-284-01	49	1.45 acres	• Over-height walls and lighting standards • Decreased front setback
Avenida Villas 9602-9612 W Ball Rd 127-341-52	29	0.82 acre	• Over-height walls and lighting standards • Decreased front setback • Use of commercial parking standards
Buena Vista 16451 E Buena Vista St 360-383-02, 360-383-03	17	0.51 acre	• Over-height walls • Decrease in minimum drive aisle width
Stonegate I 9051 Katella 127-621-06, 127-621-07	38	1.15 acre	• Reduced length of parking spaces • Additional ten feet in height of building • Over-height walls and lighting standards
Stonegate II 8911 Katella 126-503-29	26	0.76 acre	• Reduced length of parking spaces • Additional ten feet in height of building • Over-height walls and lighting standards
Cerritos Family 9501 W Cerritos 127-401-39	60	2.047 acres	• Reduced depth of parking stalls and drive aisle • Reduced front setback • Over-height walls and lighting standards
Potter's Lane 15171 Jackson 107-151-16	16	0.41 acre	• Reduced length of parking stalls
Casa Paloma 15162 Jackson, 15182 Jackson 107-180-11, 107-180-23	71	1.12 acre	• Increase of maximum building height • Unlimited density bonus

Realistic Capacity Approach

Consistent with HCD guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. Due to the limited availability of residential land, many property owners and developers may opt for a density bonus to increase the unit count. Starting in 2021, residential projects in California with on-site affordable housing can get a density bonus of up to 50 percent. Previously, under Government Code Section 65915—commonly known as the Density Bonus Law—the maximum bonus was 35 percent. In addition, provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop.

Housing Opportunities Overlay (HOO)

The 6th Cycle RHNA sites inventory includes 59 sites within the HOO. The HOO is a zoning overlay district that provides for the development of 100% affordable rental housing by-right (without a use permit) within commercial, mixed-use, and industrial districts, and on building sites zoned for high density residential uses. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning. Most sites within the site inventory have

a residential (R-2, R-3, and R-4) or mixed-use (MX) underlying zone. Maximum allowable density (ranging from 77 to 84 du/ac) for the HOO is used to calculate realistic capacity of the sites based on the County's strong record in development of affordable housing in the HOO, new zoning regulations that prioritize housing development in non-residential areas, and incentives to achieve higher densities through lot consolidation.

All HOO sites have underlying zoning that has been amended to require a minimum residential density of 30 du/ac and a maximum of 43.5 du/ac. The HOO densities range from 70 du/ac to 84 du/ac depending on site size. This graduated density approach incentivizes affordable residential development for larger projects or projects that consolidate multiple properties. For multi-parcel sites in the inventory, the HOO density applied in the inventory is not based on overall combined site size but rather on the individual parcel size. For example, a site can have three parcels in a range of sizes with three different maximum densities. This is a more conservative approach for calculating capacity and in most cases means that the actual true capacity potential (for the overall site) is not used.

Table B-13
HOO Site Densities

Site Zoning	Allowed Density Range	Realistic Capacity Assumed Density
HOO-R-2	30 – 84 du/ac (depending on size)	• Less than 0.50 acre: 70 units per acre • 0.50 to 0.99 acre: 77 units per acre (10% increase) • 1 acre or more: 84 units per acre (20% increase)
HOO-R-3	30 – 84 du/ac (depending on size)	
HOO-R-4	30 – 84 du/ac (depending on size)	
HOO-MX	30 – 84 du/ac (depending on size)	
HOO-M-1	30 – 84 du/ac (depending on size)	

The site inventory assumes that potential development will occur under the HOO, rather than the base zone, due to the generous development standards and strong development track record. As mentioned above, maximum allowable densities (ranging from 77 to 84 du/ac) for the HOO are used to calculate realistic capacity of the sites. The HOO was adopted in 2006, and the maximum density has been increased twice since then and actual development densities have increased proportionally. **Table B-14** shows that all but two projects have achieved densities in excess of what is allowed in the HOO. In comparison, recent residential development in residential (R-3) areas outside the HOO during the same period have been developed at lower densities (**Table B-15**).

California's Density Bonus Law allows developers to increase the density of a property beyond the maximum allowed by a jurisdiction's General Plan. Projects where 100% of units have below market rate rents and located near transit (High Quality Transit Areas or HQTA) may be eligible for unlimited density and reduced or no parking standards. Close to 65% of all HOO sites are located within a HQTA and the potential for unlimited density shows that projects have the

potential for greatly exceeding the maximum density in the HOO. Projects outside of a HQTA overall show slightly lower densities (as a proportion of allowed maximum density) yet still average densities in excess of the maximum allowed densities on the properties. As such, assuming maximum density on identified HOO sites is a reasonable and realistic approach.

State law also requires that for non-residential zoned sites, the capacity methodology accounts for the likelihood of residential development on these sites. Stand-alone, non-residential projects are not allowed in the HOO on the underlying zones for the identified sites. The HOO regulations require that all projects, including mixed-use projects, include housing. And based on development trends in the HOO where no mixed-use projects have been built, the development of housing is a certainty. Suitability of non-vacant sites is discussed earlier in this methodology section.

Table B-14
HOO Projects List

Project Address/ APN	Units	Size	Density (du/ac)	Zoning	Prior Use	Year Approved	Max HOO Density (at approval)	% of Max Density	HQTA	Lot Consolidation
Cornerstone 9541-9581 W Ball Rd 127-284-01	49	1.45	33.79	CN Commercial Neighborhood	Office/Retail Building	2007	25	135%	No	N/A
Avenida Villas 9602-9612 W Ball Rd	29	0.82	35.37	R3	Medical Office Building	2011	43	82%	No	2 parcels, less than half acre in size
Buena Vista 16451 E Buena Vista St	17	0.51	33.33	C2	Vacant	2011	25	133%	No	2 parcels, less than half acre in size
Stonegate I 9051 Katella	38	1.15	33.04	C1	Commercial/Car and RV storage	2009	25	132%	Yes	2 parcels
Stonegate II 8911 Katella	26	0.76	34.21	C1	Commercial/ RV rentals	2009	25	137%	Yes	N/A
Cerritos Family 9501 W Cerritos	60	2.047	29.31	R2 Multifamily Dwellings	Church	2012	43	68%	No	Unknown
Potter's Lane 15171 Jackson	16	0.41	39.02	C2	Single-Family Residential Unit	2017	25	156%	Yes	No
Casa Paloma 15162 Jackson,	71	1.12	63.39	C2	Pottery Manufacturing Facility	2022	25	254%	Yes	No
Jackson Street 15081 Jackson Ave, 15072 Adams, 15082 Adams	65	0.745	87.25	C2	Single family and automotive use	2022	70	125%	Yes	3 parcels, less than half acre in size

Table B-15
Recent Non-HOO Residential (R-3) Project List

Parcel Address	Reporting Year	Units	Acres	Density (du/ac)	Zoning	Max Density Allowed	HOO	HQTA	% of Max Density	Prior Use	Lot Consolidation
14892 Van Buren St Midway City	2021	3	0.18	16.69	R3	43.50	No	Yes	38%	Vacant	No
14621 Adams St, Midway City	2020	4	0.22	18.18	R3	43.50	No	Yes	42%	SFD	No
14881 Newland St Midway City	2020	4	0.18	22.26	R3	43.50	No	Yes	51%	Duplex	No
14682 Adams St Midway City	2020	4	0.4	10.81	R3	43.50	No	Yes	25%	SFR	No
14672 Adams St Midway City	2020	4	0.4	10.81	R3	43.50	No	Yes	25%	SFR	No

Religious Institutions

The site inventory includes several religious institutions sites with excess vacant property or large parking lots which could accommodate residential development. Removal or replacement of church buildings is not assumed. SB 4, effective 2024 stipulates that faith-based organization or nonprofit college maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel. Realistic capacity on the three religious institution sites within the HOO assume maximum density (see section above).

Other: RMV/Coyote Canyon

Realistic capacity on the County-approved Coyote Canyon site is assumed to be about 6 du/ac. This low-density assumption is based on densities for similar projects and in consideration of site characteristics.

Rancho Mission Viejo is a Planned Community in south Orange County originally approved for 14,000 units in 2004. Planning Area 3 of the community is expected to be submitted for approval and is anticipated to accommodate approximately 4,166 units within the 2021-2029 6th Cycle Housing Element Period. When developing the 2021-2029 RHNA Allocation Plan, SCAG utilized Orange County Projections (OCP) 2018 which each local jurisdiction, including the County, participated in its development and provided population, employment, and housing growth data for the current planning period. The forecast data submitted by the County included information provided by Rancho Mission Viejo. Rancho Mission Viejo forecasted that they would construct 4,166 dwelling units by the end of the 2021-2029 Housing Element planning period. These dwelling units were included in the County's forecast of new construction and are reflected in OCP 2018, the dataset used by SCAG to determine the County's RHNA allocation. Full buildout of the 14,000 units in the Rancho Mission Viejo planned community is expected in approximately 25-30 years. Only the 4,166 units included in the SCAG OCP are included in this site inventory.

Densities Appropriate for Accommodating Lower-Income Housing

Affordability is dependent on density allowed, capacity, and size. The capacity of sites that allow development densities of at least 30 units per acre are credited toward the lower-income RHNA, as allowed by State law. The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by State law (at least

30 units per acre for Orange County), HCD is obligated to accept sites with those density standards (30 units per acre or higher) as appropriate for accommodating the jurisdiction's share of regional housing need for lower-income households. Land use designations with density ranges near the default density are considered appropriate to accommodate housing for moderate-income households.

- HOO: All HOO sites (which require inclusion of affordable housing) are included under the sites requiring rezoning and as such must meet the State-designated default density standard (at least 30 du/ac) and meet the shortfall requirement of accommodation at least 16 units to be credited toward the lower-income RHNA. HOO sites under 0.5 acres in size or those sites with a capacity less than the 16 units (shortfall requirement) are credited toward the moderate- and above-moderate-income RHNA shortfall.
- Religious Institutions: The site inventory includes several religious institutions sites with excess vacant property or large parking lots, which could accommodate residential development. SB 4, effective 2024 stipulates that faith-based organization or nonprofit college maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel.

Large and Small Sites

Consistent with updated Housing Element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower-income sites inventory presented in this section is predominately limited to parcels between 0.5 and 10 acres in size, as state law has indicated these size parameters can best accommodate lower-income housing development. The only large sites included have commitments to the development of affordable housing. Sites meeting the default density standard (at least 30 du/ac) but are under 0.5 acres in size are credited toward the moderate-income category as are sites that meet the default density standard and are larger than 0.5 acres but cannot accommodate 16 units as required by the shortfall requirements.

Exclusive of the Rancho Mission Viejo Master Plan area, Coyote Canyon, and religious institution sites, the average site size (which may contain multiple parcels) is 1.7 acres with a median size just under one acre (0.8 acres). In general, small site development is still a realistic approach as the County of Orange has previous recent experience developing affordable housing on sites smaller than half an acre (Potter's Lane). All but one of the nine affordable multifamily

developments in **Table B-14** were developed on sites larger than the inventory average (1.7) and five of those projects on sites that are 0.8 acres or smaller.

- Small Sites: Due to the historical parcelization pattern in the older areas of the Unincorporated County, the inclusion of small sites in the inventory is expected. Nonetheless, to adhere to State law and HCD guidance, there are no stand-alone small sites used to meet the lower-income RHNA. Small parcels are included in the inventory but only as part of a larger, multi-parcel sites. Those sites must meet the 30du/ac default density and the 16-unit capacity requirements for shortfall (rezoning) sites to be credited toward the lower-income RHNA. Small sites (less than 0.5 acres or those sites with a capacity less than the 16 units required by law) are credited toward the moderate- and above-moderate-income RHNA shortfall. In general, small site development is still a realistic approach as the County of Orange has previous recent experience developing affordable housing on sites smaller than half an acre. **Table B-16** shows specific examples of affordable housing developments the County has completed on parcels that are half an acre or less in size.

Table B-16
Affordable Development – Small Site Examples

Project	Location	Parcel Size (ac)	Density (du/ac)	Total Units (by affordability level)
Buena Vista PA 100017	16451 Buena Vista St., Orange	0.5	34	17 Units (6 extremely-low-, 8 very low-, 3 low-)
Potter's Lane PA 150058	15171 Jackson Street, Midway City	0.41	39	16 Units (15 very low 1 above-mod Manager's Unit)
*Note: The County of Orange does not track historic lot consolidations. Many of the HOO fully affordable projects shown in **Table B-3** are the product of a consolidation of small lots as discussed below.*				

- Large Sites: two large sites are included in the inventory and the capacity credited to the lower-income RHNA is limited to units that the property owners have committed to providing.
    - Rancho Mission Viejo Planning Area 3 spans 385 acres and the owners have forecasted that they would construct 4,166 dwelling units by the end of the 2021-2019 Housing Element planning period. As part of a 2016 a General Plan amendment and development agreement, the property owner is required to comply with the Affordable Housing Implementation Agreement (AHIA), which requires inclusion of 165 lower-income units in Planning Area 3Coyote Canyon is a 375-acre former landfill property that is owned by the County of Orange. Only the units that the County has committed to set aside for deed-restricted, affordable housing are assumed to be affordable to lower-income households (see Program 3). The County

has developed a large site similarly in Rancho Mission Viejo within the last planning period, Specifically, Sendero Bluffs and Esencia Norte in Rancho Mission Viejo include a total of 219 lower-income units as well as moderate- and above-moderate-income units. A similar approach is proposed for the Coyote Canyon sites. The County thus has a proven track record of developing lower-income housing on large sites along with other types of housing.

While not falling under the large site size parameters set by State law, the inventory includes three stand-alone sites that are between 4.5 and 7.8 acres in size. Due to the densities on these sites (>30 du/ac) capacity can be credited toward the lower-income RHNA. However, as a more conservative approach, the capacity is split evenly between the lower- and moderate-income category. This approach provides flexibility for the potential development of mixed-income housing.

APPENDIX C: PUBLIC PARTICIPATION SUMMARY

Public participation is an important component of the planning process. 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 Assessment of Fair Housing (AFH). As part of the 6th Cycle Housing Element Update process, the County of Orange has provided residents and other interested parties numerous opportunities for review and comment. These engagement efforts included community workshops and meetings, meetings with Housing Element Resource Team, online and digital outreach, and public hearings. This proactive outreach effort invited broad involvement throughout the analytical and policy development phases of the project.

The following is a list of meetings and hearings held during the Housing Element update process.

February 16, 2021	Community Workshop #1
February 17, 2021	Resource Team #1
September 27, 2021	Community Workshop #2
September 28, 2021	Resource Team #2
October 27, 2021	Planning Commission Study Session
March 14, 2023	Rossmoor Community Services District Meeting
September 5, 2024	Housing Element Update Webinar

Notices of all Housing Element public hearings were published in the local newspaper in advance of each meeting, as well as posting the notices on the County's website:

https://ocds.ocpublicworks.com/. The draft Housing Element was made available for review at County offices and posted on the website.

For the 2021-2029 Housing Element Update, OC Development Services conducted the following:

- Sent invitations to all of the advisory and non-advisory committees within the County of Orange (North Tustin Planning Advisory Committee, Coto de Caza Planning Advisory Committee, Orange Park Acres, Foothill Trabuco Specific Plan Review Board, Rossmoor Homeowners Association, etc.) for the Community Workshops.
- Requested that Kennedy Commission, Abrazar and La Colonia Independencia community centers send an email notice about the Community Workshops to those on their mailing list.

On August 26, 2024, the County released an updated Draft Housing Element with changes that address findings received in September 2023 from the California Department of Housing and Community Development (HCD). Community members, agencies, and organizations were invited to comment on the Draft Housing Element during a 15-day public review period (from August 26 to September 9, 2024). The community was notified of the opportunity to comment on the Draft through posts on the County's dedicated Housing Element webpage and via social media (Facebook, Twitter, and Instagram). Direct email invitations were sent to community members or organizations that have asked to be notified or that have previously provided feedback in addition to the Planning Commission and Board of Supervisors offices and all County advisory committees. On September 5, 2024, a webinar was hosted to provide background information on the Housing Element update process, share the latest edits to the County's 2021-2029 Housing Element, and to answer questions or obtain feedback. A recording of the webinar was also posted on the County's Housing Element webpage. One letter of support was received during this time.

On November 12, 2024, the County released an updated Draft Housing Element with changes that address feedback received from HCD on the September 2024 draft through phone calls and emails. As with previous drafts, the community was notified of the opportunity to comment on the Draft through posts on the County's dedicated Housing Element webpage and via social media (Facebook, Twitter, and Instagram). Direct email invitations were sent to community members or organizations that have asked to be notified or that have previously provided feedback in addition to the Planning Commission and Board of Supervisors offices and all County advisory committees.

A community survey was also circulated to various agencies and groups and translated in Spanish and Vietnamese. Oral translation services were also available upon request. Links to the community survey were posted on the County's social media outlets. The survey generated 249 responses, and the results were as follows:

- The community was able to select 3 areas where they envisioned growth. 74 responses went to Ladera Ranch, 69 responses went to Rancho Mission Viejo, 62 responses to Foothill/Trabuco, 61 responses to Midway City, 59 responses to Silverado-Modjeska, and 56 responses towards North Tustin.
- The community was then asked to select 3 areas for where they want to see more housing. 165 responses went to areas in older shopping centers, and 140 responses supported areas near transit.
- When asked what type of housing was most needed, 109 responses were for single-family detached homes, 98 for senior housing, and 81 for multifamily housing.

- The community was asked to select 3 housing-related concerns. 103 responses were related to low inventory of available housing, 95 responses were for lack of available sites, and 91 responses were for lack of affordable housing.
- There were 80 write-in comments, which included a need for more affordable housing, density (for and against), maintaining existing neighborhoods, opposing ADUs in single family neighborhoods, opposing development in high fire areas (i.e., canyons), higher density near transit, along with some concerns related to homelessness, and traffic.

Each draft of the Housing Element Update was made available for public review and comment on the County's website. Notification of availability was emailed to the Housing Element email distribution list. Comments were reviewed and addressed prior to submittal to State HCD.

Table C-1 provides a summary of public comments and how those comments have been addressed in this Housing Element.

Figures C-1 to C-3 provide the letters of support received for the County of Orange 2021-2029 Housing Element.

Table C-1
Summary of Public Comments

Comment	Response
What is the County doing to reach out to the community?	County staff, in collaboration with the consultant, hosted community workshops to discuss the Housing Element Update in February and September 2021. In particular, invitations were circulated to advisory and non-advisory committees (North Tustin Planning Advisory Committee, Coto de Caza Planning Advisory Committee, Orange Park Acres, Foothill Trabuco Specific Plan Review Board, Rossmoor Homeowners Association, etc.); advocacy groups; community centers; and posted on the County's Social Media Outlets. The Housing Element Community Survey and Flyers were translated to Spanish and Vietnamese. Oral translation services were also available upon request.
The County needs more affordable housing.	The County recognizes the need for affordable housing, housing for homeless and special needs, and housing for all income levels. OC Public Works has been collaborating with our housing partners at OC Community Resources on various affordable housing developments within Unincorporated Orange County. In particular, the County's Housing Opportunities Overlay has led to the development of eight (8) affordable housing projects since 2006.
What sort of strategies are being incorporated into the County's Housing Element?	To encourage and facilitate the development of Accessory Dwelling Units (ADUs), County staff posted an ADU Flyer on our website, and released a Request for Proposal (RFP) to select a consultant to prepare pre-approved ADU plans. In 2018, the County issued permits for 23 ADUs, followed by 21 ADUs in 2019, 51 ADUs in 2020, 57 ADUs in 2021, and 64 ADUs in 2022. Since 2018, the County has seen a 178% increase in the number of issued permits for ADUs. This trend reflects a continued increase in ADU activity. As for other innovative strategies, the County provided financing and entitlements for Potter's Lane, a 16-unit shipping container development in Midway City. In order to address the number of very low- and low-income RHNA units, the Board of Supervisors adopted an amendment to the Housing Opportunities Overlay Zone regulations to

Table C-1
Summary of Public Comments

Comment	Response
	increase density from 43 to 70 units per acre for sites located within the County's Housing Opportunities Overlay, excluding any applicable density bonus.
How were the Housing Element sites selected?	In general, the land inventory is a listing of candidate sites for development. A developer would have to submit a proposed application for the site to make the development come to fruition, and market conditions would dictate the type of housing to be built and population to be served. Characteristics that have been taken into consideration when evaluating the appropriateness of sites include physical features (e.g., size and shape of the site) and location (e.g., proximity and access to infrastructure, transit, job centers, etc.). As an example, the candidate sites within the Housing Opportunities Overlay are also near public transit and other amenities, particularly within Unincorporated Anaheim, Unincorporated Stanton, and Midway City. In particular, since the County's Housing Opportunities Overlay successfully led to the development of multiple affordable housing developments, County staff is anticipating approximately 4,384 units within the Overlay for this upcoming 6th Cycle Housing Element. Also, Rancho Mission Viejo encompasses a large portion of Unincorporated Orange County, so the land inventory reflects 4,166 total units within Rancho Mission Viejo for this upcoming 6th Cycle Housing Element. The County's area is decreasing as a result of annexations, thus smaller sites that may be merged and consolidated have also been incorporated into the land inventory. As an example, Potter's Lane was located on a site less than 1 acre.
Do short-term rentals have an impact on the County's Housing Element?	The County adopted short-term regulations within the Comprehensive Zoning Code Update, which was adopted in July 2020, as a result of the proliferation of short-term rentals in Unincorporated Orange County. From July 2020 through June 30, 2023, 76 short-term rental permits have been approved, Based on the number of STRs that we are aware of, there would be a minimal impact in the housing inventory.
Was consideration given to the walkability of jobs and services in the non-residential areas of Rossmoor from nearby residential areas? This is the only remaining commercial area surrounded by residential uses in Rossmoor.	In general, the candidate sites are identified in the inventory as they have potential for residential development; however, the market conditions would dictate whether development comes to fruition. Developments within the County's Housing Opportunities Overlay could either be residential or commercial. The surrounding uses around the Rossmoor commercial center were considered, and the sites were selected due to factors such as lot size. Walkability was considered when selecting candidate sites, and the County has taken into consideration surrounding uses and their proximity to transit and amenities.
The community requested that a Silverado-Modjeska site be removed due to potential concerns related to flood, fire, lack of access to amenities, septic regulations, etc.	After careful consideration of the public comments, the proposed Silverado site (Assessor Parcel Number 876-034-04) has been removed from the Draft Housing Element; however, based on upcoming feedback from State HCD, County staff may be required to reassess all sites, including those that have been removed.
Candidate sites located within the County's Draft Housing Element have also been identified in other jurisdiction's Draft Housing Elements.	In general, jurisdictions usually identify sites that are within their jurisdictional boundaries; however, Housing Element Law does allow jurisdictions to identify sites within their sphere of influence.
Some of the candidate sites within the County's Draft Housing Element are located	The Housing Element itself serves as a planning document, which provides candidate sites that are appropriately zoned to meet the County's RHNA at all income levels.

Table C-1
Summary of Public Comments

Comment	Response
in close proximity to John Wayne Airport (JWA), thus within JWA Safety Zones, Noise Contours and Part 77 Obstruction Surface Areas, and Notification Areas.	Environmental concerns, such as safety are addressed in the Draft Housing Element. The Airport Land Use Commission (ALUC) found the County's Draft Housing Element Update consistent with the existing Airport Environs Land Use Plan (AELUP) for JWA on January 11, 2022. Any proposed projects within the JWA AELUP would be subject to review by ALUC to determine whether they are consistent with the AELUP If/when a developer proposes an application on one of the candidate sites, additional environmental analysis for noise and safety would be conducted at that time.
Banning Ranch, a vacant site located on the north side of Pacific Coast Highway, was identified in the County's 5th Cycle Housing Element as a site to accommodate future housing needs and identified in the Housing Element Update. There have been comments supporting the inclusion of Banning Ranch in the County's Land Inventory and comments requesting its exclusion. Banning Ranch offers the potential for 1,475 units towards meeting the RHNA.	After careful consideration of the following: (1) recent efforts to conserve Banning Ranch as open space, including a private grant of $50 million, the California Department of Fish and Wildlife's announcement of a $8 million grant, and the United States Fish and Wildlife Service's announcement of a $11 million grant all to support the purchase of Banning Ranch by the Trust for Public Land, which recently entered into an exclusive agreement with the property owner to purchase the property; (2) past efforts to develop areas of Banning Ranch have been unsuccessful due to non-compliance with the California Environmental Quality Act (See e.g. Banning Ranch Conservancy v. City of Newport Beach, 2 Cal.5th 918 (2017), making the area challenging and costly to develop; and (3) Banning Ranch contains wildlife habitat that hosts endangered or threatened species and is designated for special protection under the Coastal Act, the Banning Ranch area is not reflected in the County's Draft Housing Element Update.
The County issued permits for a limited number of affordable housing units during the 5th Cycle Housing Element. Suggest using County-owned sites and adopting an inclusionary housing policy to encourage the development of affordable housing.	Though potential housing opportunity sites are identified in the Housing Element, market conditions dictate whether housing will be built, the type of housing, and the actual income limits for that unit. The County has been successful in utilizing County-owned properties for affordable housing developments, as exemplified by the Crossroads at Washington project in the City of Santa Ana, and the Placentia Veteran's Village project in the City of Placentia and will continue to collaborate with CEO Real Estate on future affordable housing opportunities. Staff will continue to explore other innovative strategies to encourage affordable housing development, such as inclusionary housing.
Hills for Everyone requested that the Unincorporated Area: City of Brea (Aera Parcels) sites either be eliminated from consideration, or the number of units identified be revised.	After careful consideration of the comment letter received, the proposed 1,857 units from the Unincorporated Area: City of Brea (Aera Parcels) was removed from the Land Inventory.
Hills for Everyone supports the modification of the document that specifically excludes the "Brea Canyon Parcels" (Aera Energy) property from the Housing Element Site Inventory. With this modification, Hills for Everyone supports the proposed Housing Element Update as revised.	No response or changes necessary.

Figure C-1
Letter of Support – C&C Development

C&C Development

Megan Kirkeby, Deputy Director
Housing Policy Development
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

RE: County of Orange Housing Opportunities Overlay Zone

Dear Ms. Kirkeby,

It is my pleasure to write a letter of support for the County of Orange Housing Opportunities Overlay Zone adopted by the Board of Supervisors in 2006. Through this innovative program, over 100 rental units reserved exclusively for lower-income families have been built in the unincorporated area.

Our organization C&C Development Co., LLC built the Buena Vista Apartments in the Orange area in 2009. Taking advantage of the County's Housing Opportunities Overlay Zone for Affordable Housing.

My organization fully supports the efforts of the County of Orange to provide as many viable sites as possible for the future development of much needed affordable housing in Orange County.

Sincerely,

Todd Cottle

Owner

C&C Development Co., LLC

Figure C-2
Letter of Support – American Family Housing



American Family Housing

Welcome Home

February 7, 2022

Megan Kirkeby, Deputy Director
Housing Policy Development
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

Dear Deputy Kirkeby,

It is my pleasure to write a letter of support for the County of Orange Housing Opportunities Overlay Zone adopted by the Board of Supervisors in 2006. Through this innovative program, over 100 rental units reserved exclusively for lower-income families have been built in the unincorporated area.

My organization fully supports the efforts of the County of Orange to provide as many viable sites as possible for the future development of much needed affordable housing in Orange County. As a nonprofit developer, American Family Housing has made use of the County's Housing Opportunities Overlay Zone regulations in support of helping the County of Orange address its regional housing needs.

Our organization built Potters Lane (16 units deed restricted as affordable), which opened in 2017. We are also set to achieve certificates of occupancy in June 2022 at Casa Paloma (71 units, of which 48 would be deed restricted as affordable). The County's Overlay Zone is critical to enabling the County to achieve its goals by making available parcels that were previously not available for residential development.

We appreciate the excellent working relationships that County staff has with housing developers, including American Family Housing, and would like to submit a letter of support for the County's Housing Opportunities Overlay Zone to the California Department of Housing and Community Development (HCD).

Sincerely and with appreciation,

Milo Peinemann
Chief Executive Officer

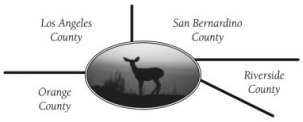
www.AFHusa.org

O 714.897.3221 · F 714.893.6858
15161 Jackson Street, Midway City, CA 92655

Figure C-3
Letter of Support – Hills for Everyone

Hills For Everyone

Southern California comes together at the Puente-Chino Hills



September 2, 2024

Comments Submitted via Email to: OCHousing@ocpw.ocgov.com

Justin Kirk, Deputy Director
Development Services Department
County of Orange
601 N. Ross St.
Santa Ana, CA 92701

RE: Housing Element Update (Public Review Version, August 2024)

Dear Deputy Director Kirk,

Hills For Everyone writes these comments as a follow up to our letter submitted on September 28, 2023. We are in receipt of the Housing Element Update (Public Review Version, August 2024) and have reviewed the relevant sections.

We support the modification of the document that specifically excludes the "Brea Canyon Parcels" (Aera Energy) property from the Housing Element Site Inventory.

With this modification, Hills For Everyone supports the proposed Housing Element Update as revised. Should you have any questions, please reach out to me (714) 996-1572.

Sincerely,

Claire Schlotterbeck

Claire Schlotterbeck
Executive Director

P.O. Box 9835 • Brea, CA 92822-1835 • www.HillsForEveryone.org



OC Public Works
OC Public Works | Development Services
601 N. Ross Street, Santa Ana, CA 92701

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

September 28, 2023

Justin Kirk, Deputy Director
Development Services Department
County of Orange
601 N. Ross St.
Santa Ana, CA 92701

Dear Justin Kirk:

RE: County of Orange's 6th Cycle (2021-2029) Revised Draft Housing Element

Thank you for submitting the County of Orange's (County) revised draft housing element received for review on July 31, 2023. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Elizabeth Hansburg of People for Housing OC pursuant to Government Code section 65585, subdivision (c).

The revised draft element addresses many statutory requirements described in HCD's February 7, 2023 review; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

Public participation in the development, adoption, and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the County should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent

Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the County will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the County to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the hard work and the County's planning staff provided during the update and review. We are committed to assisting the County in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Reid Miller, of our staff, at Reid.Miller@hcd.ca.gov.

Sincerely,



Melinda Coy
Senior Program Manager

Enclosure

APPENDIX
COUNTY OF ORANGE

The following changes are necessary to bring the County's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at https://www.hcd.ca.gov/planning-and-community-development/hcd-memos. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks and includes the Government Code addressing State Housing Element Law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A))*

   Integration and Segregation: While the element was revised to include adequate analysis of integration and segregation based on race and ethnicity, it must still be revised to provide the same analysis for patterns of integration and segregation based on disability, familial status, and income. As noted in HCD's February 7, 2022 review this analysis must include complete local and regional data on integration and segregation for the unincorporated County and analyze it for both local and regional trends and patterns over time.

   Disproportionate Housing Needs: While the element was revised to provide further data on overcrowding, cost burden, housing conditions, and homelessness and provides some general analysis, it must still analyze the data for trends and geographical patterns over time both locally and regionally and provide additional analysis as to the potential causes of these patterns and trends.

   Local Data and Knowledge: While the element was revised to include some additional local data for disproportionate housing needs, it largely was not revised to meet this requirement. As stated in HCD's December 27, 2021 review, the element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.

   Identified Sites and Affirmatively Furthering Fair Housing (AFFH): While the element was revised to provide an analysis of sites in relation race and ethnicity and income, it must provide the same analysis for disability, familial status. In addition, the element

also requires an analysis of the placement of sites in relation to disproportionate housing needs and access to opportunity. The element should discuss whether the distribution of sites improves or exacerbates existing conditions, and if sites do exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

2. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   Sites Inventory: While the element was revised to provide an estimate of potential development by income on a per parcel basis, there continues to be inconsistencies with a number of tables (e.g., Figures B-13, B-14, and B-20) where the proposed total is inconsistent with the actual sum of the individual unit or acreage subtotals. The County should reevaluate all sites inventory tables to ensure consistency and be sure to include an estimate of size and capacity for each parcel.

   Realistic Capacity: While the element was revised to provide examples of recent development using the Housing Opportunity Overlay (HOO) in Table B-2, it appears all the example sites develop at densities consistently lower that the 70 dwelling units per acre the County is assuming (the maximum density the HOO allows). In order to assume this density and apply it to sites in the inventory; the element must provide evidence of specific trends; patterns or other evidence that led to and justify these assumptions. Additionally, the capacity methodology must account for development standards or other factors that could limit the capacity.

   Suitability of Nonvacant Sites: The element was not revised to meet this requirement. As stated in HCD's February 7, 2022 and December 27, 2021 reviews, trends and analysis need to support the redevelopment potential of identified sites, and the analysis must demonstrate that the existing uses do not pose and impediment to new housing development within the planning period. The element should use development and market trends in the County and surrounding region, and specifically connect the characteristics of those trends of development to sites in the inventory.

   Large Sites: The element did not address this finding, as it does not provide information indicating sites of equivalent size and affordability to those large sites included in the inventory were successfully developed during the prior planning period. Please see HCD's February 7, 2023 review, with particular attention to the suggested framework of analysis for large sites in specific plan areas.

   Small Sites: The element was not revised to meet this requirement. Please see HCD's February 7, 2023 review for an outline of the required analysis.

   Accessory Dwelling Units (ADUs): While Program 6 (Accessory Dwelling Units) was revised to commit to establishing an ADU monitoring program sooner in the planning period with more frequent monitoring, the element's ADU projections were not revised as requested in HCD's February 7, 2023 review, nor has adequate additional analysis

or support for these projections been included. the element should be revised to reduce the number of ADUs to accommodate the County's Regional Housing Needs Allocation (RHNA).

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the County must submit an electronic sites inventory with its adopted housing element. The County must utilize standards, forms, and definitions adopted by HCD.

3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). (Gov. Code, § 65583, subd. (a)(5).)*

   Local Processing and Permit Procedures: While the element has been revised to provide a general analysis of the approval process and procedures, it must still include typical findings for each type of permit, as well as any discretionary approval procedures and findings for single-family and multifamily development. Programs to address potential constraints may need to be revised based on this completed analysis.

   Constraints on Housing for Persons with Disabilities: While the element has been revised to address how non-licensed group home facilities that serve seven or more residences is permitted, its conclusion that requiring a use permit for group homes with seven or more residents is not a constraint because no group home facilities of seven or more have been denied thorough the use permit process is erroneous. As stated in HCD's February 7, 2023 review, Zoning and standards should simply implement a barrier-free definition of family instead of subjecting, potentially persons with disabilities, to special regulations. Zoning code regulations that isolate and regulate various types of housing for persons with disabilities based on the number of people and other factors pose a constraint on housing choice for persons with disabilities, and program actions should be added to the element to remove this use permit requirement.

4. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section*

65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)

While the element has been revised to provide and analysis of a number of factors that play a role in the length of time between receiving approval for a housing development and submittal of an application for building permits, it must provide a specific time frame for both single and multifamily developments.

B. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

   While the element revised a number of programs and added additional actions based on newly provided data and analysis, it largely was not revised to meet the requirements of this finding. Please see HCD's February 7, 2023 review.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.*
   *(*Gov. Code, § *65583, subd. (c)(1).)*

   As noted in Finding A2, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

   Program 1 (Provide Adequate Sites and Monitor for No Net Loss): While HCD understands the County adopted new zoning to meet some requirements in Program 1 to increase

allowed density in the HOO, it must provide information that those rezonings meet the requirements in Government Code section 65583.2, sub. (h) and (i). Specifically, information is necessary to determine compliance with the following provisions:

- permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval.
- accommodate a minimum of 16 units per site;
- require a minimum density of 20 units per acre; and
- at least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all the very low and low-income housing need, if those sites:
    - allow 100 percent residential use, and
    - require residential use occupy 50 percent of the total floor area of a mixed-use project.

In addition, please be aware, the recent California appellate decision in *Martinez v. City of Clovis*[1] found that while overlays can be used in a rezone, when the base zone allows residential development, both the base zone and the overlay zone must comply with the minimum density requirements of Government Code section 65583.2, subdivision (h). The County should analyze how this decision may impact its current rezone strategy using the HOO and may need to adjust accordingly.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

   As noted in Findings A3 and A4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints.

4. Promote and AFFH opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)

   As noted in Finding A1, the element requires a complete AFFH analysis. The element must be revised to add goals and actions based on the outcomes of a complete analysis.

[1] *Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193, 307 Cal.Rptr.3d 64

NOTICE OF INTENT TO ADOPT NEGATIVE DECLARATION

In compliance with section 15072 of the California Environmental Quality Act (CEQA) Guidelines and the County of Orange Procedures, notification is hereby given to responsible agencies, trustee agencies, interest groups and the general public, that the County of Orange **shall adopt Negative Declaration (ND) File Numbers Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01.**

PUBLIC REVIEW: The proposed ND is being circulated for public review from July 12, 2022 to August 10, 2022 to comply with the required minimum 30-day public review period. The ND may be adopted by the County of Orange and become final unless written comments on its appropriateness or adequacy are received by the office listed below **by 5:00 p.m. on the ending date of the public review period (August 10, 2022).**

CONTACT PERSON: Kevin Shannon **PHONE:** (714) 667-1632
Kevin.Shannon@ocpw.ocgov.com

PUBLIC MEETING(S)/HEARINGS ON PROJECT:
The proposed project will be reviewed for approval by the decision-maker listed below.

DECISION MAKING BODY: Orange County Planning Commission

DATE: To Be Determined **TIME:** 1:30 PM or soon thereafter

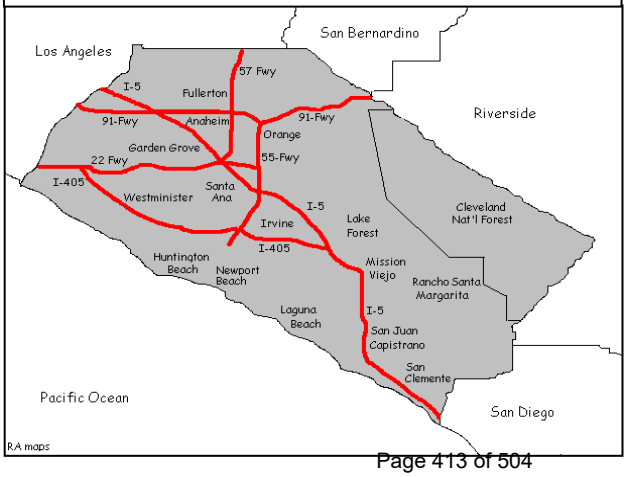
LOCATION OF PUBLIC MEETING/HEARING: See location map below.

The ND and any supporting attachments are available for review during normal business hours at the offices of the OC Public Works, OC Development Services/Planning, 601 North Ross Street, Santa Ana, CA 92701 and also available at the following website: https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2

Public Hearing Location - County of Orange
Hall of Administration – 333 W. Santa Ana Blvd, Santa Ana 92702
Board of Supervisors Hearing Room



Project Location – Unincorporated Portions of County



DATE POSTED: July 11, 2022

NEGATIVE DECLARATION
OC PUBLIC WORKS
601 NORTH ROSS STREET
P. O. BOX 4048
SANTA ANA, CALIFORNIA 92701

In accordance with Orange County Board of Supervisor's policies regarding implementation of the California Environmental Quality Act, the County of Orange has conducted an Initial Study to determine whether the following project may have a significant adverse effect on the environment. On the basis of that study, the County of Orange hereby finds that the proposed project will not have a significant adverse effect on the environment and does not require the preparation of an Environmental Impact Report because either the proposed project:

☒ **has** or **creates no** significant environmental impacts requiring mitigation; or

☐ **will not create** a significant adverse effect, because the Mitigation Measures described in the Initial Study have been added to the project.

The environmental documents, which constitute the Initial Study and supporting technical studies provide the basis and reasons for this determination are available on the website and hereby made a part of this document.

PROJECT:

Title: Housing-Related Updates to the County of Orange General Plan and Comprehensive Zoning Code

Location: Unincorporated portions of Orange County, CA

Description: In accordance with State law, the County is required to update its Housing Element every eight years, which includes an amendment to the Land Use Element and the Safety Element. An Environmental Justice Element is also required to be created when two or more existing General Plan elements are concurrently revised after January 2018. The Zoning Code requires revisions to the existing Housing Opportunities Overlay to maintain consistency with programs included Housing Element Update.

Project Proponent or Applicant: County of Orange, OC Public Works, Development Services/Planning

Department Responsible for Proposed Project: OC Public Works, Development Services/Planning

Address: 601 North Ross Street, Santa Ana, CA 92701

Project Contact Person: Kevin Shannon, Consultant - Env. Planner **Telephone:** (714) 667-1632

CEQA Contact Person: Kevin Shannon, Consultant - Env. Planner **Telephone:** (714) 667-1632

NOTICE: The Negative Declaration shall become final unless written comments are received by the office listed above by **5:00 p.m. on August 10, 2022.** If you wish to provide comments on the appropriateness or adequacy of this document, address your written comments to our finding that the project will not have a significant adverse effect on the environment: (1) identify the environmental effect(s), why they would occur, and why they would be significant, and (2) suggest any mitigation measures which you believe would eliminate or reduce the effect to an acceptable level. Regarding item (1) above, explain the basis for your comments and submit any supporting data or references.

Dated: August 11, 2022 Signed: Kevin Shannon

NOTE: This document and supporting attachments are provided to the general public for review. This is an information document about environmental effects only. Supplemental information is on file and may be reviewed in the office listed above. The decision-making body will review this document and potentially many other sources of information before considering the proposed project.

Public Review Draft
CEQA INITIAL STUDY
NEGATIVE DECLARATION

FOR
HOUSING-RELATED UPDATES TO THE COUNTY OF ORANGE GENERAL PLAN AND COMPREHENSIVE ZONING CODE

Housing Element Update HE 20-01
Safety Element Update SE 19-01
Land Use Element Update LUE 22-01
Environmental Justice Element EJ 22-01
Zoning Code Amendment CA 22-01

Prepared for:

Orange County Planning Commission
and
Orange County Board of Supervisors

Prepared by:

County of Orange
OC Public Works, Development Services/Planning
601 North Ross Street
Santa Ana, CA 92701

July 2022

Table of Contents

Section 1: Introduction 1
1.1 Project Title 1
1.2 Project Purpose 1
1.3 Lead Agency/Project Sponsor Name and Address 1
1.4 Intended Uses of Initial Study/Negative Declaration 1
1.5 Project Location 2
1.6 Native American Consultation 4
1.7 Scope of Environmental Analysis 4
1.8 Environmental Baseline 5
1.9 Environmental Determination 6
Section 2: Project Description 7
2.1 Project Background 7
2.2 Project Location and Environmental Setting 7
2.3 Project Characteristics 7
2.4 Project Approvals 11
Section 3: Environmental Evaluation 12
3.1 Aesthetics 12
3.2 Agriculture and Forestry Resources 14
3.3 Air Quality 16
3.4 Biological Resources 18
3.5 Cultural Resources 20
3.6 Energy 22
3.7 Geology and Soils 23
3.8 Greenhouse Gas Emissions 25
3.9 Hazards and Hazardous Materials 27
3.10 Hydrology and Water Quality 29
3.11 Land Use and Planning 32
3.12 Mineral Resources 34
3.13 Noise 35
3.14 Population and Housing 37
3.15 Public Services 39
3.16 Recreation 41
3.17 Transportation/Traffic 43
3.18 Tribal Cultural Resources 45
3.19 Utilities and Service Systems 47
3.20 Wildfire 49
3.21 Mandatory Findings of Significance 51
Section 4: List of Preparers 53

List of Figures

Figure 1: Regional Project Location 2
Figure 2: Orange County Unincorporated Areas 3

List of Tables

Table 1: Environmental Determination 6
Table 2: Public Agency Approvals 11
Table 3: List of Preparers 53

Section 1: Introduction

1.1 Project Title

Housing-Related Amendments to the County of Orange General Plan and Comprehensive Zoning Code

1.2 Project Purpose

This document is an Initial Study/Negative Declaration (IS/ND) for evaluation of potential environmental impacts per the requirements of the California Environmental Quality Act resulting from implementation of the Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01. For purposes of this document, the proposed project will be referred to as the Project or proposed Project.

1.3 Lead Agency/Project Sponsor Name and Address

County of Orange
OC Public Works, Development Services/Planning
601 North Ross Street
Santa Ana, California 92701

Contact Person and Telephone Number:
Cindy Salazar, Advance Planning Manager
OC Development Services/Planning
Telephone: 714.667.8870

1.4 Intended Uses of Initial Study/Negative Declaration

The County of Orange is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for carrying out or approving a Project which may have significant effects upon the environment.

This IS/ND is an informational document which is intended to inform the County of Orange decision-makers, other responsible or interested agencies, and the general public of the potential environmental effects of the proposed Project. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible agencies must balance adverse environmental effects against other public objectives, including economic and social goals (CEQA Guidelines Section 15021).

Public Resources Code Section 21080(c)(1) and implementing Guidelines Section 15070(a) states a Negative Declaration can be adopted if it can be determined that the Project will not have a significant effect on the environment. Based on this, the County of Orange, as Lead Agency, has determined that environmental clearance for the proposed Project can be provided with a Negative Declaration.

This IS/ND was prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 *et seq.*); the Guidelines for Implementation of the California Environmental Quality Act (Guidelines), as amended (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000, *et seq.*); and the County of Orange 2020 Local CEQA Procedures Manual.

This IS/ND may be inspected from July 12, 2022 through August 10, 2022, Monday through Friday during regular business hours, at OC Development Services/Planning in the County Administrative South Building, 601 North Ross Street, Santa Ana, CA 92701. In addition, this IS/ND is available on the County's website at the following link: https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2

1.5 Project Location

The Project location includes the unincorporated portion of Orange County. Orange County is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles. Refer to Figure 1 - Regional Location and Figure 2 - Orange County Unincorporated Areas.

Figure 1: Regional Project Location

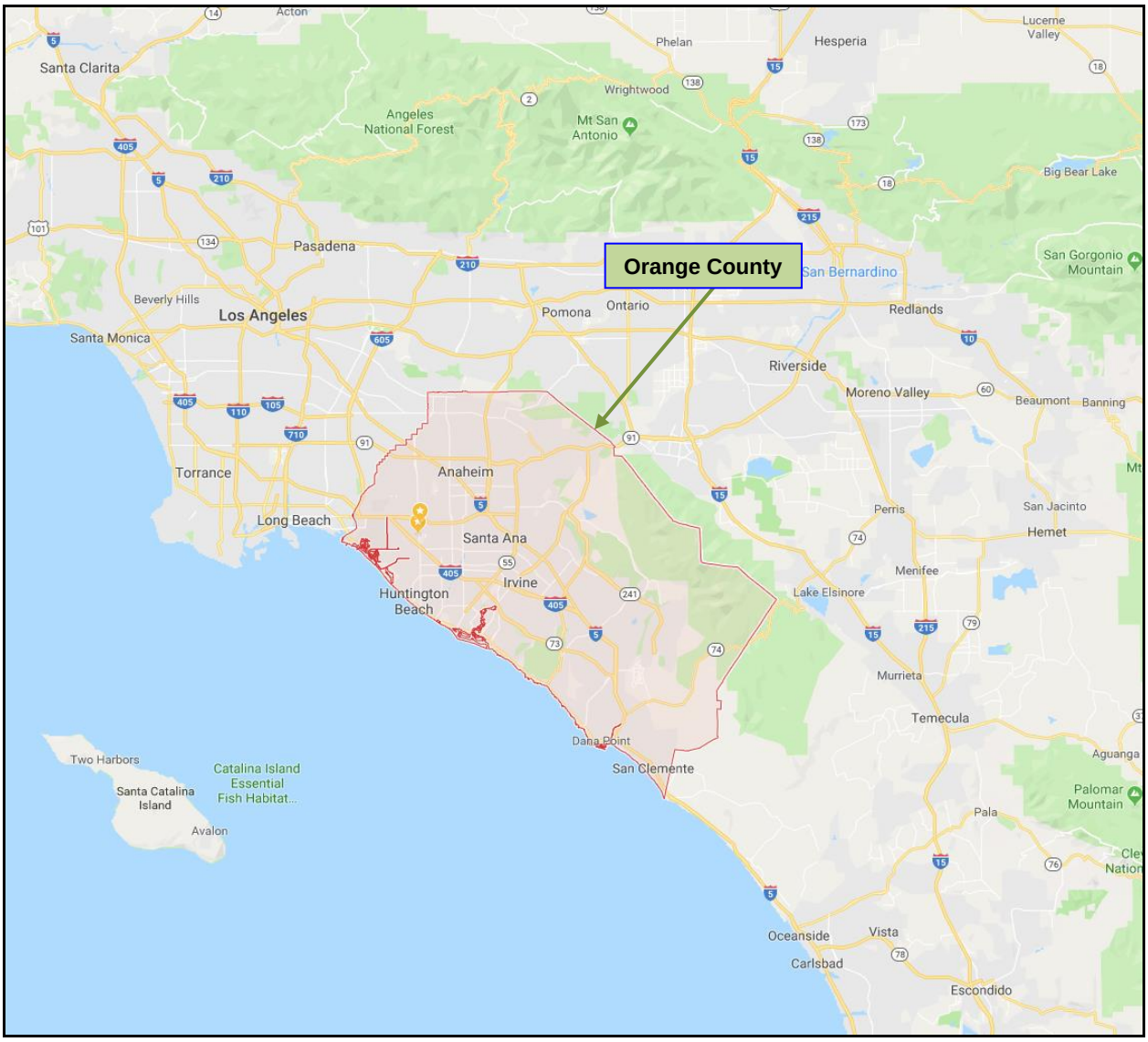
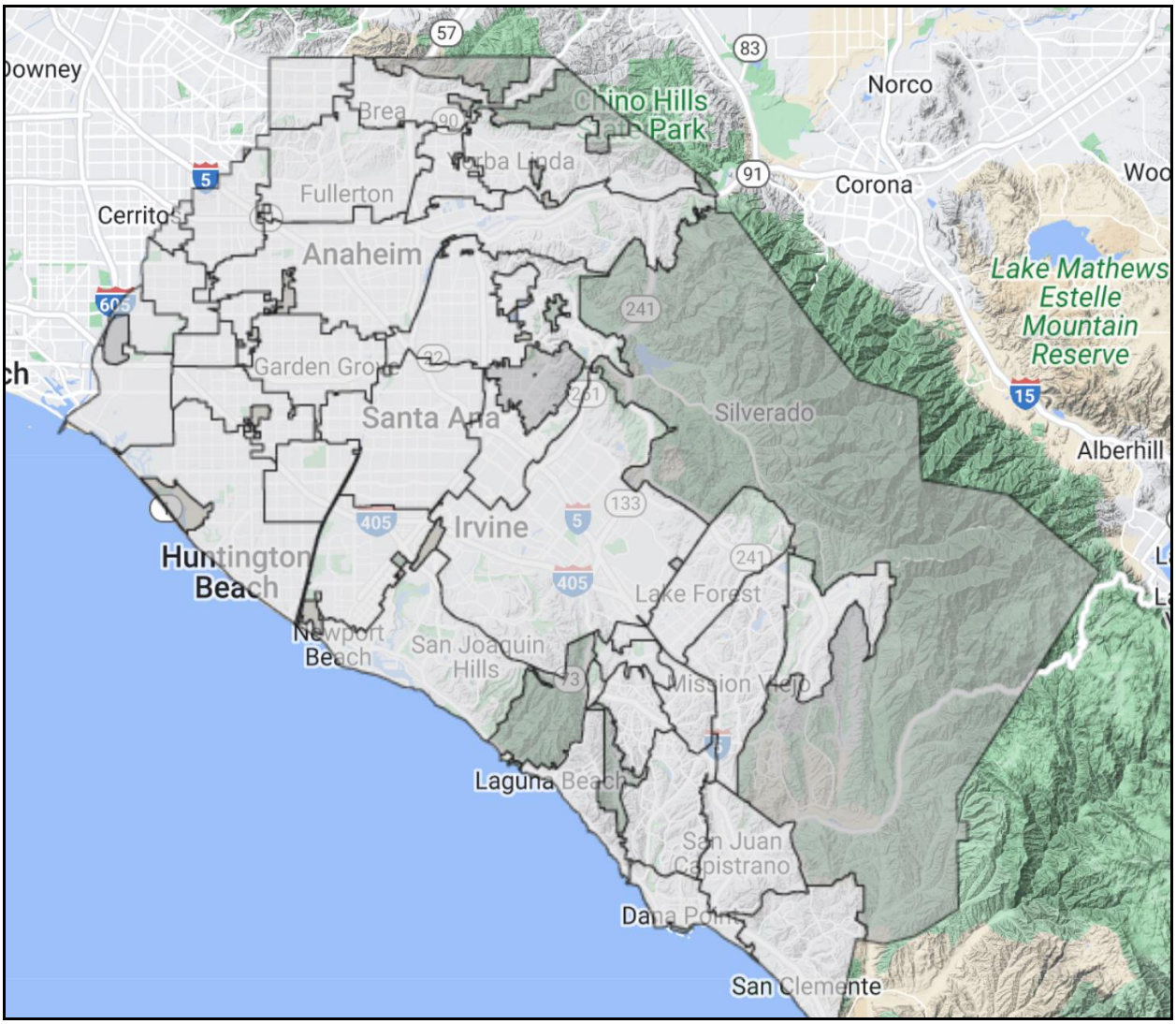


Figure 2: Orange County Unincorporated Areas



1.6 Native American Consultation

California Native American tribes traditionally and culturally affiliated with the Project area are required to be consulted pursuant to PRC Section 21080.3.1. OC Development Services/Planning sent via US Certified Mail AB 52 Initial Consultation letters AB 52 letters pertaining to the Housing Element and Safety Element on August 11, 2021, to the Kizh Nation, Gabrieleño Tongva San Gabriel Band of Mission Indians, Juaneno Band of Mission Indians, and the Soboba Band of Luiseno Indians. OC Development Services/Planning did not receive any requests for consultation.

1.7 Scope of Environmental Analysis

For evaluation of environmental impacts, each sample question from the Environmental Checklist Form contained in Appendix G of the CEQA Guidelines is stated and responses are provided according to the analysis undertaken as part of the IS/ND.

1.7.1 Thresholds of Significance

On November 17, 2020, the County adopted "Guidelines for Evaluating Vehicle Miles Traveled under CEQA" (VMT Guidelines), included as Appendix C in the County of Orange 2020 Local CEQA Procedures Manual. The VMT Guidelines included CEQA threshold thresholds of significance for vehicle miles traveled (VMT). Other than the VMT thresholds, the County has not adopted specific thresholds of significance and rather relies upon the specific questions relating to the topical environmental factors listed in Appendix G to the CEQA Guidelines to assist in the determination of whether an identified impact is potentially significant. The County may, depending on the circumstances of a particular project, use specific thresholds of significance on a case-by-case basis as provided by CEQA Guidelines Section 15064.7(b).

1.7.2 Impact Evaluation Methodology

The environmental impact methodology is described below.

Changes Not Evaluated

Construction Impacts – The Project does not authorize development or require physical changes to any existing development or infrastructure that would generate construction-related impacts. Therefore, they are excluded from the environmental analysis.

Indirect Impacts – The CEQA Guidelines require evaluation of indirect or secondary impacts to the environment which are caused by a project and are later in time and farther removed in distance, but are still reasonably foreseeable. Because these impact types must be related to a physical change in the environment and the Project has none, they are excluded from the environmental analysis. Any proposed developments would be individually reviewed to determine if they are exempt from the provisions of CEQA or require environmental review to determine the appropriate level of CEQA review.

Offsite Features – The Guidelines require evaluation of off-site features that are necessary to implement a project, which are typically associated with infrastructure or other physical improvements. Because the Project does not authorize development or require physical changes to any existing development or infrastructure, no offsite features would be required and the need to analyze impacts associated with offsite features would not occur. Therefore, they are excluded from the environmental analysis.

Changes Evaluated
Each of the topical environmental issues within each of the topical environmental factors evaluates the potential direct physical impacts to the environmental resources that has the potential to occur Project approval. The following topical environmental factors are evaluated in Section 3 - Environmental Evaluation. The numbers in parentheses represent the section numbers.

- Aesthetics (3.1)
- Agriculture & Forestry Resources (3.2)
- Air Quality (3.3)
- Biological Resources (3.4)
- Cultural Resources/Scientific Resources (3.5)
- Energy (3.6)
- Geology and Soils (3.7)
- Greenhouse Gas Emissions (3.8)
- Hazards & Hazardous Materials (3.9)
- Hydrology & Water Quality (3.10)
- Land Use & Planning (3.11)
- Mineral Resources (3.12)
- Noise (3.13)
- Population & Housing (3.14)
- Public Services (3.15)
- Recreation (3.16)
- Transportation/Traffic (3.17)
- Tribal Cultural Resources (3.18)
- Utilities & Service Systems (3.19)
- Wildfire (3.20)
- Mandatory Findings (3.21)

1.7.3 Impact Levels
There are four possible responses to the threshold of significance questions in each of the topical environmental factors in Section 3 - Environmental Evaluation:

1. *No Impact*: No substantial evidence exists that the Project would have a direct primary project-level impact on the environment.
2. *Less Than Significant Impact*: Direct project-level impacts have been identified but are less than the thresholds of significance and do not include or require mitigation measures.
3. *Less Than Significant Impact With Mitigation Incorporated*: Direct project-level impacts have been identified but are less than significant with the incorporation of mitigation measures thereby reducing an impact from Potentially Significant Impact to a Less Than Significant Impact.
4. *Potentially Significant Impact*: Potentially significant direct project-level impacts and have been identified and require preparation of an EIR.

1.8 Environmental Baseline
To adequately determine the significance of a potential environmental impact, the environmental baseline must be established. Guidelines Section 15125(a) states in pertinent part that the environmental setting will normally constitute the baseline physical conditions, by which a lead agency will determine if an impact is significant.

Therefore, the environmental baseline for this Project constitutes the existing physical conditions as they currently exist, which represents the time that the environmental process commenced.

1.9 Environmental Determination

The following table provides the environmental determination of the Project.

Table 1: Environmental Determination

I find that there is no substantial evidence that the project will have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.	☒
I find that although the proposed project could have a significant effect on the environment, revisions to the project or proposals have been made by or agreed to by the project proponent, that will avoid the effects or mitigate the effects to where no significant effects on the environmental will occur. A **MITIGATED NEGATIVE DECLARATION** (**MND**) will be prepared.	☐
I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** (**EIR**) is required.	☐
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **EIR** is required, but it must analyze only the effects that remain to be addressed.	☐
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** (**ND**) pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document.	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the CEQA Guidelines. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project, which are documented in this addendum to the earlier CEQA document (CEQA §15164).	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document (**ND** , **MND** or **EIR**) pursuant to CEQA Guidelines Sections 15162 through 15163.	☐

Kevin Shannon
Signature

August 11, 2022
Date

Kevin Shannon, Consultant - Environmental Planner
Name

Section 2: Project Description

Introduction

This section provides the project background, location and environmental setting, and the characteristics of the Project.

2.1 Project Background

In accordance with State law, the County is required to update its Housing Element every eight years. For each eight-year planning cycle, the County is allocated a specific number of housing units (i.e., Regional Housing Needs Assessment (RHNA) allocation). The RHNA quantifies current and future housing needs within a jurisdiction.

The Housing Element establishes the County's official housing policies and programs to accommodate the County's RHNA allocation goals and identifies available candidate housing sites to meet those goals.

In addition to updating the Housing Element, the Land Use Element requires an amendment to maintain internal consistency with the Housing Element. Similarly, the Safety Element requires an amendment when the Housing Element is amended. An Environmental Justice Element is also required to be created when two or more existing General Plan elements are concurrently revised after January 2018. Last, the Zoning Code requires revisions to the existing Housing Opportunities Overlay to maintain consistency with programs included Housing Element Update.

2.2 Project Location and Environmental Setting

The proposed Project is located within the unincorporated portion of Orange County (refer to Figure 2) and specifically within sites suitable to accommodate the RHNA allocation. The sites may be developed with different land uses consisting of residential, commercial, office, retail, and industrial.

2.3 Project Characteristics

The Project consists of the following five components. Descriptions of each are provided below.

- 6th Cycle Housing Element Update
- Land Use Element Amendment
- Safety Element Amendment
- Environmental Justice Element
- Zoning Code Amendment - Housing Opportunities Overlay District

2.3.1 6th Cycle Housing Element Update

The County of Orange Housing Element establishes policies, procedures, and incentives in its land use planning and development activities that will result in the maintenance and expansion of the housing supply to adequately accommodate households of the current and future population living in the unincorporated County. The Housing Element institutes policies that will guide County decision-making and establishes a Housing Action Plan to implement housing goals through an eight-year planning period. On October 15, 2021, the 5th Cycle (2013-2021) planning period ended and the 6th Cycle (2021-2029) planning period began.

Although certain County housing programs operate within cities, the County's Housing Element primarily addresses housing needs in the unincorporated areas to meet the various income levels. The County's Housing Element makes provisions for affordable and accessible housing for special needs groups in the community and is designed to provide guidance in the maintenance of existing affordable housing. These commitments are an expression of the statewide housing goal of "decent housing and a suitable living environment for every California family."

The Housing Element Update will include the County's Housing Action Plan, which addresses the County's identified housing needs, and includes goals, policies, and programs concerning housing and housing-related services, and the County's approach to addressing its Regional Housing Needs Assessment (RHNA) allocation, its share of the regional housing need. The 6th Cycle (2021-2029) Housing Element Update consists of a comprehensive review and an update to the previous Housing Element, which covered the 5th Cycle (2013-2021) planning period.

To satisfy and meet its RHNA allocation, the County completed a parcel-specific land inventory that includes sites capable of accommodating the RHNA allocation of 10,406 units and is included in the land inventory section of the Housing Element. The County is required to identify areas with adequate zoning to accommodate this future growth, however, it is not required to develop these housing units.

The 6th Cycle Housing Element Update does not grant any land use entitlements or authorize development of a specific project, nor does it consider candidate housing sites not already zoned for residential development or non-residentially zoned sites that allow residential development with the existing Housing Opportunities Overlay.

2.3.2 Land Use Element Amendment

The County of Orange Land Use Element describes objectives, policies, and land use patterns for the unincorporated area. It also establishes development criteria and standards, including population density and building intensity. Land use categories are used to depict the general distribution, location, and extent of public and private uses of land. The update will include the following proposed revisions:

- The "Land Use Categories" section will be revised to reflect current permitted uses allowed by the County's Zoning Code, such as the Housing Opportunities Overlay District regulations, and 6th Cycle Housing Element Update, no new permitted uses will be proposed.
- The "Building Intensity/Population Density Standards" chart (Table III-I) requires an update to reflect current regulations in the County's Zoning Code, no new standards will be proposed.
- The County's land use-related "Objectives and Policies" will be revised to reflect any changes to these that may have been adopted since the previous Land Use Element amendment, no new objectives and policies will be proposed.
- The "Planning Constraints and Deficiencies" section will be revised to ensure internal consistency with the other elements of the County's General Plan including the 6th Cycle Housing Element Update.

2.3.3 Safety Element Amendment

The California Government Code requires general plans to include "a safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to

mudslides and landslides, subsidence and other geologic hazards known to the legislative body; flooding; and wildland and urban fires."

The purpose of the County's Safety Element is to comprehensively inventory hazards which primarily impact persons and property in the unincorporated areas of Orange County. The scope of the Safety Element also allows for a countywide perspective for other safety-related matters. This hazards inventory identifies information necessary for the development of goals, objectives, policies, and implementation programs that will guide and direct local government decision-making in safety-related matters and also foster coordination with regional, state, and federal policies and programs.

An update, or amendment, of the County of Orange Safety Element is required to ensure compliance with California Government Code Section 65302(g)(3). Under this Government Code, upon the next revision to the County's Housing Element, which is currently underway, the Safety Element must be updated to address new statutory considerations regarding the risk of wildland fire in State Responsibility Areas and in Very High Fire Hazard Severity Zones. The update must meet specific requirements including those set forth in the Office of Planning and Research's "Fire Hazard Planning" document and the General Plan Guidelines.

The Safety Element update will: 1) add information regarding existing planned development and agencies responsibilities, 2) revise goals, policies, and objectives that address climate vulnerability and adaptation per Senate Bill 379, 3) revise goals, policies, and objectives as necessary to maintain integrity of essential public facilities, and 4) update the County's hazards inventory. In addition, the Governor's Office of Emergency Services (Cal OES) has established new and specific requirements for incorporation of the County's Hazard Mitigation Plan (HMP) into the Safety Element to maintain the County's eligibility for pre-disaster mitigation funding per Assembly Bill 2140. This will include the addition of a Uniform Resource Locator (URL) pointing readers directly to the County's HMP. The Safety Element update will meet these new Cal OES requirements.

2.3.4 Environmental Justice Element

The County of Orange will add an Environmental Justice Element to the General Plan pursuant to Government Code Section 65302 (h)(1). This statute requires that upon the adoption or next revision of two or more existing elements concurrently on or after January 1, 2018, counties that have disadvantaged communities shall incorporate environmental justice policies into their general plans, either in a separate Environmental Justice element or by integrating related goals, policies, and objectives throughout the other elements. The County is currently in the process of completing its 6th Cycle Housing Element Update and will also be completing an associated amendment to its Land Use Element. These two General Plan amendments trigger the requirement for the County to comply with the statute at this time.

According to the California Environmental Protection Agency (Cal EPA) website, "the aim of Environmental Justice is to lift the unfair burden of pollution from those most vulnerable to its effects." According to the California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen, versions 3.0 and 4.0, several census tracts that include unincorporated areas have been identified as disadvantaged communities.

The objective of the new Environmental Justice Element is to provide for the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to

the implementation of environmental laws, regulations, and policies. The new Environmental Justice Element will include goals, policies, and programs to address environmental justice. This will include ensuring the opportunity for meaningful participation in the public process, minimizing to the extent feasible exposure of residents to pollution in the environment, increasing mobility and accessibility for all residents, and reviewing opportunities for affordable housing from an environmental justice perspective.

2.3.5 Orange County Zoning Code Amendment

The purpose of the Housing Opportunities Overlay District (HOO) Regulations, Zoning Code section 7-9-44, is to increase the number of sites available for the development of affordable housing, emergency shelters, and multi-service centers in the unincorporated area. The HOO was adopted by the Board of Supervisors on January 10, 2006, and amended in 2008 and 2013 to increase the number of eligible sites. The intent of the HOO is to facilitate the development of affordable housing within commercial, industrial, and select high-density zoned sites. The HOO Regulations allow eligible projects to be constructed in commercial, industrial, and certain high-density residential areas. All residential projects developed under the HOO Regulations are eligible to take advantage of the State Density Bonus Law to increase the allowable density on the development site and to receive up to three incentives (waiver of site development standards) that are intended to make the development more economically feasible.

The Housing Opportunities Overlay allow eligible development in the following zoning districts:

- C1 – “Local Business”
- C2 – “General Business”
- CC – “Commercial Community “
- CH – “Commercial Highway “
- R2 – “Multi-Family Dwellings “
- R3 – “Apartment “
- CN – “Commercial Neighborhood “
- PA – “Professional & Administrative Office “
- M1 – “Light Industrial “
- R4 – “Suburban Multi-Family Residential”
- RP – “Residential-Professional “

The HOO Regulations currently applies a base density of 43 units per acre on affordable housing projects located within the commercial and industrial zoning districts of the HOO. These projects may request an increase in density either under the provisions of the County’s Zoning Code or State Density Bonus Law. The intended target population for the affordable housing development will determine the percentage of a density bonus the project is eligible for. Applying the Zoning Code provisions could result in up to a maximum of a 45% density bonus, or 63 units per acre. Applying the State Density Bonus Law could result in up to an 80% increase in density, or 78 units per acre. Affordable housing projects located in high-density residential areas are subject to the base density for that zoning district but would also be eligible for a density bonus.

The proposed revisions to the HOO Regulations would:

- Increase the base density applied to eligible affordable housing projects within commercial and industrial zoning districts from 43 units per acre, up to 70 units per acre.

- Apply the base density of up to 70 units per acre to all eligible affordable housing projects within high-density residential zoning districts, regardless of the maximum density of the underlying district.
- All high-density zoned residential sites located within the City of Costa Mesa Sphere of Influence are specifically excluded.

The increased base density applied to eligible affordable housing projects is intended to facilitate the development of affordable housing, one of the County's goals set forth in its Housing Element.

2.4 Project Approvals

Following the completion of the mandatory public review period, the proposed Housing Element and amendments would be scheduled for a public hearing before the Orange County Planning Commission followed by the Orange County Board of Supervisors. The Planning Commission will review the IS/ND with the proposed amendments and provide a recommendation to the Board of Supervisors. The following table provides the public agency approvals.

Table 2: Public Agency Approvals

Entity	Action
Planning Commission	• Provide Recommendation that the Board of Supervisors Adopt the IS/ND • Provide Recommendation that the Board of Supervisors Approve the Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01
Board of Supervisors	• Adopt IS/ND • Approve Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01
Department of Housing and Community Development	• Determine the Housing Element is substantially compliant with state housing element law
Board of Forestry and Fire Protection	• Review revised Safety Element and provides written comments

Source: OC Public Works, Development Services/Planning, June 2022.

Section 3: Environmental Evaluation

3.1 Aesthetics *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Response to Impact Questions (a - d): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Aesthetics would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Aesthetics.

References

California Department of Transportation (Caltrans). 2018. California Scenic Highway Mapping System – Orange County. Accessed online:
http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm

Orange, County of. General Plan, Scenic Highway Plan. 2005

3.2 Agriculture and Forestry Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51004)g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	☐	☐	☐	☒

Response to Impact Questions (a – e): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Agriculture and Forestry Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Agriculture and Forestry Resources.

References

Orange, County of. General Plan, Resources Element. 2012

Department of Agriculture, U.S. 2012 Census of Agriculture.

3.3 Air Quality *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

Response to Impact Questions (a – e): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Air Quality would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because

there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Air Quality.

References

Orange, County of. Draft Housing Element Update HE 20-01, Draft Safety Element Update SE 19-01, Draft Land Use Element Update LUE 22-01, Draft Environmental Justice Element EJ 22-01, and draft Zoning Code Amendment CA 22-01

South Coast Air Quality Management District. 2016 Air Quality Management Plan (Final). December 2016.

3.4 Biological Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Response to Impact Questions (a – f): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Biological Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Biological Resources.

References

Orange, County of. Natural Community Conservation Plan & Habitat Conservation Plan. July 1996.

3.5 Cultural Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Response to Impact Questions (a - d): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Cultural Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Cultural Resources.

References

Orange, County of. General Plan, Resources Element. 2013

_____. General Plan, Land Use Element. 2015

3.6 Energy *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Energy would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Energy.

References
No references are associated with this topic.

3.7 Geology and Soils *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: ii) Strong seismic ground shaking?	☐	☐	☐	☒
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal system where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Response to Impact Questions (a - e): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Geology and Soils would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Geology and Soils.

References

Orange, County of. General Plan, Safety Element. 2013

_____. General Plan, Land Use Element. 2015

3.8 Greenhouse Gas Emissions *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Greenhouse Gas Emissions would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Greenhouse Gas Emissions.

References

California Air Pollution Control Officers Association.

South Coast Air Quality Management District. Final Draft 2016 Air Quality Management Plan. December 2016.

3.9 Hazards and Hazardous Materials *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Response to Impact Question (a - h): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation updates the County's hazards inventory and integrates the County's Hazard Mitigation Plan into the Safety Element (refer to Section 2.3.3).

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the eight threshold questions specific to Hazards and Hazardous Materials would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Hazards and Hazardous Materials.

References

Orange, County of. General Plan, Land Use Element. 2015

_____. Health Care Agency, Environmental Health Division.

_____. Airport Land Use Commission.

Orange County Fire Authority

3.10 Hydrology and Water Quality *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Would the project [result in] inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Response to Impact Questions (a - j): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the ten threshold questions specific to Hydrology and Water Quality would result

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Hydrology and Water Quality.

References

Orange, County of. General Plan, Public Services and Facilities Element. 2012

_____. General Plan, Land Use Element. 2015

3.11 Land Use and Planning *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Response to Impact Questions (a - c): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation updates the Land Use Element to revise the Land Use Categories list, Table III-I to reflect current regulations in the County Zoning Code, revise Objectives and Policies, and revise the Planning and Deficiencies section (refer to Section 2.3.2) to ensure consistency in all plans and zoning documents.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the three threshold questions specific to Land Use and Planning would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Land Use and Planning.

3.10.3 References

Orange, County of. General Plan, Land Use Element. 2015

3.12 Mineral Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Mineral Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Mineral Resources.

References

Orange, County of. General Plan, Resources Element. 2013

3.13 Noise *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Response to Impact Questions (a - f): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70

units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Noise would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Noise.

References

Orange, County of. General Plan, Noise Element. 2012

3.14 Population and Housing *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Response to Impact Questions (a - c): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact or induced population growth, no impacts related to the three threshold questions specific to Population and Housing would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Population and Housing.

References

Orange, County of. General Plan, Housing Element. 2013

3.15 Public Services *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: i) Fire protection? ii) Police protection? iii) Schools? iv) Parks? v) Other public facilities?	☐	☐	☐	☒
Impact Conclusion: i) Fire protection	☐	☐	☐	☒
Impact Conclusion: ii) Police protection	☐	☐	☐	☒
Impact Conclusion: iii) Schools	☐	☐	☐	☒
Impact Conclusion: iv) Parks	☐	☐	☐	☒
Impact Conclusion: v) Other public facilities	☐	☐	☐	☒

Response to Impact Questions (ai - aiv): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Public Services would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Public Services.

References

Orange, County of. General Plan, Public Services & Facilities Element. 2012

Orange, County of. General Plan, Recreation Element. 2012

3.16 Recreation *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion or recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Recreation would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Recreation.

References

Orange, County of. General Plan, Public Services & Facilities Element. 2012

_____. General Plan, Recreation Element. 2012

3.17 Transportation/Traffic *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities?	☐	☐	☐	☒

Response to Impact Questions (a - f): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to

Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Transportation/Traffic would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Transportation/Traffic.

References

Orange, County of. General Plan, Transportation Element. 2012

3.18 Tribal Cultural Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level

impact, no impacts related to the four threshold questions specific to Aesthetics would result. Refer to Section 1.6 that discusses Tribal consultation.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Tribal Cultural Resources.

References
No references are associated with this topic.

3.19 Utilities and Service Systems *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Response to Impact Questions (a - g): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing

projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the seven threshold questions specific to Utilities and Service Systems would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Utilities and Service Systems.

References

Orange, County of. General Plan, Public Services and Facilities Element. 2012

3.20 Wildfire *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Response to Impact Questions (a - d): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation merely updates the Safety Element to address new statutory requirements for fire risks in State Responsibility areas and Very High Fire Hazard Severity Zones to meet the requirements of the Office of Planning and Research's Fire Hazard Planning document. (refer to Section 2.3.3).

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or

existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Wildfire would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Wildfire.

References
No references are associated with this topic.

3.21 Mandatory Findings of Significance *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	☒
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Response to Impact Question a): Refer to Section 3.4 - Biological Resources and Section 3.5 - Cultural Resources. As discussed in these sections, the proposed Project would have no effect on fish or wildlife habitat or population, plant or animal communities, protected species, or important examples of the major periods of California history or prehistory. Therefore, no impacts would not result from Project implementation.

Response to Impact Question b): There are no impacts resulting from this Project as analyzed in Sections 3.1 through 3.20 in this IS/ND. Therefore, no cumulative impacts would be created and the Project is not cumulatively considerable.

Response to Impact Question c): Sections 3.1 through 3.20 in this IS/ND analyzed potential impacts and did not identify any impacts resulting from Project implementation. Therefore, no significant adverse effects on human beings, either directly or indirectly, have been identified and no impacts would result.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: All potential impacts were evaluated and determined to result in no impacts.

Section 4: List of Preparers

The table below provides the list of individuals who participated in the preparation of this IS/ND.

Table 3: List of Preparers

Preparer	Role
Justin Kirk, Planning Manager OC Public Works, Development Services/Planning	Project Director
Cindy Salazar, Land Use Manager - Advance Planning OC Public Works, Development Services/Planning	Program Manager
Ruby Maldonado, Senior Contract Planner OC Public Works, Development Services/Planning	Project Manager
Yuritzy Randle, Associate Planner OC Public Works, Development Services/Planning	Research
Kevin Shannon, Consultant - Environmental Planner OC Public Works, Development Services/Planning	Environmental Analysis
Kimley-Horn & Associates, Inc.	Housing Consultant

Source: OC Public Works, Development Services/Planning, June 2022.

Addendum No. 1 to the Initial Study/Negative Declaration No. IP 22-0133
for
Housing-Related Amendments to the County of Orange General Plan and Comprehensive Zoning Code

Prepared for:

County of Orange Planning Commission
and
Board of Supervisors
601 North Ross Street
Santa Ana, CA 92701

Prepared by:

OC Public Works/OC Development Services/Planning
601 North Ross Street
Santa Ana, CA 92701

May 2024

Table of Contents

Chapter 1: Introduction 2
1.1 Project Title 2
1.2 Lead Agency Name | Address 2
1.3 Lead Agency Contact Person | Telephone Number | Email 2
1.4 Project Location 2
1.5 Environmental Documentation 2
Chapter 2: Environmental Determination 6
Chapter 3: Project Changes 7
3.1 Introduction 7
3.2 Proposed Project 7
3.3 Environmental Setting and Surrounding Land Uses 7
Chapter 4: Environmental Evaluation 9
4.1 Analysis Methodology 9
4.2 Evaluation 9
4.2.1 Aesthetics 10
4.2.2 Agriculture and Forestry Resources 11
4.2.3 Air Quality 12
4.2.4 Biological Resources 13
4.2.5 Cultural Resources 14
4.2.6 Energy 15
4.2.7 Geology and Soils 15
4.2.8 Greenhouse Gas Emissions 16
4.2.9 Hazards and Hazardous Materials 17
4.2.10 Hydrology and Water Quality 19
4.2.11 Land Use and Planning 21
4.2.12 Mineral Resources 22
4.2.13 Noise 22
4.2.14 Population and Housing 23
4.2.15 Public Services 24
4.2.16 Recreation 25
4.2.17 Transportation 26
4.2.18 Tribal Cultural Resources 27
4.2.19 Utilities and Service Systems 28
4.2.20 Wildfire 29
4.2.21 Mandatory Findings of Significance 31
Chapter 5: Conclusion 32

List of Figures

Figure 1: Regional Location 4
Figure 2: Orange County Unincorporated Areas 5

List of Tables

Table 1: Environmental Determination 6

Chapter 1: Introduction

The purpose of this Addendum is to document minor changes to the Initial Study/Negative Declaration (IS/ND) No. IP 22-0133 for the Housing-Related Updates to the County of Orange General Plan and Comprehensive Zoning Code Project (Project) adopted in September 2022.

1.1 Project Title

Housing-Related Amendments to the County of Orange General Plan and Comprehensive Zoning Code

1.2 Lead Agency Name | Address

County of Orange
OC Public Works, Development Services/Planning
601 North Ross Street
Santa Ana, California 92701

1.3 Lead Agency Contact Person | Telephone Number | Email

Cindy Salazar, Planning Division Manager
OC Development Services/Planning
Telephone: 714.667.8870
Cindy.Salazar@ocpw.ocgov.com

1.4 Project Location

The Project location is the unincorporated portion of Orange County. Orange County is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles. Refer to Figure 1 – Regional Location and Figure 2 – Orange County Unincorporated Areas.

1.5 Environmental Documentation

Pursuant to Section 15164 of the CEQA Guidelines, an addendum to an adopted Negative Declaration may be prepared if "only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent environmental impact report or negative declaration have occurred."

The project considered in the prior environmental document IS/ND No. IP 22-0133 (IS/ND No. IP 22-0133) examined implementing a policy framework necessary to meet housing needs by accommodating the County's RHNA allocation of 10,406 units through housing-related amendments to the County of Orange General Plan (GP) Elements and Comprehensive Zoning Code (ZC). IS/ND No. IP 22-0133 analyzed the expansion of the Housing Opportunities Overlay, which included a maximum development density of up to 70 dwelling units per acre (du/ac) for eligible affordable housing projects located in commercial, industrial, and multifamily residential base districts. The current proposed Project would rezone residential professional (RP) and commercial zoning districts[1] to a new Mixed-Use (MX) zone and would

[1] The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in this Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

rezone Two-Family Residential (R2D) zones to either the Multifamily Dwellings (R2) or Suburban Multifamily Dwellings (R4) zones depending on where the R2D is located. In addition, the proposed Project would update the multifamily residential development standards to require a minimum base density of 30 du/ac.

This Addendum evaluates the proposed changes to the zoning districts and the requirement of a minimum base density specific to multifamily residential zoned properties. The update to the base density is less than the 70 du/ac maximum density for the Housing Opportunities Overlay studied in IS/ND No. IP 22-0133. In addition, multifamily zoning districts currently allow a 43 du/ac maximum density, which is considered the baseline existing condition for analysis of the new minimum required density. The proposed changes to the GP and ZC fall within the scope of the resource impacts as analyzed in the previously prepared environmental document.

None of the conditions described in Sections 15162 have been met. The proposed changes to the housing-related portions of the County of Orange GP and Comprehensive ZC will not significantly impact any resources as described in adopted IS/ND No. IP 22-0133. The proposed changes are consistent with the original intent of the amendments described in and analysis of IS/ND No. IP 22-0133. Therefore, preparation of an Addendum to adopted IS/ND No. IP 22-0133 is appropriate to satisfy the requirements of CEQA.

Figure 1: Regional Location

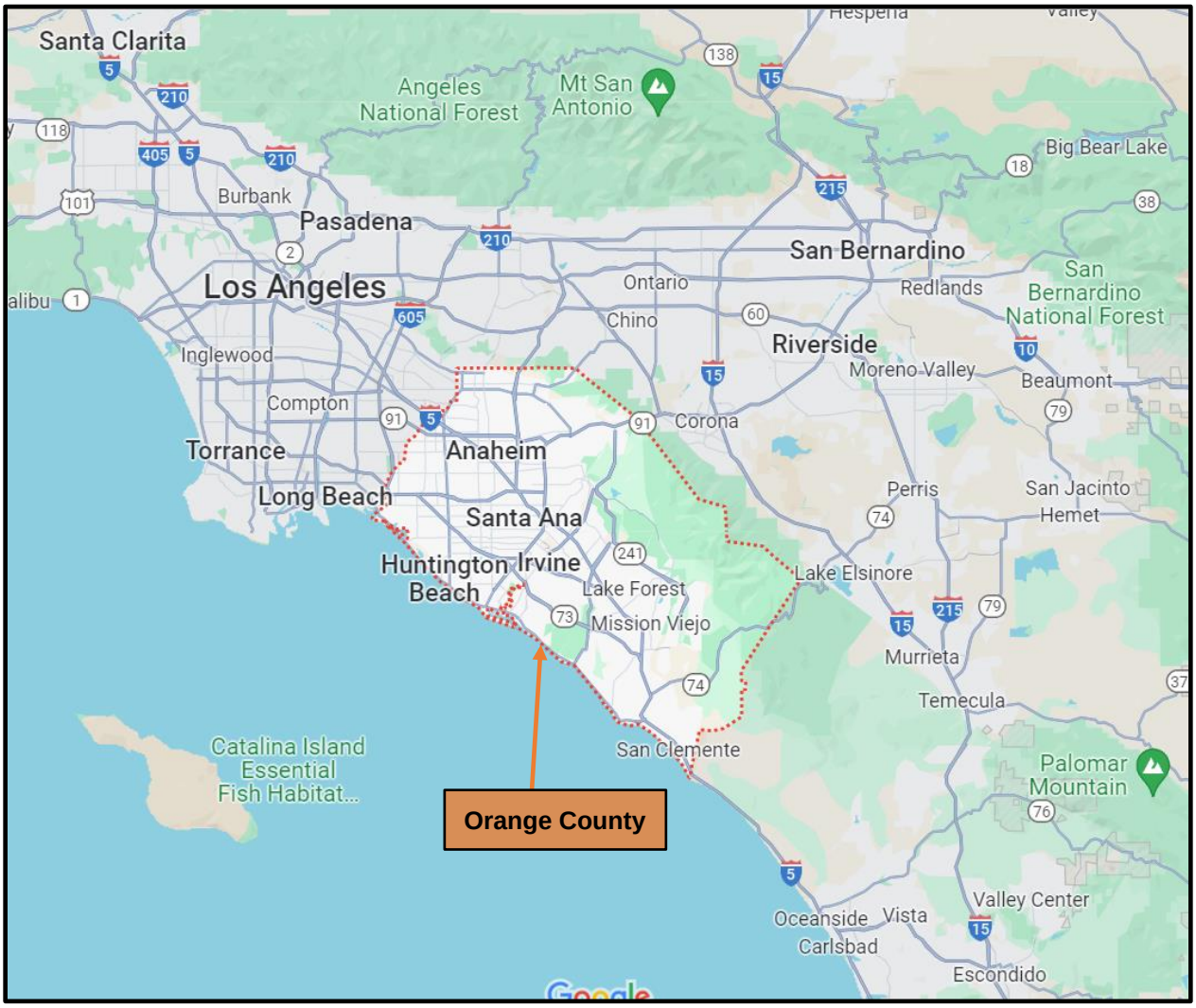
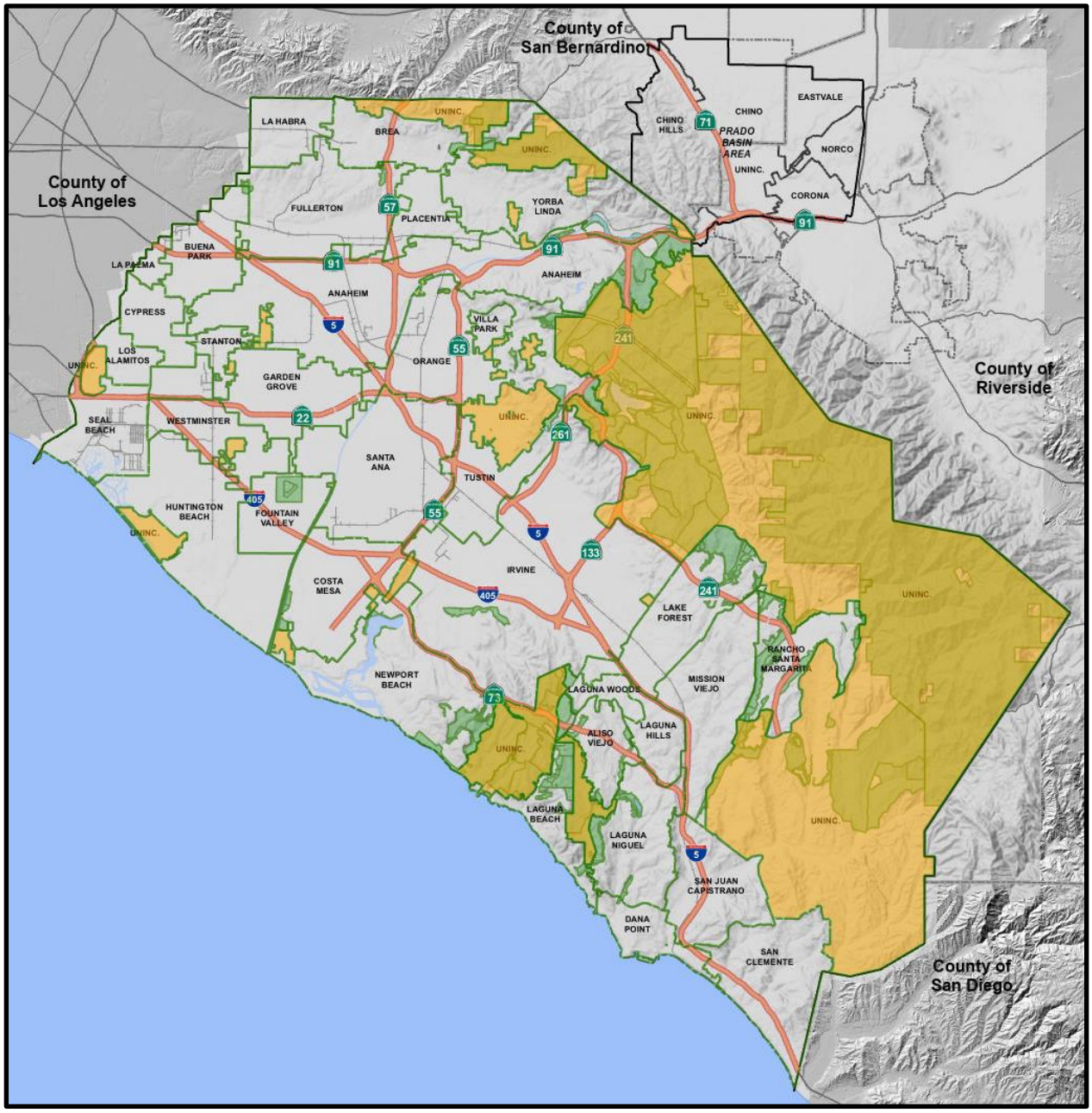


Figure 2: Orange County Unincorporated Areas



Chapter 2: Environmental Determination

Based on the analysis conducted in this Addendum, the County of Orange, OC Public Works, Development Services/Planning, as the Lead Agency, has made the following determination:

Table 1: Environmental Determination

I find that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.	☐
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.	☐
I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.	☐
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.	☐
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document adopted/certified pursuant to the State CEQA Guidelines and the County's adopted Local CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document	☐
I find that the potential environmental impacts associated with the proposed project have previously been analyzed as part of an earlier CEQA document adopted/certified pursuant to CEQA. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project, which are documented in this addendum to the earlier CEQA document (CEQA §15164) (IS/ND No. IP 22-0133 was adopted by the Orange County Board of Supervisors on September 27, 2022).	☒
I find that the proposed project Has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document (ND or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.	☐



Signature

April 29, 2024
Date

Virginia Gomez
Printed Name

Chapter 3: Project Changes

3.1 Introduction

Initial Study/Negative Declaration (IS/ND) No. IP 22-0133 (IS/ND No. IP 22-0133) evaluated the impacts of certain County actions, including a Zoning Code (ZC) Amendment to increase the existing base density maximum from 43 dwelling units per acre (du/ac) to 70 du/ac for eligible affordable housing projects located in the Housing Opportunities Overlay zones in commercial, industrial, and multifamily residential districts. The County used IS/ND No. IP 22-0133 to support the ZC Amendment, along with actions to update: (1) the County's Housing Element for the 6th Cycle (2021-2029); (2) the Land Use Element; and (3) the Safety Element; and (4) preparation of an Environmental Justice Element. These actions covered by IS/ND No. IP 22-0133 supported the County's completion of the 6th Cycle Housing Element, including satisfying the County's Regional Housing Needs Assessment (RHNA) allocation of 10,406 units.

IS/ND No. IP 22-0133 evaluated the increase of the base density for eligible projects within the Housing Opportunities Overlay and associated General Plan (GP) and ZC amendments and concluded that Project implementation would result in no direct or indirect impacts to the environment as demonstrated in the evaluation of each resource category. The Orange County Board of Supervisors adopted IS/ND No. IP 22-0133 for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC on September 27, 2022. However, since the adoption of IS/ND No. IP 22-0133, changes in State Law and in the County's ability to meet its RHNA allocation have resulted in required updates to the County's ZC and GP to ensure these policy documents remain consistent with the law.

3.2 Proposed Project

This Addendum evaluates updates to the County GP and Comprehensive ZC needed to conform to State law. To satisfy and meet its RHNA allocation in a manner consistent with State law, the County will rezone residential professional (RP) and commercial zoning districts[2] to a new Mixed-Use (MX) zone and would rezone the Two-Family Residential (R2D) zone to the Multifamily Dwellings (R2) or Suburban Multifamily Dwellings (R4) zones (proposed Project). In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. The MX zone is proposed to apply to the same zoning districts as the existing Housing Opportunities Overlay.

This Addendum evaluates the proposed changes to zoning districts and to the minimum base density specific to multifamily residential zoned properties. The update to the minimum base density is less than the 70 du/ac maximum density for the Housing Opportunities Overlay studied in IS/ND No. IP 22-0133. Multifamily zoning districts currently allow a 43 du/ac maximum, which is considered the baseline existing condition for analysis of the new minimum required density in the existing zoning districts and the new MX Zoning District. Therefore, the proposed zone changes and revised development standards fall within the Project evaluated in IS/ND No. IP 22-0133, which was intended to increase the number of available sites for the development of affordable housing.

3.3 Environmental Setting and Surrounding Land Uses

The proposed Project is located within the unincorporated portion of Orange County (refer to Figure 2) and specifically within sites suitable to accommodate portions of the County's RHNA allocation. The sites

[2] The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

are presently developed with different land uses consisting of residential, commercial, office, retail, and industrial uses and are non-vacant. Each of the multifamily zoned areas are currently zoned for development at a density of up to 43 du/ac, and all multifamily or commercial zoned areas are currently subject to the Housing Opportunities Overlay, which allows individual properties the option of utilizing a higher maximum development density of 70 du/ac if the proposed development includes affordable housing. Additionally, these areas are subject to existing development standards that require a Site Development Permit for developments that include five (5) units or more. This requirement to obtain a Site Development Permit for developments with five (5) units or more would not change as part of the proposed Project. With the existing Housing Opportunities Overlay in place, the locations affected by the proposed Project currently allow multifamily housing developments (both affordable and market-rate), like those that would be permissible as part of the proposed Project.

Chapter 4: Environmental Evaluation

4.1 Analysis Methodology

The analysis in this section is based on the Initial Study/ Negative Declaration prepared for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project (IS/ND No. IP 22-0133) and identifies the changes that would be necessary (if any) to reflect the new MX zone and establishment of a minimum base density.

The purpose of this Addendum is to compare the proposed zoning and development standard changes to the project analyzed in IS/ND No. IP 22-0133, and to determine if the scope and analysis of IS/ND No. IP 22-0133 adequately analyzes the potential impacts of these changes or if any of the conditions described in Section 15162 of the State CEQA Guidelines are present.

Conditions described in CEQA Guidelines Section 15162 that would trigger the need to prepare an Subsequent EIR, an Supplemental EIR, or other environmental documentation to evaluate project impacts include: (1) changes to the project that require major revisions of the previous environmental documentation due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; (2) substantial changes with respect to the circumstances under which the project is undertaken that require major revisions of the previous environmental documentation due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; or (3) the availability of new information of substantial importance relating to significant effects or mitigation measures or alternatives that was not known and could not have been known when the environmental documentation was certified as complete.

IS/ND No. IP 22-0133 is incorporated by reference into this Addendum, consistent with CEQA Guidelines Section 15150.

4.2 Evaluation

IS/ND No. IP 22-0133 concluded that all potential direct or indirect impacts from updating the Housing Opportunities Overlay, which included an increase of maximum density from 43 to 70 dwelling units per acre (du/ac) for eligible projects, were evaluated and determined to result in no impacts. As noted in IS/ND No. IP 22-0133, the project that was considered implements a policy framework necessary to meet housing needs to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts[3] to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. In addition, prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a site development permit process for

[3] The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

housing developments with five (5) units or more. The proposed Project would introduce a new minimum density of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone.

The County is legally obligated to identify suitable sites but not required to propose development as part of the Housing Element update. Project implementation merely increases potential development density. The proposed updates do not grant any land use entitlements, authorize development of any specific development project, or require any direct physical changes to land or existing development. Planning review with OC Development Services/Planning would still be required for any new development proposed that includes five (5) units or more, even if that development is consistent with the amended GP Elements and Comprehensive ZC. Per the existing ZC, multifamily development projects of five (5) or more dwelling units are permitted subject to a Site Development Permit and reviewed by the Director of OC Development Services/Planning. This requirement would not change as part of the proposed Project. Therefore, the rezone of RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones are consistent with IS/ND No. IP 22-0133. Analysis of the environmental factors potentially affected by this Project is provided below.

4.2.1 Aesthetics

a. Have a substantial adverse effect on a scenic vista?

Consistent with Section 3.1 (Aesthetics) of adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of an actual proposed development against the development standards, including building heights and setback requirements for the purposes of protecting the scenic vistas. Therefore, the proposed Project would not cause additional direct or indirect impacts to scenic vistas that were not previously analyzed in IS/ND No. IP 22-0133.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to scenic resources within state scenic highways that were not previously analyzed in IS/ND No. IP 22-0133.

c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to the existing visual character in nonurbanized and urbanized areas and would not conflict with the existing zoning or regulations that were previously analyzed in IS/ND No. IP 22-0133.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to daytime and nighttime views due to light and glare that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.2 Agriculture and Forestry Resources

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any agricultural zones or prime farmland. The proposed Project would not cause additional direct or indirect impacts related to farmland that were not previously analyzed in IS/ND No. IP 22-0133.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any agricultural zones or parcels with Williamson Act contracts. The proposed Project would not cause additional direct or indirect impacts related to zoning for agricultural use that were not previously analyzed in IS/ND No. IP 22-0133.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any forest land, timberland, or timberland zoned for Timberland Production. The proposed Project would not cause additional direct or indirect impacts related to forest land or timberland that were not previously analyzed in IS/ND No. IP 22-0133.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

See response to c) above. The proposed Project would not cause additional direct or indirect impacts related to forest land that were not previously analyzed in IS/ND No. IP 22-0133.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply

to or affect any agricultural zones or prime farmland and does not convert any designated forest land to a non-forest use. The proposed Project would not cause additional direct or indirect impacts related to Agriculture and Forestry Resources that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.3 Air Quality

a. Conflict with or obstruct implementation of the applicable air quality plan?

Consistent with Section 3.3 (Air Quality) of adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework designed to meet the housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated and used for residential development and commercial development that allows housing. The parcels for which the existing zones are changing to MX, R2 or R4, or for which the minimum du/ac standards are being set, are already non-vacant developed sites. The MX zoning designation will allow both commercial and residential development consistent with the existing use of the identified parcels. The sites' existing and proposed zone designations already assume emissions generated by the nature of the land use and will continue to be consistent with existing air quality plans as the proposed Project does not include redevelopment of the affected parcels. Emissions in these zones are anticipated to be from vehicles such as trucks and passenger vehicles. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not conflict with and would not cause additional direct or indirect impacts related to implementation of applicable air quality plans or standards that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

See response to a) above. Given that the proposed Project does not include any proposed development, and instead consists of a policy framework designed to meet housing needs requirements for unincorporated Orange County, the proposed Project would not violate any air quality standard or contribute substantially to an existing or air quality violation.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

See response to a) above. The proposed Project would not generate new emissions beyond the existing uses and would not cause additional direct or indirect impacts related to increases in any criteria pollutants that were not previously analyzed in the IS/ND No. IP 22-0133.

d. Expose sensitive receptors to substantial pollutant concentrations?

See response to a) above. The proposed Project would not generate new emissions beyond the existing uses and would not cause additional direct or indirect impacts related to pollutant concentrations especially near sensitive receptors that were not previously analyzed in the IS/ND No. IP 22-0133.

e. Create objectionable odors affecting a substantial number of people?

See response to a) above. The proposed Project would not generate new emissions and would not cause additional direct or indirect impacts related an increase in objectionable odors that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.4 Biological Resources

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Consistent with Section 3.4 (Biological Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed and urbanized areas and does not affect natural open spaces, existing habitat, or wildlife corridors, and does not conflict with existing local policies for the protection of biological resources. The proposed Project is a policy framework to guide future development. Any future housing development of five (5) units or more in the multifamily residential or MX zones will require a Site Development Permit, a discretionary approval necessitating environmental review of the proposed development, including evaluation of impacts to biological resources. No actual development of the affected properties is authorized by the proposed Project. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts related to habitat modifications, on any species identified as a candidate, sensitive, or special status species that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to any riparian habitat or other sensitive natural community identified that were not previously analyzed in the IS/ND No. IP 22-0133.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to federally protected wetlands that were not previously analyzed in the IS/ND No. IP 22-0133.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to the movement of any species or with established native wildlife corridors or impede the use of native wildlife nursery sites that were not previously analyzed in the IS/ND No. IP 22-0133.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to local policies or ordinances for the protection of biological resources that were not previously analyzed in the IS/ND No. IP 22-0133.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

See response to e) above. The proposed Project would not cause additional direct or indirect impacts related to adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.5 Cultural Resources

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Consistent with Section 3.5 (Cultural Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to already developed and urbanized areas and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed. Any future housing development of five (5) units or more in the multifamily residential or MX zones will require a Site Development Permit that requires evaluation of impacts to environmental resources, including to archaeological, cultural, historical, and paleontological resources. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the significance of a historical resource as defined in § 15064.5 that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the significance of an archaeological resource pursuant to § 15064.5 that were not previously analyzed in IS/ND No. IP 22-0133.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

See response to a) above. Therefore, the proposed Project would not cause any direct or indirect impacts to a unique paleontological resource or site or unique geologic feature that were not previously analyzed in IS/ND No. IP 22-0133.

d. Disturb any human remains, including those interred outside of formal cemeteries?

See response to a) above. In addition, at the time of any future development, Health and Safety Code Section 7050.5 will apply and will require that a project follow the statutory protocol in the event human remains are found during construction. Therefore, the proposed Project would not cause additional direct or indirect impacts any human remains that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.6 Energy

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Consistent with Section 3.6 (Energy) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all separately proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects parcels that already consume energy based on the nature of the land use – existing residential and commercial uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project would not generate new unnecessary consumption of energy resources beyond the anticipated or existing uses on the parcels affected. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wasteful, inefficient, or unnecessary consumption of energy resources that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

See response to a) above. Therefore, the proposed Project would not cause any additional direct or indirect conflicts with or impacts to a state or local plan for renewable or energy efficiency that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.7 Geology and Soils

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
    ii. Strong seismic ground shaking?
    iii. Seismic-related ground failure, including liquefaction?
    iv. Landslides?

Consistent with Section 3.7 (Geology and Soils) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all separately proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed

development against development standards. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Should a future specific development be proposed, a project-specific soils and geotechnical report may be required to disclose any impacts. Therefore, the proposed updates to the GP and ZC do not propose development and would not cause additional direct or indirect impacts related to the earthquakes, liquefaction, landslides, soil erosion, and expansive soil that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Result in substantial soil erosion or the loss of topsoil?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to soil erosion or the loss of topsoil that were not previously analyzed in IS/ND No. IP 22-0133.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to soil stability, landslides, lateral spreading, subsidence, liquefaction, or collapse that were not previously analyzed in IS/ND No. IP-22-0133.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to expansive soils that were not previously analyzed in IS/ND No. IP 22-0133.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of wastewater?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the ability of soils to support the use of septic tanks or alternative wastewater disposal systems that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.8 Greenhouse Gas Emissions

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?

Consistent with Section 3.8 (Greenhouse Gas Emissions [GHG]) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated and used for residential development and commercial development that allows housing. The parcels for which the existing zones are changing to MX, R2 or R4, or for which the minimum du/ac standards are being set, are already non-vacant developed sites. The MX zoning designation will allow both commercial and residential development consistent with the existing use of the identified parcels. The sites' existing and proposed

zone designations already assume GHG emissions generated by the nature of the existing land use and will continue to be consistent with existing air quality plans. GHG emissions in these zones are anticipated to be from vehicles such as trucks and passenger vehicles that support the existing uses. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not generate new GHG emissions beyond the anticipated uses and would not cause additional direct or indirect impacts related to Greenhouse Gas Emissions and applicable plans that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

See response a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to compliance with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs which were not previously analyzed in IS/ND No. IP 22-0133.

4.2.9 Hazards and Hazardous Materials

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC do not propose development and would not cause additional direct or indirect impacts related to transporting or disposing of hazardous materials that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

See response to a) above. Therefore, the proposed Project would not cause any additional impacts related to hazardous materials that were not previously analyzed in IS/ND No. IP 22-0133.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas consisting of non-vacant lots, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Should a specific development be proposed in the future, a project-specific Phase I/Phase II Environmental Site

Assessment would be required to disclose any impacts and mitigation for any such impacts would be required. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to hazardous emissions or materials near schools that were not previously analyzed in the IS/ND No. IP 22-0133.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

See response to c) above. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to hazardous materials sites that were not previously analyzed in the IS/ND No. IP 22-0133.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are not located within an airport land use plan. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to airport land use plans that were not previously analyzed in the IS/ND No. IP 22-0133.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

See response to e) above. The proposed Project is not within the vicinity of a private airstrip and therefore would not cause additional direct or indirect impacts related to safety hazards caused by proximity to private airstrips that were not previously analyzed in IS/ND No. IP 22-0133.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized non-vacant sites that are consistent with all existing applicable emergency response plans. The proposed Project does not propose development that would not alter any existing emergency response plans. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC would not cause additional direct or indirect impacts related to emergency response or evacuation plans that were not previously analyzed in the IS/ND No. IP 22-0133.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire. Therefore, the proposed updates to the GP and ZC would not cause additional direct or indirect impacts related to wildland fires that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.10 Hydrology and Water Quality

a. Violate any water quality standards or waste discharge requirements?

Consistent with Section 3.10 (Hydrology and Water Quality) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all future proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects parcels that already assume water use and consumption generated by the nature of the existing and ongoing land uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. In addition, future construction activities associated with new housing development is subject to the National Pollutant Discharge Elimination System requirements and County Code requirements for drainage, discharge, and best management practices. Therefore, the proposed Project would not generate new unnecessary consumption of water resources or hydrology concerns and would not cause additional direct or indirect impacts related to Hydrology and Water Quality that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to depletion of groundwater supplies and groundwater recharge that were not previously analyzed in IS/ND No. IP 22-0133.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to drainage patterns, stream or river courses, erosion or siltation that were not previously analyzed in IS/ND No. IP 22-0133.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to drainage patterns, stream or river courses, surface runoff or flooding that were not previously analyzed in IS/ND No. IP 22-0133.

e. Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related storm water drainage systems and polluted runoff that were not previously analyzed in IS/ND No. IP 22-0133.

f. Otherwise substantially degrade water quality?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to water quality that were not previously analyzed in IS/ND No. IP 22-0133.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Consistent with Section 3.10 (Hydrology and Water Quality) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas with no flood risk, reduced flood risks due to levees, or designated as areas with one percent annual chance of floods. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. As such, the proposed Project would not cause additional direct or indirect impacts regarding the placement of housing along a 100-year flood hazard area that were not previously analyzed in the IS/ND No. IP 22-0133.

h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to placement of structures within a 100-year flood hazard area that were not previously analyzed in IS/ND No. IP 22-0133.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to risk of flooding that were not previously analyzed in IS/ND No. IP 22-0133.

j. Would the project [result in] inundation by seiche, tsunami, or mudflow?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to inundation by seiche, tsunami, or mudflow that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.11 Land Use and Planning

a. Physically divide an established community?

Consistent with Section 3.11 (Land Use and Planning) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would establish a minimum base density for multifamily residential development at 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation and the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts or physically divide established communities that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

See response to a) above. The proposed Project would incorporate changes into the County's Land Use Element, ZC, and GP; therefore, the proposed Project would not result in any additional direct or indirect impacts related to applicable land use plans, policies, or regulations that were not previously analyzed in IS/ND No. IP 22-0133.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

See response to a) above. The proposed Project applies to non-vacant sites that are already developed with existing uses. The proposed Project would continue to authorize uses of these non-vacant parcels consistent with the existing uses and does not propose any new development. Therefore, the proposed Project would not result in any additional direct or indirect impacts related to habitat conservation plans or natural community conservation plans that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.12 Mineral Resources

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Consistent with Section 3.12 (Mineral Resources) of the adopted IS/ND No. IP 22-0133, the proposed Project does not affect areas designated for mineral resources. The proposed Project applies to urbanized areas that are currently zoned for residential and commercial uses, and the updates establish a MX zone and development standards consistent with existing zoning designations. Therefore, the proposed Project would not cause additional direct or indirect impacts related to locally important mineral resources or result in a loss of those resources that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

See response to a) above. Therefore, because the proposed Project does not propose development and does not affect any locally important mineral resource recovery sites, it would not result in any additional direct or indirect impacts to a locally important mineral resource recovery site that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.13 Noise

a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Consistent with Section 3.13 (Noise) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects existing parcels with established multifamily and commercial uses that already have typical noise and groundborne vibration generated by the nature of those land uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The noise levels in proposed Project areas are anticipated to be from general residential and commercial activities, consistent with the existing uses. The MX zone designation will allow both commercial and residential development consistent with the existing uses. Therefore, the proposed Project would not increase ambient noise beyond the anticipated uses and would not cause additional direct or indirect impacts related to noise levels in excess of existing standards that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

See response to a) above. Therefore, the proposed Project would not result in additional direct or indirect impacts related to groundborne vibration or groundborne noise levels that were not previously analyzed in IS/ND No. IP 22-0133.

c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

See response to a) above. Therefore, because the proposed Project does not propose any development, it would not result in any additional direct or indirect impacts related to permanent increases in ambient noise levels that were not previously analyzed in IS/ND No. IP 22-0133.

d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

See response to a) above. Therefore, because the proposed Project does not propose any development, it would not result in any additional direct or indirect impacts related to temporary or periodic increases in ambient noise levels that were not previously analyzed in IS/ND No. IP 22-0133.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Consistent with Section 3.13 (Noise) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are not located within an airport land use plan. There is no development proposed. The proposed Project affects existing parcels with established multifamily and commercial uses that already have typical noise generated by the nature of the land use and proximity to airports. Therefore, the proposed Project would not expose people to excessive noise beyond the existing uses and would not cause additional direct or indirect impacts related to excessive noise levels due to proximity to public airports that were not previously analyzed in the IS/ND No. IP 22-0133.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

See response to e) above. The proposed Project does not affect parcels in the vicinity of a private airstrip; therefore, the proposed Project would not result in additional direct or indirect impacts related to excessive noise levels due to proximity to a private airstrip that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.14 Population and Housing

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Consistent with Section 3.14 (Population and Housing) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are

consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project applies to urbanized areas that are already designated for residential and commercial uses and anticipate population growth through the provision of housing. The proposed Project would not cause additional direct or indirect impacts related to inducing population growth that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

See response to a) above. The proposed Project does not propose development; therefore, the proposed Project would not result in any additional direct or indirect impacts related to displacement of housing that were not previously analyzed in IS/ND No. IP 22-0133.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

See response to a) above. The proposed Project does not propose development; therefore, the proposed Project would not result in any additional direct or indirect impacts related to displacement of persons that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.15 Public Services

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    i. Fire protection?
    ii. Police protection?
    iii. Schools?
    iv. Parks?
    v. Other public facilities?

Consistent with Section 3.15 (Public Services) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive

ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project applies to a developed and urbanized areas where fire and police protection services, schools, parks, and other public facilities are already provided, and are consistent with the level of anticipated public service needs in the GP. Therefore, the proposed Project would not cause additional direct or indirect impacts related to Public Services that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.16 Recreation

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Consistent with Section 3.16 (Recreation) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas that have existing recreational and public facilities. The proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The Project does not affect or require expansion of existing recreational or public facilities as the existing zones and GP anticipated housing development in the areas affected by the proposed Project and planned

existing recreational facilities to address that demand. The proposed Project would not cause additional direct or indirect impacts related to increasing the use of existing neighborhood and regional parks or other recreational facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to requiring the construction or expansion of recreational facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.17 Transportation

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project affects parcels that are already designated for residential and commercial development that allows housing. The Project updates apply to developed, urbanized areas with traffic generated by the existing residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the non-vacant parcels affected by the proposed Project. In addition, there is no development included in the proposed Project. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. All proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of the future proposed development against development standards. Therefore, the proposed Project would not generate new transportation demands or traffic beyond the existing uses, in part, because the GP anticipated public circulation and transit needs associated with the existing uses. Therefore, the proposed Project would not cause additional direct or indirect impacts related to applicable plans, ordinances, and policies establishing measures of effectiveness for the performance of the circulation system that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

See response to a) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated transportation needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to congestion management that were not previously analyzed in IS/ND No. IP 22-0133.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

See response to a) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated transportation needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to air traffic patterns that were not previously analyzed in IS/ND No. IP 22-0133.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects urbanized parcels that are non-vacant and designated for residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the affected parcels and provide emergency access. In addition, there is no development proposed with the updates to the GP and ZC. Therefore, the proposed Project would not cause additional direct or indirect impacts related to hazards due to design features that were not previously analyzed in the IS/ND No. IP 22-0133.

e. Result in inadequate emergency access?

See response to d) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated emergency access needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to emergency access that were not previously analyzed in IS/ND No. IP 22-0133.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects urbanized parcels that are non-vacant and designated for residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the affected parcels. The proposed Project does not conflict with policies and regulations for these systems, services and facilities. Therefore, the proposed Project would not cause additional direct or indirect impacts related to policies and regulations regarding public active transportation facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.18 Tribal Cultural Resources

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?
    ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public

Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Consistent with Section 3.18 (Tribal Cultural Resources) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed with the updates to the GP and ZC. Any future housing development of five (5) units or more in the multifamily residential, or MX zones will continue to require a Site Development Permit, necessitating environmental impacts evaluation including impacts to tribal cultural resources. In addition, at the time of any future development, the Health and Safety Code Section 7050.5 will apply and will require that a project follow the protocol when human remains are found on a construction site. Therefore, the proposed Project would not cause additional direct or indirect impacts to Tribal Cultural Resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resource, or a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.19 Utilities and Service Systems

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated for residential and commercial development that allows housing. There is no development proposed with the updates to the GP and ZC, and no new construction of wastewater, storm water or water facilities. Any future housing development of five (5) units or more in the multifamily residential, or MX zones will require a Site Development Permit necessitating environmental impacts evaluation including impacts to wastewater treatment facilities. The County is legally obligated to identify sites but not required to propose development. County ministerial and discretionary processes also require any future proposed development to coordinate with Utility and Service Providers to confirm sufficient capacity of to serve the proposed development. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wastewater treatment facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the construction of new or expansion of existing water or wastewater treatment facilities that were not previously analyzed in IS/ND No. IP 22-0133.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the construction of new or expansion of existing storm water drainage facilities that were not previously analyzed in IS/ND No. IP 22-0133.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the sufficiency of water supplies that were not previously analyzed in IS/ND No. IP 22-0133.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the capacity of wastewater treatment providers that were not previously analyzed in IS/ND No. IP 22-0133.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed with the updates to the GP and ZC, and therefore no new or expanded demand on landfill services. Therefore, the proposed Project would not cause additional direct or indirect impacts related to landfill capacity that were not previously analyzed in the IS/ND No. IP 22-0133

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. The County is legally obligated to identify sites but not required to propose development. The proposed Project does not conflict with policies and regulations for solid waste facilities. Therefore, the proposed Project would not cause additional direct or indirect impacts related to policies and regulations regarding solid waste that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.20 Wildfire

a. Substantially impair an adopted emergency response plan or emergency evacuation plan.

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to developed, urbanized areas that provide fire protection services and have Building and Safety Code requirements for the proper development of public and private structures and facilities. The proposed

updates to the GP and ZC do not disrupt any emergency evacuation plans and do not create additional fire risks, because the proposed Project does not include development. The proposed Project includes updates to the Safety Element to ensure consistency and safety provisions for the proposed rezone of the RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones. There is no development proposed with the updates to the GP and ZC. The County is legally obligated to identify sites but not required to propose development. In addition, the proposed Project area does not include parcels that are located in identified Fire Hazard Severity Zones. Any future proposed development in Fire Hazard Severity Zones will continue to follow the County's policies, regulations, discretionary and ministerial processes for safety and fire prevention. Therefore, the proposed Project would not cause additional direct or indirect impacts related to emergency response plans or emergency evacuation plans that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire. The proposed Project includes updates to the Safety Element to ensure consistency and safety provisions for the proposed rezones. There is no development proposed with the updates to the GP and ZC and therefore, the proposed Project will not expose occupants to pollutant concentrations from a wildfire. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wildfire, expose occupants to pollutant concentrations, or exacerbate fire risk that were not previously analyzed in the IS/ND No. IP 22-0133.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

See response to b) above. The proposed Project does not propose development; therefore, the proposed Project would not cause any additional direct or indirect impacts related to infrastructure that may exacerbate fire risk that were not previously analyzed in IS/ND No. IP 22-0133.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire, and includes only areas with no flood risk, reduced flood risks due to levees, or designated as areas with one percent annual chance of floods. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. As such, the proposed Project would not cause additional direct or indirect impacts related to wildfire or flooding that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.21 Mandatory Findings of Significance

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Consistent with Section 3.21 (Mandatory Findings of Significance) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed urbanized areas that are designated residential and commercial zones. The Project is a policy framework meant to address housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated for residential and commercial development, and which allow and authorize housing development. There is no development proposed as part of the updates to the GP and ZC. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density.

Response to Impact Question a): Refer to Section 4.2.4 – Biological Resources, Section 4.2.5 - Cultural Resources, and 4.2.18 – Tribal Cultural Resources. As discussed in these sections, the proposed Project would have no effect on fish or wildlife habitats or populations, plant or animal communities, protected species, or important examples of the major periods of California history or prehistory. Therefore, no impacts would not result from Project implementation that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Response to Impact Question b): There are no impacts resulting from this Project as analyzed in Sections 4.2.1 through 4.2.20 in this Addendum. Therefore, no cumulative impacts would occur, and the Project is not cumulatively considerable in a way not previously analyzed in the IS/ND No. IP 22-0133.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Response to Impact Question c): Sections 4.2.1 through 4.2.20 in this Addendum analyzed potential impacts and did not identify any impacts resulting from Project implementation. Therefore, no significant adverse effects on human beings, either directly or indirectly, have been identified and no impacts would result that were not previously analyzed in the IS/ND No. IP 22-0133.

Chapter 5: Conclusion

The proposed Project will support the County's 6th Cycle Housing Element Update and efforts to meet its housing needs requirements that were analyzed in the previously approved Initial Study/Negative Declaration (IS/ND) for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project (IP No. 22-0133). This Addendum documents minor changes to IS/ND No. IP 22-0133 for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project, which includes a rezone of RP and commercial zoning districts[4] to a new MX zone and rezoning of the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the base zoning designation or the Housing Opportunities Overlay.

IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone.

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed updates do not grant any land use entitlements, authorize development of any specific development project, or require any direct physical changes to land or existing development.

As noted above, these changes from the project studied in IS/ND IP No. 22-0133 do not result in any changes to any of the resource area conclusions in IS/ND IP No. 22-0133. The proposed Project rezones and establishes a minimum density in certain already developed parcels within unincorporated areas of Orange County. At some point in the future if theses parcels are redeveloped, they could have the potential to increase the number of dwelling units. However, at this time, meaningful environmental review cannot be conducted because there is no certainty that redevelopment will occur or to what degree any given parcel will be redeveloped. Planning review with OC Development Services/Planning would still be required for any new development proposed that includes five (5) units or more, even if that development is consistent with the amended GP Elements and Comprehensive ZC. Per the existing ZC, multifamily development projects of five (5) or more dwelling units are permitted subject to a Site Development Permit with a corresponding CEQA review and are reviewed by the Director of OC Development Services/Planning. This requirement would not change as part of the proposed Project. Therefore, the rezone of RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones are consistent with IS/ND No. IP 22-0133.

[4] The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

It was previously determined that there would be no impacts to any environmental resource area as demonstrated in IS/ND IP No. 22-0133. The updates proposed in this Addendum to the amendments would not result in any additional impacts not discussed and analyzed in IS/ND IP No. 22-0133. Based on the foregoing analysis and information, none of the conditions identified in California Environmental Quality Act Guidelines Section 15162 exist that would trigger the need to prepare another environmental documentation to evaluate project impacts or mitigation measures with regard to the proposed Project. Thus, the Addendum is the appropriate mechanism to update the analysis included in IS/ND IP No. 22-0133.

RESOLUTION OF THE BOARD OF SUPERVISORS OF
ORANGE COUNTY, CALIFORNIA
December 17, 2024

WHEREAS, the County of Orange has completed its Sixth Cycle Housing Element (2021-2029) (Exhibit A), as mandated by State law; and

WHEREAS, the California Department of Housing and Community Development (HCD) has determined the County's Sixth Cycle Housing Element to be substantially compliant with the requirements of State law (Exhibit B); and

WHEREAS, the Sixth Cycle Housing Element provides goals, policies, and objectives the County will pursue in order to meet its existing and projected housing needs for the Sixth Cycle (2021-2029 planning period), including a Land Inventory addressing the County's 10,406 unit allocation of the Regional Housing Needs Assessment (RHNA) assigned by Southern California Association of Governments (SCAG); and

WHEREAS, the Housing Element specifically (1) analyzes existing housing stock, projected housing needs, and availability of housing for special needs groups; (2) provides a Land Inventory (an inventory of land suitable for residential development); (3) identifies and analyzes potential and actual barriers to the construction of new housing units; and (4) identifies specific programs the County will undertake to achieve its stated goals and objectives; and

WHEREAS, the County's Land Inventory lists sites available for housing development during the Sixth Cycle Housing Element (2021-2029 planning period) and these sites are zoned to provide enough density to adequately accommodate the County's RHNA allocation of 10,406 new housing units at all income levels; and

WHEREAS, the Housing Element includes descriptions of the programs it will implement to ensure the housing needs of the Unincorporated area will be met during the Sixth Cycle 2021-2029 planning period, including how it will facilitate the construction of 10,406 new housing units; and

WHEREAS, previously-adopted amendments to the Land Use Element of the County's General Plan and Comprehensive Zoning Code, and Zone Changes to various parcels throughout the Unincorporated areas that will allow higher densities on sites designated for mixed-use and in high-density residential areas, will facilitate the development of affordable housing as outlined in the Housing Element; and

WHEREAS, in accordance with Government Code Section 65583.2, the County finds the existing uses on the sites identified in the Land Inventory to accommodate the lower income

RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the Sixth Cycle planning period; and

WHEREAS, the Deputy Director, OC Public Works, or designee, is hereby directed to submit the adopted County of Orange Sixth Cycle Housing Element, along with all necessary material, to HCD for its earliest action and certification as provided by law; and

WHEREAS, the Deputy Director, OC Public Works, or designee, is further directed and authorized to make all non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments requested by HCD to achieve a finding of substantial conformance with State Housing Element Law.

NOW, THEREFORE, BE IT RESOLVED THAT THIS BOARD:

1. Finds that Final Negative Declaration No. IP 22-0133 approved by the Board of Supervisors on September 27, 2022, and Addendum No. 1 to Negative Declaration No. IP 22-0133, approved by the Board of Supervisors on June 25, 2024 (Exhibit C), prepared for Housing-Related Updates to the County of Orange General Plan and Comprehensive Zoning Code, adequately address the effects of the Housing Related Updates, reflect the independent judgment of the County of Orange as lead agency and are approved for the proposed project based on the following additional findings:

    a. That the circumstances of the project are substantially the same and Negative Declaration No. IP 22-0133 and Addendum No. 1 to Negative Declaration No. IP 22-0133 adequately address the effects of the proposed project; no substantial changes have been made in the project.

    b. No substantial changes have occurred in the circumstances under which the project is being undertaken; and no new information of substantial importance to the project which was not known or could not have been known when the Negative Declaration No. IP 23-0133 and Addendum No. 1 to Negative Declaration No. IP 22-0133 were adopted has become known.

2. Finds that draft General Plan Amendment H20-01 (Housing Element), the County of Orange Sixth Cycle Housing Element (2021-2029), complies with all of the requirements set forth in Government Code Section 65583.

3. Finds that substantial evidence in the record, as described in detail in Appendix B of the Housing Element, and based on eight criteria (vacant/minimal improvements; existing uses that are typical for redevelopment projects in the

County; improvement/land value comparison; building/site condition; location; development demand for the identified sites; expressed interest from developers; and past residential and mixed-use development trends) demonstrates that the existing uses on the non-vacant sites identified in the site inventory to accommodate the County's lower income RHNA are likely to be discontinued during the planning period and or otherwise do not constitute an impediment to planned residential development on the site during the planning period.

4. Adopts General Plan Amendment H20-01 (Housing Element) as the County of Orange Sixth Cycle Housing Element (2021-2029).

Exhibit A County of Orange Sixth Cycle Housing Element (2021-2029) – Adopted November 2024
Exhibit B State HCD comment letter received on September 28, 2023
Exhibit C Final Negative Declaration No. IP 22-0133 and Addendum No. 1 to Negative Declaration No. IP 22-0133

DRAFT





County of Orange

Housing Element

2021 - 2029

ADOPTION DRAFT | NOVEMBER 2024



DRAFT – NOVEMBER 2024

COUNTY OF ORANGE
2021-2029
HOUSING ELEMENT

Table of Contents

1. INTRODUCTION 1

Purpose 1

Citizen Participation 2

Consistency with State Housing and Planning Law 2

General Plan Consistency 3

Housing Element Organization 4

2. COMMUNITY PROFILE 5

Population Trends and Characteristics 5

Employment Trends 10

Household Characteristics and Trends 15

Housing Inventory and Market Conditions 24

Housing Cost 33

Housing Needs 39

Overcrowding and Overpayment 40

County Programs to Encourage Development of Affordable Housing 45

Future Growth Needs 53

Special Housing Needs 55

3. CONSTRAINTS 82

Governmental Constraints 82

Development Processing Procedures 98

Non-Governmental Constraints 113

4. AFFIRMATIVELY FURTHERING FAIR HOUSING 123

Fair Housing Outreach and Enforcement Capacity 125

Analysis of Federal, State, and Local Data and Local Knowledge 130

Integration & Segregation Patterns & Trends Related to People With the Following Protected Characteristics and Lower Incomes 132

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) 153

Disparities in Access to Opportunity 156

Disproportionate Housing Needs and Displacement 175

Discussion of Site Inventory Related to People with Protected Characteristics, Lower Incomes, and Opportunity Areas 206

Summary of Fair Housing Issues/Assessment of Contributing Factors to Fair Housing 243

5. HOUSING ACTION PLAN 246

Strategies 247

Programs, Objectives, Responsible Agencies, Funding Sources 247

Summary of Quantified Objectives 284

APPENDIX A: EVALUATION OF THE 2013-2021 HOUSING ELEMENT A-1

APPENDIX B: LAND INVENTORY B-1

APPENDIX C: PUBLIC PARTICIPATION SUMMARY C-1

Glossary

The following terms are used throughout this document and include common geographical terms as well as general and planning terms:

Term or Abbreviation	Definition
Above moderate-income households	Households with an income that is 120% or more of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $153,351 or more for a four-person household, as calculated by HCD for 2023 (this is more than 120% of the $127,800 AMI for Orange County).
Accessory Dwelling Unit or "ADU"	A dwelling unit providing complete independent living facilities for one or more persons that is located on a parcel with another primary, single-family dwelling or multifamily use defined by Government Code section 65852.2, as may be amended. Must include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling's location. An accessory dwelling unit may be within the same structure as the primary unit, in an attached structure, or in a separate structure on the same parcel.
AFFH	Affirmatively Furthering Fair Housing – a legal requirement that federal agencies and federal grantees further the purposes of the federal Fair Housing Act. This term 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."
Affordable housing unit	A residential dwelling unit which shall be reserved for rent or sale to eligible households based upon housing cost and household income levels at extremely low-, very low-, low-, or moderate income as established by the California Department of Housing and Community Development (HCD) or U.S. Department of Housing and Urban Development (HUD).
AI	Orange County Analysis of Impediments to Fair Housing, 2020
AMI	Area Median Income – the median income for the County of Orange as a whole, unless otherwise limited in the document to Unincorporated Census Designated Places (CDPs) and other Unincorporated areas. The methodology for determining the AMI may be different between governmental entities so the AMI may be reported differently among tables.
Assisted Housing	Generally, refers to multifamily rental housing, but may sometimes include single-family owner-occupied units, whose construction, financing, sales price, or rent have been subsidized by federal, state, or local funding programs benefitting very low-, low-, or moderate-income households.
CDBG	Community Development Block Grants – A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitled communities, which allots money to cities and counties for housing rehabilitation and community development, including public facility and economic development.
Census Designated Place or "CDP"	Statistical equivalents of incorporated places representing Unincorporated communities that do not have a legally defined boundary that are designated by the U.S. Census Bureau. For purposes of this 6th Cycle Housing Element, the Unincorporated CDPs relevant to the County include Coto de Caza, Ladera Ranch, Las Flores, Midway City, Modjeska, North Tustin, Rancho Mission Viejo, Rossmoor, Silverado, Trabuco Canyon, and Williams CDPs. While these CDPs

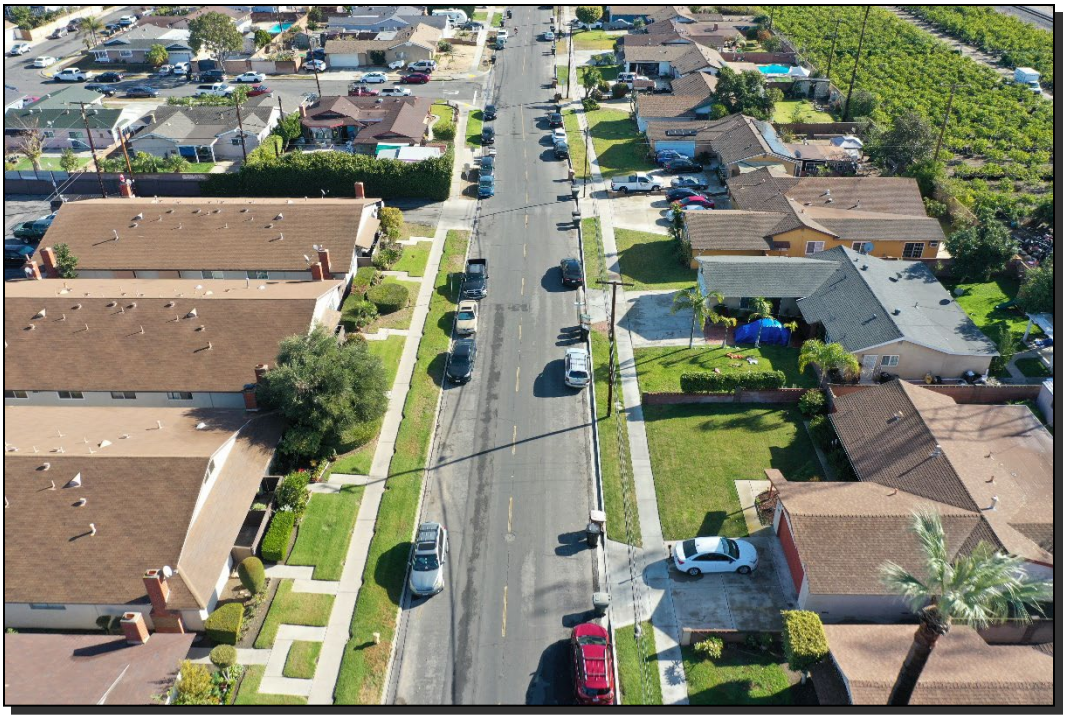
Term or Abbreviation	Definition
	do not make up the entire population of the Unincorporated areas, data from these CDPs was used when data for the entirety of the Unincorporated areas of the County was unavailable. In some instances, census tract data from El Modena, West Anaheim, Orange-Olive, and Stanton is also included because these locations are not part of any CDPs for Unincorporated Orange County, but adding such data provides a more complete data set.
CHAS	The Comprehensive Housing Affordability Strategy data compiled by the U.S. Department of Housing and Urban Development
Continuum of Care or "CoC"	The County's comprehensive regional strategy intended to address homelessness in Orange County, which covers the 34 incorporated jurisdictions, as well as the Unincorporated areas. The CoC is guided by a Board, with participation from County departments and agencies, local governments, homeless, housing, and supportive service providers, community groups, and many other stakeholders. The CoC serves as a means of regional coordination between the various stakeholders to better address homelessness issues on a community-wide level, advocates for funding and resources, provides funding for efforts to quickly rehouse people experiencing homelessness, promotes access to existing programs for homeless individuals and families, and promotes the implementation of best practices and evidence-based approaches to homeless programming and services.
County of Orange or "County"	Includes only Unincorporated Areas of Orange County. The Goals, Strategies, and Actions in the Housing Action Plan apply only to the County.
Density	The amount of development per acre permitted on a parcel under the applicable zoning (inclusive of any overlay zoning), commonly measured as dwelling units per acre (du/ac). Where the County's Housing Opportunities Overlay permits a higher residential density than would otherwise be allowed, the density specified by the Housing Opportunities Overlay governs.
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, generally in exchange for meeting certain requirements (e.g., specified percentage of affordable housing).
Dwelling Unit or "DU"	One or more rooms designed, occupied, or intended for occupancy as separate living quarters
Emergency Shelter	As defined by Section 50801 of the California Health and Safety Code, as may be amended, housing with minimal supportive services for persons experiencing homelessness that is limited to occupancy of one-hundred eighty consecutive days or less and from which no individual or household may be denied emergency shelter because of an inability to pay. This classification includes facilities that provide temporary shelter, meals, showers, and other related services to persons experiencing homelessness and where on-site supervision is provided whenever the shelter is occupied.
Extremely low-income households	Households with an income that is between 15% and 30% or less of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $43,050 for a four-person household, as calculated by HCD for 2023 (this is 30% of the $127,800 AMI for Orange County).
Fair Market Rent	The rent, including utility allowances, determined by the U.S. Department of Housing and Urban Development (HUD) for the purpose of administering the Section 8 Housing Assistance Program.
General Plan	A comprehensive, long-term plan mandated by State Planning Law for the development of a city or county and any land outside its jurisdictional

Term or Abbreviation	Definition
	boundaries, which, in the local jurisdiction's judgment, bears relation to its planning. General Plans consist of seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. General Plans include a statement of development policies for the jurisdiction and serves as a guiding document for development decisions.
HCD	California Department of Housing and Community Development – The State agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of low- and moderate-income households.
Household	Includes all people occupying a single dwelling unit. A household also means all people occupying two dwelling units on the same site if both units are used as group homes owned or operated by the same operator.
Housing Opportunities Overlay or "HOO"	A zoning overlay district within the County that provides for the development of affordable rental housing within commercial and/or industrial districts, and on building sites zoned for high density residential uses, and for the establishment of emergency shelters, multi-service centers and low-barrier navigation centers. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning, so long as all housing units are reserved for households which earn eighty percent or less of the County median income, and seventy percent of the units are reserved for low-income-households and thirty percent of the units are reserved for very low-income households.
HUD	U.S. Department of Housing and Urban Development – The Federal department that administers housing and community development programs nationwide.
Jobs-Housing Balance	A ratio that describes the adequacy of the housing supply within a defined area in terms of meeting the needs of persons who work within the same defined area.
Junior Accessory Dwelling Unit or "JADU"	Pursuant to Government Code Section 65852.22, as may be amended, a junior accessory dwelling unit means a unit that is no more than five hundred (500) square feet in size and contained entirely within an existing or proposed single-family dwelling unit. A junior accessory dwelling unit shall include an efficiency kitchen (sink, cooking appliance, food preparation counter, and storage cabinets) and may include separate sanitation facilities, or may share sanitation facilities with the existing structure
Low-income households	Households with an income that is between 51% and 80% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For the Orange County, this income limit is $114,800 for a four-person household, as calculated by HCD for 2023 (this is approximately 80% of the $127,800 AMI for Orange County).
Median Family Income or "MFI"	Median Family Income as calculated for the relevant area by the U.S. Department of Housing and Urban Development (HUD) for each jurisdiction, to determine the Fair Market Rents and income limits for HUD programs. MFI is not necessarily the same as other calculations of median incomes (e.g., a simple census number) due to a series of adjustments that are made by HUD.
Mixed-Use	A development that combines both residential and non-residential uses on the same lot.
Moderate-income households	Households with an income that is between 81% and 120% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $153,350 for a four-person household, as calculated by HCD for 2023 (this is 120% of the $127,800 AMI for Orange County).

Term or Abbreviation	Definition
Multifamily building	A detached building designed and used exclusively as a dwelling by three or more households occupying separate dwelling units.
Multifamily dwelling	Two (2) or more dwelling units within a single building or within two (2) or more buildings on the same site or lot. Types of multifamily dwellings include garden apartments, senior citizen housing developments, apartments, and condominium buildings.
OCTA	Orange County Transportation Authority, the regional transportation authority for planning and operation of transportation and transit within Orange County.
OCHFT	Orange County Housing Finance Trust – a joint powers authority between the County and multiple incorporated cities for the purpose of funding housing that specifically aims to address the needs of the homeless population, and extremely low-, very low-, and low-income households within Orange County.
Ordinance	A law or regulation set forth and adopted by the County's Board of Supervisors. These are generally codified into the County's Codified Ordinances after adoption.
Overcrowded Housing Unit	A housing unit which is occupied by more than one person per room, as defined by the U.S Census Bureau.
Overlay	A regulatory tool that creates a special zoning district, placed over an existing base zoning district. The regulations applicable to the overlay can either supplement or override the regulations for the base zoning district, and its boundaries can either share common boundaries with the base zoning district or cut across base zoning district.
Parcel	A lot or tract of land
Planning Area	The area addressed by a General Plan. For the County's purposes, the Planning Area for this 6th Cycle Housing Element encompasses all of the Unincorporated areas within the County's jurisdictional limits.
RCOC	Regional Center of Orange County, a nonprofit organization contracted by the State to coordinate lifelong services and support for individuals with developmental disabilities and their families.
Regional	Pertaining to activities at a scale greater than that of a single jurisdiction and affecting a broader geographic area.
Regional Housing Needs Assessment or "RHNA"	A quantification by the local council of governments of existing and projected housing need, by household income group, for all localities within a region.
R/ECAP	Racially or Ethnically Concentrated Areas of Poverty
Residential Zoning	Land designated in the General Plan and Zoning Ordinance as allowing for the development of residential uses, including the residential uses authorized by the Housing Opportunities Overlay zone.
SCAG	Southern California Association of Governments – the regional council of governments responsible for allocating the RHNA quantification to individual jurisdictions within the region.
Single-family Dwelling	A dwelling unit designed for occupancy by one household that is located on a single lot. May either be detached (meaning that the lot does not contain any other dwelling unit except for an accessory dwelling unit or junior accessory dwelling unit where permitted and is not connected to another dwelling unit) or attached (meaning that it shares a common wall with another single-family dwelling).

Term or Abbreviation	Definition
Supportive Housing	Housing with no limit on length of stay, that is occupied by the target population for the housing as identified by the provider, 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. Supportive housing may be provided in single-family dwelling, multifamily dwelling units, residential care facilities, or boarding house uses.
Tenure	This refers to the type of occupancy for a given dwelling unit – that is, whether it is owner-occupied or renter-occupied. Dwelling units that are not owner occupied and are either rented for cash rent or occupied without payment of cash rent are classified as renter occupied.
Transitional Housing	As defined by Government Code section 65582, as may be amended, dwelling units with a limited length of stay that are operated under program requirements that require the termination of assistance and recirculation of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six (6) months from the beginning of the assistance. Transitional housing projects may be designated for homeless or recently homeless individuals or families transitioning to permanent housing. Transitional housing may be provided in a variety of residential housing types including single-family and multifamily dwellings.
Unincorporated CDPs	The pre-2020 CDPs that comprise the majority of the Unincorporated areas include Coto de Caza, Ladera Ranch, Las Flores, Midway City, North Tustin, and Rossmoor. While these CDPs do not comprise the entirety of the Unincorporated areas, data from these CDPs was used where data for the entirety of the Unincorporated areas was unavailable. In 2020, five new CDPs were created in the Unincorporated areas: Modjeska, Rancho Mission Viejo, Silverado, Trabuco Canyon, and Williams Canyon. Data from these new CDPs were included when appropriate.
Very low-income households	Households with an income that is between 31% and 50% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For the Orange County, this income limit is $71,750 for a four-person household, as calculated by HCD for 2023 (this is 50% of the $127,800 AMI for Orange County).
Zoning Ordinance or Zoning Code	The Comprehensive Zoning Code of the County of Orange, including zoning district maps and planned community or specific plan development plan maps and texts adopted pursuant to or as an amendment to Orange County Codified Ordinances sections 7-9-25.1, 7-9-47, 7-9-132, and 7-9-133. The Zoning Code is contained in Orange County Codified Ordinances sections 7-9-19 through 7-9-713.

1. INTRODUCTION



Purpose

The purpose of the Housing Element is to ensure the County establishes policies, procedures, and incentives in its land use planning and development activities that will result in the maintenance and expansion of the housing supply to adequately accommodate households current and future population living and expected to live in the Unincorporated County. It institutes policies that will guide County decision-making and establishes an action program to implement housing goals through 2029.

Each jurisdiction within the Southern California Association of Governments (SCAG) region is required to adopt its 2021-2029 Housing Element by October 15, 2021. Although some County housing programs operate within cities, the County's Housing Element primarily addresses housing issues in the Unincorporated County areas. Foremost among these issues is the provision of a mix of housing types to meet the needs of all economic segments of the Unincorporated County areas. In response, the Housing Element makes provisions for affordable and accessible housing for special needs groups in the community and is designed to provide guidance in the maintenance of existing affordable housing. These commitments are an expression of the statewide housing goal of "decent housing and a suitable living environment for every California family."

Citizen Participation

The *California Government Code* requires that local government make a diligent effort to achieve public participation from all economic segments of the community in the development of the Housing Element. In the preparation of the Housing Element Update, a number of organizations and agencies that provide housing, or housing related services, were contacted. Responses from these groups helped guide the Housing Needs Assessment portion of the Housing Element, as well as the Housing Action Plan.

Citizen involvement was accomplished in a number of different ways. Meetings were held with the County Housing Element Resource Team comprised of recognized leaders from business, housing advocacy, social service providers, non-profit organizations, the Building Industry Association, major landowners and developers, and non-profit builders. The Draft Housing Element was posted on the County's website to facilitate public access and comments. (https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2). Community workshops were hosted by OC Development Services, and public hearings were held by the Orange County Planning Commission and Board of Supervisors. Additionally, prior to submitting to the California Department of Housing and Community Development (HCD), the County made the Draft Housing Element available for a 30-day public review and comment period. Following the 30-day public review and comment period, the County utilized a 10-day period to review and incorporate any necessary changes to the document. This proactive outreach effort ensured broad involvement throughout the analytical and policy development phases of the project.

For subsequent draft revisions, the draft revision was made available on the County website and an email with a link to the document was sent to all individuals and organizations that previously requested notices relating to the County's Housing Element at least seven days prior to submitting the draft revision to HCD.

Appendix C provides additional detail regarding opportunities for public involvement along with a summary of public comments and how those comments have been addressed in the Housing Element.

Consistency with State Housing and Planning Law

The Housing Element is one of the seven General Plan elements mandated by the State of California. Sections 65580 to 65590 of the *California Government Code* contain the legislative mandate for the housing element. State law requires that the County's Housing Element consist of "*an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement and development of housing*" (§65583). In addition, the housing element shall identify adequate sites for housing, including rental housing, factory-built housing,

and mobile homes, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

There is no single approved format for a Housing Element. Instead, State law defines components of issues that must be addressed. A Housing Element should clearly identify and address, at a minimum, each component listed below:

The Housing Element shall contain all of the following.

1. Review of existing Housing Element.
2. An assessment of existing and projected housing and employment trends to assess a locality's housing needs for all income levels.
3. An inventory of resources relevant to meeting housing needs.
4. An inventory of constraints relevant to the meeting of these needs.
5. A statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing.

A program that sets forth an eight-year schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element.

General Plan Consistency

The Housing Element is one of nine elements of the Orange County General Plan. The goals, policies, standards, and proposals within this Element relate directly to, and are consistent with all other Elements. The County's Housing Element identifies programs and resources required for the preservation, improvement, and development of housing to meet the existing and projected needs of its population.

The Housing Element is affected by development policies contained in the Land Use Element, which establishes the location, type, intensity, and distribution of land uses throughout the County, and defines the land use build-out potential. In designating the location and density of residential development, the Land Use Element places an upper limit on the number and types of housing units constructed in the Unincorporated County. The acreage designated for a range of commercial and office uses creates employment opportunities for various income groups. The presence and potential for jobs affect the current and future demand for housing at various income levels in the County.

The Public Services and Facilities Element, Resources Element, Safety Element, and Noise Element of the General Plan also affect the implementation of the Housing Element. Together, these Elements establish policies for providing essential infrastructure to all housing units, regulate the amount and variety of open space and recreation areas, delineate acceptable noise levels in residential areas, and establish programs to provide for the safety of the residents. In

sum, policies contained in General Plan Elements directly affect the quality of life for all Unincorporated County citizens.

The Eight-Year Housing Action Plan contained in Section 5 (Housing Action Plan) includes the County's commitments for implementation actions through October 2029.

Housing Element Organization

The Housing Element is comprised of the following major components:

- The Community Profile and Needs Assessment (Section 2) contains an overview of the county's population, housing, and employment characteristics in the context of regional trends, as well as a discussion of existing and future housing needs, including special needs such as the elderly and large families, and the Unincorporated County areas' fair share of regional growth needs.
- Section 3 contains a review of housing constraints and resources, including governmental and market constraints to the maintenance, improvement, and development of housing.
- Section 4 contains a review of Affirmatively Fair Housing and disparities in access to opportunity within incorporated and Unincorporated areas of Orange County.
- The goals, policies, and programs that will guide the County's actions through 2029 are presented in Section 5.
- Appendix A presents a review of the previous Housing Element, including a discussion of the appropriateness of goals and policies, the effectiveness of programs, and the progress in achieving quantified objectives.
- Appendix B presents an analysis and inventory of suitable sites for housing development compared to the jurisdiction's assigned share of the region's housing need.
- Engagement efforts including community workshops, meetings, online and digital outreach, and public hearings are discussed in Appendix C.

2. COMMUNITY PROFILE

The County of Orange is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. A somewhat rectangular landmass, Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles. Unincorporated Orange County represents only a small fragment of the total population of Orange County. The population of the Unincorporated County areas was only 128,421 in 2020, representing less than 5% of the population of Orange County as a whole.

The housing needs of the County are determined by demographic characteristics of the population (age, household size, employment, and/or ethnicity), and the characteristics of housing available to that population (e.g., number of units, tenure, size, cost). The regional housing market is seldom static, constantly changing with dynamic social and economic factors. As County demographics and household socioeconomic conditions change, different housing opportunities arise and/or must be created to meet demand. This section explores the characteristics of the existing and projected population and housing stock in order to define the extent of unmet housing needs in the Unincorporated County. This information helps to provide direction in updating the County's Housing Element goals, policies, and programs.

Population Trends and Characteristics

Between 2000 and 2020, Orange County as a whole, grew by over 348,000 people, or approximately 12%. During this same time period, the population of the Unincorporated County areas declined by about 23.6% to 128,421 persons (**Table 2-1**) due to incorporations and annexations of approximately 20% of Unincorporated land.

Table 2-1
Population Trends 2000-2020

Jurisdiction	2000	2010	2020	Growth 2000 to 2020	
Aliso Viejo	0	47,816	50,351	50,351	5%
Anaheim	328,014	336,265	357,059	29,045	9%
Brea	35,410	39,182	45,498	10,088	28%
Buena Park	77,962	80,520	82,336	4,374	6%
Costa Mesa	108,724	109,960	113,667	4,943	5%
Cypress	46,549	47,802	49,055	2,506	5%
Dana Point	35,110	33,351	33,466	-1,644	-5%
Fountain Valley	54,978	55,313	55,419	441	1%
Fullerton	126,003	135,222	142,070	16,067	13%
Garden Grove	165,196	170,794	173,457	8,261	5%
Huntington Beach	189,627	189,992	198,725	9,098	5%
Irvine	143,072	212,375	277,988	134,916	94%
Laguna Beach	23,727	22,723	22,690	-1,037	-4%
Laguna Hills	29,891	30,270	31,397	1,506	5%
Laguna Niguel	61,891	62,979	64,559	2,668	4%
Laguna Woods	17,794	16,273	16,209	-1,585	-9%
La Habra	58,974	60,223	63,471	4,497	8%
Lake Forest	58,707	77,395	84,556	25,849	44%
La Palma	15,408	15,568	15,607	199	1%
Los Alamitos	11,536	11,449	11,602	66	1%
Mission Viejo	93,102	93,174	95,130	2,028	2%
Newport Beach	70,032	85,186	86,415	16,383	23%
Orange	128,868	136,386	139,504	10,636	8%
Placentia	46,488	50,598	51,569	5,081	11%
Rancho Santa Margarita	47,214	47,853	48,708	1,494	3%
San Clemente	49,936	63,522	64,538	14,602	29%
San Juan Capistrano	33,826	34,593	36,081	2,255	7%
Santa Ana	337,977	324,647	331,304	-6,673	-2%
Seal Beach	24,157	24,168	24,711	554	2%
Stanton	37,403	38,186	39,150	1,747	5%
Tustin	67,504	75,540	80,511	13,007	19%
Villa Park	5,952	5,812	5,821	-131	-2%
Westminster	88,207	89,701	91,931	3,724	4%
Yorba Linda	58,918	64,234	68,426	9,508	16%

Table 2-1
Population Trends 2000-2020

Jurisdiction	2000	2010	2020	Growth 2000 to 2020	
Unincorporated Areas	168,132	121,160	127,510	-40,622	-24%
County Total	2,846,289	3,010,232	3,180,491	334202	12%

**California State Department of Finance, E-4 Report, 2001-2010, with 2000 & 2010 Census Counts*
***California State Department of Finance, E-5 Report, 2011-2020, with 2010 Benchmark*

Most cities within Orange County generally experienced some growth, though not exponential, between 2000 and 2020. However, within the Unincorporated County areas the population shrunk by nearly a quarter because annexations and incorporations physically shrunk the size of the Unincorporated County areas over that period, pulling the population of those annexed and incorporated areas into neighboring jurisdictions. The Board of Supervisors Policy Platform includes policy direction to County staff to encourage annexation of Unincorporated islands. This created higher population growth in neighboring jurisdictions over the last twenty years. The Unincorporated County area's population shrank as a percentage of the total population of Orange County from 2000 to 2020, decreasing from approximately 5.9% of the overall population of Orange County as a whole to approximately 4% of the overall population of Orange County. This decrease in population both in terms of total numbers and in terms of a percentage of the total population of Orange County mirrors the decrease in the Unincorporated County areas' land area during the same period and reflects a trend of both decreasing jurisdictional area for the County and decreasing population within the Unincorporated County areas due to annexations and other factors.

Age Composition

The age breakdown of a population is an important factor in evaluating housing needs and projecting the direction of future housing development. According to the 2010 and 2021 American Community Survey (ACS) data shown in **Table 2-2**, residents in their prime working years (20-64) comprised about 57% of the population of the Unincorporated County areas in 2010, shrinking just slightly to comprise about 56.5% of the population of the Unincorporated County areas in 2021. About 13.9% of residents were "senior citizens" age 65 and older in 2010, with this number growing to encompass approximately 14.3% of the population in the Unincorporated County areas in 2021. This demonstrates an aging population, in line with the trends observed in Orange County as a whole. The median age of persons living in census designated places in Orange County increased between 2010 to 2019, except for the Las Flores Census Designated Place (CDP), which decreased by about 1% (**Table 2-3**). The median age in most Unincorporated CDPs increased between 2010 and 2020, with the largest increases in median age observed in the Coto de Caza CDP (increasing from 42.2 to 46.2) and North Tustin CDP (increasing from 45.6 to 48.6). The Trabuco Canyon, Coto de Caza, North Tustin,

Silverado, and Rossmoor CDPs are the Unincorporated County areas with the highest median age, with the Ranch Mission Viejo, Las Flores, and Ladera Ranch CDPs having the lowest median age. As a whole, the median age in Orange County increased from 36.2 to 37.8 between 2010 to 2020. During the 2010-to-2021-time frame, residents between 0 and 5 years of age demonstrated the largest amount of growth for CDPs within the Unincorporated County areas. Additionally, the percentage of the population falling between the ages of 5 and 49 decreased slightly between 2010 and 2021. This indicates that families residing within the Unincorporated County areas have grown over the last decade, with adults over the age of 50 and children under the age of 5 representing growing segments of the population. In line with these population trends, there is growth in demand for housing suitable for larger family units (that is, multi-bedroom units and/or single-family residences) and multi-generational housing.

Table 2-2
Age Distribution - Unincorporated Census Designated Places (CDPs)

Years	Under 5 years	5 to 19 years	20 to 34 years	35 to 49 years	50-64 Years	65 years +
2010	4.8%	24.5%	11.5%	24.5%	21%	13.9%
2015	5.4%	21.4%	14.1%	20.5%	23.1%	15.7%
2021	6.1%	23.2%	13.1%	21.4%	22%	14.3%

Source: American Community Survey, 5-year Estimates, 2010, 2015, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area

Table 2-3
Median Age by Unincorporated Census Designation Places (CDPs)

Census Designated Place (CDP)	2010	2020
Orange County	36.2	38.3
Coto de Caza CDP	42.2	46.2
Ladera Ranch CDP	32.4	35.2
Las Flores CDP	33.2	32.1
Midway City CDP	37.1	40.3
Modjeska CDP	N/A	38.3
North Tustin CDP	45.6	48.6
Rancho Mission Viejo CDP	N/A	35.2
Rossmoor CDP	45.5	47.5
Silverado CDP	N/A	54.1
Trabuco Canyon CDP	N/A	51
Williams Canyon CDP	N/A	37.6

Source: American Community Survey, 5-Year Estimates, 2019, 2020.
Note: Median age data available for Unincorporated CDPs only, not entire Unincorporated County area.
Note: Modjeska, Rancho Mission Viejo, Silverado, Trabuco Canyon, and Williams Canyon became CDPs in 2020.

Racial and Ethnic Composition

Table 2-4 shows a comparison from 2010 to 2020 of racial and ethnic characteristics for Orange County as a whole, while **Table 2-5** shows a comparison from 2010 to 2020 of racial and ethnic characteristics for the Unincorporated County.

Table 2-4
Racial and Ethnic Breakdown for Orange County
Comparison 2010 and 2020

	White	Hispanic or Latino of Any Race	Asian	Two or More Races	Black	Native Hawaiian and Pacific Islander	American Indian/ Alaska Native	Some Other Race	Total Population
2010	1,328,499	1,012,973	532,477	72,117	44,000	8,357	6,216	5,593	3,010,232
2020	1,198,655	1,086,834	699,124	125,242	49,304	7,714	5,298	14,818	3,186,989
Change	-129,844	73,861	166,647	53,125	5,304	-643	-918	9,225	176,757
% Change 2010 to 2020	-9.80%	7.3%	31.30%	74%	12.1%	-7.7%	-14.8%	165%	5.9%

Source: U.S. Census Bureau, 2010 and 2020 Public Law 94-171 Summary Files. Errata not included.

Table 2-5
Racial and Ethnic Breakdown for Unincorporated Orange County
Comparison 2010 and 2020

	White	Hispanic or Latino of Any Race	Asian	Two or More Races	Black	Native Hawaiian and Pacific Islander	American Indian/ Alaska Native	Some Other Race	Total Population
2010	75,535	25,333	15,034	3,301	1,170	293	279	215	121,160
2020	73,595	29,195	20,936	6,792	1,364	235	200	560	132,877
Change	-1,940	3,862	5,902	3,491	194	-58	-79	345	11,717
% Change 2010 to 2020	-2.6%	15.2%	39.3%	106%	17%	-20%	-28.3%	160%	9.7%

Source: U.S. Census Bureau, 2010 and 2020 Public Law 94-171 Summary Files. Errata not included.

As **Tables 2-4** and **2-5** demonstrate, since 2010, the County's housing needs have become more complex as the population has become more diverse. Population data suggests a growing demand for senior housing, along with programs to assist lower-income seniors who wish to "age in place" by adapting their homes to their housing needs. Moreover, population data suggests a more diverse Orange County as a whole, which in turn, likely requires more diverse housing options.

Employment Trends

Current employment and projected job growth have a significant influence on housing needs during this planning period. **Table 2-6** shows that about 65.6% of working-age persons in the entire County were in the workforce, with a similar number of persons in the workforce in Unincorporated CDPs, as reported by 2019 American Community Survey estimates. About 6% of Orange County and Unincorporated CDP residents worked at home, and 34% were not in the labor force (i.e., unemployed, or not seeking work). However, the number of residents working from home has changed since 2019 most likely due to the 2020 pandemic.

Table 2-6
Labor Force – Unincorporated CDPs and Orange County

	Unincorporated CDPs						Orange County					
	2010		2019		2021		2010		2019		2021	
	Persons	%	Persons	%	Persons*	%	Persons	%	Persons	%	Persons	%
In labor force	40,140	65.7%	45,172	64.4%	52,907	65.6%	1,559,264	67.3%	1,671,054	65.6%	1,690,622	65.8%
-Work at home	2,859	4.7%	4,401	6.3%	9,375	11.6%	66,404	2.9%	99,736	3.9%	191,060	7.4%
Not in labor force	20,932	34.3%	24,934	35.6%	27,793	34.4%	756,518	32.7%	877,328	34.4%	877,148	34.2%
-With social security income	6,335	10.4%	7,513	10.7%	9,095	11.3%	227,427	9.8%	278,565	10.9%	285,401	11.1%
Total Population age 16+	61,072	100%	70,106	100%	80,700	100%	2,315,782	100%	2,548,382	100%	2,567,770	100%

Source: American Community Survey, 5 year estimate, 2010, 2019, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.
**Increase in number of persons due to additional CDPs created in 2020.*

In 2022, the Orange County Transportation Authority (OCTA) released the results of an *Employment and Travel Tracking Survey* intended to measure how the 2020 pandemic altered attitudes, working arrangements, travel behaviors, and preferred mode of trips. A baseline study was conducted in February and June 2020, and two tracking studies were conducted in September 2021 and September 2022. These studies did not differentiate between people residing in incorporated cities versus within the Unincorporated County areas, however, the trends observed are likely similar between both incorporated jurisdictions and the Unincorporated County areas. The key takeaways from the study are: 1) the pandemic had dramatic impacts on employment, working arrangements, and travel behavior, 2) Orange County has reached a new normal for remote work which doubled from pre-pandemic levels, and 3) travel and activity patterns stabilized between August 2021 and 2022.
During the early months of the pandemic:

- Unemployment increased from 4% to 18% between February and June 2020.
- Working exclusively from home increased from 12% to 47%.
- Working from home increased from .76 days/week to 2.56 days/week.

By September 2022:

- The percentage working from home 1 or more days/week settled in at 43%, an increase from 23% in February 2022.
- The average number of days working from home (1.49) is double pre-pandemic levels (.76).
- With the decline in remote work from the early months of the pandemic, the percentage of employees driving alone to work increased from 60% in September 2021 to 69% in September 2022.

Link to the OCTA Survey:

https://blog.octa.net/posts/remote-work-in-orange-county-has-doubled-since-pandemic-says-survey/

Consistent with those findings, the Unincorporated County areas reported an increase in employed persons working from home in 2021, as compared to both 2010 and 2019.

In 2018, approximately 52.3% of the Unincorporated working residents were employed in management and professional occupations (**Table 2-7**). A significant number of workers (24.6%) were employed in sales and office related occupations. A relatively low proportion of workers (11.5%) were employed in service-related occupations. Blue collar occupations such as machine operators, assemblers, farming, transportation, handlers, and laborers constituted about 11.6% of the workforce. Numbers in Orange County as a whole are similar.

Table 2-7
Employment by Occupation

Occupation	Unincorporated Areas		Orange County		SCAG Region	
	Persons	%	Persons	%	Persons	%
Management, professional and related	32,503	52.3%	658,308	41.7%	2,616,827	34.2%
Service	7,146	11.5%	272,860	17.3%	1,500,551	19.6%
Sales and office	15,294	24.6%	373,300	23.7%	1,743,617	22.8%
Construction, extraction, and maintenance	2,560	4.1%	101,631	6.4%	675,894	8.8%
Production, transportation, and material moving	4,623	7.5%	171,980	10.9%	1,118,977	14.6%
Total Employment	62,126	100%	1,578,079	100%	7,655,866	100%

Source: American Community Survey, 5-Year Estimate, 2018

Table 2-8
Average Annual Salary by Sector
Unincorporated Areas and Orange County – 2009 and 2017

Occupation	2009		2017	
	Unincorporated Areas In $ (Thousands)	Orange County In $ (Thousands)	Unincorporated Areas In $ (Thousands)	Orange County In $ (Thousands)
Agriculture	$32	$32	$45	$48
Construction	$58	$58	$59	$73
Manufacturing	$39	$37	$73	$77
Wholesale	$74	$71	$93	$86
Retail	$36	$35	$34	$37
Information	$78	$75	$95	$107
Finance-Insurance-Real Estate	$77	$74	$81	$105
Profession-Management	$78	$76	$81	$73
Education-Health	$47	$47	$58	$54
Leisure-Hospitality	$21	$21	$24	$26
Public Administration	$52	$54	$40	$88
Other Services	$32	$32	$31	$38
Non-Classified	$48	$48	N/A	N/A
Average	$52	$51	$57	$63

Source: California Employment Development Department, 2009, 2017

Table 2-8 demonstrates that the average annual salary by sector has increased since 2009 in most sectors in both Unincorporated County areas and Orange County as a whole. Between 2009 and 2017, many sectors experienced increases in annual salary of greater than 25% and some up to 43%.

Future housing needs are affected by the number and type of new jobs created during this planning period. **Table 2-9** shows projected job growth by industry for the Santa Ana-Anaheim-Irvine Metropolitan Statistical Area (MSA) (Orange County) for the period 2018-2028. Labor market information used to identify total employment and employment growth trends within the County is generated for geographic units called metropolitan statistical areas, the MSA covers the same geographic areas as the County. Using the data provided by the State Employment Development Department, total employment in Orange County is expected to grow by 7.2% between 2018 and 2028. The overall growth is expected to add 126,300 new jobs and bring the employment of Orange County to over 1,890,000 by 2028.

Generally, residents who are employed in well-paying occupations have less difficulty obtaining adequate housing than residents in low paying occupations. **Table 2-9** illustrates the growth

trend in low-wage service industries such as health care and social assistance, and accommodation and food services.

Table 2-9
Projected Job Growth by Industry – 2018-2028
Santa Ana-Anaheim-Irvine Metropolitan Statistical Area

Industry Title	Annual Average Employment		Employment Change	
	2018	2028	Jobs	%
Total Employment	1,764,000	1,890,300	126,300	7.2
Self-Employment (A)	109,100	117,300	8,200	7.5
Unpaid Family Workers (B)	--	--	--	--
Private Household Workers (C)	1,700	1,600	(100)	-5.9
Total Farm	2000	1900	(100)	-5.0
Total Nonfarm	1,651,200	1,769,500	118,300	7.2
Mining and Logging	500	400	(100)	-20.0
Construction	106,300	113,000	6,700	6.3
Manufacturing	160,700	156,900	(3,800)	-2.4
Trade, Transportation, and Utilities	261,600	270,800	9,200	3.5
Wholesale Trade	79,800	81,400	1,600	2.0
Retail Trade	152,600	156,000	3,400	2.2
Transportation, Warehousing, and Utilities	29,200	33,400	4,200	14.4
Transportation and Warehousing	26,200	30,200	4,000	15.3
Information	26,700	29,700	3,000	11.2
Financial Activities	118,700	126,100	7,400	6.2
Finance and Insurance	79,300	84,300	5,000	6.3
Real Estate and Rental and Leasing	39,400	41,800	2,400	6.1
Professional and Business Services	317,000	346,500	29,500	9.3
Management of Companies and Enterprises	36,700	38,700	2,000	5.4
Admin/Support and Waste Mgmt & Remediation	151,300	163,600	12,300	8.1
Education Svcs, Health Care, and Social Assistance	224,700	263,600	38,900	17.3
Educational Services (Private)	29,300	33,900	4,600	15.7
Health Care and Social Assistance	195,400	229,700	34,300	17.6
Leisure and Hospitality	222,600	242,200	19,600	8.8
Arts, Entertainment, and Recreation	51,000	56,500	5,500	10.8
Accommodation and Food Services	171,700	185,700	14,000	8.2
Other Svcs (excludes Private Household Workers)	51,400	53,700	2,300	4.5
Government	161,200	166,600	5,400	3.3
Federal Government	11,100	11,200	100	0.9

Table 2-9
Projected Job Growth by Industry – 2018-2028
Santa Ana-Anaheim-Irvine Metropolitan Statistical Area

Industry Title	Annual Average Employment		Employment Change	
	2018	2028	Jobs	%
State and Local Government	150,200	155,400	5,200	3.5
State Government	32,000	33,900	1,900	5.9
Local Government	118,200	121,500	3,300	2.8

Source: California Employment Development Department, April 2021
Industry detail may not add up to totals due to independent rounding
(A) Self-Employed persons work for profit or fees in their own business, profession, trade, or farm. Only the Unincorporated self-employed are included in this category. The estimated and projected employment numbers include all workers who are primarily self-employed and wage and salary workers who hold a secondary job as a self-employed worker.
(B) Unpaid family workers are those persons who work without pay for 15 or more hours per week on a farm or in a business operated by a member of the household to whom they are related by birth or marriage.
(C) Private Household Workers are employed as domestic workers whose primary activities are to maintain the household.
Industry employment is based on the Quarterly Census of Employment and Wages (QCEW) program.

The employment trends indicate that there continues to be a need for moderate- and lower-income housing to support the housing needs of persons in the service and sales industries, including the educational sector, health care sector, entertainment sector, and transportation sector. The demand for affordable homes and apartments is likely to remain very high, while the supply is likely to remain tight. Many of the jobs projected to be generated in the MSA through the year 2028 are expected to be in the educational, health care, entertainment, and transportation sectors.

Table 2-10
Average Travel Time to Work (Minutes)

	Unincorporated Areas	Orange County
2019	29	28
2010	31	25.9
2000	29.8	27.2

Source: SCAG Local Profiles Dataset, 2021

As shown in **Table 2-10,** above, the average travel time to work in the Unincorporated County areas remained relatively consistent from 2000 to 2019 – decreasing by only an eighth of a minute overall. This is consistent with the average travel time to work throughout Orange County, which increased by an eighth of a minute between 2000 and 2019. While travel time to work remains slightly higher on average in the Unincorporated County areas than in Orange County as a whole, the difference is negligible (one minute) and demonstrates that there is a relatively good match between housing and employment opportunities.

Household Characteristics and Trends

To understand current housing concerns and anticipated future needs, housing occupancy characteristics need to be identified. The following is an analysis of household size and income characteristics. As defined within the County's Zoning Code, "a household includes all people occupying a single dwelling unit. A household shall also mean all people occupying two (2) dwelling units on the same site if both units are used as group homes owned or operated by the same operator" (section 7-9-95.1).

Household Composition and Size

As shown by **Table 2-11,** in Unincorporated Orange County, the average annual change in total households between 2010 and 2019, increased by 0.98%, while in Orange County as a whole, the percent change was lower. Most households within Orange County and in Unincorporated CDPs are comprised of family households, with non-family households and householders living alone representing a growing number of the total households between 2010 and 2019. In 2019, 83.4% of households in Unincorporated CDPs and 70% of households in Orange County consisted of families, and about 35.6% in Unincorporated CDPs and 31% in Orange County had school-age children. In comparison, in 2010, family households with school-age children were about 12% and 3% higher, respectively. All other household types remained about the same between these 9 years. About 21% of Orange County households were a single person living alone, compared to 13.2% in Unincorporated CDPs (**Table 2-12**).

Table 2-11
Unincorporated CDPs Household Composition 2010-2019

Household Type	2010		2019		Average Annual % Change
	Households	% of Total Households	Households	% of Total Households	
Total households	27,376	100%	29,938	100%	0.98%
Family households	22,525	82.3%	24,969	83.4%	1.21%
-with own children under 18	10,733	47.6%	10,644	35.6%	-0.092%
Non-family households	4,851	17.7%	4,969	16.6%	0.27%
-Householder living alone	3,645	13.3%	3,975	13.2%	3.02%
Average household size	3.42	--	3.45	--	-

Source: American Community Survey, 5-Year Estimates, 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 2-12
Orange County Household Composition 2010-2019

Household Type	2010		2019		Average Annual % Change
	Households	% of Total Households	Households	% of Total Households	
Total households	992,781	100%	1,037,492	100%	0.5%
Family households	708,491	71.4%	744,011	71.7%	0.55%
-with own children under 18	335,587	33.8%	320,601	30.9%	-0.49%
Non-family households	284,290	28.6%	293,481	28.3%	0.36%
-Householder living alone	207,849	20.9%	218,835	21.1%	0.59%
Average household size	2.99	–	3.01	–	–

Source: Census 2010, Summary File 1- General Population and Housing Characteristics- Demographic Profile 1, American Community Survey, 5-Year Estimates, 2019

In many respects there are notable differences between renter and owner households. According to the 2019 American Community Survey data, over 18% of Unincorporated renter households consisted of one person living alone, a significantly higher proportion than for owners (12%). Large households of 5 or more were more prevalent among renters (15.86%) than owners (14.5%). **Table 2-13** describes household size distribution by tenure.

Table 2-13
Household Size by Tenure (Owner vs. Renter)
Unincorporated Orange County

Household Size	Owners		Renters	
	Households	%	Households	%
1 person households	3,878	12.0%	1708	18.3%
2 person households	11,293	35.0%	2457	26.3%
3 person households	5,734	17.8%	2,055	22.0%
4 person households	6,716	20.8%	1656	17.7%
5 person households	2,985	9.3%	918	9.8%
6 person households	1018	3.2%	355	3.8%
7+ person households	639	2.0%	205	2.2%
Total households	32,263	100%	9,354	100%

Source: American Community Survey, 2014-2018, 5-Year Estimates

Tenure

Table 2-14 shows tenure (owner vs. renter) for the Unincorporated County areas compared to Orange County as a whole. According to the 2018 American Community Survey, 78.4% of housing units in the Unincorporated County areas were owner-occupied, compared to 57.4% countywide. Renters in the Unincorporated County account for 48.3% of households with 2 to 3 persons according to **Table 2-13**. Thus, it appears that there may be fewer rental units (non-

owner occupied) in the Unincorporated County areas, which could result in less availability of rentals, and thus, fewer more affordable options in the Unincorporated County areas.

Table 2-14
Household Tenure (Owner vs. Renter)

Tenure	Unincorporated Areas		Orange County	
	Units	%	Units	%
Owner occupied	33,267	78.4%	592,269	57.4%
Renter occupied	9,166	21.6%	440,104	42.6%
Total occupied units	42,433	100%	1,032,373	100%

Source: American Community Survey 2014-2018, 5-Year Estimates

Households with children may require different or additional design standards and are often larger to accommodate additional persons to avoid overcrowding and displacement. **Table 2-15** displays household types for Unincorporated County areas, Orange County, and the State. Amongst the three jurisdictions, households categorized as "family" made up the largest percent of households overall. Unincorporated County areas and Orange County have a higher percentage of family households than the state. Family households with children represent the same percentage for Orange County as the State and represent larger percentages than non-family households.

Table 2-15
Population by Familial Status

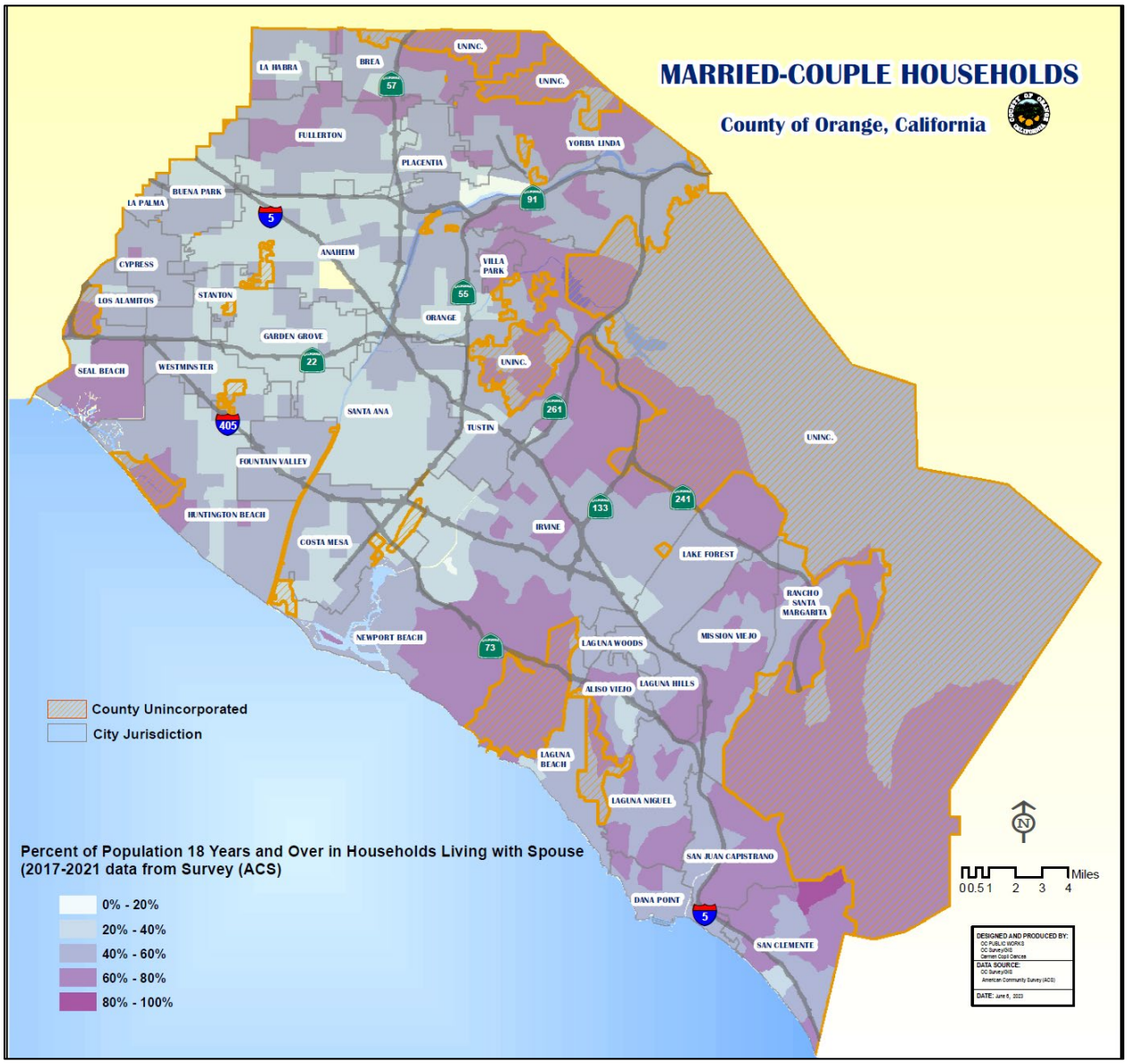
Familial Status	Unincorporated CDPs	Orange County	California
Family Households	83.4%	71.7%	68.7%
Married-Couple Family Households	70.7%	54.9%	49.8%
With Related Children Under 18	35.6%	34.1%	34%
Female Households, No Spouse	9.4%	11.5%	13%
Non-Family Households	16.6%	28.3%	31.3%
Households with One or More People 60 Years+	39.8%	39.9%	39.1%
Total Households	**29,938**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Additionally, **Figures 2-1** through **2-4** below show household type and familial status geographically across Orange County. As the maps demonstrate, the coastal, south Orange County and inland/foothills areas have the highest concentrations of married households and married households with children. The central areas of the County have greater percentages of unmarried and/or female only headed households. As **Table 2-15** demonstrates, the percentage

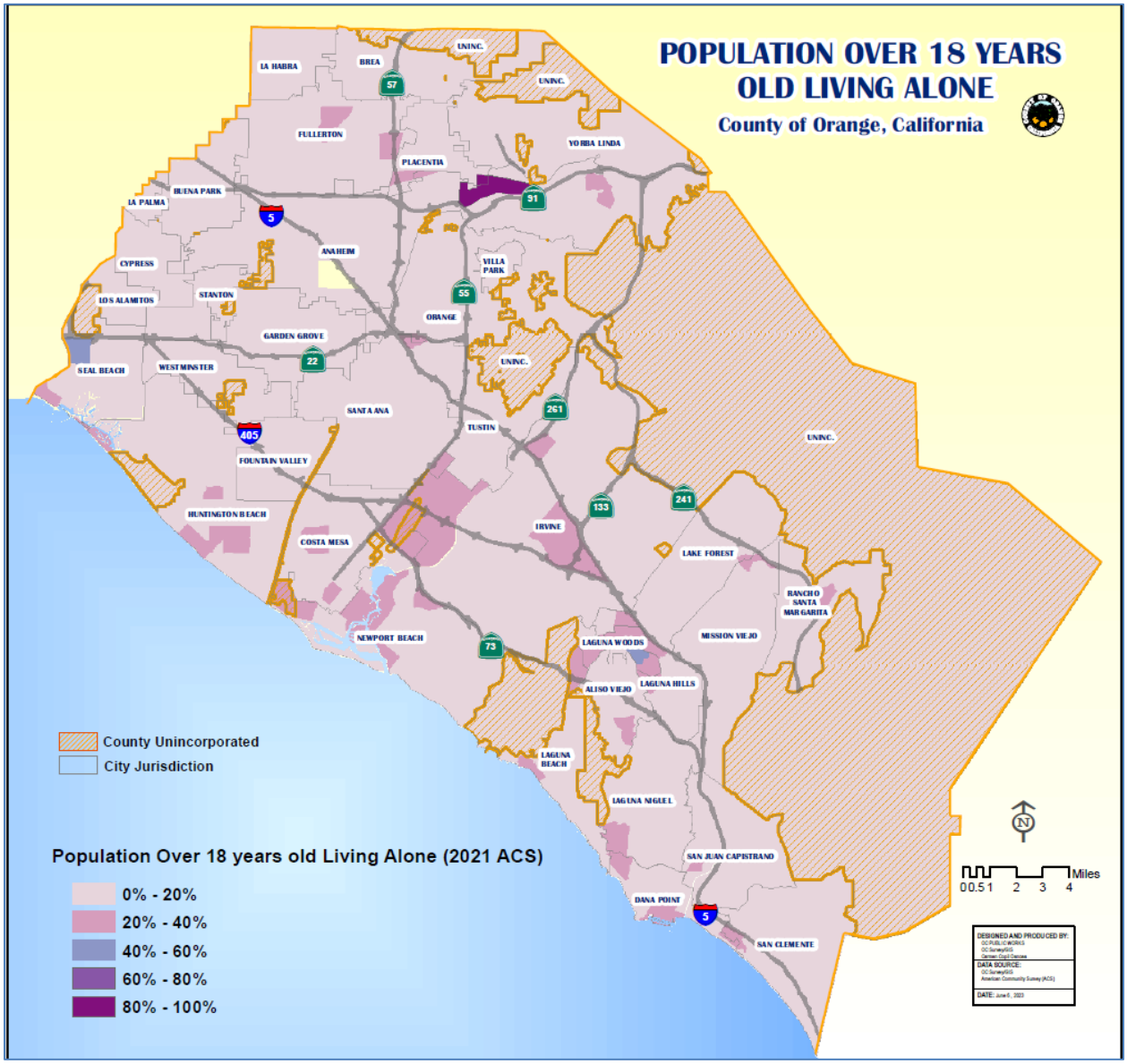
of family households in Orange County exceeds the State percentage. Consistent with these trends, as shown in **Figures 2-1** through **2-4,** the Unincorporated "islands" in the more central parts of Orange County have a higher concentration of unmarried and/or female only headed households, while the Unincorporated County areas in more coastal areas and in inland/foothill areas have high concentrations of married households and married households with children. The Unincorporated "islands" in central areas of Orange County also generally correspond with areas that have higher rates of renters versus homeowners.

Figure 2-1
Married-Couple Households



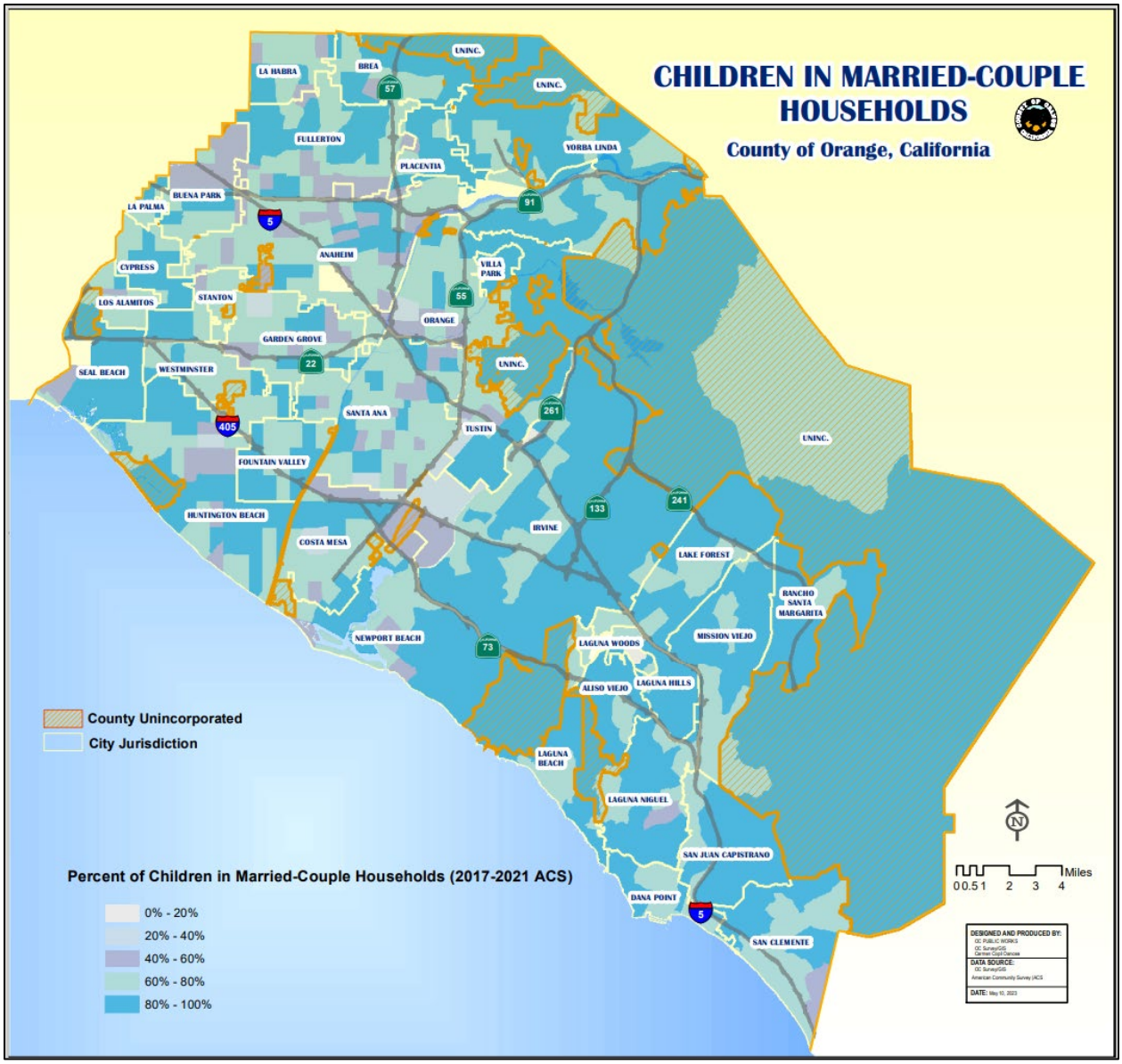
Source: HCD AFFH Data Viewer, 2022

Figure 2-2
Population Over 18 Years Living Alone



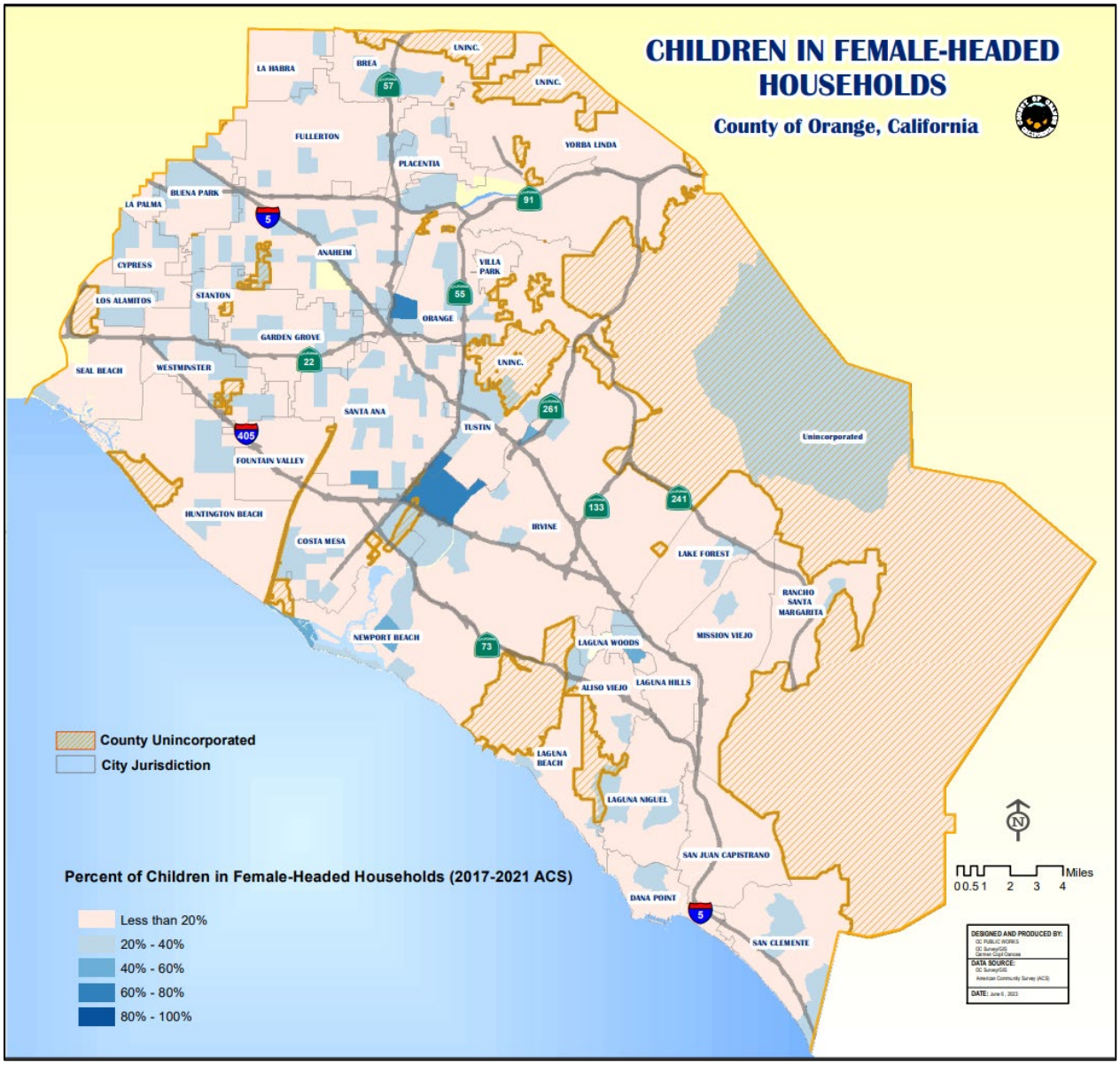
Source: HCD AFFH Data Viewer, 2022

Figure 2-3
Children in Married-Couple Households



Source: HCD AFFH Data Viewer, 2022.

Figure 2-4
Children in Female-Headed Households



Source: HCD AFFH Data Viewer, 2022

Household Income

Household income is a primary factor affecting housing needs in a community. According to the 2021 Census estimates, the median household income in Orange County was $100,485, approximately 16.3% higher than the statewide median income of $84,097 (**Table 2-16**). The table also shows the income differences between different areas of the county. The Coto de Caza and Ladera Ranch Census Designated Places (CDPs), both of which are part of Unincorporated Orange County, had the highest incomes while the Midway City CDP, also a part of Unincorporated Orange County, area was lowest.

Table 2-16
Median Household Income

Jurisdiction	Median Household Income	% of County Median Income
California	$84,097	84%
Orange County	**$100,485**	**100%**
Coto de Caza CDP	$210,990	210%
Ladera Ranch CDP	$169,706	169%
Las Flores CDP	$147,404	147%
Midway City CDP	$48,323	48%
Modjeska CDP	$103,967	103%
North Tustin CDP	$157,487	157%
Rancho Mission Viejo CDP	$152,989	152%
Rossmoor CDP	$153,750	153%
Silverado CDP	$90,938	90%
Trabuco Canyon CDP	$164,417	164%
Williams Canyon CDP	N/A	N/A
El Modena Area (Approx. Avg. Median)	$110,667	110%
Orange-Olive Area (Approx. Avg. Median)	$129,636	129%
Stanton Area (Approx. Avg. Median)	$70,360	70%
West Anaheim Area (Approx. Avg. Median)	$71,866	72%

Source: American Community Survey, 5-Year Estimates, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

As shown in **Table 2-16**, there are no areas of extremely low-income households in Unincorporated Orange County. The Midway City CDP is an area of Unincorporated Orange County with a median income in the very low-income range. In addition, the El Modena and West Anaheim and Stanton census tracts have an average median income in the low-income range. The remainder of Unincorporated County areas are either moderate- or above-moderate-income.

While there are pockets of high AMI households (above-moderate-income households) throughout Orange County, including Unincorporated County areas, there are also pockets of very low- and low-income households. This indicates that the demand for affordable homes and apartments is likely to remain high, while supply is likely to remain tight. As shown in **Table 2-22**, in the Unincorporated County areas, there are 9 ongoing housing projects in various stages of development which are anticipated to provide more than 705 total housing units. However, the demand for rental units – apartments, condominiums, and single-family homes – is likely to remain strong in the future, particularly in the more central areas of Orange County and in the Unincorporated "islands" in those areas, where the percentage of renters is higher than the percentage of owners.

Housing Inventory and Market Conditions

This section summarizes the housing inventory in the Unincorporated County and prevailing market conditions.

Age and Condition of Housing Stock

Age is one measure of housing stock conditions and a factor for determining the need for rehabilitation. Without proper maintenance, housing units deteriorate over time. Thus, units that are older are more likely to need major repairs (e.g., a new roof or plumbing). As a general principle, houses 30 years or older are considered aged and are more likely to require moderate to major repairs. In addition, older houses may not be built to current standards for fire and earthquake safety. According to 2019 American Community Survey data, about 72.9% of owner-occupied units and 53% of rental units in the Unincorporated County areas were built before 1990 and are approximately 30 years old or greater (**Table 2-17**); 41.5% are 60 years or older. This compares to 87% of units in Orange County as a whole, which were built before 1990 and 37.1% which were built before 1960.

Table 2-17
Age of Housing Stock

Year Built	Unincorporated Areas		Orange County	
	Units	%	Units	%
2014 to present	1,612	3.8%	29,369	2.7%
2010-2013	806	1.9%	22,261	2.0%
2000-2009	9,081	21.4%	91,455	8.3%
1990-1999	6,323	14.9%	128,774	11.7%
1980-1989	2,928	6.9%	163,803	14.9%
1970-1979	4,074	9.6%	256,739	23.3%
1960-1969	6,959	16.4%	214,045	19.5%
1950-1959	8,784	20.7%	143,431	13.0%
1940-1949	721	1.7%	23,121	2.1%
1939 and earlier	1,146	2.7%	27,451	2.5%
Total Units	**42,433**	**100%**	**1,100,449**	**100%**
Source: American Community Survey, 5-Year Estimates, 2019				

As reported in recent Census estimates, only 0.1% of owner-occupied units and 1.1% of rental units in the Unincorporated County areas lacked complete kitchen facilities while 0.2% of owner-occupied units and 1.3% of rental units lacked complete plumbing facilities countywide (**Table 2-18**). There may also be units that require rehabilitation or replacement despite possessing complete kitchen and plumbing facilities.

Table 2-18
Kitchen and Plumbing Facilities

	Unincorporated Areas		Orange County	
	Units	%	Units	%
No Telephone Service Available	424	1.00%	21,459	1.95%
Lacking Plumbing Facilities	144	0.34%	4,292	0.39%
Lacking Complete Kitchen Facilities	424	1.00%	14,196	1.29%
Source: American Community Survey 2005-2019, SCAG Local Housing Data Pre-Certified Local Housing Data 2020				

To determine the condition of the housing stock, the County conducted a recent assessment of code enforcement complaints within Unincorporated Orange County. **Table 2-19** summarizes the results of the assessment.

Table 2-19
Housing Rehabilitation Need –
Unincorporated Orange County – 2019-2020

Unincorporated Areas	Number of Property Maintenance Complaints in 2020	Number of Property Maintenance Complaints in 2019
Anaheim Island	72	54
Costa Mesa Islands	2	5
Coto De Caza	1	6
Foothill/Trabuco	1	5
Ladera Ranch	8	2
Las Flores	N/A	1
Midway City	76	30
North Tustin	69	146
Orange Park Acres	23	42
Placentia Islands	3	4
Rancho Mission Viejo	4	2
Rossmoor	18	34
Silverado-Modjeska	16	17
Yorba Linda Islands	1	10
Source: OC Public Works 2020		

Based on the assessment of recent property maintenance complaints in 2019 and 2020, most of the concerns are located in the Anaheim Islands, Midway City, North Tustin, and Orange Park Acres. The complaints vary from the collection of junk and debris, lack of yard maintenance, storage of inoperable vehicles, unpermitted buildings, and animals/insects. Approximately 29 of the 300 total Unincorporated properties with maintenance complaints in 2020 are noted as having unpermitted or substandard units; therefore approximately 1% of the total units with identified property maintenance complaints may need to be replaced or rehabilitated.

Overall, the housing stock in the Unincorporated County areas is in good condition, despite the fact that the vast majority of homes are 20 or more years old. Only a small minority of the housing stock requires replacement or serious rehabilitation, indicating that housing maintenance or repair is not a major concern or contributing factor for housing needs within the Unincorporated County.

Housing Stock Profile

Table 2-20 summarizes the distribution of housing by type in the Unincorporated portions of Orange County as of 2020. Throughout the Unincorporated County, single-family detached (SFD) units characterize the most abundant housing type (75.2%); larger multifamily projects of

five or more units represent 10.3% of the stock; and single-family attached units, such as condominiums, represent 11% of the total housing.

Looking at the change from 2000 to 2020, **Table 2-20** shows the housing stock of the Unincorporated County areas has decreased by about 30.62% due to annexations and incorporations. The County of Orange lost 168 Unincorporated acres due to annexations since 2014. The Unincorporated County areas have shrunk significantly since 2014, with a 9.5% decrease in acreage from 176,553 acres to 176,385 acres.

Table 2-20
Housing by Type

Structure Type	2000		2020		Growth	
	Units	%	Units	%	Units	%
Unincorporated Areas						
Single-family detached	38,725	63%	31,909	75.2%	-6,816	-17.6%
Single-family attached	9,438	15%	4,674	11%	-4,764	-50.48%
Multifamily 2-4 units	2,530	4%	862	2%	-1,668	-65.9%
Multifamily 5+ units	9,925	16%	4,356	10.3%	-5,569	-56.1%
Mobile homes	543	1%	632	1.5%	89	16.4%
Total Units	61,161	100%	42,433	100%	-18,728	-30.62%
Orange County						
Single-family detached	489,657	51%	556,760	50.1%	-67,103	-13.7%
Single-family attached	124,702	13%	132,709	12%	8,007	6.4%
Multifamily 2-4 units	88,804	9%	94,718	8.5%	5,914	6.6%
Multifamily 5+ units	233,871	24%	293,712	26.4%	59,841	25.6%
Mobile homes	32,450	3%	33,522	3%	1,072	3.3%
Total Units	969,484	100%	1,111,421	100%	141,937	14.6%
Source: California Department of Finance, Table E-5, 2020						

Single-family detached houses continue to represent the largest proportion of the existing housing stock within the Unincorporated County areas, which is consistent with the housing stock trends in Orange County as a whole. This trend also reflects the fact that the majority of Unincorporated County areas are concentrated in the coastal and foothill areas of the County, which generally reflect a higher percentage of people who own their homes as opposed to rent, while the more central areas of Orange County have both a higher concentration of multifamily units and a higher percentage of people who rent.

Despite the loss of acreage and associated housing units to incorporations and annexations, single-family attached homes, and multifamily developments of five or more units represent the second and third largest proportions of the existing housing stock, respectively, within the Unincorporated County areas. These trends are on par with the trends within Orange County as a

whole; however, the Unincorporated County areas have a smaller overall number and percentage of multifamily developments than the larger County. Where Orange County's overall housing stock in 2020 was comprised of approximately 26.4% multifamily developments with five or more units, the Unincorporated County areas' total housing stock was comprised of 10.3% multifamily developments with five or more units. This indicates that there is a demand for multifamily developments that is likely to remain and to potentially grow, in addition to the continued demand for single-family housing. While the demand is high, the existing stock of both single-family housing and multifamily housing remains tight.

Residential Construction Trends

The majority of residential construction within the Unincorporated areas is occurring within the Ranch Plan Planned Community, which includes a mix of residential housing types. At full build out, the Ranch Plan Planned Community is approved to have 14,000 dwelling units, including both single-family attached and detached residences, as well as multifamily developments of various sizes. Since 2019, Planning Area 3.1 of the Ranch Plan Planned Community has been fully permitted and will ultimately accommodate 775 residential dwelling uses as well as 120,000 square feet of Senior Living Facility uses. Planning Areas 3 and 4 are still being permitted, but at ultimate build out will include an additional 7,500 dwelling uses. This planned development represents the largest residential construction that is planned within the Unincorporated areas, concentrated towards the southern end of the Unincorporated areas. Planning Area 3.2a was issued certificates of occupancy in January 2023 and includes 145 deed-restricted senior housing (Age Qualified) and 134 market-rate, for sale units. Planning Area 3.2b has been approved with six neighborhood builders for a total of 514 units.

Beyond the Ranch Plan Planned Community, there are smaller residential developments planned in other portions of the Unincorporated areas. Together, these smaller planned developments total approximately 145 dwelling units, with 95 of those units being part of a planned, dedicated senior-living facility. **Tables B-14** in Appendix B show the affordable housing developments that have occurred within the Housing Opportunities Overlay Zone. Below, **Table 2-21** shows the residential developments in the Unincorporated areas that have been completed since 2015. In addition, **Table 2-22** shows the pending housing developments for the Unincorporated areas, including a breakdown by the types of units permitted.

Table 2-21
Completed Housing Units
Unincorporated Orange County (2015 – Current)

	Single-Family	2-4 units	5+ Units	ADUs	Total
2015	164	0	270	2	436
2016	494	0	37	7	538
2017	710	0	56	14	780
2018	470	6	339	5	820
2019	347	2	0	8	357
2020	105	108	0	11	224
2021	100	3	0	34	137
2022	232	15	83	38	368
2023	109	0	0	10	119

Source: OC Development Services, May 2023

Table 2-22
Pending Housing Developments - Unincorporated Orange County

Development Name	Number Units	Type of Units	Price Range	Status
Saddlecrest	65	Single-Family Development	Above Moderate	Under construction (2024); Expected completion: 2026
Cielo Vista	80	Single-Family Development	Above Moderate	Under construction (2024); Expected completion: 2026
Esperanza Hills Specific Plan	340	Single-Family Development	Above Moderate	Approved, processing permits; Expected completion: 2028
Wass Condo	10	Condo	Above Moderate	Approved; Expected completion: 2026
Cowan Heights Estates	16	Single-Family Development	Above Moderate	Under construction (2024); Expected completion: 2026
American Family Housing	65	Affordable Multifamily Development	Lower Income	Approved; Expected completion: 2026

Source: OC Development Services, November 2024

As a whole, the pending housing developments within the Unincorporated areas, along with the affordable housing developments within the Housing Opportunities Overlay Zone show a trend towards the development of additional housing within the limited area available for such development in the Unincorporated area. However, as the pending housing developments included in **Table 2-22** demonstrate, the majority of pending housing developments are generally

geared towards above-moderate-income households. On average, since 2015, 420 units per year were constructed within the Unincorporated areas, with a total of 3,779 units constructed since 2015. 785 of the units constructed since 2015 (approximately 21% of the total units) are housing units within large multifamily complexes containing structures with five or more units, while 134 of the units constructed since 2015 (approximately 4% of the total units) are 2-to-4-unit developments, and 2,731 units are single-family units (approximately 72% of the total units). The remaining 3 % of the units developed since 2015 (129 units) consist of accessory dwelling units or junior accessory dwelling units located on existing residential properties.

Of the currently pending residential developments, totaling 705 units, 27 % (or 191 units) are in condominium or multifamily unit developments with ten or more total units each. The remaining 73 % of the currently pending housing developments are single-family units. This trend in pending developments is consistent with the residential development that has occurred over the past decade within the Unincorporated areas. As indicated by **Table 2-16,** the Midway City and Las Flores CDPs that are within the Unincorporated County, likely need additional low and/or very low-income housing. Additionally, as indicated by **Tables 2-21 and 2-22,** there is likely to remain a need for additional multifamily developments and for additional low- and very low-income housing within the Unincorporated areas, while supply is likely to remain tight if existing trends continue. SCAG's local profile for the Unincorporated areas reveals that only 3.9% of the total households in Orange County reside in the Unincorporated areas (as of 2018), but retained a higher number of total residential units permitted per 1,000 residents than in Orange County as a whole (4.7 permits per 1,000 residents in the Unincorporated areas versus 2.5 permits per 1,000 residents in Orange County as a whole) as of 2018. *(Source: SCAG Profile of Unincorporated Orange County, Local Profiles Report, 2019.)*

Vacancy Rates and Trends

Vacancy trends in housing are analyzed using a "vacancy rate" which establishes the relationship between housing supply and demand. The vacancy rate is an indicator of the general availability of housing. It also reflects how well available units meet the current housing market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high vacancy rate may indicate either an imbalance between household characteristics and the type of available units, an oversupply of housing, or special situations such as in areas where there are vacation homes.

The availability of vacant housing units provides households with choices on different unit types to accommodate changing needs (e.g., single persons, newly married couples, and elderly households typically need smaller units than households with school age children). A low vacancy rate may contribute to higher market rents and prices and may limit the choices of households in finding adequate housing. It may also be related to overcrowding, as discussed later.

Table 2-23 provides 2019 American Community Survey occupancy and tenure characteristics for the Unincorporated areas compared to Orange County as a whole. Owner occupied housing units in Unincorporated areas represented 77.5% of all occupied housing units, whereas those in Orange County as a whole represented a lower 57.4% indicating a higher rate of rental units outside of the Unincorporated areas. The data indicated a 11.8% rental vacancy rate in the Unincorporated areas and a 26.3% rental vacancy rate in Orange County as a whole. These figures indicate a strong real estate market with a relatively low vacancy rate– at the lowest in Unincorporated areas (3.8%) as compared to Orange County as a whole (5.7%).

Table 2-23
Housing Vacancy

	Unincorporated Areas		Orange County	
	Units	**%**	**Units**	**%**
Total housing units	42,433	100%	1,100,449	100%
Occupied units	40,804	96.2%	1,037,492	94.3%
-Owner occupied	31,623	77.5%	595,272	57.4%
-Renter occupied	9,181	22.5%	442,220	42.6%
Vacant units	1,629	3.8%	62,957	5.7%
-For rent	192	11.8%	16,547	26.3%
-For sale	456	28.0%	6,124	9.7%
-Rented or sold, not occupied	401	24.6%	9,492	15.1%
-For seasonal or occasional use	363	22.3%	18,865	30%
-All other vacancies	218	13.4%	11,929	19%

Source: American Community Survey, 5-Year Estimates, 2019; SCAG Pre-Certified Local Housing Data 2020

According to the American Community Survey's 2019 data and SCAG Local Housing Data for 2020, there were approximately 1,629 total units considered vacant in the 2019-2020 timeframe, with approximately 22.3% of those units reserved for seasonal or occasional use, and an additional 24.6% of the total vacant units being rented or sold but unoccupied. The information in **Table 2-23** indicates that there is a high demand for rental units, but low vacancy. Similarly, there is a high demand for sale units, but low vacancy, though the vacancy rate applicable to for sale units is higher than rental units (28% as compared to 11.8%). The combined effect of these vacancy rates indicates that there is a demand for rental units and a slightly lower demand for units available for purchase, but insufficient supply to meet either of those demands, potentially contributing to issues with affordability for available housing.

Housing Units At-Risk of Conversion

Housing units that are at-risk of conversion are those multifamily, rental housing complexes that receive government assistance under any of the federal, state, and/or local housing assistance,

including any combination of rental assistance, mortgage insurance, interest reductions and/or direct loan programs, and which are eligible to convert to market rate units within 10 years of the beginning of the housing element planning period. In other words, at-risk units are only those that receive some kind of governmental assistance and do not include those which are considered affordable, but which receive no governmental assistance. There is a risk that such units will be converted to market-rate (less or not affordable) units when a rent subsidy contract expires or is terminated, or when restrictions on the units associated with governmental assistance programs expire. Within Unincorporated Orange County, there are no units anticipated to be at-risk during the planning period. Whenever units receiving governmental assistance near the end of their contracts to receive governmental assistance, OC Community Resources attempts to negotiate either a new contract or an extension of the existing contract to ensure that the units remain available and are not converted to market rate housing. OC Community Resources will continue to do so throughout the planning period as part of the County's efforts to address regional housing need.

Housing Units Demolished or Converted in the Coastal Zone

State law requires that coastal jurisdictions monitor and report the number of low-and moderate-income ("L/M") housing units within the Coastal Zone that are constructed or lost due to demolition or conversion to non-residential uses since 1982.

The amount of Unincorporated territory within the Coastal Zone has decreased considerably since 1982 due to the incorporation of Dana Point and Laguna Niguel as well as annexations to the Cities of Laguna Beach, Newport Beach, and Huntington Beach. The only major Unincorporated County area with residential development in the Coastal Zone is Emerald Bay. Bolsa Chica, Laguna Coast Wilderness Park, Aliso-Wood Canyon Regional Park, and Banning Ranch are the other major Unincorporated County coastal areas. **Table 2-24** shows the number of Low/Moderate income housing units constructed, demolished, converted, and replaced within the Coastal Zone since 1982.

- A total of 33 units were demolished or converted between 1982 and 1988, but the income category of these units was not recorded.
- Between 1989 and 2000, 15 units were demolished and replaced, including several in Emerald Bay which were demolished as a result of fire damage during the devastating fires that occurred in October 1993. The income category for these 15 units was not recorded. No units were converted from residential to non-residential use during this time.
- From 2001 through 2012, 262 units were demolished, including 221 units in a mobile home park.

- From 2012 to 2020, 23 units were demolished. The income category of these units is unknown.

Table 2-24
Low- and Moderate- Income Units Constructed, Converted, Demolished, and Replaced in the Coastal Zone – 1982-2020

Time Period	Units Constructed	Units Demolished	Units Converted	Units Replaced
1982-1988	1278[b]	29[a]	4[a]	N/A
1989-2000	0	15[a]	0	15 [a]
2001-2012	77[a]	262[a]	0	N/A
2012-2020	27	23	0	N/A
Total	1382[a]	329[a]	4[a]	15[a]

Notes:
a. Numbers reflect total units, not just Low/Moderate units. Specific income category not available
b. Numbers reflect only Low/Moderate units.
Source: Orange County, OC Public Works, OC Development Services, 2020

Housing stock within the Coastal Zone has remained limited since 1982 and has become more so as coastal areas have been incorporated or annexed to cities. However, the construction of 1,382 housing units, 1,278 of which fall within the Low/Moderate category, has increased the total housing stock within the Coastal Zone since 1982 notwithstanding the approximately 329 demolished units and 4 converted units. In total, since 1982, 1,068 units have been constructed in the Coastal Zone – less the units that have been demolished and converted since 1982.

Housing Cost

Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the AMI: extremely low (30% or less of AMI), very low (31-50% of AMI), low (51-80% of AMI), moderate (81-120% of AMI) and above-moderate (over 120% of AMI). Housing affordability is based on the relationship between household income and housing expenses. According to the U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development[1] (HCD), housing is considered "affordable" if the monthly payment is no more than 30% of a household's gross income. In some areas (such as Orange County), these income limits may be increased to adjust for high housing costs.

[1] HCD memo of 2/25/2013 (http://www.hcd.ca.gov/hpd/hrc/rep/state/inc2k13.pdf)

Table 2-25 shows 2023 affordable rent levels and estimated affordable purchase prices for housing in Orange County[2] by income category. Based on state-adopted standards, the maximum affordable monthly rental housing costs for a four-person acutely low-income household is $478, for a four-person extremely low-income household it is $1,076, while the maximum affordable housing costs for four-person very low-income households is $1,793. The maximum affordable housing cost for four-person low-income households is $2,870, and the maximum for four-person moderate-income households is $3,195.

Table 2-25
Income Categories and Affordable Housing Costs
Orange County

2023 County Median Income = $127,800*	Income Limits	Affordable Rent	Maximum Affordable Price (est.)
Acutely Low (<15%)	$19,150	$478	$58,030
Extremely Low (<30%)	$43,050	$1,076	$141,147
Very Low (31-50%)	$71,750	$1,793	$275,961
Low (51-80%)	$114,800	$2,870	$478,333
Moderate (81-120%)	$127,800	$3,195	$541,525

*Note: * As determined by California Department of Housing and Community Development*
Assumptions:
- Based on a family of 4
- 30% of gross income for rent or Principal/Interest/Taxes/Insurance
- 2023 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.
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

Maximum purchase prices are more difficult to determine due to variations in mortgage interest rates and qualifying procedures, down payments, special tax assessments, homeowner association fees, property insurance rates, etc. With this caveat, the maximum home purchase prices by income category shown in **Table 2-25** above have been estimated. For-Sale Housing Existing housing resale price statistics for calendar years 2000 to 2023, are shown in **Table 2-26**.

Table 2-26
Median Home Sales Price – Unincorporated Areas and Orange County

Year	Unincorporated Areas		Orange County	
	Price ($)	% Change	Price ($)	% Change
2000	519,500	--	289,193	--
2001	582,100	12.1%	322,386	11.5%

[2] Affordable rent and purchase prices are based on county median income.

Table 2-26
Median Home Sales Price – Unincorporated Areas and Orange County

Year	Unincorporated Areas		Orange County	
	Price ($)	% Change	Price ($)	% Change
2002	594,100	2.1%	375,777	16.6%
2003	659,100	10.9%	441,861	17.6%
2004	881,600	33.8%	563,303	27.5%
2005	946,000	7.3%	645,292	14.6%
2006	1,085,500	14.7%	689,422	6.8%
2007	1,012,800	-6.7%	681,015	-1.2%
2008	664,702	-34.4%	506,117	-25.7%
2009	620,673	-6.6%	415,000	-18.0%
2010	564,303	-9.1%	433,000	4.3%
2011	507,400	-10.0%	439,000	1.4%
2012	519,300	2.3%	422,000	-3.9%
2013	730,000	13.2%	535,000	21.9%
2014	795,000	8.9%	582,000	8.8%
2015	811,500	2.1%	609,000	4.6%
2016	839,750	3.5%	645,000	5.9%
2017	879,000	4.7%	685,000	6.2%
2018	924,000	5.1%	725,000	5.8%
2019	959,500	3.8%	740,000	2.1%
2020	1,000,750	4.3%	771,750	4.3%
2021	1,152,750	15.2%	889,000	15.2%
Year	**Unincorporated CDPs***		**Orange County**	
July 2022	1,407,500	22.1%	980,000	10.2%
July 2023	1,470,200	4.5%	1,055,000	7.6%

**Average median home sales prices of Unincorporated CDPs including: Coto de Caza, Ladera Ranch, North Tustin, and Rancho Mission Viejo only, not the entire Unincorporated area.*
Source: SCAG Local Profiles Dataset, 2021, Redfin

The table shows that the median price for resale homes in the Unincorporated areas in 2020 was $1,000,750 while the median price countywide was $771,750 and these numbers have only gone up in 2022 and 2023, with the median price in Unincorporated areas rising to $1,407,500 and $1,470,200 respectively and the median price countywide rose to $980,000 in 2022 and $1,055,000 in mid-2023. These trends are consistent with the rapid increase in home prices observed statewide beginning in 2020 which have only continued, with the median home price in Orange County consistently $150,000 to $200,000 higher than the median home price statewide from late 2018 through September 2023. Based on the estimated affordable purchase prices

shown in **Table 2-26** those units below the median sale price could be affordable to lower- or moderate-income households. These data illustrate the fact that public subsidies are generally required to reduce sales prices to a level that is affordable to very low-income buyers. Absent public subsidies or other programs to reduce the sales price of homes, the average sales price throughout Orange County exceeds what is generally affordable to extremely low-, very low-, and low-income households. To assist low-income home buyers, get into their first home, the County's Mortgage Assistance Program provides silent (deferred payment) down payment loans. (See Section 5 Housing Action Plan.)

Based on a comparison of the affordable rent and purchase amounts for each income category in **Table 2-26** with the median price of homes and gross rent as shown in **Table 2-27,** since 2015, home prices throughout Orange County, including the Unincorporated areas, have increased at a faster rate than household income. The number of households that can comfortably afford the median priced home has declined since 2015, particularly when it comes to extremely low- and very low-income households. Programs to assist lower-income households (extremely low-, very low-, low-, moderate-income) first-time buyers could help narrow the affordability gap.

Rental Housing

According to the American Community Survey data for Orange County as a whole, monthly median gross rent in Orange County reached a countywide total of $1,854 and $2,261 in Unincorporated areas in 2019. As **Tables 2-27 and 2-28** show, the median gross rent has increased for all unit sizes, except 4-bedroom units in Unincorporated CDPs, between 2015 and 2019 for Orange County and Unincorporated CDPs. In Orange County as a whole, studio apartments experienced the most rent increase with an approximate 30 % increase since 2015, while 3-bedroom units in the Unincorporated CDPs experienced the greatest rent increase since 2015. In Orange County as a whole, units with at least 5 bedrooms had the lowest percent increase at 13.1 % and in the Unincorporated CDPs, 4-bedroom units saw a 7.1 % reduction in price. Overall, the median gross rent increased by 19.8 % between 2015 and 2019 in Orange County as a whole and increased to a greater degree, 25.3 %, in Unincorporated Orange County. Real estate professionals expect rents to continue rising in the near future as growing demand exceeds the pace of new apartment construction.

Table 2-27
Median Gross Rent by Bedrooms in Orange County (2015-2019)

Unit-Based Size	2015	2016	2017	2018	2019	% Change 2015-2019
Studio	$1,115	$1,164	$1,256	$1,358	$1,457	30.7%
1 Bedroom	$1,255	$1,307	$1,384	$1,479	$1,574	25.4%
2 Bedrooms	$1,572	$1,627	$1,711	$1,794	$1,869	18.9%
3 Bedrooms	$2,054	$2,130	$2,185	$2,277	$2,372	15.5%
4 Bedrooms	$2,391	$2,441	$2,535	$2,617	$2,741	14.6%
5 or More Bedrooms	$2,472	$2,639	$2,624	$2,655	$2,796	13.1%
Median Gross Rent	**$1,548**	**$1,608**	**$1,693**	**$1,777**	**$1,854**	**19.8%**

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

Table 2-28
Median Gross Rent by Bedrooms in Unincorporated CDPs (2015-2019)

Unit-Based Size	2015	2016	2017	2018	2019	% Change 2015-2019
Studio	$1,108	$1,074	$1,615	$1,288	$1,331	20.1%
1 Bedroom	$1,348	$1,632	$1,892	$1,773	$1,838	36.4%
2 Bedrooms	$1,787	$1,753	$1,745	$1,863	$2,311	29.3%
3 Bedrooms	$2,285	$2,600	$2,458	$2,471	$3,150	37.9%
4 Bedrooms	$2,983	$2,900	$3,080	$2,790	$2,771	-7.1%
5 or More Bedrooms	$2,571	$3,030	$3,061	$3,464	$3,342	30.0%
Median Gross Rent	**$1,805**	**$1,956**	**$2,037**	**$2,208**	**$2,261**	**25.3%**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

When market rents are compared to the amounts lower-income households can afford to pay (as shown in **Table 2-25**), it is clear that very low- and extremely low-income households have a difficult time finding housing without overpaying. The gap between market rent for an average apartment and affordable rent at the very low-income level is about $400 per month, while the gap at the extremely low-income level is $881 per month. However, at the low-income and moderate-income levels, households have a much better chance of finding affordable rentals. The affordable payment for a 4-person low-income household falls between $1,205 and $1,926. Since 2015, average rental costs have increased at a faster rate than household income. The number of households that can comfortably afford the median gross rent throughout the County has declined since 2015 as shown by the percent change median gross rent increase of 19.8% in Orange County as a whole and 25.3% in Unincorporated CDPs between 2015 and 2019 as

compared to the highest affordable rent based on income for a low-income household being $2,561. Programs to assist extremely low- and very low-income renters could help narrow the affordability gap. See Strategy 1f, previous Housing Action Plan. The County also administers many funding programs to assist with the affordability gap including:

- HOME Funds used for tenant-based rental assistance and/or property acquisition; Community Development Block Grants which provide homebuyer assistance.
- Mortgage Credit Certificate Program, which provides first-time homebuyers with a tax credit of up to 15% of the mortgage interest paid for the year based on a percentage of the interest paid on their mortgage.
- Down Payment Assistance Loans for first-time homebuyers, which may be used in conjunction with the Mortgage Credit Certificate Program.
- Section 8 Housing Choice Voucher Program, which provides monthly housing assistance payments to assist extremely low- and very low-income families, elderly, and disabled persons with their rent payments that typically represents the difference between 30% of the recipient's adjusted monthly income and the federally approved Fair Market Rents, locally established Payment Standards, or the owner's Gross Rent, whichever is less.
- Housing Opportunities for Persons with AIDS funds which can be used for either project-based or tenant-based rental assistance, or short-term rent, mortgage, and utility payments, and other items.
- CalHome funds which can be used to assist with down payments, mortgage financing, homebuyer counseling, and technical assistance.
- California Emergency Solutions and Housing funds which can be used to provide housing stabilization services, including rental assistance.
- Housing for a Healthy California funding which can be used to provide rental subsidies and rental assistance for existing and new supportive housing opportunities for those who are chronically homeless or homeless.
- Permanent Local Housing Allocation funds, which can be used to provide rental assistance to individuals who would otherwise be at risk of homelessness or to provide down payment assistance.
- Transitional Housing Program funding, which can be used to help young adults aged 18 to 25 years of age in securing and maintaining housing.
- Funding through the California Housing Finance Agency to provide below-market interest rate mortgages to first-time homebuyers through approved private lenders.

- Funding through the California Housing Finance Agency to finance the construction or substantial rehabilitation of projects containing 20 or more housing units, with 20% of the units set aside for low-income tenants at affordable rents for at least 15 years to however long the mortgage is outstanding on the building.
- The Orange County Mortgage Assistance Program provides silent (deferred payment) down payment assistance loans to assist low-income first-time homebuyers whose annual income is 80% or less of the Area Median Income for eligible families in the Unincorporated areas and in participating cities.

Through these funding programs, and other programs which are specifically aimed at increasing the supply of affordable housing (both rental and for sale), the County aims to narrow the affordability gap for both residents in the Unincorporated areas and in surrounding incorporated cities.

Housing Needs

The following analysis of current housing conditions in Unincorporated Orange County presents housing needs and concerns relative to various segments of the population. This analysis relies in part on the County's Consolidated Plan (for Fiscal Years 2020-2024, adopted by the Board of Supervisors on June 23, 2020), which addresses the needs of the lower-income segment of the community and strategies to address those needs.

Several factors will influence the need for new housing in Orange County in coming years. The three major needs categories considered in this element include:

- Existing housing needs resulting from the overcrowding, overpayment, or substandard housing conditions.
- Housing needs of "special needs groups" such as the elderly, large families, people experiencing homelessness, and disabled.
- Housing needs resulting from population growth.

Demographic and market conditions analysis indicates that the number of households at the extreme ends of the income spectrum will continue to grow ("polarization of income" phenomenon), while the traditional middle income segments' participation in the housing market will decline both in size and activity.

In terms of specific housing needs, home ownership and first-time homebuyer programs are important for moderate- to above-moderate-income population in achieving home ownership. Lower-income groups will need the most assistance in meeting the increasingly higher cost burdens associated with owning a home, but for the most part these groups will be unable to

purchase homes in the County. The needs of lower-income groups, therefore, are usually met by the rental market.

In sum, since Orange County has a large population of affluent homeowners, greater attention needs to be placed on the affordability gap in the resale of smaller and lower priced homes to lower-income and first-time homebuyers. Attention will need to be placed in creating more opportunities for larger families in the rental market as well.

Overcrowding and Overpayment

Overcrowding and overpayment are indicators of barriers to housing and may additionally indicate imbalances in the existing housing demand and available stock. Both may help identify existing housing conditions that need to be addressed as well as households with housing cost burdens or unmet housing needs.

Housing is generally the single greatest expense for California families, and for households that are strained by housing costs, they may compensate by occupying smaller or insufficiently sized dwellings. Where there is more than one person occupying a room (excluding bathrooms and kitchens), a unit is considered overcrowded and health and safety concerns increase, and stress on the condition of existing housing stock and infrastructure increases as well.

Overcrowding

Overcrowding is often closely related to household income and the cost of housing. The U.S. Census Bureau considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, with severe overcrowding when there are more than 1.5 occupants per room. **Table 2-29** summarizes recent Census estimates of overcrowding for the Unincorporated areas as compared to the entire county.

Table 2-29
Overcrowding in Orange County and Unincorporated Areas

	2009		2015		2019	
	Unincorporated Areas	Orange County	Unincorporated CDPs Only*	Orange County	Unincorporated Areas	Orange County
Owner-Occupied Households	32,473	598,752	29,699	582,151	32,263	595,272
1.0+/Room Owner	548 1.7%	18,515 3.1%	546 1.8%	16,678 2.9%	725 2.2%	15,700 2.6%
1.5+/Room Owner	157 0.5%	6,423 1.1%	265 0.9%	5,679 1.0%	207 0.6%	6,186 1.0%
Renter-Occupied Households	7,322	375,249	10,852	427,202	9,354	442,220
1.0+/Room Renter	422 5.8%	38,259 10.2%	943 8.7%	43,665 10.2%	948 10.1%	43,328 9.8%
1.5+/Room Renter	344 4.7%	24,594 6.6%	563 5.2%	25,572 6.0%	257 2.7%	26,468 6.0%

Source: American Community Survey, 5-Year Estimates, 2009, 2015, 2019 and SCAG Pre-Certified Local Housing Data, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.*

Overcrowding was much more prevalent among renters than for owner-occupied units in both the Unincorporated areas and Orange County as a whole. Between 2009 and 2019, between 2.7% and 5.2% of renter households within the Unincorporated areas experienced overcrowding, a lower rate than experienced elsewhere in Orange County (between 6 and 6.6%). However, owner-occupied households experienced between 0.5% and 0.9% overcrowding during the same period in the Unincorporated areas. This indicates a demand for more rental housing within the Unincorporated areas and within Orange County as a whole, while supply remains tight. Notably, however, the overcrowding within the Unincorporated areas is less severe than Orange County as a whole. Programs removing barriers to the construction of more rental housing, such as existing policies streamlining the permit process for accessory dwelling units or duplexes, may assist in increasing the supply of rental housing to address overcrowding. Additionally, rental assistance programs may be able to reduce the barriers to extremely low- and very low-income households renting a unit with sufficient rooms. Existing funding sources incentivize both new and existing landlords to sign new renters that benefit from housing assistance and provide further assistance to renters to help defer move-in costs.

Overpayment

According to State housing policy, overpaying occurs when housing costs exceed 30% of gross household income. **Table 2-30** displays recent estimates of households in Unincorporated CDPs that are overpaying for housing. According to SCAG, and as shown in **Table 2-31**, over 50% of all renter households in the Unincorporated areas were overpaying for housing. **Table 2-32**

displays mortgage-holding households (owners) in the Unincorporated areas overpaying for housing. Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For lower-income renters, severe cost burden can require families to double up resulting in overcrowding and related problems.

Table 2-30
Household Cost Burden – Unincorporated CDPs and Orange County

Income	Orange County		Unincorporated CDPs	
	Household Cost Burden		Household Cost Burden	
	>30%	>50%	>30%	>50%
Household Income less-than or = 30% MFI	135,715	114,560	1,960	1,685
Household Income >30% to less-than or = 50% MFI	101,280	48,175	1,590	1,125
Household Income >50% to less-than or = 80% MFI	97,005	22,425	2,350	1,030
Household Income >80% to less-than or = 100% MFI	33,515	4,100	1,160	210
Household Income >100% MFI	40,440	3,670	2,600	400
Total Households	407,955	192,930	9,660	4,454

Source: HUD CHAS, 2019
Note: MFI refers to the HUD Area Median Family 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. MFI 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.
Note: MFI in Orange County in 2019 was $97,900 as determined by HUD
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Table 2-31
Renter Overpayment by Income Category
Unincorporated Orange County

% of Income Paid for Housing	Renters	
	Households	%
All households	9,354	100.0%
Less than 10%	265	2.83%
10-14.9%	776	8.30%
15-19.9%	686	7.33%
20-24.9%	1,035	11.06%
25-29.9%	1,023	10.94%
30-34.9%	1,029	11.0%
35-35.9%	695	7.43%
40-49.9%	853	9.12%
50% or more	2,328	24.89%
Not computed	664	7.10%
Households overpaying	4,905	52.40%
Source: SCAG Pre-Certified Local Housing Data – August 2020		

Table 2-32
Homeowner Overpayment by Income –
Unincorporated Orange County

% of Income Paid for Housing	Number of Households by Annual Income				
	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 or more
Over 30%	499	635	714	1,834	5,485
20-29%	0	21	64	209	6,904
Under 20%	0	0	15	194	8,192
Source: SCAG Pre-Certified Local Housing Data – August 2020					

As the above tables demonstrate, 1,960 households in Unincorporated Orange County areas making less than 30% of the AMI are having to pay more than 30% of their income to household costs. According to SCAG Pre-Certified Local Housing Data, there are a total of 41,617 households in Unincorporated Orange County. Thus, 4.7% of all households in Unincorporated Orange County areas have to pay more than 30% of their income to household costs. This means that extremely and very low-income households are disproportionately impacted by overpayment in Unincorporated areas. In addition, 52.44% of renters in Unincorporated areas pay 30% or more of their income for rental costs. These numbers demonstrate that more than 50% of renters are overpaying, which again, disproportionately impacts lower-income households. According to

SCAG data, 9,167 households or 22% of mortgage holding (homeowner) households in Orange County pay more 30% or more of their income for housing costs. According to SCAG data, 5,485 homeowners, or 22% of all homeowners covered in **Table 2-32**, making $75,000 or more are still paying more than 30% of their income towards housing costs. Approximately 7% of all households in Unincorporated areas making less than $50,000 per year are paying over 30% of their incomes to housing costs.

According to the most recent *Orange County Analysis of Impediments To Fair Housing Choice, April 2020* (Orange County AI), "[t]here are 194,569 households in [all of] Orange County experiencing housing cost burden, with monthly housing costs exceeding 30 % of monthly income. 104,196 of these households are families. However, Orange County has only 429 Project-Based Section 8 units and 33 Other Multifamily units with more than one bedroom capable of housing these families. Housing Choice Vouchers are the most utilized form of publicly supported housing for families, with 2,286 multi-bedroom units accessed. Large family households are also disproportionately affected by housing problems as compared with non-family households. Some focus groups have communicated that regulations and cost issues can make Orange County too expensive for families. The high percentage of 0-1- bedroom units in publicly supported housing and the low percentage of households with children in publicly supported housing support this observation."

Based on the data, the households experiencing monthly housing costs exceeding 30% of monthly income in Unincorporated Orange County areas make up only 1% of the households in all of Orange County facing household cost burden. This is not a significant percentage demonstrating that the Unincorporated Orange County areas do not face significant cost burden challenges compared to other jurisdictions in the County.

Table 2-33
Publicly Supported Housing Units by Program Category, Orange County

Housing Units	Number	% of Households Experiencing Cost Burden
Total Households Experiencing Housing Cost Burden	194,569	-
Publicly Supported Housing Units		
- Public Housing	N/A	N/A
- Project-based Section 8	429	0.22%
- Other Multifamily	33	0.02%
- HCV Program	2,286	1.2%
- LITHC	2,110	1.1%

Source: HUD Inventory Management System (IMS)/PIH Information Center (PIC),

Table 2-34
Publicly Supported Housing Demographics, Orange County

	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Project-Based Section 8	164	40.80%	9	2.24%	88	21.89%	138	34.33%
Other Multifamily	22	95.65%	0	0.00%	1	4.35%	0	0.00%
HCV Program	808	35.96%	156	6.94%	412	18.34%	866	38.54%
LIHTC	1,352	25.12%	254	4.72%	1,621	30.11%	991	18.41%
Total Households	140,530	67.71%	2,907	1.40%	30,185	14.54%	29,767	14.34%
0-30% of AMI	14,094	61.62%	259	1.13%	4,388	19.18%	3,541	15.48%
0-50% of AMI	23,293	50.78%	503	1.10%	9,148	19.94%	6,728	14.67%
0-80% of AMI	43,952	56.98%	926	1.20%	14,322	18.57%	11,131	14.43%

Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

Tables 2-33 and **2-34,** above, show the total numbers and percentages of different kinds of affordable housing supported by funding that the County facilitates. The numbers vary between the two tables, because of the slightly different information they track, and because they were compiled by different sources in different years. However, taken together, they show that the largest percentage of publicly supported housing is supported by the Housing Choice Voucher (HCV) program, followed by the Low-Income Housing Tax Credit (LIHTC) program, with Section 8 project-based vouchers and other forms of multifamily public housing support falling significantly behind in terms of the total number of housing units each of those funding programs support. The data also indicates that the largest amount of support provided by public housing programs goes to White households, followed by Hispanic and Asian or Pacific Islander households.

As shown in **Table 2-34,** in Project-Based Section 8 developments, the majority racial/ethnic group in Orange County as a whole is either White or Asian/Pacific Islander. Housing Choice Voucher households are the most evenly distributed across racial/ethnic groups. According to the Orange County AI, Asian American or Pacific Islanders make up a majority of HCV units in Westminster, Fountain Valley, and Garden Grove, and a majority in Santa Ana. They also make up a plurality in Orange County, followed closely by White residents.

County Programs to Encourage Development of Affordable Housing

Several County programs encourage and assist in the development of affordable housing and relieve overpayment. Those programs are described in brief below and are incorporated into the Housing Action Plan in Section 5.

Housing Opportunities Overlay Zone (see Program 1):

The goal of the Housing Opportunities Overlay Zone is to facilitate the development of affordable housing units on underutilized non-residentially zoned land in the Unincorporated areas by allowing for residential uses on commercial and industrial zoned sites. The Board of Supervisors adopted the Housing Opportunities Overlay Zone regulations on January 10, 2006. To provide guidelines for the development of Housing Opportunity sites, the Planning Commission approved the Housing Opportunities Manual on June 21, 2006.

The Housing Opportunities Overlay Zone allows affordable housing development by-right (i.e., without a Use Permit) in the following commercial and industrial districts:

- C1 – Local Business.
- C2 – General Business
- CC – Community Commercial[3]
- CH – Commercial Highway[4]
- CN – Commercial Neighborhood.
- M1 – Light Industrial
- MX – Mixed-Use

The Housing Opportunities Overlay Zone's affordability requirements include the following criteria:

- Rental projects.
- 100% of the units must be affordable to low- and very low-income households (70% low-income and 30% very low-income) for at least 55 years.
- For sites located within a commercial or industrial zoning district, the site development standards for the R3 "Apartment" District shall apply except that the base density shall be 70 dwelling units per acre (net development area) and maximum building height shall be sixty-five (65) feet.

If necessary to make the project economically feasible, the County offers the following incentives:

- Density bonus.

[3] On June 25, 2024, the Board of Supervisors approved a zone change that rezoned the Commercial and Residential Professional Zoning Districts to the Mixed-Use Zoning District. While only a few C1 and C2 zoned parcels remain, all other Commercial (CC and CH) and Residential Professional Zone Districts have been rezoned to the Mixed-Use Zoning District.

[4] Ibid.

- Setback reduction.
- Increased maximum lot coverage.
- Increased building height.

Although not considered an incentive, the County also offers alternative (reduced) parking requirements for residential development within the Housing Opportunities Overlay Zone.

On December 9, 2008, the Board of Supervisors adopted a Zoning Code amendment extending the Housing Opportunities Overlay Zone regulations to multifamily districts:

- R2 – Multifamily Dwelling.
- R3 – Apartment.
- R4 – Suburban Multifamily
- RP – Residential Professional[5]

On July 28, 2020, the Board of Supervisors adopted a Zoning Code amendment to increase the base density from 25 to 43.5 dwelling units per acre (du/ac).

On September 27, 2022, the Board of Supervisors, in compliance with State law requiring that any necessary rezoning to accommodate RHNA be completed by October 15, 2022, adopted a Zoning Code amendment to increase the base density in the Housing Opportunities Overlay Zone from 43.5 to 70 du/ac, excluding any applicable density bonus units. On June 25, 2024, the Board of Supervisors adopted a Zone Change to include a Mixed-Use District to be included in the Housing Opportunities Overlay.

Since the adoption of the Housing Opportunities Overlay Zone, eight projects (within the Housing Opportunities Overlay Zone) with a total of 306 affordable units have been approved, which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families (see Table A-3). The average density of these projects has been over 37.68 units per acre as compared to the initial base density of 25 units per acre. Appendix B contains a detailed discussion of the additional development capacity of parcels in the Housing Opportunities Overlay Zone.

Density Bonus (see Program 5):

Beyond local requirements, California law allows for a 35% increase in the density of a residential development when a housing developer agrees to construct any of the following: a minimum of 20% of the total units of a housing development for lower-income households or 10% of the total units for very low-income households. A senior housing development is also

[5] Ibid.

eligible for a 20% density bonus if it includes at least 35 dwelling units, and the applicant seeks a density bonus.

The County must also provide at least one of the following:

- A reduction in site development standards or a modification of zoning code requirements or architectural design requirements that exceed the minimum building standards approved by the California Building Standards Commission.
- Approval of mixed-use zoning in conjunction with the housing project if commercial, office, industrial, or other land uses will reduce the cost of the housing development and if the commercial, office, industrial, or other land uses are compatible with the housing project.
- Other regulatory incentives or concessions proposed by the developer or the city, county, or city and county that result in identifiable cost reductions.

Table 2-35, below, shows a summary of the affordable projects that have been developed within Orange County between 2006 and 2022 at various densities ranging from 12 to 63.4 dwelling units per acre. A significant portion of these projects have been successfully developed at densities of 20 to 25 units per acre, which demonstrates that the existing allowable densities are not an issue and that affordable developments may also benefit from density bonuses as a means of providing additional affordable units.

Funding Resources to Encourage Development of Affordable Housing (see Program 11):

The County has a variety of funding resources available to address affordable housing and overpayment. Each funding resource is described in detail in the Housing Action Plan, but the potential programs are listed here as relevant to overpayment and affordability: HOME Funds, Community Development Block Grant Program, Section 108 Program, Mortgage Credit Certificate Program, Section 8 Housing Assistance Program, Affordable Housing and Sustainable Communities Program, CALHOME, Golden State Acquisition Fund, Local Housing Trust Fund, Multifamily Housing Program, National Housing Trust Fund, Permanent Local Housing Allocation, Predevelopment Loan Program, Supportive Housing Multifamily Housing Program, California Housing Finance Agency, Low-Income Housing Tax Credit, Orange County Housing Trust, Orange County Housing Finance Trust, and the County's Mortgage Assistance Program. **Table 2-35**, below, is a list of the affordable projects that have received funding from the County and been developed within Orange County between 2006 and 2022.

Table 2-35
Affordable Projects That Received Funding from County of Orange
Built or Acquired 2006 – 2022

Project/ Location	Year Built or Acquired	Total Units	General Plan	Zoning	Allowable Density (du/ac)	Project Density (du/ac)	Affordability/ Assistance Level	Funding
Laguna Canyon/Irvine	2006	120	Unknown	Med. Density Residential	Unknown	20.98	30 and 50%	2002 NOFA
Ability First Apartments/ Irvine	2008	24	Med. Density Residential	Med. Density Residential	Unknown	12	30% AMI	2001 NOFA
Dorado Senior Apartments/ Buena Park	2007	150	Unknown	Commercial	Unknown	62	30,50 and 60% AMI	2006 NOFA
Stratford Place and Windsor Court	2005	86	Unknown	Unknown	Unknown	28.01	30,50 and 60% AMI	ATT 5.21.02 RFP
Northwood Apartments/ Irvine	2006	96	Medium High Density Residential	Medium-High Density Residential	Unknown	20.96	30 & 50% AMI	2002-B NOFA
Montecito Vista Apartments/ Irvine	2006	162	Unknown	Research and Industrial	Unknown	22.98	30,50 and 60% AMI	2005 NOFA
Cornerstone Apartment Homes/ Anaheim	2007	49	Suburban Residential	CN – Commercial Neighborhood and Housing Opportunities Overlay Zone	25	33.8	30,50 and 60% AMI	2005 NOFA
Granite Court	2008	71	Unknown	Unknown	Unknown	Unknown	30,50 and 60% AMI	2004 NOFA & Apartment Development Revenue Bonds, Issue A of 2007
Woodbury NE Apartments	2008	150	Unknown	Unknown	Unknown	Unknown	30,40 and 50% AMI	2005 NOFA
Birch Hills Apartment Homes	2012	114	Unknown	Unknown	Unknown	Unknown	30, 45 and 50% AMI	2010 NOFA
Buena Vista Apartments	2011	17	Suburban Residential	C2 General Business District	25	33.8	30, 40 and 60% AMI	2010 NOFA
Stonegate I Apartments	2009	38	Suburban Residential	C1 Local Business District	25	33.8	30, 40, 50 and 60% AMI	2008-B NOFA
Stonegate II Apartments	2009	26	Suburban Residential	C1 Local Business District	25	33.8	30, 40, 50 and 60% AMI	2008-B NOFA
San Clemente Senior Apartments	2012	76	Unknown	Unknown	Unknown	Unknown	30 & 50% AMI	2010 NOFA
Doria Apartment Homes Phase I	2011	60	Unknown	Unknown	Unknown	Unknown	30, 45 and 60% AMI	2008-B NOFA
Avenida Villas	2011	29	Suburban Residential	R3 Apartment District	43	35.4	30% AMI	2010 NOFA
Diamond Aisle Apartments	2009	25	Unknown	Unknown	Unknown	Unknown	30% AMI	2006 NOFA
Bonterra Apartment Homes	2010	94	Suburban Residential	Planned Community	Unknown	21	30, 35, 50 and 60% AMI	2005 NOFA
Cerritos Family Apartments	2012	60	Suburban Residential	R2 Multifamily Dwelling District	43	30	50% and 80% AMI	2010 NOFA
Potter's Lane	2017	16	Community	C2 General Business	25	39	30% AMI	2014 NOFA
Heroes' Landing	2020	76	Commercial	Unknown	Unknown	Unknown	30% AMI	SNHP, 2014 NOFA
Casa Querencia	2021	57	Unknown	Unknown	Unknown	Unknown	30% and 60% AMI	SNHP, 2014 NOFA
Placentia Veterans Village	2020	50	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA
Salerno at Cypress Village	2020	80	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA
Buena Esparanza	2021	70	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA SNHP
Della Rosa	2020	50	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	2016 NOFA
Santa Ana Arts Collective	2020	58	Unknown	Unknown	Unknown	Unknown	30, 35, 40, and 60% AMI	SNHP, 2020 NOFA
Westminster Crossing	2021	65	Unknown	Unknown	Unknown	Unknown	20 and 70% AMI	SNHP, 2016 & 2020 NOFA

Table 2-35
Affordable Projects That Received Funding from County of Orange
Built or Acquired 2006 – 2022

Project/ Location	Year Built or Acquired	Total Units	General Plan	Zoning	Allowable Density (du/ac)	Project Density (du/ac)	Affordability/ Assistance Level	Funding
Altrudy Senior Apartments	2021	48	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
FX Residences	2022	17	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
Legacy Square	2023	93	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
Fountain Valley Housing	2022	50	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
Casa Paloma	2022	71	Unknown	General Business	25	95	30 and 50% AMI	2016 NOFA
The Groves	2022	75	Community Commercial	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
The Crossroads at Washington	2023	86	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
Villa St. Joseph	2023	50	Unknown	Unknown	Unknown	Unknown	20% AMI	NPLH & 2020 NOFA
Airport Inn	2021	58	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 & 2020 NOFA
Mountain View	2023	71	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
WISEPlace Supportive Housing	2024	52	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Cartwright Family Apartments	2023	60	Unknown	Unknown	Unknown	Unknown	30%-80% AMI	2020 NOFA
Lincoln Avenue Apartments	2023	55	Unknown	Unknown	Unknown	Unknown	30, 50, 60, and 70% AMI	SNHP
Santa Angelina Senior Community	2023	65	Unknown	Unknown	Unknown	Unknown	25 and 60% AMI	2020 NOFA
Orchard View Gardens	2023	66	Unknown	Unknown	Unknown	Unknown	30%-60% AMI	SNHP & 2020 NOFA
Center of Hope/The Salvation Army	2022	72	Unknown	Unknown	Unknown	Unknown	25 and 30% AMI	SNHP, NPLH & 2020 NOFA
Westview House	2023	85	Unknown	Unknown	Unknown	Unknown	30 and 60% AMI	SNHP, NPLH & 2020 NOFA
Huntington Beach Senior Housing	2023	43	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	SNHP, NPLH & 2020 NOFA
Paseo Adelanto	2023	50	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	2020 NOFA
Valencia Gardens Orange Corporate Yard	2023	62	Unknown	Unknown	Unknown	Unknown	30 and 60% AMI	2020 NOFA
The Meadows	2021	65	Unknown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	2020 NOFA
North Harbor Village	2022	91	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #1: Stanton Inn	2020	72	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #2: Tahiti Motel	2020	60	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #3: Riviera Motel	2020	21	Unknown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	2020 NOFA
Homekey Property #4: HB Oasis	2020	64	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #5: Motel 6	2020	88	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Miraflores	2022	86	Unknown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	MHSA from OCHFT

Source: OC Community Resources/Housing, June 16, 2023

Accessory Dwelling Units (ADUs)(see Program 7)

In response to state-mandated requirements and local needs, the County permits a property owner in any district, including planned community and specific plan areas, where a single-

family unit exists on a parcel zoned for such purposes, to apply to establish an accessory dwelling unit (ADU) along with junior accessory dwelling unit (if owner occupied) by-right.

The definition of ADUs and JADUs are provided below:

"Accessory dwelling unit" (ADU) is defined as a dwelling unit providing complete independent living facilities for one (1) or more persons that is located on a parcel with another primary, single-family dwelling as defined by Government Code Section 65852.2, as may be amended. It shall include permanent *provisions* for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling's location. An ADU may be within the same structure as the primary unit, in an attached structure, or in a separate structure on the same parcel. This use is distinguished from a duplex.

"Junior Accessory Dwelling Unit" (JADU) is defined as a unit that is no more than five hundred (500) square feet in size and contained entirely within an existing or proposed single-family dwelling unit, pursuant to California Government Code Section 65852.22, as may be amended. A JADU shall include an efficiency kitchen (sink, cooking appliances, food preparation counter, and storage cabinets) and may include separate, or may share sanitation facilities with the existing structure.

Accessory dwelling units are also permitted on existing multifamily residential projects. State regulations also changed to allow property owners to convert existing garages and structures into ADUs and the County allows this change. Each ADU is required to have a separate address.

Accessory dwelling units serve to augment resources for senior housing, or other low- and moderate-income segments of the population. The development standards are reasonable to ensure neighborhood compatibility, and with the proposed amendment, will not present an unreasonable constraint to development.

In July 2020, the County's Comprehensive Zoning Code was updated in accordance with the October 2019 passage of California Assembly Bill AB 68 (AB 68), Assembly Bill 881 (AB 881), Assembly Bill 587 (AB 587), Assembly Bill 671 (AB 671), and Senate Bill 13 (SB 13). The provisions encourage the development of ADUs by making the process less restrictive for homeowners.

As of November 27, 2023, the County of Orange has issued a total of 235 ADU permits (ADU and JADUs included) in Unincorporated areas since 2020. **Table 2-36** below includes a breakdown of permits issued by the County starting in 2020 to November 2023.

Table 2-36
Issued ADU/JADU Permits 2020-2023

Unincorporated Areas	Year			
	2020	2021	2022	2023
Anaheim	9	18	22	16
Coto de Caza	0	1	0	2
Garden Grove	2	0	0	1
Ladera Ranch	1	1	1	0
Midway City	15	8	6	14
North Tustin	7	3	7	6
Orange	4	4	4	8
Rossmoor	2	7	2	4
Santa Ana	9	16	18	15
Silverado	0	1	0	0
Trabuco Canyon	0	1	0	0
Year Total	49	60	60	66
Total All Years	235			

Source: OC Development Services, November 2023

State mandates, the Comprehensive Zoning Code update, pre-approved ADUs plans, and permitting demonstrate an upward trend for ADU development within the County. The continued development of ADUs and JADUs offers another opportunity to address the need for additional very low-, low-, and moderate-income rental housing. This coincides with statewide trends showing an increase in the issuance of ADU or JADU permits since ADUs were first authorized for ministerial approval by state legislation in 2016.

Other Housing Choices:

Mobile Homes/Manufactured Housing

There is often an economy of scale in manufacturing homes in a plant rather than on site, thereby reducing cost. State law precludes local governments from prohibiting the installation of mobile or manufactured homes on permanent foundations on single-family lots. It also declares a mobile home park to be a permitted land use on any land planned and zoned for residential use and prohibits requiring the average density in a new mobile home park to be less than permitted by the Zoning Code.

In accordance with zoning regulations, the County has determined that like single-family homes, mobile homes and manufactured housing are principally permitted in all residential zones. The number of mobile home or manufactured dwelling units permitted, as well as minimum setback

requirements, are the same as the maximum number of dwelling units and setback requirements permitted by the applicable district regulations. Off-street parking is consistent with the regulations found above, except as follows: Two (2) parking spaces for each mobile home dwelling unit; and one (1) parking space for each four (4) mobile home units to allow for additional guest parking.

Also, there are additional screening and landscaping requirements, and supplemental design criteria for mobile or manufactured home developments. The approving authority may grant exceptions if special circumstances are warranted, or if the requirements become excessive when applied to a specific development.

Boarding Houses

Boarding Houses are allowed by-right (6 or fewer residents) in multifamily residential districts or subject to a Use Permit (more than 6 residents) in the R-3 (apartment) district.

Single Room Occupancy (SRO)

In addition, the County Zoning Code permits the construction of Single Room Occupancy (SRO) facilities in any district where hotels are permitted, subject to approval of a Use Permit. These regulations facilitate the development or conversion of facilities to serve those in need of emergency shelter by expanding the geographic area where suitable facilities may be built and requiring only those conditions that are reasonably necessary to foster sound planning and neighborhood compatibility. The conditions and development standards that are applied to these facilities are no stricter than those for conventional hotel or motel developments.

One SRO-type facility has been built in the Unincorporated areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Future Growth Needs

Overview of the Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is a key tool for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for each planning period. The current planning period is from 2021 to 2029. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

Table 2-37 provides population projections through 2040 for Unincorporated Orange County, as calculated by the Southern California Association of Governments 2016-2040 Regional Growth Forecast. Despite the population of Unincorporated Orange County shrinking by nearly one-quarter, the population of the Unincorporated areas is forecasted to grow by 49.2 %. In comparison, the population of Orange County as a whole is forecasted to grow by only 12.7 %. Population growth is one factor that informs the need for housing in the Unincorporated areas.

Table 2-37
Population Growth Forecast (2012-2040)

Jurisdiction	2012	2020	2035	2040	% Change 2012-2040	Average Annual Growth Rate
Unincorporated Areas	121,160	128,421 +6%	177,900 +38.5%	180,100 +1.2%	48.6%	1.7%
County Total	3,010,232	3,180,491 +5.6%	3,499,000 +10%	3,535,000 +1%	17.4%	0.6%

Source: SCAG 2016-2040 RTP/SCS Final Regional Growth Forecast by Jurisdiction Report

The current RHNA Allocation Plan was adopted by the Southern California Association of Governments (SCAG) in March 2021. The future need for housing is determined primarily by the forecasted growth in households in a community. Each new household, created by a child moving out of a parent's home, by a family moving to a community for employment, and so forth, creates the need for a housing unit. The housing need for new households is then adjusted to maintain a desirable level of vacancy to promote housing choice and mobility.

SCAG must take into consideration the following factors:

- 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.
- Geological and topographical constraints.

An adjustment is also made to account for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors – household growth, vacancy need, and replacement need – determines the construction need for a community. Total housing need is then distributed among four income categories on the basis of the County's

income distribution, with adjustments to avoid an over-concentration of lower-income households in any community.

2021-2029 Growth Needs

The total housing growth need for Unincorporated Orange County during the 2021-2029 planning period is 10,406 units. This total is distributed by income category as shown in **Table 2-38.** Of the 3,139 extremely low- and very low-income unit growth need, half (1,570 units) are estimated to be needed for extremely low-income households during the planning period, as provided by state law.

Table 2-38
Regional Housing Growth Needs – Unincorporated Orange County

Extremely Low	Very Low	Low	Moderate	Above Mod	Total
1,570 units	1,569 units	1,866 units	2,040 units	3,361 units	10,406 units
15.1%	15.1%	17.9%	19.6%	32.3%	100%
Source: SCAG 2021					

A discussion of the County's capacity to accommodate this growth need is provided in **Appendix B, Land Inventory**.

Special Housing Needs

State Housing Law requires that the special needs of certain disadvantaged groups be addressed. These households typically experience difficulty in securing decent, affordable housing, and are not well guarded under market conditions. Many of these groups also fall under the category of extremely low-income households. The needs of the elderly, handicapped, large families, female heads of household, people experiencing homelessness, and farm workers are addressed below:

Extremely Low-Income Households

The HUD Comprehensive Housing Affordability Strategy (CHAS) provides data only on a countywide basis and does not disaggregate it to the jurisdictional level, but data was available for the Unincorporated CDPs (this does not represent all of the Unincorporated areas). **Tables 2-39 and 2-40** below include data characterizing affordability and cost burden and housing problems aside from cost burden for all income groups within Orange County.

Of the extremely low-income households living in Orange County, 122,605 have at least one of the four housing problems (80.4%). The housing problems identified by CHAS include the following:

- Units with physical defects (lacking a complete kitchen or plumbing facilities).
- Overcrowded conditions (housing units with more than one person per bedroom).

- Housing cost burdens exceeding 30% of gross income (including utilities).

Severe housing problems include units with physical defects and overcrowded conditions, as well as more than 1.5 person per bedroom and a cost burden greater than 50%.

Table 2-39
Housing Problems for all Households by Tenure – Unincorporated CDPs

Income by Housing Problem	Household Has at Least 1 of 4 Housing Problems	Household Has None of the 4 Housing Problems or Cost Burden Not Available
Owners		
Less-than or = 30%	850	530
>30% to less-than or = 50% MFI	890	500
>50% to less-than or = 80% MFI	1,625	905
>80% to less-than or = 100% MFI	1,020	715
>100% MFI	2,585	14,200
Total	**6,960**	**16,855**
Renters		
Less-than or = 30%	1,375	415
>30% to less-than or = 50% MFI	755	20
>50% to less-than or = 80% MFI	835	360
>80% to less-than or = 100% MFI	290	324
>100% MFI	185	1,570
Total	**3,430**	**2,695**

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Table 2-40
Housing Problems for all Households by Tenure – Orange County

Income by Housing Problem	Household Has at Least 1 of 4 Housing Problems	Household Has None of the 4 Housing Problems or Cost Burden Not Available
Owners		
Less-than or = 30%	43,745	16,500
>30% to less-than or = 50% MFI	35,095	24,770
>50% to less-than or = 80% MFI	50,045	48,165
>80% to less-than or = 100% MFI	25,385	40,345
>100% MFI	41,810	269,410
Total	**196,080**	**399,190**
Renters		
Less-than or = 30%	95,460	18,910
>30% to less-than or = 50% MFI	74,070	6,800
>50% to less-than or = 80% MFI	64,900	32,070
>80% to less-than or = 100% MFI	16,745	28,610
>100% MFI	12,280	92,375
Total	**263,450**	**178,770**

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

Tables 2-39 and **2-40** demonstrate that 12% of homeowners in the Unincorporated CDPs and 22% in Orange County as a whole earning less than 30% of MFI have at least one housing problem. For renters, the issues are more severe, with 40% of renters in Unincorporated CDPs and 36% in Orange County as a whole earning less than 30% MFI having at least one housing problem. Based on this data, renters could use housing assistance in the Unincorporated CDPs.

Projected Needs

To calculate projected housing need, the County assumes 50% of its very low-income regional housing need is extremely low-income households.

Table 2- 41
Progress Towards Meeting New Housing Need
Unincorporated Orange County 2021-2029

	Extremely Low Income	Very Low	Low*	Moderate*	Above Moderate	Total
Total RHNA 2021-2029	1,570	1,569	1,866	2,040	3,361	10,406
Total Completed Units 10/16/2021 - 12/31/2022	-	21	48	0	325	394
Remaining Units Needed 2021-2029	1,570	1,548	1,818	2,040	3,036	10,012

Source: SCAG RHNA and the County of Orange/OC Development Services, 2023

Available resources to address extremely, very low, and low-income household include, The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs. See Sections 4 and 5 for further details on these programs. The Housing Action Plan addresses the needs of extremely low-income households. However, it must be recognized that the development of new housing for the lowest income groups typically requires large public subsidies, and the level of need is greater than can be met due to funding limitations, especially during these times of declining public revenues.

Elderly Persons

The large demographic group known as "Baby Boomers" born between 1946 and 1964 have played a dominant role in society throughout their lives. The oldest of the Boomers turned 75 in 2021 and the youngest of this group will turn 60 in 2024. The growing wave of elderly retirees will have a huge impact on government, health care and the housing market.

The special housing needs of seniors are an important concern in Orange County. This is especially so since many retired persons are likely to be on fixed, low incomes and at greater risk of housing overpayment. In addition, the elderly have special needs related to housing construction and location. Seniors often require ramps, handrails, lower cupboards, and counters to allow greater access and mobility. In terms of location, because of limited mobility the elderly also typically need access to public facilities (e.g., medical and shopping) and public transit facilities.

Senior citizens also may need special security devices for their homes to allow greater self-protection. In many instances, the elderly prefer to stay in their own dwellings rather than relocate to a retirement community and may require assistance with home repairs and manual

house/yard work. In general, every effort should be made to maintain the dignity, self-respect, and quality of life of senior residents in the County.

Finding reliable transportation to medical appointments, senior centers, meal sites, and shopping remains a serious problem for seniors. Many seniors lack private transportation due to physical or financial limitations.

According to recent American Community Survey estimates, there were 27.4% of owner households and 16.3% of renter households in Unincorporated Orange County where the householder was 65 or older (**Table 2-42**). Many elderly persons are dependent on fixed incomes and/or have a disability. Elderly homeowners may be physically unable to maintain their homes or cope with living alone. The housing needs of this group can be addressed through smaller units, accessory dwelling units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs (see also Section 3 – Constraints for more information on how the County's land use regulations help to facilitate these types of housing options for seniors).

Table 2-42
Elderly Households by Tenure (Owner vs. Renter) - Unincorporated Orange County

	Owners		Renters	
Householder Age	**Households**	**%**	**Households**	**%**
Under 65 years	23,431	72.6%	7,825	83.7%
65 to 74 years	5,332	16.5%	839	9.0%
75 to 84 years	2,372	7.4%	498	5.3%
85 and over	1128	3.5%	192	2.1%
Total 65+ Households	**8,832**	**27.4%**	**1,529**	**16.3%**
Total Unincorporated households	32,263	100.0%	9,354	100.0%

Source: SCAG Local Housing Data Pre-Certified Local Housing Data 2020

Housing for the Elderly

Senior housing projects are a permitted use by right within any residential zoning district. The Zoning Code also provides a density bonus for the construction of senior housing projects. The Zoning Ordinance is not considered to be a constraint to the development of senior housing because the regulations are the same as for other residential uses in the same districts.

Large Families

Household size is an indicator of the need for large units. Large households are defined as those with five or more members. Among both owners and renters, just under half of all Unincorporated area households have only one or two members. About 16% of renter households and about 15% of owner households had five or more members (**Table 2-43**). This

data, together with overcrowding statistics, indicates that although a large proportion of households are small, there is a significant need for large rental units with four or more bedrooms.

Table 2-43
Household Size by Tenure (Owner vs. Renter)
Unincorporated Orange County

	Owners		Renters	
Household Size	Households	%	Households	%
1 person	3,878	12.0%	1,708	18.3%
2 persons	11,293	35.0%	2,457	26.3%
3 persons	5,734	17.8%	2,055	22%
4 persons	6,716	20.8%	1,656	17.7%
5 persons	2,985	9.3%	918	9.8%
6 persons	1,018	3.2%	355	3.8%
7+ persons	639	2%	205	2.2%
Total households	32,263	100%	9,354	100%

Source: American Community Survey, 2014-2018, 5-Year Estimates

Single-Parent Households

Single parent households face different challenges due to the greater need for daycare services, health care services, and other services. An issue observed for female-headed households with no spouse present is a lower average income due to income inequalities present in workplaces.

As seen in **Table 2-44** below, for Orange County as a whole, single parents represent 16.8% of family households (owners and renters), according to 2019 ACS 5-Year Estimates. There are 119,719 single-mother households and 55,032 single-father households in Orange County (11.5% and 5.3%, respectively). In the Unincorporated CDPs, single parents represent 12.7% of family householders. There are 2,824 single-mother households and 966 single-father households (9.4% and 3.2%, respectively).

Female-Headed Households

The U.S. Census Bureau estimates that about 9% of owner households and 15% of renter households in Orange County as a whole, and approximately 7% of owner households and 18% of renter households in the Unincorporated CDPs were headed by a female (**Table 2-44**). In both Orange County as a whole and in the Unincorporated CDPs, female headed households are more common than male-headed households for both homeowners and renters. This data suggests that while female-households occur at a lower rate than married couple family households and non-family households, female-headed households occur at a higher rate than male-headed households, and that within the Unincorporated CDPs specifically, female-headed households

represent a higher proportion of renters than in Orange County as a whole, indicating that some of the rental demand within the Unincorporated areas is driven by female-headed households.

Table 2-44
Household Type by Tenure (Owner vs. Renter) Unincorporated CDPs and Orange County

Family Household Type	Unincorporated CDPs				Orange County			
	Owners		Renters		Owners		Renters	
	Households	%	Households	%	Households	%	Households	%
Married couple family	18,217	76.49%	2,962	48.38%	385,611	64.8%	183,649	41.5
Male householder, no spouse present, family	588	2.47%	378	6.17%	23,491	3.9%	31,541	7.1%
Female householder, no spouse present, family	1,698	7.13%	1,126	18.39%	51,654	8.7%	68,065	15.4%
Non-family households	3,313	13.91%	1,656	27.05%	134,516	22.6%	158,965	35.9%
Total households	23,816	100.00%	6,122	100.00%	595,272	100%	442,220	100%

Source: American Community Survey 5-Year Estimates, 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Students

The need for student housing is another significant factor affecting housing demand. Student housing often only produces a temporary housing need based on the duration of the educational institution enrolled in. The impact on housing demand is often increased in areas surrounding universities and colleges. According to 2019 American Community Survey 5-Year Estimates, there are approximately 231,636 students in Orange County enrolled in undergraduate programs and 48,691 enrolled in graduate or professional programs. Together, this makes up just under 33% of the population over 3 years of age enrolled in school. There are no local universities within Unincorporated Orange County; however, some of the units in the Unincorporated County may be utilized as student housing for local universities within neighboring jurisdictions. Students may seek shared housing situations to decrease expenses and can be assisted through roommate referral services offered on and off campus. College graduates provide a specialized pool of skilled labor that is vital to the economy; however, a lack of affordable housing may lead to their departure post-graduation.

Persons with Disabilities

Access and affordability are the two major housing needs of disabled persons. Physically disabled persons often require specially designed dwellings to permit access within the unit, as well as to and from a site. *California Administrative Code* Title 24 sets forth access and adaptability requirements for the physically handicapped (disabled). These regulations apply to all buildings such as motels, employee housing, factory-built housing, and privately funded, newly constructed apartment houses containing five or more dwelling units. The regulations also require that rampways, larger door widths, restroom modifications, etc. be designed to enable

free access by the handicapped. Such standards, however, are not mandatory for new single-family residential construction.

Table 2-45
Persons with Disabilities by Age and Type
Orange County

Disability by Age	Persons	%
Age 5 to 17 – total persons	703,641	
Hearing difficulty	3,884	0.6%
Vision difficulty	3,363	0.5%
Cognitive difficulty	14,903	2.9%
Ambulatory difficulty	2,811	0.5%
Self-care difficulty	5,770	1.1%
Age 18 to 64 – total persons	1,998,667	
Hearing difficulty	22,495	1.1%
Vision difficulty	20,555	1.0%
Cognitive difficulty	48,383	2.4%
Ambulatory difficulty	46,589	2.3%
Self-care difficulty	20,493	1.0%
Independent living difficulty	41,021	2.1%
Age 65 and over – total persons	448,781	
Hearing difficulty	53,881	12.0%
Vision difficulty	22,610	5.0%
Cognitive difficulty	37,661	8.4%
Ambulatory difficulty	83,960	18.7%
Self-care difficulty	38,172	8.5%
Independent living difficulty	64,465	14.4%

Source: American Community Survey 5-Year Estimates 2019

Table 2-46
Persons with Disabilities by Age and Type
Unincorporated CDPs

Disability by Age	Persons with a Disability	%
Age 5-17 – Total Persons	**20,123**	
Hearing difficulty	113	0.56%
Vision difficulty	54	0.27%
Cognitive difficulty	649	3.23%
Ambulatory difficulty	41	0.20%
Self-care difficulty	101	0.50%
Age 18 to 64 – Total Persons	**53,448**	
Hearing difficulty	656	1.23%
Vision difficulty	642	1.20%
Cognitive difficulty	1,171	2.19%
Ambulatory difficulty	1,242	2.32%
Self-care difficulty	427	0.80%
Independent living difficulty	944	1.77%
Age 65 and over – Total Persons	**13,228**	
Hearing difficulty	1,439	10.88%
Vision difficulty	632	4.78%
Cognitive difficulty	1,042	7.88%
Ambulatory difficulty	1,942	14.68%
Self-care difficulty	819	6.19%
Independent living difficulty	1,869	14.13%

Source: American Community Survey 5-Year Estimates 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Disabled persons have special needs regarding location. There is typically a desire to be located near public facilities, and near public transportation facilities that provide service to those who rely on them.

Table 2-45 shows disability data for all of Orange County and **Table 2-46** shows disability data for Unincorporated CDPs. The data shows that in the under 65 age groups disabilities are relatively rare – typically approximately 2% or less of the population for all of Orange County and are similar in Unincorporated CDPs, with the exception of cognitive difficulties for the age group 5-17 in Unincorporated CDPs. However, among seniors the incidence of disabilities increases significantly. Nearly 18.7% of persons in this age group reported an ambulatory difficulty in all of Orange County and nearly 15%, in Unincorporated areas while more than 14%

had an independent living difficulty in all of Orange County and in Unincorporated CDPs. Members of this age group are frequently on fixed incomes or rely on public assistance.

Developmentally Disabled

As defined by federal law, "developmental disability" means a severe, chronic disability of 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.
- 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.

The U.S. Census Bureau does not record developmental disabilities. According to the U.S. Administration on Intellectual Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as having a developmental-disability is 1.5 percent. Many persons with intellectual and development disabilities can live and work independently within a conventional housing environment. Individuals with more severe disabilities 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 intellectual and developmental disabilities exist before adulthood, the first issue in supportive housing for the individuals with intellectual and developmental disabilities is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The State of California Department of Developmental Services (DDS) provided 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, for fiscal year 2017 to 2018. The Regional Center of Orange County (RCOC) is one of 21 regional centers in the State of California that serves as a point of entry to services for people with developmental disabilities. The RCOC is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families. The goal of the RCOC is to help

Orange County residents with developmental disabilities and their families obtain local services and support to help them live safely and with dignity in the community.

Any resident of Orange County who has a developmental disability that originated before 18 years of age is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans (IPP) and may include: adult day programs; advocacy; assessment/consultation; behavior management programs; diagnosis and evaluation; independent living services; infant development programs; information and referrals; mobility training; prenatal diagnosis; residential care; respite care; physical and occupational therapy; transportation; consumer, family vendor training; and vocational training. The RCOC also coordinates the State-mandated Early Start program, which provides services for children under age three who have or are at substantial risk of having a developmental disability. According to the RCOC Facts and Statistics data, the RCOC currently serves over 22,000 individuals in Orange County with developmental disabilities and their families.

Based in Orange County, the Dayle McIntosh Center for the Disabled, also referred to as DMC, is a non-profit organization that provides services to people with disabilities and facilitates equal access and inclusion within the community. The mission of the DMC (http://www.daylemc.org) is to advance the empowerment, equality, integration, and full participation of people with disabilities in the community. The DMC is a non-residential program, but instead promotes the full integration of persons with disabilities into the community, regardless of the disability, and aims to meet the standards and indicators established for operation of independent living centers in the federal Rehabilitation Act of 1973, as amended. The DMC is a peer-based organization meaning that most of the staff is composed of individuals who have disabilities themselves and have met the challenge of becoming self-sufficient. Its staff and board are composed of over 50% of people with disabilities. Its two offices, located in Anaheim and Laguna Hills, serve over 500,000 people with disabilities in Orange County and surrounding areas. The County housing programs and regulations facilitate the provision of special needs housing such as emergency shelters and transitional housing, permanent supportive housing, assisted living and group homes to serve the needs of persons with developmental disabilities.

Homelessness

Throughout the country, homelessness is a serious problem. Factors contributing to homelessness include: the general shortage of housing affordable to extremely low- to moderate-income households; increases in the number of persons whose incomes fall below the poverty level; reductions in public subsidies and benefits; de-institutionalization of the mentally ill; criminal justice system reforms at the federal and state level; and most recently the impacts of the COVID-19 pandemic.

Profiles of the Homeless Population in Orange County

The Orange County Health Care Agency (HCA) serves as the administrative entity for the Orange County Continuum of Care. As such, HCA undertakes a bi-annual "Point-in-Time" (PIT) count of the unsheltered homeless population in Orange County and an annual count of the sheltered population as part of its application for homeless assistance grant funds to U.S. Department of Housing and Urban Development (HUD) and State of California grant funds. The most recent PIT survey for which results are available was conducted in January 2019[6]. That survey estimated that there were approximately 6,860 persons experiencing homelessness in Orange County at the time of the survey[7]. Of those, the survey estimated that 42% of persons experiencing homelessness were sheltered and 58% were unsheltered. The 2019 PIT survey results indicated an increase in the homeless population compared to the findings of the 2017 PIT Count. However, it is important to note that the 2019 PIT Count incorporated a change in methodology that allowed the unsheltered count to take place over two days to ensure the county was canvassed effectively and collected unique identifying data points to de-duplicate records. Additionally, the 2019 PIT Count incorporated the use of ESRI Survey123 mapping technology, a smartphone application that mapped the locations and city of origin where individuals experiencing homelessness were surveyed and which helped to facilitate survey data collection. The ESRI Survey123 application incorporated questions that collected demographic, subpopulation, and homelessness-related data as required by HUD.

By the very nature of homelessness, it is difficult to determine the location of homeless persons over an extended period of time. However, the incorporation of new technologies allowed for the 2019 PIT survey to enumerate persons experiencing unsheltered homelessness by jurisdiction, where traditionally this had only been captured for individual those in emergency shelters and transitional housing. The County released the results of the 2019 PIT Count broken down by household type, subpopulations, and jurisdictions. Using data from the 2019 PIT County, the County has estimated there were approximately 43 individuals experiencing homelessness in the Unincorporated areas, located in shelter programs and on the streets and in places not meant for human habitation. This represents less than one percent of the homeless population as counted during the 2019 PIT. Although this method probably understates the number of persons experiencing homelessness in the Unincorporated areas, since some service providers did not provide exact addresses to safeguard and protect the privacy of their clients, it is a methodology that has been used in previous County Housing Elements certified by HCD. This estimate of 53 persons is used for purposes of 2017 Senate Bill 2 (SB 2) analysis. Regardless of what methodology is used for estimating the location of the persons experiencing homelessness, this is a regional issue, and the County will continue to address it from a regional perspective.

[6] OC Health Care Agency received a waiver from HUD to forgo the 2021 unsheltered count due to the COVID-19 pandemic in an effort to safeguard the health of those most vulnerable and limit the spread of COVID-19 illness.
[7] 2019 Orange County Homeless Census & Survey, for OC Partnership by Focus Strategies

County Efforts to Address Homelessness

Senate Bill 2 (SB2) of 2007 requires that jurisdictions quantify the need for emergency shelter and determine whether existing facilities are adequate to serve the need of the homeless population. Under SB2, an emergency shelter is defined as "housing with minimal supportive services for persons experiencing homelessness that is limited to occupancy of six months or less by a person experiencing homelessness. On September 28, 2022, Governor Gavin Newsom approved California Assembly Bill 2339 (AB 2339), which amends the provisions of Government Code 65583 concerning emergency shelters. AB 2339 expanded the definition of emergency shelter to include "other interim interventions, including, but not limited to, a navigation center, bridge housing, and respite or recuperative care." The new requirements of AB 2339 apply to housing elements due to be revised pursuant to Section 65588 on or after January 1, 2021, thus, this Housing Element must comply with the new provisions. Under the revisions to Government Code section 65583(a)(4)(A), the County must identify "one or more zoning designations that allow residential uses, including mixed uses, where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit and that are suitable for residential uses." The County must identify zoning designations that have sufficient sites to meet the need for emergency shelter for the Unincorporated areas, which as identified above in the PIT survey, would need to accommodate 43 homeless persons.

Under Government Code Section 65583(a)(4)(F), as amended by AB 2339, "[a] local government can demonstrate, to the satisfaction of the department, the existence of one or more emergency shelters either within its jurisdiction or pursuant to a multijurisdictional agreement that can accommodate that jurisdiction's need and the needs of the other jurisdictions that are a part of the agreement for emergency shelter identified in paragraph (7) may comply with the zoning requirements of subparagraph (A) by identifying a zoning designation where new emergency shelters are allowed with a conditional use permit."

The County of Orange can accommodate the needs of homeless in the Unincorporated areas through the existence of the multijurisdictional shelters of Bridges at Kramer Place and the Yale Navigation Center. Moreover, the County's existing Zoning Code complies with the requirements of AB 2339, Government Code Section 65583(a)(4)(A), through compliance with subparagraph (a)(4)(F), by allowing emergency shelters and residential uses in industrial and commercial zones subject to a site development permit and objective site development standards. OCCO § 7-9-44, *et seq.*

The County's Zoning Code allows emergency shelters by-right in the Housing Opportunities Overlay Zone, made up of commercial and industrial zoning districts that allow residential uses. Transitional housing and permanent supportive housing are permitted as residential uses subject to the same standards as apply to other residential uses of the same type in the same zoning district in compliance with Government Code section 65583.

Since 1998, the County of Orange (County) has had a comprehensive, coordinated, and regional strategy to address homelessness. This strategy has included the Orange County Continuum of Care (CoC) that includes participation of all 34 cities in Orange County, County Departments, 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 other stakeholders to identify the gaps and unmet needs of the persons experiencing homelessness in Orange County.

In May 2016, the County established the Office of Care Coordination located in the County Executive Office. The Office of Care Coordination engages across Orange County, working with cities and community-based organizations to strengthen regional capacity and multi-city, multi-sector investments to prevent and address homelessness, coordinate public and private resources to meet the needs of the homeless population in Orange County and promote integration of services throughout the community that improve the countywide response to homelessness.

In October 2016, the Office of Care Coordination produced an Assessment of Homeless Services in Orange County. The assessment outlines eight key findings, 26 recommendations in five focused areas and next steps for Orange County to improve the existing homeless service system and promote successful outcomes for people experiencing homelessness. For the following two years, the Office of Care Coordination made significant progress in the implementation of the recommendations and started to focus on understanding the intersectionality between homelessness and the various components of the System of Care.

In April 2018, the Office of Care Coordination presented an update on the Assessment of Homeless Services in Orange County and Building the County's System of Care that is integrated and regional to meet the unique needs of the people experiencing homelessness in our community. The County's System of Care focused on expanding capacity and developing new services and programming that better met the needs of people at risk of homelessness and experiencing homelessness. This included the implementation of the Restaurant Meals program, the Whole Person Care pilot program to expand housing navigation, disability benefit assistance through SOAR, and much more.

Additionally, the Assessment of Homeless Services provided the framework and infrastructure that the County has continued to build upon to ensure that all components of the System of Care are available and well-coordinated. The five components of the System of Care are Behavioral Health, Healthcare, Community Corrections, Housing, and Benefits and Support Services, which involve several County Departments in the ongoing response to homelessness.

The Office of Care Coordination staffs and facilitates the Commission to End Homelessness established in 2018. The Commission works in collaboration with the County government, 34 city governments, business sector, philanthropic organizations, community organizations, faith-based organizations, health care, public safety, and other interested stakeholders to promote an effective response to homelessness within Orange County. The Director of Care Coordination

works with commission members to focus on regional policy and implementation strategies, affordable housing development, data and gaps analysis, best practice research, social policy, and systemic change.

In October 2022, the Commission to End Homelessness presented the Homeless Service System Pillars Report to the Board of Supervisors. The Homeless Service System Pillars Report resulted from an analysis of the Homeless Service System through a four-pillar framework: Prevention, Outreach and Supportive Services, Shelter, and Housing. The Homeless Service System Pillars Report yielded a definition, set of goals, best practices and guiding principles for each pillar and will help ensure that best practices, guiding principles and commitments are incorporated into both the Office of Care Coordination and County department's programming to align and establish consistent service delivery across the County.

The Office of Care Coordination also serves as the Collaborative Applicant and Administrative Entity of the Orange County CoC. The Orange County CoC has a 19-member Board that supports the local planning to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness. has a number of committees aimed at coordinating and collaborating on specific functions and programs associated with the Continuum of Care Program. The committees contribute to the ongoing planning, coordination, and collaboration of homeless services and programs to address the needs of individuals and families experiencing homelessness and preventing homelessness.

- The **Policies, Procedures and Standards Committee**[8] was created to continuously review and advise the CoC Board on items related to the governing and committee structures, operational guidelines, decision-making protocols, appointment processes and other matters related to policies, procedures and standards related to the conduct and operation of the Orange County CoC and the CoC Board. This includes designating and assigning tasks to workgroups and ad hoc groups to improve project performance, assessments, and policies.
- The **CES Steering Committee**[9] was created to continuously review and advise the CoC Board and Policies, Procedures and Standards (PPS) Committee on items related to the policies, procedures, and operation of the CES in Orange County. The CES Committee will support the CoC Board with policy development,

[8] Policies, Procedures and Standards Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Policies%20Procedures%20and%20Standards%20Charter.pdf
[9] Coordinated Entry System Steering Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Coordinated%20Entry%20System%20Steering%20Committee%20Charter.pdf

supporting strategic implementation of the CES and evaluating the efficiency and effectiveness of CES.

- The **Housing Opportunities Committee**[10] is to identify, coordinate and evaluate housing opportunities for people experiencing homelessness in the Orange County CoC. The Housing Opportunities Committee fulfills this goal by coordinating information and resources amongst regional housing providers, identifying gaps in affordable and permanent supportive housing, and supporting the creation of more housing opportunities in coordination with affordable housing developers, homeless service providers, cities, and Public Housing Authorities. The mission of the Housing Opportunities Committee is to provide more housing opportunities for people experiencing homelessness in Orange County.
- The **Orange County Service Provider Forum**[11] was created to convene the CoC General Membership semiannually, recruit additional members for the Orange County CoC and promote information and resource sharing for service providers and community partners working on the frontlines of the homeless response system.
- The **Transitional Aged Youth Collaborative Committee**[12] was created to coordinate services, enhance collaboration, and recommend best practices for TAY experiencing homelessness in Orange County. This includes recommending policies, procedures and sharing input on improving the quality and types of services provided to the Orange County CoC Board.
- The **Veterans Committee**[13] was created to ensuring that the CoC is actively working to prevent, reduce, and end homelessness for veterans, and measuring progress on these efforts. The Veterans Committee aligns with the intent of ensuring that the CoC is actively working to prevent, reduce, and end homelessness for veterans, and measuring progress on these efforts. The Veterans Committee will provide leadership on the issue of veteran homelessness and

[10] Housing Opportunities Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Housing%20Opportunities%20Charter.pdf
[11] Service Provider Forum Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Service%20Provider%20Forum%20Governance%20Charter.pdf
[12] Transitional Aged Youth Collaborative Committee - https://ceo.ocgov.com/sites/ceo/files/2023-02/TAY%20Collaborative%20Charter.pdf
[13] Veterans Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Veterans%20Committee%20Governance%20Charter.pdf

coordinate efforts to better serve veterans and their families in becoming permanently housed and achieving housing stability.

The County serves as the Coordinated Entry System (CES[14]) Lead for the Orange County CoC and is responsible for the implementation of a CES that address the needs of persons experiencing homelessness in Orange County, including adult only households, families with minor children, veterans, and Transitional Aged Youth. The primary goal of CES is to facilitate a participant-centered process that streamlines access to the most appropriate services and housing interventions for individuals experiencing homelessness or at risk of experiencing homelessness in Orange County. The CES aims to meet individualized preferences and needs with the goal of supporting participants return to stable housing. Persons experiencing homelessness and at risk of experiencing homelessness gain access to housing and supportive services more seamlessly through regionally coordinated access. The County has widely adopted the utilization of the CES to prioritize emergency shelter, interim housing, permanent housing, and supportive services.

Homeless needs and priorities continue to be identified through the Orange County CoC system. All CoC committees are public and inclusive of the participation of all stakeholders including homeless and formerly homeless individuals. In addition, the CoC consults with and engages homeless individuals to participate in the Point-in-Time Count and Survey of the homeless and the various committees and subcommittees of the CoC to address the emergency shelter and transitional housing needs of homeless persons. Most recently, the Orange County CoC established a Lived Experience Advisory Committee to ensure that the voices and perspectives of individuals with current and/or past lived experience of homelessness are heard and considered in the decision-making process of the CoC Board and provide a way to share recommendations and feedback on the CoC's programs and services. The CoC aims to build a diverse and inclusive Committees and as such is currently actively recruiting members for the various Committee.

The Homeless System of Care is established to create and provide services to those experiencing homelessness by working collaboratively with a variety of supportive services that can address the current needs and barriers with a goal of self-sufficiency and a permanent home. The system also aims to prevent recurring episodes of homelessness by ensuring individuals are connected to wrap around services and community services. In Orange County, a variety of private, federal, state, and county-funded programs offer job training courses, childcare, work appropriate clothing, food donations and/or meals, among other services. Many of these services are aimed to follow clients. The County of Orange continues to work on addressing and reducing homelessness countywide. Part of the implementation of programs established to serve the population is setting goals and meeting milestones to track progress. As such, the County of

[14] Coordinated Entry System - https://ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system

Orange in partnership with the Orange County CoC have developed a Local Homelessness Action Plan[15], which includes:

- Landscape Analysis of Needs
- Demographics, and Funding
- Analysis of People Being Served by the Homeless Service System
- Outcome Goals and Strategies to meet Outcome Goals
    - Reducing the number of persons experiencing homelessness.
    - Reducing the number of persons experiencing homelessness on a daily basis.
    - Reducing the number of persons who became newly homeless.
    - Increasing the number of people exiting homelessness into permanent housing.
    - Reducing the length of time persons remain homeless. Reducing the number of persons who return to homelessness within two years after exiting homelessness to permanent housing.
    - Increasing successful placements from street outreach.
- Funding Plans and Priorities that support the outcome goals and address needs and gaps within the homeless response system

Emergency Shelters, Transitional Housing, and Supportive Housing

Emergency shelters are facilities that provide a safe alternative to the streets either in a shelter facility, or through the use of motel vouchers. Emergency shelter stays are short-term, usually for six months or less. Transitional housing is longer-term emergency housing, typically six months up to two years with the goal of participants transitioning to permanent housing upon program exit. Transitional housing requires that the resident participate in a structured program to work toward the established goals so that they can move on to permanent housing. Participants are often provided with an array of supportive services to assist them in meeting goals. Supportive Housing is longer term permanent housing that provides supportive services to ensure housing stability for participants.

It should be recognized that most of the homeless population (as well as the services needed by these individuals) are found in the urbanized core of the county, most of which is within incorporated cities. This pattern continues as Unincorporated land is annexed or incorporated

[15] Local Homeless Action Plan as submitted in HHAP Round 4 application - https://bcsh.ca.gov/calich/documents/hhap_round4/counties/orange.pdf

into new cities. Therefore, it is appropriate that most of the facilities for this population are also located in the cities. As with other categories of housing assistance, OC Community Resources takes a broad perspective that includes more than just the Unincorporated areas, and many housing programs and affordable housing developments located in cities have been assisted by the County in recent years (see **Table A-2** in Appendix A).

SB 2 (2007) strengthened the planning requirements for emergency shelters and transitional/supportive housing. The bill requires jurisdictions to evaluate their needs for shelters compared to available facilities to address the need. Jurisdictions must also designate at least one location where a year-round shelter can be accommodated. It is estimated that the need for emergency shelter beds in the Unincorporated areas is for approximately 53 persons (see discussion in Section 2 – Community Profile and Needs). In order to encourage and facilitate the establishment of additional facilities, the Zoning Code amendment to allow shelters by-right in the commercial and industrial portions of the Housing Opportunities Overlay Zone was adopted by the Board of Supervisors in 2013.

There are approximately 153 acres of commercial and industrial zones eligible for by-right emergency shelter development under the Housing Opportunities Overlay Zone. According to the OC Housing Opportunities Manual, an emergency shelter or multi-service center shall comply with the site development standards of the base district. In the event of a conflict between the base district regulations and these standards, the provisions of section 7-9-44 shall control. The following lists standards and requirements for emergency shelters:

- A Management and Operations Plan shall be submitted for review and approval prior to operation of the emergency shelter or multi-service center.
- The Management and Operations Plan shall be in compliance with the provisions of the Orange County Housing Opportunities Manual.
- No facility shall be permitted less than 300 feet from another emergency shelter or multi-service center, measured from the nearest property lines.
- Emergency shelters may have a maximum of fifty (50) beds. Larger emergency shelters, up to a maximum of 150 beds, may be permitted subject to approval of a Use Permit per section 7-9-125.
- Off-street parking shall be provided at a rate of one (1) space per four (4) beds, plus one (1) space for each staff person (paid or volunteer) on duty.
- Bike racks shall be provided on site for use by staff and clients.
- An emergency shelter or multi-service center shall be open 24 hours a day unless an exemption is granted.
- Maximum consecutive length of stay shall be 180 days.

Low Barrier Navigation Centers

California Assembly Bill 101 (AB 101) states that "The Legislature finds and declares that Low Barrier Navigation Center developments are essential tools for alleviating the homelessness crisis in this state and are a matter of statewide concern-." 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 multifamily uses if it meets specified requirements. On September 27, 2022, the Orange County Zoning Code was amended to comply with State regulations on Low Barrier Navigation Centers (AB 101) to ensure Low Barrier Navigation Centers are allowed by-right in all zones that permit mixed-uses and non-residential uses. The existing Bridges at Kraemer Place and Yale Navigation Center both meet the criteria of Low Barrier Navigation Centers, as described above.

Inventory of Homeless Facilities

The facility and service need of families and individuals experiencing homelessness generally include emergency shelter, transitional housing, permanent supportive housing, and supportive services such as job training and counseling, behavioral and general health services.

Emergency shelters often provide accommodation for a few days up to six months. Transitional housing provides shelter for an extended period of time (as long as 24 months) and generally includes integration with other social services and counseling programs that assist people in increasing their income and securing long-term housing. Permanent supportive housing is rental housing for low-income or people experiencing homelessness in addition to a long-term disabling condition such as severe mental illness, substance abuse disorder, or HIV/AIDS with accompanying supportive services that also further self-sufficiency and housing stability. In Orange County, permanent supportive housing is prioritized for individuals who are experiencing chronic homelessness, which is defined as being homeless for a year or longer continuously, or on three separate occasions totaling 12 months, and having a long-term disabling condition.

The landscape of homeless services has changed significantly in Orange County since 2016, as the County and City jurisdictions have made significant investments in the development of emergency shelter, affordable housing, and permanent supportive housing programs to address the needs of individuals and families experiencing homelessness. As of January 2021, a network of nonprofit organizations and local governments operates 59 emergency shelter programs (including those operating in response to COVID-19), 42 transitional housing programs, and 31 permanent supportive housing programs within Orange County. Specifically, the County, individual jurisdictions, and numerous agencies oversee a total of 2,857 beds in emergency

shelters (**Table 2-47**), 899 beds in transitional housing shelters (**Table 2-48**) and 2,602 beds in permanent supportive housing settings (**Table 2-49**). Currently, 646 permanent supportive housing and affordable housing units are under development.

Unlike cities, the County plays a regional role in providing services to persons and families experiencing homelessness. The County-contracted facilities, such Bridges at Kraemer Place and the Yale Navigation Center that provides emergency shelter for adults experiencing homelessness, is located outside of the County's jurisdictional boundary but serves individuals from throughout the County, including the Unincorporated areas. In addition, the Orange County Office of Care Coordination coordinates the grant application process through which local homeless service providers receive over $23 million in federal funding annually for the Continuum of Care Program. The Orange County Office of Care Coordination also serves as the administrative entity for the Orange County Continuum of Care for State funding to address homelessness.

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children
1736 Family Crisis Center	SSVF EHA	C	NA	0	0	0
American Family Housing	Stanton Inn	C	NA	0	70	0
American Family Housing	Tahiti Motel Operations	U	NA	0	58	0
American Family Housing	Washington House	C	NA	0	16	0
Build Futures	Emergency Housing for Youth	C	NA	0	0	0
Casa Teresa	Emergency Maternity Shelter	C	NA	6	11	0
Casa Youth Shelter	Basic Center Group	C	NA	0	0	12
City Net	Santa Ana Armory	C	NA	0	0	0
CoC FEMA	CoC-Funded FEMA COVID-19	C	NA	0	0	0
Colette's Children's Home	Placentia Hope Emergency Shelter	C	NA	12	0	0
Family Assistance Ministries	Family House	C	NA	32	0	0
Family Assistance Ministries	Gilchrist House – Families	C	NA	9	0	0
Family Assistance Ministries	Project Room Key	C	NA	0	0	0
Friendship Shelter	Alternate Sleeping Location	C	NA	0	30	0
Friendship Shelter	Alternative Sleeping Location Drop-Offs	C	NA	0	0	0
Friendship Shelter	Bridge Housing Program	C	NA	0	28	0
Friendship Shelter	Safe Spaces	C	NA	0	2	0
Grandma's House of Hope	Bridge Re-Entry	C	NA	0	12	0
Grandma's House of Hope	Emergency Shelter CESH	C	NA	0	13	0
Grandma's House of Hope	Women's Emergency Shelter	C	NA	0	25	0
Human Options	Family Healing Center	C	DV	16	0	0
Human Options	Human Options Emergency Shelter	C	DV	29	0	0
Illumination Foundation	Fullerton Navigation Center	U	NA	0	90	0

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children
Illumination Foundation	Gilbert House	C	NA	15	0	0
Illumination Foundation	La Mesa Emergency Shelter	C	NA	12	90	0
Illumination Foundation	Murphy House	C	NA	28	0	0
Illumination Foundation	Recuperative Care Program - Broadway	U	NA	0	62	0
Illumination Foundation	Recuperative Care Program - MIDWAY	C	NA	0	30	0
Illumination Foundation	Temporary Isolation Shelter - Orange/Anaheim	C	NA	0	0	0
Illumination Foundation	The Link	C	NA	40	160	0
Illumination Foundation	Theriault House	C	NA	36	0	0
Interval House	Emergency Shelter	C	DV	68	3	0
Jamboree	Anaheim House	C	NA	0	6	0
Laura's House	Laura's Domestic Violence Emergency	C	DV	18	2	0
Mercy House	Bridges at Kramer Place	C	NA	0	142	0
Mercy House	Buena Park Emergency Shelter	C	NA	0	103	0
Mercy House	Costa Mesa Bridge Shelter	C	NA	0	29	0
Mercy House	Family Care Center	C	NA	36	0	0
Mercy House	FEMA - Costa Mesa	C	NA	0	0	0
Mercy House	FEMA - Santa Ana	C	NA	0	0	0
Mercy House	Huntington Beach Navigation Center	C	NA	0	124	0
Orange County Rescue Mission	ES Village of Hope	C	NA	33	33	0
Orange County Rescue Mission	Tustin Temporary Emergency Shelter	C	NA	9	48	0
PATH	Placentia Navigation Center	C	NA	0	100	0
PATH	Yale Navigation Center	U	NA	0	425	0
Pathways of Hope	New Vista Emergency	C	NA	44	0	0
Pathways of Hope	Via Esperanza	C	NA	45	0	0
Precious Life Shelter	Emergency Shelter	C	NA	0	6	0
Radiant Health Centers	Short Term Supportive Housing	C	HIV	0	0	0
Salvation Army	Anaheim Emergency Shelter	C	NA	0	325	0
Salvation Army	Salvation Army - FEMA Project	C	NA	0	28	0
The Eli Home	The Eli Home CARP Residential Recovery Shelter Program	C	DV	18	0	0
The Midnight Mission	Courtyard in OC	C	NA	0	238	0
US Veterans Initiatives	SSVF EHA	C	NA	0	0	0
Volunteers of America	SSVF EHA	C	NA	0	0	0
Waymakers	Huntington Beach Youth Shelter	C	NA	0	0	4
WISEPlace	Safe Place	C	NA	0	30	0
Women's Transitional Living Center	45 Day Emergency Shelter	C	DV	37	0	0
Women's Transitional Living Center	Safety Net	C	DV	3	3	0

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

Table 2-48
Transitional Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds
Build Futures	Emergency Housing for Youth	C	NA	0	0	0	0
Casa Teresa	Casa Teresa Parenting Program	C	NA	0	14	0	14
Casa Teresa	Casa Teresa Transformation I Program	C	NA	4	0	0	4
Casa Teresa	Casa Teresa Transformation II Program	C	NA	5	0	0	5
Colette's Children's Home	CCH Ariel Place/Anaheim	C	NA	9	0	0	9
Colette's Children's Home	CCH Cypress Street #2/Placentia	C	NA	8	2	0	10
Colette's Children's Home	Colette's Children's Home #1	C	NA	12	2	0	14
Colette's Children's Home	Colette's Children's Home #2	C	NA	12	1	0	13
Colette's Children's Home	Colette's Children's Home #3	C	NA	9	0	0	9
Colette's Children's Home	Cypress/Placentia III	C	NA	9	0	0	9
Colette's Children's Home	Dairyview	C	NA	12	2	0	14
Families Forward	I-Transitional Housing - Irvine	C	NA	4	0	0	4
Families Forward	I-Transitional Housing- Lake Forest	C	NA	12	0	0	12
Family Assistance Ministries	Gilchrist House - Individuals	C	NA	0	8	0	8
Grandma's House of Hope	GHH Men's Recovery Residence	C	NA	0	13	0	13
Grandma's House of Hope	GHH Men's Transitional Short Term Housing	C	NA	0	6	0	6
Grandma's House of Hope	Healing House	C	NA	0	12	0	12
Grandma's House of Hope	Men's Bridge	C	NA	0	10	0	10
Grandma's House of Hope	VOCA XH	C	NA	0	11	0	11
Grandma's House of Hope	Women's Bridge	C	NA	0	20	0	20
HIS House	CHESS - TAY	C	NA	0	14	0	14
HIS House	HIS House Transitional	C	NA	48	0	0	48
Human Options	Second Step	C	DV	48	0	0	48
Laura's House	Laura's Domestic Violence Transitional Housing Program	C	DV	7	0	0	8
Mary's Shelter	Transitional Living for Homeless Youth	C	NA	0		30	30
OC Gateway to Housing	Transitional Housing Program - Tustin	C	NA	28	0	0	28
OC Gateway to Housing	Transitional Housing Program- Santa Ana	C	NA	8	0	0	8
One Step Ministry	Our House	C	NA	9	0	0	9

Table 2-48
Transitional Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds
Orange County Rescue Mission	Hope Family Housing-Buena Park	C	NA	65	0	0	65
Orange County Rescue Mission	House of Hope	C	NA	45	0	0	45
Orange County Rescue Mission	TH Village of Hope	C	NA	98	98	0	196
Orange County Rescue Mission	Tustin Veteran's Outpost	C	NA	16	10	0	26
Precious Life Shelter	Transitional Program	C	NA	25	0	0	25
Salvation Army	Transitional Housing - Buena Park	C	NA	6	0	0	6
Salvation Army	Transitional Housing - Tustin	C	NA	9	0	0	9
South County Outreach	SCO Transitional Housing - Laguna Niguel	C	NA	3	0	0	3
South County Outreach	SCO Transitional Housing - Lake Forest	C	NA	21	0	0	21
South County Outreach	SCO Transitional Housing - Mission Viejo	C	NA	6	0	0	6
Thomas House	2nd Step	C	NA	12	0	0	12
Thomas House	Thomas House Homeless Family Shelter #10	C	NA	64	0	0	64
WISEPlace	Positive Steps House	C	NA	0	5	0	5
WISEPlace	Steps to Independence	C	NA	0	19	0	19
Women's Transitional Living Center	Transitional Housing	C	DV	7	0	0	7

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children
YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

Table 2-49
Permanent Supportive Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds	PIT Count	Total Beds
American Family Housing	Permanent Housing 2	C	NA	31	7	0	38	39	38
American Family Housing	Permanent Housing Collaborative	C	NA	36	8	0	44	40	44
Anaheim Supportive Housing	Tyrol Plaza	C	NA	0	12	0	12	12	12
Friendship Shelter	Henderson House Permanent Supportive Housing	C	NA	0	35	0	35	34	35
Illumination Foundation	SHP Stanton Multi-Service Center	C	NA	8	22	0	30	34	30
Illumination Foundation	Street 2 Home	C	NA	49	96	0	145	142	145
Jamboree	Diamond Apartments	C	NA	27	15	0	42	33	42
Jamboree	Doria Apartment Homes	C	NA	6	18	0	24	23	24

Table 2-49
Permanent Supportive Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds	PIT Count	Total Beds
Jamboree	Heroes Landing	C	NA	15	70		85	86	85
Mercy House	AFH PSH Collaboration II	C	NA	0	7	0	7	7	7
Mercy House	CCH PSH Collaboration II	C	NA	0	1	0	1	1	1
Mercy House	CCH PSH Collaborative	C	NA	0	1	0	1	1	1
Mercy House	CoC Leasing	C	NA	9	13	0	22	26	22
Mercy House	FAM PSH Collaboration II	C	NA	0	12	0	12	12	12
Mercy House	FSI PSH Collaboration	C	NA	0	39	0	39	38	39
Mercy House	FSI PSH Collaboration II	C	NA	0	17	0	17	17	17
Mercy House	MCY PSH Collaboration II	C	NA	12	16	0	28	27	28
Mercy House	MCY PSH Collaborative	C	NA	12	106	0	118	140	118
Mercy House	Mills End and PSH Leasing Consolidation	C	NA	2	19	0	21	23	21
Mercy House	POH PSH Collaboration II	C	NA	0	20	0	20	20	20
Mercy House	The Aqua	C	NA	0	56	0	56	2	56
Orange County Housing Authority	#1 Consolidated Shelter Plus Care TRA	C	NA	153	123	0	276	329	276
Orange County Housing Authority	#2 Consolidated CoC TRA	C	NA	69	54	0	123	120	123
Orange County Housing Authority	#3 Consolidated CoC TRA	C	NA	99	84	0	183	179	183
Orange County Housing Authority	#4 Consolidated CoC TRA	C	NA	91	61	0	152	132	152
Orange County Housing Authority	Jackson Aisle	C	NA	0	29	0	29	27	29
Orange County Housing Authority	Placentia Veterans Village	C	NA	12	45	0	57	47	57
Orange County Housing Authority	Potter's Lane PB VASH	C	NA	0	8	0	8	9	8
Orange County Housing Authority	Salerno VASH	U	NA	20	11	0	31	0	31
Orange County Housing Authority	VASH	C	NA	574	397	0	971	949	971
Orange County Housing Authority	VASH Project-Based Vouchers - Newport Veteran's Housing	C	NA	0	6	0	6	6	6

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children
YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

The County typically funds one seasonal emergency shelter which has historically been in a State National Guard armory in the Central Service Planning Area. This shelter has provided up to 200 emergency shelter beds each night during the winter months. Along with beds, these shelters provide shower facilities and meals to individuals and families experiencing homelessness.

Additionally, the County funds the operations of two year-round emergency shelter programs for individuals experiencing homelessness, Bridges at Kraemer Place, and the Yale Navigation Center. Bridges at Kraemer Place provides 200 beds of emergency shelter in the North Service Planning Area and the Yale Navigation Center provides 425 beds of emergency shelter in the Central Service Planning Area. Both programs have a large emphasis on housing-focused case management and supporting participants in accessing needed resources and supportive services to assist them in securing appropriate housing options. The County is committed to supporting cities that operate their own emergency shelters and promoting coordination to increase access to shelter beds amongst the unsheltered population. There is one year-round program located in the Unincorporated areas of the County. American Family Housing leases space to the Illumination Foundation for the provision of 18 transitional housing units in Midway City.

Farm Workers

As defined in the County of Orange Zoning Code, a farm worker is an employee engaged in agriculture, which includes farming in all its branches, including preparation for market and delivery to storage or to market or to carriers for transportation to market. Historically Orange County's economy was linked to agriculture. While there are still active farming areas on the Irvine Ranch, Rancho Mission Viejo, and in some cities, shifts in the local economy to production and service-oriented sectors have significantly curtailed agricultural production within the county. Today, Orange County is a mostly developed urban/suburban area, with a strong local economy. Although the county is increasingly capturing major employers in Southern California, this growth is not tied to an agricultural base.

Recent U.S. Census Bureau estimates reported about 169 persons employed in agricultural occupations in Unincorporated Orange County. This represents about 0.17% of all occupations in Unincorporated Orange County (**Table 2-50**).

Table 2-50
Agricultural Employment –
Unincorporated Orange County, Orange County, and SCAG Region

Employment By Occupation	Unincorporated Orange County	% of Unincorporated Orange County	Orange County	SCAG Region Total
Total Jobs: Farming, Fishing, and Forestry Occupations	109	0.17%	5,823	57,741
Full-Time, Year-Round Jobs: Farming, Fishing, and Forestry Occupations	60	0.14%	3,246	31,521
Total Jobs in Agriculture, Forestry, Fishing, and Hunting Industry	179	0.28%	7,744	73,778
Full-Time, Year-Round Jobs in Agriculture, Forestry, Fishing, and Hunting Industry	N/A	N/A	5,256	44,979

Source: SCAG Local Housing Pre-Certified Local Housing Data 2020, American Community Survey, 5-Year Estimates, 2018

The U.S. 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 per year, represent the largest category of workers with 1,106 workers (62%). A total of 666 workers (38%) are considered seasonal and work less than 150 days per year. Orange County reported 340 migrant workers (19%) with full time hired labor in 2017. In addition, the County reported 176 unpaid workers.

While there is still significant agricultural production on the Irvine Ranch and Rancho Mission Viejo, farmland has steadily decreased in recent decades and thus, the need for farm worker housing is not as great as it once was.

Consistent with California Health and Safety Code Sections 17021.5 and 17021.6, the County's Zoning Code provides that agricultural employee housing is permitted by-right, without a Use Permit (UP), in single-family zones for six or fewer persons and in agricultural zones with no more than 12 units or 36 beds. The Orange County Zoning Code currently permits farm worker housing in the A1 (General Agricultural) District with the approval of a Site Development Permit (SDP).

Analysis of Special Housing Needs and Housing Element Resources for Special Needs Groups

As the tables in the Special Housing Needs section above demonstrate, the Unincorporated areas of the County appear to be in need of extremely low, very low, and low-income housing. In addition, the data reveals that the Unincorporated County requires housing to address the special needs of the senior population over 65. In addition, a greater stock of housing that is larger than 4 bedroom, or more multifamily housing units, would alleviate some of the overcrowding and pricing concerns that are evident in some areas of the Unincorporated County. Due to the low populations of disabled persons under 65 and farmworkers, housing to address these special needs populations are lower priority.

Appendix A provides accomplishments relating to improving the housing needs of these special needs groups. The County continues to work with the community and housing developers to find solutions to create accessible new housing options and better understand the unique needs of community members. As such, the County has included the programs in the Housing Action Plan to provide for accessible housing.

3. CONSTRAINTS

Governmental Constraints

Land Use Plans and Regulations

General Plan

Each city and county in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of the General Plan establishes the basic land uses and density of development within the various areas of the County. Under state law, the General Plan elements must be internally consistent, and the County's zoning must be consistent with the General Plan. Thus, the land use plan must provide suitable locations and densities to implement the policies of the Housing Element. The Orange County General Plan Land Use Element provides for four residential land use designations, as shown in **Table 3-1**.

Table 3-1
Residential Land Use Categories –
Orange County General Plan Land Use Element

Designation	Maximum Density[1]	Description
Rural Residential (1A)	.025 – 0.5 du/ac	Limited residential use compatible with the natural character of the terrain.
Suburban (1B)	0.5 – 18 du/ac	Wide range of housing types, from estates on large lots to attached dwelling units (townhomes, condominiums, and clustered arrangements)
Urban Residential (1C)	18.0 and above du/ac	Applied to areas where intensive residential development is compatible with surrounding urban development. Characterized by intensive residential uses such as apartments, condominiums, townhomes, and clustered residential units.
Urban Activity Center (6)	18+[2]	Identifies locations intended for high-intensity mixed-use development. Intended to facilitate a more efficient use of transportation systems, conserve energy resources, and develop residential densities that enhance the ability to provide affordable housing.

Source: Orange County General Plan.
[1]Density expressed in dwelling units per net acre.
[2]Special development regulations apply to ensure that the ultimate development pattern is consistent with the intent of the category.

The Land Use Element of the Orange County General Plan designates approximately 72,382.63 gross acres (41%) of the Unincorporated County's total land inventory (excluding Cleveland National Forest) for residential uses, providing for a range of residential types and densities throughout the Unincorporated County.

The maximum gross residential density in the Suburban Residential (1B) land use category is 18 dwelling units per acre, excluding any allowable density bonus. Gross density typically includes

street rights-of-way, utility easements, local parks, and other community infrastructure. Net densities, including allowable density bonus, are based on net parcel size and therefore may be significantly higher. Maximum densities within the Urban Residential (1C) and Urban Activity Center (6) land use categories are regulated by the applicable zoning, as well as by infrastructure and environmental constraints. The County's approach to accommodating affordable housing has not solely been dependent on achieving high densities, but also on maintenance of a higher-than-average number of multifamily units as a proportion of total units, and upon successful leverage of state and federal subsidies for affordable housing. Residential developers have generally proposed projects that do not meet the maximum allowable density due to the economics of development. Development standards do not inhibit proposed projects from reaching the maximum density.

Pursuant to California Assembly Bill (AB 2348) (2004), the "default density" for most Orange County jurisdictions, including the Unincorporated County, is 30 dwelling units per acre[16]. The default density refers to the density at which lower-income housing development is presumed to be feasible, although state law allows jurisdictions to propose alternative densities that are sufficient to facilitate affordable housing based on local experience and circumstances.

The Orange County General Plan is not considered to be a constraint to the goals and policies of the Housing Element as the County's zoning is consistent with the General Plan and adequate sites with appropriate densities have been identified to permit the construction of the County's fair share of new housing units for the 2021-2029 planning period. Under the Housing Opportunities Overlay Regulations (section 7-9-44) adopted in 2020, affordable housing developments are permitted by-right at a density up to 43.5 units per acre, excluding density bonus.

To meet the requirement that the County complete any necessary rezoning to meet its RHNA by October 15, 2022, on September 27, 2022, the Board of Supervisors adopted an amendment to the Housing Opportunities Overlay Zone regulations to increase the base density to 70 units per acre, excluding any applicable density bonus.

Since the January 10, 2006 adoption of the Housing Opportunities Overlay Zone, eight (8) projects have been built (within the Housing Opportunities Overlay Zone) which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families. Those projects, with densities between 30 and 63.4 units per acre, include affordable units at the 30%, 50% and 60% AMI level and demonstrate that lower-income housing is feasible under current regulations (see further discussion in Appendix B, Land Inventory).

[16] Memo of June 9, 2005 from California Department of Housing and Community Development on AB 2348 of 2004.

Zoning Ordinance

Zoning regulations serve as a key General Plan implementation tool. The County's Zoning Code accommodates a diversity of residential housing types. As addressed in Section 2, the County has made efforts to remove as many constraints as possible from the Zoning regulations; however, existing regulations can pose a barrier to the existence of affordable housing. It allows for innovation in design standards within parameters designated on Land Use Element, Table III-1 provided the overall density and dwelling unit capacity is not exceeded. The Orange County Zoning Code provides for 17 residential zoning districts, as listed below:

- A1 "General Agricultural" District
- AR "Agricultural Residential" District
- E1 "Estates" District
- RHE "Residential Hillside Estates" District
- E4 "Small Estates" District
- H "Housing Opportunities" Overlay District
- MX "Mixed-Use" District
- RE "Residential Estates" District
- R1 "Single-Family Residence" District
- RS "Residential, Single-Family" District"
- R2 "Multifamily Dwelling" District
- R3 "Apartment" District
- R4 "Suburban Multifamily Residential" District
- PC "Planned Community" District
- PD "Planned Development" Combining District

Of the 17 residential use zoning districts (including A1 General Agricultural), multifamily projects of four units or less are permitted by-right in the R2, R3 and R4 zones, as well as in Planned Community Districts. Single-family dwellings are allowed in all residential zones in the County. Allowable densities in these zones range from 0.4 units/acre in the A1 zone up to 43 units/acre in the R2 and R3 zones. The height limit is 35 feet in all zones except R3, which allows up to 65 feet. Please see **Table 3-2** for a summary of the applicable development standards in these zoning districts. Notwithstanding the number of zoning districts identified, however, the overwhelming majority of development approved within the Unincorporated County was accomplished under the PC "Planned Community" District.

Planned Community District: One particularly effective component of the County's zoning regulations is the Planned Community (PC) designation. In general, each planned community is subject to the standard provisions of the Zoning Code. The purpose of this district is to provide the authority, regulations and procedures whereby large land areas can be planned, zoned, developed, and administered as individual, integrated communities. It is intended that each planned community will be developed to take maximum advantage of its location, environment, and physical features. Several of these planned communities are also the subject of development agreements, which identify the levels of development allowed and important public facilities that will accompany development.

Rancho Mission Viejo Planned Community: The most recently approved Planned Community is Rancho Mission Viejo (RMV), approved by the Board of Supervisors on November 8, 2004. Rancho Mission Viejo is located in southeastern Orange County east of San Juan Capistrano and north of San Clemente. Rancho Mission Viejo includes the development of 5,768 acres of the 22,683-acre Planned Community with a maximum of 14,000 dwelling units, 6,000 of which are forecasted to be age restricted, and 5.2 million sq. ft. of employment floor area. The remainder of Rancho Mission Viejo, 16,915 acres, is planned to remain as protected, permanent open space. Build-out of the planned community is expected in approximately 20 years.

As is the case with nearly all planned communities approved in Orange County, Rancho Mission Viejo is subject to a Development Agreement between the County and the landowner. The Ranch Plan Development Agreement requires that the developer offer for dedication an aggregate of 60 gross acres of land to the County, which would be graded and improved for the County's development of low-income rental housing. In July 2006 the County and property owner entered into an Affordable Housing Implementation Agreement (AHIA), or as may be supplemented, that delineates the process for transferring the property to the County for development. Development assumptions for Rancho Mission Viejo are discussed in greater detail in Appendix B – Land Inventory.

Since the grand opening of Planning Area 1 in 2013, Rancho Mission Viejo and neighborhood builders have completed and sold/rented 1,247 housing units in Sendero PA1, of which 286 are deed-restricted senior housing (Age Qualified) units. In addition, 107 senior affordable apartments have been leased. Since the grand opening of PA2 in 2015 and through the end of 2019, Rancho Mission Viejo and neighborhood builders have obtained building permits for 2,507 market rate units in Esencia PA2, and occupancy permits (closings) for 2,475 market rate units, of which 830 have been deed-restricted senior housing (Age Qualified) units. In addition, a 112-unit affordable family apartment project has been leased. Planning Area 3.2a was issued certificates of occupancy in January 2023 and includes 145 deed-restricted senior housing (Age Qualified) and 134 market-rate, for sale units. Planning Area 3.2b has been approved with six neighborhood builders for a total of 514 units.

Mixed-Use Overlay District: Another particularly effective component of the County's zoning regulations is mixed-use development, which is permitted in the MX district. In contrast to single-use zones, mixed-use combines residential with retail, office, commercial and/or entertainment developments. Mixed-use not only allows residents to live, work, and shop within walking distance, it strengthens the economy with an employee and retail base for local businesses. Mixed-use is especially beneficial for communities lacking vacant residential sites, creating the opportunity for new housing through infill development and decreasing housing costs through shared amenities and parking.

The County's MX "Mixed-Use" Overlay District provides the opportunity to develop high density housing in commercial areas and requires residential uses for fifty percent (50%) of the total floor area. These regulations are intended to facilitate the vertical and horizontal mixing of retail, office, and residential uses and development of mixed-use buildings accommodating both residential and employment activities. In both infill contexts and in larger projects, these regulations shall facilitate the inclusion of cultural, civic, education, and urban recreational uses and support transit-oriented development and alternative modes of transportation.

A summary of the development standards for the 17 zoning districts permitting residential development is provided in **Table 3-2**. These development standards are reasonably necessary to protect the public health, safety and welfare and maintain the quality of life, and are not considered to be constraints to the development of housing. For additional details, development standards for each zoning district are available on the County's website, per Government Code 65940.1(a)(1)(B).

Table 3-2
Summary of Residential Zoning Regulations
County of Orange (Unincorporated Areas)

Zoning Districts	Site Coverage	Min. Land Area per Unit/ Max. Density	Height Limit	From Ultimate Street R/W Line			From Property Line Not Abutting Street		On Panhandle Building Site from Any Property Line
				Front	Side	Rear	Side	Rear	
A1 "General Agricultural" District	NA	4 acres/ 1 du/ac	35 ft.	20	5	25	5	25[4]	10
AR "Agricultural Residential" District	35	7,200 sq.ft./ 6.1 du/ac	35 ft.	20	5	25	5	25[4]	10
E1 "Estates" District	35	1 acre/ 1.0 du/ac	35 ft.	45	20	50	20	50[4]	10
RHE "Residential Hillside Estates" District	35	10,000 sq.ft./ 4.4 du/ac	35 ft.	10	8	25	8	25[4]	10
E4 "Small Estates" District	35	10,000 sq.ft./ 4. 4-du/ac	35 ft.	30	note[1]	25	note[1]	25[4]	10
H "Housing Opportunities" Overlay District[5]	NA	Up to 70 du/ac	65 ft.	20	note[2]	25	note[2]	25[4]	10
MX "Mixed-Use" Overlay District[5]	NA	Up to 33 du/ac	note[5]	note[5]	note[5]	note[5]	note[5]	note[5]	note[5]
RE "Residential Estates" District	35	20,000 sq.ft./ 2.2 du/ac	35 ft.	40	note[1]	25	note[1]	25[4]	15
R1 "Single-Family Residence" District	NA	7,200 sq.ft./ 6.1 du/ac	35 ft.	20	5	25	5	25[4]	10
RS "Residential, Single-Family District"	35	7,000 sq.ft./ 6.2 du/ac	35 ft.	10	10	10	note[3]	0	10
R2 "Multifamily Dwelling" District	NA	1,000 sq.ft./ 43.5 du/ac	35 ft.	20	5	25	5	25[4]	10
R3 "Apartment" District	NA	1,000 sq.ft./ 43.5 du/ac	65 ft.	20	note[2]	25	note[2]	25[4]	10
R4 "Suburban Multifamily Residential" District	NA	3,000 sq.ft./ 14.5 du/ac	35 ft.	20	5	25	5	25[4]	10
PC "Planned Community" District	For each proposed Planned Community, a specific PC Program Text shall be adopted by ordinance that specifies land use regulations and procedures applicable to all areas within the boundaries of the planned community.								
PD "Planned Development" Combining District	In any district where the district symbol is followed by, as a part of such symbol, the letters "(PD)," planned development projects shall be permitted subject to the use regulations, development standards, and other provisions. Projects located within this district that are not a planned development, or not part of a planned development, shall comply with the regulations of the base district and are not subject to the provisions of this section.								

Notes:
[1]Ten (10) percent average ultimate net width of building site-Maximum twenty (20) feet.
[2]Five (5) feet; add one (1) foot for each additional story over two (2).
[3]Ten (10) feet on one side only or ten (10) feet total of two (2) sides combined.
[4]In computing the depth of a rear set back from any building where such setbacks open on an alley, private street, public park or public beach, one-half of the width of such alley, street, park or beach may be deemed to be a portion of the rear setback, except that under this provision, no rear setback shall be less than 50 feet.
[5]H "Housing Opportunities" Overlay District and MX "Mixed-Use" Overlay District: Sites shall comply with the base district site development standards.
Source: County of Orange Zoning Code, 2020

Off-Street Parking Requirements

Parking is a necessary aspect of any development and can constrain the development of affordable housing. For every parking space that is required, there is less land available for development. Excessive parking requirements can thus drive up the cost of development. Parking requirements in the County, however, are similar to other jurisdictions and are not considered to be so stringent as to be a constraint to housing development. In addition, the County has adopted less-restrictive parking requirements applicable to affordable and senior citizen housing to facilitate their development. Furthermore, the Zoning Code provides additional opportunities for all developments to request alternatives to off-street parking regulations (section 7-9-70.9). Residential parking requirements for the County are displayed in **Table 3-3**.

The County's Zoning Code assigns parking standards with the intent to promote efficient land use. It is intended that these regulations will result in properly designed parking facilities of sufficient capacity to minimize traffic congestion, enhance public safety, generally provide for the parking of motor vehicles at locations other than on the streets, and for safe passage of pedestrians to and from parked vehicles.

Table 3-3
Residential Parking Requirements
County of Orange (Unincorporated Areas)

Type of Residential Development	Required Off-Street Parking Spaces	Comments
Attached / Detached Single-Family Dwellings	(a) Two (2) covered parking spaces required for each dwelling. (b) In addition to parking required in (a) above, additional parking spaces shall be provided as follows: (1) Those dwellings having less than an eighteen (18)-foot setback from the right-of-way (driveway), whichever is closest to the garage or carport, shall provide one (1) additional off-street parking space within two hundred (200) feet of the dwelling subject to location requirements in (f) "Location of residential parking spaces," below. (2) Those dwelling units located within a planned development shall provide an additional one-half (0.5) guest parking space per unit subject to (f) "Location of residential parking spaces," below. (3) Those dwellings with more than four (4) bedrooms shall provide an additional one-half (0.5) off-street parking space on the same parcel for each additional bedroom. In addition to the two (2) required covered spaces. If one additional space is required, if shall be covered. If more than one additional space is required, at least fifty percent (50%) of the additional spaces shall be covered and may be tandem spaces. (c) Those dwellings on streets that do not allow on-street parking shall provide one (1) additional off-street parking space within two hundred (200) feet of the unit subject to "Location of residential parking spaces," below.	For purposes of this section, a room such as a den, study or sewing room shall be considered a bedroom. One-half (0.5) and greater parking spaces shall be rounded up, less than one-half (0.5) shall be rounded down. All parking spaces are subject to location requirements in below.
Multifamily Dwellings	(a) Zero to one-bedroom dwelling units: One and one-half (1.5) off-street parking spaces for each dwelling unit. Except as otherwise provided in d. below, one (1) space shall be covered for each dwelling unit. (b) Two-bedroom dwelling units: Two (2) off-street parking spaces for each dwelling unit. Except as otherwise provided in d. below, one (1) of the spaces shall be covered for each dwelling unit. (c) Three or more-bedroom dwelling units: Two and one-half (2.5) off-street parking spaces for each dwelling unit, plus one-half (0.5) off-street parking space for each bedroom in excess of three (3). Except as otherwise provided in d. below, two (2) spaces shall be covered for each dwelling unit. (d) Notwithstanding the provisions of this subsection, the requirement that off-street parking spaces be covered is not applicable for multifamily projects of five (5) or more dwelling units. (e) Guest parking: In addition to the above, two-tenths (0.2) guest parking spaces per dwelling unit shall be provided.	For purposes of this section, a room such as a den, study or sewing room shall be considered a bedroom. One-half (0.5) and greater parking spaces shall be rounded up, less than one-half (0.5) shall be rounded down. All parking spaces are subject to location requirements below.
Affordable housing For projects where 100% of the units, excluding the Manager's Unit, are affordable to households earning 80% or less of the	**Minimum required parking spaces** **Unit Size (Square Feet)** / **Assigned** / **+** / **Unassigned** 700 or less / 1.0 / / - 701—800 / 1.0 / + / 0.17	

Table 3-3
Residential Parking Requirements
County of Orange (Unincorporated Areas)

Type of Residential Development	Required Off-Street Parking Spaces			Comments
Average Median Income (AMI) established by the California Department of Housing and Community Development (HCD) for the County of Orange	801—900	1.0	+	0.34
	901—1000	1.0	+	0.50
	1001—1100	1.0	+	0.67
	1101—1200	1.0	+	0.84
	1201—1300	1.0	+	1.00
	1301—1400	1.0	+	1.18
	1401—1500	1.0	+	1.34
	Over 1500	1.0	+	1.50
Senior housing (Also known as Senior Citizen Housing Development as defined by Civil Code 51.3 and 51.12, as may be amended.)	(a) Zero to one-bedroom dwelling units: One (1) off-street parking space (b) Two-bedroom to three-bedroom dwelling units: Two (2) off-street parking spaces (c) Four or more bedroom dwelling units: Two and one-half (2.5) off-street parking spaces for each dwelling unit (d) The number of required parking spaces shall be rounded up to the next whole number. (e) If there is any conflict between the senior housing parking requirements set forth in these zoning regulations and the senior housing parking requirements set forth in the State Density Bonus Law, the State Density Bonus Law parking requirements shall be used.			
Accessory dwelling units	One (1) additional parking space per accessory dwelling unit per the standards set forth in section 7-9-90 is required, except in the instances listed below. These spaces may be provided as tandem parking on an existing driveway. No additional parking space is required for an accessory dwelling unit in any of the following instances: (a) The accessory dwelling unit is located within one-half (0.5) mile of public transit. (b) The accessory dwelling unit is located within an architecturally and historically significant historic district. (c) The accessory dwelling unit is contained within the existing primary residence, an addition to the existing primary residence, newly built residence, or an existing accessory structure. (d) When on-street parking permits are required but not offered to the occupant of the accessory dwelling unit. (e) When there is a car share vehicle located within one block of the accessory dwelling unit. (f) If the accessory dwelling unit has no bedrooms (i.e. studio units).			
Location of residential parking spaces: 1) Required spaces including guest or unassigned spaces shall be off-street and located within two hundred (200) feet walking distance along a pedestrian path (i.e., sidewalk, crosswalk, etc.) of the dwelling unit they serve. 2) For "wrap-around" multifamily, multi-story residential developments, where the units surround an interior parking structure, the required spaces including guest or unassigned spaces shall be off-street and located within two hundred (200) feet of the elevator servicing the units. 3) Assigned spaces shall be designated as to the dwelling unit to which they are assigned on all plot plans submitted for permits.				
Source: County of Orange Zoning Code, 2020				

Special Needs Housing Constraints

Persons with special needs include those in residential care facilities, persons with disabilities, the elderly, farm workers, persons experiencing homelessness needing emergency shelter or transitional living arrangements, and single room occupancy units. In accordance with state law, the County does not require residential care facilities, community care facilities, alcoholism or drug abuse recovery treatment facilities, and congregate living health facilities, serving six or fewer residents to obtain any permits; such uses are not treated any differently from any other residential use of property. (See Health & Safety Code §§ 1267.16 [congregate living health

facilities], 1566.3 [community care and residential facilities], 1568.0831 [residential care facilities for persons with chronic life-threatening illness], 11834.23 [alcoholism or drug abuse recovery treatment facilities].). There are no constraints on housing for persons with disabilities for facilities serving six or fewer persons. State law allows, and the County requires, residential care facilities, community care facilities, alcoholism or drug abuse recovery treatment facilities, and congregate living health facilities, serving seven or more residents to obtain a Use Permit.

Housing for Persons with Disabilities

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

Reasonable Accommodation

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, and procedures, or 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 Code to ensure that homes are accessible for the mobility impaired. Whether a particular modification is reasonable depends on the circumstances.

To ensure maximum housing flexibility for persons with disabilities, the Orange County Zoning Code makes available reasonable accommodation for persons with disabilities based on the following factors:

- Whether the housing, which is the subject of the request for reasonable accommodation, will be used by an individual with disabilities protected under the law.
- Whether the requested accommodation is necessary to make housing available to an individual with disabilities protected under the law.
- Whether the requested accommodation would impose an undue financial or administrative burden on the County.
- Whether the requested accommodation would require a fundamental alteration in the nature of the County's land use and zoning or building program.

The Director, OC Development Services, is the reviewing authority of reasonable accommodation requests. The Director must notify the applicant within 30 days of an approved/denied request and make a written decision on the request within 60 days of the determination date (section 7-9-129). An appeal from the decision of the Director is allowed and would be heard by the Planning Commission. The County did not deny any requests for reasonable accommodation in the last (5th Cycle) planning period.

The County's Codified Ordinances contains the following provisions regarding housing for persons with disabilities:

- **Reasonable accommodation**. In addition to compliance with state and federal accessibility standards, including Title 24 and ADA requirements, Orange County has established reasonable accommodation procedures (sections 7-1-2 and 7-9-122).
- **Concentration limitations.** County codes do not establish maximum concentration requirements for residential facilities. Sober Living Homes are not permitted to be within 1,000 feet of one another (section 7-9-95.6) or with other Alcoholism or Drug Abuse Recovery/Treatment facilities (section 7-9-32.2/Table 7-9-32.2). No permits have been denied due to maximum concentration requirements.
- **Parking standards.** Parking standards are based on use (e.g., single or multifamily, community care facilities), not on the type of occupant. The Zoning Code establishes standards for the number of handicapped parking stalls, including location and dimensions (section 7-9-70).

In addition, the County's building codes require that new residential construction comply with the federal accessibility standards contained in the California Building Code (2022 Edition), California Residential Code (2022 Edition), California Green Building Standards Code (2022 Edition), 2022 California Energy Code and the International Building Code (2021 Edition). In addition, any residential units constructed directly by the County, as well as public accommodations, are subject to provision of the Americans with Disabilities Act (ADA). ADA provisions include requirements for a minimum percentage of units in new developments to be fully accessible to the physically disabled. Provision of fully accessible units may also increase the overall project development costs. Enforcement of ADA requirements is not at the discretion of the County but is mandated under federal law under certain conditions.

Because site development standards contained in the Zoning Code are consistent with building code accessibility requirements, the Zoning Code does not place regulatory constraints on housing for persons with disabilities.

Compliance with building codes and the ADA may increase the cost of housing production and can also impact the viability of rehabilitation of older properties required to be brought up to

current code standards. However, these regulations provide minimum standards that must be complied with to ensure the development of safe and accessible housing.

Definition of Family

The County does not have a definition of family in the Zoning Code. The County does define a single housekeeping unit, not in terms of familial relationships, but instead, to distinguish a for profit enterprise or business, such as a group home or integral facility, from a residential use (section 7-9-135.1). The County's Zoning Code permits group accommodation for unrelated persons by defining "household" broadly as *"all people occupying a single dwelling unit. A household shall also mean all people occupying two (2) dwelling units on the same site if both units are used as group homes owned or operated by the same owner." 'Household' includes the occupants of community care facilities serving six (6) or fewer persons which are permitted or licensed by the State."* (section 7-9-95.1). This definition does not place a constraint on group homes for disabled persons.

The County's Zoning Code provisions for housing for persons with disabilities are discussed below:

- **Community Care Facilities** – Community care facilities are licensed by the California Department of Social Services. These facilities provide non-medical, residential care, and supervision to children or adults in need of a supportive living environment. The services provided may include assistance in dressing and bathing, supervision of client activities; monitoring of food intake; or oversight of the client's property. Pursuant to Health and Safety Code Section 1502, as may be amended, community care facilities include the following: residential facility providing 24-hour care; adult day program; therapeutic day services facility; foster family agency; foster family care home; small family home; social rehabilitation facility community treatment facility; full-service adoption agency; and/or noncustodial adoption agency.

  In accordance with state law, small community care facilities that serve six (6) or fewer persons are permitted by-right in all residential districts. Community care facilities that serve 7 to 12 persons are permitted within any residential zone subject to approval of a Use Permit.

- **Congregate Living Health Facility** – Congregate living health facilities are licensed by the State of California pursuant to Section 1250 of the Health and Safety Code, as may be amended, to provide inpatient care; including the following basic services: medical supervision, 24-hour skilled nursing and supportive care, dependent or catastrophically and several disabled. A congregate living health facility serving more than twelve (12) persons may be permitted in any district zoned for either multifamily residential or hotels subject to the

approval of a Use Permit by Planning Commission pursuant to section 7-9-125. During the previous planning period, 2013-2021, the County issued two Use Permits to congregate living facilities in the Unincorporated areas. No permit applications were denied.

- **Group Homes -** Group Homes are defined as facilities that are "being used as a supportive living environment for persons who are considered handicapped under State or Federal law. A group home operated by a single operator or service provider (whether licensed or unlicensed) constitutes a single facility, whether the facility occupies one (1) or more dwelling units. Group homes under the County's Zoning Code do not include the following: (1) community care facilities; (2) any group home that operates as a single housekeeping unit." (section 7-9-95.1). These types of residences for up to six (6) residents are allowed in any district, planned community, or specific plan area zoned for residential uses, including single-family residentially zoned districts, subject to a ministerial Group Home Permit. Given the ministerial nature of the permit, the permit is not a constraint on serving those with special needs. Group homes, as defined by the County's Zoning Code, operate for profit, and provide a supportive living environment for persons who are considered handicapped under state or federal law. Group home regulations do not apply to residential uses that constitute single housekeeping units. In single housekeeping units, the occupants of a dwelling unit have established ties and familiarity with each other, jointly use common areas, interact with each other, share meals, household activities, and expenses and responsibilities; membership in the single housekeeping unit is fairly stable as opposed to transient, members have some control over who becomes a member of the household, and the residential activities of the household are conducted on a nonprofit basis.

  The County has issued two Group Home Permits since 2020, when the ministerial permit program was first initiated. No permit applications have been denied. Group Homes with seven (7) or more residents are allowed in any district, planned community, or specific plan area zoned for multifamily uses subject to issuance of a Use Permit by the Planning Commission per section 7-9-125. No Use Permits for Group Homes with seven (7) or more residents have been denied. Use Permits for Group Homes with seven (7) or more residents are to assure that the use and scope are compatible with the residential neighborhood, as impacts associated with larger Group Homes have resulted in Code Enforcement complaints from neighbors. The Use Permit allows the County to incorporate conditions, including a requirement that the corporate Group Home draft and maintain a good neighbor policy. These conditions are intended to decrease the impact of larger Group Homes on residential neighborhoods.

- **Sober Living Homes** – Sober living homes are a type of group home operated as a cooperative living environment providing an alcohol and drug-free home for persons recovering from alcoholism and/or drug abuse, which are not required to be licensed by the State. The County of Orange made specified findings related to Sober Living Homes when it adopted an ordinance in 2019. At that time, the Board of Supervisors made findings that in addition to the presence of 158 alcohol and drug treatment recovery beds and 21 licensed facilities and/or certified alcohol and drug treatment programs in the Unincorporated areas, there were at least 10 unlicensed sober living homes for which the County had received Code Enforcement Complaints. The Board of Supervisors found that this concentration of licensed and unlicensed treatment beds in the Unincorporated County areas negatively impacted disabled persons by placing them in communities concentrated with treatment centers, thus, not providing persons with disabilities with an opportunity to "live in normal residential surroundings," but rather places persons with disabilities into living environments bearing more in common with the types of institutional/campus/dormitory living that the California Fair Employment and Housing Act (FEHA) and FHAA were designed to provide relief from and which no reasonable person could contend provides a life in a normal residential surrounding. Like other Group Homes, sober living homes for six (6) or fewer residents are allowed in residential districts, subject to a ministerial Group Home Permit. Also, similarly to other Group Homes, sober living homes of seven (7) or more residents shall be permitted in any zoning district zoned for multifamily residential uses subject to the issuance of a Use Permit by the Planning Commission per section 7-9-125 and compliance with certain conditions. No Group Home permit or Use Permit applications have been denied.
- **Reasonable Accommodations –** The County has a robust reasonable accommodations procedure that allows permitting requirements for Group Homes and Sober Living Homes to be waived or modified for eligible disabled persons pursuant to section 7-9-129 – Reasonable Accommodations.

  Although certain types of housing for persons with disabilities require ministerial or Use Permits for larger homes which could serve as barriers to housing for persons with disabilities, the County's robust Reasonable Accommodation procedures, the fact that no permits have been denied, and no facilities have been closed by Code Enforcement action, demonstrates that rather than a barrier, the County has provided safe neighborhood environments for persons with disabilities.

  ~~Given HCDs guidance on County ordinances relating to Group and Sober Living Homes, the County will revise the ordinances to allow all group and sober living~~

~~homes as principally permitted uses in all mixed-use and multi-family zoning districts and to assure that any group home or sober living facility that operates as a single housekeeping unit are permitted in any zoning district. The definition of single housekeeping unit will be revised to eliminate the requirement that the residential activities occur on a nonprofit basis and that the residents share lease agreements or ownership. In addition, the standards for group and sober living homes in single family residential areas shall be objective and not unnecessarily constrain approval of group and sober living homes in that zoning district~~ The County will review and may modify the group and sober living home ordinances in light of the decision in *The Ohio House v. City of Costa Mesa*, *et al.* Ninth Circuit Court of Appeals Case No. 22-56181 (December 4, 2024) and any subsequent relevant cases (see Program 8).

On-/Off-Site Improvements

The on- and off-site improvements required for residential projects are determined by the location and type of the proposed project. For example, construction of a single-family home typically undergoes a ministerial permit process, and any site improvement requirements are determined prior to building permit issuance. These site improvements must be provided by the developer in accordance with the applicable sections of the General Plan, Zoning Code, and/or Specific Plan (if applicable). Typical on-site improvements for single-family homes include:

- Grading improvements in compliance with the County's Grading Code
- Drainage improvements in compliance with the County's Master Plan of Drainage
- Stormwater improvements in compliance with the County's Water Quality Ordinance
- Connections for wet and dry utilities in compliance with the County's adopted building codes
- Planting, irrigation, and landscape-related improvements shall comply with the County's Landscape Irrigation Code
- Off-site improvements (e.g., roads and schools) are generally addressed through the collection of impact fees

A residential development that includes one or more lots is considered a subdivision and requires approval of a discretionary permit. Multifamily housing developments also require discretionary approval unless they are exempt under State law. If a multifamily housing development is proposed as a condominium project, the approval process also requires the submittal of a subdivision map. For these multi-unit projects, the County requires the construction of reasonable on- and off-site improvements pursuant to the Subdivision Map Act. Improvements must also comply with the applicable sections of the General Plan, Zoning Code, and/or Specific Plan (if applicable). At a minimum, on- and off-site improvements required of the developer

typically include those improvements listed above along with the following:

- Grading and improvement of public and private streets and alleys, including surfacing, curbs, gutters, cross gutters, sidewalks, ornamental street lighting, and safety devices
- Sufficient storm drainage and flood control facilities to carry storm runoff, both tributary to and originating within the subdivision
- Sanitary sewage system serving each lot or unit of the subdivision
- Water supply system providing an adequate supply of potable water to each lot and fire hydrants within the subdivision
- Fire hydrants and connections
- Survey monuments
- Public utility distribution facilities, including gas, electric, and telephone necessary to serve each lot in the subdivision

The County may also require the dedication of parcels of land intended for public use, including:

- Streets, highways, alleys, easements, rights-of-way, and land intended for public use
- Vehicular access rights from any parcel to highways or streets
- Private utility easements required by the various utilities
- Easements for natural and improved drainage facilities
- Area dedicated or reserved for parks, recreational facilities, fire stations, libraries, or other public uses as deemed necessary

Dedicated streets, highways, alleys, easements, rights-of-way, etc. must be designed, developed, and improved according to County standards. Roadway classifications are based on the existing and projected traffic need. These roadway classifications are described in the County's Transportation Element and include Commuter (2 lanes), Secondary (4 lanes), Primary (4 lanes, divided), Major (6 lanes, divided), and Principal (8 lanes, divided). Depending on the classification, right-of-way requirements can range from 40 feet to 142 feet with varying curb-to-curb requirements. Private streets as part of developments are considered by the County on a project-by-project basis and must obtain approval of the Orange County Fire Authority (OCFA).

While site improvements may add to the cost of developing residential units, they are required for the health, safety, welfare, and quality of life for residents. Standards for on- and off-site improvements are identified in the General Plan, Zoning Code, and the County of Orange Standard Plans and do not unduly constrain housing development in the Unincorporated areas.

Building Codes

Orange County has adopted the California Building Code (CBC) (2022 Edition), California Residential Code (2022 Edition), California Green Building Standards Code (2022 Edition), 2022 California Energy Code and the 2021 edition of the International Building Code (IBC), which establish construction standards for all residential buildings. These building codes are used as a collective set of rules to guide new construction, adaptive reuse, and renovation. The County's building codes are based on regulations necessary to protect the public health, safety, and welfare. These minimum standards cannot be revised to be less stringent without sacrificing basic safety considerations and amenities.

The County's building codes are updated, as necessary, and reflect conditions unique to Orange County. They contain minimum building requirements for building/fire protection, structural and seismic safety and installation of devices/fixtures that reduce energy consumption. State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic, or topographic conditions and requires that local governments making changes or modifications in building standards must report such changes to the Department of Housing and Community Development and file an expressed finding that the changes are needed.

Together, building and zoning codes help to preserve the housing stock by requiring owners to maintain their properties in sound condition. As part of the County's effort to preserve existing housing, the County has adopted the strategy of taking a "hands-on" educational approach to code enforcement by working closely with owners to explain and apply these codes that address building violations and substandard housing conditions. Neighborhood Preservation staff (also known as Code Enforcement) now leads a multi-agency effort that often entails coordination with Orange County Fire Authority, County Building Inspection, OC Community Resources, Orange County Health Care Agency, Orange County District Attorney, County Counsel, and other agencies to provide owners with guidance in making needed corrections and repairs, in order to maintain their properties in a safe and maintained condition.

Compliance with building codes may increase the cost of housing production and also impact the viability of rehabilitation and preservation of older properties required to be brought up to current code standards. However, these regulations provide minimum standards that ensure the development of safe and accessible housing and do not serve as constraints, but instead as enhancements for residents.

Development Processing Procedures

Residential Permit Processing

Builders and developers frequently cite the cost of holding land during the evaluation and review process as a significant factor in the cost of housing. Undoubtably, the evaluation and review process required by County procedures contribute to the cost of housing. State law has

established maximum time limits for projects approvals and County policies provide from the minimum processing time necessary to comply with legal requirements and review procedures.

Processing times vary depending on the magnitude and complexity of the development proposal. Factors that can affect the length of development review include the completeness of the development application and the responsiveness of development to staff comments and requests for information. Approval times are sustainably lengthened for projects that are not exempt from the California Environmental Quality Act (CEQA), require rezoning or general plan amendments, or encounter community opposition.

Table 3-4 summarizes the types of housing permitted in each zone. Timeframes for housing permits are described below and shown in Table 3-5.

Procedures and Findings and Conditions for Single-Family and Multifamily Residential Projects

Single-family and multifamily developments may involve discretionary permits as shown in Table 3-4. The type of permit could vary depending on the nature of the development and any deviations from development standards proposed by the developer. Single-family and multifamily developments may require discretionary permits including a Use Permit, Site Development Permit, or General Plan and/or Specific Plan Amendment. Again, this is determined based on the developer's requests.

Orange County Codified Ordinances section 7-9-125.3 sets forth the procedures for all discretionary permits, which includes a 30-day window for OC Development Services to determine whether the application submittal is complete. If the application is incomplete, written notification of the deficiencies is provided to the applicant.

Specific procedures and requirements for each type of discretionary permit are set forth in OCCO sections 7-9-126.1 [Site Development Permit], 7-9-126.2 [Use Permit], Variance Permit [7-9-126.4], Area Plan [7-9-128], General Plan Amendment [7-9-131], Zoning Code Amendments and Zone Changes [7-9-132], and Specific Plan Amendment [7-9-133]. The requirements are not onerous and are intended to provide the County with information about the nature of the planned development, for example, detailed development plans and a description of operating uses and characteristics For General Plan Amendments, the application must include "a statement, supported by documentation, which describes how the proposed amendment conforms to the General Plan's goals and the benefit to the public that will result from approving the proposed change or changes to the General Plan." (OCCO Section 7-9-131.3). Specific Plan adoptions and amendments require similar statements and draft amendments or plans. These are common requirements that allow OC Development Services to understand the nature of the requests and potential impacts.

While Site Development Permits do not require a public hearing and are approved by the Director, all other discretionary permits listed above require public hearings and are considered by either the Zoning Administrator or the Planning Commission, with appeals heard by either the Planning Commission or the County Board of Supervisors.

The following findings are required to be made upon approval of any discretionary permit (OCCO Section 7-9-125.6):

(a)(1) General Plan. The use or project proposed is consistent with the General Plan.

(2) Zoning Code. The use, activity or improvement(s) proposed is consistent with the provisions of the Zoning Code.

(3) CEQA. The approval of the permit application is in compliance with the requirements of the California Environmental Quality Act.

(4) Compatibility. The location, size, design and operating characteristics of the proposed use will not create conditions or situations that may be incompatible with other permitted uses in the vicinity.

(5) General welfare. The approval of the permit application will not result in conditions or circumstances contrary to the public health and safety and the general welfare.

(6) Public Facilities. The approval of the permit application complies with Codified Ordinances Section 7-9-711.

(b) For Variance applications. In addition to the findings required by paragraph one (1) of this subsection, the following findings shall be made by the approving authority prior to the approval of any Variance application:

(1) Special circumstances. There are special circumstances applicable to the subject building site which, when applicable zoning regulations are strictly applied, deprive the subject building site of privileges enjoyed by other property in the vicinity and subject to the same zoning regulations. (The special circumstances shall be specified in the adopted finding.)

(2) No special privileges. Approval of the application will not constitute a grant of special privileges which are inconsistent with the limitations placed upon other properties in the vicinity and subject to the same zoning regulations, when the specified conditions are complied with.

(c) Modified development standards. If the land use regulations of a planned community or specific plan allow a discretionary permit, other than a Variance Permit, to modify the site development standards to be less restrictive than otherwise stated in the enabling ordinance, the following finding shall be made in

addition to "(1)" above: "The alternative development standard(s) will result in an equivalent or better project in terms of adverse impacts and public benefits to the immediate and surrounding community."

(d) New use allowed. Where the enabling ordinance authorizes a discretionary permit to allow a principal use not specifically identified as permitted or prohibited, the following additional finding shall be made in addition to "(1)" above: "The proposed use is consistent with the purpose and intent of the (name) district/planning area."

These findings ensure the orderly development of residential and other uses within the County Unincorporated Areas.

Discretionary permits for single-family and multifamily developments may also include conditions of approval that ensure compliance with State and Federal laws. For example, conditions vary based on the development proposed and its location, but conditions may include requirements such as: (1) completion of a Water Quality Management Plan pursuant to State law prior to the issuance of building and grading permits; (2) detailed landscape plans to assure compliance with requirements for native and drought resistant plants; (3) submission of fire master plans to assure the safety of residents and compliance with State and local fire regulations pertaining to development; (4) demonstrated compliance with the County's National Pollutant Discharge Elimination System (NPDES) Implementation Program to ensure compliance with federal law; (5) submission of a Stormwater Pollution Prevention Plan; (6) submission of an Erosion and Sediment Control Plan; (7) submission of drainage and/or geology studies; (8) indemnification of the County.

The County limits conditions imposed on discretionary permits as much as possible with an eye toward only imposing conditions necessary to comply with state and/or federal law or conditions to assure safety and compatibility of the project proposed. The discretionary permit findings and conditions do not impose an improper burden on applicants, but instead assure a streamlined process for compliance with all applicable laws and regulations.

In July 2024, the County removed the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable units (see Program 2). These uses will be allowed as a by-right use. For multifamily development with 5 or more units, the Site Development Permit requirements will be amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards for certain projects. The County adopted Objective Design Standards (ODS) to provide local guidance on design and standards for housing development, including by-right projects, as allowed by State law and the Housing Accountability Act which prohibits a local agency from disapproving or reducing the density of housing development projects that comply with local and state regulations unless the agency can make certain written findings.

The County also created an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law (see Program 3).

Table 3-4
Housing Types Permitted in Residential Zoning Districts

Uses	AR	E1	RHE	E4	RE	R1	RS	R2	R3	R4
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P	P
Alcoholism or Drug Abuse Recovery/Treatment Facilities Large	-	-	-	-	-	-	-	UP 1,2	UP 1,2	UP 1,2
Alcoholism or Drug Abuse Recovery/Treatment Facilities Small	P	P	P	P	P	P	P	P2	P2	P2
Community Care Facilities- Large (7-12 people)	UP	UP	UP	UP	UP	UP	UP	UP1	UP1	UP1
Community Care Facilities- Small (1-6 people)	P	P	P	P	P	P	P	P	P	P
Congregate Living Health Facility Large (7-12 people)	UP	UP	UP	UP	UP	UP	UP	UP1	UP1	UP1
Congregate Living Health Facility Small (1-6 people)	P	P	P	P	P	P	P	P	P	P
Duplex	-	-	-	-	-	-	-	P	P	P
Farmer Dwelling Unit	P6	P6	-	-	-	-	-	-	-	-
Farmer Housing Complex	P6	P6	-	-	-	-	-	-	-	-
Group Home Large	-	-	-	-	-	-	-	UP 1,2,3	UP 1,2,3	UP 1,2,3
Group Home Small	P	P	P	P	P	P	P	P 2,3	P 2,3	P 2,3
In-home Child Care Large	P	P	P	P	P	P	P	P	P	P
In-home Child Care Small	P	P	P	P	P	P	P	P	P	P
Mobile home Developments	-	-	-	-	-	-	-	UP	UP	UP
Multifamily Dwelling										
2-4 Units	-	-	-	-	-	-	-	P	P	P
5 or More Units	-	-	-	-	-	-	-	SDP	SDP	SDP
Condo	-	-	-	-	-	-	-	UP5	UP5	UP5
Other Housing										
Planned Development	UP	UP	UP	UP	UP	UP	UP	UP	UP	UP

Table 3-4
Housing Types Permitted in Residential Zoning Districts

Uses	AR	E1	RHE	E4	RE	R1	RS	R2	R3	R4
Senior Citizen Housing Development	-	-	-	-	-	-	-	SDP/ UP5	SDP/ UP5	SDP/ UP5
Single-Family OR Mobile home	P	P	P	P	P	P	P	P	P	P
Sober Living Home Large	-	-	-	-	-	-	-	UP	UP	UP
Sober Living Home Small	P	P	P	P	P	P	P	P/UP	P/UP	P/UP
Supportive Housing	P	P	P	P	P	P	P	P	P	P
Transitional Housing	P	P	P	P	P	P	P	P	P	P

P Permitted By-Right
SDP Site Development Permit
UP Use Permit
- Not Permitted

A1 “General Agricultural” District
AR “Agricultural Residential” District
E1 “Estates” District
RHE “Residential Hillside Estates” District
E4 “Small Estates” District
H “Housing Opportunities” Overlay District5
MX “Mixed-Use” Overlay District5
RE “Residential Estates” District
R1 “Single-Family Residence” District
RS “Residential, Single-Family District”
R2 “Multifamily Dwelling” District
R3 “Apartment” District
R4 “Suburban Multifamily Residential” District

Notes:
1. Facilities serving seven (7) or more persons, and senior living facilities, shall be subject to the approval of a Use Permit to the Planning Commission.
2. There shall be one thousand (1,000) feet of separation (as measured from property lines) between any two (2) Alcoholism or Drug Abuse Recovery/Treatment facilities of seven (7) or over that require a UP, or between any two (2) Sober Living Homes, or between any Alcoholism or Drug Abuse Recovery/Treatment facility and Sober Living Home, as defined.
3. Group Homes, including Sober Living Homes, shall obtain a ministerial "Group Home Permit."
4. Multifamily projects of no more than two (2) units as a residential condominium, stock cooperative, and community apartment projects are permitted subject to a Use Permit.
5. Multifamily projects of four (4) or fewer dwelling units are permitted. Multifamily projects of five (5) or more dwelling units are permitted subject to a Site Development Permit. Residential condominium, stock cooperative, and community apartment projects are permitted subject to a Use Permit.
6. Farmworker housing shall be allowed only on land with an ongoing agricultural use.

Source: County of Orange Zoning Code, 2020

Table 3-5 identifies the typical processing time most common in the permitting process for ministerial and discretionary permits. It should be noted that each project does not necessarily have to complete each step in the process (i.e., multiple-family projects less than 5 units may be permitted by-right dependent on the residential zone). Also, certain review and approval procedures may run concurrently. For example, the County allows concurrent processing of permit application for building permits requiring discretionary permit review.

Table 3-5
Typical Project Processing Times Frames by Housing Project Type

	Housing Type Project		
	Single-Family and Second Unit (ADU/JADU)	**Single Family Subdivision**	**Multifamily**
Typical Processing Procedures	▪ Zoning Plan Check ▪ Building Plan Check	▪ Tentative Map ▪ Review Final Map ▪ Zoning and Building Plan Check	▪ Site Development Permit ▪ Use Permit ▪ Zoning and Building Plan Check ▪ Environmental Review
Reviewing Body	▪ Ministerial Review by County Staff	▪ Planning Commission ▪ Board of Supervisors	▪ Could vary by development, but could include Discretionary Review by Director, Planning Commission, or Board of Supervisors
Estimated Total Processing Time	3 to 6 Months	6 to 9 Months	12 to 24 months
Estimated Total Time Between Project Approval and Application for Building Permits	NA	6 to 9 Months	Up to 24 months

Source: OC Development Services, 2023

Permit Processing Timeframes – Discretionary Permits

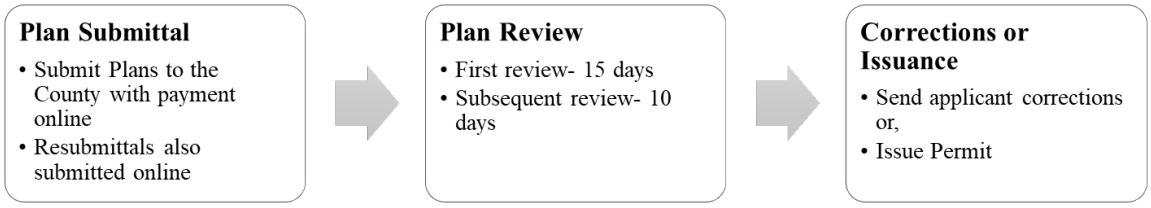
Single-family and multifamily residential projects requiring discretionary actions, such as Use Permits and/or zone changes, necessitate a higher level of review, resulting in a longer processing timeline. Orange County's development approval process is designed to accommodate, not hinder, appropriate development. Approval of discretionary permits for residential uses can typically be processed within 120 days after submission to the County. Recently, the following residential developments were granted entitlements (approval of discretionary permits) in the timeframes indicated (not including building permit processing):

- Casa Paloma (affordable housing): 2 months
- Potter's Lane (affordable housing): 4 months
- The Retreat (luxury senior housing): 9.5 months
- Madison Court (detached condominiums): 16 months

Permit Processing Timeframes - Compliance with Permit Streamlining Act Ministerial Building Permits

Projects that do not require a Site Development Permit or a Use Permit, are permitted by-right and can obtain building permits directly. The process to obtain residential building permits is outlined in **Figure 3-1**, Residential Building Permit Process.

Figure 3-1 Residential Building Permit Process



Single-family home. Construction of a single-family home on a legal building site does not require discretionary approval but requires only grading and/or building permit issuance. The County's permitting process policy identifies a timeframe of 15 business days for first plan check and 10 business days for second plan check and includes concurrent planning and zoning review for compliance with local and State building codes prior to permit issuance.

Single-family residential subdivision. In the Unincorporated areas, residential subdivisions may contain as many as 150 units, or more. The number of units in the subdivision will greatly affect the number of days from submittal of application(s) to issuance of permits. The information below is based upon the average number of days from application submittal to permit issuance for all residential subdivisions regardless of number of units.

Based on data from building permits issued in the years 2020-2021 for new single-family residential subdivisions, it takes an average of 250 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 4-5 plan check reviews, an average of 48 total business days in plan check with the County, and the remainder of the time frame with the applicant. New single-family developments within a planned community have also taken an average of 250 days from submittal of building permit application (plan check initiation) to permit issuance but had an average of 2-3 plan check reviews and an average of 19 total business days in plan check with the County. The target turnaround time for developments located within a planned community is 7 business days for the first plan check, 5 business days for the second plan check, and 3 business days for all subsequent rechecks.

Larger subdivision projects are typically more complex and may be referred to the Planning Commission and/or the Board of Supervisors for approval.

Multifamily residential development. Much like residential subdivisions, multifamily projects may contain as many as 100 units, or more. The number of units in the multifamily project will

greatly affect the number of days from submittal of application(s) to issuance of permits. The information below is based upon the average number of days from application submittal to permit issuance for all multifamily projects regardless of number of units.

In the case of multifamily development, the process begins with the submittal of a discretionary Site Development Permit which is subject to administrative approval and typically does not require a public hearing. However, large developments are typically more complex and may be referred to the Planning Commission and /or Board of Supervisors for approval.

Based on data from permits issued between 2016-2021 for new multifamily developments, it takes an average of 280 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 4-5 plan check reviews, an average of 50 total business days in plan check with the County, and the remainder of the time frame with the applicant. The target turnaround time for multifamily developments is 15 business days for first plan check and 10 business days for subsequent rechecks and includes concurrent planning and zoning review for compliance with local and State building codes prior to permit issuance.

Between 2020-2021, new multifamily developments located within a planned community had an average of 290 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 5-6 plan check reviews and an average of 29 total business days in plan check with the County. The target turnaround time for developments located within a planned community is 7 business days for the first plan check, 5 business days for the second plan check, and 3 business days for all subsequent rechecks.

Length of Time between Application Approval and Building Permit Issuance

The length of time between receiving approval for a housing development and submittal of an application for building permits is influenced by several factors, none of which are directly impacted by the County. Factors that may impact the timing of building permit issuance include completion of construction drawings and detailed site and landscape design; securing construction and permanent financing; real estate transaction schedules, and retention of a building contractor and subcontractors. The County uses in-house and contracted staff for building plans check which allows for working closely with applicants through the review process and close monitoring of projects, which results in expedited review of projects. Table 3-5 includes estimated total time between project approval and application for building permits. For multi-family projects, applications can take up to 24 months from the time an application is filed and building permits applications are submitted. For single family projects, the typical timeframe is 6 to 9 months.

Compliance with Permit Streamlining Act

From the date an application is submitted, the County internally tracks the amount of time that the application materials have been pending, which reviews are completed, and whether there is

additional information needed from the applicant. The County's computer system tracks permit streamlining deadlines. The time the County takes between finding an application complete and issuance of relevant permits complies with the Permit Streamlining Act. Specifically, the County conducts pre-application screenings with applicants to ensure that, once submitted, the County can quickly inform the applicant whether the application is complete within 30-days of its submission. (Gov. Code, section 65943.) The County also maintains detailed lists of information required for each type of permitting application in order to inform potential applicants of what is required for a complete permitting application. (Gov. Code section 65940.) If additional information is required, County staff notifies the applicant within 30 days of the submission of the additional information required through the plan check process. The County timely reviews each new or additional submission within 30 days of when it is received. (Gov. Code section 65943.) For discretionary projects that trigger the Permit Streamlining Act, the discretionary approval is generally issued simultaneously with the approval of the appropriate environmental documentation, consistent with the requirements of state law. (See Gov. Code sections 65950-65957.)

Programs to Address Development Processing Procedures Constraint

In addition, to address this issue, minimize the impact of the County's review process on the cost of housing, and to facilitate the timely and efficient processing of residential development, the County has enhanced both its in-person and web-based services and has created a permitting process that is 100% paperless.

The County established the County Services Center (CSC) which is a "One Stop Shop" resource for developers, property owners and builders. In the CSC, customers can obtain assistance, information, and step-by-step guides regarding the development process and regulations. This facility also serves as a centrally coordinated location to submit permit applications, plans, and fees. The CSC also offers Express Permits which are simple permits that can be approved within 1-2 business days.

The County has been proactive in implementing strategies to remove development constraints and facilitate development of housing:

- In July 2024, the County removed the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable For multifamily development with 5 or more units, the Site Development Permit requirements were amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards as allowed by State law and the Housing Accountability Act (see Program 2).
- The County also created an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed

including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law (see Program 3).The process went into effect in July 2024.

Additionally, OC Public Works has enhanced its electronic resources to deliver processing services and provide information to residential developers more effectively. The OC Development Services website provides continuous access to filing instructions and applications as well as information regarding permit fees and deposits. The County currently offers an online permitting portal – myOCeServices (https:myoceservcies.ocgov.com) for all permit types, including building permits, planning applications, encroachment permits, subdivision applications, and improvement plans. Plans are submitted electronically, and applicants have the ability to check the status of their applications/permits as they are being reviewed. Applicants can request inspections and view results online as well as obtain final inspection results and Certificates of Occupancy. Issuance of building permits is completed electronically, and the approved plans are immediately available for the applicant via the myOCeServices portal.

To further facilitate an efficient and timely review process, the County allows concurrent processing of permit applications. Applicants may concurrently submit an application for building permits as their proposed project undergoes discretionary permit review and approval. Applicants must complete a form and submit an affidavit that are both readily available on the County's website. This is regular practice for housing development projects.

Environmental Review

Environmental review is required for all development projects under the California Environmental Quality Act (CEQA), and for projects that receive federal funds under the National Environmental Policy Act (NEPA). An Environmental Impact Report (EIR) is required by CEQA of all developments that have the potential of creating significant impacts that cannot be mitigated. All of the planned communities which make up the southern and eastern portions of Unincorporated Orange County required the preparation of EIRs. The only significant areas left to develop are future phases of the "Ranch Plan Planned Community" on Rancho Mission Viejo properties. Most infill residential projects in the Unincorporated County are either Categorically Exempt or require only an Initial Study and Negative Declaration (or Mitigated Negative Declaration). The Negative Declaration process typically takes 3-4 months to prepare, plus the mandated public review period.

The environmental review process can provide useful information for the County about impacts on local environments and needed mitigation measures, as well as useful construction and market information for builders, buyers, lenders, and others. In contrast, the process may be viewed by some parties as an expensive, complex, and time-consuming burden. However, because

environmental review is required by state law (CEQA) and federal law (NEPA), it does not pose a significant constraint to housing development.

Development Fees and Improvement Requirements

Development fees include the County's cost of processing applications and permits, as well as costs associated with the provision of public facilities required to serve new residents (often referred to as "impact fees").

Application and Permit Processing Fees

The County has adopted a hybrid fee system which includes a variety of fee types. The majority of building permit fees for both residential and commercial uses are calculated using the valuation-based system. Flat fees are charged for safety-related and simple ministerial permits, and actual costs are recovered for discretionary and grading permits. Based on the 2024-2027 fee schedule, there are approximately 24% valuation-based fees, 36% flat fees, and 40% time-material cost-based fees. The County conducts an audit of processing costs periodically to ensure that fees do not exceed actual costs. The latest fee update occurred in July 2024. Initial fee deposits as of July 2024 are shown in **Table 3-6**. These fees are re-evaluated and re-adopted by the Board periodically as needed to adjust to economic conditions.

Many processing fees are a result of state or federal mandates, such as plan check and inspection to ensure public health and safety of grading, flood control facilities, roads, bridges, and construction of buildings. Other costs are associated with state and federal requirements for protection of the environment such as Water Quality Management Plans under the Clean Water Act and National Pollutant Discharge Elimination System (NPDES), or Habitat Conservation Plans under the state's Natural Communities Conservation Program.

The County has adopted several cost-saving measures to reduce permit processing fees, including the following:

- A simplified "by-right" approval process for qualifying multifamily projects in the Housing Opportunities Overlay Zone.
- Pre-filing meetings to assist developers in preparing application packages with no charge for the first three hours of staff time for these meetings.
- Planning and permit fee schedule reviewed on an annual basis.
- Annual review of park in-lieu fees to reflect current market values.
- Waiver of park fees for affordable housing projects.

Table 3-6
FY 2024-27 Planning and Development Fees

Fee Category	Deposit Amount*
Planning and Application Fees	
Tentative Parcel Map	$7,500
Final Parcel Map	$3,000
Tentative Tract Map	$10,000
Final Tract Map	$5,500
Use Permit	$7,000-10,000
Variance	$5,000-10,000
Area Plan	$8,000
Site Development Plan	$7,000-10,000
Zone Change	$10,000
General Plan Amendment	$10,000
Specific Plan Amendment	$10,000
Environmental	
Environmental Impact Review	$10,000 + 10%
Negative Declaration	$7,500 + 10%
Source: County of Orange, July 2024 ** Items with deposits are based on actual processing costs which may exceed initial deposit amount*	

Public Facility (Impact) Fees and Improvement Requirements

After the passage of Proposition 13 in 1978 (Article 13A of the California Constitution) and its limitation on local governments' property tax revenues, cities and counties have faced increasing difficulty in providing public services and facilities to serve their residents. One of the main consequences of Proposition 13 has been the shift in funding of new infrastructure from general tax revenues to development impact fees and improvement requirements on land developers. The County requires developers to provide on-site and off-site improvements necessary to serve their projects, including water, sewer and other utility extensions, street construction, and traffic control device installation that are reasonably related to the project. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities, and school sites, consistent with the Subdivision Map Act. Many of these fees are under the control of other agencies such as school districts, water and wastewater districts, the Transportation Corridor Agencies and Orange County Transportation Authority, and the County has no authority over their amount or collection process. Impact fees that are controlled by the County of Orange are as follows:

- Library.
- Streets and highways.
- Drainage facilities.
- Local parks.

Development fees are passed on to renters and homebuyers in the cost of housing, and thus affect housing affordability. Fees associated with the extension and installation of utilities can be particularly demanding. Most agencies involved in the County's development review process obtain a majority of the revenue for their operations through development fees, and this trend is likely to continue in the future. These fees also help ensure quality development and the provision of adequate public services. For high priority affordable housing projects in the past

the County has used redevelopment housing set-aside funds to help pay application fees and other costs associated with the development review process. **Table 3-7** shows development impact fees applied to new housing developments.

Table 3-7
Development Impact Fees – 2021

Fee Category	Fee Amount (per unit)
Parks	$3,290 – 20,800/unit
Roads	$919 – 24,655/unit
Toll Roads (Transportation Corridor Agencies)	$2,513 – 6,056/unit
Schools	$1.68 – 4.08/sq. ft.
Source: County of Orange, September 2021	

The July 2020 fee update resulted in an increase in the overall cost of planning and permitting services. The fees listed in **Table 3-7** can be found on the County's website.

In order to reduce the effects of fees on lower-income housing, the Board of Supervisors provided assistance to affordable projects in 2009 by adopting an ordinance to waive park fees for qualifying density bonus projects. Although development fees represent a significant component of housing costs, the County does what it can to minimize fees.

In order to estimate the effect of development fees on the total cost of housing, **Table 3-8** shows the fees that were paid by a recent affordable project in the Unincorporated areas. This project is located within the Housing Opportunities Overlay Zone and was completed in 2016. As noted in the table, impact fees represented 1.54% of total project cost, and permit processing fees were just 1% of total cost. This analysis demonstrates that the combined cost of permit processing and impact fees represent about 2.14% of the total cost of a typical project in the Unincorporated areas.

Table 3-8
Representative Multifamily Development Cost Example

Item	Total Project Cost	Cost per Unit[1]	% of Total
Land & off-site improvements	$624,750	$39,047	9.0%
Construction	$4,337,849	$271,116	62.3%
Architecture & survey	$415,954	$25,997	6.0%
Construction interest & legal	$219,631	$13,727	3.2%
Other soft costs (reserves, TCAC, marketing, etc.)	$700,369	$43,773	10.1%
Park fees	$58,163	$3,635	0.8%
School fees	$16,368	$1,023	0.2%
Road fees	Not required	Not Required	Not required
Sanitation District fees	$32,810	$2,051	0.5%
Permit processing	$143,580	$8,974	2.1%
Developer profit	$416,000	$26,000	6.0%
Total Costs	$6,858,284	$435,343	100%
[1]Based on 16 units in Midway City			

Senate Bill 35 (Streamlining Affordable Housing Approval)

California Senate Bill 35 (SB 35), codified as Government Code Section 65913.41, was signed on September 29, 2017, and became effective January 1, 2018. SB 35 will automatically be 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 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.

As of 2018, when a jurisdiction has made insufficient progress toward meeting their above-moderate-income and lower-income RHNA goals, and/or have not submitted the latest Housing Element Annual Progress Report (APR), it is subject to the streamlined ministerial approval process (SB 35 (Chapter 366, Statutes of 2017) streamlining) for proposed developments with at least 50% affordability. All projects, which propose at least 50% affordable units are eligible for ministerial approval under SB 35 as determined by the SB 35 Statewide Determination Summary. To be eligible for SB 35 approval, sites must meet a long list of criteria, including:

- A multifamily housing development (at least two residential units) in an urbanized area.
- Located where 75% of the perimeter of the site is developed.
- Zoned or designated by the general plan for residential or mixed-use residential.
- In a location where the locality's share of regional housing needs has not been satisfied by building permits previously issued.
- One that includes affordable housing in accordance with SB 35 requirements.
- Consistent with the local government's objective zoning and design review standards; and
- Willing to pay construction workers the state-determined "prevailing wage."

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

- 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.

- A site with existing multifamily housing that has been occupied by tenants in the last ten years or is subject to rent control.
- A site with existing affordable housing.

According to State HCD's SB 35 Statewide Determination Summary (based on APR data received as of June 25, 2019), the County of Orange has not made sufficient progress towards its lower-income RHNA and is therefore subject to SB 35. The County is subject to streamlined ministerial approval review for proposed housing developments with at least 50% affordability.

Non-Governmental Constraints

Environmental Constraints

Environmental constraints include physical features such as steep slopes, fault zones, floodplains, sensitive biological habitat, and agricultural lands. In many cases, development of these areas is constrained by state and federal laws (e.g., FEMA floodplain regulations, the Clean Water Act, the Endangered Species Act, and the state Fish and Game Code and Alquist-Priolo Act). OC Public Works and other County agencies have the responsibility to enforce County policies and ordinances regulating development on flood plains, areas of potential seismic hazard, areas of excessive slope, conservation areas, areas with inappropriate conditions for septic tanks, and other environmental issues. Large portions of the remaining Unincorporated County have one or more of these constraints. These problems usually reduce the density allowed and bring into play mitigation measures and other necessary requirements, which add to the total cost of the project. OC Public Works has developed an environmental database with an extensive mapping system that is used in conjunction with the General Plan to facilitate a timely identification of environmental hazards and resources.

The County's land use plans have been designed to protect sensitive areas from development to the extent feasible, and to protect public safety by avoiding development in hazardous areas. Significant areas of sensitive habitat in the central, coastal, and southern portions of the County have been set-aside as permanent open space through adopted Multi-Species Habitat Conservation Plans. While these policies and plans constrain residential development to some extent, they are necessary to support other public policies.

Five major environmental conditions constrain development in Orange County: noise, floods, wildland fires, geologic/seismic hazards, and natural and cultural resources.

- **Noise:** The major sources of significant noise in Orange County are aircraft and highway vehicles. While both can usually be mitigated to acceptable levels indoors, aircraft noise cannot be mitigated outdoors because of its overhead source. State law and County policy prohibit residential development and similar noise sensitive uses in high-noise (+65 decibel Community Noise Equivalent

Level – CNEL) areas near John Wayne Airport. Noise in non-residential developments must be attenuated to protect users in those areas. Near major streets and highways, noise must also be attenuated. Thus, high-noise conditions may preclude certain uses in some areas and may increase development costs.

- **Flood Hazards:** Portions of Orange County are located in floodplain areas of varying degrees of risk, subject to "100-" and "500-year" floods. In many cases, development can occur in these areas through proper site planning, although mitigation costs may be high. There are, however, some areas where development in a floodplain is difficult and expensive to protect a project from extreme flood hazard.
- **Fire Hazards:** Large areas of Unincorporated Orange County are located within a high to very high fire hazard areas as defined by the California Department of Forestry and Fire Protection (CAL FIRE). CAL FIRE map areas of Very High or High Fire Severity Zone (FHSZ) within Local Responsibility Areas (LRAs) and State Responsibility Areas (SRAs). Development within FHSZ requires careful consideration of elements which may increase the risk of wildfires, such as vegetation, topography, and ember movement. Development in these areas is required to comply with the following construction requirements such as, but not limited to:
    - Fire sprinklers in all buildings
    - Ignition resistant construction materials
    - Class A roofing materials and assemblies
    - Defensible space
    - Two-lane street widths

  These requirements would increase development costs and would have an impact on the number of new housing units constructed within the FHSZ.
- In addition to higher construction costs, given that a few insurers have decided to not write new policies in California, homeowners living in fire-prone areas may find it more difficult to obtain affordable fire insurance as the fire season grows longer and wildfires grow in intensity every year in California.
- **Geologic/Seismic Hazards:** Like the entire Southern California region, Orange County is located within an area of high seismic activity. Potential slope and seismic hazards constrain development in certain parts of the County. While both conditions seldom preclude development, they may ultimately increase the cost of construction.

- **Natural and Cultural Resources:** The presence of natural or cultural resources on vacant land may influence its future use. For example, critical habitat areas or archaeological sites may require preservation or sensitive planning. Such conditions may preclude development or increase the cost of construction.

No environmental constraints have been identified on any 6th Cycle Housing Element candidate housing site.

Infrastructure Constraints

Many rapidly growing areas – especially southern portions of the County – have found it difficult to expand infrastructure fast enough to keep up with new development. Development places demands on all public services. It is the County's policy that the infrastructure for water, sewer, drainage, and roads be in place before urban development is permitted. One method for controlling the pace of growth is by limiting capital investment in these facilities. Simply, if the capacity is not available, the development cannot occur. In some cases where capacity is inadequate, private developers may be required to construct the backbone infrastructure or incremental upgrades to existing facilities to serve large developments. Because facilities require huge front-end capital expenditures, some form of municipal financing may be needed.

The network of man-made and publicly owned facilities, such as roads, streets, water, drainage, and sewer facilities form the internal framework, or infrastructure, of communities. The timing and pattern of installing these facilities (capital improvements) will play a part in the implementation of the County's General Plan by impacting the distribution of land uses.

Although capital facilities are built to accommodate present and anticipated needs, some (most notably water and sewer facilities, and roads) play a major role in determining the location, intensity, and timing of future developments.

OC Public Works provides services on a regional basis, to Unincorporated areas, and to other County agencies and departments. Chief among its regional services is providing flood protection countywide. OC Public Works operates and maintains the Orange County Flood Control District, a system of 350 miles of flood control channels, dams and other infrastructure that is continually built and expanded upon.

In lieu of considering individual projects or only those projects to be undertaken in a single year OC Public Works prepares and revises an annual Business Plan. The Business Plan projects annual expenditures for acquisition, construction, rehabilitation, and replacement of public facilities, such as flood control, Unincorporated roadway improvements, streetlights, traffic signals, agricultural commissioner and weights and measures programs, as well as the countywide system of harbors, beaches, and parks. Future growth in Orange County requires the delivery of adequate services to all residents in the Unincorporated County.

While infrastructure imbalances exist in all urban jurisdictions, these imbalances are typically addressed through development phasing, the use of developer agreements and other mechanisms. A brief summary of the principal infrastructure systems serving the County follows:

- **Water:** Approximately 50% of Orange County's water supply is imported into Southern California via the facilities of the Metropolitan Water District (MWD) of Southern California. MWD supplies are delivered by two principal facilities: (1) the Colorado River Aqueduct; and (2) the State Water Project. The rest of Orange County's water supply comes from underground aquifers, several small groundwater basins, and recycled wastewater [17]. The groundwater supply is replenished by direct rainfall and other surface water that infiltrates into the ground, imported water purchased from MWD and recycled water.

  The County of Orange has fourteen water districts and seventeen cities providing potable water to its residents and businesses. All these agencies purchase water through the Municipal Water District of Orange County (MWDOC) except for the cities of Anaheim, Fullerton, and Santa Ana which purchase directly from MWD. The County itself is not a provider of water. Rather Unincorporated areas are served by a variety of public and private providers.

  Water supply has always been a critical issue for Southern California, with local sources of water providing less than half of the area's water needs. In addition to some other resources (such as petroleum or mineral extraction), the County lacks enough water resources to meet its own needs. The direct implication of this deficiency is that the County has become more dependent on imported resources and, as a consequence, is increasingly vulnerable to actions and policies which it cannot directly influence much the same way that local jurisdictions are unable to influence the pricing and availability of imported oil supply allocations.

  To lessen the constraints of insufficient local capacity to meet the County's water demand, the majority of the necessary large-scale improvements within Orange County are projects to improve existing storage reservoirs or build additional storage facilities in south Orange County. The local water conveyance system will be implemented in conjunction with development phasing to meet the delivery demands in Orange County. Since 2008, the Groundwater Replenishment System Project, developed by the Orange County Water District (OCWD) and the Orange County Sanitation District (OCSD), has added 72,000 acre-feet to the groundwater basin every year. With increased water carrying capacity, this and other local and state/regional enhancements should lessen water-related constraints to new construction of housing in the Orange County market.

[17] Source: https://www/mwdoc.com/wp-content/uploads/2017/05/Water-Supply.pdf

- **Sewer:** The collection, treatment, and disposal of wastewater in Orange County are undertaken by special districts and local governments. The County is not a provider of sewer service. The OCSD collects and treats wastewater for the northern and central areas of Orange County. There are seven districts that presently serve numerous cities plus Unincorporated areas within the Districts' boundaries. The Districts' facilities collect the sewage from local cities, sanitary districts, County water districts, and sewer maintenance districts. Wastewater is then transported through the Districts' trunk sewers to the two major treatment facilities located in Fountain Valley. In the South County, sanitation services are provided by the South Orange County Wastewater Authority (SOCWA). SOCWA has ten member agencies and owns or operates four treatment facilities. The authority for sewer services in Unincorporated areas not served by sanitary or water districts rests with the Orange County Board of Supervisors. The funding for sewer services is provided by property taxes, augmentation funds, user fees, or investment income from reserves.

  With these complex, coordinated infrastructure systems, the ability of the various special sewer districts to expand treatment capacities in an incremental fashion, as well as to construct new facilities where needed, has facilitated its rapid growth.

  Most wastewater management agencies have long-range plans to address needed plant expansion/upgrading, based on anticipated population growth within their service areas. As a result of these, and comprehensive water supply studies such as the County Water Plan, the County's wastewater/sewage infrastructure should not serve as a direct constraint to the production of housing to meet the anticipated demand from population growth.

- **Flood Control:** Orange County's flood control effort is divided among three major areas: Tri-County system (San Bernardino, Riverside and Orange Counties), regional system, and local drainage program. With respect to the regional system, the Orange County Flood Control District (OCFCD) is empowered to construct and maintain flood control works to prevent or minimize loss of life and property caused by flooding, and for water conservation. In the County's local drainage program, the storm drains are normally smaller facilities that collect drainage from local streets. In new developments, local drainage facilities are constructed by developers in accordance with master plans of drainage. In many older parts of Orange County, however, local systems were not built due to lack of major systems to accept their discharge. Limited funding from the County's General Fund or the Road Fund is used to implement local storm drains.

- **OC Public Works – Flood Programs** is responsible for implementing the Flood Control District's funded activities program, which includes the design, construction, operation, and maintenance of regional flood control facilities. Flood Control District revenue is obtained mainly from property taxes. The amount of Flood Control District revenue derived from property taxes is based on the average percentage received during the three years prior to the passage of Proposition 13, plus a proportionate share of the subsequent tax base growth. A main charge of the OC Public Works Flood Programs is providing flood protection countywide. The Santa Ana River Project is the largest and most expensive such project. During 1999, for example, construction was completed on the Seven Oaks Dam and channel improvements throughout Orange County. These improvements now provide protection from flooding up to the 100-year magnitude for most of Orange County residents and businesses.

  While not a direct constraint, the continued monitoring and implementation of the 1987 Clean Water Act will help guide new development, steering it away from areas that may be susceptible to flood damage. The County's available flood control infrastructure, along with continued flood plain management and successive implementation of the Flood Control District's master plan, should minimize any undue constraints to the production of affordable and/or market rate housing in the County.

Land Costs

Land represents one of the most significant components of the cost of new housing. Land values fluctuate with market conditions and the recent downturn in the housing market has affected land values negatively. Changes in land prices reflect the cyclical nature of the residential real estate market, and home prices and land values have experienced an increase in 2020 compared to previous years.

Land costs can also pose a significant constraint to the development of affordable and moderate-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., soil stability, seismic hazards, flooding) can also be factored into the cost of land. A July 2021 Zillow search for lots returned a number of properties ranging from $20 million for 35.96 acres east of Brea, $10,500,000 for 6,534 square feet in Emerald Bay, to $75,999 for 0.81 acres in Silverado Canyon. The average cost of land in Unincorporated Orange County is $20.89 per square feet. The holding cost of land during construction also adds to the price of housing. Holding costs vary depending on interest rates for acquisition and development loans. Interest rates are beyond the control of local jurisdictions. Reducing processing times for building permits in most jurisdictions can lessen land holding costs. However, the County's processing times are already among the most

efficient in Orange County, and to reduce them further may compromise the County's ability to protect public health and safety.

Other factors affecting the costs of land include overall availability of developable lots within a given sub-region; environmental site conditions and constraints; public service and infrastructure availability; aesthetic considerations such as views, terrain, and vegetation; the proximity to urban areas; parcel size; and existing housing inventory. As a result of the proliferation of short-term rentals in the community, the County adopted short-term rental regulations to track and monitor these units as part of its Comprehensive Zoning Code Update adopted in July 2020. Since its inception through June 30, 2023, 76 short-term rental permits have been approved; subsequently, the short-term rental regulations have a minimal impact on the cost and supply of housing.

Most importantly, land availability and permitted development density determine land prices. As land becomes scarcer, the price of land increases. And in related fashion, land prices have a positive correlation with the number of units permitted on each lot – that is, the more units permitted under General Plan land use guidelines, the higher the value of that land. In addition, more remote areas generally have less expensive (and larger tracts) of land, while smaller, more expensive parcels are typically located closer to urbanized areas. The County cannot control land prices, as they are set in the marketplace and are governed by such factors as speculation, demand, supply, and location.

Construction Costs

Construction costs vary widely according to the type of development, with multifamily housing generally less expensive to construct than single-family homes on a square-foot and per unit basis. However, there is variation within each construction type, depending on unit size and the quantity and quality of amenities provided. One indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The ICC was established in 1994 with the goal of developing a single set of national model construction codes, known as the International Codes or I-Codes. The ICC updates the estimated cost of construction at six-month intervals and provides estimates for the average cost of labor and materials for typical Type VA protected wood frame housing, which is commonly used in the construction of newer apartment buildings with no exposed wood visible. Estimates are based on “good-quality” construction, providing for materials and fixtures well above the minimum required by state and local building codes.

In August 2020, the ICC estimated the average per square foot cost for good-quality housing was approximately $118.57 for multifamily housing, $131.24 for single-family homes, and $148.44 for residential care/assisted living facilities. Construction costs for custom homes and units with extra amenities are higher. Construction costs are dependent upon materials used and building height, as well as regulations set by the County’s adopted Zoning Code, Building Code, and Fire Code. For example, according to the ICC, constructing an accessory dwelling unit (ADU) or

converting a garage space for residential use using a Type VB unprotected wood framed housing, which often has exposed wood so there is no fire resistance, would cost about $123.68 per square foot. Although construction costs are a significant portion of the overall development cost, they are consistent throughout the region and, when considering land costs, are not considered a major constraint to housing production in Orange County.

A reduction in the construction costs can be brought about in several ways. One such method is a reduction in amenities and quality of building materials in new homes (still above the minimum acceptability for health, safety, and adequate performance), which may result in lower sales prices. State Housing Law provides that local building departments can authorize the use of materials and construction methods if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the applicable building codes.

Cost and Availability of Financing

The availability of financing affects a person's ability to purchase or improve a home. 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. 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. Lending activity is reviewed to determine if home financing is made available to all residents of a community. Data related to the disposition of loan applications submitted per the 2019 HMDA report from the Consumer Finance Protection Bureau for home purchase, home improvement, and refinancing in the Anaheim-Santa Ana-Irvine Metropolitan Statistical Area (MSA)/Metropolitan Division (MD) is contained below in **Table 3-9**.

Table 3-9
Disposition of Loan Applications by Race/Ethnicity
Anaheim-Santa Ana-Irvine MSA/MD

Applications by Race/Ethnicity	% Approved	% Denied	% Other	Total (Count)
LESS THAN 50% OF MSA/MD MEDIAN				
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
50-79% OF MSA/MD MEDIAN				
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

Table 3-9
Disposition of Loan Applications by Race/Ethnicity
Anaheim-Santa Ana-Irvine MSA/MD

Applications by Race/Ethnicity	% Approved	% Denied	% Other	Total (Count)
Hispanic or Latino	47.6%	27.7%	29.3%	3,245
80-99% OF MSA/MD MEDIAN				
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
100-119% OF MSA/MD MEDIAN				
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
120% OR MORE OF MSA/MD MEDIAN				
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.

Lending practices are another economic factor that may influence access to housing opportunities. **Table 3-9** displays the disposition of loan applications for the Anaheim-Santa Ana-Irvine MSA/MD, per the 2019 Home Mortgage Disclosure Act (HMDA) report. Key findings, as shown in the table, include:

- Very low-income applicants (less than 50% of the MSA/MD median income) are more likely to have a loan application denied. The highest rates of denial were amongst those who identify as American Indian/Alaska Native (52.3%) and Native Hawaiian or Other Pacific Islander (44.2%).
- Above moderate-income applicants (at least 120% of the MSA/MD median income) experienced the highest rates of loan approvals. Within this income category, those who identify as White had the lowest percentage of denied applications (11.3%), while those who identify as Black or African American had the highest percentage of denials (17.3%).

- Across all income categories, applicants who identified as White had the highest rates of loan approvals.
- Overall, applicants who identified as White made the majority of all loan applications, followed by applicants who identified as Asian, then Hispanic, or Latino.

According to the data, above-moderate-income applicants (earning 120% or more of the MSA/MD median income) had the highest rates of loans approved. Of that income category, applicants who reported white had the highest percentage of approval and the number of applications. Very low-income applicants in the less than 50% of the MSA/MD median income categories 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.

4. AFFIRMATIVELY FURTHERING FAIR HOUSING

California Assembly Bill 686 (AB 686) established new requirements for all California jurisdictions to ensure that local laws, programs, and activities affirmatively further 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 April 23, 2020. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the jurisdiction's fair housing enforcement and outreach capacity.
- An analysis of segregation patterns and disparities in access to opportunities.
- An assessment of contributing factors.
- An identification of fair housing goals and actions.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. 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. State law also prohibits discrimination in the development process or in real property transactions, and it is the County's policy to uphold the law in this regard.

On June 23, 2020, the Board of Supervisors approved the FY 2020-24 County of Orange Analysis of Impediments to Fair Housing (Orange County AI). The purpose of this document is to affirmatively further fair housing opportunities, and is required for communities that administer federal programs, such as Community Development Block Grant (CDBG), Emergency Solution Grant (ESG), and HOME Investment Partnership (HOME) grants.

The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with Orange County jurisdictions and with input from a wide range of stakeholders through a community participation process, prepared the Orange County AI. Stakeholders included tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal and social services providers, housing developers, and industry groups. The Lawyers' Committee met with stakeholders throughout the County, organized community meetings, and help focus group meetings with nonprofit organizations and government officials.

As included in the Orange County AI, the federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA), including FEHA Regulations, protects residents from discrimination on the basis of race, color, religion, national origin, sex/gender, handicap/disability, familial status, marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination.

The Orange County AI is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the FHA. The Orange County AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the Orange County AI lays out meaningful strategies that can be implemented to achieve progress towards the County's obligation to affirmatively further fair housing.

In summary, the Orange County AI recognizes that "[w]thin both Orange County and the broader Region, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, with monthly housing costs exceeding 50% of monthly income, than do non-Hispanic White households. In Orange County, Hispanic households are most likely to experience severe housing cost burden; in the Region, it is Black households." In the Orange County AI context, Orange County includes all areas and cities, not just Unincorporated areas.

As required by federal regulations, the Orange County AI draws from various federal, state, and local sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs.

The Orange County AI discusses two main impediments to fair housing: (1) public sector impediments which include housing discrimination, reasonable modifications and accommodations, and zoning regulations, and (2) private sector impediments, which include advertising, hate crimes, and real estate and lending practices. The analysis also examines publicly supported housing in each city as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The Orange County AI identifies contributing factors to fair housing issues and steps to be taken by each jurisdiction to overcome these barriers.

The Orange County AI is part of the basis of the County's Affirmatively Furthering Fair Housing analysis in this Housing Element. As a part of the Housing Element, the County considers protected class (such as race, ethnicity, income, etc.) and opportunity indicators as key factors in fair housing. Federal, state, and local data provide regional context, background information and supportive data which helps the County to understand fair housing issues and to identify key fair

housing factors for Orange County. The sections below use available data to identify key trends and local contributing factors to fair housing.

Fair Housing Outreach and Enforcement Capacity

The County has committed to complying with the following laws related to fair housing:

- **Title VI of the Federal Civil Rights Act of 1964**: provides that no person shall be excluded from participation, denied program benefits, or subject to discrimination based on race, color, and/or national origin under any program or activity receiving Federal financial assistance.
- **Title VIII of the Civil Rights Act of 1968** (The Federal Fair Housing Act): prohibits discrimination in housing on the basis of race, color, religion, sex, age, and/or national origin. This law also requires actions which affirmatively promote fair housing.
- **Section 109 of Title 1 of the Housing and Community Development Act of 1974**: provides that no person shall be excluded from participation (including employment), denied program benefits, or subject to discrimination on the basis of race, color, national origin, or sex under any program or activity funded in whole or in part under Title I of the Act.
- **Unruh Civil Rights Act:** protects residents from discrimination by all business establishments in California, including housing and accommodations.
- **Ralph Civil Rights Act** (California Civil Code Section 51.7): forbids acts of violence or threats of violence on the basis of race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute.
- **Bane Civil Rights Act (California Civil Code Section 52.1):** protects residents from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing.
- **California Civil Code Section 1940.3:** prohibits landlords from questioning potential residents about their immigration or citizenship status.
- **Government Code Sections 11135, 65008, and 65580-65589.8:** prohibit discrimination in programs funded by the State and in any land use decisions. Recent additions related to housing for special needs groups include Housing for persons with disabilities (SB 520); Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2); Housing for extremely low-income households, including single-room occupancy units

(California Assembly Bill 2634, AB 2634); Housing for persons with developmental disabilities (California Senate Bill 812, SB 812).

Outreach

In terms of outreach related to Fair Housing, the Unincorporated areas are served by the Fair Housing Council of Orange County (FHCOC), a private non-profit fair housing group, which is under contract to the County to administer a wide variety of fair housing services to residents of Unincorporated Orange County. FHCOC provides fair housing outreach services which include:

- Serving as a fair housing resource, including implementation of an affirmative fair housing marketing plan, testing, and complaint verification.
- Responding to citizen complaints regarding violation of fair housing laws.
- Providing tenant-landlord counseling.
- Promoting community awareness of tenant-landlord rights and responsibilities.
- Reporting quarterly to the County on complaint processing.
- Providing fair housing education to residents, County staff, community organizations, agencies, and service providers.
- Increasing awareness of affordable housing in high opportunity areas.
- Inhibiting 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 in protected classes, who are disproportionately likely to be lower-income and likely to experience homelessness.
- Expanding access to opportunities for protected classes.

On behalf of the County of Orange for the Unincorporated areas, the FHCOC investigates housing discrimination complaints, assists complainants with referrals to government enforcement agencies and assists in, or becomes a party to, litigation aimed at halting illegal discriminatory housing practices." Since 1965, the FHCOC has worked to eliminate housing discrimination and guarantee the rights of all people to freely choose the housing for which they qualify in the area they desire.

FHCOC provides programs such as fair housing enforcement and education, landlord/tenant counseling, and mediation and homebuyer HUD counseling for the County of Orange. For fiscal

year (FY) 2020-21, the County of Orange allocated $52,000 in CBDG funds to the FHCOC to perform the following outreach and enforcement for residents of the Unincorporated areas:

- Fair Housing Enforcement including the investigation of housing related discrimination complaints, assisting complainants with referrals to government enforcement agencies, and assisting with and/or becoming a party to, litigation aimed at halting illegal discriminatory housing practices.
- Fair Housing Training to residents, County staff, community organizations, agencies, and service providers.
- HUD Counseling to provide information on a wide range of topics including, but not limited to, rental assistance programs, mortgage default/foreclosure prevention, and the home buying process.
- Landlord/Tenant Counseling that provides counseling regarding housing rights, obligations and laws, and answers questions about the rights and obligations of landlords or tenants.

Fair housing services are offered by FHCOC via phone, email, or in-person at the FHCOC office in Santa Ana, CA. FHCOC provides language services to people whose primary language is not English as well as reasonable accommodation services to person with disabilities to ensure that fair housing assistance is accessible to all.

In addition, FHCOC held 32 training sessions for rental property owners/managers and presented 16 fair housing seminars and 70 general fair housing workshops to members of the public.

During 2021-2022, the FHCOC regionally conducted or participated in 67 virtual and 21 in-person education and/or outreach activities, reaching a culturally and ethnically diverse audience, in which they made participants aware of fair housing laws and counseling services (including services to help households improve their readiness for a home purchase). Because of the COVID-19 pandemic-driven need to engage with participants virtually, 52 of the virtual activities were not specific to residents of the Urban County jurisdiction, but they were all available to those residents.

Regionally, about 2,400 people were contacted or served by these activities during 2021-2022. Through its various regional outreach efforts FHCOC distributed over 19,800 information pieces on fair housing, its services, and other housing-related topics, in either English, Spanish or Vietnamese. A significant number of these items were distributed electronically, with the rest mainly distributed via mail or bulk delivery. Additionally, throughout Orange County FHCOC held 12 virtual training sessions for rental property owners/managers. FHCOC presented 2 virtual fair housing seminars for housing providers in cooperation with the Apartment Association of Orange County (AAOC). Nineteen general fair housing workshops intended for

participation by both/either housing consumers and/or providers throughout Orange County were provided. Due to the virtual nature of these workshops none were specific to residents of the Unincorporated areas, but they were largely available to those residents.

During 2021-2022, FHCOC continued efforts to promote housing affordability within Orange County. It provided services and outreach to organizations involved in the creation and preservation of affordable housing. These groups included the Kennedy Commission, Mental Health Association of Orange County, Radiant Health (formerly Aids Services Foundation), Affordable Housing Clearinghouse, Jamboree Housing Corporation, Mercy House, South County Outreach, Families Forward, Orange County Congregations Community Organizations, and Orange County Community Housing Corporation.

The FHCOC produces and provides written fair housing related materials in English, Spanish and Vietnamese to the persons in Orange County. FHCOC also undertakes specific virtual outreach efforts to immigrant populations in low-income neighborhoods. On a regional basis, an estimated 870 limited English proficiency (LEP) households were served during the 12-month program period in 2021-2022, through a combination of telephonic contact and virtual education and outreach activities. FHCOC also continued to implement activities under HUD Fair Housing Initiatives Program grants, for both education and outreach and fair housing enforcement. These program efforts specifically targeted fair housing services to persons with disabilities, minority groups and immigrant communities, especially immigrants with limited English proficiency. Program efforts included a fair housing testing program that sought to involve members of immigrant populations with limited English proficiency, both for purposes of enforcing fair housing laws as testers and as a vehicle to increase outreach to these populations.

Through its status as a HUD-approved Housing Counseling agency, FHCOC also assists individuals, including those with limited English proficiency (LEP), with various housing related problems. During 2021-2022, this included being available to counsel and assist those who had received loans with documents, all prepared in English, which had terms that were different from what they believed or were informed they were obtaining, or of which they had less than a full understanding. Many of the other counseling activities under its HUD-approved Housing Counseling also assisted individuals with LEP.

Fair Housing Enforcement

During the 2015-2019 reporting period, County-wide, the FHCOC staff received 363 allegations of housing discrimination countywide and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. In the Unincorporated areas, this included the successful resolution of the following complaints:

1. Protected Class Disability - Mental

Requesting Assistance for approval of reasonable accommodation to approve emotional support animal. The request was granted with no other issues pending and the case was closed.

2. Protected Class Race – White

3. Protected Class Race – White

4. Protected Class Race - White

These four complaints were filed with HUD. The complainants received a notice to terminate tenancy. This case was then forwarded to DFEH and mediated with a small monetary settlement for each complainant. All notices to terminate tenancy were rescinded and cases were closed.

During 2021-2022, on a regional basis, FHCOC staff performed 176 intakes regarding fair housing issues, which resulted in receipt of 128 allegations of housing discrimination and the opening of 61 case files, where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. FHCOC also counseled or informed another 67 clients regarding fair housing law and/or rights. Thirty intakes and 25 allegations arose from Orange County, resulting in the opening of 11 cases involving housing in Orange County (not Unincorporated areas specifically). On a regional basis, FHCOC also conducted 116 paired telephonic, systemic tests for discriminatory rental housing practices. An additional 8 paired systemic tests of real estate agents and 6 paired systemic pre-application tests of lenders were conducted telephonically. While all such systemic testing would normally be conducted in person, COVID-19 pandemic restrictions necessitated they be conducted via telephone only. Seventeen systemic rental tests involved locations in the Urban County jurisdiction. Furthermore, 20 paired telephonic or relay supported test were conducted regionally to assess discrimination of possible discrimination against housing seekers who are deaf or hard of hearing. FHCOC also conducted 5 assessments of compliance with accessibility requirements for persons with disabilities at covered multifamily properties built within the last two years.

On a regional basis, during 2021-2022, activities provided by FHCOC included assisting 3,168 unduplicated households addressing 9,875 issues, disputes and/or inquires.

During 2021-2022, on a regional basis, 15 inquiries regarding reasonable accommodations and modifications were received by FHCOC that resulted in casework beyond basic counseling. Overall, 10 of the 15 clients requested and received a reasonable accommodation, with 4 still pending and one where the client did not pursue the matter. Of those that are pending, any that are effectively and improperly denied will likely be referred as an administrative complaint filed with the Fair Housing and Equal Opportunity (FHEO) Office of the U.S. Department of Housing and Urban Development. Another 104 households were counseled on issues involving reasonable accommodation of a disability-related need at their housing.

Orange County rentals listed on Craigslist are also monitored by FHCOC for discriminatory content. Any discriminatory advertisements were flagged as prohibited and FHCOC responded to these ads through Craigslist's reply mechanism to inform the poster of possible discriminatory content. In most instances it was not possible to identify the property address and the identity of the individual making the posting. When possible FHCOC also brought these ads to the attention of Craigslist to hasten their removal, although the Craigslist reporting mechanism is no longer simple. When investigation was found to be feasible, the ad was referred to FHCOC's investigators for possible enforcement action. Other on-line rental advertising sites (e.g., OC Register, LA Times, Westside Rentals, Zillow, etc.) were sporadically monitored; however, the lack of an efficient text search function on these sites made monitoring them less practical. Without exception, among the 'apt / housing' Craigslist rental listings, the identified problematic postings indicated restrictions about children under the age of 18 or improper preference for seniors or 'older adults' for housing opportunities that did not appear to qualify as housing for older persons (age 55 and over). Overt racial or national origin discrimination in postings was not observed.

Advertising in the 'rooms / shared' area of Craigslist was observed to have a higher incidence of stated preferences that violated fair housing law. However, due to the practical aspects of resource limitations and case law considerations of shared housing situations, most were not acted upon. With the change in California law effective January 1, 2020, that expanded 'source of income' protections to individuals who use forms of housing rent assistance, such as the Housing Choice Voucher (often called 'Section 8'), FHCOC had previously identified numerous Craigslist postings that contained discriminatory language regarding the use of housing rental assistance. In the 2021-2022 program year, FHCOC did not find any Craigslist postings for Orange County rentals that discriminated against users of a Housing Choice Voucher, even though this continued to be an issue in other parts of Southern California.

FHCOC's website currently has an on-line housing discrimination complaint-reporting tool that generates an email to FHCOC. It is also used for other, non-discrimination, housing-related issues. The County of Orange has a link to the FHCOC website where residents can access this information.

Analysis of Federal, State, and Local Data and Local Knowledge

As a part of the Housing Element, the County considers protected class (such as race, ethnicity, income, etc.) and opportunity indicators as key factors that influence fair housing. Federal, state, and local data provide regional context, background information and supportive data which helps the County to understand fair housing issues and to identify key fair housing factors for Orange County. The section below uses available data to identify key trends and local contributing factors to fair housing.

The historical context for land use practices provides some background for current land use trends in Orange County. Orange County has a history of disenfranchisement beginning with Spanish colonialism and continuing with discriminatory policies and cultural norms blocking black, indigenous, and people of color communities from property ownership. (B*eyond Equity: Seeking Liberation, Autonomy and Justice in Orange County*, ("OC Equity Report 2021-2022") at p.14.) Spanish colonialism marked the first period of transformation of property rights. The network of missions, oppressive labor structures, conversion to Catholicism, Spanish cultural norms transformed indigenous property ownership and existence. (*Ibid*.) In 1821, when Mexico gained independence from Spain, ownership was transferred to Mexico and large Mexican landholders dominated property ownership in the "postcolonial" period from 1821 to 1850. (*Id.* at p. 15)

In the mid to late 1800s, the land that would become Orange County moved into a post-Mexican territory transition, in which wealthy white US settlers quickly dominated land, policy, and industry. In 1848, after California became a state, "[s]ome landowners of Spanish, Mexican, and indigenous descent who did not have paper records of ownership effectively lost their land at this time. In 1868, vast areas on either side of the Santa Ana River were placed on the market, and the towns of Santa Ana, Tustin, Orange, Westminster, and Garden Grove were soon founded. That same year, James Irvine purchased 1/5th of what would be Orange County. Later, in 1889, Assemblyman E.E. Edwards introduced a bill to create the County of Orange, which was officially formed that same year in August." (*Id.* at p. 15.)

In the twentieth century, Orange County has a history of redlining. "Redlining systematically prevented people of color from accessing services such as mortgages, insurance, loans, rental agreements or owning a home and settling in certain neighborhoods. Although such explicit redlining has waned, financial discrimination based on race/ethnicity still occurs, and the effects are lasting. Discrimination in banking still imposes barriers on [black, indigenous and communities of color] preventing true wealth accumulation." (*Id.* at p. 16.)

In the 1943 ruling in *Doss et al. v. Bernal et al.,* white neighbors lost their fight against Mexican and Spanish homeowners in a Fullerton neighborhood, when the court ruled that the deed held by the Bernals, which stated that "no portion of the said property shall at any time be used, leased, owned, or occupied by any Mexicans or persons other than of the Caucasian race," violated the equal protection clause of the 14th Amendment of the United States Constitution as well as the due-process clause of the Fifth Amendment. (*Id.* at p. 16.) Following this success, there have been periods of both oppression and resistance to affordable housing, which continue to some degree in Orange County.

As stated, in Orange County historical land use practices included the use of restrictive covenants in deeds that limited the ownership, lease/rent, etc. on the basis of race, color, age, religion, sex, gender, familial status, marriage status, disability, national origin, etc. As part of

new legislation, the County of Orange is systematically removing such covenants in deeds. Unlawful restrictions in deeds include those restrictions based on age, race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, familial status, marital status, disability, genetic information, national origin, source of income as defined in subdivision (p) of Section 12955, veteran or military status, or ancestry.

Government Code section 12956.2(a) provides that any deed or other recorded instrument that contains unlawfully discriminatory language forbidding or restricting the right of any person to sell, buy, lease, rent, use, or occupy the property on account of any of the characteristics specified above, may be revised to remove such unlawful language. A person who holds an ownership interest in property that believes the property is the subject of an unlawfully restrictive covenant may submit for recordation a Restrictive Covenant Modification document. If the existence of unlawfully restrictive language is confirmed by County Counsel, the modification document is recorded with the unlawful restrictive covenant redacted. In addition, the Orange County Clerk-Recorder in collaboration with County Counsel will identify such deeds and remove unlawful language and record a redacted covenant. See Housing Action Plan Program 8.

For the period between 1889-1981, the County of Orange identified approximately 48,000 records that contain unlawfully discriminatory language. Of those, to date, 13,000 restrictive covenants have been modified by the Clerk-Recorder. The process remains ongoing. Most of the unlawfully discriminatory covenants restrict the sale, use, lease, etc. of properties to white persons. The unlawful restrictions are contained in deeds for properties all over Orange County; however, a concentration of unlawful deed restrictions was found in Santa Ana/Orange/Anaheim between 1889-1926, as this area was the population center for Orange County in 1889 when the County was incorporated.

Integration & Segregation Patterns & Trends

The integration and segregation pattern discussion focuses on people with the following protected characteristics

- Race and Ethnicity
- Disability
- Familial Status
- Income

Race and Ethnicity

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%, indicating complete integration, to 100%, 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. 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 4-1 shows the dissimilarity between each of the identified race and ethnic groups and in Santa Ana-Anaheim-Irvine, CA Metropolitan Division's population. The higher scores indicate that the two groups tend to live in different tracts. The White population within Orange County makes up most of the County's population with approximately 61% identifying as White alone (non-Hispanic or Latino) according to 2019 American Community Survey (ACS) 5-Year estimates.

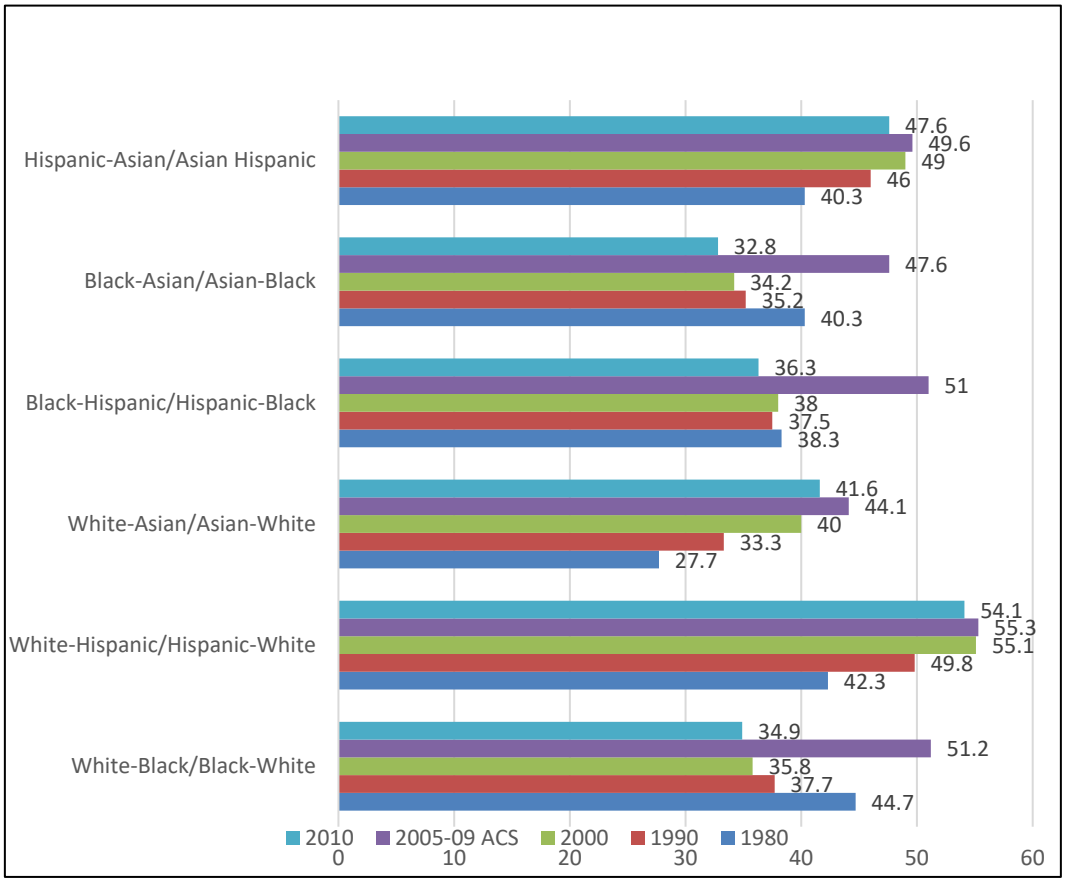
Those who identify as Hispanic, and White were the most likely to live in different tracts. In 1990, White-Hispanic dissimilarity was 42.3 and increased to 54.1 in 2010 both considered a moderate level of segregation. While those who identify as Black and Asian were less likely to live in different tracts. In 1990 White-Asian dissimilarity was 40.3 which was considered a moderate level of segregation while in 2010 the dissimilarity decreased by 7.5 and is considered to be fairly low.

Similarly, to the Santa Ana-Anaheim-Irvine, CA Metropolitan Statistical Area, the San Diego-Carlsbad-San Marcos, CA Metropolitan Statistical Area the population who identified as Hispanic and White were the most likely to live in different tracts. In 1990 White-Hispanic dissimilarity was 41.8 and increased to 49.6 in 2010 both considered a moderate level of segregation. The San Diego-Carlsbad-San Marcos, CA Metropolitan Statistical Area's population who identified as Black and Hispanic were less likely to live in different tracts. In 1990 Black-Hispanic dissimilarity was 49.6 and decreased to 36.7 in 2010 both considered a moderate level of segregation.

The California Department of Housing and Community Development (HCD) considers dissimilarity index scores above 30 as moderate segregation and scores above 60 high segregations. In 2020, as shown by **Figure 4-1**, there were no areas of segregation in the Metropolitan area. While the County has no racial or ethnic populations with a dissimilarity index above 60, all populations aside from those identifying as two or more races have a score

above 30. This means almost all groups experience moderate segregation from the White population. While segregation may be a result of ethnic enclaves or persons of similar cultures living nearby, there is often increased likelihood that segregated areas have fewer access to essential resources. As part of the County's efforts to further fair housing, the County will consider increased targeted outreach to the County's minority residents.

Figure 4-1
Dissimilarity Index with White Population in
Anaheim - Santa Ana- Irvine, CA Metropolitan Division



Source: Brown University, Spatial Structures in the Social Sciences

Table 4-1
Dissimilarity Index Values by Race and Ethnicity for Orange County

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current (2020)
Non-White/White	30.38	34.71	33.58	44.71
Black/White	32.60	33.63	32.27	46.98
Hispanic/White	36.13	41.08	38.18	52.82
Asian or Pacific Islander/White	32.58	34.31	34.82	43.19
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020				

As shown in **Table 4-1** above, overall, Orange County experiences moderate levels of segregation, with significant variances in some individual jurisdictions. The current (2020) Non-White/White value is 44.71, Black/White 46.98, Hispanic/White 52.82, and Asian or Pacific Islander/White 43.19. These values have all increased since 2010, though values had remained consistent from 2000 and 2010. Jurisdictional values tend to indicate low levels of segregation in comparison to Orange County as a whole, but this is due to the spatial distribution of populations across different jurisdictions rather than within different jurisdictions. Areas in central Orange County have the highest Dissimilarity Index values for their populations. Cities of Orange, Santa Ana, and Tustin are particularly affected.

In addition to the Dissimilarity Index, social scientists also use the Isolation and Exposure Indices to measure segregation.

Table 4-2
Isolation Index Values by Race and Ethnicity, Orange County

Isolation Index	Current (2020)
White/White	55.16
Black/Black	3.32
Hispanic/Hispanic	52.81
Asian/Asian	31.84
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020	

These indices, when taken together, capture the neighborhood isolation values for different populations vary widely across the county and individual jurisdictions. Values for White residents are generally higher than for other residents, likely due to the larger number of White residents overall. In Orange County, White residents have an Isolation Index value of 55.16, Black residents 3.32, Hispanic residents 52.81, and Asian residents 31.84. Values for the county are sometimes higher than values in individual jurisdictions for White, Hispanic, and Asian residents, again likely due to higher segregation across jurisdictions rather than within them. Isolation values have generally decreased for White residents over time, increased for Hispanic

and Asian residents, and remained low for Black residents. Hispanic residents have experienced the highest Isolation Index value change over the last few decades. This is partly due to the increasing size of the population in the county.

Contributing factors to segregation include:

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific, neighborhoods, including services and amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Lack of public investment in specific, neighborhoods, including services and amenities[18].

Disability

Persons with disabilities also experience housing access disparities. As shown by **Table 4-5**, nearly 8.5% of Orange County residents have a physical or developmental disability, with a slightly lower percentage, 7.8% in Unincorporated areas. Both of these percentages are lower than the State as a whole. Persons with disabilities may require different features in a home to make housing more accessible, this includes, but is not limited to, ramps rather than stairs, lower and within-reach countertops, and other specific design features. Overall, Orange County, as a whole, has lower percentages of persons with disabilities compared to the State. Persons with ambulatory difficulties (a physical and permanent disability to such a degree that the person is

[18] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

unable to move from place to place without the aid of a wheelchair) and independent living difficulties represented the largest percentages of persons with disabilities in Orange County; this is the same for California as a whole.

Table 4-3
Population by Disability Type

Disability*	Unincorporated Areas	Orange County	California
Hearing Difficulty	2.5%	2.5%	2.9%
Vision Difficulty	1.5%	1.5%	2%
Cognitive Difficulty	2.5%	3.4%	4.3%
Ambulatory Difficulty	3.5%	4.5%	5.8%
Self-Care Difficulty	1.3%	2.2%	2.6%
Independent Living Difficulty	3.0%	4.3%	5.5%
Total with a Disability	**7.8%**	**8.5%**	**10.6%**

**Total of noninstitutionalized population with at least one disability.*
Source: American Community Survey, 5-Year Estimates, 2019

Table 4-4
Persons with At Least One Type of Disability
Unincorporated Areas

Unincorporated CDP or Area	Total Persons	Persons with a Disability	% of Persons with a Disability	No. of Land Inventory Sites (Parcels)
Coto de Caza CDP	15,509	657	4.2%	0
El Modena Area	12,214	1,140	9.3%	181
Ladera Ranch CDP	24,913	1,532	6.1%	0
Las Flores CDP	5,089	235	4.6%	0
Midway City CDP	8,671	1,609	18.6%	35
Modjeska Canyon CDP	834	44	5.3%	0
North Tustin CDP	25,078	2,284	9.1%	2
Orange-Olive Area	14,018	1,115	8.0%	58
Rancho Mission Viejo CDP	7,816	385	4.9%	14
Rossmoor CDP	11,923	980	8.2%	6
Silverado CDP	740	96	13.0%	0
Stanton Area	6,347	719	11.3%	2
Trabuco Canyon CDP	1,223	239	19.5%	0
West Anaheim Area	16,512	1,616	10.0%	27
Williams Canyon CDP	108	17	15.7%	0

Source: American Community Survey 5-Year Estimates 2020
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

The Unincorporated County areas can also be analyzed at the tract-level. For the purposes of this analysis, the Unincorporated County areas have been divided into three sections, North, Central, and South County. North Orange County is generally the area north of California Highway 22, north of the cities of Garden Grove and Santa Ana, and west of Highway 241. Central Orange County encompasses the area south of California Highway 22 and is bound by Highway 241 to the east and extends to include the City of Newport Beach. The data presented for the Unincorporated County subareas is based on tracts in the Unincorporated County. It is relevant to note that some tracts may encompass the Unincorporated County as well as part of an incorporated City, therefore the data is not a perfect representation of the Unincorporated County alone. However, this data serves to present general trends in the Unincorporated County and ACS data itself is only an estimate. **Table 4-5** below shows populations of persons with disabilities in these subareas based on tract-level data.

According to the 2022 ACS (5-year estimates), 8.1% of the Central Orange County population experiences a disability, 9.7% in North Orange County, and 6.9% in South Orange County. In the Unincorporated County as a whole (all three Unincorporated subareas), 8.1% of the population experiences a disability. Over the past ten years, the population of persons with disabilities has increased in all Unincorporated subareas (Central, North, and South) and the Unincorporated area as a whole. According to the 2012 ACS (5-year estimates), only 7.2% of persons in Central Orange County, 8% in North Orange County, and 4.9% in South Orange County experienced a disability. Throughout the Unincorporated County areas, based on tract-level data, only 6.7% of persons experienced a disability in 2012 compared to 8.1% in 2022. Populations of persons with disabilities tend to correlate with elderly populations as elderly persons are more likely to experience disabilities compared to younger age groups. According to the 2022 ACS, 15.4% of the population is 65 or older Countywide compared to only 11.7% in 2012. The

As shown in **Table 4-5** below, ambulatory difficulties are the most common disability type in all three County subareas. In the Central County area, the non-Hispanic White population has the largest disability rate (9.4%) while the Native Hawaiian and other Pacific Islander populations have the highest disability rates in North and South Orange County (14.9% and 19.6%, respectively). Elderly populations are more likely to experience disabilities. Consistent with this trend, 38.8% of persons aged 75 and older in Central Orange County, 46.7% in North Orange County, and 41.2% in South Orange County experience one or more disabilities. As shown in **Figure 4-5**, there tends to be larger elderly populations in coastal areas.

Table 4-5
Persons with Disabilities by Subpopulation and Unincorporated Areas

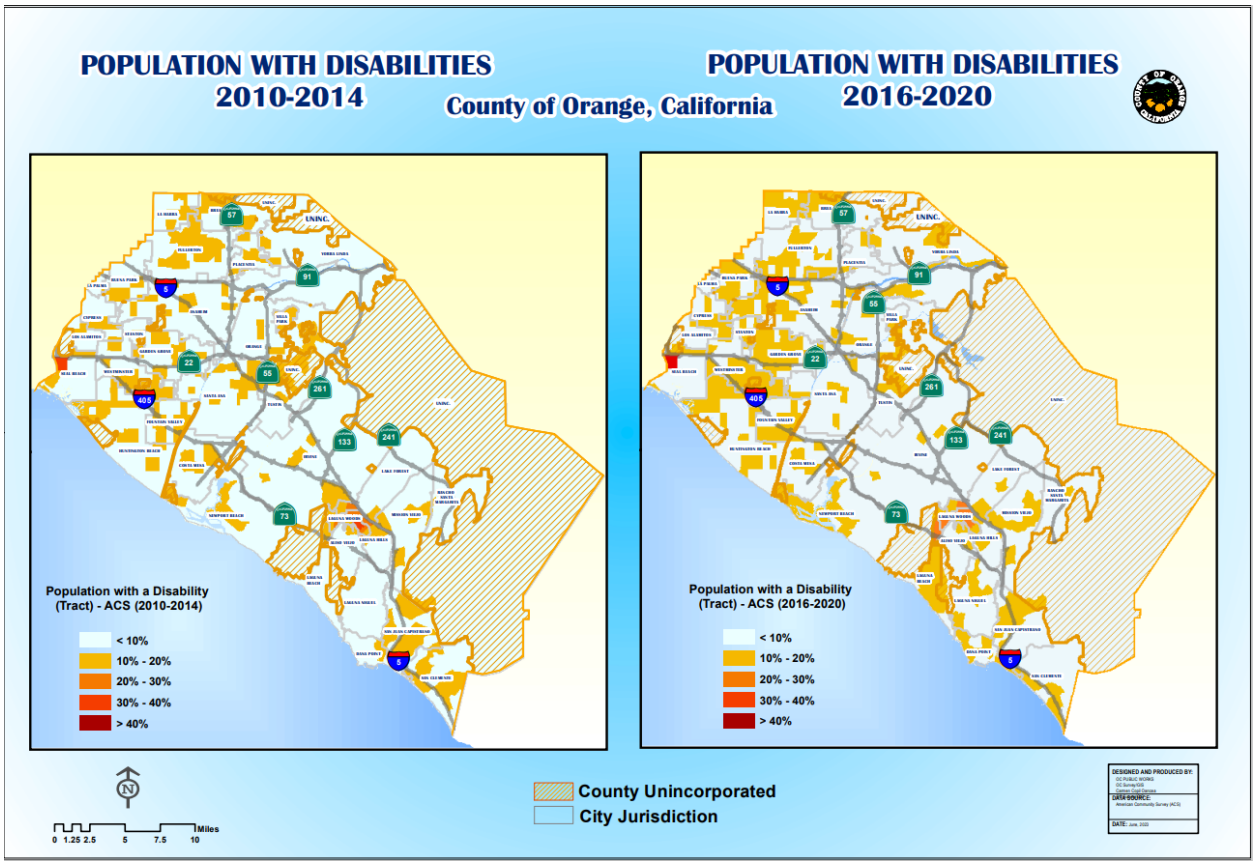
Subpopulation	Central OC	North OC	South OC	Unincorporated Areas
Persons with Disabilities by Type (of total area/subarea population)				
Hearing difficulty	2.2%	2.8%	2.2%	2.4%
Cognitive difficulty	2.8%	3.6%	2.3%	2.9%
Vision difficulty	1.3%	1.6%	1.1%	1.3%
Ambulatory difficulty	3.6%	4.6%	2.9%	3.6%
Self-care difficulty	1.8%	2.4%	1.4%	1.8%
Independent living difficulty	3.0%	3.8%	2.0%	2.9%
Persons with Disabilities by Race/Ethnicity (of total racial/ethnic group)				
Black/African American	6.5%	11.2%	4.8%	7.3%
American Indian and Alaska Native	8.5%	7.3%	6.9%	7.5%
Asian	9.0%	7.8%	4.7%	6.9%
Native Hawaiian and Other Pacific Islander	4.4%	14.9%	19.6%	13.4%
Some other race	5.0%	10.2%	6.4%	7.5%
Two or more races	7.3%	8.9%	5.9%	7.4%
Non-Hispanic White	9.4%	12.6%	7.9%	9.4%
Hispanic/Latino	5.5%	8.2%	6.2%	6.9%
Persons with Disabilities by Age (of total age group)				
<5 years	2.2%	2.0%	0.4%	1.3%
5-17 years	3.7%	4.7%	3.6%	4.0%
18-34 years	5.0%	4.7%	2.9%	4.2%
35-64 years	6.0%	7.3%	5.3%	6.1%
65-74 years	13.1%	19.4%	13.1%	15.1%
75+ years	38.8%	46.7%	41.2%	42.4%
Total population of persons with disabilities	***8.1%***	***9.7%***	***6.9%***	***8.1%***
Total civilian noninstitutionalized population	**208,808**	**242,613**	**294,904**	**746,325**

Source: American Community Survey, 5-Year Estimates, 2022
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

Additionally, **Figure 4-2** below displays the population in all of Orange County with a disability by census tract. The data shows that in 2010 a majority of the census tracts had less than 10% of

the population who reported a disability, with pockets of 10 to 20% in the northwest region of Orange County. Comparatively, the data displaying 2015-2019 data shows that most census tracts had increased populations who reported a disability, approximately 10 to 20%, and in some cases, 20 to 30%. Additionally, the maps show a pocket of census tracts in the Lake Forest area with a higher percentage of persons with disabilities. In 2010-2014 the data shows a mix of 20 to 40% of the population reporting a disability, whereas in 2015-2019 that area decreased in size but increased in the percentage of population reporting a disability.

Figure 4-2
Persons with Disabilities in Orange County, 2010-2014 (Left) and 2015-2019 (Right)



Source: Esri, HERE, Garmin, USGS, NPS|Placeworks 2021, ESRI, U.S. Census|Placeworks 2021, TCAC 2020|Placeworks 2021, CA HCD

Both maps demonstrate that the highest concentrations of populations reporting a disability have consistently remained within incorporated cities over the course of the past 20+ years, with only small pockets of the Unincorporated County area reporting populations with a disability. The pockets of the Unincorporated County area did not migrate or shift between 2010 and 2020. However, those portions of the Unincorporated County area shrunk between 2010 and 2020 and continue to represent only a small fraction of the population in Orange County as a whole reporting a disability.

Consistent with this, the 2016-2020 data presented in **Figure 4-2** shows that the areas with the highest concentration of populations reporting a disability are present outside of the Unincorporated area. Within the Unincorporated County area, the Unincorporated islands of Midway City, El Modena, West Anaheim, Stanton, Orange-Olive, North Tustin, and the Unincorporated areas along the outskirts of the cities of Brea and Yorba Linda appear to have the highest concentration of populations reporting a disability. All of these areas correspond to relatively high opportunity areas and high resource areas, and while they have some overlap with other protected characteristics, the overlap is not concentrated or consistent with any specific protected characteristics. This indicates that there has been little movement over the past decade in terms of where populations reporting a disability reside within the Unincorporated County area, and that populations reporting a disability within the Unincorporated County area have generally high access to resources and good access to opportunities, on par with other populations within the Unincorporated County area.

In Orange County, there are 104 Other Multifamily Housing and 4,090 Project-Based Section 8 units that are subject to Section 504 of the Rehabilitation Act, which requires that federally financed housing developments have 5% of total units be accessible to individuals with mobility disabilities and 2% be accessible to individuals with sensory disabilities. 81 people with disabilities reside in Multifamily Housing, and 549 reside in Project-Based Section 8 units. At this time, it is unknown how many accessible units are in Project Based Section 8 units. There 5,045 people with disabilities that reside in units assisted with Housing Choice Vouchers in Orange County. According to the California Tax Credit Allocation Committee (CTCAC)'s Low Income Housing Tax Credit (LIHTC) database, there are 158 LIHTC developments currently in service. In these 158 developments, there are 16,201 affordable units. These developments were put into service after 1991, meaning that they have all been built according to 1991 Fair Housing Act accessibility requirements.[19]

Based on available data, the supply of affordable, accessible units in Orange County as a whole is insufficient to meet the need. In the County, some 81,297 residents have hearing difficulty, 51,196 residents have vision difficulty, and 133,232 residents have ambulatory difficulty, potentially requiring the use of accessible units. Meanwhile, the data indicates there may be roughly 75,660 units that have been produced subject to the Fair Housing Act's design and construction standards and approximately 4,000 units within developments that must include accessible units subject to Section 504. There is, without question, some overlap between these

[19] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

two categories, some of these units are likely non-compliant, and some accessible units are occupied by individuals who do not have disabilities. [20]

As noted in Section 2, **Table 4-4,** and above, however, the Unincorporated County areas that this Housing Element addresses, do not host a large population of disabled persons. The units available currently likely address the needs of the smaller disabled population in the Unincorporated County areas and thus, this need is lower priority than the need for affordable, elderly, and multifamily housing.

Familial Status

Table 4-6 displays the familial status, or household type, for Unincorporated County areas, Orange County, and the State. Amongst the three jurisdictions, households categorized as "family" made up the largest percent of households overall. Unincorporated County areas and Orange County have a higher percentage of family households than the state. Family households with children represent the same percentage for Orange County as the State and represent larger percentages than non-family households.

Table 4-6
Population by Familial Status

Familial Status	Unincorporated CDPs	Orange County	California
Family Households	83.4%	71.7%	68.7%
Married-Couple Family Households	70.7%	54.9%	49.8%
With Related Children Under 18	35.6%	34.1%	34%
Female Households, No Spouse	9.4%	11.5%	13%
Non-Family Households	16.6%	28.3%	31.3%
Households with One or More People 60 Years+	39.8%	39.9%	39.1%
Total Households	**29,938**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 4-7 below displays income, household type, and number of proposed housing sites for each Unincorporated County area. The Unincorporated County areas with the lowest incomes have the highest percentages of single parent households and the areas with the highest incomes also have the highest percentages of married family households.

[20] *Id.*

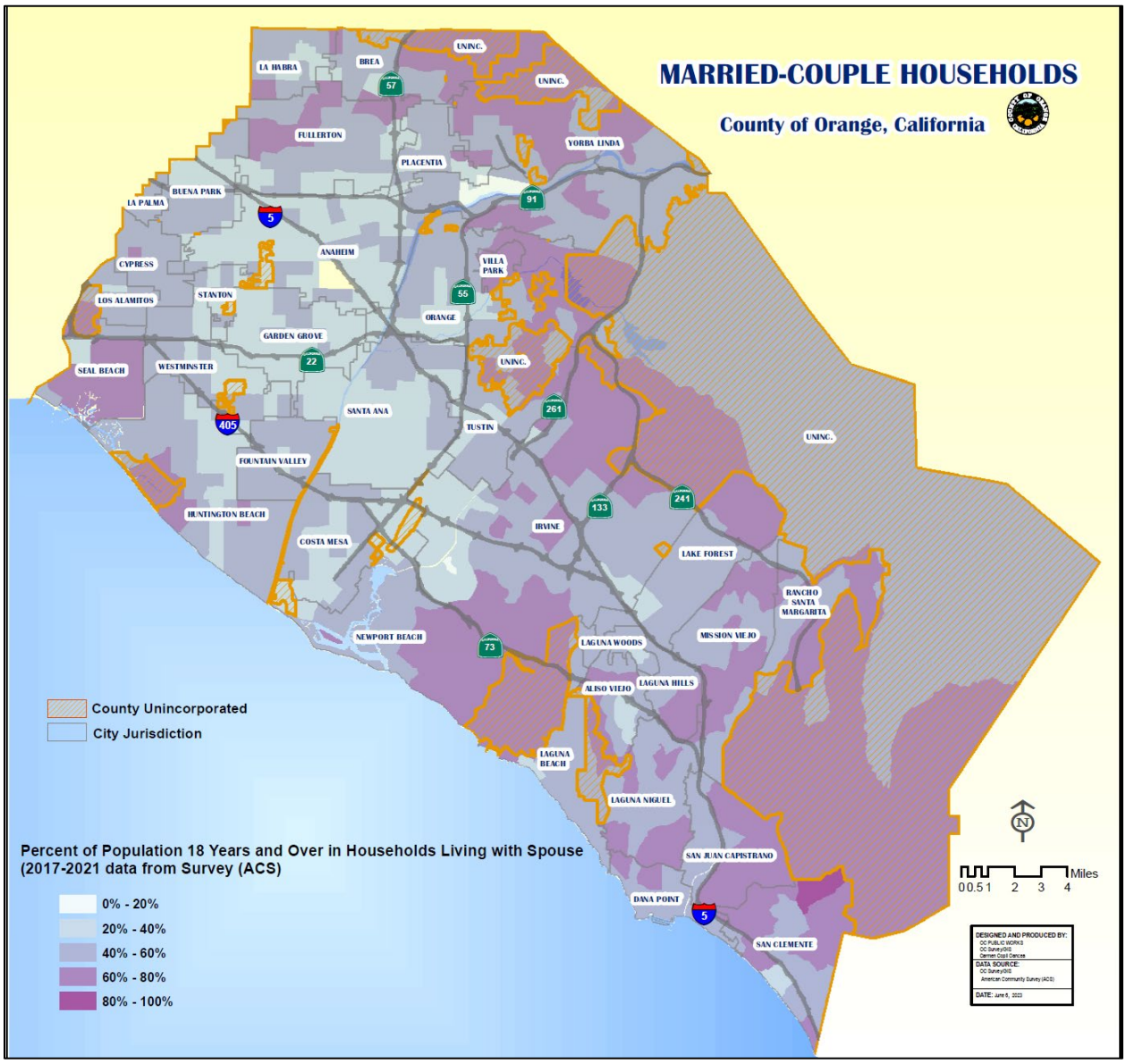
Table 4-7
Population by Familial Status of Unincorporated Areas

Unincorporated CDP or Area	% of Area Median Income (AMI)	Family Status			No. of Land Inventory Sites (Parcels)
		% Married Couple	% Female Head of Household	% Male Head of Household	
Coto de Caza CDP	210	81	7.8	5.5	0
El Modena Area	110	59	21	11.6	181
Ladera Ranch CDP	169	65	21	9.2	0
Las Flores CDP	147	61	18.7	6.3	0
Midway City CDP	48	46	28.6	23.8	35
Modjeska CDP	103	78	13.6	3.8	0
North Tustin CDP	157	70	17	7.9	2
Orange-Olive Area	129	61	10	6	58
Rancho Mission Viejo CDP	152	66	28	4.1	14
Rossmoor CDP	153	67	19.3	10.1	6
Silverado CDP	90	34	30	26	0
Stanton Area	70	31	31	12.6	2
Trabuco Canyon CDP	164	70	10	10.3	0
West Anaheim Area	72	47	28.5	14.3	27
Williams Canyon CDP	N/A	100	0	0	0

Source: American Community Survey, 5-Year Estimates, 2021.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

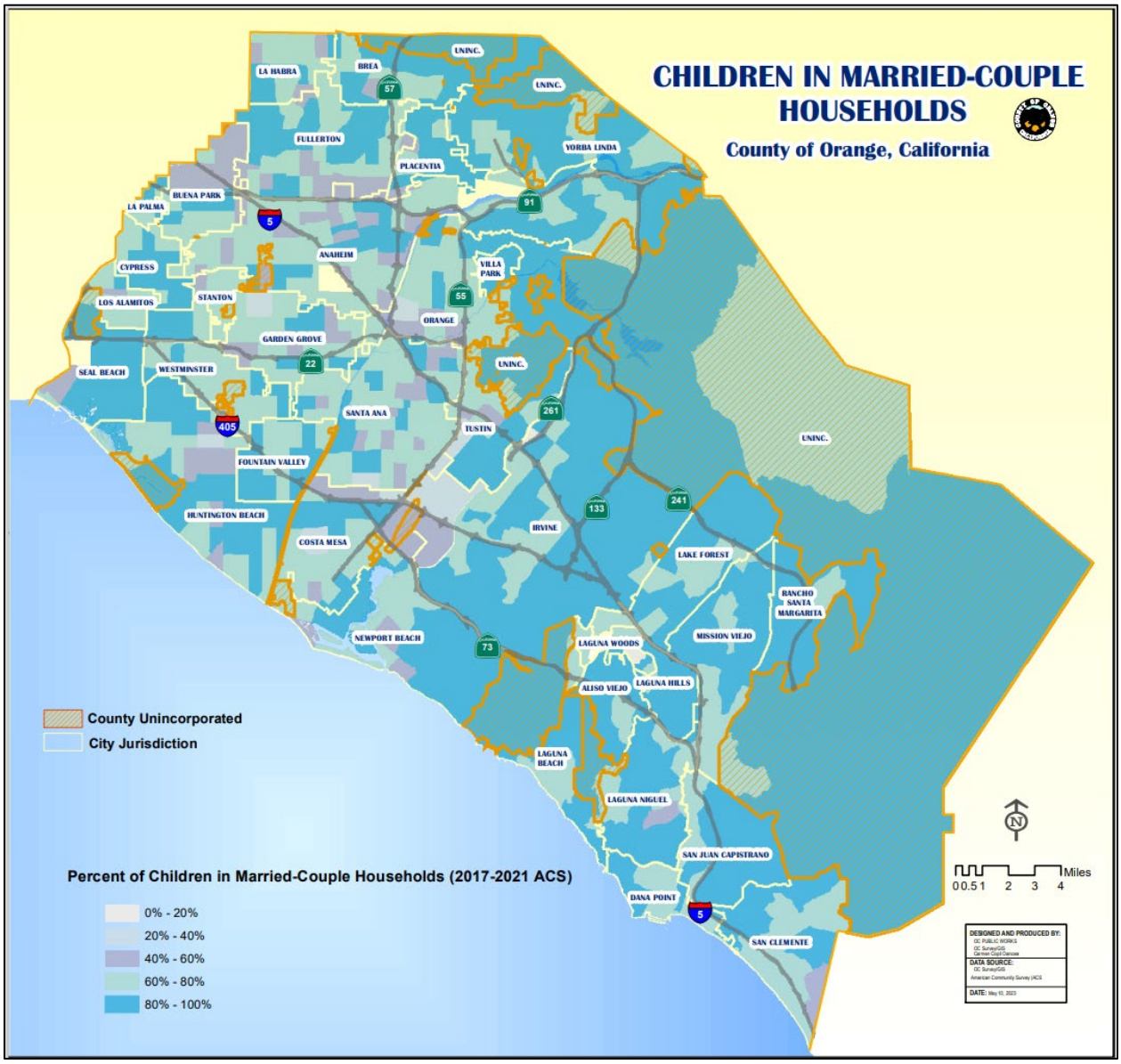
Figures 4-3 through **4-5** below show household type and familial status geographically across Orange County, including the Unincorporated County areas. As the maps demonstrate, the coastal, south Orange County and inland/foothills areas have the highest concentrations of married households and married households with children. The central areas of the County have greater percentages of unmarried and/or female only headed households.

Figure 4-3
Married-Couple Households



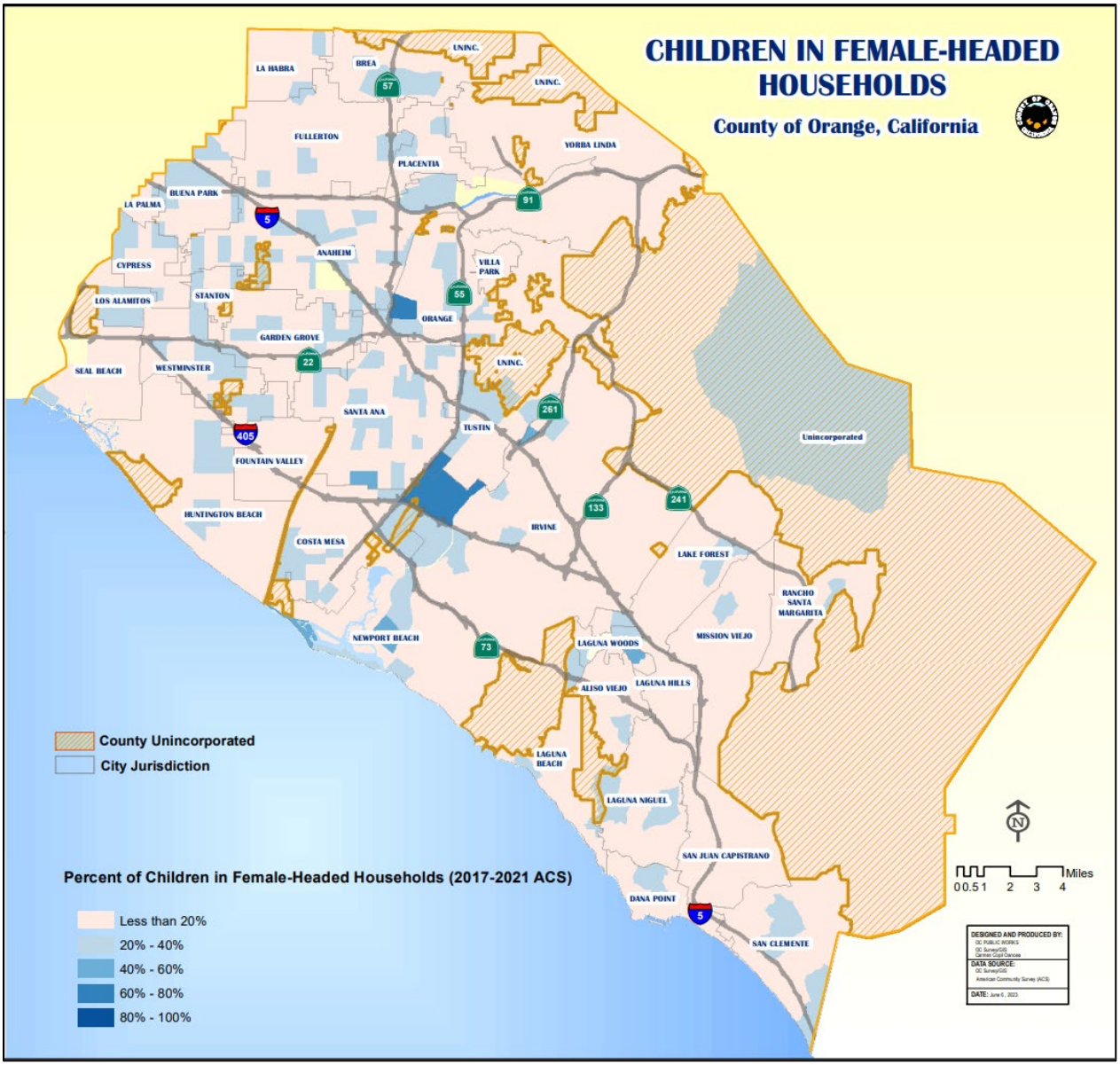
Source: HCD AFFH Data Viewer, 2022

Figure 4-4
Children in Married-Couple Households



Source: HCD AFFH Data Viewer, 2022.

Figure 4-5
Children in Female-Headed Households



Source: HCD AFFH Data Viewer, 2022

As discussed in the *Populations of Persons with Disabilities* subsection, for the purposes of this analysis, the Unincorporated County areas have been split into subareas: Central, North, and South Orange County. The following analysis is based on Unincorporated County area tract-level data using the 2022 and 2012 ACS (5-year estimates).

As shown in **Table 4-8**, approximately 30.6% of households in the Unincorporated County areas consist of both the householder and their children. The South County area has the largest proportion of households with children (32.9%) compared to the North County (31.5%) and Central County (26.4%). Over the last ten years, the proportion of households with children has decreased in the Unincorporated County areas, including in all subareas. According to the 2012 ACS, 35.8% of households in the Unincorporated County areas had children of the householder, including 29.6% in Unincorporated Central Orange County, 36% in Unincorporated North Orange County, and 42% in Unincorporated South Orange County.

Married couple families represent more than half of households in all Unincorporated County subareas. The North County subarea has a larger proportion of single-parent female-headed households (4.9%) compared to the Central County subarea (3.4%) and South County subarea (3.7%). Approximately 2% of households in Central and North County are single-parent male-headed households compared to 1.4% of households in the South County.

Table 4-8
Households by Familial Status/Children of Unincorporated Subareas

	Central OC	North OC	South OC	Unincorporated Areas
Married-couple family	51.7%	58.4%	61.8%	57.9%
With children	20.9%	24.4%	27.8%	24.8%
Single male-headed	5.8%	6.0%	3.5%	4.9%
With children	2.2%	2.2%	1.4%	1.9%
Single female-headed	9.5%	12.2%	7.9%	9.6%
With children	3.4%	4.9%	3.7%	4.0%
Nonfamily household	32.9%	23.4%	26.9%	27.6%
Total households with children	***26.4%***	***31.5%***	***32.9%***	***30.6%***
Total households	**74,734**	**76,535**	**108,095**	**259,364**

Source: American Community Survey, 5-Year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Income Status

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51% of the population is LMI (based on HUD income definition of up to 80% of the Area Median Income).

The average income amongst census tracts that include Unincorporated County areas is $173,274. The Unincorporated South Orange County area has the highest average income of $207,678 compared to Central ($162,640) and North Orange County ($145,589). The median income for Unincorporated County areas is $134,282. According to the 2022 ACS, Orange County as a whole (incorporated and Unincorporated County areas) has a median household income of $109,361 and an average household income of $147,182. Over the last decade, the household incomes in the Unincorporated County areas have increased. According to 2012 ACS estimates, the average income in Unincorporated Central County was $112,057, $101,759 in North County, and $143,173 in South County. The average household income in the Unincorporated County areas as a whole was $118,354 and the median household income was $83,850.

Compared to other counties in the region, the median and average household incomes in Orange County, including in the Unincorporated County areas, are higher than in Los Angeles County ($83,411 and $119,756, respectively), Riverside County ($84,505 and $110,021, respectively), San Bernardino County ($77,423 and $100,078, respectively), and San Diego County ($96,974 and $129,234, respectively).

According to 2023 HCD State Income Limits, the Area Median Income (AMI) for Orange County is $127,800 for a four-person household.[21] State income limits for a four-person household in Orange County are as follows:

- $114,800 or less – Lower-Income
- $114,800 - $127,800 – Median
- $127,800 - $153,350 – Moderate-Income
- >$153,350 – Above-Moderate-Income

Only 42.3% of households in the Unincorporated Central area, 45.3% in the Unincorporated North area, and 32% in the Unincorporated South area earn less than $100,000. A large proportion of households in all subareas earn more than $150,000 and would be considered

[21] California Department of Housing and Community Development (HCD). 2023. 2023 State Income Limits. https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2023.pdf.

above-moderate-income households, including 37.7% in the Central subarea, 36.9% in the North subarea, and 50.6% in the South subarea.

As discussed above, the North subarea, with the largest proportion of households earning less than $100,000, also has the largest proportion of single-parent female-headed households and population of persons with disabilities compared to the Central and South Unincorporated County areas.

Table 4-9
Household Income of Unincorporated Subareas

Household Income	Central OC	North OC	South OC	Unincorporated Areas
<$10,000	4.0%	3.6%	3.5%	3.7%
$10,000 - $14,999	1.9%	2.6%	1.3%	1.9%
$15,000 - $24,999	3.5%	3.6%	2.8%	3.3%
$25,000 - $34,999	4.0%	3.9%	3.2%	3.6%
$35,000 - $49,999	6.5%	7.2%	4.1%	5.7%
$50,000 - $74,999	11.2%	11.9%	8.5%	10.3%
$75,000 - $99,999	11.1%	12.6%	8.5%	10.5%
$100,000 - $149,999	20.0%	17.7%	17.4%	18.3%
$150,000 - $199,999	12.3%	14.9%	13.5%	13.5%
$200,000+	25.4%	22.0%	37.1%	29.3%
Median income	--	--	--	$134,282
Average income[1]	$162,640	$145,589	$207,678	$173,274
Total households	**74,734**	**76,535**	**108,095**	**259,364**

Source: American Community Survey, 5-Year Estimates, 2022.
Note (1): The average income was calculated based on averages of all tracts in each subarea that contain Unincorporated County areas.

Overpayment

According to State housing policy, overpaying occurs when housing costs exceed 30% of gross household income. **Table 4-10** displays recent estimates of households in Unincorporated CDPs that are overpaying for housing. According to SCAG, and as shown in **Table 4-11**, over 50% of all renter households in the Unincorporated County areas were overpaying for housing. **Table 4-12** displays mortgage-holding households (owners) in the Unincorporated County areas overpaying for housing. Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For

lower-income renters, severe cost burden can require families to double up resulting in overcrowding and related problems.

Table 4-10
Household Cost Burden – Unincorporated CDPs and Orange County

Income	Orange County		Unincorporated CDPs	
	Household Cost Burden		Household Cost Burden	
	>30%	>50%	>30%	>50%
Household Income less-than or = 30% MFI	135,715	114,560	1,960	1,685
Household Income >30% to less-than or = 50% MFI	101,280	48,175	1,590	1,125
Household Income >50% to less-than or = 80% MFI	97,005	22,425	2,350	1,030
Household Income >80% to less-than or = 100% MFI	33,515	4,100	1,160	210
Household Income >100% MFI	40,440	3,670	2,600	400
Total Households	**407,955**	**192,930**	**9,660**	**4,454**

Source: HUD CHAS, 2019
Note: MFI refers to the HUD Area Median Family 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. MFI 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.
Note: MFI in Orange County in 2019 was $97,900 as determined by HUD
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 4-11
Renter Overpayment by Income Category
Unincorporated Orange County

% of Income Paid for Housing	Renters	
	Households	%
All households	9,354	100.0%
Less than 10%	265	2.83%
10-14.9%	776	8.30%
15-19.9%	686	7.33%
20-24.9%	1,035	11.06%
25-29.9%	1,023	10.94%
30-34.9%	1,029	11.0%
35-35.9%	695	7.43%
40-49.9%	853	9.12%
50% or more	2,328	24.89%
Not computed	664	7.10%
Households overpaying	4,905	52.40%
Source: SCAG Pre-Certified Local Housing Data – August 2020		

Table 4-12
Homeowner Overpayment by Income –
Unincorporated Orange County

% of Income Paid for Housing	Number of Households by Annual Income				
	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 or more
Over 30%	499	635	714	1,834	5,485
20-29%	0	21	64	209	6,904
Under 20%	0	0	15	194	8,192
Source: SCAG Pre-Certified Local Housing Data – August 2020					

As the above tables demonstrate, 1,960 households in Unincorporated Orange County areas making less than 30% of the AMI are having to pay more than 30% of their income to household costs. According to SCAG Pre-Certified Local Housing Data, there are a total of 41,617 households in Unincorporated Orange County. Thus, 4.7% of all households in Unincorporated Orange County areas have to pay more than 30% of their income to household costs. This means that extremely and very low-income households are disproportionately impacted by overpayment in Unincorporated County areas. In addition, 52.44% of renters in Unincorporated County areas

pay 30% or more of their income for rental costs. These numbers demonstrate that more than 50% of renters are overpaying, which again, disproportionately impacts lower-income households. According to SCAG data, 9,167 households or 22% of mortgage holding (homeowner) households in Orange County pay more 30% or more of their income for housing costs. According to SCAG data, 5,485 homeowners, or 22% of all homeowners covered in **Table 4-12**, making $75,000 or more are still paying more than 30% of their income towards housing costs. Approximately 7% of all households in Unincorporated County areas making less than $50,000 per year are paying over 30% of their incomes to housing costs.

According to the most recent *Orange County Analysis Of Impediments To Fair Housing Choice, April 2020* (Orange County AI), "[t]here are 194,569 households in [all of] Orange County experiencing housing cost burden, with monthly housing costs exceeding 30 % of monthly income. 104,196 of these households are families. However, Orange County has only 429 Project-Based Section 8 units and 33 Other Multifamily units with more than one bedroom capable of housing these families. Housing Choice Vouchers are the most utilized form of publicly supported housing for families, with 2,286 multi-bedroom units accessed. Large family households are also disproportionately affected by housing problems as compared with non-family households. Some focus groups have communicated that regulations and cost issues can make Orange County too expensive for families. The high percentage of 0-1- bedroom units in publicly supported housing and the low percentage of households with children in publicly supported housing support this observation."

Based on the data, the households experiencing monthly housing costs exceeding 30% of monthly income in Unincorporated Orange County areas make up only 1% of the households in all of Orange County facing household cost burden. This is not a significant percentage demonstrating that the Unincorporated Orange County areas do not face significant cost burden challenges compared to other jurisdictions in the County.

Table 4-13
Median Household Income in Unincorporated Areas

Unincorporated CDP or Area	Median Household Income	% of County Median Income	No. of Land Inventory Sites (Parcels)
Coto de Caza CDP	$210,990	210%	0
El Modena Area (Approx. Avg. Median)	$110,667	110%	181
Ladera Ranch CDP	$169,706	169%	0
Las Flores CDP	$147,404	147%	0
Midway City CDP	$48,323	48%	35
Modjeska CDP	$103,967	103%	0
North Tustin CDP	$157,487	157%	2
Orange-Olive Area (Approx. Avg. Median)	$129,636	129%	58
Rancho Mission Viejo CDP	$152,989	152%	14
Rossmoor CDP	$153,750	153%	6
Silverado CDP	$90,938	90%	0
Stanton Area (Approx. Avg. Median)	$70,360	70%	2
Trabuco Canyon CDP	$164,417	164%	0
West Anaheim Area (Approx. Avg. Median)	$71,866	72%	27
Williams Canyon CDP	N/A	N/A	0

Source: American Community Survey, 5-Year Estimates, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

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: R/ECAPs must have a non-white population of 50% or more. Regarding the poverty threshold, Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation (June 2020) defines neighborhoods of extreme poverty as census tracts with 40% 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 R/ECAP if it has a poverty rate that exceeds 40% 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. 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 identify and establish themselves in new places. Overall, it is important to study and identify these areas to understand patterns of segregation and poverty in the County.

In 1990, one R/ECAP was present in Orange County, along E. La Palma Ave in Yorba Linda. This R/ECAP had a low population, with 82 total residents. 47.56% of the population was Hispanic, 8.54% was Asian, and the remainder were White. By 2000, the R/ECAP present in Orange County had shifted slightly to the West, in the area between E. Orangethorpe Ave and E. Frontera St. This R/ECAP remained sparsely populated, with 302 residents, 19.21% of which were White, 0.99% were Native American, 4.64% Asian or Pacific Islander, and 75.17% Hispanic. The original R/ECAP had a larger Hispanic population than before, and a shrinking White population. Another R/ECAP appeared in the northernmost portion of the University of California, Irvine campus, likely due to the presence of students. The R/ECAP had 2,672 residents, which were 34.73% White, 1.57% Black, 0.41% Native American, 53.41% Asian or Pacific Islander, and 7.49% Hispanic.[22]

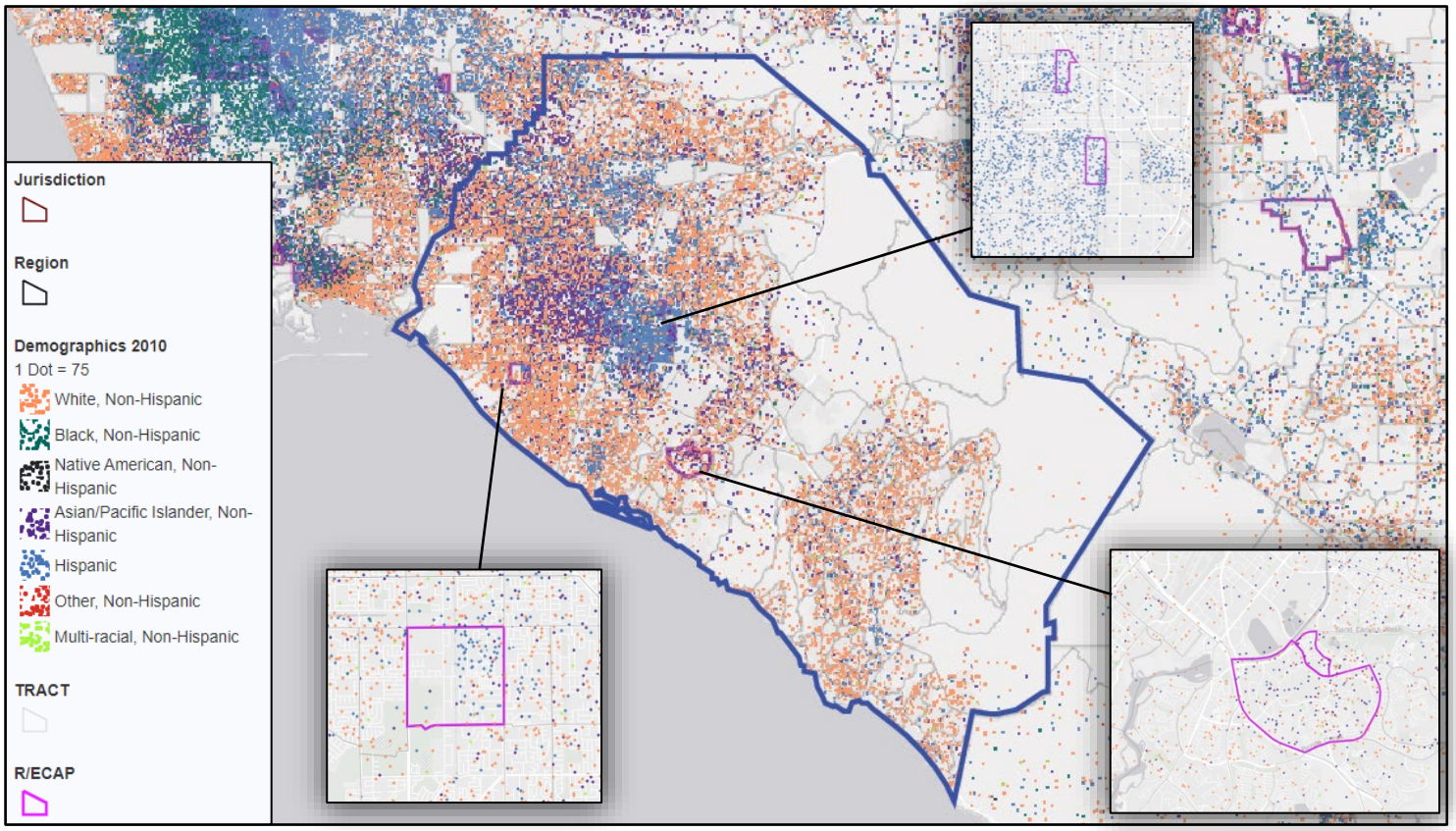
By 2010, the R/ECAP in Santa Ana was no longer present. The high level of fluctuation in this R/ECAP indicates that the area hovers around the 40% poverty threshold to qualify as a R/ECAP. The second R/ECAP, which appeared on the University of California, Irvine campus is again likely caused by the presence of diverse students, though increasing poverty is also likely a factor. All the areas with R/ECAPs in the maps above once again were present in the most current map of R/ECAPs, suggesting that these will be continued areas for concern in the future.

Figure 4-6 below displays the R/ECAP analysis of the Orange County area. The figure shows there are five pockets of racially or ethnically concentrated areas of poverty in the northern and central areas of Orange County; however, none are located within Unincorporated Orange County. There are also R/ECAPs in neighboring communities to the north and to the west. The County is committed to increasing housing mobility throughout Orange County and the region. This Housing Element outlines housing opportunities, affordable housing, and fair housing strategies to increase opportunities to all households.

In comparison to Orange County's 5 R/ECAP areas, San Diego County has 18 R/ECAP areas with the majority located in the south-west region. Additionally, Los Angeles County has 134 R/ECAP areas with the majority located in the south-west portion of the County.

[22] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

Figure 4-6
R/ECAP Areas in Orange County



Source: HUD Affirmitaevly Furthering Fair Housing Data and Mapping Tool, Data Versions: AFFHT0006, July 10, 2014

While the following may be contributing Factors to R/ECAPs, there are no such areas in the Unincorporated areas of Orange County, thus, addressing these areas is not a priority for the County:

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Location and type of affordable housing

- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination

  Source of income discrimination[23]

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.

The ROI: People (**Figure 4-7**) is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

- **Educational 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/Environmental 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.

The ROI: Place (**Figure 4-8**) is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

[23] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

- **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 U.S. citizenship.

As the figures show, the majority of Orange County is classified as high opportunity zones with pockets of low opportunity in the north central area. This indicates generally high levels of relative opportunities that people can achieve as well as high levels of relative opportunities that the County provides. **Table 4-14** below identifies the County's overall opportunity indicators compared to the State. The data shows the following key findings:

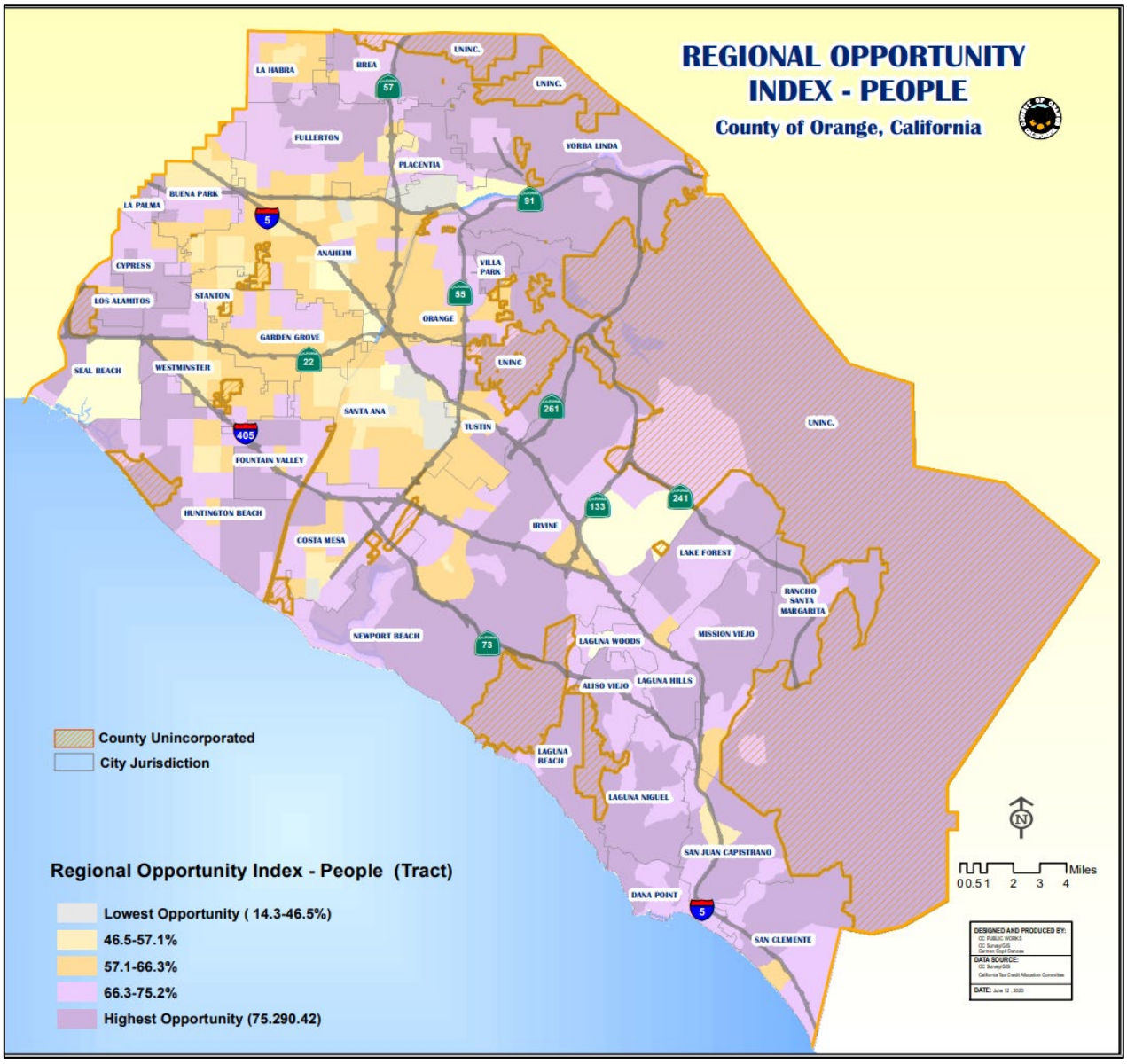
- The County has higher rates of college educated adults, high school graduates, and University of California (UC)/California State University (CSU) eligible students.
- Orange County residents experience higher employment rates and minimum basic income rates than the State. The County has a higher job availability rate and higher job quality.
- Orange County has a higher homeownership rate, but the cost housing affordability rate is lower than the State.
- Commute times are higher in Orange County, but County residents have higher access to vehicles.
- Overall health and environmental opportunities are comparable to the State. However, Orange County has higher access to prenatal care and health care availability.
- Orange County has comparable voting rates as the State, but Orange County residents have lower English-speaking rates and lower citizenship rates.

Table 4-14
Local and State Regional Opportunity Indicators (ROI) for Place and People

ROI Indicator		Orange County	California
Education	**People**		
	College Educated Adults	44%	38%
	Math Proficiency	77%	70%
	English Proficiency	72%	65%
	Elementary Truancy	16%	24%
	Place		
	High School Graduation Rate	92%	83%
	UC/CSU Eligibility	48%	41%
	Teacher Experience	54%	36%
	High School Discipline Rate	4%	6%
Economic	**People**		
	Employment Rate	92%	89%
	Minimum Basic Income	70%	64%
	Place		
	Job Availability	859.93	701.75
	Job Quality	42%	40%
	Job Growth	2%	3%
	Bank Accessibility	0.27	0.24
Housing	**People**		
	Home Ownership	58%	55%
	Housing Cost Burden	52%	52%
	Place		
	Housing Advocacy	89%	91%
	Housing Affordability	0.16	0.19
Mobility	**People**		
	Vehicle Availability	90%	86%
	Commute Time	61%	60%
	Internet Access	4.70	4
Health and Environment	**People**		
	Infant Health	95%	95%
	Birth to Teens	5%	7%
	Years of Life Lost	23.37	29.84
	Place		
	Air Quality	10.44	10.01
	Prenatal Care	90%	83%
	Access to Supermarket	53%	53%
	Health Care Availability	2.28	1.76
Civic Life	**People**		
	Voting Rates	31%	31%
	English Speakers	87%	88%
	Place		
	US Citizenship	81%	83%
	Neighborhood Stability	85%	85%

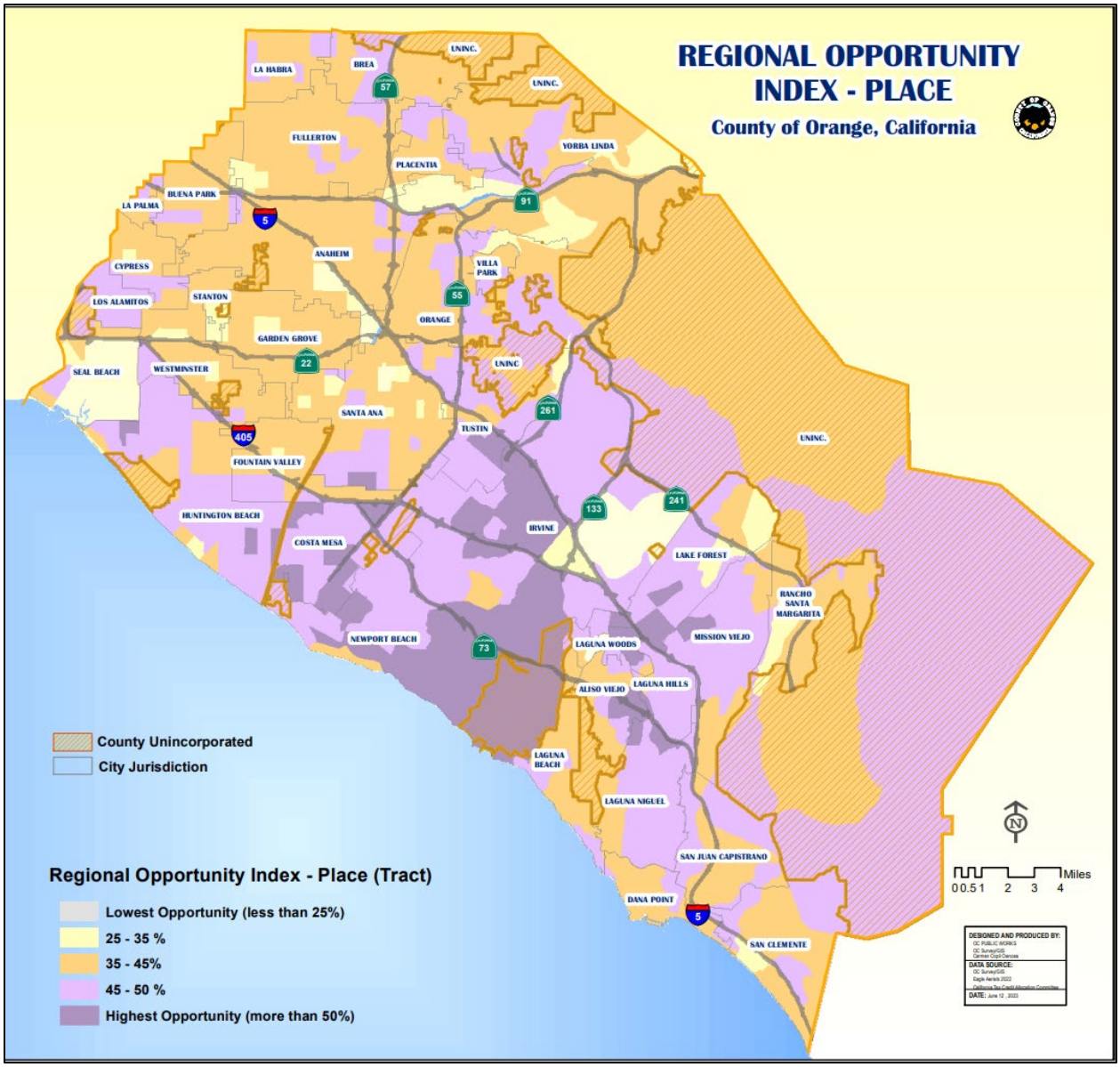
Source: UC Davis Center for Regional Change and Rabobank, 2014.

Figure 4-7
Regional Opportunity Index: People, 2014



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

Figure 4-8
Regional Opportunity Index: Place, 2014



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

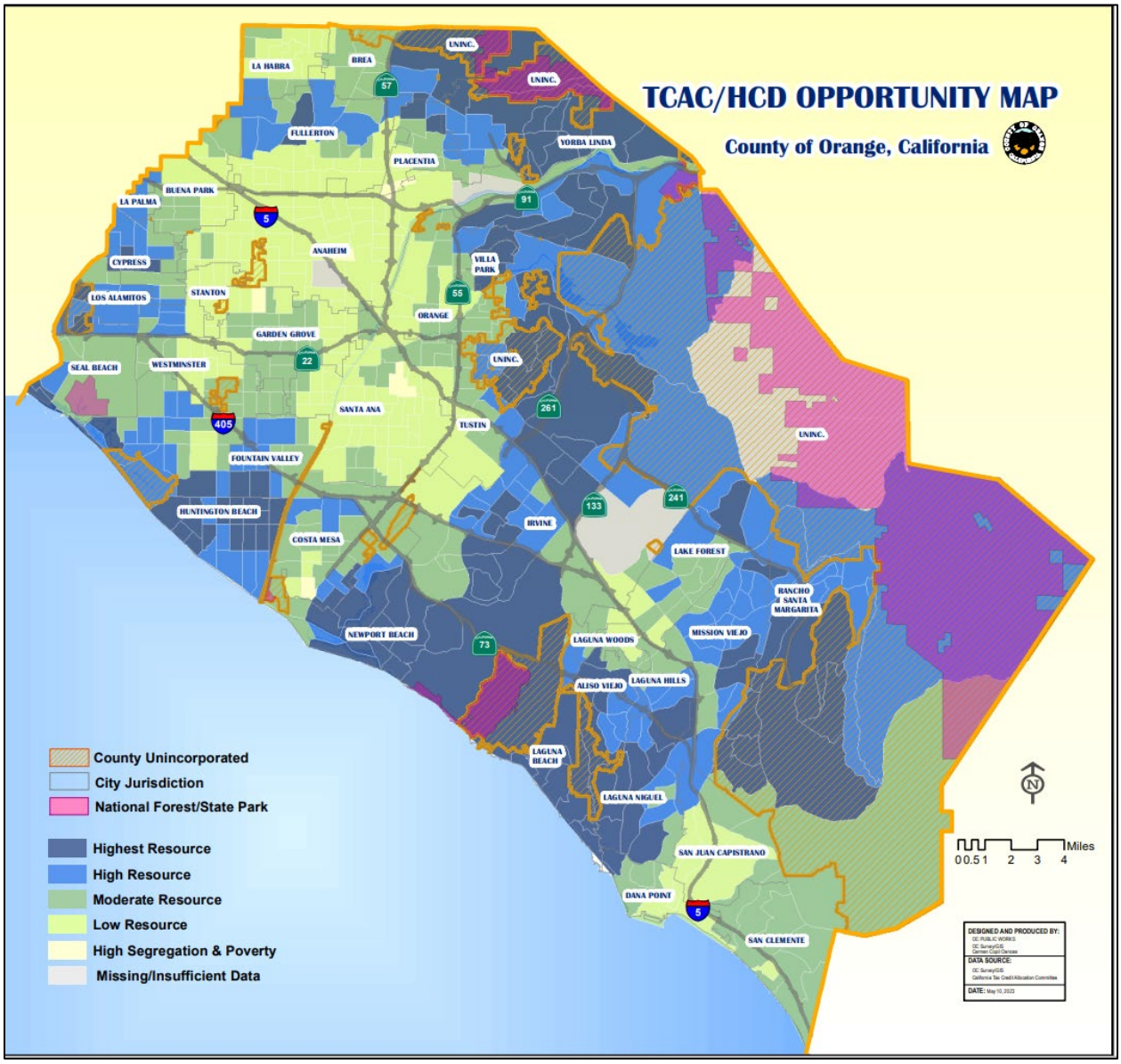
Opportunity Area Maps

HCD together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force (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 20% of the tracts in each region with the highest relative index scores to the "Highest Resource" designation and the next 20% to the "High Resource" designation. Each region then ends up with 40% 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.

As shown in **Figure 4-9** below, Orange County has large pockets of low resource and high segregation and poverty areas surrounded by moderate to high resource communities. The Cities of Anaheim, Santa Ana, Westminster, Lake Forest, and San Juan Capistrano have concentrations of low resources areas. The high segregation and poverty areas are mostly found in the north-central region of the County. The County is committed to exploring programs and methods of increasing housing access and opportunity to both existing residents, future residents, and households in nearby areas.

Figure 4-9
TCAC/HCD Opportunity Map



Source: California Tax Credit Allocation Committee and Department of Housing and Community Development, 2021.

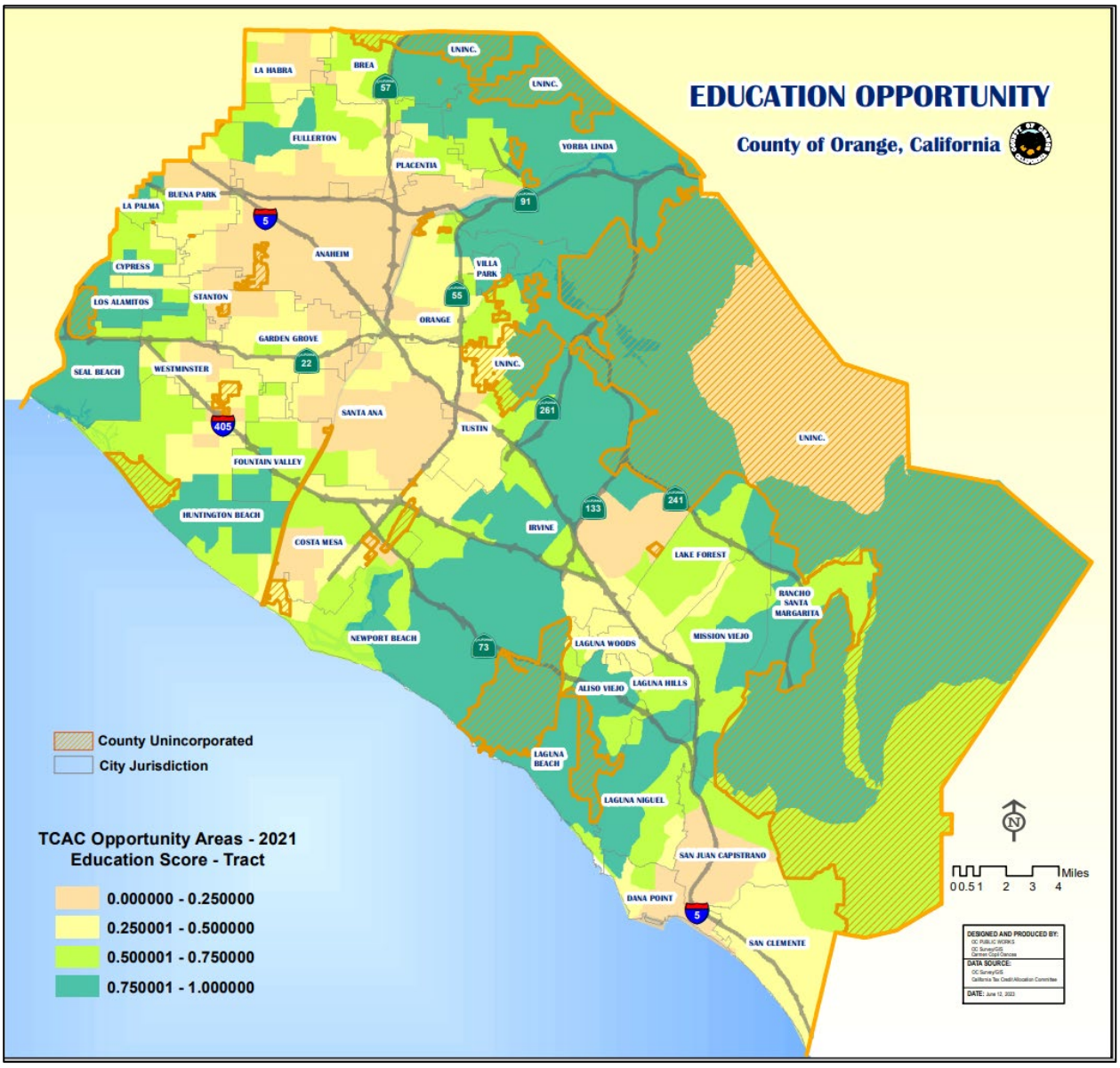
Education Opportunity

The TCAC/HCD Opportunity Area Maps include education data, as illustrated in **Figure 4-9**. 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.

As **Figure 4-10** shows, Orange County is categorized as having high positive education outcomes in the coastal, southern, and southeastern regions and less positive education outcomes in the more central regions of Orange County. The TCAC methodology for the 2021 analysis sites household income as a key component to positive educational outcomes. In the context of the maps, there is a positive correlation between census tracts with higher incomes and those with high positive education outcomes. The County has included programs in the Housing Action Plan intended to provide additional opportunities for existing and future residents throughout Unincorporated Orange County.

Figure 4-10
Education Opportunity Map



Source: HCD AFFH Data Viewer, TCAC Opportunity Areas, 2021

Economic Opportunity

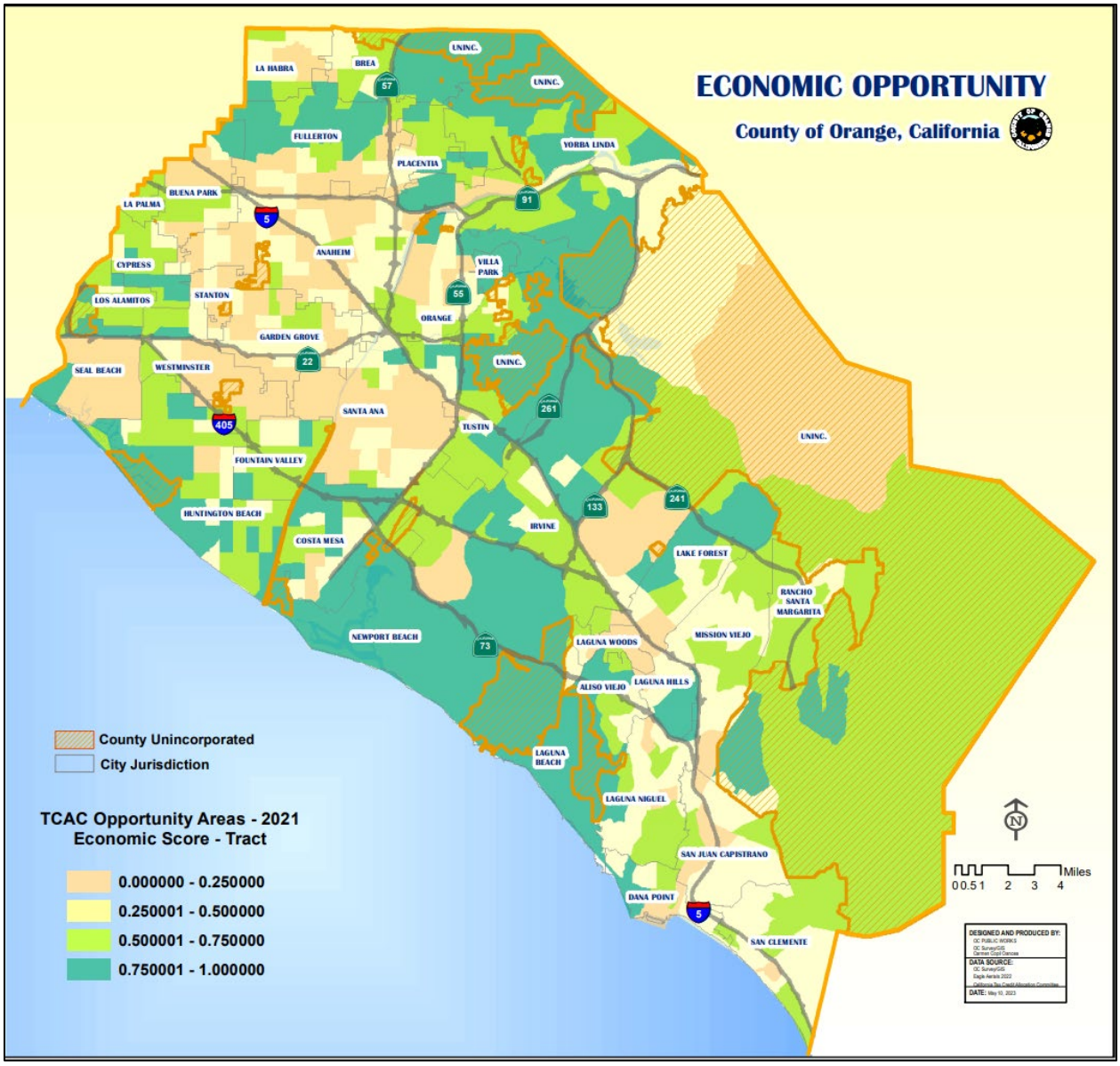
The TCAC/HCD Opportunity Area Maps include economic data, as illustrated in **Figure 4-11**. This data represents opportunity levels based on the following five factors:

- **Poverty** – Percent of population with income above 200% 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 (BA) 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.

As shown in **Figure 4-11** the County has a mix of positive and less positive economic outcomes throughout the region. Positive economic outcomes are generally related to access to education and level of education achieved and proximity to job centers or employment. Key indicators for less positive outcomes are generally related to poverty and home value. Similar to the education analysis above, income and positive employment are closely related. The areas with high positive economic outcomes are the southern, coastal, and eastern regions of the County; these areas include high income cities and communities such as Huntington Beach, Newport Beach, Laguna Beach, Mission Viejo, and Anaheim Hills.

As part of the County's candidate sites analysis, sites have been identified equally throughout the Unincorporated County areas; there are no concentrations of lower-income units identified. As such, the future development of affordable housing may occur in regions of the County providing various levels of opportunity for economic achievement.

Figure 4-11
Economic Opportunity Map



Source: HCD AFFH Data Viewer, TCAC Opportunity Areas, 2021.

Access to Transit

AllTransit, which is an online database that tracks connectivity, access, and frequency in the United States, 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 in **Table 4-15**, Orange County as a whole scored a 4.2 AllTransit performance score, illustrating moderate access to public transit to commute to work. One Unincorporated CDP, the Midway City CDP, has an AllTransit performance score of 5.9, which more closely matches the score of San Diego County as a whole. By contrast, the Coto de Caza, Ladera Ranch, and Las Flores CDPs, which are all located to the east of the center of the County and border wilderness areas, are lacking access to transportation, which may pose a challenge for future development in those areas. Those three CDPs, however, are mostly built out in accordance with Development Agreements and thus, additional development in those areas is unlikely and would be challenging to develop further due to fire hazards and other issues. Access to transportation increases both economic and environmental/health opportunities. As **Figure 4-12** shows, the north-western portion of the county is well connected. The eastern region is made up of mountainous area which decreases accessibility; however, there is a lack of connectivity in the southern region of Orange County.

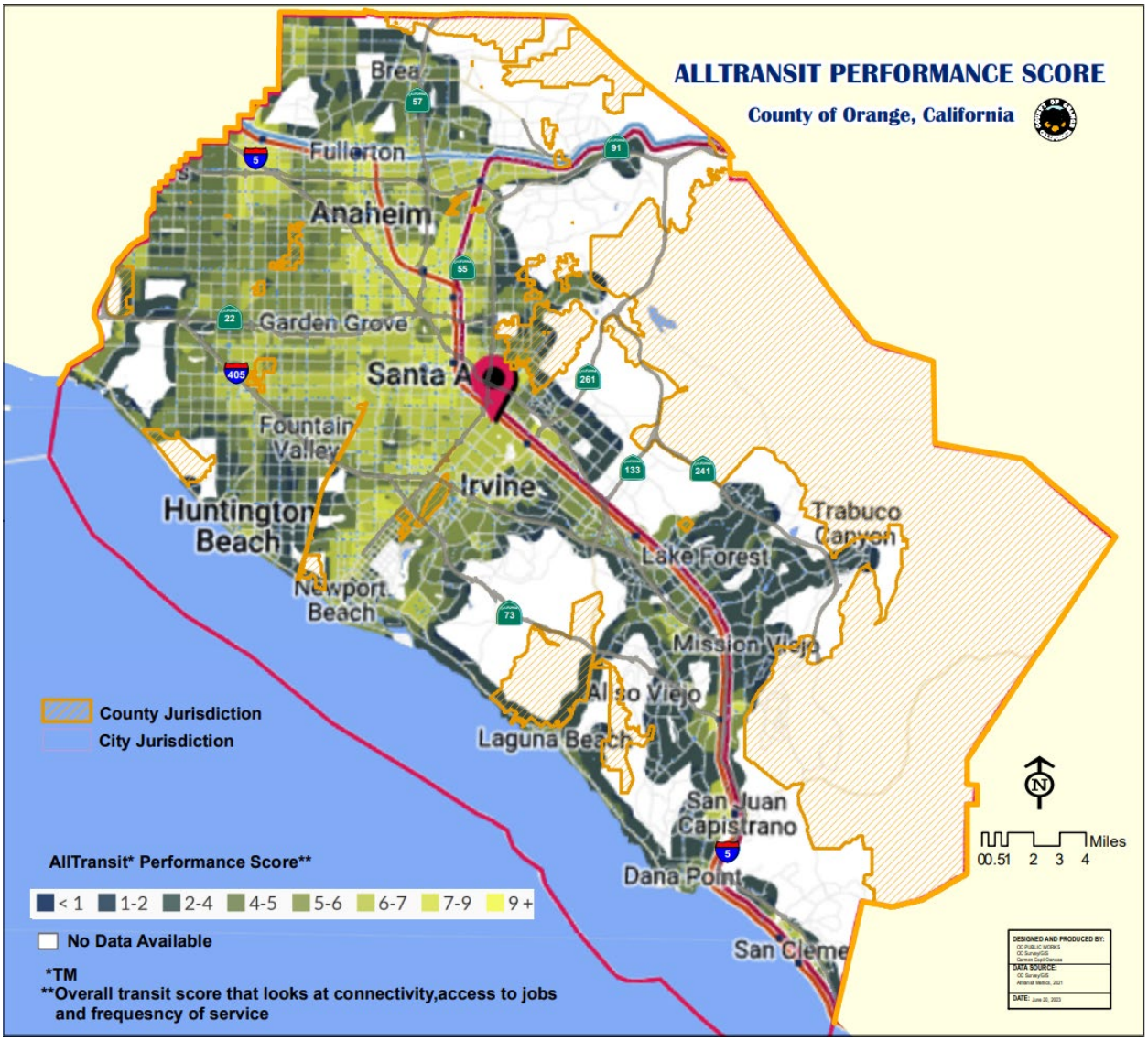
In comparison to Orange and San Diego Counties, Los Angeles County has the highest AllTransit Performance Score (6.8), depicting moderate access to public transit to commute to work. San Diego County and Orange County have similar transit scores, with San Diego County reporting a higher overall score.

Table 4-15
Orange County Transit Indicators, 2019

Jurisdiction	AllTransit Performance Score	Transit Trips Per Week within ½ Mile	Jobs Accessible in 30-Min Trip	Commuters Who Use Transit	Transit Routes Within ½ Mile
Orange County	4.2	528	172,595	2.28%	4
Coto de Caza CDP	0.1	16	1,845	0.41%	0
Midway City CDP	5.9	1,043	226,650	1.38%	8
Ladera Ranch CDP	0.2	3	534	0.16%	1
Las Flores CDP	0.3	22	6,814	0.00%	0
North Tustin CDP	2.8	262	109,250	0.35%	2
Rossmoor CDP	3.1	212	91,634	1.52%	3
Los Angeles County	6.8	2,608	321,664	6.66%	8
San Diego County	5.3	1,358	82,735	3.28%	4

Source: Center for Neighborhood Technology 2019, AllTransit.

Figure 4-12
AllTransit Performance Score – Orange County



Source: AllTransit Metrics, 2021.

Environmental Justice

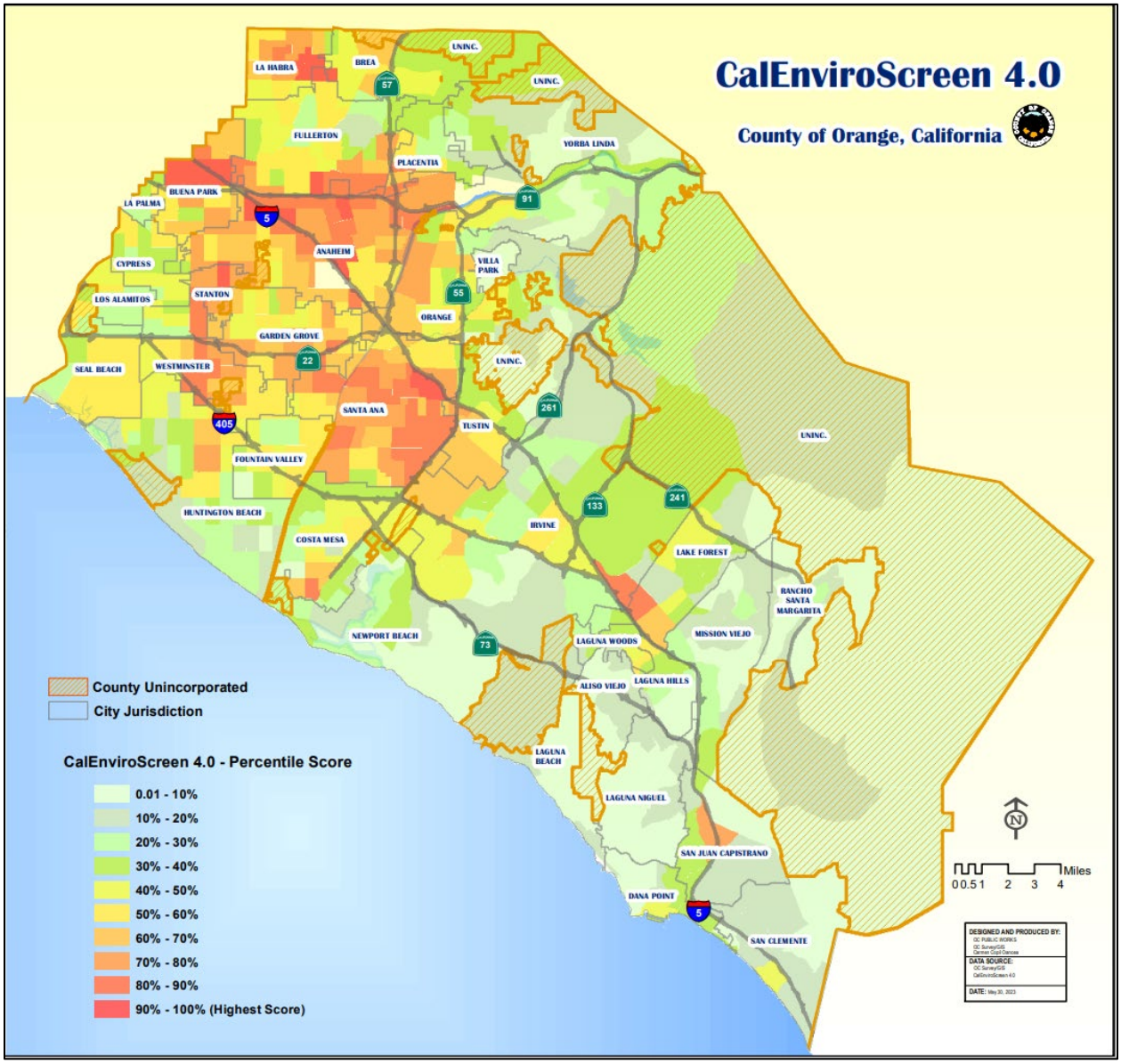
The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). In addition 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), CalEnviroScreen 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.

The CalEnviroScreen Model is made up of a suite of 20 statewide indicators of pollution burden and population characteristics associated with increased vulnerability to pollution's health effects. The model identifies areas of health risk by conducting the following:

> Uses a weighted scoring system to derive average pollution burden and population characteristics scores for each census tract.
>
> Comparing these scores for a given census tract to the other tracts in the state by multiplying the pollution burden and population characteristics components together.
>
> The final CalEnviroScreen score measures the relative pollution burdens and vulnerabilities in one census tract compared to others and is not a measure of health risk.

Figure 4-13 shows the central and northern region of the County are generally high scoring. The majority of the southern area of the county is low scoring and has low pollution burdens. Overall, high scores signify high pollution burdens and high exposure to harmful pollutants, specifically for residents in low-income census tracts. Low-income residents, or areas with higher percentages of low-income households are often disproportionately affected by poor environmental quality. Providing housing options near essential resources and economic opportunity/jobs can decrease overall vehicle miles traveled (VMT), which in many cases is related to air quality. Additionally, the County may work with developers to implement and increase the use of environmentally friendly materials and strategies.

Figure 4-13
CalEnviroScreen 4.0, Orange County



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022).

Figure 4-14 shows Census Tracts 6059087902 and 6059087805, which both include Unincorporated County areas that scored over the 70th percentile in CalEnviroScreen 4.0. The census tracts have a pollution burden of 87 and 90, respectively. For the Exposure Indicators and the Environmental Effects, these census tracts scored the following:

Census Tract 6059087902:

Exposures

- Ozone: 68
- Particulate Matter 2.5: 45
- Diesel Particulate Matter: 9
- Toxic Releases: 37
- Traffic 40
- Pesticides: 0
- Drinking Water: 16
- Lead from Housing: 7

Environmental Effects

- Cleanup Sites: 0
- Groundwater Threats: 0
- Hazardous Waste: 17
- Impaired Waters: 0
- Solid Waste: 0

Census Tract 6059087805:

Exposures

- Ozone: 43
- Particulate Matter 2.5: 74
- Diesel Particulate Matter: 35
- Toxic Releases: 90
- Traffic 46
- Pesticides: 48
- Drinking Water: 66
- Lead from Housing: 84

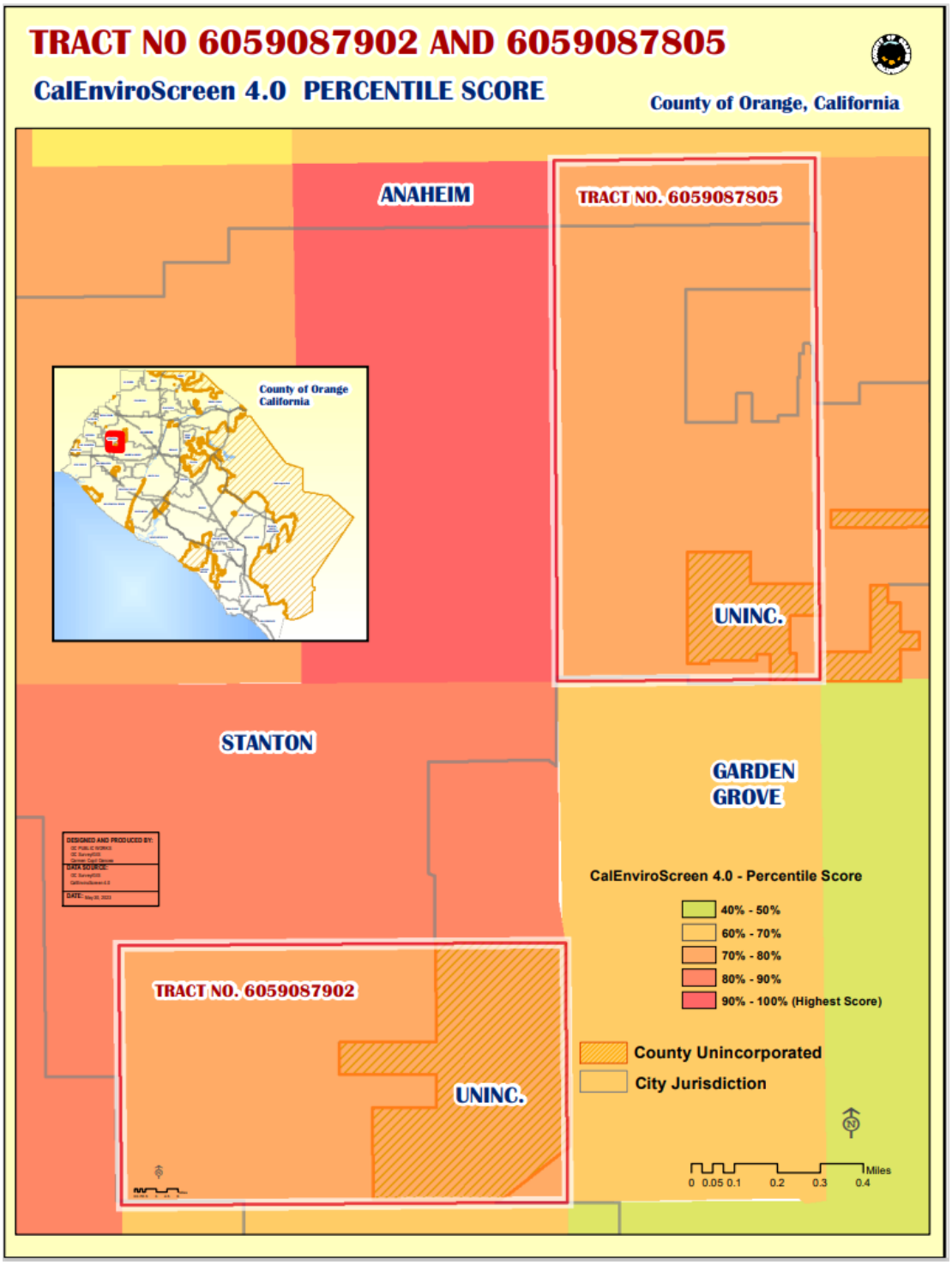
Environmental Effects

- Cleanup Sites: 84
- Groundwater Threats: 65
- Hazardous Waste: 95
- Impaired Waters: 0
- Solid Waste: 36

The census tract 6059087902 is located just south of the City of Stanton and is made up of single- and multifamily uses, and a variety of commercial uses along Beach Boulevard. The census tract is made up of 49.9% Hispanic population, 38.6% Asian American population, and 7.1% White population. Approximately 16.1% of the population includes children ages 10 years and younger, as well as 14.8% seniors 65 years and older.

The census tract 6059087805 is located just east of the City of Stanton and is made up of primarily single-family uses with two commercial parcels along Katella Avenue. The census tract is made up of 49.9% Hispanic population, 38.6% Asian American population, and 7.1% White population. Approximately 16.1% of the population includes children ages 10 years and younger, as well as 14.8% seniors 65 years and older.

Figure 4-14
CalEnviroScreen 4.0, Unincorporated Parcels 6059087902 and 6059087805



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022)

Figure 4-15 shows Census Tract 6059032059 which is one of the lowest scoring Unincorporated census tracts with a CalEnviroScreen 4.0 percentile of two. The census tract has a pollution burden percentile of three. For the Exposure Indicators and the Environmental Effects, the census tract scored the following:

Census Tract 6059032059:

Exposures

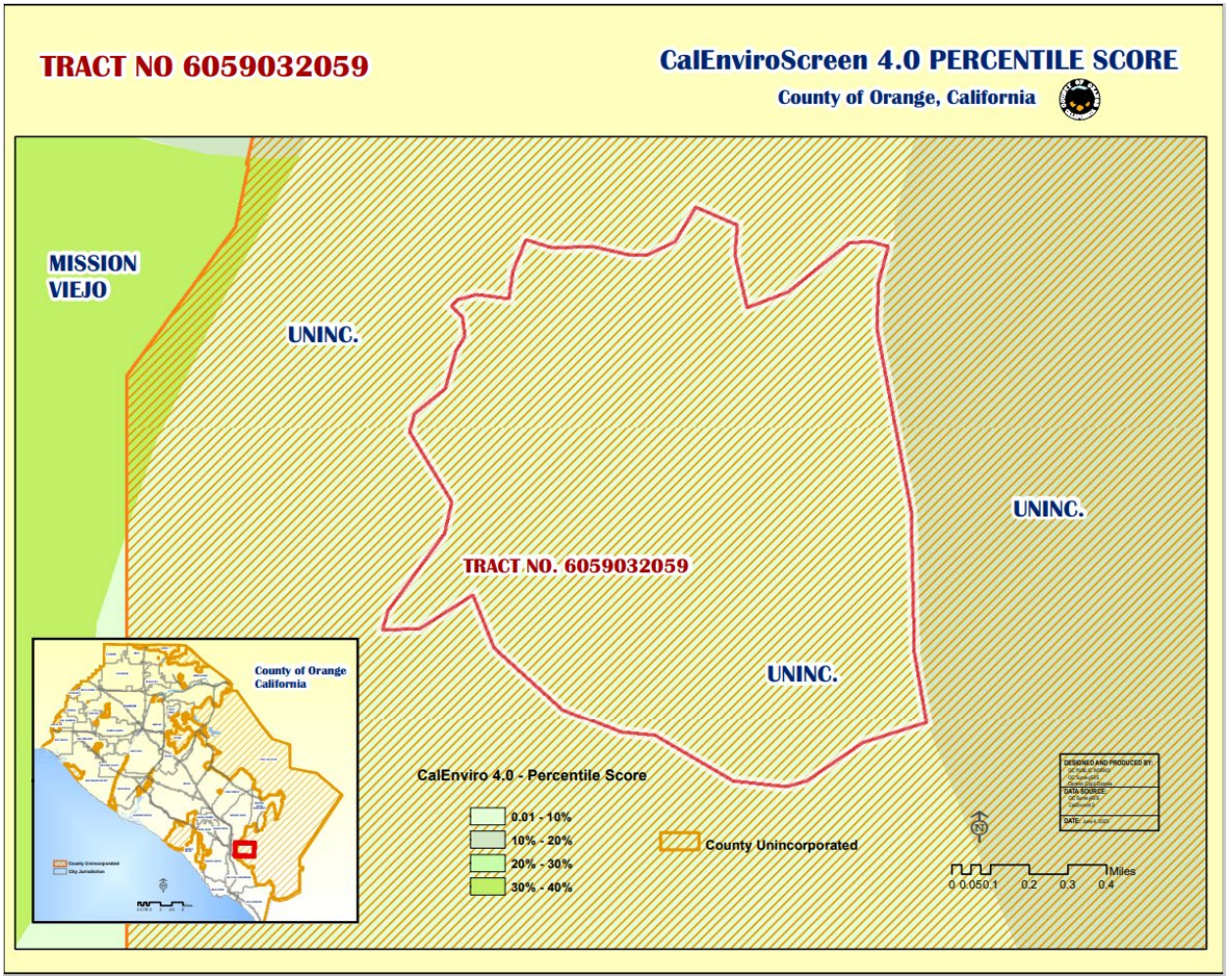
- Ozone: 68
- Particulate Matter 2.5: 45
- Diesel Particulate Matter: 9
- Toxic Releases: 37
- Traffic: 40
- Pesticides: 0
- Drinking Water: 16
- Lead from Housing: 7

Environmental Effects

- Cleanup Sites: 0
- Groundwater Threats: 0
- Hazardous Waste: 17
- Impaired Waters: 0
- Solid Waste: 0

The census tract is located in Ladera Ranch and includes a majority single-family residential uses, some multifamily uses, a middle school, and some commercial uses. The census tract is made up of 63.7% White population, 16.6% Asian American population, and 15.6% Hispanic population. Approximately 22.4% of the population includes children ages 10 years and younger, as well as 5.7% seniors ages 65 years and older.

Figure 4-15
CalEnviroScreen 4.0, Unincorporated Parcel 6059032059



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022).

Conclusion and Trends in Disparities in Access to Opportunities

Generally, access to opportunity is highest for non-Hispanic Whites and Asians/Pacific Islanders in Orange County. By contrast, access to opportunity is generally lower for Black residents than for non-Hispanic Whites and Asians and access is lowest for Hispanics. Metrics are lower on average in census tracts with more of each of these groups. Geographically, access to economic, environmental, and educational opportunity is generally lowest in portions of North Orange County. Anaheim, Garden Grove, Santa Ana, and Westminster all have relatively low scores across various dimensions of opportunity. Access to opportunity is also low in San Juan Capistrano. However, access to transportation is generally better in North Orange County than in South Orange County. There are Unincorporated County areas in all of these locations, but none of these Unincorporated County areas provides low opportunities generally.

Disproportionate Housing Needs and Displacement

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

A variety of factors affect housing needs for different households. In particular, income, other household characteristics, and disability are taken into consideration when proposing the type and size of housing units needed by different households, as well as accessibility of housing based on existing units in a jurisdiction. **Tables 4-16** and **4-21** show data for demographic characteristics of Orange County as a whole and Unincorporated County areas and CDPs if data was available, as compared to the State of California. Additional detailed analysis of the community's demographics is outlined in the Community Profile, Section 2, of this Housing Element.

The U.S. Department of Housing and Urban Development (HUD) designates four specific types of housing problems, which, if a household experiences at least one of, the households are considered to be facing housing problems. Those are: (1) housing unit lacks complete kitchen facilities; (2) housing unit lacks complete plumbing facilities; (3) household is overcrowded; and (4) household is cost-burdened. The Orange County AI found that approximately 45% of all households in Orange County experience some kind of housing problem, with Hispanic households experiencing the highest rate of housing problems. Among housing types, non-family households and households larger than five persons experience the highest rates of housing problems in Orange County.

Housing problems are considered "severe" by HUD if there is a complete lack of kitchen or plumbing, more than one person per room, or a cost burden greater than 50%. The Orange County AI examined households within Orange County experiencing severe housing problems

and found that Hispanic households similarly experience the highest rates of severe housing problems within Orange County. This data indicates that large households (greater than 5 people), non-family households, and Hispanic households disproportionately experience the highest levels of housing problems within Orange County in terms of percentages of total households of those types.

In terms of total numbers, the highest amount of housing problems is experienced by White/Non-Hispanic and Hispanic households, with those same populations experiencing the highest total numbers of severe housing problems. Housing problems are experienced by households of all sizes in Orange County (both family and non-family households), with a large percentage of households of every race/ethnicity experience housing problems, of which Hispanic households experience the highest rates of both housing problems and severe housing problems. As data elsewhere in this section discusses, cost-burden and overcrowding are two of the largest problems facing households in Orange County.

Table 4-16: Housing Problems, Orange County

Demographics of Households with Disproportionate Housing Needs			
Households Experiencing Any of 4 Housing Problems	Orange County		
	# with Problems	# Households	% with Problems
By Race/Ethnicity			
White, Non-Hispanic	206,658	540,773	38.22%
Black, Non-Hispanic	8,074	16,719	48.29%
Hispanic	152,740	241,841	63.16%
Asian or Pacific Islander, Non-Hispanic	84,193	186,038	45.26%
Native American, Non-Hispanic	1,063	2,179	48.78%
Total	**452,728**	**987,550**	**45.84%**
By Household Type and Size			
Family households, <5 people	228,740	576,690	39.66%
Family households, 5+ people	95,050	145,028	65.54%
Non-family households	138,270	273,662	50.53%
By Race/Ethnicity			
White, Non-Hispanic	104,324	540,773	19.29%
Black, Non-Hispanic	4,816	16,719	28.81%
Hispanic	107,752	241,841	44.55%
Asian or Pacific Islander, Non-Hispanic	50,205	186,038	26.99%
Native American, Non-Hispanic	544	2,179	24.97%
Total	**267,641**	**987,550**	**27.10%**

Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

As shown by the **Table 4-16**, in the County, 45.84% of residents overall face 1 of 4 housing problems. White and Asian or Pacific Islander residents have slightly lower rates of housing problems, at 38.22% and 45.26% respectively, while Black residents have a slightly higher rate of 48.29%. Hispanic residents have the highest rates at 63.16% countywide. Native American residents have a rate similar to the average at 48.74%, but the low populations of Native American residents across jurisdictions may lead to misleading data (which is why they are not as frequently discussed here). Housing problems are found in differing rates across family types, with 39.66% for families of 5 or less, 65.59% for families of 5 or more, and 50.53% for non-family households.

Cost Burden and Overpayment

Cost burden and overpayment must be viewed considering income data. **Table 4-17** shows that Orange County and the Unincorporated County areas have a higher household median income than the state overall. In the Unincorporated areas approximately 58% of households earn over $100,000 in annual income. This is a greater percentage than in Orange County as a whole and the State. Just under 50% of households in Orange County earn an annual income over $100,000, while 37.7% of households in California earn that same amount. Generally, a higher percentage of married couple households typically result in a higher median income in a community as these households may have more than one income source. Higher income provides means for safe and sufficient housing, as well as the ability to update and renovate older attributes of the home.

As previously stated, the State uses five income categories for the purpose of determining housing affordability and need in communities based on area median income (AMI), which refers to the midpoint of the income distribution for a specific geographic area, as defined by the U.S. Department of Housing and Urban Development (HUD) using data from the U.S. Census Bureau.

HUD annually develops median household income estimates based on census data for the purpose of determining program eligibility. All jurisdictions in Orange County, including the County, use HUD's annual median household estimate to determine eligibility for its affordable housing programs. The median household income that HUD developed to determine eligibility in in Orange County as a whole for the past several years was as follows:

- 2019 $97,900
- 2020 $103,000
- 2021 $106,700
- 2022 $119,100
- 2023 $127,800

The County's AMI has trended upward each year and for 2023 is $127,800. Using the most recent HUD-determined AMI, the five income eligibility categories are calculated as follows:

- **Extremely Low-income** - 30% or less of AMI (30% or less of the $127,800 AMI for Unincorporated County areas is $38,340 or less)
- **Very Low-income** - 50% or less of AMI (50% or less of the $127,800 AMI for Unincorporated County areas is less than $63,900)
- **Low-income** - 51% to 80% of AMI (51% or less of the $127,800 AMI for Unincorporated County areas is between $65,178 and $102,240)
- **Moderate-Income** - 81% to 120% of AMI (81% to 120% of the $127,800 AMI for Unincorporated County areas is between $103,518 and $153,360)
- **Above Moderate-Income** - more than 120% of AMI (121% of the $127,800 AMI for the Unincorporated County areas is greater than or equal to $154,638)

As shown by **Table 4-17** in Orange County as a whole, using the HUD-developed AMI, approximately 54% of households, compared to approximately 41% of households in the Unincorporated County areas, and 62% of households in the State, are considered extremely, very, or low-income. Thus, approximately 46% of households in Orange County as a whole are considered moderate-income or above.

Table 4-17
Households by Income

Household Income	Unincorporated Areas	Orange County	California
Less than $10,000	4.8%	4.2%	4.8%
$10,000-$14,999		2.7%	4.1%
$15,000-$24,999	5.2%	5.6%	7.5%
$25,000-$34,999	4.0%	6%	7.5%
$35,000-$49,999	5.0%	8.8%	10.5%
$50,000-$74,999	12.0%	14.6%	15.5%
$75,000-$99,999	10.2%	12.8%	12.4%
$100,000-$149,999	18.2%	18.6%	16.6%
$150,000-$199,999	--	11.1%	8.9%
$150,000-$250,000	21.7%	--	--
$200,000 or More	--	15.5%	12.2%
$250,000 or More	18.9%	**--**	**--**
Area Median Income*	**$82,214**	**$90,234**	**$75,235**

Source: American Community Survey, 5-Year Estimates, 2019.
**HUD-developed Area Median Income (AMI)*

As seen in **Table 4-18**, approximately 9% of those in owner occupied units and 41% of those in rental units earning 80% or less of the Unincorporated County areas AMI of $82,214, are facing cost burden or severe cost burden, which means those households are paying 30% or more of their income for housing, In comparison, as shown in **Table 4-19**, in Orange County as a whole, 18% of owner occupied and 46% of rental units in the same income categories are facing cost burden or severe cost burden. Housing cost burden has several consequences for a household, such as displacement from their current home creating limited access to essential goods and employment by potentially increasing commute times and removing available income from other necessities such as food. The data demonstrates that housing affordability is an issue in Orange County for all income categories. Programs 2 through 7 of the County's Housing Action Plan address this issue. In addition, there are a number of funding programs that can address this issue. See Housing Action Plan Section 5.

Table 4-18
Housing Cost as a Percentage of Household Income – Unincorporated Areas

Owner-Occupied Units					
Income Range	**Total Households**	**% of Total Owner Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	539	2.3%	23	30	486
$20,000-34,999	798	3.4%	191	124	483
$35,000-49,999	921	3.9%	208	101	612
$50,000-74,999	1,884	7.9%	523	172	1,189
$75,000+	19,376	81.4%	9,643	5,517	4,216
Zero or Negative Income	298	1.3%	0	0	0
Subtotal	**29,938**	**100%**	**10,588**	**5,944**	**6.986**
Renter-Occupied Units					
Income Range	**Total Households**	**% of Total Renter Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	774	12.6%	0	125	649
$20,000-34,999	569	9.3%	0	28	541
$35,000-49,999	425	6.9%	0	8	417
$50,000-74,999	1,097	17.9%	0	162	935
75,000+	2,640	43.1%	934	1,076	630
Zero or Negative Income	427	7.0%	0	0	0
No Cash Rent	190	3.1%	0	0	0
Subtotal	**6,122**	**100%**	**934**	**1,399**	**3,172**
Total Households	**36,060**	-	-	-	-

Source: American Community Survey, 5-Year Estimates, 2019
** 30% of income spent on housing is considered a "cost burden," and 50% or more of income spent on housing is considered a "severe cost burden" for a household*
Note: Some households are not accounted for; therefore, figures may differ slightly for other U.S. Census estimates for total households.

Table 4-19
Housing Cost as a Percentage of Household Income – Orange County

Owner-Occupied Units					
Income Range	**Number of Households**	**% of Total Owner Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	29,245	4.9%	1,999	1,887	25,359
$20,000-34,999	38,248	6.4%	8,530	5,426	24,292
$35,000-49,999	39,098	6.6%	11,640	5,973	21,485
$50,000-74,999	69,515	11.7%	23,902	10,047	35,566
$75,000+	414,714	70.0%	223,646	109,422	81,646
Zero or Negative Income	4,452	0.8%	0	0	0
Subtotal	**595,272**	**100%**	**269,717**	**132,755**	**188,348**
Renter-Occupied Units					
Income Range	**Number of Households**	**% of Total Renter Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	51,272	11.6%	468	3,308	47,496
$20,000-34,999	54,078	12.2%	1,199	1,598	51,281
$35,000-49,999	51,485	11.6%	1,024	3,003	47,458
$50,000-74,999	80,677	18.2%	2,479	19,533	58,665
75,000+	184,320	41.7%	73,847	76,826	33,647
Zero or Negative Income	10,167	2.3%	0	0	0
No Cash Rent	10,221	2.3%	0	0	0
Subtotal	**442,220**	**100%**	**79,017**	**104,268**	**238,547**
Total Households	**1,037,492**	**-**	**-**	**-**	**-**

Source: American Community Survey, 5-Year Estimates, 2019
** 30% of income spent on housing is considered a "cost burden," and 50% or more of income spent on housing is considered a "severe cost burden" for the household.*
Note: Some households are not accounted for; therefore, figures may differ slightly for other U.S. Census estimates for total households.

Table 4-20 displays data for household tenure (owner vs. renter) for Unincorporated Orange County, Orange County as a whole, and the State. 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 as homeownership allows for increased stability and opportunity to age in place. The data shows that just above half of Orange County and California households own their own home (57.4% and 54.8%, respectively), while just above three-quarters of households in Unincorporated Orange County own their own home. This suggests strong home ownership and stability in the Unincorporated County areas.

Table 4-20
Household Tenure

Household Tenure	Unincorporated Areas	Orange County	California
Owner Households	77.5%	57.4%	54.8%
Renter Households	22.5%	42.6%	45.2%
Total Occupied Housing Units	**41,617**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-year Estimates, 2019, SCAG Pre-Certified Housing Data, 2021

As shown by **Table 4-21** (Demographics of Households with Severe Housing Cost Burden Orange County), severe housing cost burden is a large but not as frequent problem for residents in Orange County. The average rate of residents experiencing severe housing cost burden is 21.55% across the county. Overall, White residents have a rate of 17.30%, Black residents 22.57%, Hispanic residents 24.78%, Data for the Unincorporated Areas was unavailable.

The Orange County Housing Authority (OCHA) administers Section 8 Housing Choice vouchers within the County. According to the 2021 Annual Public Housing Authority (PHA) Plan, the Housing Authority has allocated 11,306 housing choice vouchers, which can relieve cost burden and overpayment.

There are approximately 135 assisted tenants (this includes various types of assistance, not just Housing Choice Vouchers) in Unincorporated County areas. However, OCHA does not have enough funding to issue all the vouchers allocated from HUD. Currently OCHA is not able to issue approximately 750 vouchers. OCHA would need approximately $14,775,000/annually to serve 100% of the allocated vouchers, increased annually to account for inflation. This amount includes both the cost of housing assistance and administration costs. This funding gap is for the entirety of the Housing Choice Voucher Program, not specifically for the Unincorporated County areas. OCHA serves all 34 cities and Unincorporated County areas. Thus, funding for those vouchers should come from a variety of sources, not just the County. The County will continue to pursue funding to be able to issue all allocated vouchers.

Table 4-21
Demographics of Households with Severe Housing Cost Burden, Orange County

Race/Ethnicity	Orange County		
	Number of Households	Number with Severe Cost Burden	% with Severe Cost Burden
White, non-Hispanic	540,773	93,564	17.30%
Black, non-Hispanic	16,719	3,774	22.57%
Hispanic	241,841	59,920	24.78%
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020			

As discussed above, for the purposes of this analysis the Unincorporated County area has been divided into three subareas: Central Orange County, North Orange County, and South Orange County. The data shown below is based on tract-level data of Unincorporated County areas tracts. **Table 4-22, Table 4-23,** and **Table 4-24** show monthly housing costs as a percentage of household income by Unincorporated County subarea and tenure. Most occupied households in all Unincorporated County subareas are owner-occupied. In Central OC, 60.3% of households are owner-occupied, 66% in North OC, and 68.8% in South OC.

According to the 2022 ACS (5-year estimates), 36.1% of owners with a mortgage in Orange County spend less than 20% of their income on housing compared to 31.3% of owners with mortgages in Los Angeles County, 33.9% in Riverside County, 35.5% in San Bernardino County, and 33% in San Diego County. The second largest proportion of owners with mortgages in Orange County (28.6%) spend more than 35% of their household income on housing compared to 34.3% in Los Angeles County, 30.4% in Riverside County, 28% in San Bernardino County, and 30% in San Diego County.

Over the past ten years, the proportion of owners with a mortgage spending more than 35% of their household income has decreased in the Unincorporated County. According to the 2012 ACS (5-year estimates). 38.9% of owners with mortgages paid more than 35% of their monthly income on housing compared to 27.3% during the 2022 ACS.

More than a third of owner-occupied households with a mortgage in the Unincorporated County areas, including all Unincorporated County subareas spend less than 20% of their household income on housing. Nearly 37% of owners with a mortgage in Central Orange County, 37.4% in North County, and 36.3% in South County spend less than 20% of their income on housing. Like the proportion of owners with mortgages spending less than 20% of their income on housing, the proportion of owners with mortgages spending more than 30% of their income on housing is comparable in Central, North, and South Orange County. Approximately 28% of owners with

mortgages in Central OC, 26.4% in North OC, and 27.5% in South OC spend more than 35% of their household income on housing.

Table 4-22
Owner-Occupied Households with a Mortgage
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated County areas
<20%	36.8%	37.4%	36.3%	36.8%
20% - 24.9%	14.7%	16.7%	15.2%	15.5%
25% - 29.9%	11.5%	10.5%	12.8%	11.8%
30% - 34.9%	8.9%	9.0%	8.1%	8.6%
>35%	28.1%	26.4%	27.5%	27.3%
Not computed	0.6%	0.4%	0.7%	0.6%
Total households	**30,265**	**35,018**	**56,081**	**121,364**

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

For owner-occupied households without a mortgage, Orange County as a whole has a smaller proportion that spend more than 35% of their household income on housing (12.7%) compared to the neighboring counties of Los Angeles (14%), Riverside (14.9%), and San Diego (13.5%) but larger than San Bernardino County (11.5%). The proportion of owners without a mortgage paying over 35% of their monthly income on housing has increased over the past ten years. According to the 2012 ACS, 11.6% of owners without a mortgage in the Unincorporated County areas paid more than 35% of their household income on housing compared to 13.4% during the 2022 ACS.

Table 4-23 shows monthly housing costs for owner-occupied households without a mortgage as a percentage of household income. Most owners without a mortgage in all Unincorporated County subareas spend less than 15% of their monthly income on housing, including 66% in Central OC, 65.3% in North OC, 63.7% in South OC, and 64.9% in the Unincorporated County areas. Predictably, the proportion of owners without a mortgage spending more than 35% is smaller than the proportion of owners with a mortgage. South OC has the largest proportion of owners without a mortgage spending more than 35% of their income on housing (15.4%) compared to Central OC (12.3%), North OC (12%), and the Unincorporated County areas as a whole (13.4%). As mentioned above, South OC has the largest proportion of owner-occupied households (compared to renter-occupied households) compared to Central and North OC.

Table 4-23
Owner-Occupied Households without a Mortgage
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated Areas
<10%	50.1%	47.7%	41.8%	46.2%
10% - 14.9%	15.9%	17.6%	21.9%	18.7%
15% - 19.9%	9.7%	10.3%	8.8%	9.5%
20% - 24.9%	5.6%	6.8%	5.8%	6.1%
25% - 29.9%	2.9%	3.2%	3.7%	3.3%
30% - 34.9%	3.5%	2.4%	2.7%	2.9%
>35%	12.3%	12.0%	15.4%	13.4%
Not computed	2.8%	1.5%	2.7%	2.3%
Total households	**14,220**	**15,105**	**17,429**	**46,754**

Source: American Community Survey, 5-year Estimates, 2022. Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Renter-occupied households tend to experience cost burden at a higher rate than owner-occupied households. According to the 2022 ACS, the largest proportion of renters in Orange County spend more than 35% of their monthly household income on housing (46.1%). In comparison, 47.9% of renters in Los Angeles County, 48% in Riverside County, 47.9% in San Bernardino County, and 47.3% in San Diego County spend more than 35% of their household income on housing. Between the 2012 and 2022 ACS, the proportion of renter-occupied households in the Unincorporated County areas has remained relatively constant. During the 2012 ACS, 45.4% of renters paid more than 35% of their household income on housing compared to 45.6% in 2022.

As shown in **Table 4-24**, nearly half of renters in all Unincorporated County subareas spend more than 35% of their monthly household income on housing including 46% in Central OC, 47.9% in North OC, and 43.4% in South OC.

Table 4-24
Renter-Occupied Households
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated Areas
<15%	9.3%	6.5%	10.3%	8.8%
15% - 19.9%	9.1%	10.0%	10.2%	9.8%
20% - 24.9%	12.5%	11.6%	13.2%	12.5%
25% - 29.9%	12.7%	13.3%	12.1%	12.7%
30% - 34.9%	10.4%	10.7%	10.8%	10.6%
>35%	46.0%	47.9%	43.4%	45.6%
Not computed	5.9%	5.3%	7.7%	6.4%
Total households	**28,045**	**24,708**	**31,333**	**84,086**

Source: American Community Survey, 5-year Estimates, 2022. Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Overcrowding

Table 4-25 displays data for overcrowding in the Unincorporated County areas, Orange County, and the state. Overcrowding is defined as 1.01 to 1.5 persons per bedroom living in a household, and severe overcrowding is defined as more than 1.51 persons per bedroom. Overcrowding often occurs when nonfamily members combine incomes to live in one household, such as roommates. It also occurs when there are not enough size appropriate housing options for larger or multigenerational families. The data shows there are more overcrowded renter households in Unincorporated County areas and Orange County than the State (7.4%, 4.2% and 3.6%, respectively). Overcrowding in owner households is similar for all jurisdictions. The data shows that overcrowding disproportionately affects renter households over owner households.

Table 4-25
Households by Overcrowding

Overcrowding and Tenure	Unincorporated Areas	Orange County	California
Owner Households			
Overcrowded	1.6%	1.5%	1.6%
Severe Overcrowding	0.6%	0.6%	0.6%
Renter Households			
Overcrowded	7.4%	4.2%	3.6%
Severe Overcrowding	2.7%	2.6%	2.4%

Source: American Community Survey, 5-Year Estimates, 2019, SCAG Local Housing Metadata, 2018

Table 4-26 display comparative housing stock data for Orange County and California for overcrowded housing units by type. Data for the Unincorporated County areas is not available. A variety of housing stock provides increased opportunity in communities for different sizes and household types. The data shows that half of Orange County housing units are single-family, detached units. The State reports a slightly higher percentage; however, it has a much lower percentage of single-family, attached units than Orange County (7% and 12.3%, respectively). Multifamily housing developments of 10 or more units are of similar percentages for both jurisdictions, with 19.1% for Orange County and 17.5% in California.

Table 4-26
Overcrowded Housing Units by Type

Housing Unit Type	Orange County	California
1-Unit, Detached	50.6%	57.7%
1-Unit, Attached	12.3%	7.0%
2 Units	1.6%	2.4%
3 or 4 Units	6.9%	5.5%
5 to 9 Units	6.7%	6.0%
10 to 19 Units	5.4%	5.2%
20 or More Units	13.7%	12.3%
Mobile Home	2.7%	3.7%
Boat, RV, Van, etc.	0.1%	0.1%
Source: American Community Survey, 5-Year Estimates, 2019.		

According to the 2022 ACS, 3.9% of owner-occupied households in Orange County as a whole are overcrowded including 1% that are severely overcrowded. Orange County has a smaller proportion of overcrowded owner-occupied households compared to Los Angeles County (5.8% overcrowded, 1.7% severely overcrowded), Riverside County (5.1% overcrowded, 1.2% severely overcrowded), and San Bernardino County (5.9% overcrowded, 1.6% severely overcrowded), but a slightly larger proportion than San Diego County (3.6% overcrowded, 0.9% severely overcrowded).

Renter households are significantly more likely to experience overcrowding. In Orange County, 15% of renter households are overcrowded and 6.1% are severely overcrowded. Orange County has a larger population of overcrowded renter households compared to Riverside County (12.4% overcrowded, 6.1% severely overcrowded), San Bernardino County (14% overcrowded, 4.7% severely overcrowded), and San Diego County (10.8% overcrowded, 4.2% severely

overcrowded), but a smaller proportion compared to Los Angeles County (15.6% overcrowded, 7.3% severely overcrowded).

Based on 2012 ACS estimates, the proportion of owner- and renter-occupied households experiencing overcrowding in Orange County has decreased. During the 2012 ACS, it was estimated that 4.1% of owner households and 17% of renter households were overcrowded Countywide.

Table 4-27 shows persons per room by tenure and Unincorporated subarea. A smaller proportion of both owners and renters experience overcrowding in the Unincorporated County areas compared to the County as a whole. Approximately 2.5% of owners in the Unincorporated areas are overcrowded, including 0.7% severely overcrowded, and 9.9% are renters are overcrowded, including 3.8% severely overcrowded. The Unincorporated South County area has a smaller proportion of overcrowded owner households compared to the Central and North areas. North Orange County has the largest proportion of overcrowded renters (16.8%) compared to Central (9.2%) and South OC (5.2%).

Table 4-27
Persons per Room by Unincorporated Subarea and Tenure

	Central OC	North OC	South OC	Unincorporated Areas
Owner-occupied				
Total	45,045	50,514	74364	169923
<1.0 persons per room	96.7%	96.8%	98.5%	97.5%
>1.0 persons per room (overcrowded)	3.3%	3.2%	1.5%	2.5%
>1.5 persons per room (severely overcrowded)	1.2%	0.7%	0.3%	0.7%
Renter-occupied				
Total	29,689	26,021	33,731	89,441
<1.0 persons per room	90.8%	83.2%	94.8%	90.1%
>1.0 persons per room (overcrowded)	9.2%	16.8%	5.2%	9.9%
>1.5 persons per room (severely overcrowded)	2.5%	7.3%	2.4%	3.8%
All households				
Total	74,734	76,535	108,095	259,364
<1.0 persons per room	94.3%	92.2%	97.4%	95.0%
>1.0 persons per room (overcrowded)	5.7%	7.8%	2.6%	5.0%
>1.5 persons per room (severely overcrowded)	1.7%	2.9%	1.0%	1.8%

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Substandard Housing

Table 4-28 below displays housing stock by year built for Unincorporated County areas, Orange County and California. Older housing generally requires more upkeep, regular maintenance, and can cause a cost burden on both renters and homeowners. The data shows a greater percentage of homes built throughout California before 1960 compared to Orange County as a whole. Housing stock in Unincorporated County areas are similar to the State with 24.8% and 28.4%, respectively, of homes built before 1960. Orange County experienced a large housing boom between 1960 and 2000 which resulted in the development of about 70% of the total housing stock. In comparison, 57% of the State's housing stock was built during those 40 years. Overall, increased numbers of older housing can lead to displacement, cost burden, and substandard living conditions.

Table 4-28
Percentage of Housing Units by Year Built

Year Built	Unincorporated Areas	Orange County	California
Built 2014 or later	3.4%	2.7%	1.7%
Built 2010 to 2013		2.0%	1.7%
Built 2000 to 2009	22.1%	8.3%	11.2%
Built 1990 to 1999	14.7%	11.7%	10.9%
Built 1980 to 1989	7.3%	14.9%	15.0%
Built 1970 to 1979	9.7%	23.3%	17.6%
Built 1960 to 1969	18.1%	19.5%	13.4%
Built 1950 to 1959	20.4%	13.0%	13.4%
Built 1940 to 1949	1.9%	2.1%	5.9%
Built 1939 or earlier	2.5%	2.5%	9.1%
Source: American Community Survey, 5-Year Estimates, 2018,2019			

Through the Neighborhood Preservation program, the County identified 49 units in the Unincorporated County areas in need of maintenance or some repair between 2014 to 2021. Substandard units are those in need of repair or replacement. Based on 2019 ACS data for the Unincorporated County areas, approximately 0.34% of housing units (144 units) lack complete plumbing facilities, 1% (424 units) lack complete kitchen facilities, and 1% (424 units) do not have telephone service available. In Orange County, approximately 0.39% of housing units (4,292 units) lack complete plumbing facilities, 1.29% (14,196 units) lack complete kitchen facilities, and 1.95% (21,450 units) do not have telephone service available. Comparatively, in the Los Angeles County Service Area, 5.7% of homes have a basic housing quality problem,

4.4% in Riverside County and 7.2% in San Diego County have a basic housing quality problem – either a moderate or severe physical problem.[24]

The current distribution of the age of homes in Orange County as a whole (**Table 4-29**), also indicates that a majority of homes were built prior to the 1990 Americans with Disabilities Act (ADA), which may result in a lack of accessible homes for those residents experiencing a disability. Comparatively, homes in Unincorporated CDPs are newer – with 42% being built post-1989, compared to only 24.7% built in that same time period in Orange County as a whole. In Orange County as a whole 75.3% of homes pre-date 1989. The data for Unincorporated CDPs shows that in the areas covered by the CDPs the urgency of rehabilitating housing stock is not as acute as in Orange County as a whole. In contrast to the Unincorporated CDPs, Orange County's older housing stock reflects a rapidly gaining need to rehabilitate housing to meet minimum livability and quality requirements, which is a barrier to many homeowners and residents in Orange County who have a lower income or a fixed income.

In general, housing units that are 30 years or older are more likely to need minor rehabilitation or repairs while housing units aged 50 or older are more likely to need major rehabilitation. According to the 2022 ACS (5-year estimates), 35.4% of housing units in Orange County as a whole were built prior to 1970 and are aged 50 or older and 37.4% were built between 1970 and 1990. In comparison, 58.1% of housing units in Los Angeles County were built prior to 1970, 17% in Riverside County, 28.2% in San Bernardino County, and 29.3% in San Diego County. Of housing units built prior to 1990, Orange County has a proportion (72.8%) comparable to San Diego County (70.1%) and San Bernardino County (67%), larger than Riverside County (51.3%) and smaller than Los Angeles County (83.8%).

Table 4-29 shows when housing units were built in Unincorporated County subareas. In the Central and North Unincorporated County areas, the largest proportion of housing units were built between 1960 and 1979, whereas the most housing units in the South Unincorporated County areas were built between 1990 and 2019.

[24] National Center for Healthy Housing, Los Angeles, Riverside and San Diego CA Metrics, 2018. Accessed Online: January 18, 2022. https://nchh.org/tools-and-data/data/state-of-healthy-housing/rankings/location/los-angeles-ca/?data-year=2018

Table 4-29
Year Housing Unit Built by Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated Areas
Built 2020 or later	0.4%	0.1%	1.5%	0.8%
Built 2010 to 2019	6.7%	5.3%	20.6%	12.3%
Built 2000 to 2009	7.7%	7.7%	16.5%	11.5%
Built 1990 to 1999	11.5%	8.2%	23.5%	15.7%
Built 1980 to 1989	13.4%	13.7%	14.8%	14.1%
Built 1970 to 1979	22.7%	25.7%	12.0%	19.0%
Built 1960 to 1969	23.1%	20.8%	5.3%	14.8%
Built 1950 to 1959	12.5%	16.3%	2.5%	9.3%
Built 1940 to 1949	1.1%	1.0%	1.3%	1.2%
Built 1939 or earlier	0.9%	1.1%	2.1%	1.4%
Total households	**78,891**	**79,385**	**118,939**	**277,215**

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Units lacking complete plumbing or kitchen facilities can also be indicators for substandard housing. As shown in **Table 4-30**, North Orange County has the largest proportion of households lacking complete plumbing facilities. However, only 0.3% of households in North Orange County (0.2% of owner-occupied households and 0.4% of renter-occupied households) lack complete plumbing facilities. In the Unincorporated County areas as a whole, 0.2% of both owner-occupied and renter-occupied households lack complete plumbing facilities.

Table 4-31 shows units lacking complete kitchen facilities by tenure and Unincorporated subarea. A larger proportion of households in the Unincorporated County areas (1%) lack complete kitchen facilities compared to plumbing facilities. Like the trend for plumbing facilities, North Orange County has the largest proportion of occupied units lacking complete kitchen facilities (1.6%) compared to Central (0.8%) and South (0.6%) Orange County. Additionally, a larger proportion of renter-occupied households in the Unincorporated County areas lack complete kitchen facilities (2.3%) compared to owner-occupied households (0.3%).

Table 4-30
Units Lacking Complete Plumbing Facilities by Tenure and Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated County Areas
Owner-occupied				
Total households	45,045	50,514	74,364	169,923
Complete plumbing facilities	99.9%	99.8%	99.8%	99.8%
Lacking plumbing facilities	0.1%	0.2%	0.2%	0.2%
Renter-occupied				
Total households	29,689	26,021	33,731	89,441
Complete plumbing facilities	100.0%	99.6%	99.9%	99.8%
Lacking plumbing facilities	0.0%	0.4%	0.1%	0.2%
All households				
Total households	74,734	76,535	108,095	259,364
Complete plumbing facilities	99.9%	99.7%	99.8%	99.8%
Lacking plumbing facilities	0.1%	0.3%	0.2%	0.2%

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

Table 4-31
Units Lacking Complete Kitchen Facilities by Tenure and Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated County Areas
Owner-occupied				
Total households	45,045	50,514	74,364	169,923
Complete plumbing facilities	99.8%	99.8%	99.7%	99.7%
Lacking plumbing facilities	0.2%	0.2%	0.3%	0.3%
Renter-occupied				
Total households	29,689	26,021	33,731	89,441
Complete plumbing facilities	98.3%	95.6%	98.9%	97.7%
Lacking plumbing facilities	1.7%	4.4%	1.1%	2.3%
All households				
Total households	74,734	76,535	108,095	259,364
Complete plumbing facilities	99.2%	98.4%	99.4%	99.0%

Lacking plumbing facilities	0.8%	1.6%	0.6%	1.0%

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Homelessness

People experiencing homelessness are those who do not have a fixed, regular, and adequate overnight residence, or whose overnight residence is a shelter, street, vehicle, or enclosure or structure unfit for habitation. Factors contributing to increases of homelessness may include the following:

- Lack of access to available resources to support stable housing access.
- Spikes in rent increase and lack of tenant protections.
- Housing discrimination.
- Evictions and lack of support or relocation services available.
- Lack of housing affordable to very low, low- and moderate-income persons/households.
- Increases in the number of persons whose incomes fall below the poverty level.
- Reductions in public subsidies to the poor.
- The deinstitutionalization of the mentally ill.

According to the Orange County Homeless Point-in-Time Count, in 2019 there were an estimated 43 unhoused persons in the Unincorporated County areas. The counts for 2020 and 2021 were provided by 2-1-1 Orange County and these reports provide total figures for Orange County as a whole and do not break down the figures for each city and the Unincorporated County areas. In 2020, a total of 3,017 persons experienced homelessness across Orange County, this decreased to 2,441 in 2021.

As mentioned above, there were 2,441 unhoused persons in Orange County in 2021. In comparison, in 2022 Los Angeles County recorded 69,144 unhoused persons (HUD exempted Los Angeles County from a 2021 unsheltered point-in-time count). In 2022, San Diego County counted 8,427 unhoused persons, Riverside County counted 3,316 unhoused persons, and San Bernardino County counted 3,333 unhoused persons. In general, Orange County has a smaller population of persons experiencing homelessness compared to neighboring jurisdictions. While the number of unhoused persons in Orange County is similar to Riverside and San Bernardino, Orange County has a larger overall population, where the unhoused population represents a smaller proportion of the population countywide. The racial and ethnic demographic data for unhoused persons in 2021 is not broken down by jurisdictions; however, for the 2,441 unhoused persons across Orange County accessing shelter, 10% experienced chronic homelessness. Additionally, 77% identified as White, 12% identified as Black, 3% identified as American Indian, less than 1% identified as Native Hawaiian, and 45% identified as Hispanic or Latino. About 295 persons were seniors (age 62 years and older), and about 102 persons were transzonal

aged youth between the ages of 18 to 24, 288 persons were experiencing domestic violence, and 162 persons were veterans. Of the persons living in shelters, 334 experience mental health conditions, 308 persons experience a physical disability, and 297 persons reported substance abuse.[25]

The results from the 2024 Point-in-Time (PIT) count were recently released (as of July 2024). The 2024 PIT count includes geographic breakdowns for populations of persons experiencing homelessness. According to the 2024 count, there were 3,227 persons counted experiencing homelessness in North Orange County (1,646 unsheltered and 1,581 sheltered) including six unsheltered individuals in the Unincorporated North County areas. In Central Orange County, 3,454 persons were counted during the 2024 PIT count (2,036 unsheltered and 1,418 sheltered) including 35 in the Unincorporated County areas (21 unsheltered and 14 sheltered). South Orange County had the smallest share of persons experiencing homelessness, totaling 641 persons (491 unsheltered and 150 sheltered), including only three unsheltered individuals in the Unincorporated County areas. Overall, the Central Unincorporated County area has the largest population of persons experiencing homelessness compared to the North and South Unincorporated County areas. According to the 2023 PIT Count Report, when survey respondents were asked the reason why they chose a particular location, area and/or city to stay in during their time experiencing unsheltered homelessness, over 85% of people gave a reason related to familiarity, relationships or safety. Over half (51.7%) of survey respondents indicated the location chosen was due to its familiarity. The next two most common responses were having a friend of family member in the area (18.8%) and feeling safe in the location (15.2%). Lower income households tend to be at higher risk of becoming homeless.

The North and Central County areas tend to have larger populations of lower income households compared to the South County, in part due to the distribution of housing options available in the given neighborhoods. Lower income households are generally more vulnerable to eviction and/or becoming homeless. As shown below, emergency shelters tend to be more concentrated in the North and Central County areas compared to the South County. In addition to the concentration of emergency shelters, the North and Central County areas have a higher density of services for unhoused individuals. The density of shelters and services may contribute to the concentration of unhoused individuals in the North and Central County. The County coordinates with several service providers to support persons experiencing homelessness. The programs available to the unhoused population are detailed below.

Emergency Shelter Operations and Services. The Program provides safe, temporary shelter services to individuals/families experiencing homelessness with the goal of ensuring a household's experience with homelessness is as brief as possible by offering housing-focused

[25] Orange County Homeless Point-in-Time Count, Orange County Homeless Management Information Systems. 2019, 2020 and 2021. Accessed online: January 19, 2021.

case management and connections to supportive services. The Program follows best practices such as, housing first principles and incorporate evidenced-based approaches such as motivational interviewing, progressive engagement, trauma-informed care, harm reduction and risk management, to address barriers to housing and economic stability.

The Program operates in accordance with the Orange County's Standards of Care for Emergency Shelter Providers (Standards of Care). The Standards of Care is a comprehensive set of administrative, operational, and facility-based standards designed to support the quality and consistency of program operations, evidence-based participant services, core organizational and administrative functions, and facility design and operations.

The following contracted providers assist the County in administering the Emergency Shelter Operations and Service Program:

- Home Aid Orange County's HomeAid Family Care Center serving families experiencing homelessness in the North and Central Service Planning Area
- Pathway's of Hope's New Vista and Via Esperanza serving families experiencing homelessness in the North Service Planning Area
- Illumination Founday's shelter programs serving families in the Central Service Planning Area
- Family Assistance Ministries for FAMily House serving families experiencing homelessness in the South Service Planning Area
- Mercy House – Buena Park Navigation Center serving individuals experiencing homelessness in the North Service Planning Area
- Friendship Shelter's Alternative Sleeping Location serving individuals experiencing homelessness sin the South Service Planning Area
- Covenant House California's Emergency Shelter serving transitional aged youth, countywide
- Interval House for Survivors of Domestic Violence Shelter, countywide

Rapid Rehousing Services. The Rapid Rehousing Services assists households experiencing literal homelessness, either sheltered or those living in a place not meant for human habitation, to transition into permanent housing. The services under the Rapid Rehousing Services Contracts are designed to provide up to 12 months of assistance to households looking to secure permanent housing and housing stabilization services to support housing retention. The Rapid Rehousing Services include the following services at a minimum: intake and assessment, housing-focused case management, financial assistance, housing stabilization and supportive services. Financial assistance supports participants with one-time costs associated with securing housing, including application fees, security deposit, rental arrears, utility assistance, and move-in expenses, as well as ongoing monthly rental assistance payments to access and maintain housing.

The following contracted providers assist the County in administering the Rapid Rehousing Services Program:

- PATH - People Assisting the Homeless for Rapid Rehousing Services for Individuals, providing services countywide
- Covenant House California for Rapid Rehousing Services for Transitional Aged Youth, providing services countywide
- Families Forward for Rapid Rehousing Services for Families, providing services countywide

Regional Coordination of Services. The Regional Care Coordination Services are designed to provide comprehensive care coordination with the goal of assisting individuals to increase their income and secure permanent housing. The Regional Care Coordination Services includes the following service elements:

- Coordinate with O&E to determine areas for targeted outreach and engagement to build relationships that provide care coordination and support in accessing services, mainstream services, homeless service programs and other resources.
- Intake and assessment to determine the history of participation in other homeless service programs and collection of needed or missing information.
- Case management services to ensure proper care coordination to address the needs of participants with a focus on providing support and identifying permanent housing options.
- Disability benefits advocacy to support participants in filing complete and timely applications and appeals, represent individuals at administrative hearings and establish good working relationships with the Social Security Administration services providers as needed to ensure adequate representation utilizing the SSI/SSDI Outreach, Access and Recovery (SOAR) model.
- Housing navigation services to support the participant in identifying available housing units and resources, completing needed forms and applications for housing.
- Coordinate and collaborate with the other components of the System of Care, Orange County Continuum of Care and key stakeholders throughout the SPA to employ a multidisciplinary approach to assist participants in accessing services and/or programs.
- Participate in the Care Plus Program, the System of Care Data Integration System (SOCDIS) and assist in the engagement of high utilizes of County services by gathering consent and expeditiously connecting participants to the correct service or resource cohesively by facilitating transportation.

The following contracted providers assist the County in administering the Regional Care Coordination Services Program:

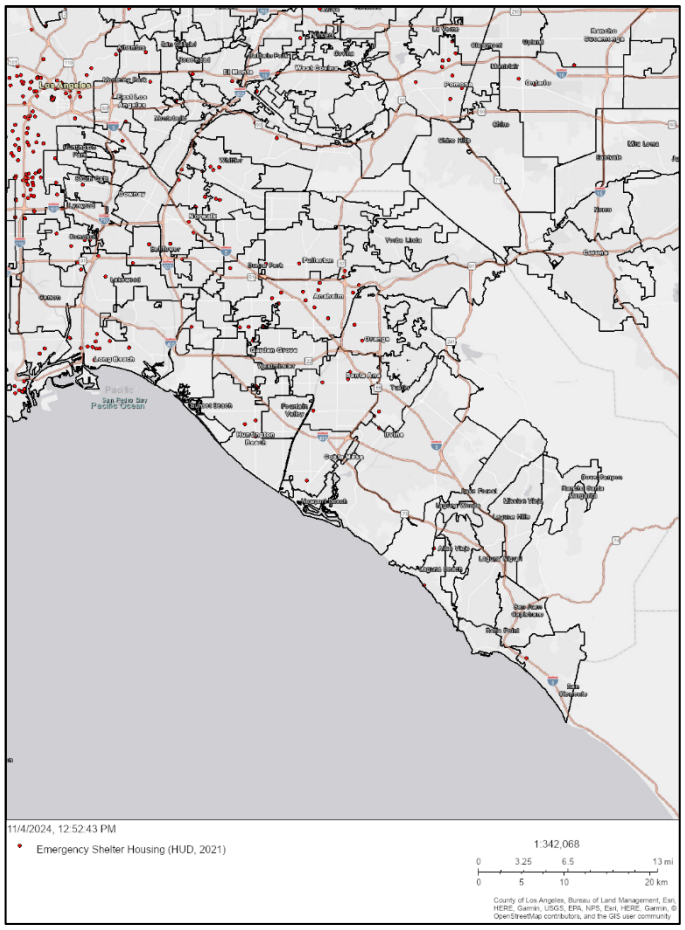
- Volunteers of America Los Angeles (VOALA) providing services in the North Service Planning Area
- PATH, People Assisting the Homeless providing services in the Central Service Planning Area
- Friendship Shelter providing services in the South Service Planning Area

County staff has also identified specific areas where encampments tend to occur. Recently, encampments have been identified along the Santa Ana River in the North County area, Talbert Regional Park in the Central County area, and Beach Boulevard in Garden Grove in the Central County area. Past concentrations of unhoused individuals tended to be more spread out but have been impacted by County clearing resolutions which have provided outreach and services to many unhoused individuals while addressing encampments. The following encampment resolution projects have been implemented in the North and Central County areas in recent years.

Between early January and early April 2018, workers from across the County of Orange focused their efforts on hundreds of homeless individuals who had established encampments along a three-mile stretch of the Santa Ana River, part of the Orange County Flood Control Channel in the Northern area of the County. Through the coordinated work of numerous employees – ranging from outreach workers to park rangers to social workers to Sheriff 's deputies and others – the County successfully connected more than 730 homeless people with motel stays and shelter, removed 404 tons of debris from the area, and reopened the portion of the Santa Ana River Trail for recreational use. The Santa Ana River encampment represented the largest concentration of homeless in Orange County.

In 2021, OC Park Rangers, Costa Mesa Park Rangers, Costa Mesa Police Department, and Costa Mesa Network for Homeless Solutions staff, as well as Costa Mesa Public Works assisted homeless persons living in the Talbert Regional Park. Under coordination with the County, People Assisting the Homeless (PATH) provided services under the Encampment Resolution Funding (ERF) Program to assist those experiencing homelessness in Talbert Regional Park. During FY 2020-21, 129 individuals experiencing homelessness were identified at Talbert Regional Park, and understanding the population does fluctuate, the funding was targeted to provide 60 individuals experiencing homelessness services and resources they need to end their homelessness. The ERF Program also included funding to restore the areas of Talbert Park impacted by those experiencing unsheltered homelessness. Nine individuals who were still encamped at Talbert Park following notice being given to vacate the area, were engaged by outreach personnel and offered access to a shelter bed and food. Individuals were also connected with social services. Many of the individuals residing in the encampment left the area in advance of the joint County and City of Costa Mesa outreach efforts. This effort successfully achieved 75 program enrollments, including 50 individuals placed in public housing and 11 individuals placed in permanent housing.

PATH's scope of work will continue to include care coordination services under the Encampment Resolution Funding (ERF) Program to people experiencing homelessness within the encampment located at Beach Boulevard and Trask Avenue in the City of Garden Grove. PATH will transition the ERF Program team from the City of Costa Mesa working to address the Talbert Regional Park to the City of Garden Grove starting July 1, 2024. This will allow the County and the City to leverage the experience and expertise in working with ERF and addressing homeless encampments. This includes dedicated staffing to engage, build rapport and help ensure connections to services and housing options. PATH will utilize the care coordination model and employ a multidisciplinary approach for service delivery. PATH will leverage regional collaboration between street outreach providers, street medicine programs, and other community-based organizations to provide personalized and comprehensive wrap-around services.



Emergency Shelters (2021)

Displacement

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 developed a neighborhood change database to map neighborhood transformations and identify areas vulnerable to gentrification and displacement. 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. The following lists the criteria used to identify each displacement typology used in **Figure 4-16**:

Low-Income/Susceptible to Displacement.

- Low or mixed low-income tract in 2018.

Ongoing Displacement of Low-Income Households.

- Low or mixed low-income tract in 2018.
- Absolute loss of low-income households, 2000-2018.

At Risk of Gentrification.

- Low or mixed low-income tract in 2018.
- Housing affordable to low or mixed low-income households in 2018.
- Didn't gentrify 1990-2000 or 2000-2018.
- Marginal change in housing costs or Zillow home or rental value increases in the 9^{0t}h percentile between 2012-2018.
- 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.

Early/Ongoing Gentrification.

- Low or mixed low-income tract in 2018.
- Housing affordable to moderate- or mixed-moderate-income households in 2018.
- Increase or rapid increase in housing costs or above regional median. change in Zillow home or rental values between 2-12-2018.
- Gentrified in 1990-2000 or 2000-2018.

Advanced Gentrification.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Marginal change, increase, or rapid increase in housing costs.
- Gentrified in 1990-2000 or 2000-2018.

Stable Moderate/Mixed Income.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.

At Risk of Becoming Exclusive.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Marginal change or increase in housing costs.

Becoming Exclusive.

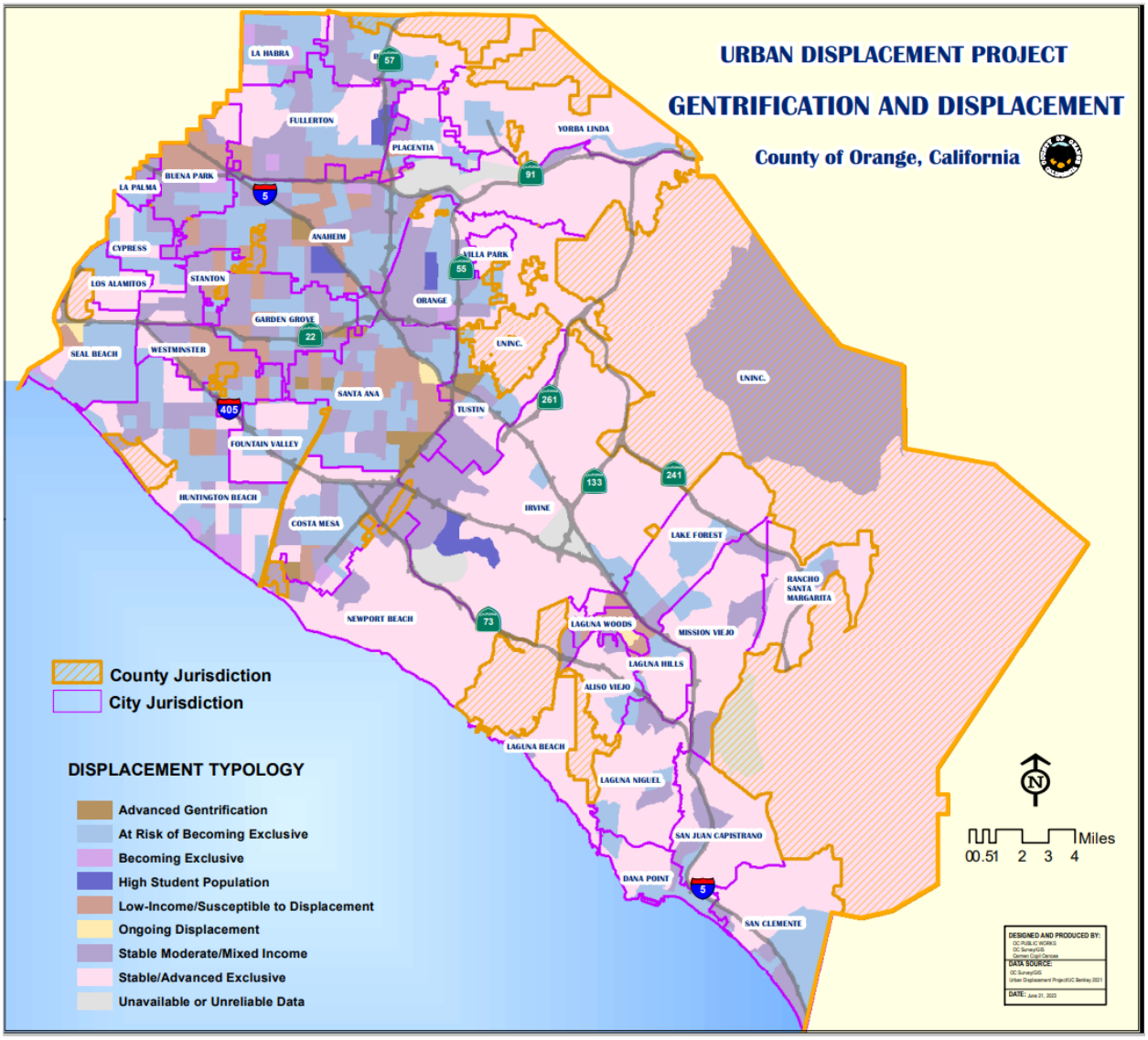
- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Rapid increase in housing costs.
- Absolute loss of low-income households, 2000-2018.
- Declining low-income in-migration rate, 2012-2018.
- Median income higher in 2018 than in 2000.

Stable/Advanced Exclusive.

- High-income tract in 2000 and 2018.
- Affordable to high or mixed high-income households in 2018.
- Marginal change, increase, or rapid increase in housing costs.

As **Figure 4-16** shows, Orange County as a region is made up of a variety of displacement risks with very high levels of exclusivity in the southern region of Orange County and higher occurrences of gentrification and displacement occurring in the central and northern regions of Orange County. It should be noted that **Figure 4-16** also shows a large area of stable/advanced exclusivity in the southeastern region, which is largely made up of undeveloped, mountainous land. However, the region surrounding Santa Ana through the northern portion of Orange County represents areas with lower median incomes and higher likelihood to experience displacement and gentrification.

Figure 4-16
Urban Displacement Project –
Gentrification and Displacement in Orange County



Source: Urban Displacement Project, University of California Berkeley (2021).

Preservation of Assisted Units at Risk of Conversion

Preservation of assisted units is an important goal for assuring that displacement is kept at a minimum. State Housing Element Law requires the analysis of government-assisted housing units that are eligible to convert from low-income housing to market rate housing during the next 10 years due to expiring subsidies, mortgage prepayments, or expiration of affordability restrictions, and identification of programs aimed at their preservation.

Use restrictions, as defined by State law, means any federal, state, or local statute, regulation, ordinance, or contract which as a condition of receipt of any housing assistance, including a rental subsidy, mortgage subsidy, or mortgage insurance, to an assisted housing development, establishes maximum limitations on tenant income as a condition of eligibility for occupancy.

The following section analyzes the potential conversion of assisted housing units to market rate housing.

Status of Covenants of Inventory of Affordable Housing Units Assisted by the County

Affordable covenants help to ensure that certain housing units remain affordable for an extended period of time. Covenants provide lasting affordable options to low and very low-income households in a community. **Table 4-32** below provides a list of 2,771 housing units with affordability covenants that received financial assistance from the County of Orange for their development. Of the units at-risk of converting to market-rate during the planning period, no units are located within the Unincorporated County areas; however, the County has maintained financial interest and support for the units at-risk and will continue to do so throughout the planning period.

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Assisted Units At-Risk of Converting to Market Rate During the Planning Period in Cities					
Canada & Marquita Apartments	143 West Marquita & 133—- 135 W. Canada San Clemente, CA 92672	HOME	12	12	11/4/2026
Village Heights Apartments	1621 Mesa Dr., Newport Beach, CA 92660	OCDA	75	25	4/1/2028
Assisted Units Not At-Risk During the Planning Period					
Pacific Terrace	15000 Pacific St., Midway City	Market-to-Market	98	97	2041*
Walnut Village Apartments	620 S. Walnut Ave., Brea, CA 92821	HOME	47	11	11/27/2036
Bishop Avenue	8142 Bishop Ave., Midway City, CA 92655	HOME	10	10	10/22/2038
Mercy House Scattered Houses	2426 Athens, Orange, CA 92867 9511 S. Mills, Anaheim, CA 92804 2106 W. Niobe, Anaheim, CA 92804 10882 MacMurray, Anaheim, CA 92804	NSP	4	4	2041-2043
Costa Mesa Village	2450 Newport Blvd., Costa Mesa, CA 92627	OCHA	96	95	5/11/2043
Walnut Court & Pixley Arms Apartments	Walnut: 1519 E. Walnut Ave. / Pixley: 537 W. Almond	OCHA	22	22	12/15/2047
Villa Camino Real	601-607-609 La Habra Blvd, Fullerton, CA	OCHA	12	23	5/4/2048
Inn at Woodbridge Apartments	11 Osborne, Irvine, CA 92604	OCHA	116	56	8/9/2049
Park Stanton Place Senior Apartments	7622 Katella Ave., Stanton, CA 90680	OCHA	335	67	12/20/2049
Irvine Inn (SRO)**	2810 Warner Avenue, Irvine, CA 92606	OCHA	192	39	6/23/2050
Woodpark Apartments	22702 Pacific Park Drive, Aliso Viejo, CA	OCHA	128	108	8/8/2050
Arroyo Vista Apartments	26196 Crown Valley Parkway, Mission Viejo, CA 92692	OCHA	156	76	10/21/2050
Fullerton City Lights SRO*	224 E. Commonwealth Ave., Fullerton, CA 92832	OCHA	136	116	4/23/2050
Esencia Norte Apartment Homes***	86 Esencia Dr., Ladera Ranch	MHRB	112	111	8/25/2051
Sendero Bluffs Senior Apartment Homes***	30472 Gateway Place, Rancho Mission Viejo	MHRB	107	106	8/25/2051
Camden Place Senior Apartments	4500 Montecito Drive, La Palma, CA 90623	HOME	35	11	9/22/2052
Plaza Court Apartments	11440 Court Street #4102, Stanton, CA 90680	CDBG	120	25	12/15/2052
El Modena Transitional Shelter	18662-18682 E. Pearl St., Orange, CA 92869	CDBG	6	5	3/25/2053
Vintage Canyon Senior Apartments	855 N. Brea Blvd., Brea, CA 92821	NSP/HOME	105	11	6/10/2053
Midway City SRO**	15161 Jackson St., Midway City, CA	HOME/OCDA	18	9	8/3/2053
Heritage Villas	26836 Oso Pkwy., Mission Viejo, CA 92691	HOME/OC BONDS	143	11/58	8/8/2053
Heritage Place at Tustin	1101 Sycamore Ave., Tustin, CA 92780	OCHA	54	53	11/1/2056
H.O.M.E.S. Inc.- Riley House	466 N Swidler Street, Orange, CA 92869	OPS RESERVE	6	6	7/10/2057
Vintage Shores	366 Camino De Estrella, San Clemente, CA	HOME	122	11	3/26/2058
Westminster Intergenerational	8140 13th St., Westminster, CA 92683	OCDA	86	85	4/5/2058
Linbrook Court	2240 W. Lincoln Ave., Anaheim, CA 928001	HOME	81	80	7/30/2058

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Mendocino at Talega I	123 Calle Amistad, San Clemente, CA 92673	HOME/OCDA	124	11/112	11/24/2058
Mendocino at Talega II	123 Calle Amistad, San Clemente, CA 92673	OCDA	62	62	11/24/2058
California Villas	935 S. Gilbert St., Anaheim, CA 92804	HOME	34	11	12/18/2058
Thomas House	12591 and 12601 Morningside Ave., Garden Grove, CA	CDBG	22	14	2/19/2059
Laurel Glen aka Ladera Ranch	70 Sklar St., Ladera Ranch	OCDA	220	44	2/23/2059
Casa Alegre	2761 W. Ball Rd., Anaheim, CA 92804	HOME	23	22	6/22/2059
Coventry Heights Senior Apartments	7521 Wyoming St., Westminster, CA 92683	GenFund	76	76	6/22/2059
Solara Court Apartments	3335 W. Lincoln Avenue, Anaheim, CA	HOME	132	131	10/24/2059
Jackson Aisle Apartments	15432 Jackson St., Midway City	OCDA	30	29	11/10/2059
Alice Court	450 Glenneyre Street, Laguna Beach, CA 92651	OCDA	27	13	11/19/2059
Escalones Nuevos	150 Escalones, San Clemente, CA	CDBG	6	6	2/24/2060
Casa de la Esperanza	10572 Knott Ave., Stanton, CA 90680	HOME	10	4	8/15/2060
Jasmine At Founders Village	17911 Bushard St, Fountain Valley, CA 92708	SPAHF	156	42	2/10/2061
Montecito Vista Apartment Homes	4000 El Camino Real, Irvine, CA	HOME/OCDA	162	11	6/21/2061
Ability First	14501 Harvard Ave., Irvine, CA 92606	HOME	24	11	9/28/2061
Laguna Canyon	400 Limestone, Irvine, CA 92603	OPS RESERVE	120	57	10/18/2061
Cornerstone Apartments	9541 Ball Rd., Anaheim, CA 92804	HOME/OCDA	48	11/37	4/6/2062
Windrow Apartments	5300 Trabuco Rd, Irvine, CA 92620	OCDA	96	47	6/22/2062
Dorado Senior Apartments	8622 Stanton Ave, Buena Park, CA 90620	HOME/OCDA	150	11/103	9/17/2062
Woodbury Walk Apartments	99 Talisman, Irvine, CA 92620	HOME/OCDA	150	73	5/8/2063
Stonegate I (Anaheim)	9051 W. Katella Ave., Anaheim, CA 92804	HOME/OCDA	37	11	9/9/2064
Stonegate II (Anaheim-Katella)	8911 W. Katella Ave., Anaheim, CA 92804	HOME/OCDA	26	11	9/9/2064
Diamond Aisle	1310 W. Diamond St., Anaheim, CA 92801	MHSA	25	24	12/22/2064
Granite Court	2853 Kelvin Ave., Irvine, CA 92614	HOME/OCDA	71	11/24	2/9/2065
Bonterra Apartment Homes	401 Discovery Lane, Brea, CA 92812	HOME/OCDA	94	82/11	7/1/2065
Doria II—- Stonegate Irvine Families	1000 Crested Bird, Irvine, CA 92614	HOME/OCDA	74	37	1/9/2066
Buena Vista Apartments	16437 E. Buena Vista St., Orange, CA 92865	HOME/OCDA	17	11/6	3/14/2066
Calle del Cerro	1042 Calle Del Cerro #201 1050 Calle Del Cerro #604 1052 Calle Del Cerro #712 1064 Calle Del Cerro #1303	NSP	4	4	6/16/2066
Doria I—- Stonegate Irvine Families	1000 Crested Bird, Irvine, CA 92614	HOME/MHSA	60	29	9/3/2066
Avenida Villas Families	9602 W Ball Rd., Anaheim, CA 92804	HOME/OCDA	29	11/17	11/7/2066
Birch Hills	255 S. Kraemer Blvd., Brea, CA 92821	HOME	114	11/45	6/21/2067
Cotto"s Point	2358 S El Cami Real, San Clemente, CA 92672	HOME	75	27	7/1/2067
8329 Lola Avenue, Stanton, CA 90680	8329 Lola Avenue, Stanton, CA 90680	HOME-SFR/HSA	1	1	8/4/2069
283 Laurel Avenue, Brea, CA, 92821	283 Laurel Avenue, Brea, CA, 92821	HOME-SFR/HSA	1	1	8/13/2069
802 Mathewson Avenue, Placentia, CA 92970	802 Mathewson Avenue, Placentia, CA 92970	HOME-SFR/HSA	1	1	9/23/2069
Oakcrest Heights	22733 Oakcrest Circle, Yorba Linda, CA 92887	HOME/HAS	54	11/3	6/15/2072

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Potters Lane	15171 Jackson St., Midway City	HSA	16	15	11/21/2073
Placentia Veterans Village	1945 East Veterans Way, Placentia, CA 92870	HAS	50	24	12/20/2073

**Pacific Terrace has renewed their Market-to-Market contract which expired on 10/31/2021. The development is now preserved through 2041.*
***The Census does not define SROs as individual units as residents share facilities. However, the County tracts SRO covenants and has therefore included them as part of this analysis.*
**** County owned land as part of the Ranch Affordable Housing Implementation Agreement; once the projects reach the 15 year expiration of the tax credits/bonds the property will be transferred to the County.*
Source: OC Community Resources – Housing & Community Development

Contributing Factors to Disproportionate Housing Needs and Displacement

A number of factors influence the disproportionate housing needs identified above and create a risk of displacement for lower-income households. As **Figure 4-16** demonstrates, a large portion of Orange County as a whole are now established/exclusive areas. Within the Unincorporated County areas, there is a mix, with some pockets that are either established middle-income areas, at risk of becoming exclusive, or are susceptible to or have ongoing displacement. The Unincorporated County areas specifically appear to have a mismatch between the demand for larger affordable units and the available affordable units, as well as (similar to the rest of Orange County) high housing costs. The specific factors which contribute to disproportionate housing needs within the Unincorporated County areas are:

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of affordable housing
- Source of income discrimination

Discussion of Site Inventory Related to People with Protected Characteristics, Lower Incomes, and Opportunity Areas

California Assembly Bill 686 (AB 686) requires that jurisdictions identify candidate housing 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 candidate housing sites in **Table B-8** *Orange County Candidate Housing Site Inventory*, 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.

Selection of candidate housing sites take into consideration access to vital goods, services, and public transportation, and are therefore ideal areas for the County to focus much of its future housing growth. It is anticipated that accessory dwelling unit (ADU) production will occur in the lower density areas of the community.

Approximately 34% of persons from all racial groups in the Unincorporated County areas identify ethnically as Hispanic or Latino. Over 93% of candidate housing sites are located in areas that have equal to or less than 40% of the population identifying as Hispanic or Latino.

The data in **Figures 4-17, 4-20, 4-21, 4-22, 4-23, 4-24, 4-25, 4-26, 4-27, 4-28, 4-29, 4-30** identify the candidate housing sites to accommodate future housing in the County, overlaid on demographics data using AFFH data layers for segregation and integration and access to opportunities provided through HCD data and mapping resources. The data demonstrates that the candidate sites are well located throughout Unincorporated County areas to serve its diverse population.

Candidate Sites and Non-White Population

The distribution of RHNA units by racial/ethnic minority population at the tract level is shown in **Table 4-33** and **Figure 4-17**. As discussed previously, tracts with larger racial/ethnic minority populations tend to be located predominantly in the Central and Northern Orange County areas. Of the sites with units identified to meet the RHNA, 61% are in tracts where 21% to 40% of the population belongs to a racial/ethnic minority group, 13.3% are in tracts where 41% to 60% of the population belongs to a racial/ethnic minority group, 18.8% are in tracts where 61% to 80% of the population belongs to a racial/ethnic minority group, and 6.9% are in tracts where more than 80% of the population belongs to a racial/ethnic minority group. A larger proportion of units allocated towards the lower-income RHNA are in tracts where more than 60% of the population belongs to a racial/ethnic minority group (51.2%) compared to moderate-income units (15.3%) and above-moderate-income units (0.1%).

Table 4-33
Sites Inventory by Racial/Ethnic Minority Population

Racial/Ethnic Minority Population (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
21-40%	1593	32.0%	1476	74.0%	3718	89.8%	6787	61.0%
41-60%	840	16.9%	215	10.8%	420	10.1%	1475	13.3%
61-80%	1928	38.7%	157	7.9%	4	0.1%	2089	18.8%
>80%	622	12.5%	147	7.4%	0	0.0%	769	6.9%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable racial/ethnic minority populations within a single population range (i.e., there are multiple tracts containing RHNA units with racial/ethnic minority populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with racial/ethnic minority populations in this range).

The distribution of RHNA units can also be shown by CDP and Unincorporated tract. Sites identified to meet the County's RHNA are located in the following CDPs or tracts (if not within a specific CDP). CDPs and Unincorporated tracts containing RHNA sites are also shown in **Figure 4-18** and **Figure 4-19**.

- Rossmoor (North Orange County)
- Midway City (Central Orange County)
- North Tustin (Central Orange County)
- Coto de Caza (South Orange County)
- Ladera Ranch (South Orange County)
- Las Flores (South Orange County)
- Rancho Mission Viejo (South Orange County)
- Silverado (South Orange County)
- Trabuco Canyon (South Orange County)
- Tract 218.16 – North Orange County, between Placentia and Yorba Linda
- Tract 218.25 – North Orange County, east of Yorba Linda
- Tract 219.13 – North Orange County, east of Orange and north of Tustin
- Tract 756.04 – North Orange County, east of Orange and north of Tustin
- Tract 762.01 – North Orange County, north of Orange
- Tract 762.02 – North Orange County, north of Orange
- Tract 871.01 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 877.01 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 877.03 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 878.05 – North Orange County, north of Garden Grove and west of Anaheim

- Tract 878.06 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 626.45 – Central Orange County, northeast of Newport Beach and adjacent to UCI
- Tract 992.27 – Central Orange County, between Fountain Valley and Santa Ana
- Tract 320.11 – South Orange County, along northern County border and north of Rancho Santa Margarita

In the North County, tracts 218.25, 219.13, 756.04, 762.01, and 762.02 have the highest concentration of RHNA units. These tracts are in the northeastern corner of the North County area. Tracts in the northern Unincorporated County generally have larger proportions of non-White residents compared to the Central and South County areas. Unincorporated Midway City in the Central County has the largest proportion of RHNA units, totaling 2,043 units (1,907 lower-income, 132 moderate-income, and 4 above-moderate-income). Tracts in Midway City have racial/ethnic minority populations ranging from 76.5% to 97.3%.

In South Orange County, Rancho Mission Viejo (in the Unincorporated County) has the largest proportion of RHNA units (165 lower-income, 1,000 moderate-income, and 3,001 above-moderate-income). Consistent with the trend throughout South Orange County, only 37.5% of persons in the Rancho Mission Viejo tract containing RHNA units belong to a racial or ethnic minority group.

Table 4-34
Sites Inventory by Racial/Ethnic Minority Population – CDP and Unincorporated Tract

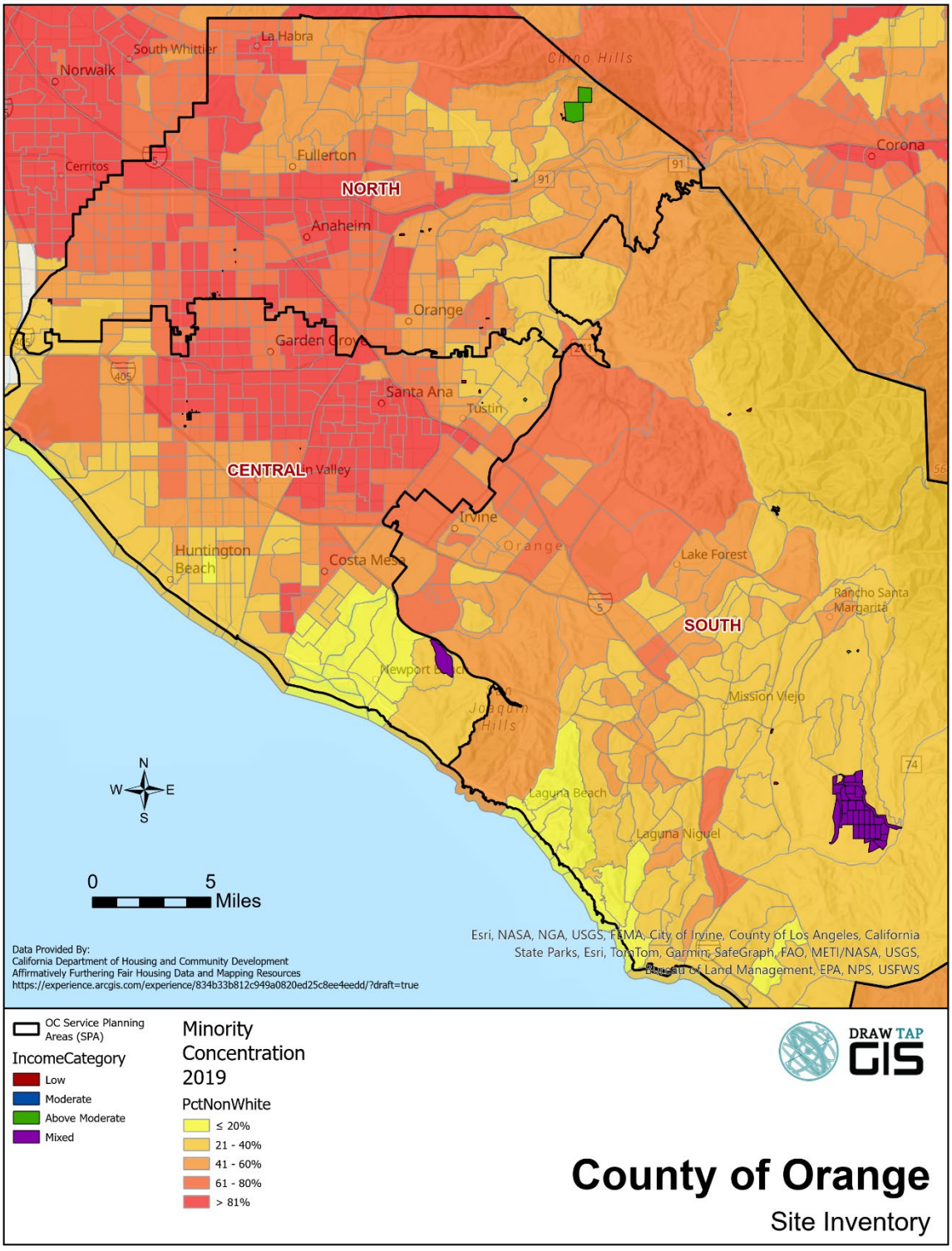
Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% Non-White Pop.
Northern Unincorporated County					
Rossmoor	525	188	0	713	36.4%
Tract 218.16	130	0	44	174	34.2%
Tract 218.25	0	0	420	420	41.0%
Tract 219.13	302	26	0	328	76.1%
Tract 756.04	351	164	0	515	30.3%
Tract 762.01	409	215	0	624	55.6%
Tract 762.02	431	0	0	431	57.4%
Tract 871.01	177	0	0	177	74.7%
Tract 877.01	0	36	0	36	74.0%
Tract 877.03	50	0	0	50	81.2%
Tract 878.05	0	31	0	31	82.5%
Tract 878.06	114	48	0	162	86.0%
Central Unincorporated County					

Table 4-34
Sites Inventory by Racial/Ethnic Minority Population – CDP and Unincorporated Tract

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% Non-White Pop.
Midway City	1907	132	4	2043	76.5% - 87.3%
North Tustin	45	0	63	108	30.0% - 36.2%
Tract 626.45	62	124	432	618	25.2%
Tract 992.27	0	31	0	31	74.3%
Southern Unincorporated County					
Coto de Caza	0	0	113	113	21.5% – 22.1%
Ladera Ranch	30	0	0	30	37.5%
Las Flores	60	0	0	60	37.5%
Rancho Mission Viejo	165	1000	3001	4166	37.5%
Silverado	180	0	0	180	21.8%
Trabuco Canyon	0	0	65	65	28.9%
Tract 320.11	45	0	0	45	21.8%

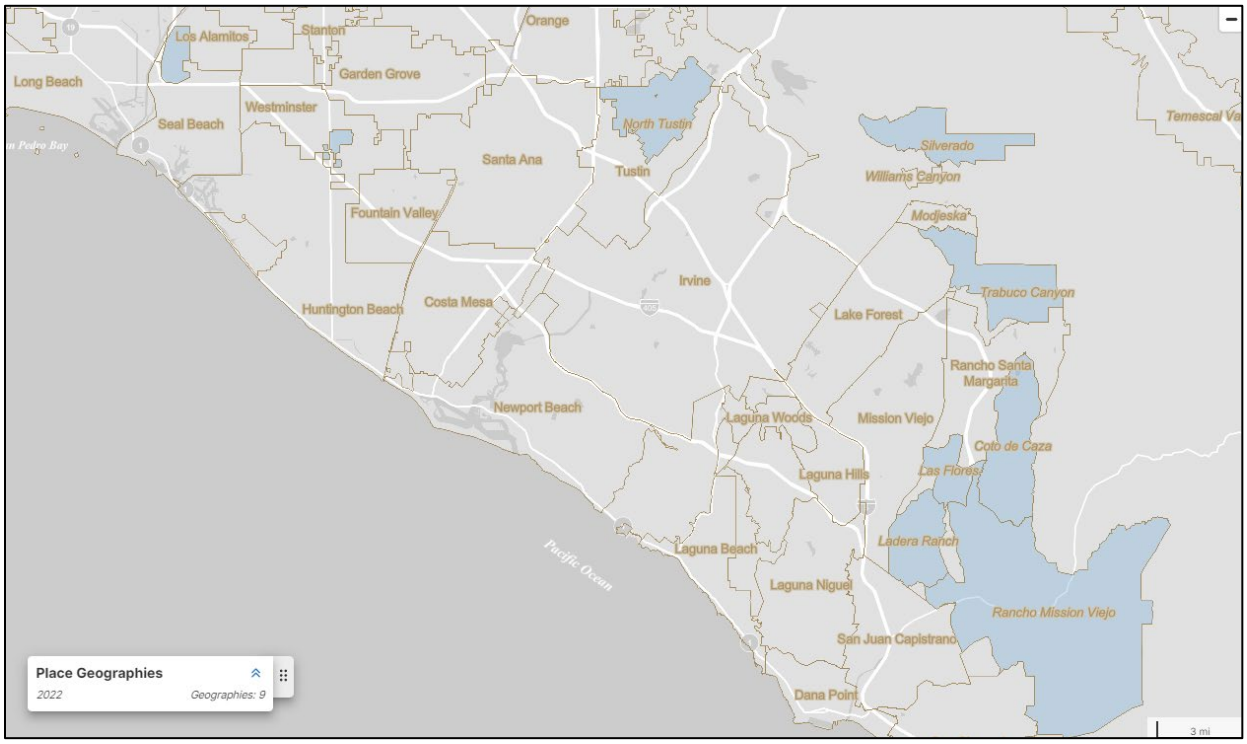
Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).

Figure 4-17
Distribution of RHNA Sites and Racial/Ethnic Minority Population by Tract



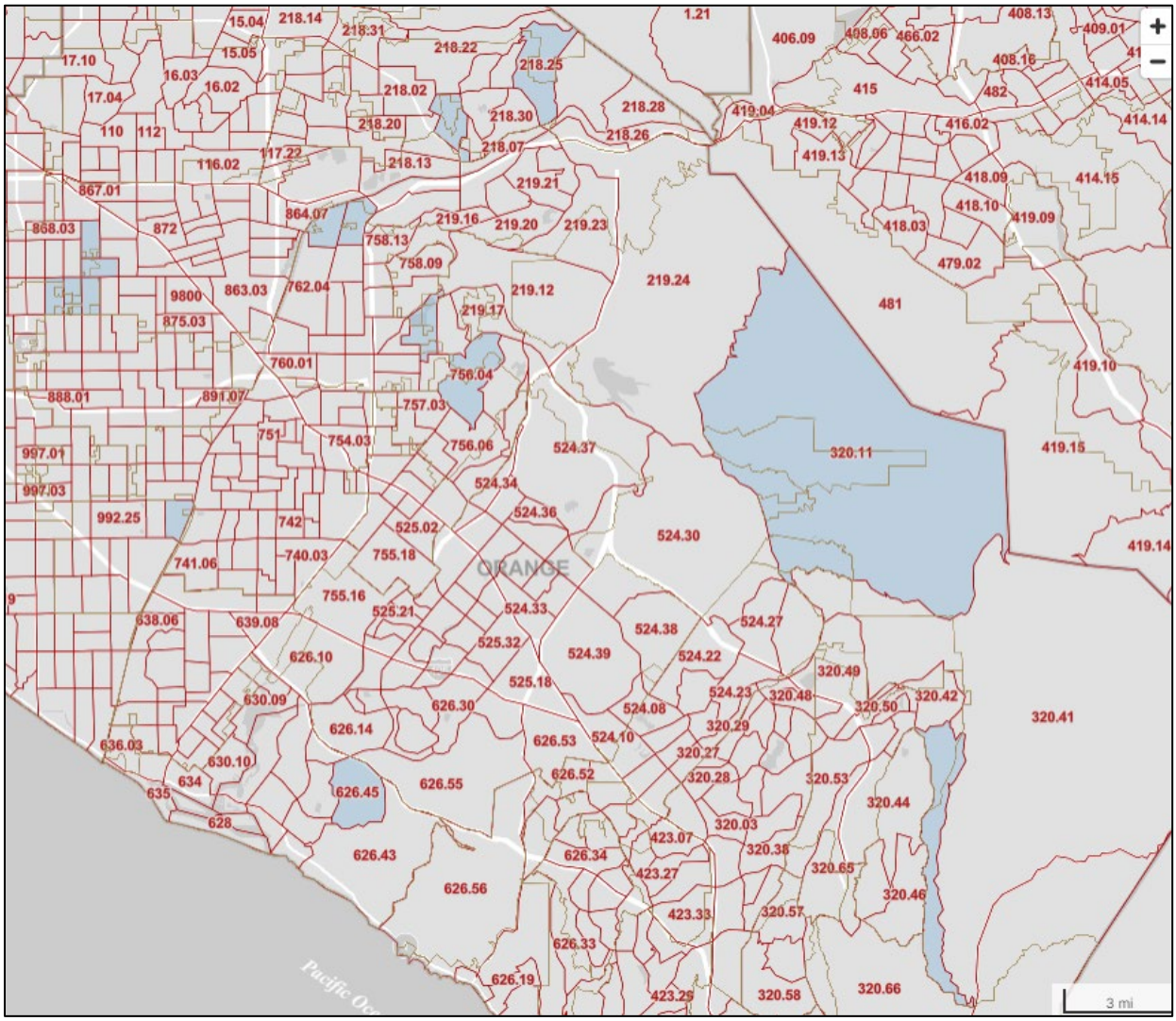
Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).

Figure 4-18
Unincorporated CDPs



Source: US Census Bureau, 2022 American Community Survey.

Figure 4-19
Unincorporated Area Tracts



Source: US Census Bureau, 2022 American Community Survey.

Candidate Sites and Persons with Disabilities

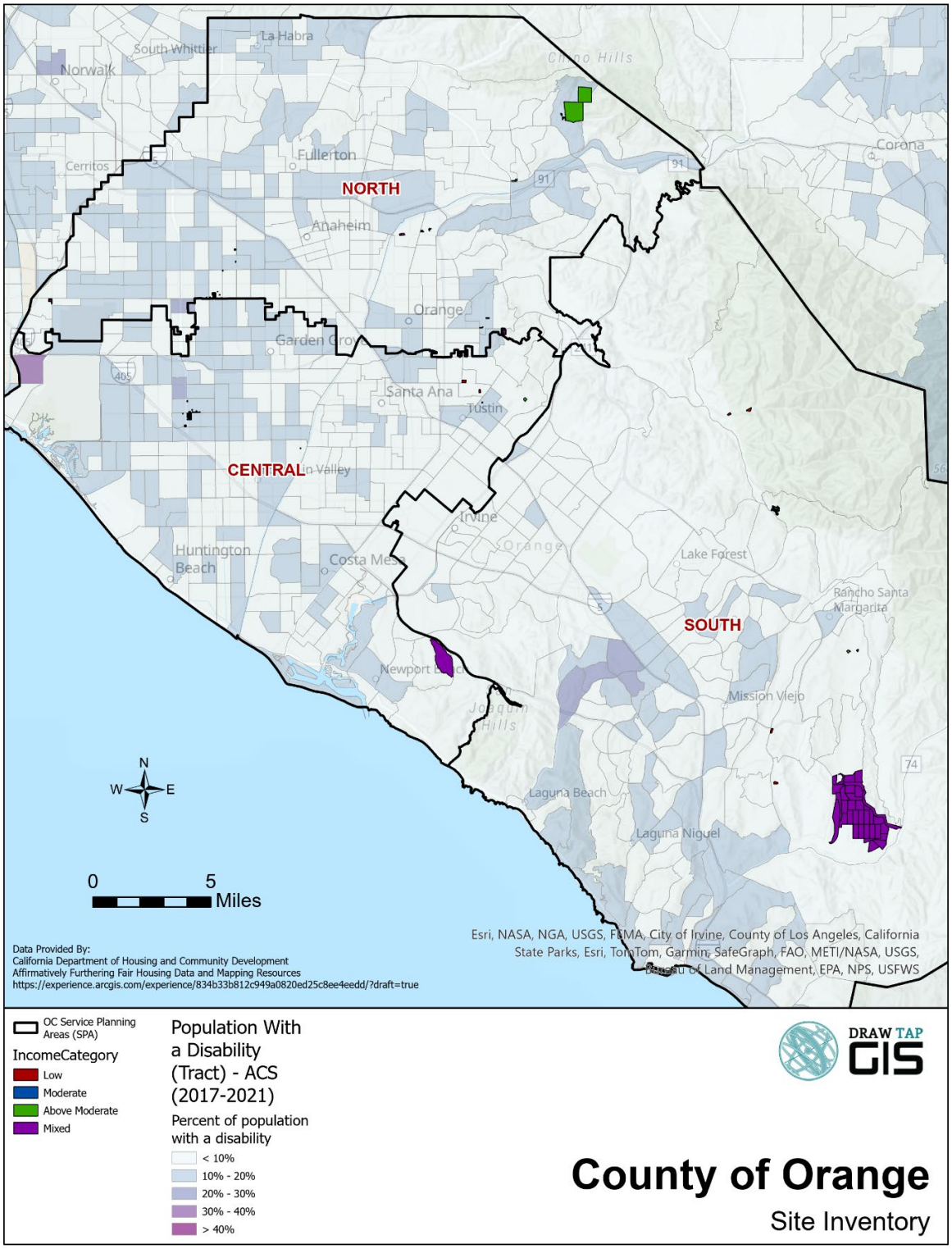
The distribution of RHNA units by populations of persons with disabilities is shown in **Table 4-35** and **Figure 4-20**. Consistent with the countywide trend, there are no RHNA sites located in tracts where more than 20% of the population experiences a disability. Approximately 74% of units are in tracts where less than 10% of the population experiences a disability. The remaining 26% are in tracts where between 10% to 20% of the population experiences a disability. A larger proportion of lower-income RHNA units are in tracts where more than 10% of persons experience a disability (44.3%) compared to moderate-income units (11.3%) and above-moderate-income units (10.5%).

Table 4-35
Sites Inventory by Population of Persons with Disabilities

Persons with Disabilities (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<10%	2774	55.7%	1770	88.7%	3708	89.5%	8252	74.2%
10-20%	2209	44.3%	225	11.3%	434	10.5%	2868	25.8%
20-30%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
30-40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable disabled populations within a single population range (i.e., there are multiple tracts containing RHNA units with disabled populations below 10%. The RHNA units shown are the summation of all units in various Unincorporated tracts with disabled populations in this range).

Figure 4-20
Distribution of RHNA Sites and Persons with Disabilities by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Candidate Sites and Familial Status

The distribution of RHNA units by population of children residing in married couple households is presented in **Table 4-36** and **Figure 4-21**. In general, North and Central Orange County have more tracts with smaller proportions of children in married couple households compared to South Orange County. Nearly all RHNA units are in tracts where more than 60% of children reside in married couple households. Approximately 0.4% of units, totaling 50 units, are in a tract where only 55% of children reside in married couple households. All 50 units located in this tract are allocated towards the lower-income RHNA.

Additionally, more lower-income RHNA units are in tracts where 60% to 80% of children are in married couple households (71.6%) compared to moderate- (22.3%) and above-moderate- (10.5%) income units. The remaining 27.4% of lower-income RHNA units, 77.7% of moderate-income units, and 89.5% of above-moderate-income units are in tracts where more than 80% of children live in married-couple households.

RHNA units and sites are shown by population of children residing in single-parent female-headed households in **Table 4-37** and **Figure 4-22**. Less than 40% of children live in female-headed households in most Orange County tracts. There are no RHNA sites located in tracts where more than 40% of children are in single-parent female-headed households. However, a larger proportion of moderate- (93.4%) and above-moderate- (99.7%) income units are in tracts where less than 20% of children reside in female-headed households compared to lower-income units (65.4%). The remaining 34.6% of lower-income units, 6.6% of moderate-income units, and 0.3% of above-moderate-income units are in tracts where 20% to 40% of children reside in female-headed households.

Table 4-36
Sites Inventory by Children in Married Couple Households

Children in Married Couple Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
40-60%	50	1.0%	0	0.0%	0	0.0%	50	0.4%
60-80%	3567	71.6%	444	22.3%	434	10.5%	4445	40.0%
>80%	1366	27.4%	1551	77.7%	3708	89.5%	6625	59.6%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

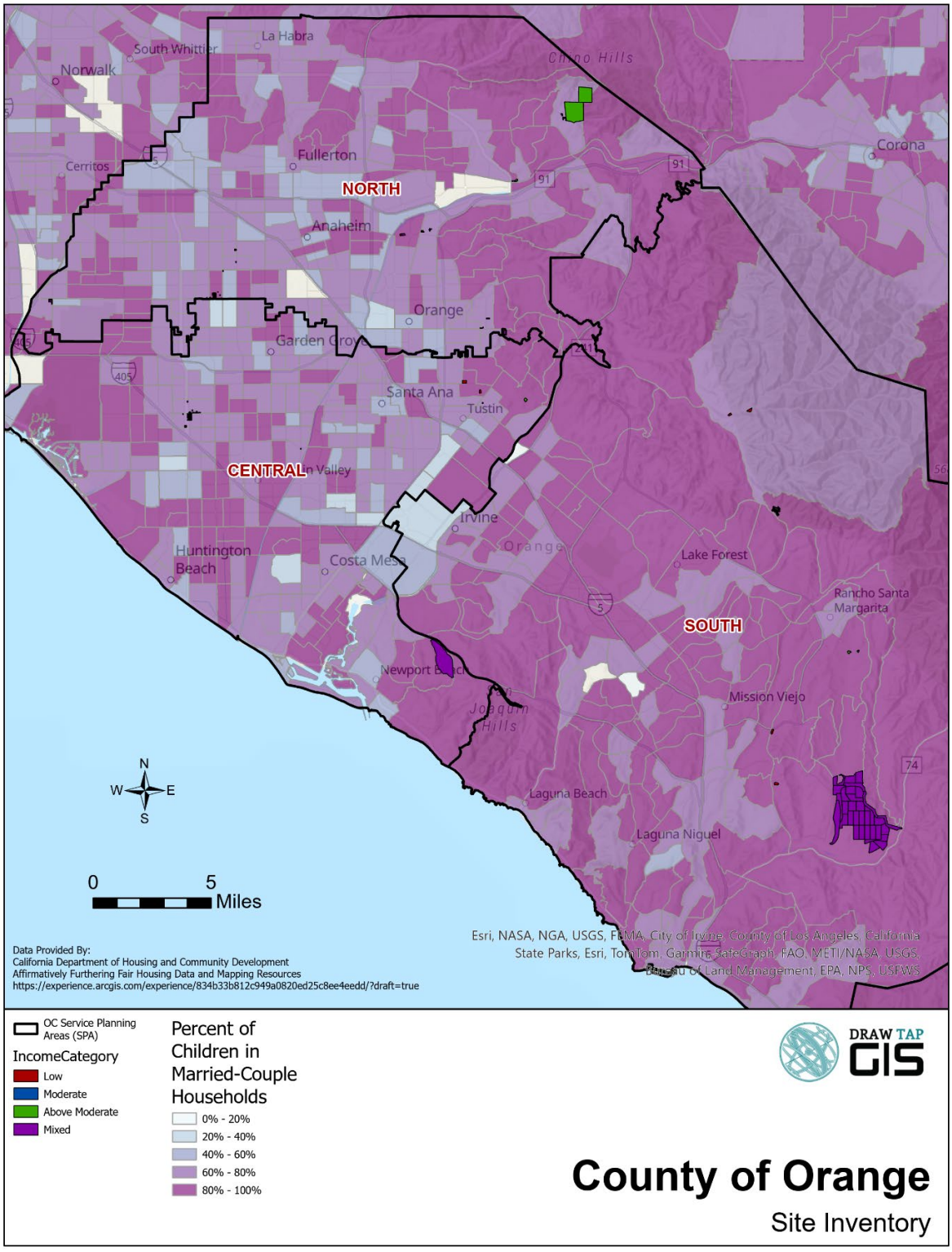
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable populations of children in married couple households within a single population range (i.e., there are multiple tracts containing RHNA units with populations of children in married couple households below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with populations of children in married couple households in this range).

Table 4-37
Sites Inventory by Children in Female-Headed Households

Children in Female-Headed Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	3259	65.4%	1864	93.4%	4128	99.7%	9251	83.2%
20-40%	1724	34.6%	131	6.6%	14	0.3%	1869	16.8%
40-60%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
60-80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

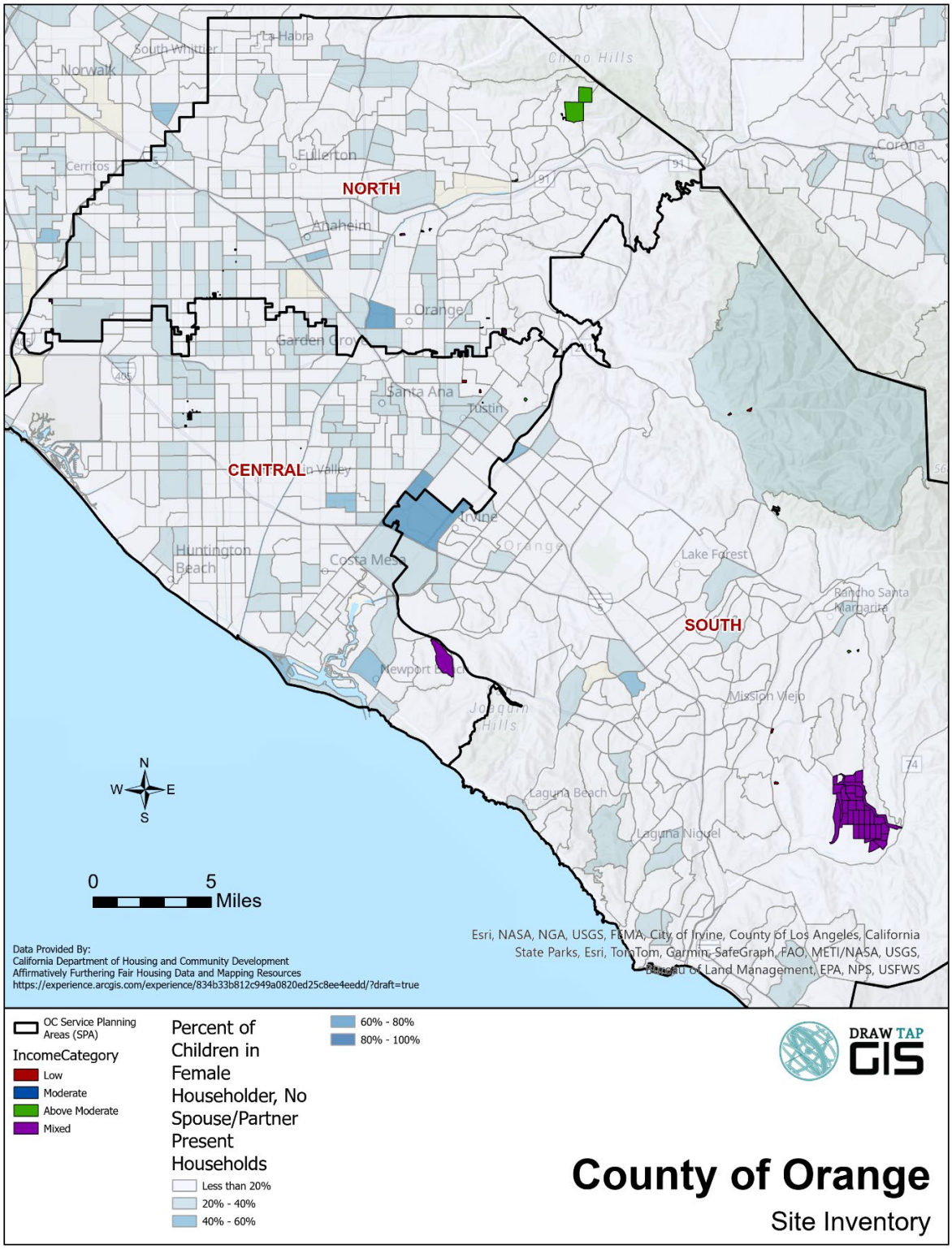
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable populations of children in female-headed households within a single population range (i.e., there are multiple tracts containing RHNA units with populations of children in female-headed households below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with populations of children in female-headed households in this range).

Figure 4-21
Distribution of RHNA Sites and Children in Married Couple Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Figure 4-22
Distribution of RHNA Sites and Children in Female-Headed Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Candidate Sites and Low- and Moderate- Income

The distribution of RHNA units by LMI household population is shown in **Table 4-38** and **Figure 4-23**. As shown in **Figure 4-23**, block groups with larger LMI household populations are generally more concentrated in the North and Central Orange County areas. Of the units selected to meet the RHNA, 61.8% are in block groups that are considered LMI areas, where more than 50% of households have low or moderate incomes. A larger proportion of units allocated towards the above-moderate-income RHNA are in LMI areas (72.5%) compared to moderate-income units (65.4%) and lower-income units (51.5%).

Table 4-38
Sites Inventory by Population of LMI Households

LMI Households (Block Group)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<25%	1399	28.1%	476	23.9%	1002	24.2%	2877	25.9%
25-50%	1016	20.4%	215	10.8%	135	3.3%	1366	12.3%
50-75%	2047	41.1%	1179	59.1%	3005	72.5%	6231	56.0%
75-100%	521	10.5%	125	6.3%	0	0.0%	646	5.8%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).
Note: Population is based on the block group-level data where each site is located. Block groups with RHNA sites have LMI household populations within a single population range (i.e., there are multiple block groups containing RHNA units with LMI household populations of below 25%. The RHNA units shown are the summation of all units in various Unincorporated block groups with LMI household populations in this range).

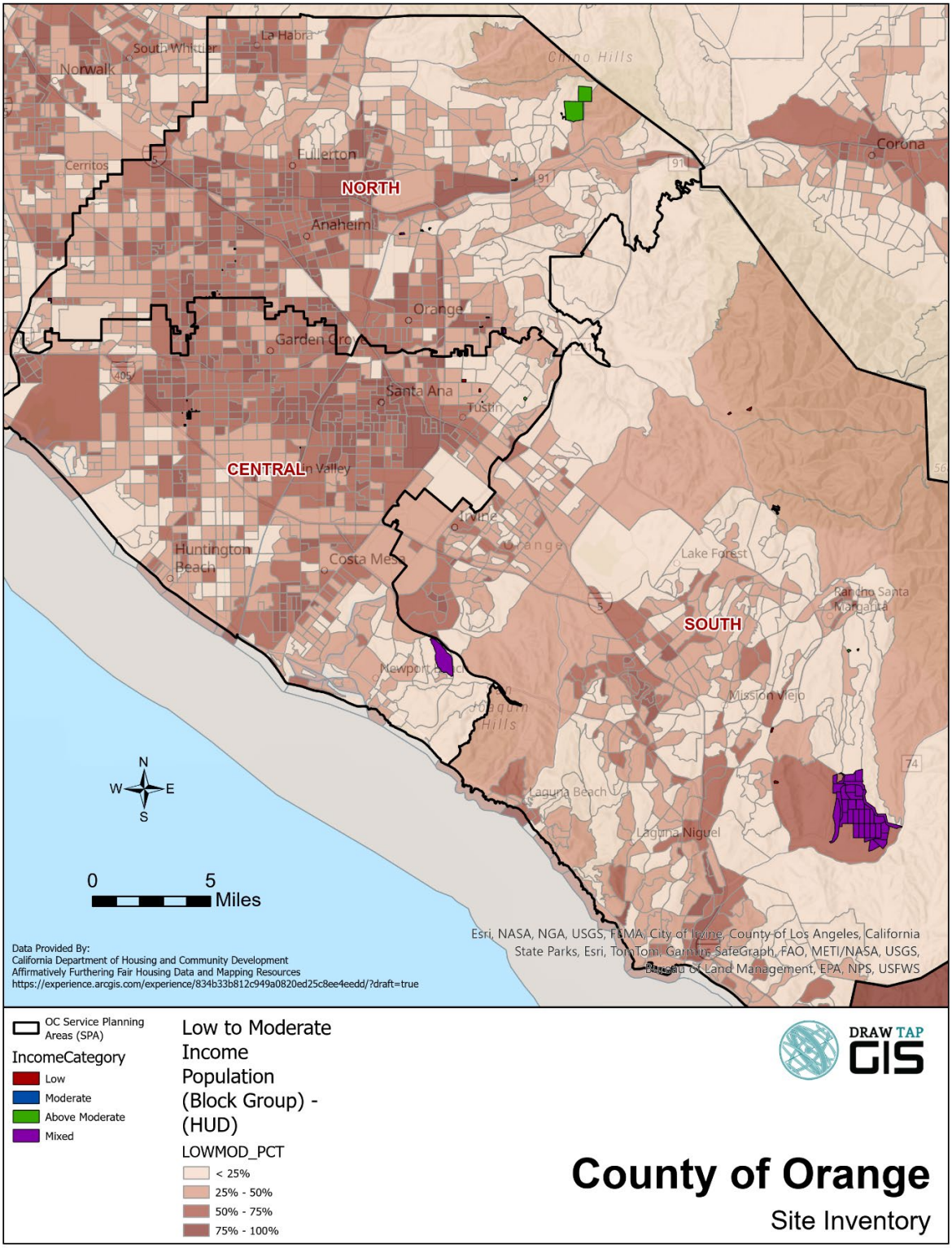
The distribution of RHNA units by CDP or Unincorporated County tract is presented in **Table 4-39**. As discussed above, in the North County, tracts 218.25, 219.13, 756.04, 762.01, and 762.02 have the largest concentrations RHNA units. These tracts have LMI household populations of 17.2%, 79.2%, 9.5%, 49.2%, and 20.6%, respectively. These tracts, with the exception of tract 219.13, generally have lower LMI populations compared to other areas in the North County. Tract 219.13 is located north of the City of Orange. There are 2,043 RHNA units identified in Midway City in the Central County area. Tracts in Unincorporated Midway City have LMI populations ranging from 62% to 83.3%. LMI populations in Unincorporated Midway City are higher than other CDPs/tracts in the Central Unincorporated County area containing RHNA units. Unincorporated Rancho Mission Viejo in the South Unincorporated County area has the largest proportion of RHNA units and an LMI population of 60%.

Table 4-39
Sites Inventory by Population of LMI Households – CDP and Unincorporated Tract

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% LMI Households
Northern Unincorporated County					
Rossmoor	525	188	0	713	21.7%
Tract 218.16	130	0	44	174	42.6%
Tract 218.25	0	0	420	420	17.2%
Tract 219.13	302	26	0	328	79.2%
Tract 756.04	351	164	0	515	9.5%
Tract 762.01	409	215	0	624	49.2%
Tract 762.02	431	0	0	431	20.6%
Tract 871.01	177	0	0	177	32.1%
Tract 877.01	0	36	0	36	71.0%
Tract 877.03	50	0	0	50	72.7%
Tract 878.05	0	31	0	31	74.5%
Tract 878.06	114	48	0	162	71.8%
Central Unincorporated County					
Midway City	1907	132	4	2043	62.0% - 83.3%
North Tustin	45	0	63	108	20.5% - 44.3%
Tract 626.45	62	124	432	618	6.9%
Tract 992.27	0	31	0	31	79.6%
Southern Unincorporated County					
Coto de Caza	0	0	113	113	7.4% - 24.2%
Ladera Ranch	30	0	0	30	60.0%
Las Flores	60	0	0	60	35.6%
Rancho Mission Viejo	165	1000	3001	4166	60.0%
Silverado	180	0	0	180	46.0%
Trabuco Canyon	0	0	65	65	26.5%
Tract 320.11	45	0	0	45	46.0%

Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).

Figure 4-23
Distribution of RHNA Sites and LMI Household Populations by Block Group



Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).

Candidate Sites and R/ECAPs

There are a few Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) within the center of Orange County; however, the proposed candidate sites do not fall within any of the identified R/ECAPs and none are located in any Unincorporated County areas. There are also no RHNA units located in any TCAC areas of high segregation and poverty.

Candidate Sites and RCAAs

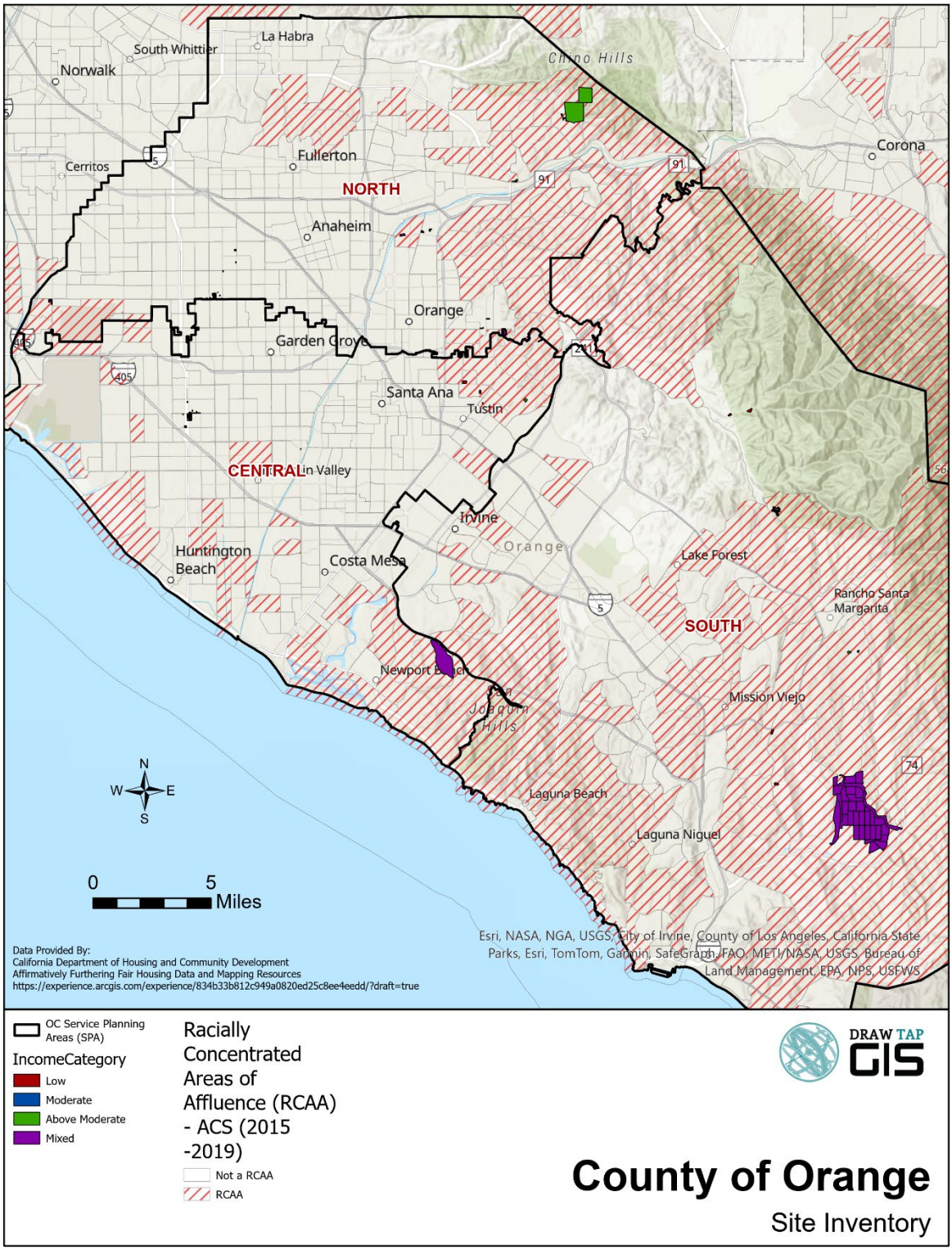
Table 4-40 and **Figure 4-24** show the distribution of units identified to meet the RHNA by RCAAs. As shown in **Figure 4-24**, a large proportion of Orange County, especially South Orange County, is considered an RCAA. Of the units identified to meet the RHNA, 68.4% are in RCAA tracts, including 35.7% of lower-income units, 84.8% of moderate-income units, and 99.9% of above-moderate-income units.

Table 4-40
Sites Inventory by RCAAs

RCAAs (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
RCAA	1777	35.7%	1691	84.8%	4138	99.9%	7606	68.4%
Not an RCAA	3206	64.3%	304	15.2%	4	0.1%	3514	31.6%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on HCD 2019 RCAAs).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified as RCAAs (i.e., there are multiple tracts containing RHNA units that are RCAAs. The RHNA units shown are the summation of all units in various Unincorporated tracts that are RCAAs).

Figure 4-24
Sites Inventory and RCAAs



Source: HCD AFFH Data Viewer 2.0 (based on HCD 2019 RCAAs).

Candidate Sites and TCAC/HCD Opportunity AreasMost of South Orange County, the coastal areas of Central Orange County, and the northern areas of North Orange County are considered the highest resource areas. As shown in **Table 4-41** and **Figure 4-25**, there are no RHNA units in low resource areas or areas of high segregation and poverty. Most RHNA units (64.8%) are in highest resource tracts, followed by high resource tracts (26.1%), and moderate resource tracts (9.1%). A larger proportion of moderate- and above-moderate-income units are in highest resource tracts (74% and 99.9%, respectively), compared to lower-income units (32%). Conversely, a larger proportion of units identified to meet the lower-income RHNA are in moderate resource tracts (16%) compared to moderate-income units (10.7%) and above-moderate-income units (0%).

Table 4-41
Sites Inventory by TCAC Opportunity Area

TCAC Opportunity Area Category (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
Highest Resource	1593	32.0%	1476	74.0%	4138	99.9%	7207	64.8%
High Resource	2591	52.0%	305	15.3%	4	0.1%	2900	26.1%
Moderate Resource	799	16.0%	214	10.7%	0	0.0%	1013	9.1%
Low Resource	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Area of High Segregation and Poverty	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified by a TCAC opportunity area category (i.e., there are multiple tracts containing RHNA units that are Highest Resource Areas. The RHNA units shown are the summation of all units in various Unincorporated tracts that are Highest Resource Areas).

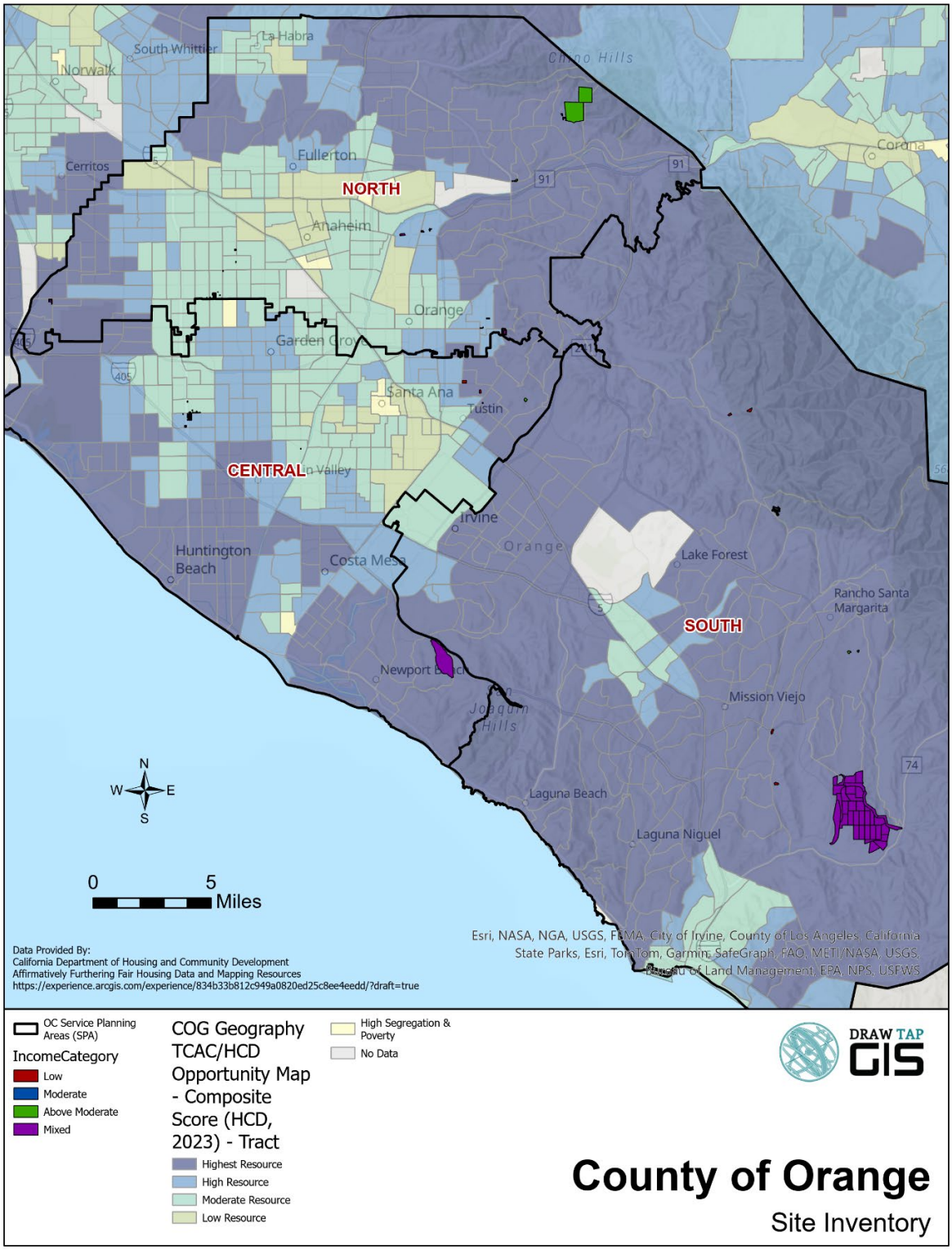
The distribution of RHNA units by TCAC Opportunity Area and CDP/tract is presented in **Table 4-42**. In the North County, opportunities to accommodate more than 500 RHNA units have been identified in Rossmoor, tract 756.04, and tract 762.01. These are all highest or high resource areas. Only 456 of the total 2,800 RHNA units in the North County (16.3%) are in moderate resource areas. There are no RHNA units in the North County in low resource areas or areas of high segregation and poverty. There are also no RHNA units in low resource areas or areas of high segregation and poverty in the Central or South County areas. Sites accommodating 2,043 units have been identified in Midway City (Central County), which is comprised of moderate and high resource tracts. In the South County, all RHNA units are in highest resource areas.

Table 4-42
Sites Inventory by TCAC Opportunity Area – CDPs and Unincorporated Tracts

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	TCAC Opportunity Area
Northern Unincorporated County					
Rossmoor	525	188	0	713	Highest Resource
Tract 218.16	130	0	44	174	Highest Resource
Tract 218.25	0	0	420	420	Highest Resource
Tract 219.13	302	26	0	328	High Resource
Tract 756.04	351	164	0	515	Highest Resource
Tract 762.01	409	215	0	624	High Resource
Tract 762.02	431	0	0	431	High Resource
Tract 871.01	177	0	0	177	Moderate Resource
Tract 877.01	0	36	0	36	Moderate Resource
Tract 877.03	50	0	0	50	Moderate Resource
Tract 878.05	0	31	0	31	Moderate Resource
Tract 878.06	114	48	0	162	Moderate Resource
Central Unincorporated County					
Midway City	1907	132	4	2043	Moderate/High Resource
North Tustin	45	0	63	108	Highest Resource
Tract 626.45	62	124	432	618	Highest Resource
Tract 992.27	0	31	0	31	Moderate Resource
Southern Unincorporated County					
Coto de Caza	0	0	113	113	Highest Resource
Ladera Ranch	30	0	0	30	Highest Resource
Las Flores	60	0	0	60	Highest Resource
Rancho Mission Viejo	165	1000	3001	4166	Highest Resource
Silverado	180	0	0	180	Highest Resource
Trabuco Canyon	0	0	65	65	Highest Resource
Tract 320.11	45	0	0	45	Highest Resource

Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).

Figure 4-25
Distribution of RHNA Sites and TCAC Opportunity Area by Tract



Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).

Candidate Sites and CalEnviroScreen

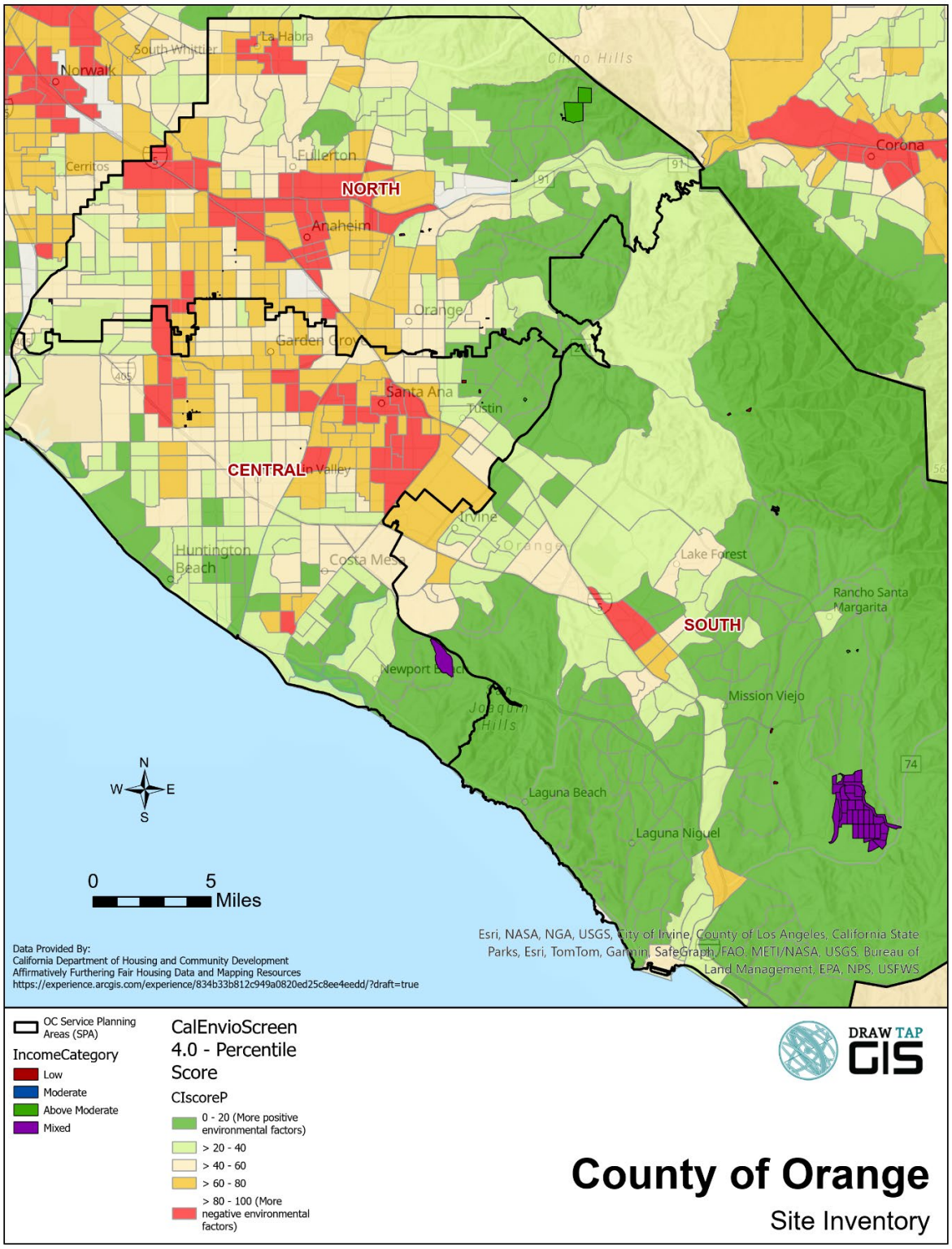
CalEnviroScreen 4.0 percentile scores by tract and the sites selected to meet the RHNA are presented in **Table 4-43** and **Figure 4-26**. South Orange County generally has superior environmental outcomes based on CalEnviroScreen 4.0 score compared to the Central and North areas. Of all units identified to meet the RHNA, 58.4% scored in the 20th percentile or lower (best scores), 12% scored in the 20th to 40th percentile range, 9% scored in the 40th to 60th percentile range, and 20.6% scored in the 60th to 80th percentile range. There are no RHNA units located in tracts scoring in the 80th percentile or above (worst scores). However, a larger proportion of lower-income units (41.6%) are in tracts scoring in the 60th percentile or higher compared to moderate- (10.6%) and above-moderate- (0.1%) units. Nearly all units identified to meet the above-moderate-income RHNA scored within the 20th percentile range (best scores) compared to only 21.4% of lower-income units and 64.6% of moderate-income units.

Table 4-43
Sites Inventory by CalEnviroScreen Percentile Score

CalEnviroScreen Percentile Score (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
0-20	1068	21.4%	1288	64.6%	4138	99.9%	6494	58.4%
20-40	934	18.7%	403	20.2%	0	0.0%	1337	12.0%
40-60	910	18.3%	93	4.7%	0	0.0%	1003	9.0%
60-80	2071	41.6%	211	10.6%	4	0.1%	2286	20.6%
80-100	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on OEHHA CalEnviroScreen, 2021).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable CalEnviroScreen scores within a single score range (i.e., there are multiple tracts containing RHNA units with CalEnviroScreen scores below 20. The RHNA units shown are the summation of all units in various Unincorporated tracts with CalEnviroScreen scores in this range).

Figure 4-26
Distribution of RHNA Sites and CalEnviroScreen Score by Tract



Source: HCD AFFH Data Viewer 2.0 (based on OEHHA CalEnviroScreen, 2021).

Candidate Sites and Cost Burden

Overpayment by homeowners by tract and the sites inventory are shown in **Table 4-44** and **Figure 4-27**. There are no RHNA units located in tracts where more than 60% of owners are cost burdened. The largest proportion of RHNA units (84.2%) are in tracts where between 20% and 40% of owners are cost burdened. There are more lower-income RHNA units (24%) in tracts where between 40% and 60% of owners are cost burdened compared to moderate- (15.6%) and above-moderate-income units (1.8%). However, an additional 177 lower-income units (3.6% of all lower-income units) are in tracts where less than 20% of owners are cost burdened. There are no moderate- or above-moderate-income units in tracts with populations of cost burdened owners in this range.

The sites inventory and burdened renter households are presented in **Table 4-45** and **Figure 4-28**. In general, cost burdened renters are more prevalent in tracts in North and Central Orange County compared to South Orange County. Nearly half of RHNA units (44.9%) are in tracts where between 60% and 80% of renters overpay for housing. A smaller proportion of lower-income units are in tracts with populations of cost burdened renters in this range (14.2%) compared to moderate-income units (64.1%) and above-moderate-income units (72.5%). Another 36.5% of RHNA units are in tracts where 40% to 60% of renters are cost burdened and 17.8% are in tracts where 20% to 40% of renters are cost burdened. There are an additional 102 above- moderate-income units in tracts where less than 20% of renters overpay for housing. There are no RHNA units are tracts where more than 80% of renters are cost burdened.

Table 4-44
Sites Inventory by Cost Burdened Owners

Cost Burdened Owners (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	177	3.6%	0	0.0%	0	0.0%	177	1.6%
20-40%	3608	72.4%	1684	84.4%	4067	98.2%	9359	84.2%
40-60%	1198	24.0%	311	15.6%	75	1.8%	1584	14.2%
60-80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

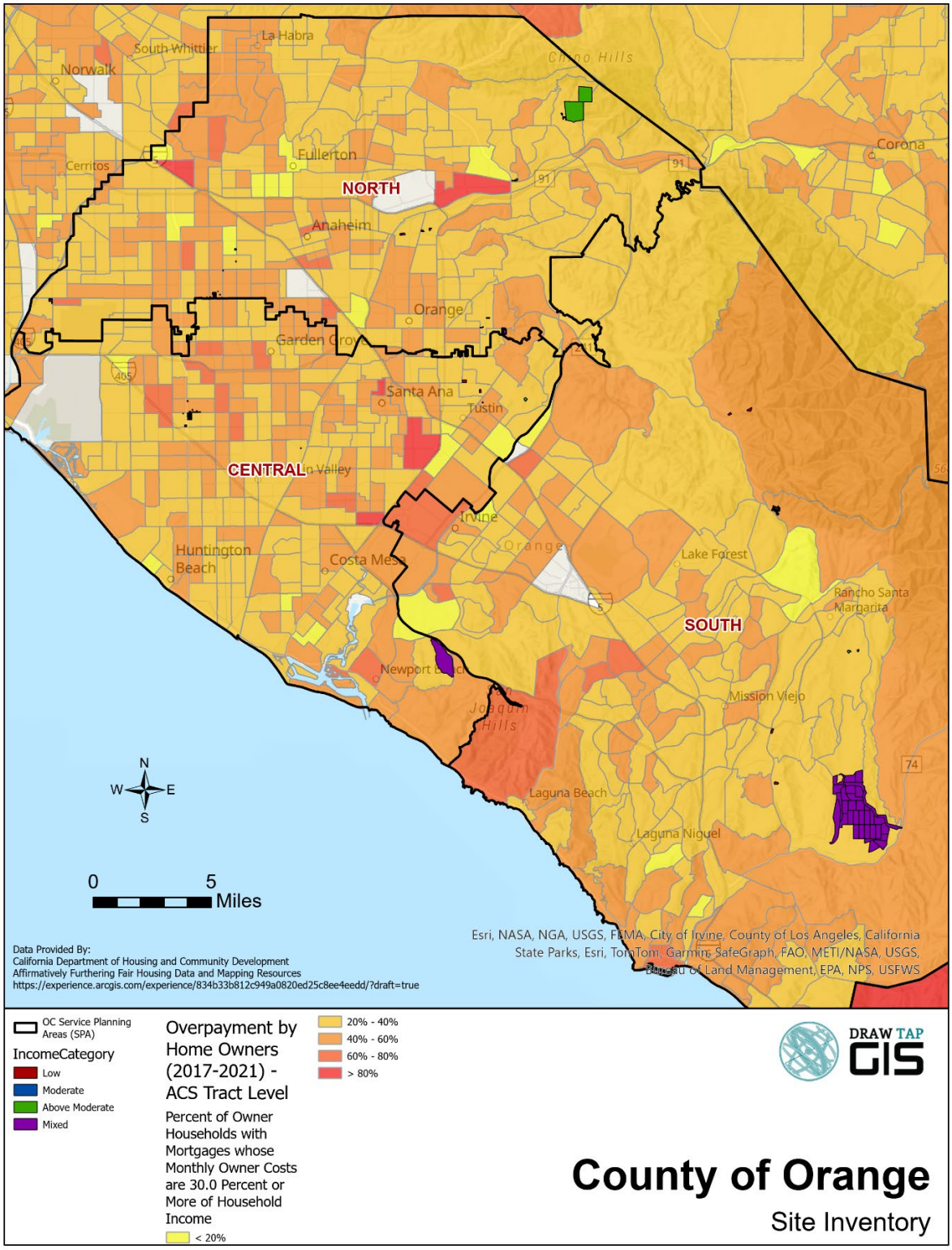
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable cost burdened owner populations within a single population range (i.e., there are multiple tracts containing RHNA units with cost burdened owner populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with cost burdened owner populations in this range).

Table 4-45
Sites Inventory by Cost Burdened Renters

Cost Burdened Renters (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	102	2.5%	102	0.9%
20-40%	1047	21.0%	312	15.6%	615	14.8%	1974	17.8%
40-60%	3226	64.7%	404	20.3%	424	10.2%	4054	36.5%
60-80%	710	14.2%	1279	64.1%	3001	72.5%	4990	44.9%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

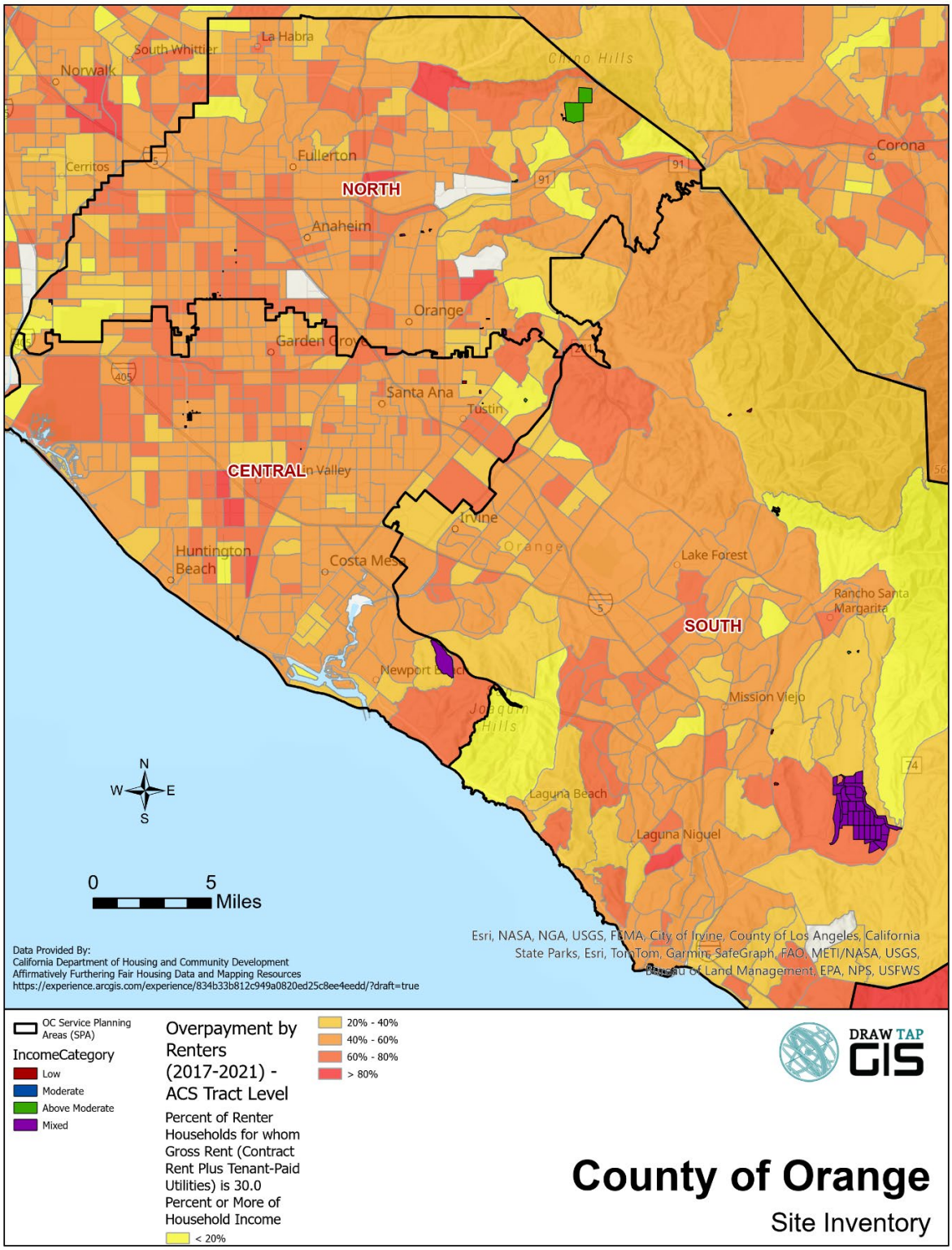
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable cost burdened renter populations within a single population range (i.e., there are multiple tracts containing RHNA units with cost burdened renter populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with cost burdened renter populations in this range).

Figure 4-27
Distribution of RHNA Sites and Cost Burdened Owners by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Figure 4-28
Distribution of RHNA Sites and Cost Burdened Renters by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Candidate Sites and Overcrowding

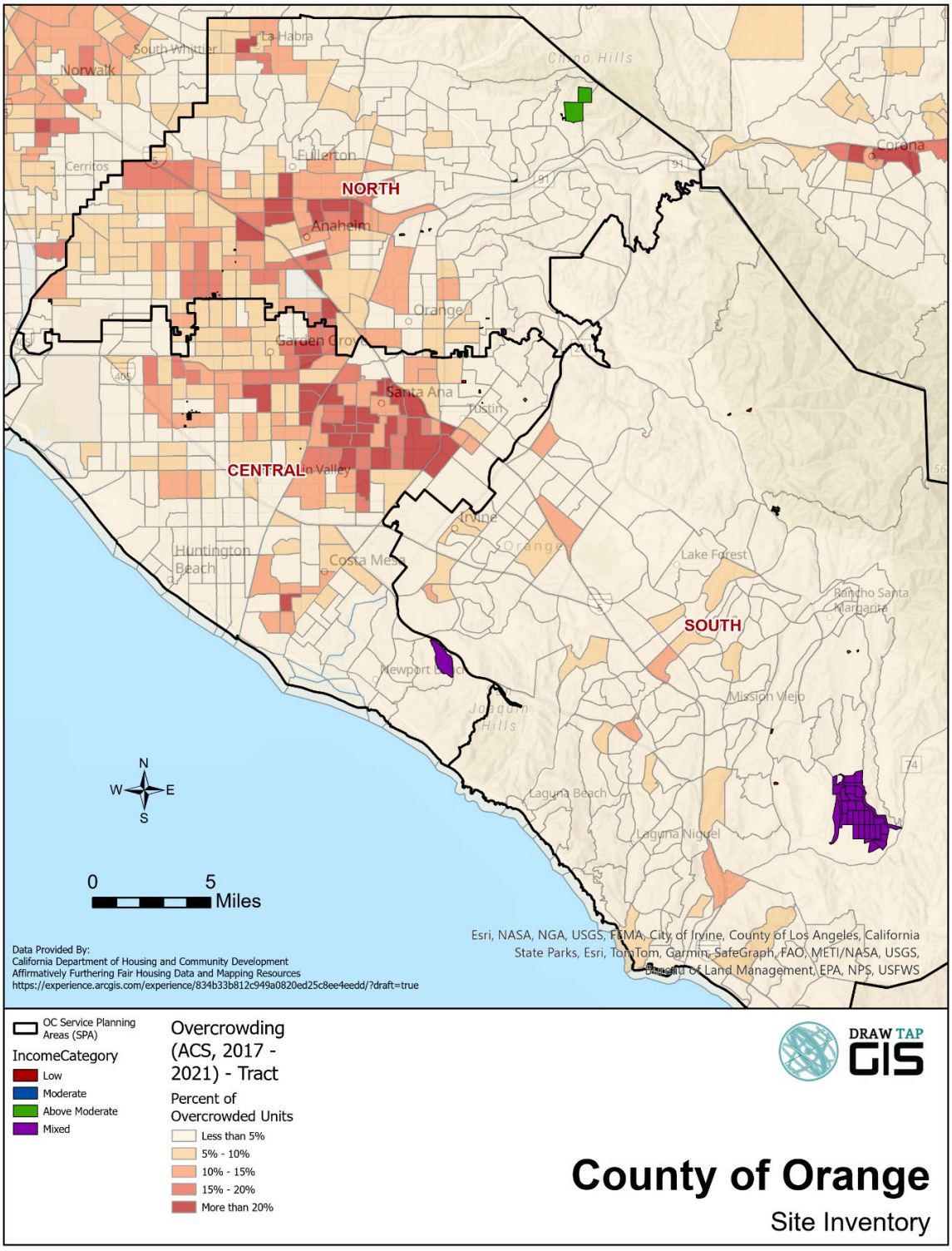
In general, overcrowding is more prevalent in the North and Central County areas (see **Figure 4-29**). As shown in **Table 4-46**, most RHNA units (82%) are in tracts where less than 5% of households experience overcrowding. However, a larger proportion of moderate- (89.5%) and above-moderate- (99.9%) income units are in tracts with populations of overcrowded households in this range. In comparison, 64.1% of lower-income units are in tracts where less than 5% of households are overcrowded, 4.6% where 5% to 10% of households are overcrowded, 29.1% where 10% to 15% of households are overcrowded, and 2.3% where 15% to 20% of households are overcrowded. There are no RHNA units of any income level in tracts where more than 20% of households are overcrowded.

Table 4-46
Sites Inventory by Overcrowded Households

Overcrowded Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<5%	3193	64.1%	1785	89.5%	4138	99.9%	9116	82.0%
5-10%	227	4.6%	31	1.6%	0	0.0%	258	2.3%
10-15%	1449	29.1%	100	5.0%	4	0.1%	1553	14.0%
15-20%	114	2.3%	79	4.0%	0	0.0%	193	1.7%
>20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable overcrowded populations within a single population range (i.e., there are multiple tracts containing RHNA units with overcrowded populations below 5%. The RHNA units shown are the summation of all units in various Unincorporated tracts with overcrowded populations in this range).

Figure 4-29
Distribution of RHNA Sites and Overcrowded Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Candidate Sites and Sensitive Communities At Risk of Displacement

As shown in **Figure 4-30**, tracts that are considered communities at risk of displacement are more populated in the North and Central County areas. The distribution of RHNA units by displacement risk is shown in **Table 4-47**. Most RHNA units (74.3%) are in tracts that are not considered vulnerable communities. However, more than half (51.2%) of RHNA units identified to meet the lower-income RHNA are in vulnerable communities compared to only 15.2% of moderate-income units and 0.1% of above-moderate-income units.

Table 4-47
Sites Inventory by Displacement Risk

Vulnerable Population (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
At Risk of Displacement	2550	51.2%	304	15.2%	4	0.1%	2858	25.7%
Not At Risk of Displacement	2433	48.8%	1691	84.8%	4138	99.9%	8262	74.3%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified as communities at risk of displacement (i.e., there are multiple tracts containing RHNA units that are considered communities at risk of displacement. The RHNA units shown are the summation of all units in various Unincorporated tracts that are considered communities at risk of displacement).

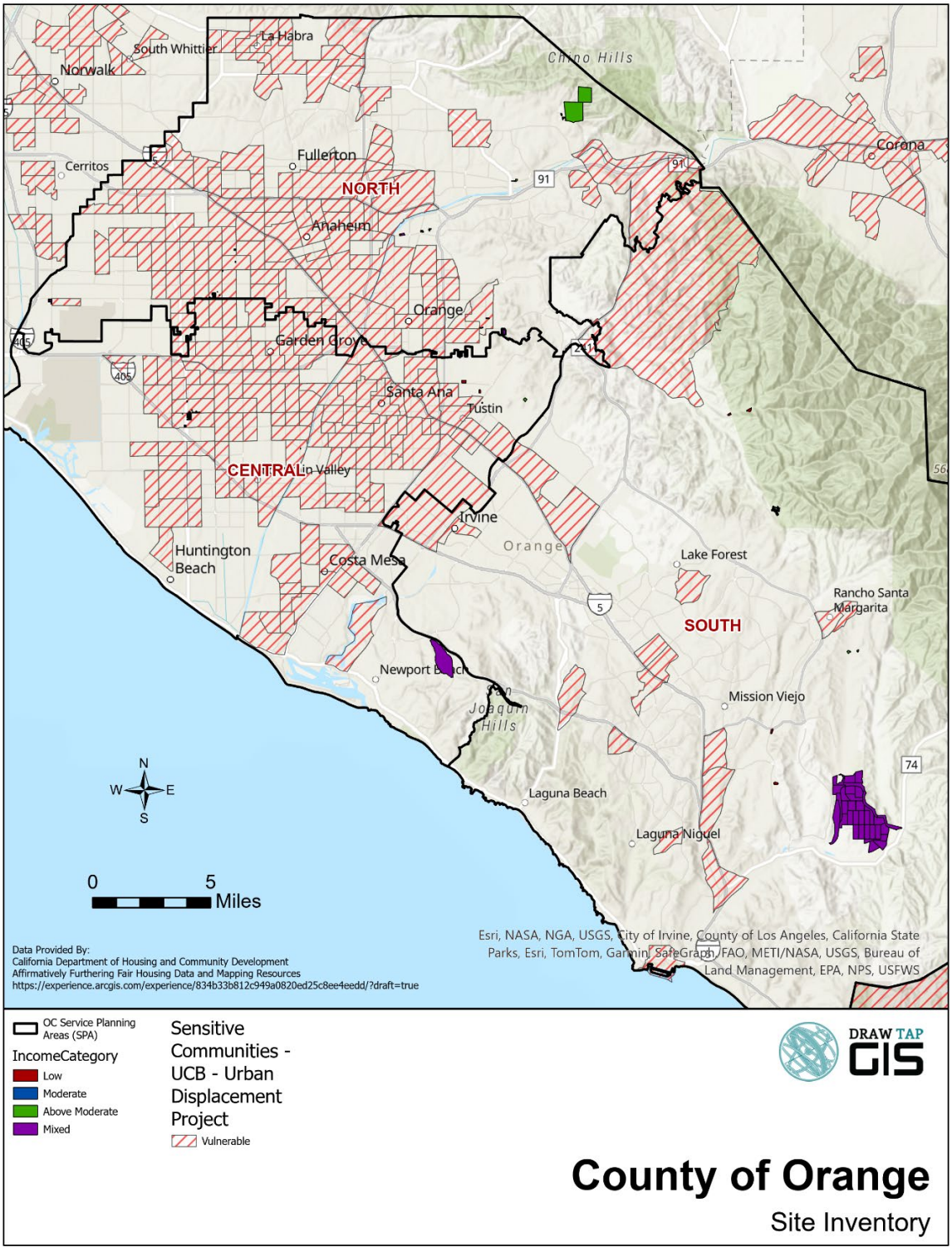
The sites inventory by Unincorporated CDP or tract is presented in **Table 4-48**. Of the tracts in North County where more than 500 RHNA units have been allocated, Rossmoor, tract 756.04, and tract 762.01, only tract 756.04 is considered a vulnerable community. In the North County, approximately 35.5% of RHNA units are in tracts that are considered vulnerable communities. In the Central County area, Midway City and tract 992.27 are considered vulnerable while North Tustin and tract 626.45 are not. In the Central County, 74.1% of RHNA units are in vulnerable communities. None of the Unincorporated County areas in the South are considered at risk of displacement.

Table 4-48
Sites Inventory by Displacement Risk – CDPs and Unincorporated Tracts

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate Income Units	Total RHNA Units	Vulnerable Community?
Northern Unincorporated County					
Rossmoor	525	188	0	713	No
Tract 218.16	130	0	44	174	No
Tract 218.25	0	0	420	420	No
Tract 219.13	302	26	0	328	Yes
Tract 756.04	351	164	0	515	Yes
Tract 762.01	409	215	0	624	No
Tract 762.02	431	0	0	431	No
Tract 871.01	177	0	0	177	Yes
Tract 877.01	0	36	0	36	Yes
Tract 877.03	50	0	0	50	Yes
Tract 878.05	0	31	0	31	Yes
Tract 878.06	114	48	0	162	Yes
Central Unincorporated County					
Midway City	1907	132	4	2043	Yes
North Tustin	45	0	63	108	No
Tract 626.45	62	124	432	618	No
Tract 992.27	0	31	0	31	Yes
Southern Unincorporated County					
Coto de Caza	0	0	113	113	No
Ladera Ranch	30	0	0	30	No
Las Flores	60	0	0	60	No
Rancho Mission Viejo	165	1000	3001	4166	No
Silverado	180	0	0	180	No
Trabuco Canyon	0	0	65	65	No
Tract 320.11	45	0	0	45	No

Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).

Figure 4-30
Distribution of RHNA Sites and Displacement Risk by Tract



Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).

Candidate Sites and AFFH Summary

This summary of candidate sites and AFFH variables will be described in subsections on the North, Central, and South County. The sites inventory and AFFH variables are presented in the table below. The sites inventory is also shown in **Figure 4-31.**

North Orange County. North Orange County is generally characterized by larger protected populations and reduced access to opportunities compared to the South County and parts of the Central County. A total of 3,661 RHNA units have been allocated in North Orange County, making up approximately a third (32.9%) of the total units identified countywide, consistent with the representation of North Orange County in this analysis (one third of the County). Of the 3,661 units, 2,489 are lower-income units (68%), 708 are moderate-income units (19.3%), and 464 are above-moderate-income units (12.7%).

Compared to the Central and South County areas, the North County has more moderate resource areas. However, nearly half (49.8%) of units identified in the North County are in the highest resource areas, followed by high resource areas (37.8%) and low resource areas (12.5%). It is relevant to note that 100% of above- moderate-income units in the North County are in highest resource areas compared to only 40.4% of low-income units and 49.7% of moderate-income units. Similarly, only 21.4% of RHNA units in North Orange County are in vulnerable communities at risk of displacement, but none of these units are allocated towards the above-moderate-income RHNA. Approximately 26% of lower-income units and 20% of above-moderate-income units are in sensitive communities at risk of displacement.

While the North County tends to face more issues related to fair housing compared to the Central and South County areas, actions outlined in this Housing Element aim to mitigate fair housing issues and increase access to economic, environmental, and housing opportunities in this area. Additionally, units identified to meet the RHNA are in North County tracts of variable TCAC allocations (moderate, high, highest), none of which are low resource areas. The distribution of RHNA sites in moderate and high/highest resource areas promotes more housing opportunities in moderate resource areas where there may be higher needs, while also increasing housing mobility by providing new housing opportunities in high resource areas. Further, though a larger proportion of tracts in the North County are considered LMI areas (where more than 50% of households have low or moderate incomes), most RHNA units in the North County area, including 81% of lower-income units, are not in LMI areas, ensuring new affordable housing does not exacerbate existing fair housing issues.

Central Orange County. Demographics trends in Central Orange County are the most variable of the three County subsections. In the central areas, trends tend to mimic those seen in the North County, while coastal areas tend to be more affluent with better access to opportunities. A total of 2,800 RHNA units have been identified in the Central County, including 2,014 lower-income

units (71.9%), 287 moderate-income units (10.3%), and 499 above-moderate-income units (17.8%). RHNA units in Central Orange County represent about 25% of the total sites inventory.

Most tracts in the Central County area with RHNA sites are highest or high resource areas. Of all RHNA units identified in the Central County, 25.9% are in highest resource areas, 54.2% are in high-resource areas, and 19.9% are in moderate resource areas. Nearly all (99.2%) above-moderate-income units are in highest resource areas. A larger proportion of low- (22.7%) and moderate- (34.5%) are in moderate resource areas compared to above-moderate-income units (0%). About 26% of units are in RCAAs including 5.3% of lower-income units, 43.2% of moderate-income units, and 99.2% of above-moderate-income units. Midway City is comprised of one moderate and one high resource area. Neither tract is an RCAA, but both are considered vulnerable communities. A total of 2,043 units (1,907 lower-income, 132 moderate-income, and 4 above-moderate-income) are in Midway City. North Tustin is comprised of all highest resource areas, all of which are RCAAs. None of the tracts in North Tustin with RHNA units are considered sensitive communities at risk of displacement. There are opportunities identified in North Tustin to accommodate 108 units (45 lower-income and 63 above-moderate-income).

South Orange County. South Orange County generally has higher incomes, smaller non-White populations, and higher access to opportunities compared to the Central and North County. Sites with a capacity to accommodate 4,659 units (480 lower-income, 1,000 moderate-income, and 3,179 above-moderate-income).

All communities in South Orange County where RHNA sites have been identified are considered highest resource areas. Opportunities to accommodate lower-income units have been identified in Ladera Ranch, Las Flores, Rancho Mission Viejo, and Silverado. Coto de Caza, Ladera Ranch, Las Flores, Rancho Mission Viejo, and Trabuco Canyon are all considered RCAAs. None of the tracts with RHNA sites in the South County are sensitive communities at risk of displacement.

Table 4-49
Candidate Sites and AFFH Summary

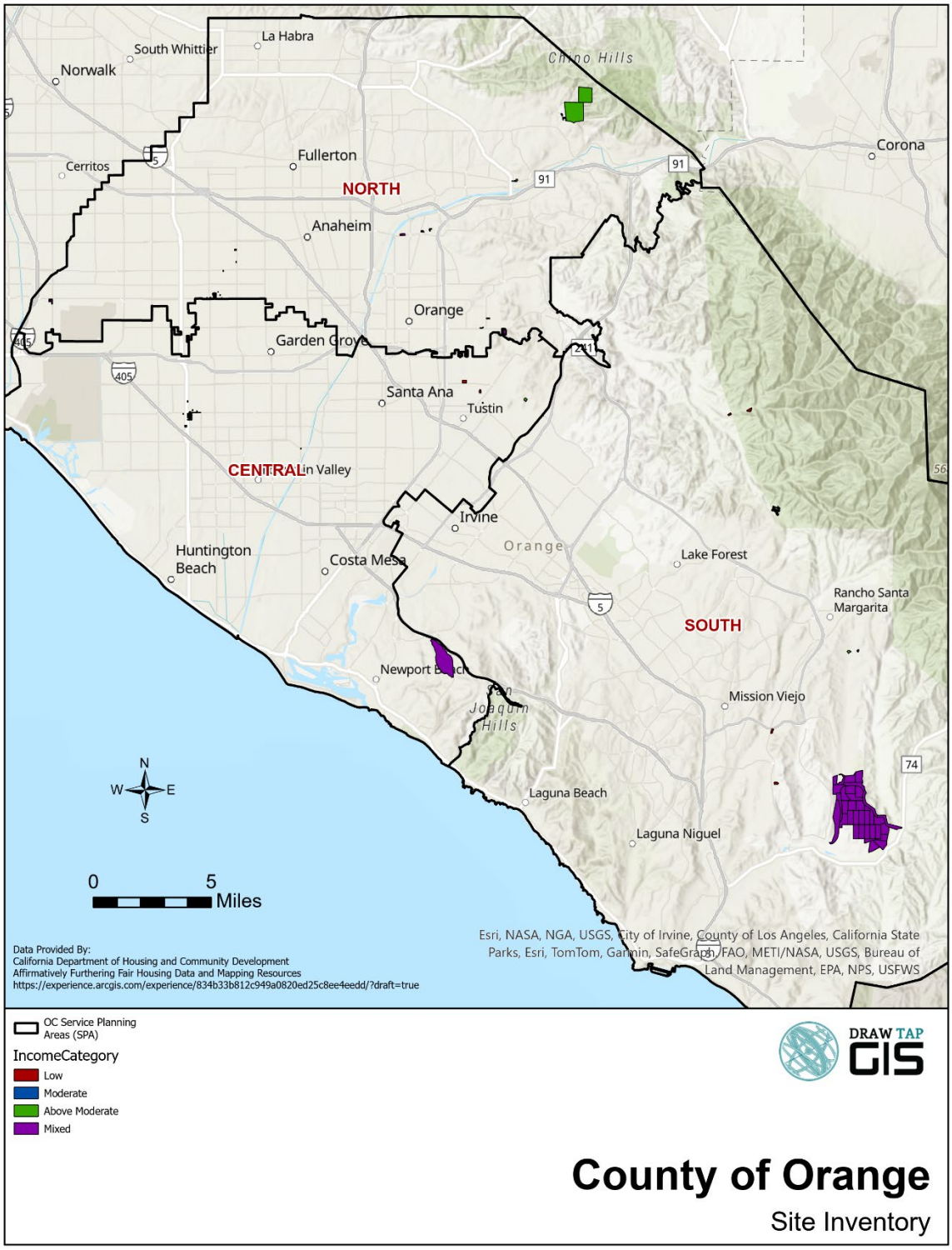
Area/Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			% Non-White	% LMI[1]	RCAA?	TCAC Opp. Cat.	At Risk of Displace-ment?
			Lower	Moderate	Above Moderate					
North County										
Rossmoor (1100.06)	1151	713	525	188	0	36.4%	21.7%	Yes	Highest	No
218.16	1929	174	130	0	44	34.2%	42.6%	Yes	Highest	No
218.25	1104	420	0	0	420	41.0%	17.2%	Yes	Highest	No
219.13	1971	328	302	26	0	76.1%	79.2%	No	High	Yes
756.04	2695	515	351	164	0	30.3%	9.5%	Yes	Highest	No
762.01	2639	624	409	215	0	55.6%	49.2%	Yes	High	No
762.02	1870	431	431	0	0	57.4%	20.6%	No	High	No
871.01	1653	177	177	0	0	74.7%	32.1%	No	Moderate	Yes
877.01	1556	36	0	36	0	74.0%	71.0%	No	Moderate	Yes
877.03	1670	50	50	0	0	81.2%	72.7%	No	Moderate	Yes
878.05	1755	31	0	31	0	82.5%	74.5%	No	Moderate	Yes
878.06	1606	162	114	48	0	86.0%	71.8%	No	Moderate	Yes
Subtotal		**3,661**	**2,489**	**708**	**464**					
Central County										
Midway City (997.01)	1909	526	458	68	0	87.3%	62.0%	No	Moderate	Yes
Midway City (997.02)	2465	1517	1449	64	4	76.5%	83.3%	No	High	Yes
North Tustin (756.03)	1437	10	0	0	10	30.0%	44.3%	Yes	Highest	No
North Tustin (756.05)	2080	16	0	0	16	36.2%	34.5%	Yes	Highest	No
North Tustin (756.06)	2111	37	0	0	37	33.4%	20.5%	Yes	Highest	No
North Tustin (757.02)	1138	45	45	0	0	31.9%	20.6% - 40.8%	Yes	Highest	No
626.45	2622	618	62	124	432	25.2%	6.9%	Yes	Highest	No
992.27	1882	31	0	31	0	74.3%	79.6%	No	Moderate	Yes
Subtotal		**2,800**	**2,014**	**287**	**499**					
South County										
Coto de Caza (320.44)	1951	113	0	0	113	21.5%	24.2%	Yes	Highest	No
Ladera Ranch (320.66)	2577	30	30	0	0	37.5%	60.0%	Yes	Highest	No
Las Flores (320.65)	1685	60	60	0	0	37.5%	35.6%	Yes	Highest	No
Rancho Mission Viejo (320.66)	2577	4166	165	1000	3001	37.5%	60.0%	Yes	Highest	No
Silverado (320.11)	672	180	180	0	0	21.8%	46.0%	No	Highest	No
Trabuco Canyon (320.41)	372	65	0	0	65	28.9%	26.5%	Yes	Highest	No

Table 4-49
Candidate Sites and AFFH Summary

Area/Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			% Non-White	% LMI[1]	RCAA?	TCAC Opp. Cat.	At Risk of Displace-ment?
			Lower	Moderate	Above Moderate					
320.11	672	45	45	0	0	21.8%	46.0%	No	Highest	No
Subtotal		**4,659**	**480**	**1,000**	**3,179**					

Note 1: LMI households are calculated at the block group level. Therefore, one tract may contain multiple block groups.
Source: HCD AFFH Data Viewer 2.0.

Figure 4-31
Sites Inventory Locations



Source: Orange County Sites Inventory, 2024.

Summary of Fair Housing Issues/Assessment of Contributing Factors to Fair Housing

Orange County AI

As identified by the Orange County AI and the above analysis, Orange County experiences the following local contributing factors to fair housing:

> *Cost burden and severe cost burden* and overcrowding are issues for all income categories of the populations in the Unincorporated County areas and across all racial and ethnic groups. The Hispanic and Black communities facing more acute housing problems (including affordability) than other racial and ethnic communities. Based on the data, affordability is a serious issue for residents in Unincorporated County areas as with all residents in the State. Contributing factors may include the relative lack of multifamily housing units, the increased population (though the population of Unincorporated County areas has decreased as areas of the Unincorporated County areas have been annexed) and the lack of significant numbers of new affordable housing units being built.
>
> While 7.8% of Unincorporated County area residents have *disabilities*, the units available to disabled persons currently and funded by the County and other sources, likely address the needs of the smaller disabled population in the Unincorporated County areas and thus, this need is lower priority than the need for affordable, elderly, and multifamily housing (which could address affordability and overcrowding.
>
> There are five *racially or ethnically concentrated census tracts (RECAPS)* within Orange County as identified by HUD. These areas, however, are not in the Unincorporated County areas over which the County of Orange has land use jurisdiction. These identified census tracts have at least 50% non-white populations with a poverty rate that exceeds 40% and/or is three or more times the average tract poverty rate for the metropolitan area.
>
> The UC Davis Regional *Opportunity Index* shows that most residents within Orange County have moderate to high levels of access to opportunity, with some areas of low access. Additionally, analysis of the TCAC/HCD Opportunity Area Maps show that a large number of census tracts in northern Orange County have a "low resource" designation, meaning there is low access to essential resources for existing residents in those census tracts.
>
> The County is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying *displacement*. The AI also identifies the following cross-jurisdictional fair housing goals to mitigate the existing fair housing issues in the community:
>
> - Increase the supply of fair housing in high opportunity areas.

- Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, Vietnamese residents, seniors, and people with disabilities.
- Increase community integration for persons with disabilities.
- Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.
- Expand access to opportunities for protected classes.

Section 5, the County's Housing Action Plan, includes policy programs that seek to provide for an increased variety of housing types affordable to all economic segments of the community, as well as further improve general access to housing. The policy programs will provide additional opportunities for current residents and provide new housing opportunities for future residents.

Identification and Prioritization of Contributing Factors

1. Concentrations of Special Needs or Protected Populations

The North and parts of the Central County areas tend to have larger racial/ethnic minority and LMI household populations compared to the South County. These areas also tend to have more prevalent disproportionate housing needs such as overcrowding and displacement risk.

Priority Level: Low

Contributing Factors:

- Lack of investment in certain neighborhoods
- Quantity of affordable housing

2. Lack of Housing Options for Persons with Disabilities

The Central and South Orange County areas tend to have larger elderly populations and populations of persons with disabilities. Certain neighborhoods may have an increased need for housing for persons with disabilities.

Priority Level: Medium

Contributing Factors:

- County ordinances related to persons with disabilities

3. Disparities in Access to Opportunities

Certain neighborhoods, especially in the North and Central County areas, tend to be comprised of more low and moderate opportunities, whereas the South County is predominantly highest resource. These areas also have more tracts with communities at risk of displacement and populations of protected classes.

Priority Level: Low

Contributing Factors:

- Unaffordable rents and sales prices in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private and public investment in specific neighborhoods

4. Disproportionate Housing Needs

Within the Unincorporated County areas, there is a mix, with some pockets that are either established middle-income areas, at risk of becoming exclusive, or are susceptible to or have ongoing displacement. The Unincorporated County areas specifically appear to have a mismatch between the demand for larger affordable units and the available affordable units, as well as (similar to the rest of Orange County) high housing costs.

Priority Level: High

Contributing Factors

- Unaffordable rents and sales prices in a range of sizes
- Shortage of subsidized housing units
- Cost of repairs and rehabilitation
- Dominance of single-family housing, which is typically more expensive than multifamily

5. Fair Housing Enforcement and Outreach

Fair housing outreach for residents in the Unincorporated County is limited and residents may be unaware of their rights and responsibilities, as well as resources available. The County does not currently have a method for the dissemination of fair housing information.

Priority Level: Low

Contributing Factors:

- Limited resources to pay for outreach
- Increasingly fewer people rely on newspapers to receive information; public notices and printed flyers are costly and ineffective means to reach the community at large
- Unknown language barriers and resource barriers to accessing information

5. HOUSING ACTION PLAN

This section of the Housing Element presents the County's Housing Action Plan for the period 2021-2029. The goals, strategies and actions described below are organized according to major issue areas and reflect the findings of the County's needs assessment and evaluation of the accomplishments since the last Housing Element update. The County will review these strategies and actions continuously throughout the planning period and adjust better accomplish the objectives as necessary.

Based on the data in Community Profile, Section 2, the County should consider the following findings, which inform the programs proposed:

- The Unincorporated County population is showing aging trends. Senior residents, generally defined as those over 65 years of age, made up approximately 14.3% of the population in Unincorporated County areas. Based on these trends, housing should consider the needs of seniors who may have less flexible income and need accessibility or assisted living. **See Program 4.**
- Housing should account for cultural needs including larger or multifamily housing units since about 16% of renter households and about 15% of owner households have five or more members (Table 2-43) and additional housing information in other languages. **See Program 3.**
- Table 2-16 Median income shows that Unincorporated Midway City, El Modena, West Anaheim, and Stanton, are all lower-income CDPs based on the median Orange County income of $100,485. The County should, to the extent possible, support affordable housing in those CDPs and throughout Unincorporated County areas. **See Programs 3, 4 and 11**
- Approximately 52.44% of renters (Table 2-31) and 22.7% of homeowners spend more than 30% of their income on housing, indicating a high housing cost burden overall with a higher percentage of renters compared to owners experiencing overpayment. **See Programs 3 and 11.**
- Based on for sale and rental prices, moderate-income households cannot afford to own a home in Unincorporated County areas (Table 2-25 compared to Table 2-26), while lower-income households cannot afford to own or rent without experiencing cost burden (Table 2-25compared to Table 2-28). **See Programs 3 and 11.**
- Table 2-17 demonstrates 53% of rental units and 72.9% of owner-occupied units in Unincorporated County areas are 30 years old or greater, thus, renovations may ensure safer living environments. **See Program 6.**
- Table 2-23 shows a low vacancy rate in Unincorporate County areas at 3.8%, which indicates a high housing demand. **See Program 3.**

- Table 2-39 shows that 12% of homeowners in Unincorporated CDPs who are lower- income have at least one housing problems, while 40% of renters in Unincorporated CDPs who are lower-income have at least one housing problem. Housing problems include: Units with physical defects (no kitchen or bathroom), overcrowding, housing cost burden exceeding 30% of income or severe housing costs burden of 50% of income. **See Program 3 and 6.**

Strategies

- Ensure that the General Plan and Comprehensive Zoning Code identify and zone sufficient land at appropriate densities to accommodate the County's share of regional housing needs.
- Facilitate production of high-quality affordable housing for lower-income and special needs households and permanent supportive housing including affordable housing opportunities for households with incomes less than 30% of area median income (AMI) through inclusionary housing, incentives, and financial assistance.
- Conserve and improve the condition of the existing housing stock, especially affordable housing.
- Work cooperatively with cities and LAFCO to facilitate the annexation and revitalization of urbanized Unincorporated islands.
- Promote equal housing opportunities for all persons without discrimination on the basis of race, religion, ethnicity, sex, age, marital status, disability, or household composition through enforcement of fair housing laws.
- Encourage the development of supportive housing for persons with disabilities, and protected classes, through the following actions.
    - Conduct outreach and education on fair housing rights and of the process to make appropriate referrals for fair housing complaints.
    - Provide housing resources for prevention of homelessness and alternative housing for the homeless and disabled.
    - Address contributing factors to fair housing issues – including access to regional, economic, educational, and environmental opportunities.
    - Encourage the use of energy conservation features in residential construction, remodeling, and existing homes.

Programs, Objectives, Responsible Agencies, Funding Sources

An adequate supply of housing at affordable prices is critical to the long-term economic viability of Orange County. Previous surveys of business leaders have shown that the price of housing is

the leading barrier to business expansion. A shortage of housing at affordable levels makes it more difficult for businesses, government, and universities to recruit new employees, and exacerbates traffic congestion and air quality problems as workers commute longer distances in search of housing.

Through the Regional Housing Needs Assessment (RHNA) process, each jurisdiction is allocated a portion of the region's housing need through the year 2029. The current RHNA allocation projects housing need through the year 2029. The County of Orange's allocation for the 2021-2029 planning period, according to income category is shown in **Table 5-1**.

Table 5-1
Summary of Housing Needs by Income Category – 2021-2029

Extremely Low	Very Low	Low	Moderate	Above Mod	Total
1,570 units	1,569 units	1,866 units	2,040 units	3,361 units	10,406 units
15.1%	15.1%	17.9%	19.6%	32.3%	100%
Source: SCAG, 2021					

State law requires that jurisdictions adopt plans and policies to address their RHNA allocation for each planning cycle. The County proposes to address its allocated need for the current planning cycle through a variety of policies and programs that minimize constraints to the development of new housing and proactively assist in the development of housing for persons with low and moderate incomes. As discussed previously, the County's most important, but increasingly limited, resource for housing production is vacant buildable land.

As seen in County's land inventory (Appendix B), the Unincorporated territory under the jurisdiction of the County has shrunk considerably over the past 30 years due to annexations and incorporations. Seven new cities in South County incorporated during this time and multiple major annexations occurred. Taken together, these jurisdictional changes resulted in a loss of over 60,000 acres of Unincorporated territory, with its associated population and developable area.

The key implication of these jurisdictional realignments is that a far greater portion of new residential development in Orange County as a whole will take place within incorporated cities than in years past. Since only one major new planned community remains to be completed in the Unincorporated County areas (the Ranch Plan Planned Community in Rancho Mission Viejo), the County will continue to place major emphasis on infill development strategies in the urbanized Unincorporated islands. This policy will require close cooperation with adjacent cities and surrounding neighborhoods to ensure that new development is compatible with the existing fabric of these communities. A key strategy for the County is to encourage housing development on existing non-residential sites, including underutilized sites along arterial highways, through

application of the Housing Opportunities Overlay Zone. See Appendix B for a detailed discussion on this topic.

Program 1. Provide Adequate Sites, No Net Loss, and Site Replacement

Objectives:

The County has a remaining RHNA of approximately 7,953 units for the 2021-2029 RHNA planning period after credits for permitted or approved units, and actual and projected ADU development are taken into consideration. After sites that do not require rezoning are identified there is a RHNA shortfall is 4,719 units. To address the shortfall, the County has identified various sites that, while appropriate for redevelopment and intensification, required zoning amendments to increase residential development potential and serve as a significant incentive for redevelopment. The Board of Supervisors approved a Zone Change and Zoning Code Amendment in June 2024 to accommodate the remaining RHNA units.

Sites Rezoning

The RHNA shortfall to be addressed for the 2021-2029 planning period is 2,343 units in the very low- income category, 1,624 units in the low-income category, and 752 units in the moderate-income category. The County has made available sites to accommodate the RHNA shortfall by:

- Amending the Housing Opportunities Overlay (HOO) to accommodate a higher density of development by raising the maximum density from 43.5 to 70 du/ac, excluding any applicable density bonus units. The density is available to all properties in the HOO for the development of affordable housing.
- Establishing a minimum density of 30 dwelling units per acre in the Multifamily Dwellings (R2), Apartment (R3), Suburban Multifamily Residential (R4), Residential Profession (RP), and Mixed-Use (MX) zoning districts
- Rezoning properties with a current zone designation of Local Business (C1), General Business (C2), Commercial Community (CC), Commercial Highway (CH), Commercial Neighborhood (CN), or Residential Profession (RP) to the Mixed-Use (MX) zoning district
- Expanding the HOO by adding properties within the Multifamily Dwellings (R2), Apartment (R3), and Suburban Multifamily Residential (R4), Light Industrial (M1) and Mixed-Use zoning districts to the HOO

The County has identified 150 parcels that can be grouped into 59 sites (71.73 acres total) in the newly amended base districts with an HOO overlay. The amendments and rezoning were completed in July 2024. Sites that were rezoned, listed in the sites inventory table in the appendix, have an identified total realistic capacity of 5,137 units (exceeding the RHNA shortfall).

Table 5-2
Summary of Areas to be Rezoned

Zoning	Acres	Parcels	Total Units
HOO-Residential R-2	1.15	5	80
HOO-Residential R-3	1.99	9	142
HOO-Residential R-4	3.06	14	217
HOO-Mixed-Use	57.91	115	4,160
HOO-Other (M-1)	3.15	3	254
HOO Religious Institution Sites	4.47	4	284
Total	**71.73**	***150***	**5,137**

- *HOO: Housing Opportunity Overlay*
- *Density in all portions of the Housing Opportunities Overlay Zone is 70 units/acre and can go as high as 84 units/acre through a graduated density approach based on project size for projects that consolidate multiple properties.*
- *All base zoning districts in the site inventory require a minimum density of 30 units/acre.*

Sites that were rezoned and used to address an unaccommodated, lower-income RHNA (2,343 very low- income and the 1,624 low-income units) are subject to additional requirements under State law. Housing Element law (Government Code 65583.2[h]) requires that the County accommodate all the lower-income, unaccommodated RHNA on sites that are:

- Zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower-income households during the planning period; and
- Permit at least 16 units per site at a density of at least 20 units per acre; and
- At least half of the very low- and low-income housing need must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all the very low- and low-income housing need on sites designated for mixed-uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

The site inventory shows that most of the lower-income RHNA shortfall (3,967 units) is addressed on sites that allow mixed-use development. Sites to accommodate the moderate-income RHNA shortfall (752 units) are not subject to these requirements.

No Net Loss

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element site inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify, at the time of

approval, the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city or county must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project.

The County will evaluate residential development proposals for consistency with goals and policies of the General Plan and the 2021-2029 Housing Element sites inventory and make written findings that the density reduction is consistent with the General Plan and that the remaining sites identified in the Housing Element are adequate to accommodate the RHNA by income level. If a proposed reduction of residential density will result in the residential sites inventory failing to accommodate the RHNA by income level, the County will identify and make available additional adequate sites to accommodate its share of housing need by income level within 180 days of approving the reduced density project.

Site Replacement
Government Code Section 65583.2(g)(3) requires the replacement of units affordable to the same or lower-income level as a condition of any development on a nonvacant site identified in the Housing Element consistent with those requirements set forth in Government Code section 65915(c)(3). Replacement requirements shall be met for sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or
- Occupied by low or very low-income households For the purpose of this program "previous five years" is based on the date the application for development was submitted.

Pursuant to Government Code section 66300(d) (Chapter 654, Statutes of 2019 (SB 330)), the County shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund, State and Federal Grants (see funding descriptions below)

Timeframe: Rezoning actions: Adopted by the Board of Supervisors on June 25, 2024; as part of the entitlement review process, evaluate new projects for consistency with General Plan

objectives as they relate to housing and RHNA obligations; ongoing implementation and annual assessment of status of housing sites inventory as part of the annual reporting process.

Program 2: Zoning Code Amendments

Objectives:

- Comply with Government Code Section 65583.2 which requires that vacant sites that were identified in the County's 4th and 5th cycles Housing Element as sites for the lower-income RHNA and nonvacant sites that were identified in the County's 5th cycle Housing Element as sites for lower-income RHNA are subject to by-right approval (exempt from CEQA) and subject only to design review based on objective standards, when a project includes 20 percent of the units affordable to lower-income households and no subdivision is proposed. The County did not identify vacant potential sites in this 6th Cycle site inventory that were identified in the previous two cycles and thus, there are no vacant sites that need to be re-zoned. Parcels that are subject to by-right approval pursuant to State law are identified in Appendix C.
- Continue to allow emergency shelters without Use Permit or other discretionary permit in the commercial and industrial portions of the Housing Opportunities Overlay Zone subject to appropriate development standards pursuant to Government Code Sec. 65583.a.4.
- Remove the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable units. These uses will be allowed as a by-right use. For multifamily development with 5 or more units, the Site Development Permit requirements will be amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards.
- Adopt Objective Design Standards (ODS) to provide local guidance on design and standards for housing development, including by-right projects, as allowed by State law and the Housing Accountability Act which prohibits a local agency from disapproving or reducing the density of housing development projects that comply with local and state regulations unless the agency can make certain written findings.

Responsible Agencies: OC Community Resources, OC Housing Authority, and OC Development Services

Funding Sources: General Fund, State and Federal Grants and Loans (see grant descriptions below), HUD Housing Choice Voucher Program Section 8

Timeframe: Rezoning actions and ODS: Adopted by the Board of Supervisors on June 25, 2024.

Program 3. **Facilitate Affordable Housing Development**

The County will provide an adequate supply of housing that varies sufficiently in cost, style, tenure, and neighborhood type to meet the economic and social needs of existing and future residents of the county; and which provides sufficient housing opportunities to achieve a better jobs-housing balance for employees of businesses located in the Unincorporated County areas.

Objectives:

Specifically, the County will:

- Within 12 months of Housing Element adoption/certification, encourage and facilitate affordable housing development by providing information on the County website about opportunities and resources for affordable housing development. Specifically:
    - Create a Housing Opportunities Overlay Map and webpage to providing information about the Housing Opportunities Overlay and identify areas where higher density projects would be permitted with expedited processing, and which may be eligible for density bonuses.
    - Develop informational materials on the County's website regarding the County's lot consolidation incentives and density bonus program.
- OC Development Service's "Affordable Housing Project Manager" will promote the MyOCeServices web portal and the ease of application review and approval of affordable housing projects. The Affordable Housing Project Manager will ensure that permit issuance for proposed projects is not unnecessarily delayed.
- Every two years, review incentives for density bonuses, expedited permit processing procedures, development standards, tax-exempt conduit financing, infrastructure financing assistance, and direct financial assistance to determine if changes or updates are needed to further facilitate the production of affordable units.
- Within one year of approval of the Housing Element and approval by the Department of Housing and Community Development, OC Development Services will update its "Orange County Housing Opportunities Manual" and will also create and distribute promotional materials explaining the County's expedited permit processing and incentives for affordable housing to be provided to

developers in the region. The following incentives for the development of affordable housing are offered or will be offered:

- Expediting the approval process for parcel maps that include affordable housing units.
- Ministerial (no public hearing) review of lot line adjustments.
- Provide technical assistance, through the OC Community Resources division, to acquire funding.
- Modification of development standards.

- Create an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law.
- The County will continue to participate in the Housing Choice Voucher Program (See Program 10) to provide rent subsidies to very low-income households, provided funding is available. On an ongoing basis, review the County Housing Authority's participation in the Housing Choice Voucher Section 8 Rental Assistance Program and pursue additional vouchers/funding when available. Review annually and update the Supportive Housing Notice of Funding Availability for financial assistance for the development of housing.
- Continue to publish the Affordable Housing Rental List and review/update list annually.
- Continue to support the DPRC in reviewing existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production. This includes ensuring guidance documents that are available to applicants clearly identify which approvals and/or permits specific housing projects are generally exempt from (e.g., lot consolidation for small housing sites does not generally require a parcel map). Approved DPRC policy and code amendment recommendations will be implemented within one fiscal year from approval.
- Review funding opportunities bimonthly and pursue, as the County has been, all state and federal housing grant funds for which the County is eligible.
- Approve affordable housing projects in Rancho Mission Viejo administratively and report annually to State HCD and the Board of Supervisors regarding

progress toward the development of Rancho Mission Viejo and its affordable housing sites through a required Annual Monitoring Report

- Coordinate with the City of Newport Beach for development and shared RHNA credit of the identified parcels on the County-owned Coyote Canyon site (as shown in Appendix B). Include 30% of the County's total unit share as affordable units (618 total units including 186 units set aside for deed-restricted, affordable housing for lower-income [10%] and moderate-income households [20%]).
- Work with all applicants proposing rental residential projects to encourage four-bedroom units that can providing adequate housing for all households, including large-family households (which are defined as those consisting of five or more members).
- Within 1 year of adoption of the Housing Element and approval by the Department of Housing and Community Development, meet with Developers and DPRC to identify potential constraints to the development of affordable housing and housing for those with special needs in the County's Zoning regulations. Address any identified constraints within 6 months.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund, State and Federal Grants (see funding descriptions below).

Timeframe: Administrative review process for qualified development projects: Adopted July 2024; HOO map and website within 18 months of Housing Element adoption and certification; Update Housing Opportunities Manual (completed in July 2024) and create and distribute lot consolidation incentives and density bonus informational materials: March 2025. Initiate review of incentives by June 2025; meet with developers and the DPRC starting in January 2025; Implement approved DPRC policy and code amendment recommendations within one fiscal year from approval.

Program 4: Promote Affordable Housing

In connection with other programs, continue to work with existing partners and seek new partners and volunteers from stakeholder and industry groups to further opportunities and provide incentives where possible for affordable housing.

Objectives:

Proactively encourage and facilitate the development of affordable housing by developers and Orange County jurisdictions for lower-income households,

particularly those with special needs including large households, seniors, extremely low-income (ELI) households, and households with persons who have disabilities or developmental disabilities. OC Community Resources staff will work cooperatively with other governmental agencies, business groups, universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County's long-term viability and the programs to facilitate affordable housing.

Specifically, the County will:

- On an ongoing basis, provide letters of support to affordable housing developers' applications to local, State, and Federal agencies for funding, provided the proposed projects are consistent with the goals and policies of the General Plan.
- Within 2 years of Housing Element approval, seek concurrence from the state Department of Housing and Community Development that affordable units built in cities and assisted with County funds (i.e., multi-jurisdictional agreement) should be partially credited toward the County's housing production for RHNA purposes in proportion to the amount of County funding.
- Work with cities and developers to identify incentives to reach agreements to transfer Regional Housing Needs Assessment (RHNA) credits for units transfer within city boundaries through a multi-jurisdictional agreement. Review strategy and approach annually.
- Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing. Consult with LAFCO at least once annually to identify priority areas with the highest potential for affordable housing development and annexation.
- Support development of affordable housing on religious property consistent with State law. Meet with owners of the religious properties identified in the inventory of sites to address the 6th Cycle RHNA (Appendix B). Provide information about regulatory changes (such as streamlined development), development standards and affordability requirements and incentives and/or assistance available through the County for development of housing on religious institution properties. Send the same informational material to all churches in the Unincorporated County.

- Meet annually with developers and housing organizations to evaluate projects for acquisition and rehabilitation/new construction of new shelters, and long-term affordable housing, including senior housing.
- Conduct an annual informational meeting with stakeholders, including the development community and property owners to facilitate housing development, including discussion of ADUs, expedited permit processing and lot splits or consolidations.
- Attend and promote development incentives at the bi-monthly Continuum of Care (CoC) Housing Opportunities Committee meeting and the bi-monthly OC Housing Finance Trust meetings.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Source: General Fund

Timeframe: Meet with non-profit developers and housing organizations every other year starting in 2025; Meet with owners of the religious properties identified in the inventory of sites to address the 6th Cycle RHNA by January 2025; Meet with the City of Newport Beach: November 2024; Initiate annual LAFCO meetings: January 2025.

Program 5: Density Bonus Ordinance

In compliance with Government Code section 65915, *et. seq.* the County has a Density Bonus ordinance that has been amended as needed to comply with State law, and which will continue to be amended as needed to comply with State law.

Objectives:

- Update Density Bonus Ordinance as needed to reflect changes to State Density Bonus law.

Responsible Agency: OC Development Services

Funding Source: General Fund

Program 6: Rehabilitate and Preserve Existing Residential Units, Especially Affordable Units

New construction represents a relatively small percentage of the Unincorporated County areas' total housing inventory. The preservation and rehabilitation of the existing housing stock, especially affordable apartments, is essential to meet the County's housing needs. Most of the

housing in need of rehabilitation within the Unincorporated County areas is in the older Unincorporated islands in North County. While no affordable units are at-risk of converting during the planning period, assisted rental projects that are eligible to convert to market rate due to the expiration of agreements between the owners and government agencies are of particular concern. The County participates in a variety of programs that provide assistance and incentives to property owners for carrying out needed repairs. Projects eligible to convert to market rate have also been evaluated for opportunities to extend existing commitments to maintain rents at affordable levels, and the County has regularly been successful in extending commitments to maintain rents at affordable levels.

It is also recognized that mature areas such as northern Orange County require ongoing investment for the general maintenance and periodic replacement of infrastructure such as streets, sidewalks, water and wastewater systems, storm drains, streetlights, landscaping, and other public facilities in order to maintain the quality of residential neighborhoods. Without this public investment, residents and landlords may be discouraged from making needed repairs to their properties and gradual deterioration may occur. In addition to the County's General Fund, the federal CDBG program provides financing for accessibility upgrades infrastructure maintenance and replacement.

Many of the older Unincorporated neighborhoods are in "islands" within city spheres of influence. The Board of Supervisors has established a policy of working cooperatively with the cities and LAFCO to facilitate the annexation of these islands in a timely manner. Where possible, such annexations should be part of a comprehensive program to help revitalize these communities by upgrading substandard housing and other facilities such as streets, storm drains, sidewalks, parks, and schools. Absent annexation, the County also expends County funds on public infrastructure projects within these Unincorporated "islands" to ensure the public facilities remain functional and compliant with modern regulations.

Objectives:

- Use available housing funding to finance housing rehabilitation. Assist ten households through rehabilitation efforts annually.
- While no affordable housing units have expiring affordability covenants, continue to monitor affordable housing projects with affordability covenants and take appropriate action to preserve these affordable units whenever they become at-risk of converting to market rate housing (e.g., extending contracts for participation in affordable housing programs).
- On an ongoing basis, implement and review the County's code enforcement and graffiti removal programs. Facilitate five improvements annually through the code enforcement and/or graffiti removal programs.

- On an ongoing basis, provide infrastructure maintenance in existing residential neighborhoods, including through the Capital Improvement Program (CIP). Facilitate 10 infrastructure improvements, including seven in the North and Central County Unincorporated areas during the planning period.
- On an ongoing basis, participate in the CDBG, HOME and related programs as a means of providing pass-through funding to affordable housing projects and efforts to rehabilitate existing affordable units or projects. Review opportunities annually.
- On an ongoing basis, enforce the provisions of the County's condominium and mobile home park conversion ordinance (section 7-9-89 and 7-9-92). Review compliance annually.

Responsible Agencies: OC Community Resources, CEO/Public Finance, and OC Development Services

Funding Sources: General Fund, State and Federal Grants and Loans (see grant descriptions below), CBGB and HOME (see Program 10, Pursue Funding Sources and Programs).

Program 7: Accessory Dwelling Units

In July 2020, the County updated the Comprehensive Zoning Code in accordance with the October 2019 passage of California Assembly Bill AB 68 (AB 68), Assembly Bill 881 (AB 881), Assembly Bill 587 (AB 587), Assembly Bill 671 (AB 671), and Senate Bill 13 (SB 13). The provisions encourage the development of ADUs by making the process less restrictive for homeowners and provide incentives for their development and/or preservation. ADUs are an important and feasible method for providing additional affordable housing units while maintaining the existing character of the Unincorporated County areas.

Objectives:

- Facilitate the development of Accessory Dwelling Units through:
    - Implementation of, within 2 years of adoption of the Housing Element and its certification by the Department of Housing and Community Development, an informational program to disseminate easily understandable information to homeowners regarding the construction of ADUs in the Unincorporated County areas. This will include the creation of a webpage on the County's website, fact sheets available in public areas, and notification to all citizen advisory groups. Disseminate information annually starting in January 2025.

- Preparation of pre-approved ADU plans to assist the public and streamline development of ADUs (Completed July 2024).
- Implementation of the Affordable Accessory Dwelling Unit Loan Program Policy Manual (July 19, 2023), within 2 years, designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences. Aimed to expand access to income opportunities for homeowners while also providing much needed affordable rentals exclusively for very low-income tenants with a priority on Section 8 voucher holders.

- Continue to track ADU Development through the ADU Monitoring Program. The program tracks applications for ADUs, location, and affordability of any ADUs offered for rent within the Unincorporated County areas. The intent of the Monitoring Program is to track progress in meeting 2021-2029 ADU construction goals and to evaluate the need to adjust programs and policies if the pace of construction is less than anticipated. Should changes need to be made due to a gap in the number of ADUs projected and the number permitted, the County will make changes proportional to the gap identified within 6 months of the annual review. This may include, but is not limited to, rezoning or community outreach.

Responsible Agencies: OC Development Services

Funding Sources: General Fund

Timeframe: Pre-approved ADU plans available to the public: Completed July 2024; ADU informational program: June 2025; Implementation of the Affordable Accessory Dwelling Unit Loan Program Policy Manual: June 2026

Objective*:* 513 ADUs during the planning period (this objective is a subset of and not in addition to the Quantified Objective for Program 1: Adequate Sites)

Program 8: Equal Housing Opportunity – Affirmatively Furthering Fair Housing

Equal housing opportunity is a fundamental right of all Americans. Federal and state fair housing laws make discrimination illegal, but enforcement action is sometimes necessary to ensure that existing laws are upheld. Existing federal law also requires new buildings to make reasonable accommodation for persons with disabilities. Section 4 provides a detailed assessment of the County's fair housing status. Additionally, the actions below aim to meaningfully address the fair housing and contributing factors identified in the most recent Orange County Analysis of Impediments to Housing Choice (AI) report and by the analysis provided in Section 4. An objective of this program is to facilitate the development of housing

that meets the needs of all segments of the population including affordable housing and households with specialized needs.

***Objectives**:*

- Objectives, timelines, geographic targeting, and 8-year metrics for actions to affirmatively further fair housing are detailed below. Actions include implementations measures under other programs in this Housing Element and new actions specific to this Program 8.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund. State and Federal grants and loans

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
Fair Housing Outreach and Enforcement				
Program 3: Facilitate Affordable Housing Development	Create a Housing Opportunities Overlay Map and webpage providing information about the Housing Opportunities Overlay and identify areas where higher density projects would be permitted with expedited processing, and which may be eligible for density bonuses.	Within 18 months of adoption/ certification of the Housing Element.	Countywide	Develop outreach and informational materials with the goal of facilitating the development of 8,122 housing units during the planning period.
	Develop informational materials on the County's website regarding the County's lot consolidation incentives and density bonus program.			
	Update the "Orange County Housing Opportunities Manual" and will also create and distribute promotional materials explaining the County's expedited permit processing and incentives for affordable housing to be provided to developers in the region.	Within 1 year of adoption and certification of the Housing Element.		
	Publish and review the Affordable Housing Rental List.	Annually		
Program 4: Coordination with Affordable Housing Stakeholders	Provide letters of support to affordable housing developers' applications to local, State, and Federal agencies for funding, provided the proposed projects are consistent with the goals and policies of the General Plan.	Initiate by January 2025 Annually	Countywide	Annually coordinate with regional entities and stakeholders to pursue and identify priority areas for affordable housing opportunities.
	Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing.			
	Conduct meetings with stakeholders, including the development community and property owners to facilitate housing development.			
	Attend and promote development incentives at the monthly Housing Opportunities Committee meeting and the bi-monthly OC Housing Finance Trust meetings.	Twice annually		
Program 8. AFFH	Implement Restrictive Covenant Modification Plan (RCM) including Phase III, examination of remaining handwritten documents for unlawful languages and process.	By July 2027	Countywide	Complete all three Phases of the RCM Implementation Plan during the planning period.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	Continue to work under contract with the FHCOC and/or other qualified fair housing service providers to provide fair housing services for all segments of the community. Evaluate and adjust the scope of services to ensure the County addresses any emerging trends in fair housing.	Annually	Countywide with emphasis on the North and Central County where there are concentrations of LMI households.	Serve 100 households through fair housing services annually.
	Provide federal/state/local information regarding discrimination to residents, including applicable Fair Housing Information and Discrimination Complaint Forms.			
	Maintain bilingual staff to assist non-English speaking families and ensure handicap accessible offices.			
	Work with the fair housing agencies to provide information and regarding housing discrimination and intervention to resolve complaints.			
	Use non-traditional media (e.g., social media, County website) in outreach and education efforts in addition to print media and notices.			
	Update the Affordable Housing Rental List (translated in multiple languages) on the County website.			
	Inform community members of the existence of the Orange County Fair Housing Council (FHCOC) and its oversight of fair housing practices by posting on the County's website and at the Planning counter.	By December 2025	Countywide	
	The County shall work with local resource agencies to implement an outreach program informing families within the county of housing and services available for persons with developmental disabilities.	Annually	Countywide with emphasis on North County Unincorporated areas.	Outreach to residents with the goal of serving 30 persons annually through services for persons with disabilities
Housing Mobility				
Program 2: Zoning Code Amendments	Allow emergency shelters without Use Permit or other discretionary permit in the commercial and industrial portions of the Housing Opportunities Overlay Zone.	By October 2024	Countywide	Revise the Zoning Code to allow emergency shelters without discretionary permit in the commercial and industrial portions of the

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
				Housing Opportunities Overlay Zone with the goal of initiating plans for a new emergency shelter.
	Remove the Site Development Permit requirement for multifamily developments of 1 to 4 units and any developments with 20% affordable units and allow by-right. Amend the Site Development Permit requirements for objective findings for developments of 5 units or more.			Facilitate the development of 8,122 units, including 4,494 affordable to lower-income households.
	Adopt Objective Design Standards (ODS).			
Program 3: Facilitate Affordable Housing Development	Review the County Housing Authority's participation in the Housing Choice Voucher Section 8 Rental Assistance Program and pursue additional vouchers/funding when available.	Annually	Countywide	Annually pursue additional funding for Section 8 Rental Assistance with the goal of increasing the number of voucher holders by 10% during the planning period.
	Work with applicants who propose for rent-residential projects to encourage four-bedroom units for large families as part of the proposed developments.	As proposals are received (ongoing)		Work with developers with the goal of developing of 50 units suitable for large households during the planning period.
	Meet with Developers and DPRC to identify potential constraints to the development of affordable housing and housing for those with special needs in the County's Zoning regulations.	Within 1 year of adoption Address within 6 months	Countywide	Facilitate the development of 8,122 units including 200 for persons with special needs (persons with disabilities, seniors, etc.).
Program 4: Coordination with Affordable Housing Stakeholders	Meet with owners of the religious properties identified in the inventory of sites and provide information on regulatory changes, development standards and affordability requirements and incentives and/or assistance available through the County for development of housing on religious institution properties.	By January 2025	Countywide	Initiate discussions of affordable housing development on religious properties with two owners during the planning period.
	Meet with non-profit developers and housing organizations to evaluate projects for acquisition and rehabilitation/new construction of new shelters, and long-term affordable housing, including senior housing.	Annually		Facilitate the development of 200 units for special needs populations (seniors, persons with disabilities, persons

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
				experiencing homelessness, etc.).
Program 8. AFFH	Review Definition of Single Housekeeping Unit. To promote flexibility to accommodate residents with different living conditions, the County will review and adopt revisions as appropriate to its zoning code to provide greater flexibility in consideration of accommodating a variety of household situations for related and unrelated individuals living together.	By December 2026	Countywide with emphasis on the Central County where populations of persons with disabilities are highest.	Facilitate the development of 50 units for persons with disabilities during the planning period.
	~~The County will revise the ordinances to allow all group and sober living homes as principally permitted uses in all mixed-use and multi-family zoning districts and to assure that any group home or sober living facility that operates as a single housekeeping unit are permitted in any zoning district. The definition of single housekeeping unit will be revised to eliminate the requirement that the residential activities occur on a nonprofit basis and that the residents share lease agreements or ownership. In addition, the standards for group and sober living homes in single family residential areas shall be objective and not unnecessarily constrain approval of group and sober living homes in that zoning district.~~ The County will review and may modify the group and sober living home ordinances in light of the decision in The Ohio House v. City of Costa Mesa, et al. Ninth Circuit Court of Appeals Case No. 22-56181 (December 4, 2024) and any subsequent relevant cases.	By July 2025		
	Seek State and Federal monies, as funding becomes available, for permanent supportive housing construction and rehabilitation targeted for persons with disabilities, including persons with developmental disabilities.	Annually		
	Develop a program /ordinance to provide regulatory incentives, such as expedited permit processing and fee waiver, to projects targeted for persons with disabilities, including persons with developmental disabilities.	Within 2 years of adoption of the Housing Element.		

	On an ongoing basis, enforce building code provisions requiring accessible design.	Annually		
	On an ongoing basis, implement the reasonable accommodation ordinance.			

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	On an ongoing basis, ensure the permitting requirements for group homes and care facilities for seven or more persons are consistent with State law and fair housing requirements.			
New Housing Opportunities in High Resource Areas				
Program 1: Provide Adequate Sites and Monitor for No Net Loss	Sites Rezoning – Amend the HOO to accommodate a higher density of development, establish a minimum density for R2, R3, R4, RP, and MX zones, rezone C1, C2, CC, CH, CN, RP to MX, and expand the HOO.	By July 2024	Housing Opportunities Overlay (HOO)	Make 150 sites available to accommodate the RHNA shortfall of 2,283 very low-, 1,624 low-, and 718 moderate-income units.
	No Net Loss – Identify and make available additional adequate sites to accommodate the share of housing need by income level.	Within 180 days, if required	Countywide	Ensure Housing Element sites are adequate to accommodate the RHNA and identify new sites, if necessary.
Program 3: Facilitate Affordable Housing Development	Review incentives for density bonuses, expedited permit processing procedures, development standards, tax-exempt conduit financing, infrastructure financing assistance, and direct financial assistance.	Every two years	Countywide	Ensure adequate sites remain available to accommodate 8,122 units during the planning period.
	Review with DPRC members the existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production.	Within 1 FY of approval		
	Review funding opportunities and aggressively pursue, as the County has been, all state and federal housing grant funds for which the County is eligible	Bimonthly		
	Approve affordable housing projects in Rancho Mission Viejo administratively.	Ongoing	Rancho Mission Viejo	
	Coordinate with the City of Newport Beach for development and shared RHNA credit of the identified parcels on the County-owned Coyote Canyon site.	By November 2024	Coyote Canyon site	
Program 7. Accessory Dwelling Units	Implement an informational program to disseminate information about developing ADUs.	Within 2 years of adoption Annually	Countywide with emphasis on the South County Unincorporated areas	Facilitate the development of 506 ADUs, including 336 affordable to lower-income households.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	Prepare pre-approved ADU plans.	July 2024		
	Implement the Affordable ADU Loan Program Policy Manual.	Within 2 years of adoption		
Program 10: Inclusionary Housing	Initiate consideration of an Inclusionary Housing Program/Policy.	By December 2026	Countywide with emphasis on the South County Unincorporated areas	Facilitate the development of 4,494 units affordable to low-income households (RHNA) including 75% in high or highest resource areas.
Program 11: Pursue Funding Sources To Achieve Housing Action Plan Goals	Leverage available funding sources such as Homekey funds to purchase or rehabilitate housing, including hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or permanent, long-term housing.	Annually	Countywide, with emphasis on Central County area where homeless populations are heightened	Facilitate the development of one interim or permanent, long-term housing project using funding sources such as Homekey funds during the planning period.
Place-based Strategies for Neighborhood Improvement				
Program 6. Rehabilitate and Preserve Existing Residential Units	Use available housing funding to finance housing rehabilitation.	Annually	Central and North County where aging units are more common	Assist 10 households through rehabilitation efforts annually.
	Implement and review the County's code enforcement and graffiti removal programs.	Ongoing		Facilitate 5 improvements annually through the code enforcement and/or graffiti removal programs.
	Provide infrastructure maintenance in existing residential neighborhoods, including through the Capital Improvement Program (CIP).	Annually	Countywide with emphasis on North and Central Orange County where opportunity sites for lower-income RHNA units have been identified.	Facilitate 10 infrastructure improvements, including 7 in the North and Central County Unincorporated areas during the planning period.
	Participate in the CDBG, HOME and related programs as a means of providing pass-through funding to affordable housing projects and efforts to rehabilitate existing affordable units or projects.	Annually	Central and North County where aging units are more common	Assist 10 households through rehabilitation efforts annually.
Program 8: AFFH	Adopt and implement an Environmental Justice (EJ) Element during the planning period.	By 2031	Countywide including actions targeting and benefiting North and Central County areas with worsened	Adopt an Environmental Justice Element during the planning period.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
			environmental conditions.	
Program 8: AFFH	Implement the County CIP plan including ADA, roadway, and infrastructure improvements in the Unincorporated County. Improvements may include: • Curb ramp, sidewalk, and driveway upgrades and improvements to satisfy current ADA standards and requirements. • Parkway, sidewalk, and intersection improvements.	Annually	Countywide with emphasis on North County where opportunities indices are lower.	Complete 10 CIP improvements annually including 3 in the North County area.
Program 8: AFFH	Facilitate the development or improvement of parks and open space under the County's CIP plan or other implementation plan benefiting residents of Unincorporated communities, particularly communities with reduced access to environmental opportunities. Projects may include: • Development of Mile Square Regional Park in Fountain Valley • Santa Ana River Trail • Ted Craig Regional Park improvements • Yorba Regional Park improvements	By 2031	North and Central County	Facilitate the development or improvement of 2 parks, open spaces, or recreational facilities during the planning period.
Tenant Protections and Anti-displacement				
Program 1: Provide Adequate Sites and Monitor for No Net Loss	Site Replacement – Comply with site replacement requirement pursuant to Government Code Section 65583.2(g)(3). Replace sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and: • Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or • Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or	As necessary (ongoing)	Countywide	Replace 100% of units for sites that meet the replacement requirement outlined in Program 1.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	• Occupied by low or very low-income households For the purpose of this program "previous five years" is based on the date the application for development was submitted.			
Program 6. Rehabilitate and Preserve Existing Residential Units	Monitor projects with expiring affordability covenants and take appropriate action to preserve these affordable units whenever possible. Promote funding and other opportunities to owners considering conversion of units through existing outreach programs and the County's website. Enforce the provisions of the County's condominium and mobile home park conversion ordinance.	Annually	Countywide	Preserve affordability of all 1.051 affordable units in the County.
Program 11: Pursue Funding Sources To Achieve Housing Action Plan Goals	Facilitate the development of one interim or permanent, long-term housing project using available funding sources such as Homekey funds (provided it is made available through the State) during the planning period which is anticipated to assist 50 persons experiencing homelessness annually.	Annually	Countywide, targeting the Central County area where homeless populations are heightened.	Assist 50 persons experiencing homelessness annually.

Program 9: Energy Conservation in Residential Developments

State law requires that jurisdictions analyze opportunities for energy conservation in residential development as part of their Housing Element review process. Controlling energy costs is one key component of the larger housing affordability issue.

Title 24 sets forth mandatory energy standards and requires the adoption of an "energy budget" for all new residential buildings and additions to residential buildings. Separate requirements are adopted for "low-rise" residential construction (i.e., no more than 3 stories) and non-residential buildings, which includes hotels, motels, and multifamily residential buildings with four or more habitable stories. The standards specify energy saving design for lighting, walls, ceilings, and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards and the use of non-depleting energy sources, such as solar energy or wind power. The home building industry must comply with these standards while localities are responsible for enforcing the energy conservation regulations through the plan check and building inspection processes.

In addition to architectural and construction techniques, thoughtful land use planning provides additional opportunities for energy savings. Examples of the County's energy-saving land use strategies include higher density along transit routes and close to employment centers and infill development. The Housing Opportunities Overlay Zone advances this goal, as does the County's long history of approving balanced communities such as Ladera Ranch and Rancho Mission Viejo planned communities.

Objectives:

- Review and update annually information on the County's website relating to energy conservation.
- On an ongoing basis, provide information regarding energy efficiency measures in the Orange County Housing Opportunities (HOO) Manual. Review and update manual annually related to energy conservation and on an ongoing basis provide manual online and at the County Service Center.
- On an ongoing basis, provide clients and the Development Processing Review Committee (DPRC), with information regarding "CalGreen" – California's Green Building Code. Review and annually update information on the County's website and at the County Service Center relating to the Green Building Code.
- On an ongoing basis provide sustainable provisions from the Board adopted Comprehensive Zoning Code Update to property owners online and at the County Service Center. Update information annually.

Responsible Agencies: OC Development Services

Funding Sources: General Fund and Utilities

Timeframe: Initiate annual website reviews and updates: January 2025; Update HOO Manual: Completed July 2024.

Program 10: Inclusionary Housing Program

An inclusionary housing program could boost production of homes for households earning 50% or less of the median income.

Objectives:

- Initiate consideration of an Inclusionary Housing Program (IHP) by 2026 to expand affordable housing options by considering a set aside of a certain number of units for households earning 50% or less of the median income. The County ordinance may propose that this affordable requirement could be provided either on-site, off-site, or through the payment of an in-lieu fee or provision of land. The in-lieu fee option would be intended primarily for small to midsize in-fill developments or subdivisions where insufficient land exists to provide both for-sale and rental units.

Responsible Agency: OC Development Services

Funding Sources: General Fund

Timeframe: Initiate IHP consideration; January 2026

Program 11: Pursue Funding Sources to Achieve Housing Action Plan Goals

The County has access to a variety of funding sources to provide adequate supply of decent and affordable housing and to accomplish the goals and strategies set forth in the Housing Action Plan. Facilitate the development of one interim or permanent, long-term housing project using available funding sources such as Homekey funds (provided it is made available through the State) during the planning period which is anticipated to assist 50 persons experiencing homelessness annually. Leverage available funding sources such as Homekey funds to purchase or rehabilitate housing, including hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or permanent, long-term housing.

a. Federal Resources

HOME Funds

The HOME Investment Partnership (HOME) Program is a federal program, created as a result of the National Housing Affordability Act of 1990. Under HOME, HUD awards funds to localities on the basis of a formula that takes into account tightness of the local housing market, inadequate housing, poverty, and housing production costs. Localities must qualify for at least $500,000, based on HUD's distribution formula, to receive direct allocation of funds, or can apply to the state or combine with adjacent jurisdictions.

HOME funding is provided to jurisdictions to assist either rental housing or homeownership through acquisition, construction, reconstruction, and/or rehabilitation of affordable housing. Also possible is tenant based rental assistance, property acquisition, site improvements, and other expenses related to the provision of affordable housing and for projects that serve a group identified as having a special need related to housing. The local jurisdiction must make matching contributions to affordable housing under HOME.

Community Development Block Grant Program (CDBG)

Through the federal CDBG program, HUD provides funds to local governments for funding a range of community development activities. For housing purposes, CDBG funds can be used for single and multifamily rehabilitation, rental housing acquisition or homeownership assistance, and other activities that support new housing construction (such as acquisition of property). CDBG grants benefit primarily persons/households with incomes not exceeding 80% of the County Median Family Income.

Section 108 Program

Section 108 is the loan guarantee provision of the CDBG program. This provision provides communities with a source of financing for a variety of housing and economic development activities. All rules and requirements of the CDBG program apply, and therefore all projects and activities must principally benefit low- and moderate-income persons, aid in the elimination or prevention of blight, or meet urgent needs of the community.

Monies received under the Section 108 loan guarantee program are limited to not more than 5 times the applicant's most recently approved CDBG amount, less prior Section 108 commitments. Activities eligible for these funds include economic development activities eligible under CDBG; acquisition of real property; rehabilitation of publicly-owned property; housing rehabilitation eligible under CDBG; construction, reconstruction, or installation of public facilities; related relocation, clearance or installation of public facilities; payment of interest on the guaranteed loan and issuance costs of public offerings; debt service reserves; and public works and site improvements.

Section 108 loans are secured and repaid by pledges of future and current CDBG funds. Additional security requirements may also be imposed on a case by case basis.

Mortgage Credit Certificate Program

Under the Mortgage Credit Certificate (MCC) Program, first-time homebuyers receive a tax credit of up to 15% of the mortgage interest paid for the year based on a percentage of the interest paid on their mortgage. This credit typically amounts to $80 to $125 month. This tax credit allows the buyer to qualify more easily for home loans as it increases the effective income of the buyer. Under federal legislation, 20% of the allocation must be set-aside for first time homebuyers with incomes between 75% and 80% of the County median income. This program may be used alone or in conjunction with a Down Payment Assistance Loan. The mortgage tax credit allows participants to meet monthly housing costs for households unable to meet monthly market-level payments. Additionally, lenders may write down the cost of the mortgage based on the value of the credit.

For the 2013-2021 planning period, the County financed thirty-one (31) homes through the CEO's first-time homebuyer program for low-income and moderate-income Orange County residents.

Housing Choice Voucher Section 8 Housing and Continuum of Care/ Certificates Grant Programs

The Housing Choice Voucher Section 8 Program and Continuum of Care/Certificate Grants provide monthly housing assistance payments to owners of rental properties in order to assist extremely low and very low-income families, elderly, and disabled persons with their rent. Housing Choice Voucher participants can choose any housing that meets the requirements of the program and are not limited to units located within subsidized housing projects. The Orange County Housing Authority (OCHA) administers Housing Choice Voucher Program within the Unincorporated Orange County area (as well as 31 of the 34 cities in Orange County). The rental assistance represents the difference between 30% of the recipients' adjusted monthly income and the federally approved Fair Market Rents (FMR), locally established Payment Standards or the owner's Gross Rent; whichever is less. In general, the FMR for an area represents the 40th percentile of median rents in a designated local metropolitan area. These programs are designed to utilize privately owned, decent, safe, and sanitary rental housing and assistance is available in the following forms:

- Continuum of Care/ Housing Certificate Program. This program is funded with annual renewal grants to assist homeless/disabled individuals who are qualified and referred to the Housing Authority through the Orange County Coordinated Entry System (CES). Under the certificate program, the property owner selects an

eligible tenant and enters into a contract with the Orange County Housing Authority that establishes the total rent, following an inspection and approval of the rental property. The actual approved rent cannot exceed contract rents for non-assisted units comparable units in the area as determined by Rent Reasonableness. Once approved, eligible tenants must pay the highest of either 30% of adjusted income or 10% of gross income. Housing subsidized through this program must meet Federal Housing Quality Standards established by HUD.

- Housing Choice Voucher Program (HCVP). This program is the largest tenant-based housing program and also includes Special Purpose Vouchers reserved for specific populations including the Veterans Administration Assisted Housing (VASH), Non-Elderly Disabled (NED), Family Unification (FUP), Project-based Vouchers (PBV), Mainstream and Homeownership programs. HCVP is similar to the Certificate Program and requires Housing Quality Standards inspections and the Rent Reasonableness to determine the approvable contract rent. However, the Housing Authority is able to establish Payment Standards which may be 90% to 110% of the published Fair Market Rents. The monthly Housing Assistance Payment (HAP) is determined by subtracting 30% of the tenant's adjusted income from the approved Gross Rent or Payment Standard (whichever is less). Overall rents are not restricted to the Fair Market Rents and a tenant is allowed to pay up to 40% of income if they choose a rental property that has a higher rent than the Payment Standard. If the contract rent is increased after the first year and the unit meets Rent Reasonableness, assisted tenants are allowed to pay a higher portion of their income if they choose to remain in the rental property rather than move to a lower cost unit.

Section 202/811 Housing for Elderly or Handicapped Housing

Under this federally administered program, direct loans are made to eligible, private nonprofit organizations and consumer operative sponsors to finance development of rental or cooperative housing facilities for occupancy by elderly or handicapped persons. The interest rates on such loans are determined annually. Section 8 funds are made available for all of the Section 202 units for the elderly. Rental assistance for 100% of the units for handicapped persons has also recently been made available. Section 811 can be used to develop group homes, independent living facilities, and intermediate care facilities.

Private, nonprofit sponsors may qualify for Section 202 no-interest capital financing loans. Households of one or more persons, the head of which is at least 62 years old or is a qualified non-elderly handicapped person between the ages of 18 and 62, are eligible to live in these units.

Housing Opportunities for Persons with AIDS (HOPWA)

The federally administered HOPWA program provides entitlement and competitive grants for housing assistance and supportive services for persons with AIDS. Funds can be used for:

- Acquisition, rehabilitation, lease, and repair of facilities
- New construction
- Project-based or tenant-based rental assistance
- Planning and support services
- Operating costs
- Short-term rent, mortgage, and utility payments
- Administrative expenses

Supportive Housing

The Supportive Housing Programs provide grants to public and private non-profit entities to promote the development of supportive housing and services. These grants are disbursed by HUD. Funds may be used for: acquisition of property; rehabilitation; new construction (under certain limitations); leasing of structures; operating and supportive services costs; and rental assistance.

Federal Emergency Solutions Grants (FESG)

This federal program provides grants to (1) engage homeless individuals and families living on the street, (2) improve the number and quality of emergency shelters for homeless individuals and families, (3) help operate these shelters, (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. Metropolitan cities, urban counties and territories may provide ESG funds to projects operated by units of general-purpose local government or private nonprofit organizations.

b. State Resources and Programs

Affordable Housing and Sustainable Communities Program (AHSC)

This state program is administered by the Strategic Growth Council and implemented by the California Department of Housing and Community Development (State HCD). The AHSC Program funds land-use, housing, transportation, and land preservation projects to support infill and compact development that reduce greenhouse gas (GHG) emissions. Funding for the AHSC Program is provided from the Greenhouse Gas Reduction Fund (GGRF), an account established

to receive Cap-and-Trade auction proceeds. The AHSC Program will assist project areas by providing grants and/or loans, or any combination thereof, that will achieve GHG emissions reductions and benefit Disadvantaged Communities through increasing accessibility of affordable housing, employment centers, and key destinations via low-carbon transportation resulting in fewer vehicle miles traveled (VMT) through shortened or reduced trip length or mode shift from Single Occupancy Vehicle (SOV) use to transit, bicycling, or walking.

CALHOME

CalHome enables low- and very low-income households to become or remain homeowners. Eligible activities include predevelopment, site development, and site acquisition for development projects; rehabilitation and acquisition and rehabilitation of site-built housing, and rehabilitation, repair, and replacement of manufactured homes; and down payment assistance, mortgage financing, homebuyer counseling, and technical assistance for self-help.

California Emergency Solutions And Housing (CESH)

CESH Program provides funds for a variety of activities to assist persons experiencing or at risk of homelessness as authorized by SB 850 (Chapter 48, Statues of 2018). State HCD administers the CESH Program with funding received from the Building Homes and Jobs Act Trust Fund (SB 2, Chapter 364, Statutes of 2017). CESH funds may be used for five primary activities: housing relocation and stabilization services (including rental assistance), operating subsidies for permanent housing, flexible housing subsidy funds, operating support for emergency housing interventions, and systems support for homelessness services and housing delivery systems. In addition, some administrative entities may use CESH funds to develop or update a Coordinated Entry System (CES), Homeless Management Information System (HMIS), or Homelessness Plan.

Golden State Acquisition Fund (GSAF)

GSAF combined with matching funds, makes up to five-year loans to developers for acquisition or preservation of affordable housing.

HOMEKEY

Homekey funds will be made available to purchase and rehabilitate housing, including hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or permanent, long-term housing. Awarded funds must be used to provide housing for individuals and families experiencing homelessness or at risk of experiencing homelessness and who are impacted by the COVID-19 pandemic.

Eligible activities include acquisition or rehabilitation of motels, hotels, or hostels; master leasing of properties; acquisition of other sites and assets, including purchase of apartments or homes, adult residential facilities, residential care facilities for the elderly, manufactured housing, and other buildings with existing residential uses that could be converted to permanent or interim housing; conversion of units from nonresidential to residential in a structure with a certificate of occupancy as a motel, hotel, or hostel; purchase of affordability covenants and restrictions for units; relocation costs for individuals who are being displaced as a result of rehabilitation of existing units; and capitalized operating subsidies for units purchased, converted, or altered with funds provided pursuant to Health and Safety Code (HSC) section 50675.1.1.

Infill Infrastructure Grant Program (IIG)

The purpose of the IIG Program is to promote infill housing development by providing financial assistance for Capital Improvement Projects that are an integral part of, or necessary to facilitate the development of, a Qualifying Infill Project or a Qualifying Infill Area. To be eligible for funding, a Capital Improvement Project must be an integral part of, or necessary for the development of either a Qualifying Infill Project or housing designated within a Qualifying Infill Area. Eligible costs include the construction, rehabilitation, demolition, relocation, preservation, and acquisition of infrastructure.

Joe Serna, Jr. Farmworker Housing Grants (FWHG)

FWHG funds are to be used to finance the new construction, rehabilitation, and acquisition of owner-occupied and rental units for agricultural workers, with a priority for lower-income households. Activities incurring costs in the development of homeowner or rental housing for agricultural workers, including land acquisition, site development, construction, rehabilitation, design services, operating and replacement reserves, repayment of predevelopment loans, provision of access for the elderly or disabled, relocation, homeowner counseling, and other reasonable and necessary costs are eligible.

Local Early Assistance Program (LEAP)

The Local Early Assistance Program (LEAP) provides grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that accelerate housing production, and /or facilitates compliance to implement the 6th cycle Regional Housing Needs Assessment.

Local Housing Trust Fund (LHTF)

LHTF assistance is to be used to provide matching funds to local and regional housing trust funds dedicated to the creation, rehabilitation, or preservation of affordable housing, transitional

housing, and emergency shelters. Eligible Activities include Loans for acquisition, predevelopment expenses and development of affordable rental housing projects, transitional housing projects, emergency shelters and homeownership projects, including down payment assistance to qualified first-time homebuyers, and for rehabilitation of homes owned by income-eligible homeowners. No more than 20% of each allocation may assist moderate-income households, and at least 30% of each allocation is required to assist extremely low-income households.

Multifamily Housing Program (MHP)

MHP funds are to assist the new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower-income households. Senate Bill 3 (Chapter 365, Statues 2017) authorized the Veterans and Affordable Housing Bond Act of 2018 (Proposition 1). This measure was adopted by voters on November 6, 2018. It authorizes the issuance of bonds in the amount of $1.5 billion for the Multifamily Housing Program (MHP). California Department of Housing and Community Development (HCD) has developed draft MHP guidelines and is seeking feedback from stakeholders and interested parties.

Eligible Activities include new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing, and the conversion of nonresidential structures to rental housing. Projects are not eligible if construction has commenced as of the application date, or if they are receiving 9% federal low-income housing tax credits.

MHP funds will be provided for post-construction permanent financing only. Eligible costs include the cost of child care, after-school care, and social service facilities integrally linked to the assisted housing units; real property acquisition; refinancing to retain affordable rents; necessary on-site and off-site improvements; reasonable fees and consulting costs; and capitalized reserves.

National Housing Trust Fund (NHTF)

NHTF funds assist in new construction of permanent housing for extremely low-income households. Eligible activities are to be used for new construction. Applicants include individuals, joint ventures, partnership, limited partnerships, trusts, corporations, limited liability corporations, local public entities, duly constituted governing body of Indian Reservations or Rancherias or other legal entities or any combination thereof that meet program requirements.

Pet Assistance And Support Program (PAS)

PAS provides funding for qualified homeless shelters to provide shelter, food, and basic veterinary services for pets owned by individuals experiencing homelessness, along with staffing and liability insurance related to providing those services. Eligible uses include shelter, food, and

basic veterinary services for pets owned by individuals experiencing homelessness, along with staffing and liability insurance related to providing those services.

Permanent Local Housing Allocation (PLHA)

The purpose of PLHA funds is to provide a permanent source of funding to all local governments in California to help cities and counties implement plans to increase the affordable housing stock. Funds will help to increase the supply of housing for households at or below 60% of area median income; increase assistance to affordable owner-occupied workforce housing; assist persons experiencing or at risk of homelessness; facilitate housing affordability, particularly for lower- and moderate-income households; promote projects and programs to meet the local government's unmet share of regional housing needs allocation; and ensure geographic equity in the distribution of the funds.

Regional Early Action Planning Grants (REAP)

This program allows councils of governments (COGs) and other regional entities to collaborate on projects that have a broader regional impact on housing. Grant funding is intended to help regional entities and governments facilitate local housing production that will assist local governments in meeting their Regional Housing Need Assessment (RHNA).

TRANsitional Housing Program (THP)

When left without support or resources, young adults aged 18 to 25 years ("transition age youth") can face huge barriers to finding safe, affordable homes. As a result, many of these youth are at extreme risk of falling into homelessness. THP provides funding to counties for child welfare services agencies to help young adults aged 18 to 25 years find and maintain housing, with priority given to those formerly in the foster care or probation systems. (SB 80, Statutes of 2019). Funds shall be used to help young adults who are 18 to 25 years of age secure and maintain housing. Use of funds may include, but are not limited to, identifying, and assisting housing services for this population within each community; helping this population secure and maintain housing (with priority given to those formerly in the state's foster care or probation system); improving coordination of services and linkages to community resources within the child welfare system and the Homeless Continuum of Care; and outreach and targeting to serve those with the most-severe needs.

Veterans Housing And Homelessness Prevention Program (VHHP)

VHHP funds are to be used for acquisition, construction, rehabilitation, and preservation of affordable multifamily housing for veterans and their families to allow veterans to access and maintain housing stability. Funds must be used to serve veterans and their families with at least

50% of the funds awarded shall serve veteran households with extremely low-incomes. Of those units targeted to extremely low-income veteran housing, 60% shall be supportive housing units.

California Housing Finance Agency (CalHFA)

CalHFA offers a variety of loan programs with competitive rates and long-term financing to advance the creation and preservation of affordable housing.

- Permanent Loan Program: CalHFA's Taxable, Tax-Exempt, or CalHFA funded Permanent Loan programs provide competitive long-term financing for affordable multifamily rental housing projects. Eligible projects include newly constructed or acquisition/rehabilitation developments that provide affordable housing opportunities for individuals, families, seniors, veterans, and special needs tenants.

- Conduit Issuer Program: The Conduit Issuer Program is designed to facilitate access to tax-exempt and taxable bonds by developers that seek financing for eligible projects that provide affordable multifamily rental housing for individuals, families, seniors, veterans, or special needs tenants. The conduit bonds may be used to finance the acquisition, rehabilitation, and/or development of an existing project, or they can be used for the construction of a new project.

- Mixed-Income Program: The CalHFA Mixed-Income Program provides competitive long-term subordinate financing for new construction multifamily housing projects restricting units between 30% and 120% of county Area Median Income.

CalHFA offers a variety of loan programs to help California residents purchase a home.

  - California Dream For All Shared Appreciation Loan: The Dream For All Shared Appreciation Loan is a down payment assistance program for first-time homebuyers to be used in conjunction with the Dream For All Conventional first mortgage for down payment and/or closing costs.

Low-Income Housing Tax Credit (LIHTC) Program and Tax-Exempt Bond Financing

The LIHTC financing program subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low- and moderate-income tenants. Through the tax credit program, private investors make cash investments in return for reductions in tax liabilities from the state and/or federal government. The 9% tax credit program is highly competitive and is combined with taxable hard debt. The 4% tax credit program is combined with tax-exempt bonds, which

now has a competitive process for the allocation. This is a complex and competitive financing program, but critical to the long-term financing of affordable/supportive housing developments. Typically, 30% to 50% of total funding needed for a housing development is provided through the federal and state LIHTC financing programs. Local funding must be contributed in order for developers to be competitive in obtaining tax credit and bond financing.

According to the California Tax Credit Allocation Committee, there are 175 LIHTC developments in Orange County, some of which are designated for specific populations. These developments include 15,092 low-income units, with 2 reserved for At-Risk populations, 79 for large families, 30 Non-Targeted, 46 for Seniors, 8 for Special Needs populations, 4 Single Room Occupancy (SRO), and 6 which are not categorized. There are no active LIHTC developments in La Habra, Laguna Niguel, or Rancho Santa Margarita.

California Mental Health Services Act (Proposition 63 of 2004)

The passage of Proposition 63 (now known as the Mental Health Services Act or MHSA) in November 2004, provides the first opportunity in many years for the California Department of Mental Health (DMH) to provide increased funding, personnel and other resources to support county mental health programs and monitor progress toward statewide goals for children, transition age youth, adults, older adults and families. The Act addresses a broad continuum of prevention, early intervention and service needs and the necessary infrastructure, technology and training elements that will effectively support this system.

This Act imposes a 1% income tax on personal income in excess of $1 million. Statewide, much of the funding is provided to county mental health programs to fund programs consistent with their local plans. MHSA funding has been approved to facilitate development, acquisition, or rehabilitation of permanent supportive housing for the target population.

c. Local and Private Resources and Programs

Redevelopment Tax Increment Funds

On December 29, 2011, the California Supreme Court (the Court) issued its opinion in *CRA v. Matosantos*, regarding the constitutionality of AB1X 26 & 27. In their opinion, the Court upheld the provisions of AB1X 26, effectively eliminating redevelopment agencies statewide, but struck down AB1X 27 the legislation that would have allowed redevelopment agencies to continue so long as they provided payments to the State. Pursuant to California Health & Safety Code Section 34170 et seq., the Orange County Development Agency was officially dissolved on February 1, 2012. As a result of that action, redevelopment funds are no longer available as leverage for use with CDBG and/or HOME funds. A Housing Successor Agency (HSA) was

established to wind down all remaining financial obligations of the Orange County Development Agency (OCDA).

Affordable units produced or substantially rehabilitated through support by the former Orange County Development Agency's Housing Set Aside Fund from 2006 to 2020 are identified in **Table 5-4**:

Table 5-4
Affordable Housing Assisted with Former OCDA Funds – 2006-2020

Project Description	OCDA Restricted Units	Total New Units Produced
Cornerstone Apartments	37	48
Bonterra Apartment Homes	82	94
Stonegate I Apartments	27	38
Stonegate II Apartments	15	38
Avenida Villas	17	29
Dorado Senior Apartments	103	150
Montecito Vista Apartments	11	162
Stratford Place and Windsor Court	85	86
Granite Court Apartments	24	71
Woodbury NE Apartments	62	150
Buena Vista Apartments	17	17
Potter's Lane	15	15
Placentia Veterans Village	24	24
Della Rosa	24	50
Oakcrest Heights	3	54
Salerno at Cypress Village	25	25
Total	**571**	**1,051**
Source: OC Community Resources, 2023		

Based on the uncertainty of the HSA funds, and the ability to monitor and maintain the existing HSA assets, it is unknown how many new affordable units will be created through HSA funds in the future.

Kennedy Commission

The Kennedy Commission is a community-based non-profit formed in 2001 as an all-volunteer organization. The focus of this group is to develop housing solutions that affirm the dignity of families with very low- and extremely low-incomes and unites communities across Orange County to develop homes affordable to all.

Orange County Housing Trust (OCHT)

OCHT is a fully qualified 501(c)(3) nonprofit private capital-funded trust dedicated to increasing the supply and availability of permanent supportive housing units and affordable housing developments in Orange County to prevent homelessness. With renewed interest to solve the homelessness crisis in Orange County, Orange County Business Council approached NeighborWorks Orange County to work together to retool OCHT and seek donations from the private sector interested in making a difference. Their focus is to provide gap financing for the acquisition, development, or construction of supportive and affordable housing projects for developers who share our vision of ending homelessness in Orange County. In March 2023, the OCHFT was awarded a $4 million grant from CalOptima Health for the purpose of creating and operating an ADU Loan program. The program is designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences in aims to expand access to income opportunities for homeowners while also providing much needed affordable rentals exclusively for very low-income tenants with a priority on Section 8 voucher holders.

Housing Funding Strategy

The 2018 Orange County Housing Funding Strategy (2018 Strategy) outlines a bold vision of the creation of 2,700 supportive housing units over seven years (through 2025) as well as a need to create additional affordable housing. Investments in housing developments throughout Orange County have been an urgent priority and there has been catalytic investment in supportive housing opportunities over the last four years.

In December 2022, the Board received and filed the 2022 Orange County Housing Funding Strategy Update (HFS Update) which is based on the 2022 Point In Time (PIT) Count and maps out the progress that has been made toward the 2,700 unit goal under the 2018 Strategy, as well as provides an analysis of federal, state, and local resources available to produce affordable and supportive housing. The HFS Update further outlines the recommendations for a strategic approach to achieve an updated goal of developing 2,396 supportive housing units from 2022 to 2029. Orange County's strategic responses to homelessness and the California housing crisis is seen in the considerable progress that has been made in supportive and affordable housing production locally. In addition, the HFS Update provides an overview of current development costs, which rose significantly over the last four years, as well as the success of the County in leveraging of locally invested resources to create new supportive housing as well as general affordable housing in the region.

Orange County Housing Finance Trust (OCHFT)

The Orange County Housing Finance Trust (OCHFT) was formed in 2019 as a joint powers authority between the County of Orange and the cities throughout the county. OCHFT was

created for the purpose of funding housing, specifically assisting persons experiencing homelessness and persons and families of extremely low-, very low-, and low-income within the Orange County.

Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family size and requires U.S. citizenship and specified categories of non-citizens who have eligible immigration status. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live. By law, a PHA must provide 75 % of its voucher to applicants whose incomes do not exceed 30 % of the area median income. Median income levels are published by HUD and vary by location.

County's Mortgage Assistance Program

The County's Mortgage Assistance Program (MAP) provides silent (deferred payment) down payment assistance loans to assist low-income first-time homebuyers (FTHB). Eligible FTHB's annual income must not exceed 80% of the Area Median Income (AMI). The loans are designed to help with the down payment to purchase a home. The 3% simple interest, deferred payment loan has a 30-year term and a maximum loan amount of $80,000. Homebuyers must occupy the property as their primary residence. There is a 1% minimum down payment requirement for this program and the total sales prices shall not exceed 85% of the Orange County median sales price for all homes. All applicants are required to attend a homebuyer education workshop. This program is available to eligible families in the Unincorporated County areas and in several participating cities.

Updated MAP policies and guidelines were approved by the Board of Supervisors on August 25, 2020. Eleven (11) households received a loan from the MAP during the 2013-2021 planning period.

Summary of Quantified Objectives

The following tables summarize the quantifiable objectives arising from the various programs.

1. New Construction

The County's quantified objectives for new construction are shown in **Table 5-5** and reflects the remaining RHNA after accounting for projects developed or under development and projected ADU development. It should be noted that achievement of these objectives will be dependent on many factors beyond the County's control, such as funding availability, interest rates, and general economic conditions.

Table 5-5
New Construction
Quantified Objectives Summary 2021-2029

Program	Extremely Low	Ex/Very Low	Low	Moderate	Above Moderate	Total
Objective	1,450 units	1,450 units	1,624 units	1,876 units	1,553 units	7,953 units

2. Rehabilitation

The County's rehabilitation program was inactive during 2014-2022. OC Community Resources is continuing to work towards the development of a new single-family rehabilitation program for Unincorporated Orange County.

3. Preservation/Assistance

The County's objectives for preservation and assistance programs are shown in **Table 5-6**.

Table 5-6
Preservation and Assistance
Quantified Objectives Summary, 2021-2029

Program	Extremely Low	Very Low	Low	Moderate	Above Moderate	TOTAL
Continuum of Care (CoC)[1]	526	45	0	0	0	571
Housing Choice Vouchers (HCV)[1]	10,065	32	0	0	0	10,097
TOTAL	**10,591**	**77**	**0**	**0**	0	**10,668**

[1]CountywideSource: OC Community Resources 2021. Projected number of occupancy units is the average between projected and actual active CoC and HCV Program participants from the previous period (2013-2021).

APPENDIX A: EVALUATION OF THE 2013-2021 HOUSING ELEMENT

Section 65588(a) of the *Government Code* requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This appendix contains a review the housing goals, policies, and programs of the previous Housing Element and evaluates the degree to which these programs have been implemented during the previous planning period, 2013 through 2021. The findings from this evaluation have been instrumental in determining the County's Housing Action Plan.

A. Program Evaluation

Table A-1 summarizes the County's accomplishments in implementing the programs contained in the previous Housing Element. **Table A-2** shows units built from January 1, 2013 through December 2021. Accessory dwelling units and market-rate apartments have been assigned to the low-income category based on prevailing rents. **Tables A-3** and **A-4** summarize the County's progress in meeting the quantified objectives from the previous Housing Element. For new construction, only units with affordability covenants have been included in the very low and low categories.

Special Needs Accomplishments

The County 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 5th Cycle, the County completed a number of key programs to support housing opportunity and made substantial progress towards many of its programs. The County's successful programs have been identified as continued or modified for the 6th Cycle, due to their success in the 5th 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 County's prior program accomplishments, achievements related to special needs populations are summarized below:

Seniors

According to recent American Community Survey estimates, there were 27.4% of owner households and 16.3% of renter households in Unincorporated Orange County where the householder was 65 or older. The housing needs of this group can be addressed through smaller units, accessory dwelling units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs.

Senior housing projects are a permitted use within any residential zoning district. The Zoning Code also provides a density bonus for the construction of senior housing projects.

Additionally, the Section 8 Housing Choice Voucher Programs (administered by the Orange County Housing Authority or OCHA) and Continuum of Care/Shelter Plus Care Certificate Grants provide monthly housing assistance payments to owners of rental properties in order to assist extremely low and very low-income families, elderly, and disabled persons with their rent. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.

Persons with Disabilities

As shown in Section 2, disabilities are relatively rare within Orange County in the under 65 age groups – typically 2% or less of the population. However, among seniors the incidence of disabilities increases significantly. Nearly 18.7% of persons in this age group reported an ambulatory difficulty, while more than 14% had an independent living difficulty.

The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.

Large Households

Large households are defined as those with five or more members. About 16% of renter households and about 15% of owner households within Unincorporated Orange County had five or more members. This data, together with overcrowding statistics, indicates that although a large proportion of households are small, there is a significant need for large rental units with four or more bedrooms.

Orange County worked with developers during the 5th Cycle to identify constraints and discuss strategies to incorporate large family units. Additionally, the County worked with developers to identify constraints to providing family units and how best to address them. The Orange County Housing Opportunities Overlay Zone provides incentives for the development of affordable housing on commercial sites in the Unincorporated County by providing administrative approval of entitlements and by-right development.

Farm Workers

As previously discussed, farm workers are not a significant portion of the Unincorporated Orange County community. Recent Census Bureau estimates reported about 5,000 persons employed in agricultural occupations in Orange County. About 6% of those farm workers live in Unincorporated County areas.

Their needs are accommodated through housing programs and policies that assist lower-income households in general rather than specialized programs, such as:

- Strategy 2a (rehabilitate deteriorated units). The County utilizes Federal Community Development Block Grant (CDBG) and State CalHome Funds to assist low-income households with needed repairs to their homes.
- Strategy 1a (encourage affordable housing opportunities). The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.
- Strategy 1f (support development of permanent supportive and transitional housing).

Single-Parent Households

For Orange County as a whole, single parents represent 5.2% of householders, according to 2019 ACS 5-Year Estimates. There are 41,777 single-mother households and 12,508 single-father households in Orange County (4% and 1.2%, respectively).

The County amended its Housing Opportunities Overlay Zone regulations in 2009 to provide incentives for the inclusion of child care facilities within affordable housing developments.

Single-room occupancy (SRO) units often provide a more affordable housing option for single-parent households which shared facilities to cut down on expenses and other costs. One SRO-type facility has been built in the Unincorporated County areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Persons Experiencing Homelessness

The County has estimated the number of homeless persons in the Unincorporated County areas based on the data collected in the 2019 Point-In-Time (PIT) Count. As of 2019, there were approximately 43 individuals experiencing homelessness in the Unincorporated County areas, in shelter programs and on the streets and places not meant for human habitation.

- The County achieved the following milestones within the County's 10-Year Plan to End Homelessness (Ten-Year Plan):In May 2016, the Board of Supervisors created the Office of Care Coordination to engage the entire Orange County region by working with cities and community-based organizations to coordinate public and private resources to meet the needs of the homeless population in Orange County and improve the overall countywide response to homelessness. October 2016, the Director of Care Coordination produced an Assessment of Homeless Services in Orange County that outlined findings, recommendations, and next steps for Orange County. This Assessment served as the next steps and measured the progress to date of the Ten-Year Plan.
- In April 2018, the Director of Care Coordination presented an update to the Assessment of Homeless Services in Orange County and provided next steps to building the County's System of Care, which promotes regional collaboration and coordination to meet the unique needs of people experiencing homelessness in Orange County.
- In November 2019, the Board approved a re-organization that consolidated the Office of Care Coordination and the Homeless Services unit into one, allowing for the better operationalization of policy to effectively address homelessness.
    - As of January 2021, a network of nonprofit organizations and local governments operates 59 emergency shelter programs (including those operating in response to COVID-19), 42 transitional housing programs, and 31 permanent supportive housing programs within the Orange County region. Specifically, the County, individual jurisdictions, and numerous agencies oversee a total of 2,857 beds in emergency shelters, 899 beds in transitional housing shelters and 2,602 beds in permanent supportive housing settings. Currently, 646 permanent supportive housing and affordable housing units are under development.

Unlike cities, the County plays a regional role in providing services to persons and families experiencing homelessness. The County-contracted facilities, such Bridges at Kraemer Place and the Yale Navigation Center that provides emergency shelter for adults experiencing homelessness, is located outside of the County's jurisdictional boundary but serves individuals from throughout the County, including the Unincorporated areas. In addition, the Orange County

Office of Care Coordination coordinates the grant application process through which local homeless service providers receive over $23 million in federal funding annually for the Continuum of Care Program. The Orange County Office of Care Coordination also serves as the administrative entity for the Orange County Continuum of Care for State funding to address homelessness.

Additionally, the County funds the operations of two year-round emergency shelter programs for individuals experiencing homelessness, Bridges at Kraemer Place, and the Yale Navigation Center. Bridges at Kraemer Place provides 200 beds of emergency shelter in the North Service Planning Area and the Yale Navigation Center provides 425 beds of emergency shelter in the Central Service Planning Area. Both programs have a large emphasis on housing focused case management and supporting participants in accessing needed resources and supportive services to assist them in securing appropriate housing options. The County is committed to supporting cities that operate their own emergency shelters and promoting coordination to increase access to shelter beds amongst the unsheltered population. There is one year-round program located in the Unincorporated County. American Family Housing leases space to the Illumination Foundation for the provision of 18 transitional housing units in Midway City.

Extremely low-income households

To calculate projected housing needs of the 6th Cycle, jurisdictions are to assume 50% of its very low-income regional housing need are extremely low-income households. As a result, from the very low-income need of 46,416 units, Orange County as a whole, has a projected need of 23,208 units for extremely low-income households. The projected need for low-income households in the Unincorporated County areas is 3,107. Thus, applying this same assumption to the Unincorporated County areas, the projected need for extremely low-income households is 1,554.

The Housing Action Plan Strategy addresses the needs of extremely low-income households. However, it must be recognized that the development of new housing for the lowest income groups typically requires large public subsidies, and the level of need is greater than can be met due to funding limitations, especially during these times of declining public revenues.

In June 2018, the Board of Supervisors approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board of Supervisors also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in Mental Health Services Act (MHSA) funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built, 816 units

under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of over 2,700 supportive and affordable housing units throughout the county by 2025.

One Single Room Occupancy (SRO)-type facility has been built in the Unincorporated County areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Housing Opportunities Overlay Zone

The Housing Opportunities Overlay Zone (HOO) regulations have been in effect since February 2006. The HOO initially allowed multifamily residential development by-right at a density of 25 units per acre, excluding density bonus, in commercial and industrial zoning districts. Since that time, eight multifamily projects with a total of 421 affordable units have been approved under the HOO regulations (see **Table B-1** for project details). In order to encourage use of HOO development opportunities, Implementation Action 1a. of the previous Housing Element called for expansion of the HOO to include parcels conventionally zoned for multifamily (i.e., R2, R3, R4 and RP). The Zoning Code amendment for that expansion was adopted by the Board of Supervisors on December 9, 2008. In 2020, the HOO was amended again to increase the base density to 43.5 units per acre on eligible parcels. In September 2022, the HOO was amended again to increase the base density from 43.5 to 70 units per acre, excluding any applicable density bonus units.

B. Progress in Meeting Quantified Objectives

Tables A-2 through **A-5** summarize the County's progress in meeting the quantified objectives from the previous Housing Element.

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
1. New Housing Production			
Strategy 1a. Establish affordable housing production as one of the County's highest priorities.	Maintain and expand affordable housing as a priority for the County.	The County successfully aided in the development of affordable housing units across Unincorporated Orange County throughout the 5th Cycle. In 2014, the Board approved Notices of Funding Availability (NOFA) for project-based vouchers and funding remained open throughout 2019 to assist in the development of supportive housing throughout Orange County. As shown in Table 2-35, a total of 21 affordable housing projects constructed between 2020 and 2023 were funded in part or in whole through the 2020 NOFA. These affordable housing developments funded through the 2020 NOFA include 1,318 housing units which span multiple levels of affordability from 20% up to 80% of AMI. 1. In December 2019 the Board authorized issuance of the 2020 Supportive Housing NOFA for funding and project-based vouchers to facilitate the development of permanent supportive housing throughout Orange County, including Unincorporated areas. OCCR released the 2020 NOFA on January 27, 2020, making $10 million in Mental Health Services Act (MHSA) funds, $3 million in Home Investment Partnership Act (HOME) and Housing Successor Agency (HSA) funds and 200 Housing Choice Project-Based Vouchers (PBVs) available for the development of supportive housing units. The Board approved increases to the NOFA in funding and vouchers to accommodate funding additional projects. The 2020 NOFA is an open process and applications are accepted on a first-come, first-served basis. HCD received 15 applications requesting 307 PBVs and approximately $18.2 million in combined requests. In March 2023, the Board authorized the issuance of the 2023 Supportive Housing NOFA for funding and project-based vouchers to facilitate the development of supportive housing throughout Orange County, including Unincorporated areas. 2. In March 2019, the Board approved the Orange County Housing Finance Trust (OCHFT) Joint Powers Agreement to facilitate the development of permanent supportive housing in Orange County. The County is a member of the OCHFT along with 23 Orange County Cities. In January 2020, OCHFT Board approved issuance of the 2020 Permanent Supportive Housing NOFA. In May 2020, the OCHFT received a five-year commitment for a total of $ 20.5 million in County Mental Health Services Act funds and a five-year commitment of County General Fund in the total amount of $5 million. Those funds are to be used as sources of matching funds for the Local Housing Trust Fund Program (LHTF). In August 2020, OCHFT applied for LHTF. In October 2020, the OCHFT received notification of an award of more than $4 million for development of permanent supportive and affordable housing units. As shown in Table 2-35, those funds have supported the development of approximately 22 affordable housing projects, including approximately 1,404 housing units between 2020 and 2023.	The County found this program to be successful and has revised this strategy to further encourage housing production through various programs in the Housing Action Plan Programs 1, 2, 3, 4, 5, 7, and 10.

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
		3. OC Public Works, in collaboration with OC Community Resources, received $310,000 of SB2 Planning Grant funds to create various administrative documents that will help establish and promote the newly formed Orange County Housing Finance Trust (OCHFT), and create the first OCHFT business/strategic plan, a website that provides valuable information for the region regarding the OCHFT activities and create a Notice of Funding Availability document to award funds tom developers for the creation of affordable and permanent supportive housing. In addition, the grant funds were used for the Comprehensive Zoning Code Update (adopted by the Board of Supervisors2020) to incorporate current trends in planning and development and comply with State of California law. OC Public Works also received $500,000 in LEAP funds to update the housing element and prepare other documents to accelerate housing production. 4. Home Investment Partnership Program (HOME), Housing Successor Agency or Mental Health Services Act/Special Needs Housing Program and No Place Like Home funds were made available during the reporting period to support affordable housing projects. Collectively, these funds assisted in the development of approximately 22 housing projects, totaling approximately 1,404 housing units between 2020 and 2023. Orange County continues to pursue opportunities to obtain housing grant funds to assist in the development of affordable housing. 5. In June 2018, the Board approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in MHSA funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built 816 units under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of 2,700 supportive and affordable housing units throughout the county by 2025. The units completed to date represent a completion of 84% of the goal. The County will continue working to complete the remaining 16% of this goal during the current planning period.	
	Facilitate the production of affordable units by offering incentives such as density bonus, expedited permit processing,	The County successfully provided incentive opportunities for affordable housing throughout the 5th Cycle. Orange County continued to provide expedited processing and density bonus incentives to affordable housing projects, along with fee or permit waivers, and where appropriate, parking requirement and setback reductions and increased lot coverage and	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	modifications to development standards, tax-exempt conduit financing, infrastructure financing assistance and direct financial assistance in exchange for a proportional commitment to provide units at affordable prices or rents.	building height. The County adopted an ordinance to allow the deferral of development impact fees and to exempt affordable housing projects from local park fees.	
	Work cooperatively with other governmental agencies, business groups, universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County's long-term viability.	The County successfully partnered with multiple agencies throughout the 5th Cycle. OC Community Resources continued to work cooperatively with numerous agencies and organizations to increase public awareness of the importance of affordable housing to the County's long-term viability. As just a few examples, the County created and provided funding for the OC Housing Finance Trust and continued to serve as the regional coordinator for the OC Office of Care Coordination, including hosting fair housing trainings and adopting a Housing Finance Strategy to increase the numbers of supportive housing units, during the planning period.	
	Aggressively pursue all state and federal housing grant funds for which the County is eligible.	Orange County received funds from the SB 2 Planning Grant Program, Local Early Action Planning (LEAP) Program, and Covid ESG and Covid CDBG funds during the reporting period. Orange County continues to pursue housing grant funds. These funding sources are used to fund programs identified in the County's Consolidated Plan, adopted in 2020, throughout the Unincorporated areas, and in the incorporated jurisdictions of Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, San Juan Capistrano, Seal Beach, Stanton, Villa Park, Placentia, and Yorba Linda. The Consolidated Plan prioritizes funding that specifically addresses housing cost-burden, affordable housing stock, funding public infrastructure and facilities in low- and moderate-income neighborhoods, and to fund projects to meet the needs of people with disabilities and those of seniors. The Consolidated Plan's performance is reviewed and evaluated annually to ensure that it continues to allocate available housing grant funds to projects which prioritize the needs of the lower-income and special needs communities within Orange County as a whole.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
Strategy 1b. Ensure that new large-scale development includes a sufficient range of housing types and densities in appropriate locations to facilitate the production of housing for all economic segments consistent with the County's quantified objectives.	Coordinate the location of major housing developments, particularly affordable housing, and multifamily units, with existing and proposed highway and transit routes, major employment centers, shopping facilities and other services. (see Appendix B)	The eight affordable housing projects built since 2006 are located on or adjacent to transportation corridors. For example. Stonegate I and Stonegate II are fully affordable projects located on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 2, 3, 4.
	Establish affordable housing at the Very low-income level as a priority in negotiating development agreements for new planned communities, or renegotiating existing development agreements.	The County continues to negotiate development agreements for new planned communities. The provision of affordable housing will be encouraged in any future negotiated development agreements. However, no new development agreements were negotiated during the planning period.	
	Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing.	The County successfully facilitated the development of new affordable housing units throughout the 5th Cycle. Rancho Mission Viejo Planning Area 3 –commenced development during the planning period. As a condition of approval, 60 acres of land will be dedicated to the County for affordable housing development. To date, Rancho Mission Viejo has constructed 107 affordable dwelling units in Planning Area 1 and 112 affordable dwelling units in Planning Area 2. Seventy percent (70%) of these units are reserved for low-income households and 30% are reserved for very-low-income households. Pursuant to Addenda No. 1 (2013) and No. 2 (2016) of the AHIA, Rancho Mission Viejo has satisfied 15.6 acres of the required 60 acres. Planning Area 3, which is currently under development, is anticipated to satisfy 26.4 acres of land for affordable housing.	
	To assist the development of housing for lower-income households on larger sites, the County will facilitate parcel maps and/or lot line adjustments resulting in parcel sizes that facilitate multifamily developments affordable to lower-income households in light of state, federal and local financing programs (i.e., 2-10 acres). The County will	Orange County will continue to provide information regarding potential sites available for the development of affordable housing projects. During the planning period, the County developed informational handouts regarding Accessory Dwelling Units/Junior Accessory Dwelling Units, as well as Affordable Housing Development Preliminary Applications to highlight opportunities for development of housing for lower-income households and to ease the application and permitting process for applicants. Additionally, the County developed an SB9 Guidance Document, which provides information on additional opportunities for owners of larger lots to both split their lots and develop additional housing on existing lots through a streamlined approval process and presents an opportunity for the development of additional affordable housing units on both smaller and larger than average parcel sizes. The County also offered the following incentives to affordable housing	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	work with property owners and affordable housing developers to target and market the availability of sites with the best potential for development. In addition, the County will offer incentives for the development of affordable housing.	developers: density bonuses, fee reductions or waivers, reduced parking space and setback, increased lot coverage and building height, and expedited permit processing.	
Strategy 1c. Work with cities, community organizations and neighborhood groups to facilitate redevelopment and infill housing development in conjunction with neighborhood revitalization and annexation of Unincorporated islands.	Continue to review Unincorporated islands and identify priority areas with the highest potential for affordable housing development and annexation. (See Appendix C.)	In 2010, the Orange County Local Agency Formation Commission (LAFCO) developed the "Unincorporated Islands Incentive Program and Strategy Handbook" to facilitate annexation of Unincorporated islands. The implementation of that guidance for the annexation of Unincorporated islands resulted in the annexation of a substantial portion of Unincorporated areas into incorporated jurisdictions during the planning period.	The County found that this program was insufficiently specific to adequately quantify achievements; therefore, this strategy has been replaced with Program 4.
Strategy 1d. Ensure that the County's policies, codes, development review procedures and fees do not represent unjustified constraints to the development of new housing.	Continue to support the Development Processing Review Committee in reviewing existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production.	The Orange County Development Processing and Review Committee (DPRC), made up on development stakeholders, continues to review and work with County staff to modify, if necessary, application and permit review and approval processes. The County successfully supported the DPRC in reviewing permitted fees and review processes throughout the 5th Cycle.	The County found this program to be successful and has revised this strategy to further encourage housing production through Program 2.
	Amend the Zoning Code provisions regarding accessory dwelling units in conformance with state law (AB 1866).	In accordance with the October 2019 passage of AB 68, AB 881, AB 587, AB 671 and SB 13, the Board of Supervisors adopted the Comprehensive Zoning Code Update, which addresses the requirements on ADUs, making the process ministerial and less restrictive to homeowners. The County successfully adopted the Comprehensive Zoning Code Update to address ADUs in the 5th Cycle and, as such, this action is complete.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
Strategy 1e. Pursue policy changes at the state level to remove barriers to the production of affordable housing.	Seek concurrence from the Department of Housing and Community Development that affordable units built in cities and assisted with County funds should be partially credited toward the County's housing production for RHNA purposes in proportion to the amount of County funding.	The County successfully coordinated 2 RHNA Transfer Agreements throughout the 5th Cycle, as well as developed a policy on pursuing future RHNA Transfers. A mutually agreed upon RHNA Transfer Agreement between the City of Santa Ana and the County of Orange for the transfer of twenty (20) very low-income units, and twenty-two (22) moderate-income units was approved by the Southern California Association of Governments in June 2021. Another mutually agreed upon RHNA Transfer Agreement between the City of Placentia and the County of Orange for the transfer of twelve (12) very low-income units, and twelve (12) moderate-income units was approved by the Southern California Association of Governments in July 2021. The County of Orange developed a policy on pursuing RHNA Transfers related to annexations, acquisitions and affordable housing projects funded by the County, and will continue to implement that policy going forward.	The County found this strategy to be successful and will continue to pursue RHNA Transfers. In addition, because the County found this program to be successful, the County has revised this strategy to further encourage housing production through Programs 3 and 4.
	Aggressively pursue tax-exempt bond and low-income tax credit allocations to ensure that Orange County receives its fair share of statewide funding under these programs.	Orange County staff continues to work with developers on a project-by-project basis to leverage County resources to compete for available tax credits and funding from the State.	
	Support legislative reform to strengthen anti-NIMBY laws and to reduce the chilling effect of defect litigation on multifamily and condominium housing production.	Orange County staff continues to monitor legislation that may increase obstacles to affordable housing development, and to support or oppose legislation as appropriate.	
	Support changes to the California Environmental Quality Act that would allow streamlined procedures in urbanized Unincorporated areas similar to those available in cities.	Orange County staff will continue to monitor legislation that may streamline CEQA procedures for projects in the Unincorporated areas, and to support legislation as appropriate.	
Strategy 1f. Ensure that family units are encouraged in new	Encourage developers seeking development agreements to include family rental housing as a part of the developments	The provision of affordable housing will be encouraged in any future negotiated development agreements. No new development agreements were negotiated during the planning period.	The County found that this program to be successful and has revised this strategy to

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
affordable housing development, particularly for large families.	proposed. Seek the goal that 10% of new rental units will be for large families.		encourage housing production through Programs 3 and 4.
	Continue to support County funding criteria to encourage the addition of large family units in new construction projects.	Large family units will continue to be accommodated as appropriate.	
	Develop new financial and/or site standard incentives to encourage affordable housing developers to provide units for large families.	Orange County continues to work with developers to identify constraints to providing family units and how best to address them through the Development Processing Review Committee (DPRC) and on a project-by-project basis. The Orange County Housing Opportunities Overlay Zone provides incentives for the development of affordable housing on commercial and industrial sites in the Unincorporated County by providing administrative approval of entitlements and by-right development.	
	Solicit assistance from affordable housing developers and advocates in identifying potential constraints to the development of family units, including current standards for traffic maintenance, parking ratios or other potential development standards, and submit suggested actions to the DPRC for review.	Orange County continues to work with developers to identify constraints and discuss strategies to incorporate large family units. This includes the County's coordination with developers through the Development Processing Review Committee (DPRC) to identify barriers to development that appear in the development permit process and to address those barriers.	
2. Rehabilitation and Preservation of Existing Neighborhoods			
Strategy 2a. Continue to support programs designed to rehabilitate deteriorated units and encourage the maintenance and minor repair of structurally sound housing units to prevent their deterioration.	Continue to use redevelopment agency housing set-aside funds, federal HOME funds, and other available funding to finance housing rehabilitation.	The County successfully used federal and state funding to assist local households and low-income households throughout the 5th Cycle. The County utilizes Federal Community Development Block Grant (CDBG) and State CalHome Funds to assist low-income households with needed repairs to their homes. The County is continuing to work towards the development of a new single-family rehabilitation program for the Unincorporated Orange County.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Programs 6.
Strategy 2b. Preserve the affordability of federal, state and	Continue to monitor projects with expiring affordability covenants	Orange County continues to work toward preserving the affordability of at-risk units on a project-by-project basis. As a policy, the County attempts to negotiate new agreements to	The County found that this program was insufficiently specific to adequately quantify

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
County-subsidized units threatened with conversion to market rates.	and take appropriate action to preserve these affordable units whenever possible.	extend protections for at-risk units and to preserve their status as affordable when existing agreements near expiration.	achievements, so this program has been replaced with Program 6.
	Continue to assist owners or purchasers of existing Mortgage Revenue Bond (MRB) projects to refund their bonds in exchange for augmented and/or extended affordability controls. Annually contact owners of at-risk units to gauge interest, provide a list of resources available for refund and negotiate terms on a project-by-project basis.		
Strategy 2c. Enhance the quality of existing residential neighborhoods by maintaining public facilities and requiring residents and landlords to maintain their properties in good condition.	Continue the County's code enforcement and graffiti removal programs.	Orange County continues to enforce zoning code and property maintenance requirements throughout the Unincorporated areas, using a complaint-based approach.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6.
	Continue to provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program (CIP).	Orange County continues to provide infrastructure maintenance and improvements in the Unincorporated areas, including upgrades to public infrastructure and public facilities to better meet Americans with Disabilities Act requirements, as well as roadway and flood projects.	
	Continue to participate in the CDBG program.	Orange County continues to participate in the CDBG program, and to facilitate the distribution of CDBG funds in response to applications, using the adopted Consolidated Plan to guide the prioritization of projects that serve affordable housing and special needs populations.	
	Identify existing apartment complexes in need of repair and provide financial assistance or other incentives to encourage the owner to make a substantial investment in rehabilitation and	Orange County continues to research various forms of financial assistance for the repair and rehabilitation of existing housing stock. Housing rehabilitation is an activity eligible for funding through the HOME Investment Partnerships Program (HOME), Community Development Block Grant Program (CDBG), and Section 108 Loans. In Fiscal Year 2021-2022, CDBG funds helped 9 housing rehabilitation projects. HOME funds also assisted in funding housing rehabilitation projects during Fiscal Year 2021-2022.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	ongoing maintenance and guarantee long-term affordability.		
	Review Unincorporated islands and identify three priority areas with the highest potential for affordable housing development.	The County has identified potential sites for the development of affordable housing projects.	
Strategy 2d. Ensure that the conversion of rental units or mobile home parks to ownership or other uses occurs in a responsible manner to protect the rights of both owners and tenants.	Continue to enforce the provisions of the County's condominium and mobile home park conversion ordinance (section 7-9-147).	The County continues to enforce the provisions of the County's condominium and mobile home conversion ordinance (section 7-9-39). During the planning period, no issues of conversion of condominiums and mobile home parks from rental units to ownership or other uses has occurred.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6.
3. Equal Housing Opportunity			
Strategy 3a. Continue to support enforcement of fair housing laws and organizations that provide fair housing information and intervention.	Provide financial assistance from CDBG funds or other sources to fair housing organizations.	Orange County continues to provide financial assistance from CDBG funds, or other sources, to fair housing organizations.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 8.
Strategy 3b. Facilitate the education of residents about their fair housing rights and of the process to make appropriate referrals for fair housing complaints.	Provide federal/state/local information regarding discrimination to residents at family briefing sessions, including applicable Fair Housing Information and Discrimination Complaint Forms. Also maintain bilingual staff to assist non-English speaking families and handicap accessible offices.	Orange County continues to provide information regarding housing discrimination to residents both through online publications and information housed on the OCCR website, and through periodic public information sessions regarding fair housing. The Orange County Board of Supervisors approved the County's 2020-2025 Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan (the Consolidated Plan) on June 23, 2020. The Consolidated Plan identifies priorities for the use of the HOME, CDBG, and ESG funds that the County administers, which includes programs to assist in addressing fair housing issues. The County also partners with the Fair Housing Council of Orange County to provide information on fair housing and housing discrimination. OC Housing Authority's offices are handicap accessible, and the County is more broadly engaged in ensuring that County facilities are accessible, and in making accessibility upgrades to public infrastructure. The County's Community Resources offices maintain bilingual staff to assist non-English speaking families. Additionally, the County partners with 2-1-1, a 24/7	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 8.

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
		telephone resource system that links residents with community health, human services, and support organizations, including fair housing resources.	
	Continue to work with the Orange County Fair Housing Council to provide information and regarding housing discrimination and intervention to resolve complaints. Literature is made available at County and FHC offices.	Orange County continues to work with the Fair Housing Council to provide information to residents and regarding housing discrimination and intervention to resolve complaints. The County hosts fair housing trainings for property managers and owners and posts fair housing information on its website, and the Fair Housing Council of Orange County provides fair housing information both on its website, through workshops and seminars, and in-person at its offices.	
Strategy 3c. Encourage the removal of architectural barriers in existing residential units, and ensure that new units comply with accessibility standards.	Continue to enforce building code provisions requiring accessible design.	Orange County continues to enforce building code provisions requiring accessible design. A reasonable accommodation ordinance was adopted in 2013. For projects requiring discretionary permits, accessibility requirements included in the Building Code are required to be met before a permit can be closed out.	The County found that this program was insufficiently specific to adequately quantify achievements. A strategy to encourage housing production has been included in Programs 1, 2, 3, 4, 5, and 7.
4. Assistance to Persons in Need			
Strategy 4a. Encourage affordable housing opportunities for households with incomes less than 30% of area median income (AMI)~~,~~	Continue to support the County Housing Authority and its participation in the Section 8 Rental Assistance Program and pursue additional Section 8 rental assistance vouchers when available.	The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 2, 3, 4, 5, and 7.
	Continue the goal of producing units affordable at or below 30% AMI in the County's Rental Housing NOFA.	Orange County's NOFA continues to include the goal of producing affordable units to extremely-low-income persons and households.	
	Encourage developers seeking development agreements to include housing units affordable to households with incomes of less than 30% AMI.	The provision of affordable housing will be encouraged in any future negotiated development agreements. No development agreements were negotiated during the planning period.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
Strategy 4b. Provide information and financial assistance to help low- and moderate-income households in obtaining affordable housing.	Continue the Tax -Exempt Single-Family Mortgage Revenue Bond Program for first-time homebuyers.	Orange County continues to provide the Tax-Exempt Single-Family Mortgage Revenue Bond Program for first-time homebuyers.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 3, and 5.
	Continue to publish the Affordable Rental Housing List.	Orange County continues to publish the Affordable Rental Housing List to provide information to lower-income renters. The Affordable Rental Housing List is published on the County's website for easy access and is updated regularly. The Affordable Rental Housing List is published in multiple languages to ensure that all people looking for affordable rental accommodations have access to the same information.	
Strategy 4c. Ensure that all affordable housing assisted with public funds remains affordable for the required time period, and recapture public funds when directly subsidized units are prematurely sold or otherwise withdrawn from the subsidizing program.	Monitor all bond-financed and other subsidized projects annually to verify compliance with affordability covenants.	The County continued to maintain affordability of existing units to the greatest extent possible. Affordable housing projects are monitored on a regular basis to verify continued required affordability.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6. .
Strategy 4d. Continue to support the existing programs that address the needs of those in need of temporary and transitional housing.	Continue to provide assistance as described in the County's Continuum of Care program.	In June 2018, the Board approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in MHSA funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built, 816 units under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of over 2,700 supportive and affordable housing units throughout the county by 2025. To date, approximately 84% of the total unit goal has been met by the units which are completed, in construction, or in the process of funding.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Programs 2 and 4.
	Identify additional sites that are now available or easily made available for transitional shelters	Orange County will continue to provide information regarding the location of sites eligible under its Housing Opportunities Overlay Zone – primarily through information available on the County's website.	

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	for homeless persons and families.		
5. Energy Conservation			
Strategy 5a. Encourage the use of energy conservation features in residential construction, remodeling, and existing homes.	Continue to require new construction and remodeling projects to meet energy conservation requirements.	Orange County continues to require new construction and remodeling projects to meet energy conservation requirements as a part of permitting and entitlement review.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 2, 3, 4, 5, 7, and 9.
	Provide information regarding energy efficiency measures in the Orange County Housing Opportunities Manual.	The County continues to publicize available assistance programs through the County website and flyers. Information regarding energy efficiency measures continues to be included in the Housing Opportunities Overlay Manual. Sustainable best practices are incorporated in the Comprehensive Update to the Zoning Code, and include various measures, such as the option to use pervious materials in driveways and allowing carport roof solar panels with no additional permit requirements. Additional language is proposed relating to electric vehicle charging stations, "hedges" are added as a type of wall or fence, alternative parking calculations are permitted along with new parking lot landscaping requirements.	
	Provide clients with information regarding "CalGreen" – California's Green Building Code.	Clients receive information regarding CalGreen (green building code) and energy conservation at County of Orange offices and on its websites. The County provides information through the County website and flyers.	
6. Child Care Facilities			
Strategy 6. Amend existing regulations to remove regulatory obstacles for new child care facilities within affordable housing developments	Both the Zoning Code and Housing Opportunities Manual will be amended to allow the provision of child care in affordable housing developments utilizing the Housing Opportunities Overlay Zone program. The County's Child Care Coordinator will be invited to assist in the development of the criteria and requirements for child care facilities and family day care homes. All conditions and require-	Orange County amended its Housing Opportunities Overlay Zone regulations in 2009 to provide incentives (I.e., a density bonus) for the inclusion of child care facilities within affordable housing developments.	The County found that this program was insufficiently specific to adequately quantify achievements. Objectives to encourage housing production have been included in Programs 1, 2, 3, 4, 5, 7, and 9.

Strategy	Action	Accomplishments	6th Cycle Status
	ments applied to this use will be delineated in the Affordable Housing Agreement entered into between the County and developer for each affordable housing development.		

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Multifamily							
Anaheim	Cerritos	R1				60	60
Midway City	Potter's Lane 15352 Jackson	R1				16 37	16 37
Midway City		R3(1950)/35				17	17
Midway City		R3(1950)/35(H)				4	4
Stanton	Stonegate I Stonegate II	C1(H)				38 26	38 26
Rancho Mission Viejo		PC				637	637
Silverado-Modjeska		A1(SR)				2	2
						Total Multifamily	837

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Accessory Dwelling Units							
Anaheim		R1				6	6
Anaheim		R2D				1	1
Costa Mesa		R1				1	1
Coto de Caza		S				1	1
Foothill Trabuco		S				1	1
Los Alamitos (Rossmoor)		R1/28 (C3849)				1	1
Midway City		R1				37	37
Midway City		R3(1950)/35 (H)				3	3
Santa Ana (North Tustin)		100-E4				3	3
Santa Ana (North Tustin)		125-E4-20000				1	1
Santa Ana (North Tustin)		E4				1	1
Santa Ana (North Tustin)		E4-20000				1	1
Santa Ana (North Tustin)		NTSP				3	3
Santa Ana (North Tustin)		R1				4	4
Orange		70-R1				2	2
Orange		E4-1(E)				1	1
Orange		E4-1(SR)(E				1	1
Orange		R4				1	1
Rancho Mission Viejo		PC				2	2

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Santa Ana (North Tustin)		100 - E4				2	2
						Total Accessory Dwelling Units	73
Modular Units							
Orange		R4				1	1
						Total Modular	1
Single Family Units							
Anaheim		R1				28	28
Anaheim		R2D				1	1
Costa Mesa		R1				4	4
Costa Mesa		R4				5	5
Coto De Caza		S				14	14
Foothill-Trabuco		FTSP				7	7
Ladera Ranch		PC				477	477
Laguna Beach (Emerald Bay)		R1(CD)(SR)				28	28
Los Alamitos (Rossmoor)		R1/28 (C3849)				38	38
Midway City		R1				35	35
Midway City		R3(1950)/35 (H)				8	8
Santa Ana (North Tustin)		100-E4				8	8
Santa Ana (North Tustin)		125-E4-20000				8	8
Santa Ana (North Tustin)		E4				8	8

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Santa Ana (North Tustin)		E4-20000				3	3
Santa Ana (North Tustin)		NTSP				5	5
Santa Ana (North Tustin)		R1				1	1
Santa Ana (North Tustin)		R1-18000				1	1
Orange		E4-1				2	2
Orange		E4-1(E)				3	3
Orange		E4-1(SR)(E)				2	2
Orange		R1				1	1
Orange		R1(SR)				4	4
Orange		R1-10000(SR)				1	1
Orange		R4				1	1
Rancho Mission Viejo		PC				2684	2684
Santa Ana (North Tustin)		100 - E4				3	3
Santa Ana (North Tustin)		E4-20000				1	1
Santa Ana (North Tustin)		R1-10000(SR				1	1
Silverado-Modjeska		A1				7	7
						Total Single Family	**3389**

**Lower-income apartments and accessory dwelling units are based on prevailing market rents*
Source: OC Development Services, 2021
Note: Descriptions of zoning districts can be found in Table 3-3

Table A-3
Affordable Housing Projects Completed 2013-2021
Unincorporated Orange County

Project	Status	Location	Zoning	Parcel Size (ac)	Density (du/ac)	Income Level				Total Units
						VL (EL*)	Low	Mod	Above Mod	
Sendero Bluffs	Completed and occupied	Rancho Mission Viejo	PC	2.78	38.4	32	74	0	1**	107
Esencia Norte	Completed and occupied	Rancho Mission Viejo	PC	4.0	28	34	77	0	1**	112
Potter's Lane	Completed and occupied	Midway City	C2	0.41	39	15	0	0	1**	16
TOTALS (deed-restricted affordable units only)						**81**	**151**	**0**	**3**	**235**
					Avg. Density of All Projects	**35.1**				
					Avg. Density of Projects in Housing Opportunities Overlay Zone	**39**				

** Extremely low-income (30% AMI)*
*** Manager's unit (not deed-restricted)*
Source: OC Development Services, 2021
Note: Descriptions of zoning districts can be found in Table 3-2

Table A-3 illustrates the affordable housing projects completed during this reporting period (2013-2021):

- **Esencia Norte** is located at the east side of Esencia Drive between Cow Camp Road and Andaza Street in the Unincorporated community of Ranch Mission Viejo, includes a new construction development of 111 units serving large families with rents affordable to households earning 50-60% of area median income (AMI).
- **Sendero Bluffs** is located at northeast corner of Ortega Highway and Gateway Place in Rancho Mission Viejo, includes a new construction development of 106 units of housing serving seniors with rents affordable to households earning 50-60% of area median income (AMI).
- **Potter's Lane** is a 16-unit affordable housing apartment community per Housing Opportunities Overlay Zone Regulations. The project is two stories, with 15 studio units (480 sq. ft.), and one Manager's Unit (480 sq. ft.). The Project is 100% affordable to low- and very low-income households. Based upon its affordability, the project was eligible for a 35% density bonus and three incentives.

Table A-4
Progress Towards Meeting New Housing Need
Unincorporated Orange County 2013-2021

	Very Low*	Low*	Moderate*	Above Moderate	Total
Total RHNA 2013-2021	0	879	979	2,174	5,272
Quantified Objective	1,240	879	979	2,174	5,272
Total Units Built 2013-2021	81	151	180	4,429	4,841

Table A-5
Preservation and Assistance
Performance Evaluation vs. Quantified Objectives 2013 – 2021

Program	Extremely Low-Income	Very Low-Income	Low-Income	Moderate Income	Above Moderate-Income	TOTAL
Continuum of Care (CoC) (previously referred to as Shelter Plus Care)	444	54	19	83	–	600
% Breakdown	74%	9%	3%	14%	–	100%
Actual	408	50	17	76	–	
% Breakdown	74%	9%	3%	14%	–	100%
Housing Choice Voucher (HCV) (previously referred to as Section 8 Rental Assistance)	5,396	1,466	433	3,810	–	11,105
% Breakdown	49%	13%	4%	34%	–	100%
Actual	4,808	1,314	386	3,386	–	9,894
% Breakdown	49%	13%	4%	34%	–	100%

Source: OC Community Resources / Occupancy data on the actual point in time income levels of active CoC and HCV Program participants is derived from the Income Characteristics Report prepared via Housing Pro on June 2021.
(-) is used to denote that we do not have quantified objectives for Above Moderate housing.

Rehabilitation - Performance Evaluation vs. Quantified Objectives 2013 – 2021

The County's rehabilitation program was inactive from 2013-2022. OC Community Resources is continuing to work towards the development of a new single-family rehabilitation program for Unincorporated Orange County scheduled to begin in 2022.

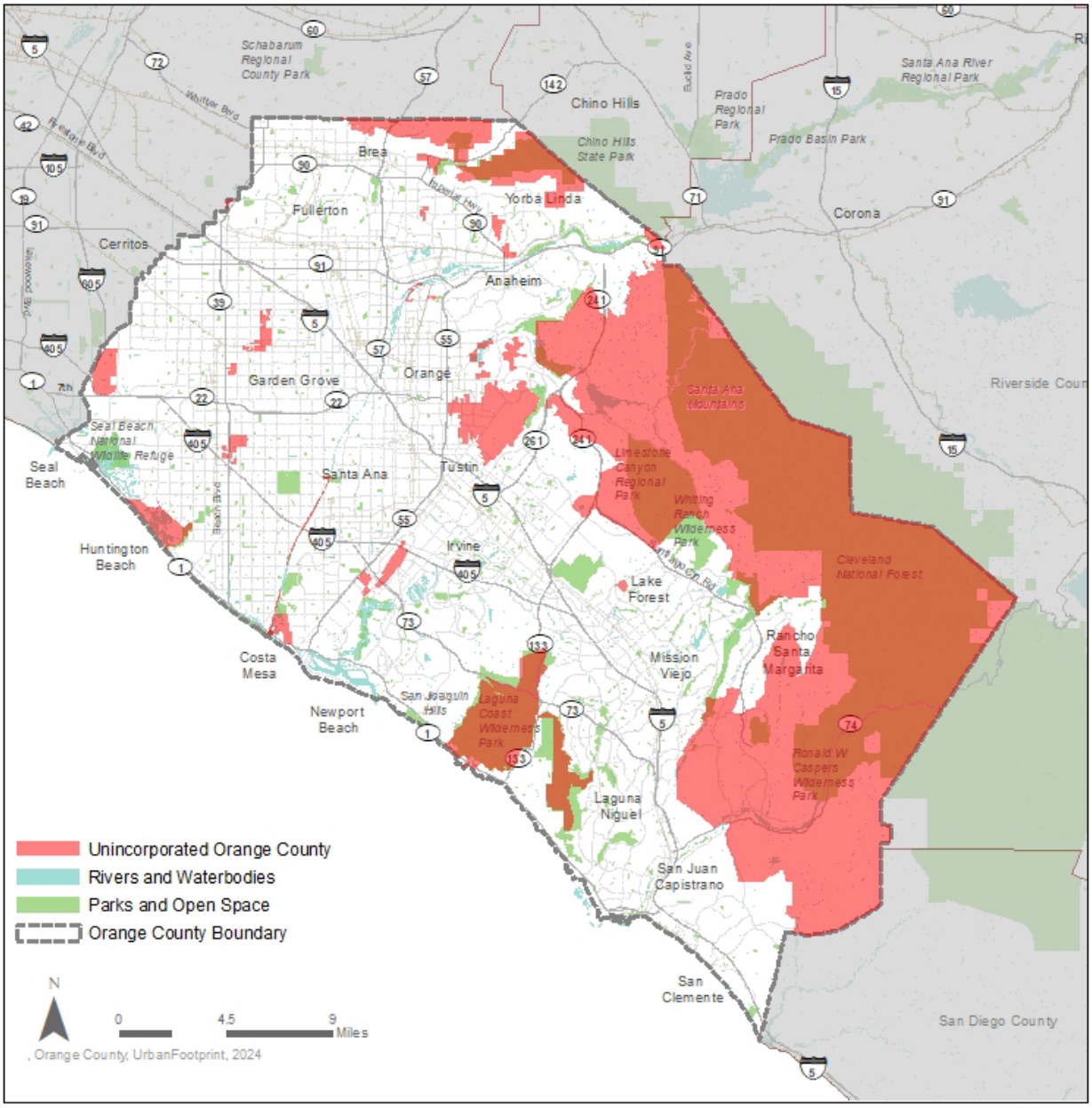
APPENDIX B: LAND INVENTORY

State law requires that jurisdictions include a statement of their goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing. (Gov. Code, Section 65583, subd. (b).) The Housing Element is required to include an inventory of suitable sites for housing development compared to the jurisdiction's assigned share of the region's housing need. Part of this analysis involves identifying adequate sites to accommodate a jurisdiction's share of regional housing needs for all income groups. Adequate sites are those with appropriate zoning designations and development regulations needed to facilitate and encourage the development of a variety of housing for all income levels. The land and program resources available for the development of housing in Unincorporated Orange County are addressed here.

The Unincorporated County

While there are 34 cities in Orange County, this housing element focuses on the Unincorporated area - territory that is not located within a city. Due to the geographic distribution of Unincorporated land, the Housing Element (along with the rest of the General Plan) must address a diverse geographic and socioeconomic area, from small Unincorporated islands surrounded by cities to large, planned communities. Most of the Unincorporated County land area is in the southern portion of the County. In the central and northern parts of the County, there are many small, Unincorporated "islands" of property (see **Figure B-1**). Since 1993, the incorporation of three new cities (Laguna Woods, Rancho Santa Margarita, and Aliso Viejo) together with the annexation of Unincorporated territory to existing cities during this period, have reduced the Unincorporated County area in size by over 40 percent, from approximately 414 square miles to 321 square miles. Also, most of the Unincorporated County areas in the southern part of the County are preserved as open space/agriculture due to the mountainous geography. This leaves limited areas for residential development in areas that are fully or almost fully built out.

Figure B-1
Unincorporated Orange County



The assumptions and methodology for the residential land inventory are provided in this appendix. The sites identified within the Housing Element represent the County of Orange's ability to plan for housing at the designated income levels within the 6th Cycle planning period (2021-2029).

Table B-1 shows the County's 2021-2029 RHNA need by income category as well as a summary of the sites identified to meet that need. The analysis within this appendix shows that the County of Orange has the capacity to meet their 2021-2029 RHNA allocation through a variety of methods, including:

- Identification of development capacity on sites which either currently permit development of residential uses at or above 30 dwelling units per acre.
- Identification of County owned properties suitable for the development of housing.
- Future development of accessory dwelling units (ADUs).

Zoning and Affordable Housing in Orange County

Demand for housing in Orange County, and all Southern California in general, has significantly increased over the past decade due to slow housing production. The County has worked to encourage housing development but is constrained, as are other urbanized jurisdictions, by lack of undeveloped (vacant) land, high land prices, open space deficits, and productive industrial uses that create land use conflicts if too close to residential neighborhoods. All the while, the cost of developing subsidized affordable housing has increased while public funding has decreased. Knowing that the housing needs of County residents and their families have reached a critical pitch, the County has embarked on many programmatic actions to expand the opportunities for new residential development.

The County has established a Housing Opportunities Overlay or "HOO" zoning overlay district that provides for the development of 100% affordable rental housing by-right (without a use permit) within commercial and/or industrial districts, and on building sites zoned for higher density residential uses, and for the establishment of emergency shelters, multi-service centers and low-barrier navigation centers. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning. The County also offers alternative (reduced) parking requirements for residential development within the Housing Opportunities Overlay Zone.

In 2022, the Board of Supervisors adopted a Zoning Code amendment to increase the base density in the Housing Opportunities Overlay Zone from 43.5 to 70 units per acre, excluding any applicable density bonus units and geographically expanded the Housing Opportunities Overlay (HOO). Developers are also able to achieve even higher densities through the State's density bonus provisions. Since the adoption of the Housing Opportunities Overlay Zone, nine projects (within the Housing Opportunities Overlay Zone) with a total of 371 affordable units have been approved, which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families. More than half of those units have been developed in the last ten years. The average density of these projects has been over 40 units per acre. This is significant as the maximum base HOO density at the time of project approval was either 25 units per acre (2006-2020) or 43.5 units per care (2020-2022). Compared to the base density allowed in the HOO at project approval, most projects resulted in densities of over 100%. Overall, the average density for all HOO projects was 134% of maximum allowed density. With a base density increase to 70 units per acre, the potential for new housing development in the HOO is

significant. The HOO projects developed or under development since 2007 is presented in **Table B-14.**

To further encourage development of higher density housing, in 2024, the minimum density for most multi-family zoned areas was increased to 30 units per acre and properties zoned for Local Business (C1), General Business (C2), Commercial Neighborhood (CN), or Residential Profession (RP), were rezoned to the Mixed-Use (MX) zoning designation. The Mixed-Use designation allows stand-alone residential development at a minimum of 30 units per acre density and requires the inclusion of at least 50% residential development for mixed-use projects. Stand-alone non-residential development is not allowed which means that within the mixed-use zone with an HOO overlay, higher density, affordable, stand-alone housing is most likely to develop.

Accommodating the 6th Cycle RHNA in built-out communities like those in the Unincorporated County represents a formidable challenge. Nonetheless, the County has paired this housing resources section with an aggressive set of policies and programs that will work to address the challenge.

Regional Housing Needs Assessment (RHNA) for 2021-2029

The Regional Housing Needs Assessment (RHNA) is a key part of State housing element law (Government Code Section 65580) and is a central factor in satisfying periodic required updates of the housing element. Every city and county in the State of California has a legal obligation to respond to its fair share of the existing and projected future housing needs in the region in which it is located. Housing element law requires local governments to update land use plans, policies, and zoning to accommodate projected housing growth. The RHNA figure is not a projection of residential building permit activities, but of housing need based on regional growth projections and regional policies for accommodating that growth. Although the Housing Element covers the eight-year planning period from October 15, 2021, through October 15, 2029, the 6th projection period spans June 30, 2021, through October 15, 2029.

For the 2021-2029 planning period, the Unincorporated County's RHNA allocation is 10,406 housing units. The 10,406 housing units allocated to the unincorporate area for the 6th RHNA planning cycle is divided as follows: 3,139 housing units for extremely low and very low-income households, 1,866 housing units for low-income households, 2,040 housing units for moderate-income households, and 3,361 housing units for above-moderate-income households.

Every housing element must demonstrate that the local jurisdiction has made adequate provisions to support the development of housing at various income levels (extremely low, very low, low, moderate, and above moderate) to meet its 'fair share' of the existing and projected regional housing need. However, because local jurisdictions rarely, if ever, develop and construct housing units, the RHNA numbers establish goals that are used to guide planning, zoning, and

development decision- making. Specifically, the numbers establish a gauge for determining whether the County is allocating adequate sites at a range of densities to accommodate the development of housing– meeting the County's RHNA. In particular, the County must identify adequate sites for lower-income households that will allow residential uses at a density of at least 30 units per acre.

Local Issues and Trends

The following is a summary of local housing trends, which correlate with the RHNA allocated to the Unincorporated County areas, and illustrate the changing housing needs within the Unincorporated County areas:

- As shown in **Table B-1**, the County has identified 1,707 housing units that have been completed to contribute to the County's efforts to meet its 2021-2029 RHNA.
- Over the last eight years, over 3,779 housing units have been constructed in the Unincorporated County areas, 81 of which serve very low-income households, and 151 of which serve low-income households.
- The County satisfied 91.9% of its quantified objectives for providing Continuum of Care (551 Continuum of Care participants out of the 600-participant objective) between 2013 and 2021.
- The County satisfied 89% of its quantified objective for Housing Choice Voucher participants (9,894 participants out of the 11,105-participant objective) between 2013 and 2021.
- Since 2010, the County's population has become increasingly diverse leading to more diverse housing needs, including creased demand for very low-, low-income, and rental housing options.
- Currently, an estimated 128,421 persons reside in the Unincorporated County areas (DOF 2020), comprising over 42,000 households (estimated based on the American Community Survey 2020, 5-year estimates).
- Housing prices and median gross rent both in the Unincorporated County areas and Orange County as a whole have increased in the time since 2013, indicating a tight housing and rental market in the face of increased demand.
- Despite the Unincorporated County areas' loss of households and population to incorporations and annexations, SCAG forecasts that the Unincorporated County areas will grow by 49.2% over the next ten-year planning period.
- More than 50% of renters in Unincorporated County areas are in overpayment situations, with a smaller percentage of homeowners in Unincorporated County areas being in overpayment situation the Unincorporated County areas is $90,234.

- While most of the housing stock in the Unincorporated County areas is more than 20 years old, only approximately 1% of the housing stock in the Unincorporated County areas is in need of repair or rehabilitation.

Strategies for Meeting the RHNA

Orange County's housing needs will be met through the implementation of a variety of strategies (**Table B-1**). California law requires communities to facilitate the development of housing through land use planning and zoning regulations. State housing element law allows local governments to obtain credits toward meeting its RHNA goal in different ways:

- Units approved, entitled, or constructed that would be available during the RHNA projection period of June 30, 2021, through October 15, 2029
- Accessory Dwelling Units (ADUs) that may be constructed based on a projected trend
- Vacant and nonvacant sites available for residential and mixed-use development during the Housing Element planning period (October 15, 2021, through October 15, 2029)

The primary method for addressing the adequate sites requirement is the identification of available vacant and underutilized sites that are appropriately zoned and likely to develop within this planning period. Following available site identification, sites that would be available for housing once rezoning actions were completed were identified. The following describes the County's approach to addressing its 2021-2029 RHNA as determined by the Southern California Association of Governments (SCAG).

Table B-1
RHNA Strategy Summary

	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
RHNA (2021-2029)	*1,570*	*1,569*	*1,866*	*2,040*	*3,361*	*10,406*
Units approved, entitled, or constructed (Begins June 30, 2021- December 31, 2023)		111	21	10	1,798	1,940
Constructed/Projected ADU Development		128	221	154	10	513
Sites Not Requiring Rezoning		557	-	1,124	2,326	4,007
RHNA Shortfall		**(2,343)**	**(1,624)**	**(752)**	**+773**	
Sites Rezoned		4,266	-	871	-	5,137
RHNA Status: +Surplus/(Shortfall)			***+299***	***+119***	***+773***	

Approved, Entitled, or Constructed Projects

Approved and proposed residential development projects can be credited toward the 2021-2029 RHNA. In Unincorporated Orange County, projects credited towards the RHNA are shown in **Table B-2**. Two projects are affordable:

- Casa Paloma is a fully affordable housing project developed in the Housing Opportunities Overlay Zone and on the site of a previous pottery manufacturing facility. The four-story apartment building consists of 71 units (69 rental units and two managers' units), of which 48 units serve formerly homeless households. The Development consists of 59 one-bedroom units, 10 two-bedroom rental units and two two-bedroom managers' units. Rents for 48 of the units are set at 30 percent of Area Median Income (AMI) and the remaining rental units will be set at 50 percent AMI or below. The project was developed by American Family Housing, a nonprofit affordable housing developer, and financing included a County permanent loan, HCD Housing for a Healthy California funds, and commitment of 48 Housing Choice and/or Mainstream Project Based Vouchers.
- American Family Housing is developing a 65-unit affordable development in the Housing Opportunities Overlay Zone in Midway City. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project qualifies for the unlimited density bonus provision. The project's proximity to a major transit stop also permits use of modified parking standards. The planning application for the Jackson Street project was approved in 2024.

Table B-2
Approved or Entitled Projects (since June 30, 2021)

Project	Extremely-/ Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total	Status
Saddlecrest (SF project)	-	-	-	65	65	Under construction (2024); Expected completion: 2026
Cielo Vista (SF project)	-	-	-	80	80	Under construction (2024); Expected completion: 2026
Esperanza Hills SP (SF project)	-	-	-	340	340	Approved, processing permits; Expected completion: 2028

Table B-2
Approved or Entitled Projects (since June 30, 2021)

Project	Extremely- / Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total	Status
Wass Condo (SF- A project)	-	-	-	10	10	Approved; Expected completion: 2026
Cowan Heights Estate (SF project)	-	-	-	16	16	Under construction (2024); Expected completion: 2026
Casa Paloma (Affordable MF project)	48	21	-	2	71	Constructed (2024)
American Family Housing (Affordable MF project)	63	-	-	2	65	Approved; Expected completion: 2026
Single units approved, entitled, or constructed (June 30, 2021-October 2024)	-	-	10	1,283	12,93	
Total	***111***	***21***	***10***	***1,798***	***1,940***	
Source: County of Orange, 2024 SF: Single Family; SF-A: Single Family Attached; MF: Multifamily						

Constructed/Projected Accessory Dwelling Units (ADUs)

In accordance with State law, the County may credit potential ADUs to the RHNA requirements by using the trends in ADU construction to estimate new production. Between 2018 and 2023, the County has seen steadily increasing ADU activity, with a total construction of 285 units over 6 years:

- 2018 – 23 ADU permits
- 2019 – 21 ADU permits
- 2020 – 50 ADU permits
- 2021 – 57 ADU permits
- 2022 – 60 ADU permits
- 2023 – 73 ADU permits

Looking back at ADU trends for the Unincorporated County, starting in 2018, the County issued 23 ADU permits, followed by 21 permits in 2019, 50 permits in 2020, 57 permits in 2021, 60

permits in 2022, and 73 permits in 2023. From June 2021 through the end of 2023, there were about 162 ADU permits issued. In summary, since 2018 the County has seen a 217% increase in the number of ADU permits issued. The County continues to see year over year growth in ADU applications and ADU permits issued which is a strong indicator that future ADU permits issued will exceed the past rate of production and continue the upward trend. The County is facilitating ADU production through a variety of proactive efforts. For the remaining 5.83 years left in the planning period, an annual estimate of 60 units based on the average permits issued from 2020-2023 (4 years) is used. Given that 73 permits were issued in 2023, this estimate is reasonable and achievable.

SCAG conducted an income/affordability survey of ADUs in the region. Orange County is located within the Orange County study area for the SCAG income/affordability ADU survey. The analysis resulted in affordability assumptions for jurisdictions in Orange County as follows: 15% can be assigned to the extremely-low-income category, 10% to very low-income, 43% to low-income, 30% to moderate-income, and 2% to above-moderate-income. Therefore, based on the ADU rent survey conducted by SCAG, of the 513 ADUs that can be credited toward the RHNA, the income distribution can be estimated at 128 extremely-/very low-income, 221 low-income, 154 moderate-income, and 10 above-moderate-income units.

The County has updated the Zoning Code to comply with State law regarding accessory dwelling units, or ADUs. ADUs are housing units which may be developed in addition to an existing single- or multifamily residential use. These housing units can be free-standing or attached to a primary structure and are intended to provide additional housing on an existing residential lot. Often ADUs provide housing for family members or are rented to members of the community. OC Development Services is currently preparing pre-approved ADU plans to streamline and facilitate a more streamlined ADU permitting process (see Housing Action Plan, Program 7), which is anticipated to contribute to continued increase in ADUs applied for, permitted, and constructed within Unincorporated Orange County. Along with preparing pre-approved ADU plans, in March 2023, the Orange County Housing Finance Trust (OCHFT) was awarded a $4 million grant from CalOptima Health for the purpose of creating and operating an ADU Loan program. The program is designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences with a goal of expanding access to income opportunities for homeowners while also providing much needed affordable rental units exclusively for very low-income tenants, including and prioritizing Section 8 voucher holders. Both programs-approved ADU plans and the ADU loan program are anticipated to bolster ADU production throughout the County and encourage the development of additional affordable units.

OC Development Services will continue to track ADU development by affordability level and report on Annual General Plan Progress Report (APR). Through the County's permitting system, the County currently tracks ADU applications and permits daily. The County reports this progress regularly through a variety of required reporting. Since 2010, the County reports the

total number of issued housing units, which include the specific number of ADU/JADUs, to the US Census Bureau monthly. Secondly, the total number of completed residential housing units, including the total number of ADUs/JADUs completed, are reported in a mid-year and annual report through the Housing Unit Inventory System to the Center for Demographic Research (CDR) since 2015. Finally, since 2011, the County reports ADU progress in the APR and Housing Element Implementation Report, and the Department of Finance Housing Unit Survey.

The County has also included an action under Program 6 in the Housing Action Plan to continue current tracking and reporting of ADU permit activity and should changes need to be made due to a gap in the number of ADUs projected and the number permitted, the County will make changes proportional to the gap identified within 6 months of the annual review. This may include, but is not limited to, rezoning or community outreach.

Summary of Progress Toward RHNA

After accounting for projects developed or under development and projected ADU development, the remaining RHNA allocated to the County for this 6th Cycle is 7,953 units. The County must identify available vacant and non-vacant sites that can accommodate at least 7,953 units (by income level). HCD also recommends that jurisdictions identify residential capacity within their boundaries that is above and beyond the required housing numbers identified in lower-income categories, to help offset sites that may (or may not) be developed during the planning period. The County must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029. To accomplish this, the Sites Inventory was developed and is described in further detail in the following section.

Table B-3
Remaining RHNA Need After Credits and ADU Units

	Extremely/ Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
Units approved, entitled, or constructed (Begins June 30, 2021- December 31, 2023)	111	21	10	1,798	1,940
Constructed/Projected ADU Development	128	221	154	10	513
Total	***239***	***242***	***164***	***1,808***	***2,453***
RHNA (2021-2029)	*3,139*	*1,866*	*2,040*	*3,361*	*10,406*
RHNA Status: +Surplus/(Shortfall)	***(2,900)***	***(1,624)***	***(1,876)***	***(1,553)***	***(7,953)***

Availability of Sites for Housing Production

This section contains an analysis of existing and available land with the potential for housing development in the 2021-2029 planning period compared to the Unincorporated County's remaining housing need.

Sites Not Requiring Rezoning

The inventory of sites that have appropriate zoning in place include one master planned community, one County-owned property, and religious institutions sites (outside of the Housing Opportunity Overlay) that could accommodate residential development. The sites have the appropriate land use and zoning designations in place and did not require any rezoning actions. A summary of currently available sites is presented in **Table B-4**, and a detailed listing consistent with state law is included in **Table B-8**.

Additional land resources are available for future residential development on underutilized sites that required zoning amendments; those sites will be discussed later in this section as sites that required rezoning actions to become adequate sites.

Table B-4
Summary of Sites Not Requiring Rezoning

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
Rancho Mission Viejo	165	1,000	1,894	3,059
Coyote Canyon	62	124	432	618
Non-HOO Religious Institution Sites	330	-	-	330
Total	***557***	***1,124***	***2,326***	***4,007***
Remaining RHNA (after Credits/ADUs)	***4,524***	***1,876***	***1,553***	***7,953***
RHNA Shortfall Status: +Surplus/(Shortfall)	***(3,967)***	***(752)***	***+773***	

Rancho Mission Viejo

During the past 50 years most development in Unincorporated Orange County has occurred in major landholdings under the planned community concept. Most of these areas were incorporated into new cities between 1988 and 2001, including Mission Viejo (1988), Dana Point (1989), Laguna Niguel (1989), Lake Forest (1991), Laguna Hills (1991), Laguna Woods (1999), Rancho Santa Margarita (2000), and Aliso Viejo (2001). Most of these areas were originally approved as planned communities in Unincorporated Orange County.

Only one planned community in the Unincorporated County areas, Rancho Mission Viejo – has a significant amount of land remaining to be developed during this Housing Element timeframe. Located in southeastern portion of the County east of Rancho Santa Margarita, Mission Viejo and San Juan Capistrano, Rancho Mission Viejo was approved in 2004 with a maximum of 14,000 residential units. It is expected to be the final large landholding that will be developed in Unincorporated Orange County since all other significant undeveloped parcels are located within cities, regional parks, or the Cleveland National Forest.

In November 2004 the Board of Supervisors adopted a General Plan Amendment, Development Agreement, Rancho Mission Viejo Planned Community Program with associated Statistical Table and Planned Community Development Map, and a Zoning Ordinance with associated Statistical Summary and Zoning Map for Rancho Mission Viejo. This action approved entitlements for the project and established Planned Community zoning on the property allowing the developer to move ahead with the construction of dwelling units, commercial, recreational, and other non-residential uses. Since 2004, Rancho Mission Viejo has been working with the County to prepare detailed development and infrastructure plans.

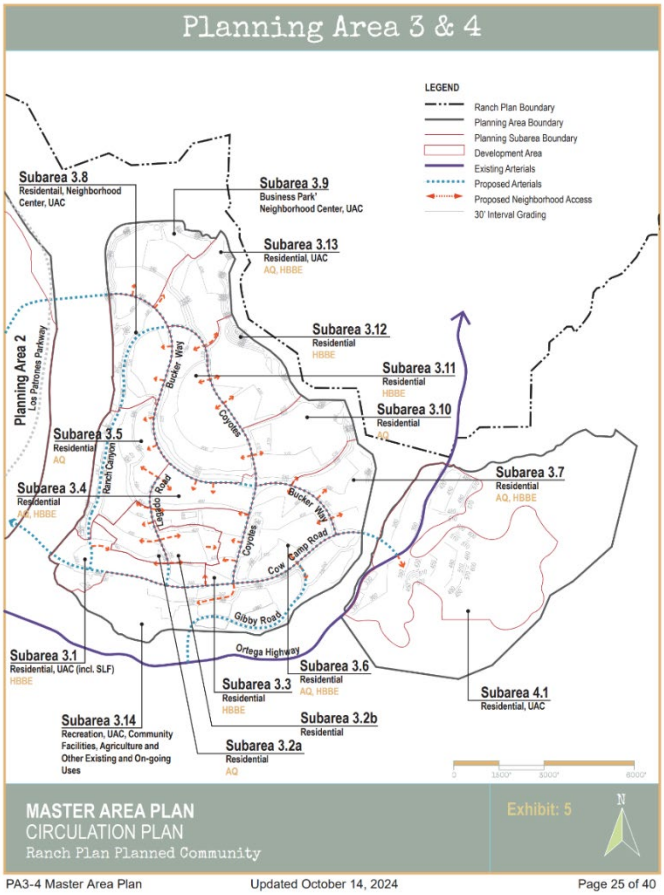
Master Plan Development in Orange County

Most residential development in Unincorporated Orange County that has occurred over the past 50 years has been in large-scale master planned communities. Unlike traditional zoning, Planned Community (PC) zoning provides certainty in the development process while allowing the property owner to maintain some degree of flexibility in the specific location of development. This type of zoning is more appropriate than traditional zoning because of the magnitude of the projects under a single ownership. Many planned communities in Orange County have encompassed thousands of acres developed over a period of several years. The County has a strong track record of negotiating the inclusion of affordable housing and completing these housing projects on large parcels or sites such as in the planned communities of Mission Viejo, Aliso Viejo, and Rancho Santa Margarita (20,618 total acreage), which later incorporated as cities, and Foothill Ranch, Talega, and Tonner Hills (5,230 total acreage), which were later annexed into the cities of Lake Forest, San Clemente, and Brea respectively

Planned Community zoning is more desirable than conventional zoning for large projects because it allows comprehensive, long-range planning for infrastructure while also providing the

development certainty needed for property owners to obtain the financing needed to pay for development and public improvements. It also eliminates the need for frequent zone changes that would be necessary under conventional zoning to make adjustments due to market conditions or other circumstances. Instead of a zone change that would require public hearings at the Planning Commission and Board of Supervisors, adjustments to unit counts and locations are typically processed either ministerially by staff, or with only Planning Commission approval. This flexibility simplifies the development review process and reduces total development cost.

Planning Area 3



PA3-4 Master Area Plan Updated October 14, 2024 Page 25 of 40

Rancho Mission Viejo is divided into a total of nine Master Plan Areas that are then divided into Subareas. The Master Area Plan focuses on a Planning Area in their entirety and addresses more regional topics/issues. The Subarea Plans focuses on segments of the Planning Area(s) and community level topics/issues.

The residential development capacity included in this Housing Element is limited to six sub areas within Planning Area 3 (PA3) as these areas are expected to be developed within the 2021-2029 6th Cycle Housing Element Planning Period and the capacity in those areas was included in the County's forecast of new construction and are reflected in OCP 2018, the dataset used by SCAG to determine the County's RHNA allocation.

Development Capacity and Schedule

The development capacity for this area is based on the entitlements currently under development. Therefore, no adjustment factors (for land use controls or site improvements) are applied. This capacity is distributed across six PA3 sub-areas, expected to develop within the current planning period (as shown in Figure B-16), with a total of 3,059 units. As mentioned earlier, only these PA3 subareas are included in the inventory as these areas are expected to be developed within the Planning Period and were included in the 2021-2029 RHNA Allocation Plan. Development in the following subareas is underway and expected to be completed within the planning period.

Subarea	Units	Status	Estimated Dates
3.2b	514	Entitled	Construction permits: 2025

3.3	450	Entitled	Construction permits: summer 2025
3.4	320	Entitled	Construction permits: summer 2025
3.5	740	Entitled	Construction permits: early 2026
3.6	675	Entitled	Construction permits: summer 2026
3.7	360	Entitled	Construction permits: 2028
Total	3,059		

Site Suitability: Affordability

As part of the General Plan amendment, Planned Community (zone change) and development agreement for Rancho Mission Viejo, the property owner is required to comply with the Affordable Housing Implementation Agreement (AHIA), as amended (2016), which includes the Private Sector Alternative discussed under Strategies and Action section which dedicated an aggregate of 60 gross acres of land to the County for affordable housing development. Per the Development Agreement, and subsequent Affordable Housing Implementation Agreement (AHIA), 165 very low- and low-income units will be produced in Planning Area 3. AB 1397 requires additional justification to include parcels larger than 10 acres in the sites inventory for lower-income housing. Because the development agreement requires inclusion of the 165 affordable units, site size is not a constraint. The PA3 sub-areas are already advancing through the development process and once the units are built, the appropriate parcelization will be in place.

A portion of housing proposed in Planning Area 3 will be multifamily housing. Site inventory estimates for Rancho Mission Viejo include 1,000 units affordable to moderate-income households based on expected development of these multifamily units. According to data provided by the developers, 28% of units (or 1,985 units) in Planning Area 3 will be multifamily. While the Plan estimates close to 2,000 multifamily units, only half (1,000) units are allocated to meet the moderate-income RHNA. While these units can be credited toward the lower-income RHNA, consistent with state law, they are instead credited, conservatively, to the moderate-income category. The Rancho Mission Viejo Planning Area 3 site is shown on **Figure B-14**.

Development Trends

Since the grand opening of Planning Area 1 in 2013, Rancho Mission Viejo and neighborhood builders have completed and sold/rented 1,247 housing units in Planning Area 1, of which 286 are deed-restricted senior housing (Age Qualified) units. In addition, 107 senior affordable apartments have been leased. Based on recent examples of developed multifamily projects in Rancho Mission Viejo, below, it is estimated that half of the units will be in development near or meet the default density of 30 du/ac.

- 1301 Lasso Way (2023): 12-unit multifamily building with a density of 30 du/ac.
- 38 Pasarela Drive (2020): 24-unit multifamily building with a density of 42 du/ac.

- Sendero Bluff Apartments, 30472 Gateway Place (2016): 107-unit multifamily building with a density of 39 du/ac.
- Esencia Norte Apartments 86 Esencia Drive (2016): 112-unit affordable, multifamily building with a density of 28 du/ac.
- Esencia Sur Apartments 92 Esencia Drive (2016): 150-unit multifamily building with a density of 27 du/ac.

Site Suitability: Size and Infrastructure Constraints

The parcels included in the site inventory for Rancho Mission Viejo are substantial in size, as they are currently in the subdivision process. The most current GIS mapping data shows that some parcels have been divided into smaller areas and as such the site inventory table (Table B-8) shows parcels with the same APN numbers. These are not duplicates, they are large parcels that have been divided into smaller areas. The PA3 sub-areas are already advancing through the development process, they are currently going through the final map process while concurrently submitting for construction permits, ensuring greater certainty regardless of parcel size. Once the units are built, the appropriate parcelization will be in place.

The Ranch Mission Viejo Planning Areas 3 and 4 Master Area Plan and Subarea Area Plans address infrastructure elements to ensure that the area will have adequate and sustainable support for the proposed development. The Master Plan and subplans include a timeline or phases for the implementation of infrastructure to align with the development's growth stages, ensuring that infrastructure is available as each phase progresses. It also includes an outline for the maintenance responsibilities of the infrastructure to ensure long-term operational sustainability. The PA3 sub-areas are already advancing through the development process and infrastructure needs have been addressed as part of that process.

County Development Support and Facilitation Measures

The County is committed to the following specific actions to facilitate its development.

- The County has designated the Manager Land Development as the primary point of contact for the developer to expedite applications and resolve issues that may arise.
- The Director, OC Community Resources/Housing is the primary designated contact for facilitating development of the sites to be dedicated for affordable housing.
- Affordable housing projects shall be approved administratively.
- The County will report annually to State HCD and the Board of Supervisors regarding progress toward the development of Rancho Mission Viejo and its affordable housing sites through a required Annual Monitoring Report.

Coyote Canyon

Coyote Canyon is a 375-acre former landfill property that is owned by the County of Orange. The site is located at 20661 Newport Coast Drive, between Bonita Canyon and San Joaquin Hills Roads, in the City of Newport Beach and within the County of Orange Sphere of Influence. A portion of the property (203 acres) is not subject to restrictions put in place regarding the former landfill use. This is the only portion of the property identified within the County's Housing Element Land Inventory. The full capacity of this site is included in the City of Newport Beach's 6th Cycle Housing Element. However, the County owns the land and has ultimate permitting authority for the site. In other words, if the site is to be redeveloped, including for residential purposes, it will be the County that authorizes such redevelopment. The site is not subject to regulation by the City of Newport Beach General Plan or zoning ordinance. There is no specific land use assigned to the property in the County's General Plan and zoning as the County does not assign zoning designations for properties outside of the Unincorporated County areas. The City of Newport Beach has included the site property in its General Plan and zoning map, however County-owned properties in other jurisdictions are not subject to the local zoning (intergovernmental immunity). In California, the doctrine of intergovernmental immunity means that County public works projects and permit decisions are not required to follow local general plans. This includes zoning, subdivision approvals, use permits, and public works.

According to research conducted by the City of Newport Beach, a developer has expressed written and verbal interest in developing a portion of the site at 60 du/acre. However, the County is estimating much lower densities (6.08 du/ac) based on previous experience with similar sites. The assumed full buildout at this lower density is projected at 1,234 units. Nevertheless, as with past projects within incorporated jurisdictions, the County is open to sharing equal credit for the developed units. While these densities are not considered appropriate to accommodate housing for lower-income households, the County is committed to including 30% of its total unit share as affordable units (618 total units including 186 units set aside for deed-restricted, affordable housing for lower-income [10%] and moderate-income households [20%]). Program 3 includes the County's commitment to include a portion of affordable units (186 units) on this site.

The City of Newport Beach has also identified the portion of the site that is suitable and feasible for structural and residential development. As with all development around former landfill sites, there are extensive processes and mitigation measures that must be taken to ensure safety. While siting buildings atop a landfill includes structural and environmental constraints, the interested developer believes both the structural and environmental constraints can be overcome with proven previously used techniques. The site would include methane mitigation systems ensuring the health and safety of future residents. An extensive analysis of site feasibility and site level due diligence has occurred on the site in consideration of the current environmental constraints. The analysis has concluded that the development potential (which is significantly higher than the development potential estimated in this site inventory) represents the most feasible opportunity for residential development. The identified site acreage suitable for residential development

identified in the County's site inventory, therefore, is a conservative representation of site development potential. The County's estimated development timeline for the site outlines entitlement approvals in 2025, construction commencement in 2026, and anticipated project completion by 2028.

- Entitlements: 2025
- Permitting: 2025-2026
- Construction: 2026-2028

The Coyote Canyon site is shown in **Figure B-11.**

Religious Institutions (No Rezoning)

The County has identified eight religious institutions in the Unincorporated County with potential for residential development. The site inventory is divided into two sections, as is the list of religious institution sites. This section includes five religious institution sites that already have the appropriate land use and zoning designations and did not require rezoning. The following section covers sites that required rezoning, including three religious institution sites within the Housing Opportunity Overlay (HOO). Although these HOO sites can be developed without rezoning, they are included in the rezoning section because the overlay offers significantly higher development potential.

Religious institutions sites are sites with churches or other religious institutions, with excess vacant property or large parking lots, that could accommodate residential development. SB 4, effective 2024, stipulates that faith-based organizations or nonprofit colleges must maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel. Throughout California, the development of affordable housing on religious properties has become an increasing trend. Nonprofit organizations such as Many Mansions and National CORE have assisted many religious facilities in incorporating housing on religious facility sites.

There has been significant expressed interest from church operations throughout Southern California to partner with nonprofit developers to provide affordable housing onsite. Typical development models involve churches providing a ground lease of the surplus or parking areas for affordable housing in exchange for lease payments, new facilities, and/or affordable units for staff. A program action (Program 4) is included in the Housing Plan for the City to support such opportunities.

For all six sites, no church buildings or driveway access areas are assumed to have development potential. These six sites were chosen because of the presence of unused undeveloped areas on their property, or because they had smaller portions of expansive parking or lawn areas that could be developed. Religious institutions with constraints, such as small size or limited parking/open areas, were either excluded or not selected from the analysis. In 2024, the religious institutions listed in Table B-5 were contacted to gauge their openness to housing development on their properties. They were informed that State law allows religious institutions to add housing without impacting current operations, removing existing buildings, or requiring rezoning, and that expressing interest would not commit them to any future development. They did not oppose inclusion in the inventory.

Combined, these six sites can yield 330 units on 12 acres of developable land. These churches can partner with nonprofit developers to provide affordable housing on the sites and receive parking relief to facilitate development. Because only affordable housing would qualify for the parking relief, the units are credited against the lower-income RHNA. If a density bonus was used, the number of units on the sites would increase significantly.

Table B-5
Summary of Religious Institutions Sites (No Rezoning Needed)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
Calvary Chapel of the Canyons	Canyons	4.5	1.5	33%	30 du/ac	45	The church property has an undeveloped/unused area in the rear that is included in the inventory. The church building and parking area are not included in the inventory.
Trinity United Presbyterian	North Tustin	9.0	1.0	11%	30 du/ac	30	The church property includes a large parking area that spans most of the outer perimeter of the site. Only a small portion of the parking area on the northwest side of the property is included in the inventory. The remaining parking area can accommodate the current use.
New Life Church	North Tustin	4.32	0.5	12%	30 du/ac	15	The church property includes a half-acre undeveloped/unused area on the side of the property that can accommodate development. Most of the site which includes a church building, parking lot, and a resources center for blind children is not included in the inventory.

Table B-5
Summary of Religious Institutions Sites (No Rezoning Needed)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
St Michael's Abbey	Canyons	122	6.0	5%	30 du/ac	180	St. Michael's Abbey is a large seminary, monastery, and church. The property includes three large parcels spanning 122 acres. Only one parcel is included as it is a stand-alone parcel that is undeveloped. It is located across the street from the developed portion of the site. To account for potential site improvements, only 75% of a stand-alone, undeveloped parcel is included in the inventory.
The Church of Jesus Christ of Latter-day Saints	Ladera Ranch	6.4	2.0	31%	30 du/ac	60	The church property includes a large lawn with only a medium size picnic table shelter at the end closest to the church buildings. The lawn is large, just under four acres and only half of that area is included in the inventory. The church building, half the lawn with picnic area, and parking area are not included in the inventory.

RHNA Shortfall

The County can meet more than half (55%) of the RHNA with approved and proposed projects, projected ADU development, and development of Rancho Mission Viejo, one County-owned site, and several religious institution sites. After accounting for this capacity, a shortfall of 4,719 units remains (**Table B-4**).

To address the shortfall, the County has identified various sites that, while appropriate for redevelopment and intensification, required zoning amendments that would increase residential development potential and serve as a significant incentive for redevelopment. Once appropriate zoning actions are taken, the County can accommodate the remaining RHNA.

RHNA Shortfall Site Requirements

Rezoning and used to address an unaccommodated, lower-income RHNA are subject to additional requirements under State law. Housing Element law (Government Code 65583.2[h]) requires that the County accommodate all the lower-income, unaccommodated RHNA on sites that are:

- Zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower-income households during the planning period; and
- Permit at least 16 units per site at a density of at least 20 units per acre

- At least half of the very low- and low-income housing need must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all the very low- and low-income housing need on sites designated for mixed-uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

Sites to accommodate the moderate- and above-moderate-income RHNA shortfall are *not* subject to these requirements. Sites that meet the density requirement but do not have a minimum capacity for 16 units are credited toward the moderate- and above-moderate-income RHNA shortfall.

Table B-6 summarizes the sites to be rezoned and shows that once appropriate zoning actions are taken, the County can adequately accommodate the remaining RHNA. All sites credited to the lower-income RHNA meet the shortfall requirements consistent with Government Code 65583.2[h]. A complete summary of sites to be rezoned is presented on **Table B-6** and **Figures B2** to **B-14**. A detailed listing of sites is included in **Table B-8** as required by State law.

Sites Requiring Rezoning

The incorporation and build-out of south Orange County have shifted the focus of residential development that is under the jurisdiction of the County to the older Unincorporated islands in the northern portion of the county. The "first wave" of development in these areas occurred during the 1950s and '60s as suburban growth spread south from Los Angeles. Fifty years later a few scattered vacant parcels remain, but there is also significant potential for redevelopment of underutilized properties with higher-density housing. The County of Orange's land inventory is different from most jurisdictions as it is continually shrinking due to annexations from incorporated cities within the County. While this is a common practice, it serves to deplete the available land the County can identify within the Housing Element. The most recent annexation occurred in September 2022. Approximately 265 acres of undeveloped, Unincorporated land (Tonner Hills Annexation Extension CA 03-12A) was annexed to the City Brea and the certificate of completion was issued in September 2022. This site would have been included in the County's 6th Cycle Land Inventory. It is anticipated this land will be developed into a planned community or specific plan with more than 1,100 units including at least 10% affordable to low- and moderate-income households.

Housing Opportunities Overlay Zone

The 2000 Housing Element included a Housing Action Plan item to designate such areas for higher-density development, and in 2006 the Housing Opportunities Overlay Zone (HOO) was adopted. The Housing Opportunities Overlay Zone (section 7-9-44.6) provides the option of affordable multifamily development on commercial and industrial sites, and in 2008 the Housing

Opportunities Overlay Zone was expanded to include properties that are conventionally zoned for multifamily development along arterial highways. The HOO requires that 100% of the units be reserved for lower-income households.

In 2020, the density of the HOO was increased from a maximum of 25 to 43.5 units per acre (not including density bonus units). In 2022, the maximum density of the HOO was again increased from 43.5 to 70 units per acre. Currently, the base density in all portions of the Housing Opportunities Overlay Zone is 70 units/acre. Program 1, most of which was completed 2024, amended the HOO to permit residential development at 70 dwelling units per acre for all zoning districts where it is permitted. To expand the opportunities for development of higher density, affordable housing, in 2024, the HOO was expanded to sites zoned multi-family residential, light industrial, and mixed-use and a 30 du/ac minimum density was implemented for all base zones within the HOO. Additionally, most of the base commercial zoning within the HOO was changed to Mixed-Use which does not allow for stand-alone non-residential uses and requires residential uses to comprise at least 50% of the total floor area. The County's commitment to facilitating and encouraging affordable housing development can be seen in these planning efforts.

As the County has an identified shortfall and the rezoning was done after the start of the 2021-2029 Housing Element Planning period, the following actions are considered a rezoning action even if they have already been completed:

- Increase the maximum density in the HOO to 70 du/ac
- Establish a minimum density in the Multifamily Dwellings (R2), Apartment (R3), Suburban Multifamily Residential (R4), Residential Profession (RP), or Mixed-Use (MX) zones of 30 dwelling units per acre
- Rezone properties with a zone designation of Local Business (C1), General Business (C2), Commercial Community (CC), Commercial Highway (CH), Commercial Neighborhood (CN), or Residential Profession (RP) to the new Mixed-Use (MX) zoning district
- Adding properties within the Multifamily Dwellings (R2), Apartment (R3), and Suburban Multifamily Residential (R4), Light Industrial (M1) and new Mixed-Use zoning districts to the Housing Opportunities Overlay (HOO), which provides opportunities and incentives for future affordable housing projects.

The 70 du/ac density for the HOO was determined based on discussions with the development community and others with local experience developing affordable housing within the County of Orange. This density allows increased flexibility in the type of development that may occur within these areas and presents additional opportunities for residential development. In July 2024, the County of Orange amended the associated development standards within the HOO to reflect development at 70 dwelling units per acre. Due to the nature of the HOO as described in

this section, all candidate housing sites within the HOO can be developed as 100% affordable to lower-income households.

As reflected in **Table B-14**, the HOO has been very successful in stimulating affordable housing development, with 8 new residential projects approved since 2007 and one project currently under development. As shown on **Table B-14**, with every density increase, the densities of developed affordable housing increased proportionally. Since 2007, housing projects in the HOO have averaged over 100% of allowable density and have resulted in 371 new affordable housing units.

The three projects that have been developed or approved since the start of the 5th RHNA cycle (2014) have achieved development densities over 125% of maximum allowable density. In 2022, Casa Paloma, a 71 units affordable projects achieved a density of 254% of maximum allowable density at the time of its approval (25 du/ac).

- Potter's Lane is a 16-unit affordable project in Midway City that was developed on a site previously in use as a single-family home. The project was developed on a site under half an acre in size and achieved a density of 39 du/ac on a site that had a maximum allowed density of 25 du/ac.
- Casa Paloma, a 71-unit multifamily affordable housing apartment community in accordance with the Housing Opportunities Overlay Zone Regulations. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The Casa Paloma project qualifies for the unlimited density bonus provision. The project's proximity to a major transit stop also permits use of modified parking standards. Government Code Section 65915 states that parking is not required for special needs housing and that the parking ratio shall not exceed 0.5 spaces per unit for the other affordable housing units. With these provisions, the project requires a total of 22 parking spaces, where a total of 28 parking spaces are provided. The project, approved in 2020, received its certificate of occupancy on September 29, 2022, and is currently in the pre-leasing process.
- Jackson Street, a 65-unit multifamily affordable housing apartment community in the Housing Opportunities Overlay Zone was developed at a density of 87.25 du/ac when the maximum allowed on the site was 70 du/ac. This is a density of 125% of the maximum allowed. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project qualified for the unlimited density bonus provision. The

project's proximity to a major transit stop also permits use of modified parking standards. The planning application for Jackson Street was approved in 2024.

Due to the small parcelization in older parts of the County such as in the Unincorporated islands, larger projects many times require lot consolidation. To incentivize affordable residential development, a graduated density increase is available for projects that consolidate multiple properties based on project size after lot consolidation.

- Less than 0.50 acre: 70 units per acre
- 0.50 to 0.99 acre: 77 units per acre (10% increase)
- acre or more: 84 units per acre (20% increase)

These densities apply to sites identified in the HOO regardless of base zoning density. As the County has increased the base density for R-2, R-3. R-4, and MX zones, all sites identified in the HOO require a 30 du/ac minimum density.

The HOO allows for residential development as a by-right use. All sites included in the site inventory allow affordable residential by-right and in the Mixed-Use District, stand-alone non-residential is not allowed. To facilitate the development of housing in the HOO, the Housing Opportunities Manual was created and provides guidelines for proposed projects and a description of the application submittal and review process. Along with development of the Housing Element and zoning amendments, the Housing Opportunities Manual has been updated to include minimum criteria, objective development standards, and clear procedural guidelines for all affordable housing projects.

Affordability is dependent on density allowed, capacity, and size. Sites allowing the State-designated default density standard (at least 30 du/ac) and meeting the shortfall requirement of accommodating at least 16 units are credited toward the lower-income RHNA. Sites meeting the default density standard (at least 30 du/ac) but under 0.5 acres in size are credited toward the moderate-income category as are sites that meet the density standard and are larger than 0.5 acres but cannot accommodate 16 units as required by the shortfall requirements. Realistic capacity methodology and affordability assumption are discussed after this section.

Table B-6
Summary of Rezoned Sites

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
HOO-Residential R-2	-	80	-	80
HOO-Residential R-3	103	39	-	142
HOO-Residential R-4	217	-	-	217
HOO-Mixed-Use	3,408	752	-	4,160
HOO-Other (M-1)	254	-	-	254

Table B-6
Summary of Rezoned Sites

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
HOO Religious Institution Sites	284	-	-	284
Total	**4,266**	**871**	**-**	**5,137**
RHNA Shortfall	*3,967*	*752*	*-*	*4,719*
RHNA Status: +Surplus/(Shortfall)	**+299**	***+119***	**+773**	***+1,257***

HOO - Underutilized Infill Parcels

The County has identified 150 parcels that can be grouped into 59 sites for redevelopment to add new housing or to redevelop with a significantly higher number of units. Only two parcels are vacant and as such this discussion focuses on underutilized sites. Combined, sites in the HOO can accommodate 5,137 units (4,266 lower-income units and 871 moderate-income units. Maximum allowable density (ranging from 77 to 84 du/ac) is assumed, and that approach is described in detail in the methodology section.

HOO with Residential Zoning:

- Three **HOO-R2** sites (five parcels) are included in the inventory and only one is comprised of multiple parcels (the three parcels are under common ownership). Although the three sites can accommodate at least 16 units, none are credited toward the lower-income RHNA as they are considered small sites (under 0.5 acres in size).
- Four **HOO-R3** sites (nine parcels) are included in the inventory and two of the sites are comprised of multiple parcels. The two multi-parcel sites are included as they are developed with single family units in an area where multifamily development is predominant. These sites are larger than typical single-family properties of a size that can accommodate a multifamily development. The allowable HOO density allows for 13 to 25 times the number of current units developed. The two stand-alone sites are located along Bolsa Avenue and developed with older, less intense commercial uses with lower lot coverage and signs of deferred maintenance.
- Five **HOO-R4** sites (14 parcels) are included in the inventory and four of the sites are comprised of multiple parcels. These four multi-parcel sites are either fully or partially under common ownership (for example 5 parcels with two owners). The multi-parcel sites are included as they are developed with single family on relatively large lots (low lot coverage). One site has one unit over three parcels and limited lot improvement. Another site has 2 units over four parcels with large

undeveloped areas. On the single-parcel site, the allowable HOO density allows for ten times the number of current units (4 units).

HOO with Mixed-Use Zoning:

- There are 42 **HOO-MX** sites (116 parcels) included in the inventory. Sixteen sites are single-parcel sites and 26 are multi-parcel sites. Thirteen of the multi-parcel sites are either fully or partially under common ownership (for example 5 parcels with two owners). To leverage the potential for development presented by the area's underutilization, the properties have been rezoned to the Mixed-Use district as part of the 2024 zoning amendment. Stand-alone residential uses are allowed in the mixed-use zone, but stand-alone non-residential development is not allowed, and all projects on the shortfall sites are required to include 50% residential uses. This approach addresses the issue of the potential for non-residential development and shows that the capacity identified is realistic and achievable.

  The largest grouping of HOO-MX sites is in the Midway City islands (generally near the corner of Bolsa Avenue and Beach Boulevard). In the area southeast of Bolsa and Beach, there are many underutilized properties in use as auto repair and smaller, independent auto sales businesses with large surface lot area for car storage. Along Bolsa Avenue, properties in use as commercial uses were identified as the uses were older, smaller scale with signs of deferred maintenance or lack of visual signs of improvements. This area is adjacent to residential uses on the north and east side and has seen increased interest in redevelopment. Three affordable, higher density, housing developments have been built or are under development (the 16-unit Potter's Lane project, the 71-unit Casa Paloma, and the 63-unit Jackson Street project). Due to the size of many of the sites, higher densities can be achievable for projects over a half-acre in size. Several sites north of the Bolsa Avenue frontage properties are selected due to their underutilization. The sites have single-family units but are in areas that are predominately multifamily. The sites are located along or near two major regional roads (Bolsa Avenue and Beach Boulevard) and just one mile from I-405, which connects Orange County to major employment areas in Orange and Los Angeles counties. All sites in this area fall within a High-Quality Transit Area (HQTA) which provides additional incentives (parking relief) for development of high-density housing.

  A second large grouping is in the Anaheim/Stanton Islands (generally north of Katella Avenue and west of Brookhurst Street). In this area, the sites are currently in use as small-scale commercial uses, many in uses as older, smaller-scale, strip commercial centers with large undeveloped areas for storage or parking, single family homes (in multifamily neighborhoods where development regulations allow a 10-to-20-fold increase in units). Most sites are located along or at the intersection

of major roads which are ideal for high density development as it offers easier access to the site. Most of the sites in this area fall within a HQTA which provides additional incentives for development of high-density housing.

There are three HOO-MX sites, that are also stand-alone parcel sites with no lot consolidation assumed, that are over 4 acres in size and can be credited toward the lower-income RHNA. However, to account for the potential of mixed-income housing on these relatively larger sites, affordability for these three sites has been split between lower-income and moderate-income RHNA. This approach is described in detail in the methodology section.

HOO with Other Zoning:

- Two **HOO-M1** sites (3 parcels) are included in the inventory. The sites are large, and the current uses are commercial industrial businesses. The larger site (1.6 acres) has two small structures, and the rest is an unimproved lot area used to store old cars and truck containers. The sites are located at the edge of a residential area and next to a multifamily neighborhood. These two sites have the potential to accommodate 254 units (and potentially more if a density bonus is used). These two sites are the only non-residential, non-mixed-use sites but they are included as the size of the properties, location in a residential area, and easy regional access make them ideal for future housing development. For sites located within a commercial or industrial zoning district such as M-1, the site development standards for the R3 "Apartment" District apply except that the base density shall be 70 dwelling units per acre (net development area).

HOO Religious Institutions

The County has identified eight religious institutions in the Unincorporated County with potential for residential development. The site inventory is divided into two sections, as is the list of religious institution sites. The previous section included five religious institution sites that already have the appropriate land use and zoning designations and did not require rezoning. This section covers sites that required rezoning, including three religious institution sites within the Housing Opportunity Overlay (HOO). Although these HOO sites can be developed without rezoning, they are included in this rezoning section because the overlay offers significantly higher development potential.

For all sites, no church buildings or driveways access areas are assumed to have development potential. These three sites were chosen because that had unused/undeveloped areas on their property, or because they had smaller portions of expansive parking or lawn areas that could be developed. Religious institutions with constraints, such as small size or limited parking/open areas, were either excluded or not selected from the analysis. In 2024, the religious institutions

listed in Table B-7 were contacted to gauge their openness to housing development on their properties. They were informed that State law allows religious institutions to add housing without impacting current operations, removing existing buildings, or requiring rezoning, and that expressing interest would not commit them to any future development. They did not oppose inclusion in the inventory.

Combined, these three sites can yield 283 units on 3.4 acres of developable land. Maximum allowable density (ranging from 77 to 84 du/ac) is assumed, and that approach is described in detail in the methodology section. These churches can partner with nonprofit developers to provide affordable housing on the sites and receive parking relief to facilitate development. Because only affordable housing would qualify for the parking relief, the units are credited against the lower-income RHNA. If a density bonus was used, the number of units on the sites would increase significantly.

As stated earlier, there has been significant expressed interest from church operations throughout Southern California to partner with nonprofit developers to provide affordable housing onsite. Typical development model involves the church to provide a ground lease of the surplus or parking areas for affordable housing in exchange for lease payments, new facility, and/or affordable units for staff. An action (Program 4) is included in the Housing Plan for the County to support such opportunities.

Table B-7
Summary of Religious Institutions Sites (HOO Rezoning)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
Bethlehem Evangelical	Rossmoor	2.1	1	47%	77-84 du/ac (2 parcels)	89	The property includes a church building with parking lots on both sides and a small lawn. Only half the site is included, which leaves room for the parking lot on one half of the property. The church buildings, small lawn and a portion of the parking area is not included in the inventory.
La Purisima Church	El Modena	7.8	1.8	23%	84 du/ac	153	This is a large (7 parcel) property with a church, school and other buildings. The property also includes a large parking lot and a lawn. Only the northernmost, stand-alone, 1.8-acre parcel is included in the inventory, and it is currently used as a lawn and a small portion of parking. lot. Due to the size of the property, there are ample parking lots which would provide flexibility for placement of a residential component. The church and school buildings and most of the parking area is not included in the inventory.

Table B-7
Summary of Religious Institutions Sites (HOO Rezoning)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
Saint Justin Martyr Church - Sacred Mission	Anaheim Stanton	1.1	0.5	48%	77 du/ac	41	The church property is made up of two non-adjacent parcels. Only one parcel is included in the inventory as it is used only for parking. The church is small, and its primary use is a food pantry. The church and food pantry buildings are not included in the inventory.

RHNA Status

The complete sites inventory identified in this chapter (including credits, ADU projections, sites in place, and sites that required rezoning actions) totals 11,597 units, 5,304 units of which are in the very low- and low-income RHNA categories. Overall, the County can adequately accommodate—and have excess capacity—to accommodate the RHNA as all rezoning actions are completed (July 2024).

Compliance with State Law

Reuse of 5th Cycle Sites

Vacant sites identified in the previous two Housing Elements and non-vacant sites identified in the previous Housing Element are not subject to the reuse provisions of Government Code 65583.2(c). The code requires that these previously used, lower-income sites be zoned at residential densities consistent with the default density established by HCD (30 units per acre) and the site allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households. Because all lower-income sites that were previously used are identified in **Table B-8** have been rezoned as part of the County's 2024 zoning amendments to require a 30 du/ac minimum density and allow affordable housing by-right for projects with at least 20% as part of the RHNA shortfall requirements, they are exempt from this requirement. Non-vacant sites identified in the previous Housing Element but credited toward the moderate- or above-moderate-income RHNA in the current Housing Element are not subject to the reuse provisions.

Moderate and Above Moderate Income Site Requirement

For jurisdictions that are considered Metropolitan, State law requires that the element identify at least 25 percent of the remaining moderate- and above-moderate- RHNA on sites that allow at least four units of housing (e.g., four-plex or greater). (Gov. Code, § 65583.2, subd. (c)(4).) After accounting for projects completed or under development, and ADU estimates, the remaining

moderate need is 1,876 units, and the remaining above-moderate need is 1,553 units. There is capacity for 871 units in HOO residential and mixed-use zones to accommodate more than 25% (461 units) of the remaining moderate-income need. These sites require a minimum density of 30 du/ac and all sites can accommodate more than 4 units. The remaining above-moderate-income need is addressed through development of the Rancho Mission Viejo Master Plan and one County-owned site, Coyote Canyon that have a combined capacity of over 4,700 units. Both sites allow a variety of housing types.

No Net Loss

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify at the time of approval the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project.

Site Inventory Table and Maps

Table B-8 presents a detailed listing of each candidate housing site within the County of Orange's sites inventory and **Figures B-2** to **B-14** show the locations. The sites are identified by assessor parcel number (APN) as well as a unique identifier used to track sites (which may include more than one parcel) within the inventory. The site inventory methodology is discussed after this section.

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
1, 2, 6, 7, 8	BA	HOO - M1	Orange/Olive	360-382-18	1.61	OLIVE AND MAIN ST	Res 1B	M1	No Change	Commercial	30	84	135	0	0	135	NO	N
1, 2, 6, 8	BB	HOO - M1	Orange/Olive	360-384-04	0.70	2875 N ORANGE OLIVE RD	Res 1B	M1	No Change	Commercial	30	77	54	0	0	54	NO	N
	BB	HOO - M1	Orange/Olive	360-384-05	0.84	2911 N ORANGE OLIVE RD	Res 1B	M1	No Change	Commercial	30	77	65	0	0	65	NO	Y
1, 2, 6, 7	C	HOO - MX	Anaheim/Stanton	127-241-35	0.26	791 W STONYBROOK DR	Res 1B	C1	MX	Commercial	30	70	0	18	0	18	NO	N
1, 2, 6, 7, 8	D	HOO - MX	Anaheim/Stanton	127-242-18	0.26	801 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	70	0	18	0	18	NO	N
1, 2, 4, 6, 7, 8	E	HOO - MX	Anaheim/Stanton	126-503-27	0.45	8885 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	0	31	0	31	YES	Y
1, 2, 3, 6, 8	F	HOO - MX	Anaheim/Stanton	127-092-24	0.59	331 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	77	45	0	0	45	NO	Y
	F	HOO - MX	Anaheim/Stanton	127-092-25	0.56	9291 S BROOKHURST	Res 1B	C1	MX	Commercial	30	77	43	0	0	43	NO	Y
	F	HOO - MX	Anaheim/Stanton	127-092-32	1.06	305 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	84	89	0	0	89	NO	Y
1, 2, 6, 8	G	HOO - MX	Anaheim/Stanton	127-341-59	0.20	10012 GILBERT ST	Res 1B	C1	MX	Residential, 1 unit	30	70	14	0	0	14	NO	N
	G	HOO - MX	Anaheim/Stanton	127-341-60	0.38	10042 GILBERT ST	Res 1B	C1	MX	Residential, 1 unit	30	70	27	0	0	27	NO	N
	G	HOO - MX	Anaheim/Stanton	127-341-61	0.13	9512 BALL RD	Res 1B	C1	MX	Commercial	30	70	9	0	0	9	NO	N
1, 2, 4, 6, 8	H	HOO - MX	Anaheim/Stanton	127-621-08	0.47	9041 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	33	0	0	33	YES	N
	H	HOO - MX	Anaheim/Stanton	127-621-09	0.23	10962 MAGNOLIA AVE	Res 1B	C1	MX	Commercial	30	70	16	0	0	16	YES	N
	H	HOO - MX	Anaheim/Stanton	127-621-10	0.34	9001 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	24	0	0	24	YES	Y
2, 3, 6, 7	N	HOO - MX	El Modena	393-390-12	7.82	10000 CRAWFORD CANYON RD	Res 1B	CC	MX	Commercial	30	84	164	164	0	328	NO	N
1, 2, 3, 6, 7	O	HOO - MX	El Modena	393-390-13	2.23	10000 CRAWFORD CANYON RD	Res 1B	CC	MX	Commercial	30	84	187	0	0	187	NO	N
1, 2, 4, 6, 7, 8	P	HOO - MX	El Modena	093-114-01	0.38	11924 EARLHAM ST	Res 1B	C1	MX	Commercial	30	70	0	26	0	26	YES	N
1, 2, 4, 6, 7, 8	Q	HOO - MX	El Modena	093-113-10	0.17	11941 EARLHAM ST	Res 1B	C2	MX	Commercial	30	70	12	0	0	12	YES	N
	Q	HOO - MX	El Modena	093-113-15	0.17	18541 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	12	0	0	12	YES	N
	Q	HOO - MX	El Modena	093-113-21	0.63	18511 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	77	48	0	0	48	YES	N
	Q	HOO - MX	El Modena	093-113-23	0.13	18551 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	9	0	0	9	YES	N
	Q	HOO - MX	El Modena	093-113-25	0.13	18561 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	9	0	0	9	YES	N
	Q	HOO - MX	El Modena	093-113-27	0.26	18571 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	18	0	0	18	YES	N
1, 2, 4	AA	HOO - MX	Midway City	097-144-08	0.17	8421 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AA	HOO - MX	Midway City	097-144-09	0.20	8441 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	14	0	0	14	YES	Y
	AA	HOO - MX	Midway City	097-144-19	0.27	8451 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	19	0	0	19	YES	Y
1, 2, 4, 6, 7, 8	AB	HOO - MX	Midway City	097-132-15	0.21	8101 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	15	0	0	15	YES	Y
	AB	HOO - MX	Midway City	097-132-23	0.17	8061 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AB	HOO - MX	Midway City	097-132-24	0.16	8071 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AB	HOO - MX	Midway City	097-132-25	0.08	8081 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	6	0	0	6	YES	N
	AB	HOO - MX	Midway City	097-132-25	0.08	8081 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	6	0	0	6	YES	N
	AC	HOO - MX	Midway City	107-153-10	0.23	15022 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	0	16	0	16	YES	N

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
1, 2, 3, 4, 6, 7, 8	AC	HOO - MX	Midway City	107-153-11	0.11	8042 BOLSA	Comm 2A	C2	MX	Commercial	30	70	0	8	0	8	YES	N
	AC	HOO - MX	Midway City	107-153-12	0.11	15022 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	0	8	0	8	YES	N
1, 2, 3, 4, 6, 8	AD	HOO - MX	Midway City	107-180-03	0.59	15032 JACKSON ST	Res 1C	C2	MX	Commercial	30	77	45	0	0	45	YES	N
	AD	HOO - MX	Midway City	107-180-24	0.36	8122 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	25	0	0	25	YES	Y
	AD	HOO - MX	Midway City	107-180-28	0.24	8180 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	17	0	0	17	YES	Y
1, 2, 3, 4, 6, 7, 8	AE	HOO - MX	Midway City	107-152-12	0.42	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	30	0	0	30	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.39	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	27	0	0	27	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.15	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	11	0	0	11	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.17	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	12	0	0	12	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.17	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	12	0	0	12	YES	N
	AE	HOO - MX	Midway City	107-152-12	0.18	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	N
1, 2, 4, 6, 7, 8	AF	HOO - MX	Midway City	107-151-42	0.23	15052 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	16	0	0	16	YES	N
	AF	HOO - MX	Midway City	107-151-54	0.31	15041 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
	AF	HOO - MX	Midway City	107-151-68	0.19	15062 ADAMS ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	N
	AF	HOO - MX	Midway City	107-151-68	0.18	15062 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	N
1, 2, 3, 4, 6, 7, 8	AG	HOO - MX	Midway City	097-142-22	0.30	8301 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	21	0	0	21	YES	Y
	AG	HOO - MX	Midway City	097-142-23	0.45	8331 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	31	0	0	31	YES	Y
1, 2, 4, 6, 8	AH	HOO - MX	Midway City	142-062-15	0.35	15451 BEACH BLVD	Res 1B	C1	MX	Commercial	30	70	25	0	0	25	YES	Y
	AH	HOO - MX	Midway City	142-062-17	2.26	15401 BEACH BLVD	Res 1B	C1	MX	Commercial	30	84	190	0	0	190	YES	N
	AH	HOO - MX	Midway City	142-062-18	0.55	15441 BEACH BLVD	Res 1B	C1	MX	Commercial	30	77	43	0	0	43	YES	N
1, 2, 4, 6, 7, 8	AI	HOO - MX	Midway City	107-151-02	0.31	15021 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
	AI	HOO - MX	Midway City	107-151-06	0.19	15032 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
	AI	HOO - MX	Midway City	107-151-55	0.17	15031 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AI	HOO - MX	Midway City	107-151-56	0.25	15012 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	18	0	0	18	YES	N
1, 2, 3, 4, 6, 8	AJ	HOO - MX	Midway City	107-180-25	0.62	15062 JACKSON ST	Res 1C	C2	MX	Commercial	30	77	48	0	0	48	YES	Y
	AJ	HOO - MX	Midway City	107-180-33	0.19	15081 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
	AJ	HOO - MX	Midway City	107-180-34	0.19	15082 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
1, 2, 3, 4, 6, 7, 8	AK	HOO - MX	Midway City	107-151-15	0.41	15161 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AK	HOO - MX	Midway City	107-151-37	0.19	15101 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
	AK	HOO - MX	Midway City	107-151-38	0.28	15111 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	20	0	0	20	YES	Y
	AK	HOO - MX	Midway City	107-151-45	0.40	15135 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	28	0	0	28	YES	Y
	AK	HOO - MX	Midway City	107-151-47	0.34	15132 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	24	0	0	24	YES	Y
	AK	HOO - MX	Midway City	107-151-48	0.28	15131 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	20	0	0	20	YES	Y
	AK	HOO - MX	Midway City	107-151-51	0.32	15114 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
	AK	HOO - MX	Midway City	107-151-52	0.16	15092 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	11	0	0	11	YES	Y
	AL	HOO - MX	Midway City	107-180-09	0.37	15132 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	26	0	0	26	YES	Y

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
1, 2, 3, 4, 6, 8	AL	HOO - MX	Midway City	107-180-10	0.37	15142 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	26	0	0	26	YES	Y
	AL	HOO - MX	Midway City	107-180-29	0.19	15112 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
	AL	HOO - MX	Midway City	107-180-30	0.19	15111 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
1, 2, 3, 4, 6, 7, 8	AM	HOO - MX	Midway City	107-151-20	0.41	15201 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AM	HOO - MX	Midway City	107-151-21	0.41	15211 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AM	HOO - MX	Midway City	107-151-67	0.14	15300 BEACH BLVD	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
	AM	HOO - MX	Midway City	107-151-67	0.14	15300 BEACH BLVD	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
	AM	HOO - MX	Midway City	107-151-67	0.55	15300 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	77	42	0	0	42	YES	N
1, 2, 3, 4, 6, 8	AN	HOO - MX	Midway City	107-151-30	0.41	15212 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AN	HOO - MX	Midway City	107-151-59	0.28	15232 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	19	0	0	19	YES	N
1, 2, 3, 4, 6, 8	AO	HOO - MX	Midway City	107-180-14	0.14	15231 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	AO	HOO - MX	Midway City	107-180-15	0.30	15222 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	21	0	0	21	YES	Y
	AO	HOO - MX	Midway City	107-180-16	0.15	8161 ELMORE WAY	Res 1C	C2	MX	Residential, 2 units	30	70	11	0	0	11	YES	Y
	AO	HOO - MX	Midway City	107-180-17	0.15	15232 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	11	0	0	11	YES	Y
1, 2, 4, 6, 7, 8	AP	HOO - MX	Midway City	107-151-31	0.41	15122 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AP	HOO - MX	Midway City	107-151-32	0.41	15142 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
	AP	HOO - MX	Midway City	107-151-33	0.41	15132 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
1, 2, 3, 4, 6, 8	AQ	HOO - MX	Midway City	107-151-19	0.41	15191 JACKSON ST	Comm 2A	C2	MX	Residential, 1 unit	30	70	29	0	0	29	YES	Y
	AQ	HOO - MX	Midway City	107-151-43	0.21	15180 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	14	0	0	14	YES	Y
	AQ	HOO - MX	Midway City	107-151-44	0.21	15181 JACKSON ST	Res 1C	C2	MX	Residential, 1 unit	30	70	14	0	0	14	YES	Y
1, 2, 3, 4, 6, 7, 8	AR	HOO - MX	Midway City	107-180-31	0.57	15201 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	77	44	0	0	44	YES	Y
	AR	HOO - MX	Midway City	107-180-32	0.17	15202 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
1, 2, 4, 6, 8	AS	HOO - MX	Midway City	097-134-09	0.17	8181 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AS	HOO - MX	Midway City	097-134-10	0.14	8191 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	AS	HOO - MX	Midway City	097-134-12	0.17	8225 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
	AS	HOO - MX	Midway City	097-134-25	0.25	8207 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	17	0	0	17	YES	Y
1, 2, 3, 6, 7, 8	V	HOO - MX	Midway City	097-103-31	0.85	14582 BEACH BLVD	Res 1C	C2	MX	Commercial	30	77	66	0	0	66	YES	Y
1, 2, 3, 4, 6, 7, 8	W	HOO - MX	Midway City	097-133-21	0.41	8121 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	0	29	0	29	YES	Y
1, 2, 3, 4, 6, 7, 8	X	HOO - MX	Midway City	144-251-08	0.44	16292 S HARBOR BLVD	Res 1C	C1	MX	Commercial	30	70	0	31	0	31	YES	Y
1, 2, 4, 6, 8	Y	HOO - MX	Midway City	097-141-09	0.15	8241 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Y	HOO - MX	Midway City	097-141-10	0.15	8249 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Y	HOO - MX	Midway City	097-141-11	0.15	8261 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Y	HOO - MX	Midway City	097-141-12	0.15	8271 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Y	HOO - MX	Midway City	097-141-13	0.15	8295 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Z	HOO - MX	Midway City	097-143-10	0.15	8371 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
1, 2, 3, 4, 6, 7, 8	Z	HOO - MX	Midway City	097-143-11	0.15	8381 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Z	HOO - MX	Midway City	097-143-12	0.15	8391 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
	Z	HOO - MX	Midway City	097-143-13	0.15	14951 HARPER ST	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
1, 3, 6, 7, 8	BC	HOO - MX	Orange/Olive	360-031-23	5.12	15777 E LINCOLN AVE	Res 1B	C2	MX	Commercial	30	84	215	215	0	430	NO	Y
1, 2, 7, 8	BD	HOO - MX	Orange/Olive	360-011-12	2.31	15631 E LINCOLN AVE	Res 1B	CH	MX	Commercial	30	84	194	0	0	194	NO	Y
1, 2, 6, 7, 8	BI	HOO - MX	Rossmoor	086-521-24	0.52	11171 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	77	40	0	0	40	NO	N
1, 2, 7	BJ	HOO - MX	Rossmoor	086-521-23	1.13	11131 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	84	95	0	0	95	NO	N
1, 2, 7, 8	BK	HOO - MX	Rossmoor	086-521-46	1.35	11031 LOS ALAMITOS BLVD	Res 1B	C1	MX	Commercial	30	84	113	0	0	113	NO	N
1, 2, 3, 6, 7, 8	BL	HOO - MX	Rossmoor	086-521-48	4.47	11081 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	84	188	188	0	376	NO	N
1, 3, 6, 7	BN	HOO - MX	Yorba Linda Fairmont	349-693-39	0.51	CA-90 and ESPERANZA	Res 1B	CH	MX	Vacant	30	77	40	0	0	40	NO	N
1, 2, 6, 8	BO	HOO - MX	Yorba Linda Fairmont	349-071-21	0.25	19651 ESPERANZA RD	Res 1B	C1	MX	Residential, 1 unit	30	70	18	0	0	18	NO	Y
	BO	HOO - MX	Yorba Linda Fairmont	349-071-24	0.24	19721 ESPERANZA RD	Res 1B	C1	MX	Commercial	30	70	17	0	0	17	NO	Y
	BO	HOO - MX	Yorba Linda Fairmont	349-071-25	0.30	19741 ESPERANZA RD	Res 1B	C1	MX	Residential, 1 unit	30	70	21	0	0	21	NO	Y
	BO	HOO - MX	Yorba Linda Fairmont	349-071-26	0.49	19701 ESPERANZA RD	Res 1B	C1	MX	Commercial	30	70	34	0	0	34	NO	Y
1, 3, 4, 7	I	HOO - R2	Anaheim/Stanton	127-562-01	0.26	10741 GARZA AVE	Res 1B	R2D	R2	Vacant	30	70	0	18	0	18	YES	N
1, 2, 3, 4, 6, 7, 8	J	HOO - R2	Anaheim/Stanton	127-573-21	0.26	10961 GILBERT ST	Res 1B	R2D	R2	Residential, 1 unit	30	70	0	18	0	18	YES	N
	J	HOO - R2	Anaheim/Stanton	127-573-22	0.12	9441 KATELLA AVE	Res 1B	R2D	R2	Commercial	30	70	0	8	0	8	YES	N
	J	HOO - R2	Anaheim/Stanton	127-573-23	0.06	9441 KATELLA AVE	Res 1B	R2D	R2	Commercial	30	70	0	4	0	4	YES	N
1, 2, 4, 6, 7, 8	AT	HOO - R2	Midway City	142-031-26	0.46	7852 BOLSA AVE	Res 1C	R2	No Change	Commercial	30	70	0	32	0	32	YES	N
1, 2, 4, 6, 7, 8	AU	HOO - R3	Midway City	097-132-16	0.37	14941 JACKSON ST	Res 1C	R3	No Change	Commercial	30	70	0	26	0	26	YES	N
1, 2, 4, 6, 7, 8	AV	HOO - R3	Midway City	097-133-08	0.19	14942 JACKSON ST	Res 1C	R3	No Change	Commercial	30	70	0	13	0	13	YES	N
1, 3, 4, 6, 8	AW	HOO - R3	Midway City	097-134-01	0.18	14862 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AW	HOO - R3	Midway City	097-134-04	0.18	14892 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AW	HOO - R3	Midway City	097-134-26	0.36	14872 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	25	0	0	25	YES	N
1, 3, 4, 6, 8	AX	HOO - R3	Midway City	097-142-14	0.18	14941 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AX	HOO - R3	Midway City	097-142-15	0.18	14931 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AX	HOO - R3	Midway City	097-142-16	0.18	14921 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
	AX	HOO - R3	Midway City	097-142-17	0.18	14901 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
1, 2, 4, 6, 7, 8	R	HOO - R4	El Modena	383-061-01	0.51	11578 HEWES ST	Res 1B	R1	R4	Residential 4 units	30	77	40	0	0	40	YES	N
1, 2, 6, 7, 8	BE	HOO - R4	Orange/Olive	360-364-03	0.18	8621 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	13	0	0	13	NO	N

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
	BE	HOO - R4	Orange/Olive	360-364-04	0.15	16721 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	N
	BE	HOO - R4	Orange/Olive	360-364-05	0.15	16711 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y
	BE	HOO - R4	Orange/Olive	360-364-06	0.15	16701 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y
	BE	HOO - R4	Orange/Olive	360-364-07	0.15	16691 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y
1, 2, 3, 7, 8	BF	HOO - R4	Orange/Olive	360-364-01	0.40	8571 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	28	0	0	28	NO	Y
	BF	HOO - R4	Orange/Olive	360-364-02	0.18	8581 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	13	0	0	13	NO	N
1, 2, 6, 8	BG	HOO - R4	Orange/Olive	360-365-01	0.17	8631 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
	BG	HOO - R4	Orange/Olive	360-365-02	0.17	8641 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
	BG	HOO - R4	Orange/Olive	360-365-03	0.17	8651 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
1, 2, 3, 6, 7, 8	BH	HOO - R4	Orange/Olive	360-361-09	0.20	8582 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	14	0	0	14	NO	Y
	BH	HOO - R4	Orange/Olive	360-361-11	0.24	8500 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	17	0	0	17	NO	N
	BH	HOO - R4	Orange/Olive	360-361-12	0.24	8500 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	16	0	0	16	NO	N
1, 2, 7	BM	HOO CHURCH - MX	Rossmoor	086-521-11	0.95	11088 WALLINGSFORD RD	Res 1B	C2	MX	Educational/institutional/religious	0	84	40	0	0	40	NO	N
	BM	HOO CHURCH - MX	Rossmoor	086-521-19	1.17	3352 KATELLA AVE	Res 1B	C2	MX	Educational/institutional/religious	0	84	49	0	0	49	NO	N
1, 2, 3, 4, 6, 7	K	HOO CHURCH - R2	Anaheim/Stanton	127-572-25	0.53	10841 HARCOURT AVE	Res 1B	R2D	R2	Educational/institutional/religious	0	77	41	0	0	41	YES	N
1, 2,3 ,4 ,6 ,7	S	HOO CHURCH - R4	El Modena	383-061-02	1.83	11712 Hewes St	Res 1B	R1	R4	Educational/institutional/religious	0	84	154	0	0	154	YES	N
1, 2, 3, 7	L	NON HOO - CHURCH	Canyons	105-060-26	4.49	8002 SILVERADO CANYON RD	Res 1A	A1	No Change	Educational/institutional/religious	0	84	45	0	0	45	NO	N
2, 3, 6, 7	M	NON HOO - CHURCH	Canyons	105-051-84	8.28	27977 SILVERADO CANYON RD	Res 1A	A1	No Change	Educational/institutional/religious	0	84	180	0	0	180	NO	N
2, 3, 7	U	NON HOO - CHURCH	Ladera Ranch	780-041-01	6.39	26176 ANTONIO PKWY	Res 1B	SP	No Change	Educational/institutional/religious	0	84	60	0	0	60	NO	N
1, 2	AY	NON HOO - CHURCH	North Tustin	401-171-05	4.32	18542 VANDERLIP AVE	Res 1B	SP - PQP	No Change	Educational/institutional/religious	0	84	15	0	0	15	NO	N
5, 7	A	COYOTE CANYON	Newport Beach	120-571-11	15.54	CA-73 and Newport Coast Dr	N/A	N/A	N/A	vacant former landfill	0	0	0	0	0	0	NO	N
	A	COYOTE CANYON	Newport Beach	120-571-13	335.07	CA-73 and Newport Coast Dr	N/A	N/A	N/A	vacant former landfill	0	0	62	124	432	618	NO	N
2	AZ	NON HOO - CHURCH	North Tustin	395-401-02	9.41	13922 PROSPECT AVE	Res 1B	R1	No Change	Educational/institutional/religious	0	84	30	0	0	30	NO	N

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
3, 5, 7	B	RMV Master Plan	Mission Viejo	125-165-34	62.38	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	165	1000	3001	4166	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-35	63.67	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-36	63.67	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.40	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	NA	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.33	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.02	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.40	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.30	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	63.06	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.14	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.00	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.65	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	63.53	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	64.98	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.37	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.38	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	60.80	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.82	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	61.02	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.39	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	63.68	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	60.79	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	63.68	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-42	62.23	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.23	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N

Table B-8
Orange County Candidate Housing Site Inventory

Site Suitability Criteria*	Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
													Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
	B	RMV Master Plan	Mission Viejo	125-165-51	52.47	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	62.48	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-51	168.88	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	60.61	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	60.49	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	63.69	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
	B	RMV Master Plan	Mission Viejo	125-165-52	62.01	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N

* Site Suitability Criteria is discussed in the Sites Methodology section further in this chapter.

Figure B-2
County of Orange Candidate Sites
Unincorporated Area: Orange/Olive



Figure B-3
County of Orange Candidate Sites
Unincorporated Area: Anaheim (Area 1)

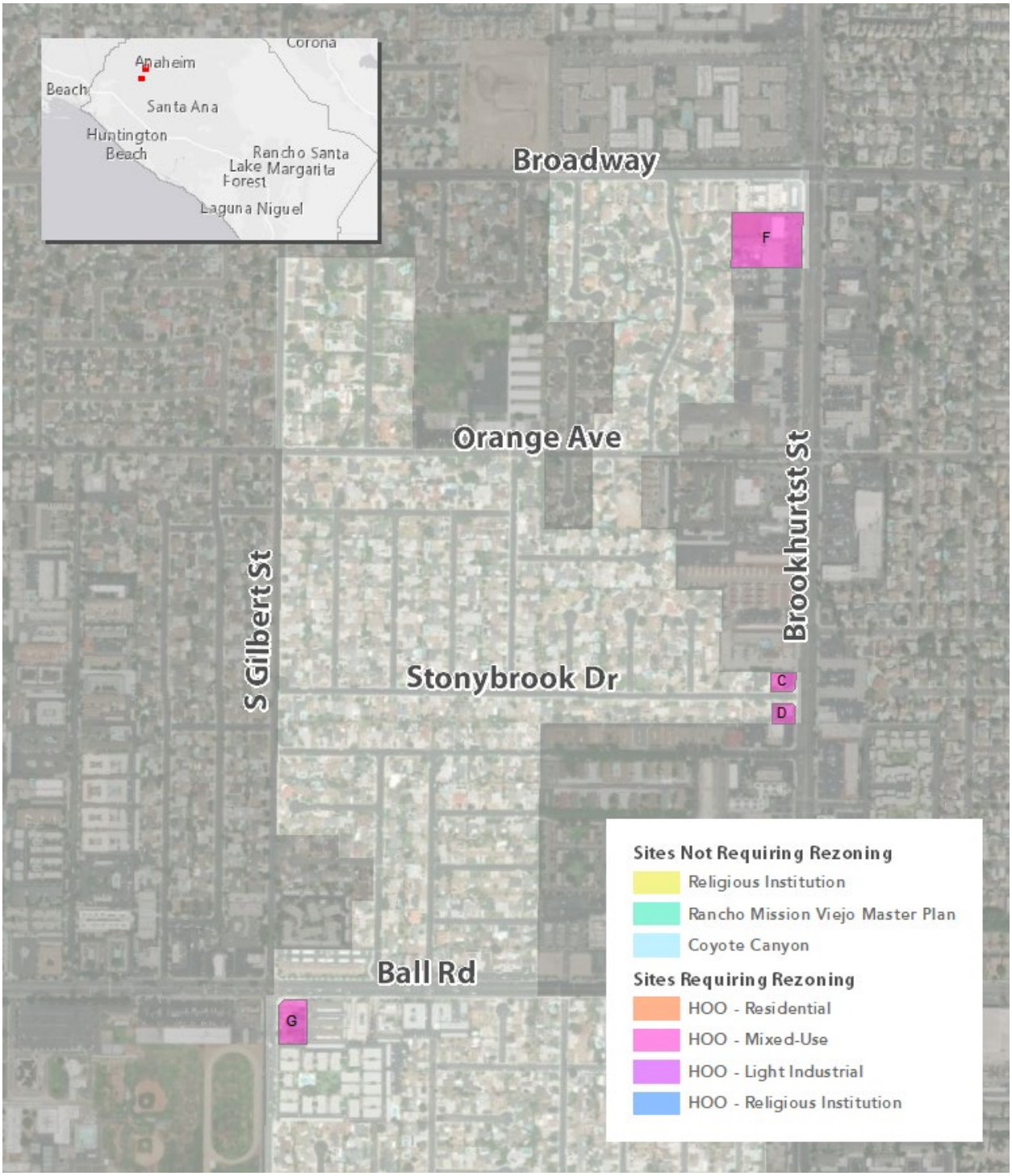


Figure B-4
County of Orange Candidate Sites
Unincorporated Area: Anaheim (Area 2)

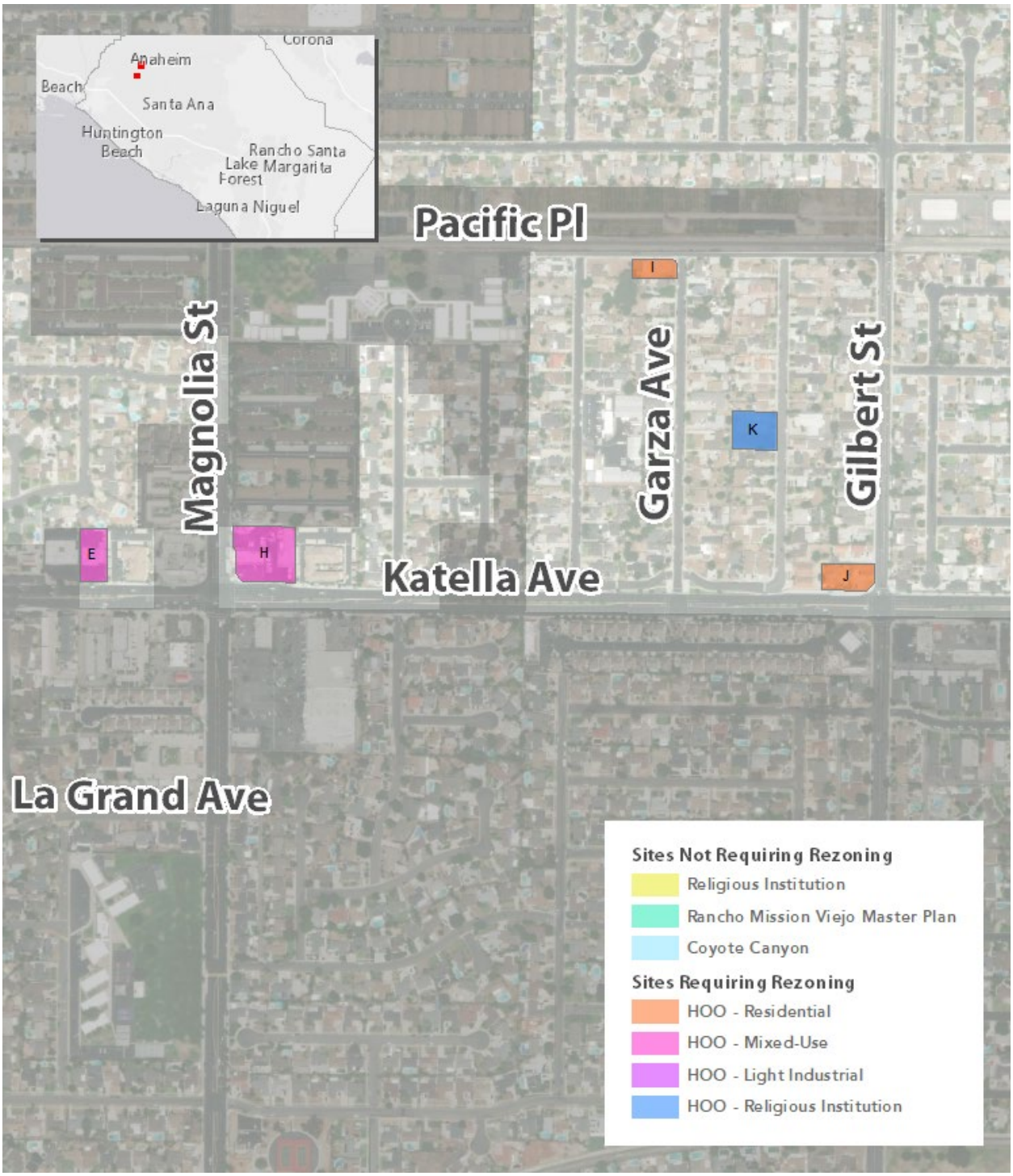


Figure B-5
County of Orange Candidate Sites
Unincorporated Area: El Modena



Figure B-6
County of Orange Candidate Sites
Unincorporated Area: Midway City (Area 1)

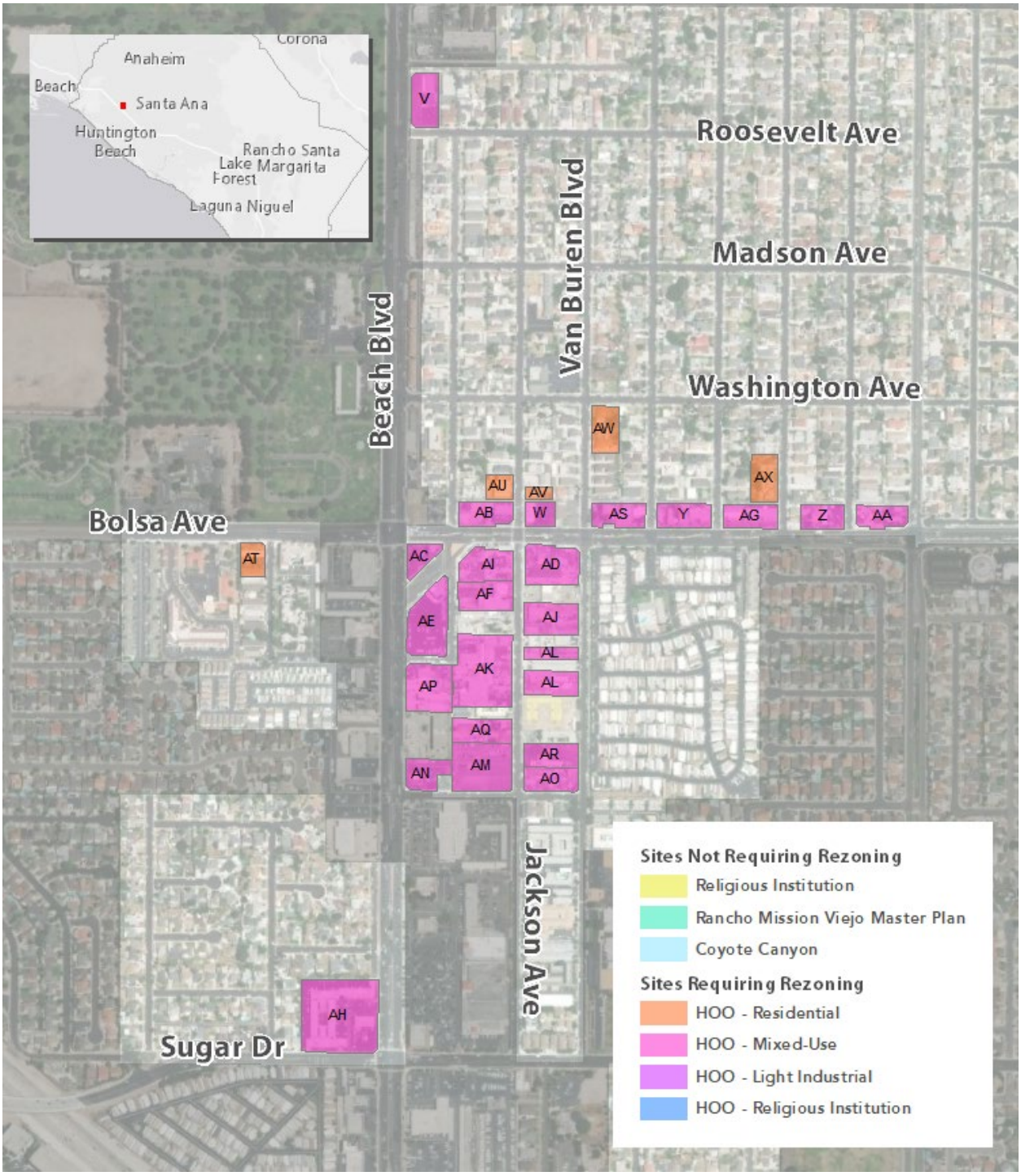


Figure B-7
County of Orange Candidate Sites
Unincorporated Area: Midway (Area 2)



Figure B-8
County of Orange Candidate Sites
Unincorporated Area: Rossmoor



Figure B-9
County of Orange Candidate Sites
Unincorporated Area: Yorba Linda Fairmont



Figure B-10
County of Orange Candidate Sites
Unincorporated Area: Canyons

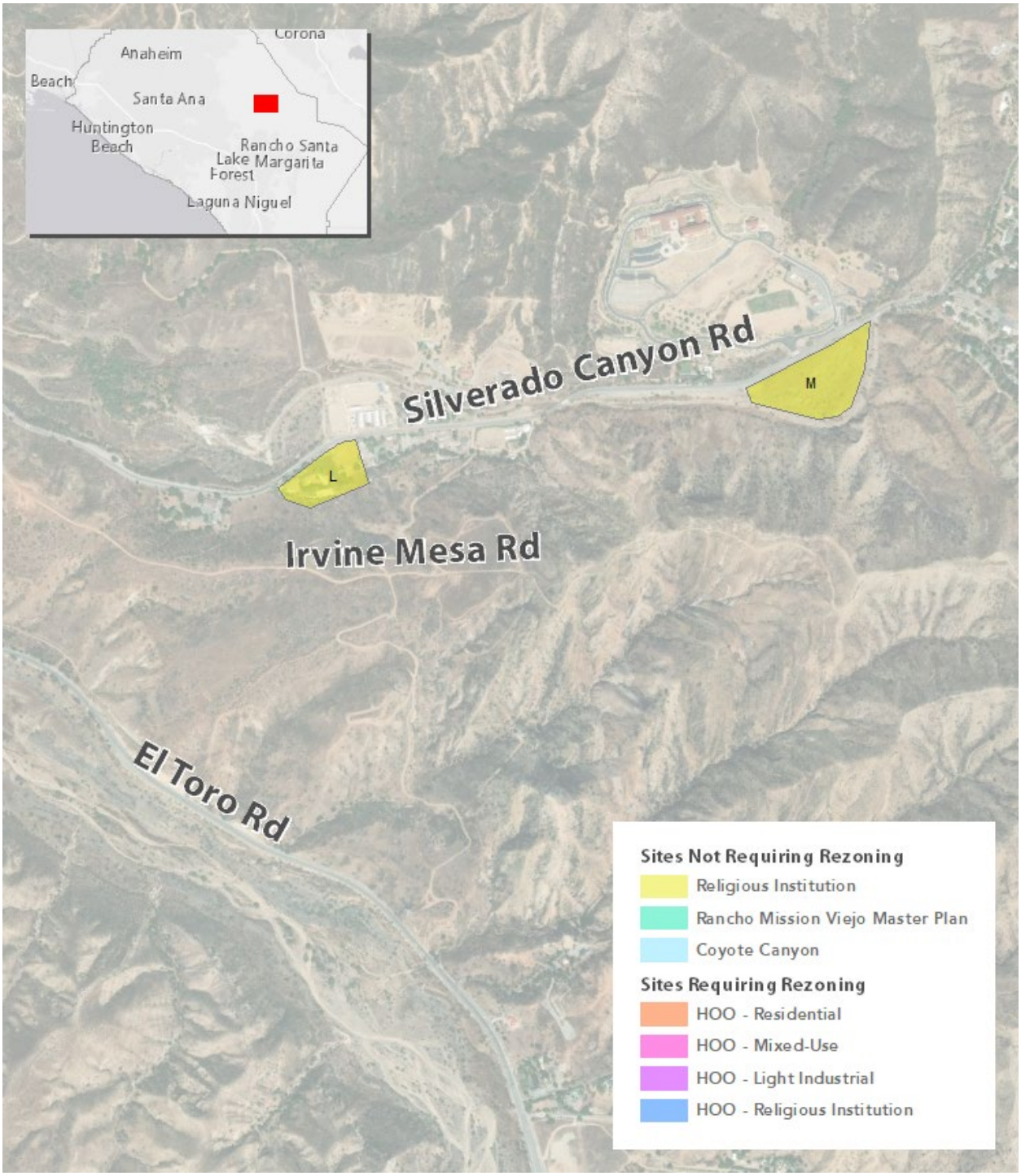


Figure B-11
County of Orange Candidate Sites
Unincorporated Area: Coyote Canyon

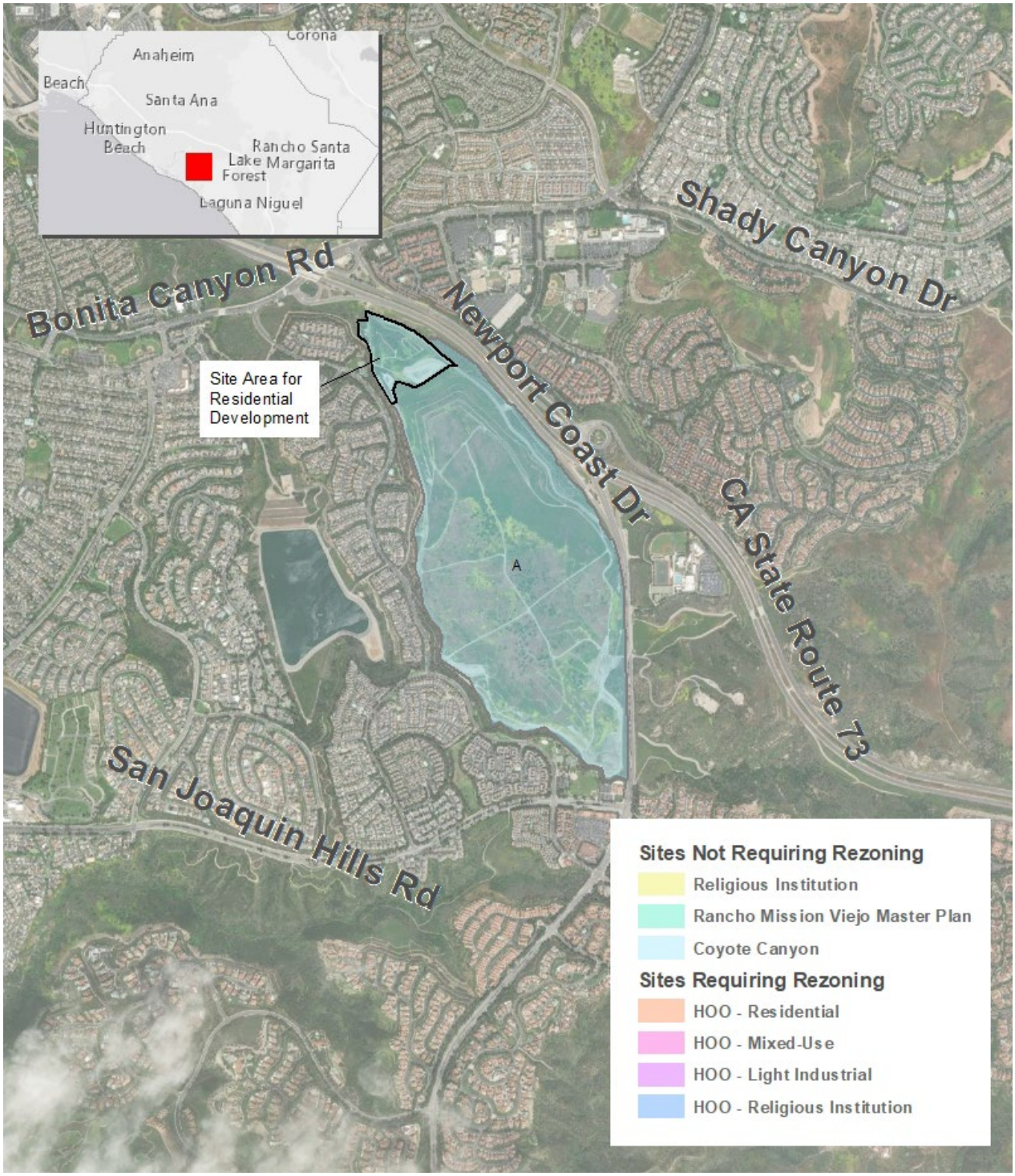


Figure B-12
County of Orange Candidate Sites
Unincorporated Area: Ladera Ranch

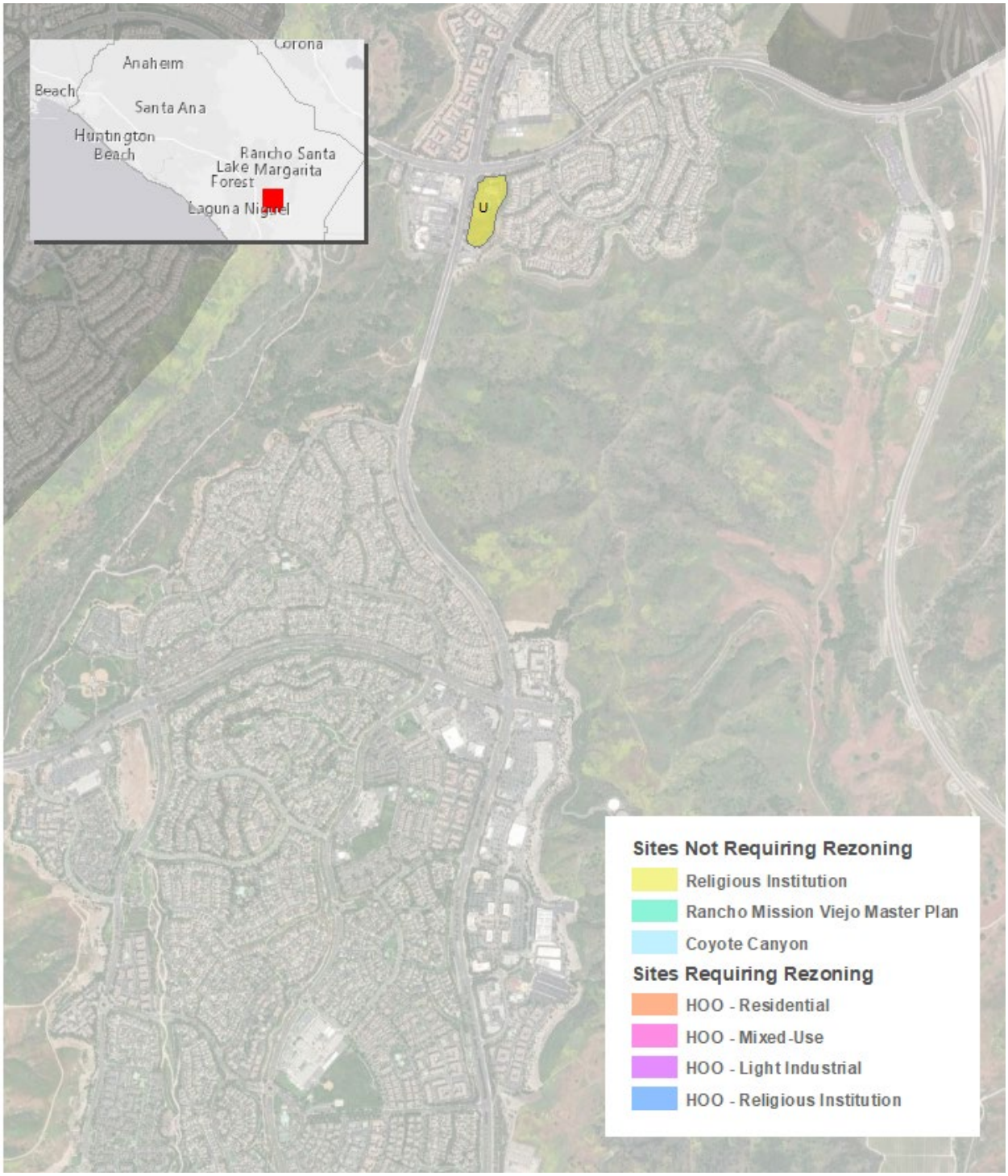


Figure B-13
County of Orange Candidate Sites
Unincorporated Area: North Tustin

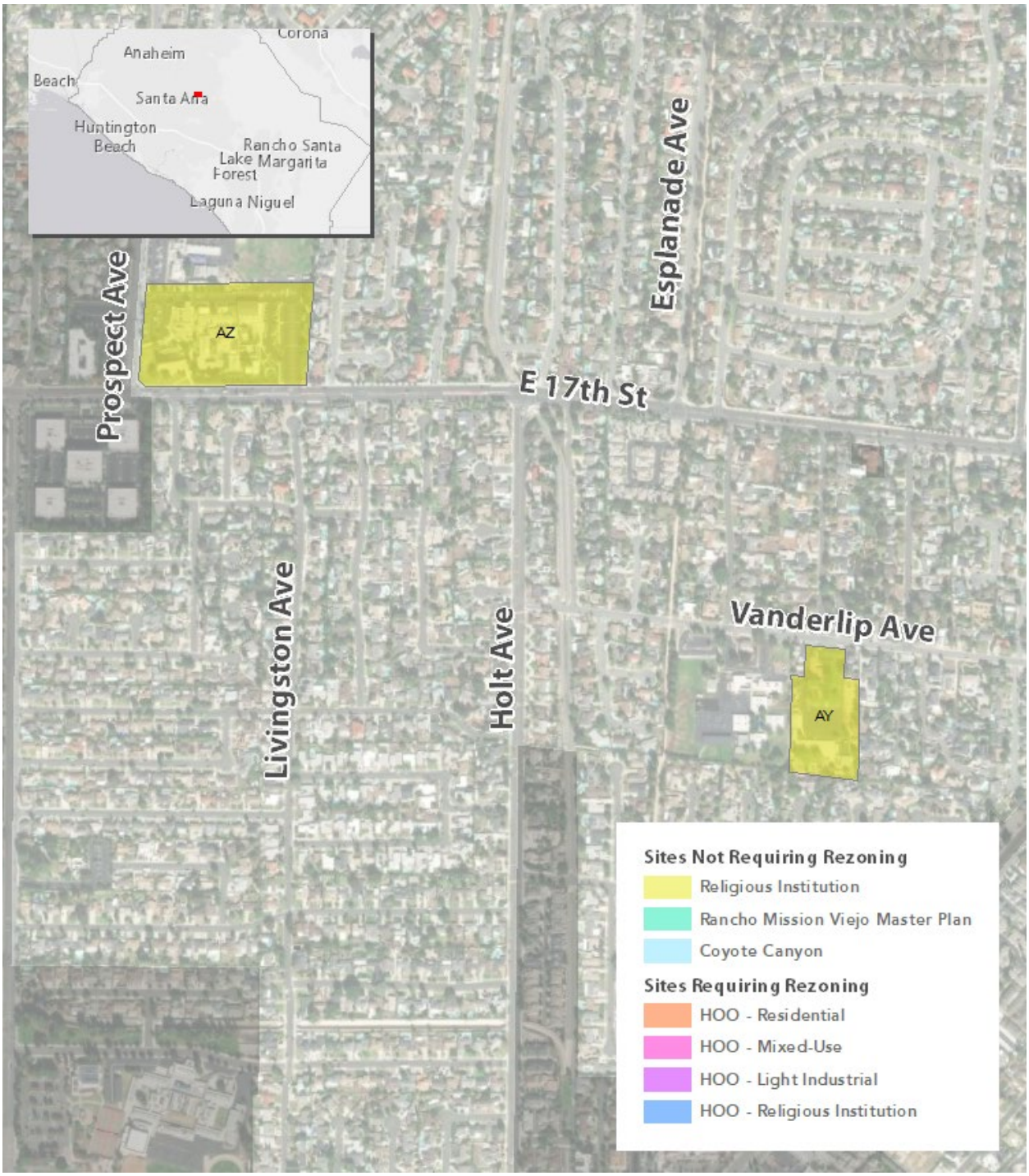
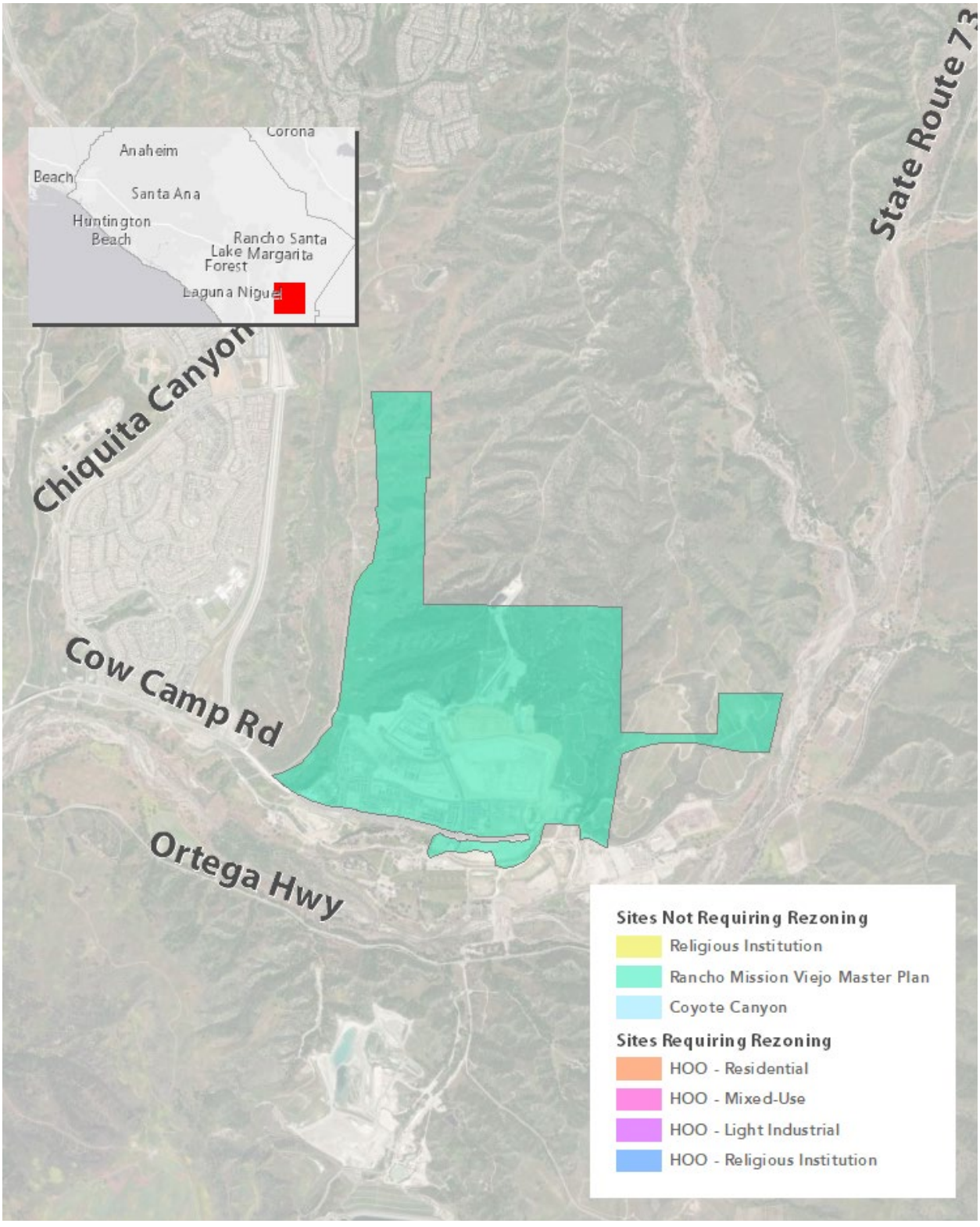


Figure B-14
County of Orange Candidate Sites
Unincorporated Area: Rancho Mission Viejo



Site Inventory Methodology

The County has identified parcels throughout the Unincorporated County areas within the County with a realistic capacity to meet their anticipated housing needs during the planning period (2021-2029). This is based on the demonstrated past development trends on sites within the Housing Opportunity Overlay (HOO). The County has a history of building fully affordable projects above the current maximum density as shown in **Table B-14.**

The majority of the identified candidate sites fall within the HOO which is described in more detail previously in this appendix. The identified sites have been evaluated to determine the extent to which on-site uses are likely to redevelop within the planning period. It was found that a number of the existing uses have the potential to redevelop based on redevelopment capacity, underdevelopment of the site, or other existing characteristics. Many of the uses are in multi-tenant commercial centers with one ownership and most show little to no evidence of recent investment or redevelopment.

Program 2 is the zoning action the County took to increase the maximum allowable density permitted within the HOO to 70 dwelling units per acre. The intent of this is to provide more flexibility for the development community to develop a range of affordable products at higher densities. This is a new development density within the Unincorporated County areas, but many cities within Orange County permit this density and build affordable housing. The following examples within Orange County are either primarily or fully affordable housing projects at or near the 70 dwelling units per acre capacity:

- Casa Paloma, Unincorporated Orange County (95 dwelling units/acre)
- Granite Court, Irvine (57.7 dwelling units/acre)
- Belage Manor, Anaheim (57.3 dwelling units/acre)
- Triada at the Station, Santa Ana (55.2 dwelling units/acre)
- Miracle Terrace, Anaheim (41.6 dwelling units/acre)

These projects represent developments that are at or near 100% affordability at the densities considered by the County of Orange and were used in coordination with local developers to determine an appropriate development density for the HOO.

Site Selection and Suitability

The County's RHNA for the 6th cycle Housing Element is accommodated primarily on non-vacant sites. Existing uses on the sites are older, are physically underdeveloped (relative to the potential capacity), or show signs of disinvestment or deferred maintenance, indicating a "ripeness" for private redevelopment. Key sites with existing uses that are "ripe" for redevelopment typically contain older structures and are underutilized given the development potential afforded. Some sites with existing lower-density residential uses provide the

opportunity for significant capacity increases.

The County anticipates increased residential developments in the HOO areas as there is a general lack of developable residential land in the Unincorporated County and a corresponding, critical need for more housing. There has been a marked increase in inquiries and expressed interest by property owners to redevelop non-residential sites into residential uses, a trend seen in the surrounding region.

Underutilized sites included in this inventory have been chosen based on observable and established redevelopment trends of properties and the potential capacity increase available to property owners. State law requires the County to consider lease terms in evaluating the use of non-vacant sites, however the County does not have access to private lease agreements or other contractual agreements amongst parties because they are private documents. Therefore, the County 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 the Unincorporated County.

State law includes specific criteria for assessment of the realistic availability of non-vacant sites during the planning period. If non-vacant sites accommodate half or more of the lower-income need, the Housing Element must present "substantial evidence" that the existing use does not constitute an impediment to additional residential use on the site. Due to the built-out nature of the Unincorporated County of Orange, most sites have existing uses.

The site suitability criteria below were used to identify underutilized parcels and are listed in Table B-8 under the Site Suitability Criteria column. These criteria help gauge development readiness by identifying properties that align well with current market trends and logistical feasibility. Access to transit increases a site's attractiveness by enhancing connectivity and supporting sustainable growth. Lastly, government ownership or pending development projects often suggest a readiness for change, with fewer barriers and potentially faster project timelines.

Site Suitability Criteria:

1. **Size**: is crucial, as parcels that are neither too small nor too large are often more adaptable to typical development projects in the area. Development trends for affordable projects in the Unincorporated County show an average size of 1 acre. Excluding the County-owned Coyote Canyon site and the Rancho Mission Viejo Master Plan area, the average site size is 1.7 acres. Sites ranging from 0.5 to 5 acres are considered ideal and are highlighted according to this criterion. The size criterion is applied only to County projects, as detailed development information from other cities is limited to what is available publicly.

2. **Existing uses** like those being redeveloped nearby (see Tables B-9 and B-10) indicate compatibility with ongoing transformations, which can streamline the planning process. The existing uses represented in the development trend examples and site inventory primarily consist of older commercial properties, auto-related uses, and religious institutions.
3. **Existing use** is a parking lot, outdoor storage, or other uses that have low or limited lot coverage (includes vacant land). Low or limited lot coverage, including vacant land, signals underutilization, making these sites ideal for new development. A site can have existing uses that fall within both criteria 2 and 3 in the cases of uses that are typical for redevelopment projects and also are highly underutilized.
4. High Quality Transit Area (**HQTA**): Access to transit increases a site's attractiveness by enhancing connectivity and supporting sustainable growth. In California, projects within HQTAs may qualify for several development incentives designed to promote sustainable, transit-oriented growth
5. **County ownership** or there is **pending development** on the site.

The following criteria were used to screen sites; however, due to limited data on these factors for completed projects, they cannot be directly linked to past developments in the Unincorporated County or surrounding region. Although the County of Orange does not currently track these criteria, they remain important indicators of development readiness because they highlight the potential for redevelopment.

6. **Land/improvement value ratios**: reveals whether the land is underutilized; a high ratio often suggests that the property could be repurposed to maximize value. I/L ratio above 1 meets this criterion. Excluding the County-owned Coyote Canyon site and the Rancho Mission Viejo Master Plan area, the average land-to-improvement value ratio is 12, signaling a high degree of underutilization.
7. **Common or consolidated ownership**: simplifies the decision-making process, reducing delays in negotiations or approvals, and making redevelopment more feasible.
8. **Existing Building Conditions**: indicates the need for upgrades or replacements; older or deteriorating buildings are often prime candidates for redevelopment as they require significant investment to meet current standards. As part of the site inventory refinements, we conducted a visual review of each site and, drawing on our development experience, assessed its readiness for redevelopment. Visual cues included large undeveloped areas or sites along major corridors primarily used for surface parking. Aging or deteriorating buildings, or those showing signs of deferred maintenance, were also identified. identified as cues.

Some of the factors mentioned here, as well as those shown in Table B-8, are further discussed in the following section.

Existing Use

Existing uses on the identified sites to be rezoned do not pose a constraint to development and are expected to transition during the planning period. This is supported by development demand

for the identified sites, expressed interest from developers, and past residential and mixed-use development trends (Table B-9) which has primarily consisted of new multifamily buildings replacing older buildings on infill sites. Most of the uses on the identified sites are similar to those that have been previously recycled in surrounding communities.

Vacant Sites
The Coyote Canyon site and portions of the Rancho Mission Viejo site are both vacant. Of the sites that required rezoning, only two sites are vacant.

Non-vacant sites
Close to 80% of the parcels in the site inventory (exclusive of the church properties) are developed with commercial or commercial type uses (such as auto repair uses) and 20% have residential uses.

- *Commercial uses*: Sites with existing uses are like uses that have been recycled previously in the Unincorporated County and region. **Table B-14** shows that five out of the nine affordable developments since the establishment of the HOO were previously developed with commercial uses. Two key projects are:
  - 9541-9581 W. Ball Rd (Cornerstone) – This fully affordable project is directly adjacent to Ball Road in a primarily commercial district. The previous use was a mixed-use commercial office and retail building.
  - 9051 & 8911 Katella (Stonegate I and Stonegate II) – These fully affordable projects are on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants. These parcels were previously commercial car and RV storage.
- *Commercial/Industrial Uses*: Sites in non-residential areas are predominantly commercial but many are in areas historically developed with industrial uses that have slowly transitioned to commercial uses and more recently to high-density residential uses. The County also has experience permitting development on sites that were previously industrial and manufacturing uses. In the Unincorporated Midway City community, for example, there is a cluster of sites currently developed with auto repair and used car sales in an area with a light industrial feel. Casa Paloma is a fully affordable housing project developed on the site of a previous pottery manufacturing facility. This project, located in Midway City, is surrounded by a mixture of light industrial, commercial, and residential uses. It is a 71-unit affordable housing development with a density of 63.4 du/ac on just

over one acre in size. However, there has been a marked transition to residential uses given the high demand for housing. The Jackson Street housing development is a 65-unit affordable development on about a three-quarter acre site with a density of 87.25 du/ac on a site that was previously developed on a site that was in use as an automobile related business and one single family home.

- *Residential Uses*: 29 parcels in the inventory are currently developed with residential units, a trend supported by the projects in **Table B-14** where six of all the 12 projects were previously developed with similar residential uses. Recognizing that redevelopment of higher -density housing is challenging and unlikely, all identified sites with existing residential uses have less than 5 housing units. Only one parcel has 4 units, one other parcel has two units, and 27 parcels have only one unit. All parcels with a residential use have the potential for significant capacity increases. In fact, the estimated capacity increase on these parcels ranges from 4.5 to 28 times the number of existing units. This is a typical trend for housing developments on properties with existing uses. Potters Lane, a 16-unit affordable development in Midway City was developed on a site previously in use as a single-family home. The project was developed on a site under half an acre in size and achieved a density of 39 du/ac on a site that had a maximum allowed density of 25 du/ac.
- Religious Institution Uses: There are only nine religious institutional sites in the inventory that were chosen based on the availability of excess vacant property or large parking lots, that could accommodate residential development without assuming removal or replacement of church buildings. Throughout California, the development of affordable housing on religious properties has become an increasing trend (due also to the homeless crisis). Nonprofit organizations such as Many Mansions and National CORE have assisted many religious facilities to convert their surplus land and underutilized parking lots into affordable housing. Housing development is also beneficial to the owners. Redevelopment of affordable housing can provide a stream of rental revenue that can replace declining income and lower membership numbers. Religious institution land is ideal for housing development as many in Orange County are in well-established communities that have access to greater economic and educational amenities. Key examples of church housing projects in the County and region are listed below.
    - In 2016, the Brothers of Saint Patrick Novitiate Monastery, located in the Midway City area of the Unincorporated County, rezoned a 3.6-acre portion of a 5.4 acre property to develop a three-story, 88-unit age-restricted (62+) senior housing community known as “The Retreat”. The project has a density of 24.4 du/ac (on a site that allowed a maximum

density of 20 du/ac) and was developed prior to legislation facilitating development on religious institutional properties.

- In Anaheim, two projects on church properties have resulted in the development of 65 new housing units. Wesley Village is an affordable housing development built on the grounds of the Garden Grove United Methodist Church in partnership with, Jamboree Housing Corporation, a non-profit developer. The developer entered a 60-year ground lease with the church, repurposing 2.2 acres of excess parking space and unused vacant land. The 47-unit development, opened in 2017, includes the addition of a family apartment building, senior apartment building and Head Start learning center. The 18-unit Walden development was built on the St. Mark's Lutheran Church property that was being leased to other congregations. Also in Anaheim, in 2023, St. Michael's Episcopal Church and its partner church, St. James' Church in Newport Beach, worked with Habitat for Humanity to build 24 affordable townhomes.
- In Buena Park, the 66-unit, affordable Orchard View Senior Apartments is under development as partnership between National CORE and St. Joseph's Episcopal Church. The project weas developed on underutilized church land.
- In 2024, the Santa Angelina Senior Community was developed by National CORE at the Episcopal Church of the Blessed Sacrament in Placentia. The development provides 65 affordable apartment homes to seniors aged 62 or better who earn less than 60% of the area median income (AMI). Because of the location, residents of Santa Angelina belong to an engaged, service-enriched village linked to the adjacent church and surrounding community.
- In early 2025, Inglewood First United Methodist in Los Angeles is scheduled to begin construction on 60 studio apartments that will replace three empty church buildings.
- A 25-unit housing development At Trinity Lutheran Church in the City of Whittier was approved in 2021. The church sold part of its property that had a defunct school building.
- IKAR, a Jewish congregation in Los Angeles has plans to break ground in 2025 on a new synagogue that will include a worship space, a preschool and 60 units of affordable housing in the Mid-City neighborhood, where the typical home is valued at $1.8 million.

- The Diocese of Los Angeles, which spans from Santa Barbara County to the San Diego County line has committed to building affordable residential units on 25% of the diocese's 133 church campuses serving low-income families, seniors, refugees, and homeless people. The diocese's churches are working with development partners to build and maintain apartment complexes on land held in trust by the diocese that's being leased to its various partners. The diocese is working with partners in Placentia, Buena Park, Anaheim, Claremont, Downey, Garden Grove, Gardena, Rialto, Riverside and others.
- In 2019, Clairemont Lutheran Church members in San Diego an affordable housing project on part of their parking lot. Clairemont Lutheran Church ultimately envisions a roughly 16-unit affordable rental for San Diego residents transitioning out of supportive housing.

Regional Trends

Regional trends in **Table B-10** look at three north Orange County cities as they are physically close to the identified sites and are areas with similar existing uses, development patterns, and housing markets. Residential development trends in surrounding cities indicate a higher demand for residential uses in areas with limited land availability, often leading to the redevelopment of commercial properties. This shift is evident as commercial areas and properties originally developed for commercial uses are increasingly being converted to meet residential needs. Previous uses for the developments shown in **Table B-10** are like the existing uses on the HOO rezoning sites in the inventory.

Table B-9
Recent Redevelopment Trends in Unincorporated Orange County

Affordability	Residential Developments	Units	Zoning	Size	Prior Use	Site Suitability Criteria
Affordable	Cornerstone 9541-9581 W Ball Rd 127-284-01	49	CN Commercial Neighborhood	1.45	Commercial (Office/Retail Building)	1, 2
Affordable	Avenida Villas 9602-9612 W Ball Rd	29	R3	0.82	Medical Office Building	1, 2
Affordable	Buena Vista 16451 E Buena Vista St	17	C2	0.51	Vacant	1, 3
Affordable	Stonegate I 9051 Katella	38	C1	1.15	Commercial/Car and RV storage	1, 2, 4, 5
Affordable	Stonegate II 8911 Katella	26	C1	0.76	Commercial/ RV rentals	1, 2, 4
Affordable	Cerritos Family, 9501 W Cerritos	60	R2 Multifamily Dwellings	2.05	Church	1, 2
Affordable	Potter's Lane, 15171 Jackson	16	C2	0.41	Single-Family Residential Unit	1, 2, 4
Affordable	Casa Paloma 15162 Jackson,	71	C2	1.12	Pottery Manufacturing Facility	1, 4

Table B-9
Recent Redevelopment Trends in Unincorporated Orange County

Affordability	Residential Developments	Units	Zoning	Size	Prior Use	Site Suitability Criteria
Affordable	Jackson Street 15081 Jackson Ave, 15072 Adams, 15082 Adams	65	C2	0.75	Single family and commercial (automotive) use	1, 2
Market-Rate	14892 Van Buren St Midway City	3	R3	0.18	Vacant	1, 3, 4
Market-Rate	14621 Adams St, Midway City	4	R3	0.22	Single family unit	1, 3, 4
Market-Rate	14881 Newland St Midway City	4	R3	0.18	Duplex	1, 2, 4
Market-Rate	14682 Adams St Midway City	4	R3	0.4	Single family unit	1, 3, 4
Market-Rate	14672 Adams St Midway City	4	R3	0.4	Single family unit	1, 3, 4

Table B-10
Recent Redevelopment Trends in the Region

City	Project	Units	Description	Previous Use	Status	Year	Site Suitability Criteria
Garden Grove	Brookhurst Triangle	800	800 units on 13.9 acres and 200,000 sf of commercial uses (mixed-use) _	Commercial buildings/uses and used auto dealerships	Completed	N/A	2, 4
Garden Grove	Century Triangle	53	53 townhomes	Commercial buildings/uses and used auto dealerships	Completed	N/A	2, 4
Garden Grove	Lotus Walk	159	159 condominiums on 3.8 acres	Office buildings	Completed	2010	1, 2
Garden Grove	Wesley Village	47	47 affordable units on 2.5 acres	Garden Grove United Methodist Church and pre-school and the Head Start program	Completed	N/A	1, 4
Garden Grove	Garden Brook Senior Village	394	394 affordable units on 5.1 acres (mixed-use)	Vacant buildings from a prior car dealership	Completed	N/A	1, 3, 5
Garden Grove	Site Plan No. SP-138-2024 & Tentative Tract Map No. TT-19314	35	35 condominiums on 1.4 acres	SF Residence	Under Development	2024	1, 2, 6
Garden Grove	Grove Senior Apartments 12811 Garden Grove Blvd	85	85 senior apartment units on < 2 acres	Restaurant and automotive buildings/use	Completed	N/A	1, 2
Garden Grove	Harbor Grove Senior Apartments	93	93 senior apartment units on 1. 3 acres	Commercial buildings	Completed	N/A	1, 2
Garden Grove	Sungrove Senior Apartment Homes 12811 Garden Grove Blvd – 12142 Tamerlane Dr.	93	93 senior apartment units < 2 acres	Commercial buildings (flower shop, dairy shop, coin-operated car wash)	Completed	N/A	1, 2
Garden Grove	Bria Townhomes	31	31 townhomes	Intermediate care facility for developmentally disabled	Completed	2020	1, 2
Garden Grove	9691 Bixby Avenue	27	27 units (2 affordable) with some tandem parking on 0.83 acres	Daycare facility	Undergoing Review	2023	1, 2

Table B-10
Recent Redevelopment Trends in the Region

City	Project	Units	Description	Previous Use	Status	Year	Site Suitability Criteria
Garden Grove	13252 Brookhurst Street	24	24 townhomes or 35 townhomes on 1.22 acres	Restaurant building and/or rental car lot	Undergoing Review	2023	1, 2
Garden Grove	8322 Garden Grove Blvd	19	19 attached units (2 affordable) on 0.74 acres	Commercial buildings	Undergoing Review	2023	1, 2
Garden Grove	13002 Nina Pl	15	15-unit apartment building (2 affordable) on 0.4 acres	Commercial buildings and single-family residence	Undergoing Review	2023	1, 2
Garden Grove	9891 Garden Grove Blvd	59	59-unit apartment building on 0.8 acres	Auto repair building/use	Undergoing Review	2023	1, 2
Garden Grove	9961 Garden Grove Blvd	55	55-unit affordable apartment building on 0.4 acres	Used auto dealership buildings/use	Undergoing Review	2023	1, 2
Garden Grove	8642 Garden Grove Boulevard	23	23-unit mixed-use project on 0.3 acres	Commercial and office buildings	Undergoing Review	2023	1, 2
Garden Grove	10231 Garden Grove Blvd	52	52-unit mixed-use project (on 1.9 acres)	Commercial building (furniture store) and used auto dealership	Undergoing Review	2023	1, 2
Garden Grove	Pearl Street Work-Live 10662 Pearl St	#	10-unit work-live mixed-use project on 0.7 acres	Commercial buildings (bicycle shop) and a single-family home	Undergoing Review	2023	1, 2
Garden Grove	8734 Garden Grove Blvd	20	19 attached units (affordable) on 0.9 acres	Used car auto dealership	Undergoing Review	2023	1, 2
Westminster	Della Rosa 14800 Beach Blvd	50	a 50-unit affordable housing development on 0.8 acres	Older commercial strip mall	Completed	2020	1, 2
Westminster	Westminster Crossing	65	65-unit affordable housing project on 1.97 acres	Underutilized commercial building	Completed	2019	1, 2
Buena Park	Clark Commons 8004 Orangethorpe Avenue	70	70 affordable deed restricted multifamily units on 1.94 acres	Strip Retail Center	Completed	2017	1, 2
Buena Park	Orchard View Senior Apartments 8300 Valley View Street	66	66-unit affordable age restricted multifamily residential (proposed/under review) on 1.76 acres	Religious facility, parking lot	Under Construction	2024	1, 2
Buena Park	Indigo Walk 8281 Page Street	54	54-unit multifamily residential on 2.33 acres	Religious facility, parking lot	Under construction	2019 or 2020	1, 2
Anaheim	1619-1699 W Lincoln Ave	115	115 townhomes on 7 acres	Manufacturing business and 2 auto dealerships	Completed	2023	2

Table B-10
Recent Redevelopment Trends in the Region

City	Project	Units	Description	Previous Use	Status	Year	Site Suitability Criteria
Anaheim	Downtown Anaheim 39 702-798 N Ethan Way	39	39-unit multifamily complex on 1.6 acres	RV storage	Completed	2022	1, 2
Anaheim	312-400 S Euclid	39	39-unit townhome complex on 2.3 acres	small office, small strip mall, restaurant	Completed	2022	1, 2
Source: Cities of Anaheim, Garden Grove, Beuna Park, and Westminster 2021-2029 Housing Elements							

Lot Consolidation

Due to the historical parcelization pattern in many areas of the Unincorporated County, the inclusion of small sites in the inventory is expected. To adhere to State law and HCD guidance, there are no stand-alone small sites used to meet the lower-income RHNA. The County includes lot consolidation as part of the development review process. Lot consolidation is done as part of the mapping process and approved with initial entitlements. This does not place additional requirements outside of the County's typical development process on an applicant and is approved concurrently. **Table B-14** shows that four large affordable projects included lot consolidation. These projects have a combined capacity of 149 units. These 4 projects have an average size of less than one acre. This size and lot consolidation pattern matches the site inventory. While multi-parcel sites under common ownership are ideal, it is unrealistic. Nonetheless, more than half (55%) of the multi-parcel sites are either fully under common ownership (one owner) or have several parcels under common ownership, which can make sales and/or lot consolidation easier.

- Avenida Villas (2011): this 29-unit affordable project was developed on a site that was less than 1 acre in size. The project included consolidation of two small (<0.5 acres) parcels and resulted in a density of 35.4 units per acre.

- Buena Vista (2011): this 17-unit affordable project was developed on a half-acre site. The project included consolidation of two small (<0.5 acres) parcels and resulted in a density of 33.3 units per acre.

- Stonegate (2009): this 38-unit affordable project was developed on a 1.15-acre site. The project included consolidation of two parcels (one was under half an acre in size) and resulted in a density of 33 units per acre.

- Jackson Street (2022): this 65-unit affordable project was developed on a 0.75-acre site. The project included consolidation of three small (<0.5 acres) parcels and resulted in a density of 87.3 units per acre.

Table B-14 demonstrates that lot consolidation, the assembly of small parcels, and the development of small sites do not constrain housing development. Of the 371 affordable units (across nine projects) developed within the HOO, 40% (149 units) involved lot consolidation, including a recent project yielding 65 affordable units on a site under one acre. Projects outside the HOO show lower levels of lot consolidation, as these tend to be smaller—averaging 0.3 acres, as shown in Table B-15. Table B-14 identifies the projects that included consolidation of small parcels (<0.5 acres).In the Housing Opportunities Overlay, lot consolidation is incentivized by higher allowable densities. The County's Zoning Code grants graduated density increases to projects that consolidate based on project size after lot consolidation (section 7-9-44.7 of the

Zoning Code). The County's Code reads "A graduated density incentive shall be granted when parcels smaller than one-half (0.5) acre are consolidated as part of a project. The increased density shall be in addition to any other density bonus available under this Zoning Code, to a maximum of 45% total, and shall be calculated as follows." (Shown in **Table B-11** below.) The graduated density incentives in the zoning code are aimed at facilitating and encouraging lot consolidation to ensure that these smaller sites can appropriately provide additional residential units. For example, projects on sites under 0.5 acres can reach densities of up to 70 units per acre, while larger consolidated sites can achieve densities of 77 to 84 units per acre, depending on the final project size. This incentive has spurred consolidation of very small parcels, as seen with the Buena Vista project, which combined two parcels to create a half-acre site. The combination of strong residential demand, development incentives, and a proven track record of successful lot consolidations demonstrates that this approach is both realistic and achievable. In contrast, recent market-rate projects outside the HOO, as shown in Table B-9, tend to be smaller and typically do not involve lot consolidation—further evidence that development and lot consolidation are effectively incentivized within the HOO.

To reinforce its commitment to housing development, the County has committed under Program 3 of the Housing Plan to create informational resources on its website detailing lot consolidation incentives and the density bonus program. Additionally, it will produce and distribute lot consolidation incentive materials in early 2025.

Table B-11
Graduated Density Increase within HOO

Project Size (after lot consolidation)	Base Density (per net development area)*
Less than 0.50 acre	70 units/acre
0.50 to 0.99 acre	77 units/acre (10% increase)
1.00 acre or more	84 units/acre (20% increase)
**Note: Base densities will be updated based on the increased density permitted within the HOO per Housing Element Program 2*	

Site Conditions

Site conditions were an additional criterion for site selection. Underutilized sites consist of existing uses that are older or show signs of disinvestment or deferred maintenance, indicating a "ripeness" for private redevelopment. Many parcels in the inventory are currently developed with commercial uses and have a high potential for conversion to residential or mixed-use based on existing site characteristics such as deteriorated or vacant structures, low building value compared to land value, or marginal economic uses (e.g., used car sales).

Comparing assessed improvement value with assessed land value provides insights into the composition of a property's value, revealing the relative contributions of buildings and land. It indicates investment levels, development status, and potential for future improvements. For planners and policymakers, it informs zoning decisions and highlights areas for potential

redevelopment or infrastructure enhancement. In this site inventory an improvement/land comparison shows that most sites have land values that are higher than improvement values which signifies ripeness for development. The average improvement to land value ratio for non-church HOO sites is 0.6 which suggests that the existing buildings or improvements on the identified HOO sites (exclusive of religious institutions) may be underutilized or outdated or that the current use is not maximizing the land's potential. Such properties are often prime candidates for redevelopment, as investors and developers see opportunities to replace or significantly upgrade the current structures to better align with the land's high value and potential for higher returns. Of the parcels where improvements and land value data were available, only 11 parcels (out of the 146) had a ratio over 1.54 and in almost all cases those parcels were not stand alone uses but in site grouping where the majority of the site had a ratio under 1.54.

Identifying potential sites must balance available information on the site with a visual and contextual assessment. While data pointing at older structures or high improvement value can give a good sense of the redevelopment potential, for many sites visual cues are important. There are a few sites where the data indicates a higher improvement value or a newer structure, but a visual assessment shows that a structure shows signs of disrepair or is underdeveloped in comparison with development nearby. The site with the largest ratio value was visually assessed as a single-family home on a larger lot in extreme disrepair. The site shows clear signs of neglect and lack of maintenance, with visible exterior deterioration such as peeling paint and damaged fixtures. The unused pool and presence of trash in the yard further indicate a state of disuse and disregard for upkeep. Its location in a neighborhood that is transitioning to multifamily uses, along with an allowed density that would allow a 12-fold increase in units, made it an ideal candidate for redevelopment.

Location

In addition to an on-the-ground existing use analysis, the County of Orange has market conditions to facilitate the redevelopment of non-vacant sites for residential. 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.[26] Additionally, according to the CAR Current Sales and Price Statistical Survey, the median cost of a home for sale in Orange County increased by 20% from

[26] Median time on Market of Existing Detached Homes, Historical Data, California Association of Realtors (CAR), Accessed online: December 9, 2021. https://www.car.org/marketdata/data

2020-2021 (from $930,000 in October 2020 to $1,120,000 in October 2021).[27] The indicators above signify an increased market demand for new housing.

All sites requiring rezoning are urban, infill sites and do not have any environmental or infrastructure constraints. 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, dry utilities services, and other infrastructure to service the candidate sites. No sites have easements that would reduce development potential (e.g., roadway or major utility easements).

Housing Opportunity Overlay

It is important to recognize that this inventory of potential development sites is much smaller than the entire Housing Opportunities Overlay Zone because it only includes high potential sites based on the site suitability criteria listed above and in the following description of specific communities. Based on the allowable density of 70 to 84 units per acre excluding any density bonus, the total capacity of the Housing Opportunities Overlay Zone is more than 5,000 additional lower-income units. This is a conservative estimate since any residential project within the Housing Opportunities Overlay Zone will also qualify for a density bonus. **Table B-14** lists residential development projects that have been constructed on parcels within the HOO. The County has been successful in redeveloping non-vacant sites zoned for other than residential uses for development of housing.

The County has received letters of support from local affordable housing developers indicating their experience in developing in the HOO. These letters are shown in Appendix C (**Figures C-1 to C-2)** and are from developers who have previously built over 100 affordable units within the HOO. They demonstrate support for the HOO as well as prove, along with the projects, below, the effectiveness of the HOO in affordable housing being developed within the County of Orange.

High Quality Transit Areas

The Southern California Association of Governments (SCAG) developed a mapping tool for High Quality Transit Areas (HQTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. A Significant portion of the Unincorporated County, particularly in the north, is within a HQTA and provides Significant incentives for development of affordable housing:

[27] Current Sales and Price Statistics, California Association of Realtors (CAR), Accessed online: December 9, 2021. https://www.car.org/marketdata/data

- Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop.
- Assembly Bill 2097 (AB 2097) prohibits cities and counties from enforcing minimum parking requirements for residential, commercial, and other types of developments located within half a mile of public transit. Developers can decide how much parking to provide based on market demand rather than being bound by local government mandates. This flexibility can lead to more innovative and cost-effective project designs.

Of sites that required rezoning, more than half (51%) of the lower-income site capacity is located on sites within a HQTA. Close to half (48%) of all site capacity is on sites within a HQTA. Recent projects in the Unincorporated County have benefited from HQTA incentives.

The eight affordable housing projects built since 2006 are located on or adjacent to transportation corridors. For example. Stonegate I and Stonegate II are fully affordable projects located on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants. Casa Paloma, a 71-unit multifamily affordable housing apartment community, was developed in accordance with the Housing Opportunities Overlay Zone Regulations and qualified for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project's proximity to a major transit stop also permits use of modified parking standards.

Incentives for Redevelopment:

The County's successful track record of facilitating the development of affordable projects since the adoption of the Housing Opportunities Overlay Zone in 2006, combined with the ongoing efforts of Planning and Housing staff, will create the regulatory framework to encourage housing development to the extent as economic conditions improve allow.

As discussed previously, the County's Zoning Code currently incentivizes lot consolidation within the Housing Opportunities Overlay by granting graduated density increases to projects that consolidate based on project size after lot consolidation (section 7-9-44.7 of the zoning code). Sites that are one or more acres in size have a maximum density of 84 du/ac compared to the base density of 70 du/ac for sites less than half an acre in size.

Due to the County's extensive experience with affordable housing development, they are skilled at collaborating with developers to maximize land use and leverage regulatory incentives to facilitate affordable housing development, as shown in **Table B-12.**

Table B-12
Incentives Granted to Affordable Housing Developments within the HOO

Project Address/ APN	Dwelling Units	Size	Incentives Granted
Cornerstone 9541-9581 W Ball Rd 127-284-01	49	1.45 acres	• Over-height walls and lighting standards • Decreased front setback
Avenida Villas 9602-9612 W Ball Rd 127-341-52	29	0.82 acre	• Over-height walls and lighting standards • Decreased front setback • Use of commercial parking standards
Buena Vista 16451 E Buena Vista St 360-383-02, 360-383-03	17	0.51 acre	• Over-height walls • Decrease in minimum drive aisle width
Stonegate I 9051 Katella 127-621-06, 127-621-07	38	1.15 acre	• Reduced length of parking spaces • Additional ten feet in height of building • Over-height walls and lighting standards
Stonegate II 8911 Katella 126-503-29	26	0.76 acre	• Reduced length of parking spaces • Additional ten feet in height of building • Over-height walls and lighting standards
Cerritos Family 9501 W Cerritos 127-401-39	60	2.047 acres	• Reduced depth of parking stalls and drive aisle • Reduced front setback • Over-height walls and lighting standards
Potter's Lane 15171 Jackson 107-151-16	16	0.41 acre	• Reduced length of parking stalls
Casa Paloma 15162 Jackson, 15182 Jackson 107-180-11, 107-180-23	71	1.12 acre	• Increase of maximum building height • Unlimited density bonus

Realistic Capacity Approach

Consistent with HCD guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. Due to the limited availability of residential land, many property owners and developers may opt for a density bonus to increase the unit count. Starting in 2021, residential projects in California with on-site affordable housing can get a density bonus of up to 50 percent. Previously, under Government Code Section 65915—commonly known as the Density Bonus Law—the maximum bonus was 35 percent. In addition, provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop.

Housing Opportunities Overlay (HOO)

The 6th Cycle RHNA sites inventory includes 59 sites within the HOO. The HOO is a zoning overlay district that provides for the development of 100% affordable rental housing by-right (without a use permit) within commercial, mixed-use, and industrial districts, and on building sites zoned for high density residential uses. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning. Most sites within the site inventory have

a residential (R-2, R-3, and R-4) or mixed-use (MX) underlying zone. Maximum allowable density (ranging from 77 to 84 du/ac) for the HOO is used to calculate realistic capacity of the sites based on the County's strong record in development of affordable housing in the HOO, new zoning regulations that prioritize housing development in non-residential areas, and incentives to achieve higher densities through lot consolidation.

All HOO sites have underlying zoning that has been amended to require a minimum residential density of 30 du/ac and a maximum of 43.5 du/ac. The HOO densities range from 70 du/ac to 84 du/ac depending on site size. This graduated density approach incentivizes affordable residential development for larger projects or projects that consolidate multiple properties. For multi-parcel sites in the inventory, the HOO density applied in the inventory is not based on overall combined site size but rather on the individual parcel size. For example, a site can have three parcels in a range of sizes with three different maximum densities. This is a more conservative approach for calculating capacity and in most cases means that the actual true capacity potential (for the overall site) is not used.

Table B-13
HOO Site Densities

Site Zoning	Allowed Density Range	Realistic Capacity Assumed Density
HOO-R-2	30 – 84 du/ac (depending on size)	• Less than 0.50 acre: 70 units per acre • 0.50 to 0.99 acre: 77 units per acre (10% increase) • 1 acre or more: 84 units per acre (20% increase)
HOO-R-3	30 – 84 du/ac (depending on size)	
HOO-R-4	30 – 84 du/ac (depending on size)	
HOO-MX	30 – 84 du/ac (depending on size)	
HOO-M-1	30 – 84 du/ac (depending on size)	

The site inventory assumes that potential development will occur under the HOO, rather than the base zone, due to the generous development standards and strong development track record. As mentioned above, maximum allowable densities (ranging from 77 to 84 du/ac) for the HOO are used to calculate realistic capacity of the sites. The HOO was adopted in 2006, and the maximum density has been increased twice since then and actual development densities have increased proportionally. **Table B-14** shows that all but two projects have achieved densities in excess of what is allowed in the HOO. In comparison, recent residential development in residential (R-3) areas outside the HOO during the same period have been developed at lower densities (**Table B-15**).

California's Density Bonus Law allows developers to increase the density of a property beyond the maximum allowed by a jurisdiction's General Plan. Projects where 100% of units have below market rate rents and located near transit (High Quality Transit Areas or HQTA) may be eligible for unlimited density and reduced or no parking standards. Close to 65% of all HOO sites are located within a HQTA and the potential for unlimited density shows that projects have the

potential for greatly exceeding the maximum density in the HOO. Projects outside of a HQTA overall show slightly lower densities (as a proportion of allowed maximum density) yet still average densities in excess of the maximum allowed densities on the properties. As such, assuming maximum density on identified HOO sites is a reasonable and realistic approach.

State law also requires that for non-residential zoned sites, the capacity methodology accounts for the likelihood of residential development on these sites. Stand-alone, non-residential projects are not allowed in the HOO on the underlying zones for the identified sites. The HOO regulations require that all projects, including mixed-use projects, include housing. And based on development trends in the HOO where no mixed-use projects have been built, the development of housing is a certainty. Suitability of non-vacant sites is discussed earlier in this methodology section.

Table B-14
HOO Projects List

Project Address/ APN	Units	Size	Density (du/ac)	Zoning	Prior Use	Year Approved	Max HOO Density (at approval)	% of Max Density	HQTA	Lot Consolidation
Cornerstone 9541-9581 W Ball Rd 127-284-01	49	1.45	33.79	CN Commercial Neighborhood	Office/Retail Building	2007	25	135%	No	N/A
Avenida Villas 9602-9612 W Ball Rd	29	0.82	35.37	R3	Medical Office Building	2011	43	82%	No	2 parcels, less than half acre in size
Buena Vista 16451 E Buena Vista St	17	0.51	33.33	C2	Vacant	2011	25	133%	No	2 parcels, less than half acre in size
Stonegate I 9051 Katella	38	1.15	33.04	C1	Commercial/Car and RV storage	2009	25	132%	Yes	2 parcels
Stonegate II 8911 Katella	26	0.76	34.21	C1	Commercial/ RV rentals	2009	25	137%	Yes	N/A
Cerritos Family 9501 W Cerritos	60	2.047	29.31	R2 Multifamily Dwellings	Church	2012	43	68%	No	Unknown
Potter's Lane 15171 Jackson	16	0.41	39.02	C2	Single-Family Residential Unit	2017	25	156%	Yes	No
Casa Paloma 15162 Jackson,	71	1.12	63.39	C2	Pottery Manufacturing Facility	2022	25	254%	Yes	No
Jackson Street 15081 Jackson Ave, 15072 Adams, 15082 Adams	65	0.745	87.25	C2	Single family and automotive use	2022	70	125%	Yes	3 parcels, less than half acre in size

Table B-15
Recent Non-HOO Residential (R-3) Project List

Parcel Address	Reporting Year	Units	Acres	Density (du/ac)	Zoning	Max Density Allowed	HOO	HQTA	% of Max Density	Prior Use	Lot Consolidation
14892 Van Buren St Midway City	2021	3	0.18	16.69	R3	43.50	No	Yes	38%	Vacant	No
14621 Adams St, Midway City	2020	4	0.22	18.18	R3	43.50	No	Yes	42%	SFD	No
14881 Newland St Midway City	2020	4	0.18	22.26	R3	43.50	No	Yes	51%	Duplex	No
14682 Adams St Midway City	2020	4	0.4	10.81	R3	43.50	No	Yes	25%	SFR	No
14672 Adams St Midway City	2020	4	0.4	10.81	R3	43.50	No	Yes	25%	SFR	No

Religious Institutions

The site inventory includes several religious institutions sites with excess vacant property or large parking lots which could accommodate residential development. Removal or replacement of church buildings is not assumed. SB 4, effective 2024 stipulates that faith-based organization or nonprofit college maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel. Realistic capacity on the three religious institution sites within the HOO assume maximum density (see section above).

Other: RMV/Coyote Canyon

Realistic capacity on the County-approved Coyote Canyon site is assumed to be about 6 du/ac. This low-density assumption is based on densities for similar projects and in consideration of site characteristics.

Rancho Mission Viejo is a Planned Community in south Orange County originally approved for 14,000 units in 2004. Planning Area 3 of the community is expected to be submitted for approval and is anticipated to accommodate approximately 4,166 units within the 2021-2029 6th Cycle Housing Element Period. When developing the 2021-2029 RHNA Allocation Plan, SCAG utilized Orange County Projections (OCP) 2018 which each local jurisdiction, including the County, participated in its development and provided population, employment, and housing growth data for the current planning period. The forecast data submitted by the County included information provided by Rancho Mission Viejo. Rancho Mission Viejo forecasted that they would construct 4,166 dwelling units by the end of the 2021-2029 Housing Element planning period. These dwelling units were included in the County's forecast of new construction and are reflected in OCP 2018, the dataset used by SCAG to determine the County's RHNA allocation. Full buildout of the 14,000 units in the Rancho Mission Viejo planned community is expected in approximately 25-30 years. Only the 4,166 units included in the SCAG OCP are included in this site inventory.

Densities Appropriate for Accommodating Lower-Income Housing

Affordability is dependent on density allowed, capacity, and size. The capacity of sites that allow development densities of at least 30 units per acre are credited toward the lower-income RHNA, as allowed by State law. The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by State law (at least

30 units per acre for Orange County), HCD is obligated to accept sites with those density standards (30 units per acre or higher) as appropriate for accommodating the jurisdiction's share of regional housing need for lower-income households. Land use designations with density ranges near the default density are considered appropriate to accommodate housing for moderate-income households.

- HOO: All HOO sites (which require inclusion of affordable housing) are included under the sites requiring rezoning and as such must meet the State-designated default density standard (at least 30 du/ac) and meet the shortfall requirement of accommodation at least 16 units to be credited toward the lower-income RHNA. HOO sites under 0.5 acres in size or those sites with a capacity less than the 16 units (shortfall requirement) are credited toward the moderate- and above-moderate-income RHNA shortfall.
- Religious Institutions: The site inventory includes several religious institutions sites with excess vacant property or large parking lots, which could accommodate residential development. SB 4, effective 2024 stipulates that faith-based organization or nonprofit college maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel.

Large and Small Sites

Consistent with updated Housing Element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower-income sites inventory presented in this section is predominately limited to parcels between 0.5 and 10 acres in size, as state law has indicated these size parameters can best accommodate lower-income housing development. The only large sites included have commitments to the development of affordable housing. Sites meeting the default density standard (at least 30 du/ac) but are under 0.5 acres in size are credited toward the moderate-income category as are sites that meet the default density standard and are larger than 0.5 acres but cannot accommodate 16 units as required by the shortfall requirements.

Exclusive of the Rancho Mission Viejo Master Plan area, Coyote Canyon, and religious institution sites, the average site size (which may contain multiple parcels) is 1.7 acres with a median size just under one acre (0.8 acres). In general, small site development is still a realistic approach as the County of Orange has previous recent experience developing affordable housing on sites smaller than half an acre (Potter's Lane). All but one of the nine affordable multifamily

developments in **Table B-14** were developed on sites larger than the inventory average (1.7) and five of those projects on sites that are 0.8 acres or smaller.

- Small Sites: Due to the historical parcelization pattern in the older areas of the Unincorporated County, the inclusion of small sites in the inventory is expected. Nonetheless, to adhere to State law and HCD guidance, there are no stand-alone small sites used to meet the lower-income RHNA. Small parcels are included in the inventory but only as part of a larger, multi-parcel sites. Those sites must meet the 30du/ac default density and the 16-unit capacity requirements for shortfall (rezoning) sites to be credited toward the lower-income RHNA. Small sites (less than 0.5 acres or those sites with a capacity less than the 16 units required by law) are credited toward the moderate- and above-moderate-income RHNA shortfall. In general, small site development is still a realistic approach as the County of Orange has previous recent experience developing affordable housing on sites smaller than half an acre. **Table B-16** shows specific examples of affordable housing developments the County has completed on parcels that are half an acre or less in size.

Table B-16
Affordable Development – Small Site Examples

Project	Location	Parcel Size (ac)	Density (du/ac)	Total Units (by affordability level)
Buena Vista PA 100017	16451 Buena Vista St., Orange	0.5	34	17 Units (6 extremely-low-, 8 very low-, 3 low-)
Potter's Lane PA 150058	15171 Jackson Street, Midway City	0.41	39	16 Units (15 very low 1 above-mod Manager's Unit)
*Note: The County of Orange does not track historic lot consolidations. Many of the HOO fully affordable projects shown in **Table B-3** are the product of a consolidation of small lots as discussed below.*				

- Large Sites: two large sites are included in the inventory and the capacity credited to the lower-income RHNA is limited to units that the property owners have committed to providing.
    - Rancho Mission Viejo Planning Area 3 spans 385 acres and the owners have forecasted that they would construct 4,166 dwelling units by the end of the 2021-2019 Housing Element planning period. As part of a 2016 a General Plan amendment and development agreement, the property owner is required to comply with the Affordable Housing Implementation Agreement (AHIA), which requires inclusion of 165 lower-income units in Planning Area 3Coyote Canyon is a 375-acre former landfill property that is owned by the County of Orange. Only the units that the County has committed to set aside for deed-restricted, affordable housing are assumed to be affordable to lower-income households (see Program 3). The County

has developed a large site similarly in Rancho Mission Viejo within the last planning period, Specifically, Sendero Bluffs and Esencia Norte in Rancho Mission Viejo include a total of 219 lower-income units as well as moderate- and above-moderate-income units. A similar approach is proposed for the Coyote Canyon sites. The County thus has a proven track record of developing lower-income housing on large sites along with other types of housing.

While not falling under the large site size parameters set by State law, the inventory includes three stand-alone sites that are between 4.5 and 7.8 acres in size. Due to the densities on these sites (>30 du/ac) capacity can be credited toward the lower-income RHNA. However, as a more conservative approach, the capacity is split evenly between the lower- and moderate-income category. This approach provides flexibility for the potential development of mixed-income housing.

APPENDIX C: PUBLIC PARTICIPATION SUMMARY

Public participation is an important component of the planning process. 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 Assessment of Fair Housing (AFH). As part of the 6th Cycle Housing Element Update process, the County of Orange has provided residents and other interested parties numerous opportunities for review and comment. These engagement efforts included community workshops and meetings, meetings with Housing Element Resource Team, online and digital outreach, and public hearings. This proactive outreach effort invited broad involvement throughout the analytical and policy development phases of the project.

The following is a list of meetings and hearings held during the Housing Element update process.

February 16, 2021	Community Workshop #1
February 17, 2021	Resource Team #1
September 27, 2021	Community Workshop #2
September 28, 2021	Resource Team #2
October 27, 2021	Planning Commission Study Session
March 14, 2023	Rossmoor Community Services District Meeting
September 5, 2024	Housing Element Update Webinar

Notices of all Housing Element public hearings were published in the local newspaper in advance of each meeting, as well as posting the notices on the County's website:

https://ocds.ocpublicworks.com/. The draft Housing Element was made available for review at County offices and posted on the website.

For the 2021-2029 Housing Element Update, OC Development Services conducted the following:

- Sent invitations to all of the advisory and non-advisory committees within the County of Orange (North Tustin Planning Advisory Committee, Coto de Caza Planning Advisory Committee, Orange Park Acres, Foothill Trabuco Specific Plan Review Board, Rossmoor Homeowners Association, etc.) for the Community Workshops.
- Requested that Kennedy Commission, Abrazar and La Colonia Independencia community centers send an email notice about the Community Workshops to those on their mailing list.

On August 26, 2024, the County released an updated Draft Housing Element with changes that address findings received in September 2023 from the California Department of Housing and Community Development (HCD). Community members, agencies, and organizations were invited to comment on the Draft Housing Element during a 15-day public review period (from August 26 to September 9, 2024). The community was notified of the opportunity to comment on the Draft through posts on the County's dedicated Housing Element webpage and via social media (Facebook, Twitter, and Instagram). Direct email invitations were sent to community members or organizations that have asked to be notified or that have previously provided feedback in addition to the Planning Commission and Board of Supervisors offices and all County advisory committees. On September 5, 2024, a webinar was hosted to provide background information on the Housing Element update process, share the latest edits to the County's 2021-2029 Housing Element, and to answer questions or obtain feedback. A recording of the webinar was also posted on the County's Housing Element webpage. One letter of support was received during this time.

On November 12, 2024, the County released an updated Draft Housing Element with changes that address feedback received from HCD on the September 2024 draft through phone calls and emails. As with previous drafts, the community was notified of the opportunity to comment on the Draft through posts on the County's dedicated Housing Element webpage and via social media (Facebook, Twitter, and Instagram). Direct email invitations were sent to community members or organizations that have asked to be notified or that have previously provided feedback in addition to the Planning Commission and Board of Supervisors offices and all County advisory committees.

A community survey was also circulated to various agencies and groups and translated in Spanish and Vietnamese. Oral translation services were also available upon request. Links to the community survey were posted on the County's social media outlets. The survey generated 249 responses, and the results were as follows:

- The community was able to select 3 areas where they envisioned growth. 74 responses went to Ladera Ranch, 69 responses went to Rancho Mission Viejo, 62 responses to Foothill/Trabuco, 61 responses to Midway City, 59 responses to Silverado-Modjeska, and 56 responses towards North Tustin.
- The community was then asked to select 3 areas for where they want to see more housing. 165 responses went to areas in older shopping centers, and 140 responses supported areas near transit.
- When asked what type of housing was most needed, 109 responses were for single-family detached homes, 98 for senior housing, and 81 for multifamily housing.

- The community was asked to select 3 housing-related concerns. 103 responses were related to low inventory of available housing, 95 responses were for lack of available sites, and 91 responses were for lack of affordable housing.
- There were 80 write-in comments, which included a need for more affordable housing, density (for and against), maintaining existing neighborhoods, opposing ADUs in single family neighborhoods, opposing development in high fire areas (i.e., canyons), higher density near transit, along with some concerns related to homelessness, and traffic.

Each draft of the Housing Element Update was made available for public review and comment on the County's website. Notification of availability was emailed to the Housing Element email distribution list. Comments were reviewed and addressed prior to submittal to State HCD.

Table C-1 provides a summary of public comments and how those comments have been addressed in this Housing Element.

Figures C-1 to C-3 provide the letters of support received for the County of Orange 2021-2029 Housing Element.

Table C-1
Summary of Public Comments

Comment	Response
What is the County doing to reach out to the community?	County staff, in collaboration with the consultant, hosted community workshops to discuss the Housing Element Update in February and September 2021. In particular, invitations were circulated to advisory and non-advisory committees (North Tustin Planning Advisory Committee, Coto de Caza Planning Advisory Committee, Orange Park Acres, Foothill Trabuco Specific Plan Review Board, Rossmoor Homeowners Association, etc.); advocacy groups; community centers; and posted on the County's Social Media Outlets. The Housing Element Community Survey and Flyers were translated to Spanish and Vietnamese. Oral translation services were also available upon request.
The County needs more affordable housing.	The County recognizes the need for affordable housing, housing for homeless and special needs, and housing for all income levels. OC Public Works has been collaborating with our housing partners at OC Community Resources on various affordable housing developments within Unincorporated Orange County. In particular, the County's Housing Opportunities Overlay has led to the development of eight (8) affordable housing projects since 2006.
What sort of strategies are being incorporated into the County's Housing Element?	To encourage and facilitate the development of Accessory Dwelling Units (ADUs), County staff posted an ADU Flyer on our website, and released a Request for Proposal (RFP) to select a consultant to prepare pre-approved ADU plans. In 2018, the County issued permits for 23 ADUs, followed by 21 ADUs in 2019, 51 ADUs in 2020, 57 ADUs in 2021, and 64 ADUs in 2022. Since 2018, the County has seen a 178% increase in the number of issued permits for ADUs. This trend reflects a continued increase in ADU activity. As for other innovative strategies, the County provided financing and entitlements for Potter's Lane, a 16-unit shipping container development in Midway City. In order to address the number of very low- and low-income RHNA units, the Board of Supervisors adopted an amendment to the Housing Opportunities Overlay Zone regulations to

Table C-1
Summary of Public Comments

Comment	Response
	increase density from 43 to 70 units per acre for sites located within the County's Housing Opportunities Overlay, excluding any applicable density bonus.
How were the Housing Element sites selected?	In general, the land inventory is a listing of candidate sites for development. A developer would have to submit a proposed application for the site to make the development come to fruition, and market conditions would dictate the type of housing to be built and population to be served. Characteristics that have been taken into consideration when evaluating the appropriateness of sites include physical features (e.g., size and shape of the site) and location (e.g., proximity and access to infrastructure, transit, job centers, etc.). As an example, the candidate sites within the Housing Opportunities Overlay are also near public transit and other amenities, particularly within Unincorporated Anaheim, Unincorporated Stanton, and Midway City. In particular, since the County's Housing Opportunities Overlay successfully led to the development of multiple affordable housing developments, County staff is anticipating approximately 4,384 units within the Overlay for this upcoming 6th Cycle Housing Element. Also, Rancho Mission Viejo encompasses a large portion of Unincorporated Orange County, so the land inventory reflects 4,166 total units within Rancho Mission Viejo for this upcoming 6th Cycle Housing Element. The County's area is decreasing as a result of annexations, thus smaller sites that may be merged and consolidated have also been incorporated into the land inventory. As an example, Potter's Lane was located on a site less than 1 acre.
Do short-term rentals have an impact on the County's Housing Element?	The County adopted short-term regulations within the Comprehensive Zoning Code Update, which was adopted in July 2020, as a result of the proliferation of short-term rentals in Unincorporated Orange County. From July 2020 through June 30, 2023, 76 short-term rental permits have been approved, Based on the number of STRs that we are aware of, there would be a minimal impact in the housing inventory.
Was consideration given to the walkability of jobs and services in the non-residential areas of Rossmoor from nearby residential areas? This is the only remaining commercial area surrounded by residential uses in Rossmoor.	In general, the candidate sites are identified in the inventory as they have potential for residential development; however, the market conditions would dictate whether development comes to fruition. Developments within the County's Housing Opportunities Overlay could either be residential or commercial. The surrounding uses around the Rossmoor commercial center were considered, and the sites were selected due to factors such as lot size. Walkability was considered when selecting candidate sites, and the County has taken into consideration surrounding uses and their proximity to transit and amenities.
The community requested that a Silverado-Modjeska site be removed due to potential concerns related to flood, fire, lack of access to amenities, septic regulations, etc.	After careful consideration of the public comments, the proposed Silverado site (Assessor Parcel Number 876-034-04) has been removed from the Draft Housing Element; however, based on upcoming feedback from State HCD, County staff may be required to reassess all sites, including those that have been removed.
Candidate sites located within the County's Draft Housing Element have also been identified in other jurisdiction's Draft Housing Elements.	In general, jurisdictions usually identify sites that are within their jurisdictional boundaries; however, Housing Element Law does allow jurisdictions to identify sites within their sphere of influence.
Some of the candidate sites within the County's Draft Housing Element are located	The Housing Element itself serves as a planning document, which provides candidate sites that are appropriately zoned to meet the County's RHNA at all income levels.

Table C-1
Summary of Public Comments

Comment	Response
in close proximity to John Wayne Airport (JWA), thus within JWA Safety Zones, Noise Contours and Part 77 Obstruction Surface Areas, and Notification Areas.	Environmental concerns, such as safety are addressed in the Draft Housing Element. The Airport Land Use Commission (ALUC) found the County's Draft Housing Element Update consistent with the existing Airport Environs Land Use Plan (AELUP) for JWA on January 11, 2022. Any proposed projects within the JWA AELUP would be subject to review by ALUC to determine whether they are consistent with the AELUP If/when a developer proposes an application on one of the candidate sites, additional environmental analysis for noise and safety would be conducted at that time.
Banning Ranch, a vacant site located on the north side of Pacific Coast Highway, was identified in the County's 5th Cycle Housing Element as a site to accommodate future housing needs and identified in the Housing Element Update. There have been comments supporting the inclusion of Banning Ranch in the County's Land Inventory and comments requesting its exclusion. Banning Ranch offers the potential for 1,475 units towards meeting the RHNA.	After careful consideration of the following: (1) recent efforts to conserve Banning Ranch as open space, including a private grant of $50 million, the California Department of Fish and Wildlife's announcement of a $8 million grant, and the United States Fish and Wildlife Service's announcement of a $11 million grant all to support the purchase of Banning Ranch by the Trust for Public Land, which recently entered into an exclusive agreement with the property owner to purchase the property; (2) past efforts to develop areas of Banning Ranch have been unsuccessful due to non-compliance with the California Environmental Quality Act (See e.g. Banning Ranch Conservancy v. City of Newport Beach, 2 Cal.5th 918 (2017), making the area challenging and costly to develop; and (3) Banning Ranch contains wildlife habitat that hosts endangered or threatened species and is designated for special protection under the Coastal Act, the Banning Ranch area is not reflected in the County's Draft Housing Element Update.
The County issued permits for a limited number of affordable housing units during the 5th Cycle Housing Element. Suggest using County-owned sites and adopting an inclusionary housing policy to encourage the development of affordable housing.	Though potential housing opportunity sites are identified in the Housing Element, market conditions dictate whether housing will be built, the type of housing, and the actual income limits for that unit. The County has been successful in utilizing County-owned properties for affordable housing developments, as exemplified by the Crossroads at Washington project in the City of Santa Ana, and the Placentia Veteran's Village project in the City of Placentia and will continue to collaborate with CEO Real Estate on future affordable housing opportunities. Staff will continue to explore other innovative strategies to encourage affordable housing development, such as inclusionary housing.
Hills for Everyone requested that the Unincorporated Area: City of Brea (Aera Parcels) sites either be eliminated from consideration, or the number of units identified be revised.	After careful consideration of the comment letter received, the proposed 1,857 units from the Unincorporated Area: City of Brea (Aera Parcels) was removed from the Land Inventory.
Hills for Everyone supports the modification of the document that specifically excludes the "Brea Canyon Parcels" (Aera Energy) property from the Housing Element Site Inventory. With this modification, Hills for Everyone supports the proposed Housing Element Update as revised.	No response or changes necessary.

Figure C-1
Letter of Support – C&C Development

C&C Development

Megan Kirkeby, Deputy Director
Housing Policy Development
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

RE: County of Orange Housing Opportunities Overlay Zone

Dear Ms. Kirkeby,

It is my pleasure to write a letter of support for the County of Orange Housing Opportunities Overlay Zone adopted by the Board of Supervisors in 2006. Through this innovative program, over 100 rental units reserved exclusively for lower-income families have been built in the unincorporated area.

Our organization C&C Development Co., LLC built the Buena Vista Apartments in the Orange area in 2009. Taking advantage of the County's Housing Opportunities Overlay Zone for Affordable Housing.

My organization fully supports the efforts of the County of Orange to provide as many viable sites as possible for the future development of much needed affordable housing in Orange County.

Sincerely,

Todd Cottle

Owner

C&C Development Co., LLC

Figure C-2
Letter of Support – American Family Housing



American Family Housing

Welcome Home

February 7, 2022

Megan Kirkeby, Deputy Director
Housing Policy Development
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

Dear Deputy Kirkeby,

It is my pleasure to write a letter of support for the County of Orange Housing Opportunities Overlay Zone adopted by the Board of Supervisors in 2006. Through this innovative program, over 100 rental units reserved exclusively for lower-income families have been built in the unincorporated area.

My organization fully supports the efforts of the County of Orange to provide as many viable sites as possible for the future development of much needed affordable housing in Orange County. As a nonprofit developer, American Family Housing has made use of the County's Housing Opportunities Overlay Zone regulations in support of helping the County of Orange address its regional housing needs.

Our organization built Potters Lane (16 units deed restricted as affordable), which opened in 2017. We are also set to achieve certificates of occupancy in June 2022 at Casa Paloma (71 units, of which 48 would be deed restricted as affordable). The County's Overlay Zone is critical to enabling the County to achieve its goals by making available parcels that were previously not available for residential development.

We appreciate the excellent working relationships that County staff has with housing developers, including American Family Housing, and would like to submit a letter of support for the County's Housing Opportunities Overlay Zone to the California Department of Housing and Community Development (HCD).

Sincerely and with appreciation,

Milo Peinemann
Chief Executive Officer

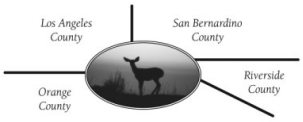
www.AFHusa.org

O 714.897.3221 · F 714.893.6858
15161 Jackson Street, Midway City, CA 92655

Figure C-3
Letter of Support – Hills for Everyone

Hills For Everyone

Southern California comes together at the Puente-Chino Hills



September 2, 2024

Comments Submitted via Email to: OCHousing@ocpw.ocgov.com

Justin Kirk, Deputy Director
Development Services Department
County of Orange
601 N. Ross St.
Santa Ana, CA 92701

RE: Housing Element Update (Public Review Version, August 2024)

Dear Deputy Director Kirk,

Hills For Everyone writes these comments as a follow up to our letter submitted on September 28, 2023. We are in receipt of the Housing Element Update (Public Review Version, August 2024) and have reviewed the relevant sections.

We support the modification of the document that specifically excludes the "Brea Canyon Parcels" (Aera Energy) property from the Housing Element Site Inventory.

With this modification, Hills For Everyone supports the proposed Housing Element Update as revised. Should you have any questions, please reach out to me (714) 996-1572.

Sincerely,

Claire Schlotterbeck

Claire Schlotterbeck
Executive Director

P.O. Box 9835 • Brea, CA 92822-1835 • www.HillsForEveryone.org



OC Public Works
OC Public Works | Development Services
601 N. Ross Street, Santa Ana, CA 92701

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

September 28, 2023

Justin Kirk, Deputy Director
Development Services Department
County of Orange
601 N. Ross St.
Santa Ana, CA 92701

Dear Justin Kirk:

RE: County of Orange's 6th Cycle (2021-2029) Revised Draft Housing Element

Thank you for submitting the County of Orange's (County) revised draft housing element received for review on July 31, 2023. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Elizabeth Hansburg of People for Housing OC pursuant to Government Code section 65585, subdivision (c).

The revised draft element addresses many statutory requirements described in HCD's February 7, 2023 review; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

Public participation in the development, adoption, and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the County should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent

Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the County will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the County to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the hard work and the County's planning staff provided during the update and review. We are committed to assisting the County in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Reid Miller, of our staff, at Reid.Miller@hcd.ca.gov.

Sincerely,



Melinda Coy
Senior Program Manager

Enclosure

APPENDIX
COUNTY OF ORANGE

The following changes are necessary to bring the County's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at https://www.hcd.ca.gov/planning-and-community-development/hcd-memos. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks and includes the Government Code addressing State Housing Element Law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A))*

   Integration and Segregation: While the element was revised to include adequate analysis of integration and segregation based on race and ethnicity, it must still be revised to provide the same analysis for patterns of integration and segregation based on disability, familial status, and income. As noted in HCD's February 7, 2022 review this analysis must include complete local and regional data on integration and segregation for the unincorporated County and analyze it for both local and regional trends and patterns over time.

   Disproportionate Housing Needs: While the element was revised to provide further data on overcrowding, cost burden, housing conditions, and homelessness and provides some general analysis, it must still analyze the data for trends and geographical patterns over time both locally and regionally and provide additional analysis as to the potential causes of these patterns and trends.

   Local Data and Knowledge: While the element was revised to include some additional local data for disproportionate housing needs, it largely was not revised to meet this requirement. As stated in HCD's December 27, 2021 review, the element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.

   Identified Sites and Affirmatively Furthering Fair Housing (AFFH): While the element was revised to provide an analysis of sites in relation race and ethnicity and income, it must provide the same analysis for disability, familial status. In addition, the element

also requires an analysis of the placement of sites in relation to disproportionate housing needs and access to opportunity. The element should discuss whether the distribution of sites improves or exacerbates existing conditions, and if sites do exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

2. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   Sites Inventory: While the element was revised to provide an estimate of potential development by income on a per parcel basis, there continues to be inconsistencies with a number of tables (e.g., Figures B-13, B-14, and B-20) where the proposed total is inconsistent with the actual sum of the individual unit or acreage subtotals. The County should reevaluate all sites inventory tables to ensure consistency and be sure to include an estimate of size and capacity for each parcel.

   Realistic Capacity: While the element was revised to provide examples of recent development using the Housing Opportunity Overlay (HOO) in Table B-2, it appears all the example sites develop at densities consistently lower that the 70 dwelling units per acre the County is assuming (the maximum density the HOO allows). In order to assume this density and apply it to sites in the inventory; the element must provide evidence of specific trends; patterns or other evidence that led to and justify these assumptions. Additionally, the capacity methodology must account for development standards or other factors that could limit the capacity.

   Suitability of Nonvacant Sites: The element was not revised to meet this requirement. As stated in HCD's February 7, 2022 and December 27, 2021 reviews, trends and analysis need to support the redevelopment potential of identified sites, and the analysis must demonstrate that the existing uses do not pose and impediment to new housing development within the planning period. The element should use development and market trends in the County and surrounding region, and specifically connect the characteristics of those trends of development to sites in the inventory.

   Large Sites: The element did not address this finding, as it does not provide information indicating sites of equivalent size and affordability to those large sites included in the inventory were successfully developed during the prior planning period. Please see HCD's February 7, 2023 review, with particular attention to the suggested framework of analysis for large sites in specific plan areas.

   Small Sites: The element was not revised to meet this requirement. Please see HCD's February 7, 2023 review for an outline of the required analysis.

   Accessory Dwelling Units (ADUs): While Program 6 (Accessory Dwelling Units) was revised to commit to establishing an ADU monitoring program sooner in the planning period with more frequent monitoring, the element's ADU projections were not revised as requested in HCD's February 7, 2023 review, nor has adequate additional analysis

or support for these projections been included. the element should be revised to reduce the number of ADUs to accommodate the County's Regional Housing Needs Allocation (RHNA).

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the County must submit an electronic sites inventory with its adopted housing element. The County must utilize standards, forms, and definitions adopted by HCD.

3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). (Gov. Code, § 65583, subd. (a)(5).)*

   Local Processing and Permit Procedures: While the element has been revised to provide a general analysis of the approval process and procedures, it must still include typical findings for each type of permit, as well as any discretionary approval procedures and findings for single-family and multifamily development. Programs to address potential constraints may need to be revised based on this completed analysis.

   Constraints on Housing for Persons with Disabilities: While the element has been revised to address how non-licensed group home facilities that serve seven or more residences is permitted, its conclusion that requiring a use permit for group homes with seven or more residents is not a constraint because no group home facilities of seven or more have been denied thorough the use permit process is erroneous. As stated in HCD's February 7, 2023 review, Zoning and standards should simply implement a barrier-free definition of family instead of subjecting, potentially persons with disabilities, to special regulations. Zoning code regulations that isolate and regulate various types of housing for persons with disabilities based on the number of people and other factors pose a constraint on housing choice for persons with disabilities, and program actions should be added to the element to remove this use permit requirement.

4. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section*

65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)

While the element has been revised to provide and analysis of a number of factors that play a role in the length of time between receiving approval for a housing development and submittal of an application for building permits, it must provide a specific time frame for both single and multifamily developments.

B. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

   While the element revised a number of programs and added additional actions based on newly provided data and analysis, it largely was not revised to meet the requirements of this finding. Please see HCD's February 7, 2023 review.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.*
   *(*Gov. Code, § *65583, subd. (c)(1).)*

   As noted in Finding A2, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

   Program 1 (Provide Adequate Sites and Monitor for No Net Loss): While HCD understands the County adopted new zoning to meet some requirements in Program 1 to increase

allowed density in the HOO, it must provide information that those rezonings meet the requirements in Government Code section 65583.2, sub. (h) and (i). Specifically, information is necessary to determine compliance with the following provisions:

- permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval.
- accommodate a minimum of 16 units per site;
- require a minimum density of 20 units per acre; and
- at least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all the very low and low-income housing need, if those sites:
    - allow 100 percent residential use, and
    - require residential use occupy 50 percent of the total floor area of a mixed-use project.

In addition, please be aware, the recent California appellate decision in *Martinez v. City of Clovis*[1] found that while overlays can be used in a rezone, when the base zone allows residential development, both the base zone and the overlay zone must comply with the minimum density requirements of Government Code section 65583.2, subdivision (h). The County should analyze how this decision may impact its current rezone strategy using the HOO and may need to adjust accordingly.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

   As noted in Findings A3 and A4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints.

4. Promote and AFFH opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)

   As noted in Finding A1, the element requires a complete AFFH analysis. The element must be revised to add goals and actions based on the outcomes of a complete analysis.

[1] *Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193, 307 Cal.Rptr.3d 64

NOTICE OF INTENT TO ADOPT NEGATIVE DECLARATION

In compliance with section 15072 of the California Environmental Quality Act (CEQA) Guidelines and the County of Orange Procedures, notification is hereby given to responsible agencies, trustee agencies, interest groups and the general public, that the County of Orange **shall adopt Negative Declaration (ND) File Numbers Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01.**

PUBLIC REVIEW: The proposed ND is being circulated for public review from July 12, 2022 to August 10, 2022 to comply with the required minimum 30-day public review period. The ND may be adopted by the County of Orange and become final unless written comments on its appropriateness or adequacy are received by the office listed below **by 5:00 p.m. on the ending date of the public review period (August 10, 2022).**

CONTACT PERSON: Kevin Shannon **PHONE:** (714) 667-1632
Kevin.Shannon@ocpw.ocgov.com

PUBLIC MEETING(S)/HEARINGS ON PROJECT:
The proposed project will be reviewed for approval by the decision-maker listed below.

DECISION MAKING BODY: Orange County Planning Commission

DATE: To Be Determined **TIME:** 1:30 PM or soon thereafter

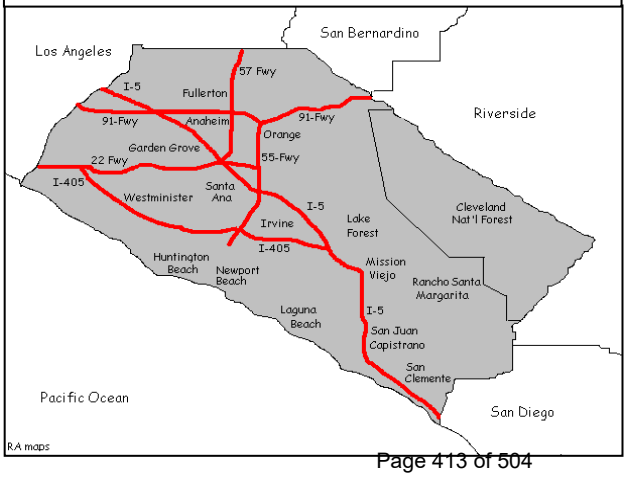
LOCATION OF PUBLIC MEETING/HEARING: See location map below.

The ND and any supporting attachments are available for review during normal business hours at the offices of the OC Public Works, OC Development Services/Planning, 601 North Ross Street, Santa Ana, CA 92701 and also available at the following website: https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2

Public Hearing Location - County of Orange
Hall of Administration – 333 W. Santa Ana Blvd, Santa Ana 92702
Board of Supervisors Hearing Room



Project Location – Unincorporated Portions of County



DATE POSTED: July 11, 2022

NEGATIVE DECLARATION
OC PUBLIC WORKS
601 NORTH ROSS STREET
P. O. BOX 4048
SANTA ANA, CALIFORNIA 92701

In accordance with Orange County Board of Supervisor's policies regarding implementation of the California Environmental Quality Act, the County of Orange has conducted an Initial Study to determine whether the following project may have a significant adverse effect on the environment. On the basis of that study, the County of Orange hereby finds that the proposed project will not have a significant adverse effect on the environment and does not require the preparation of an Environmental Impact Report because either the proposed project:

☒ **has** or **creates no** significant environmental impacts requiring mitigation; or

☐ **will not create** a significant adverse effect, because the Mitigation Measures described in the Initial Study have been added to the project.

The environmental documents, which constitute the Initial Study and supporting technical studies provide the basis and reasons for this determination are available on the website and hereby made a part of this document.

PROJECT:

Title: Housing-Related Updates to the County of Orange General Plan and Comprehensive Zoning Code

Location: Unincorporated portions of Orange County, CA

Description: In accordance with State law, the County is required to update its Housing Element every eight years, which includes an amendment to the Land Use Element and the Safety Element. An Environmental Justice Element is also required to be created when two or more existing General Plan elements are concurrently revised after January 2018. The Zoning Code requires revisions to the existing Housing Opportunities Overlay to maintain consistency with programs included Housing Element Update.

Project Proponent or Applicant: County of Orange, OC Public Works, Development Services/Planning

Department Responsible for Proposed Project: OC Public Works, Development Services/Planning

Address: 601 North Ross Street, Santa Ana, CA 92701

Project Contact Person: Kevin Shannon, Consultant - Env. Planner **Telephone:** (714) 667-1632

CEQA Contact Person: Kevin Shannon, Consultant - Env. Planner **Telephone:** (714) 667-1632

NOTICE: The Negative Declaration shall become final unless written comments are received by the office listed above by **5:00 p.m. on August 10, 2022.** If you wish to provide comments on the appropriateness or adequacy of this document, address your written comments to our finding that the project will not have a significant adverse effect on the environment: (1) identify the environmental effect(s), why they would occur, and why they would be significant, and (2) suggest any mitigation measures which you believe would eliminate or reduce the effect to an acceptable level. Regarding item (1) above, explain the basis for your comments and submit any supporting data or references.

Dated: August 11, 2022 Signed: Kevin Shannon

NOTE: This document and supporting attachments are provided to the general public for review. This is an information document about environmental effects only. Supplemental information is on file and may be reviewed in the office listed above. The decision-making body will review this document and potentially many other sources of information before considering the proposed project.

Public Review Draft
CEQA INITIAL STUDY
NEGATIVE DECLARATION

FOR
HOUSING-RELATED UPDATES TO THE COUNTY OF ORANGE GENERAL PLAN AND COMPREHENSIVE ZONING CODE

Housing Element Update HE 20-01
Safety Element Update SE 19-01
Land Use Element Update LUE 22-01
Environmental Justice Element EJ 22-01
Zoning Code Amendment CA 22-01

Prepared for:

Orange County Planning Commission
and
Orange County Board of Supervisors

Prepared by:

County of Orange
OC Public Works, Development Services/Planning
601 North Ross Street
Santa Ana, CA 92701

July 2022

Table of Contents

Section 1: Introduction 1
1.1 Project Title 1
1.2 Project Purpose 1
1.3 Lead Agency/Project Sponsor Name and Address 1
1.4 Intended Uses of Initial Study/Negative Declaration 1
1.5 Project Location 2
1.6 Native American Consultation 4
1.7 Scope of Environmental Analysis 4
1.8 Environmental Baseline 5
1.9 Environmental Determination 6
Section 2: Project Description 7
2.1 Project Background 7
2.2 Project Location and Environmental Setting 7
2.3 Project Characteristics 7
2.4 Project Approvals 11
Section 3: Environmental Evaluation 12
3.1 Aesthetics 12
3.2 Agriculture and Forestry Resources 14
3.3 Air Quality 16
3.4 Biological Resources 18
3.5 Cultural Resources 20
3.6 Energy 22
3.7 Geology and Soils 23
3.8 Greenhouse Gas Emissions 25
3.9 Hazards and Hazardous Materials 27
3.10 Hydrology and Water Quality 29
3.11 Land Use and Planning 32
3.12 Mineral Resources 34
3.13 Noise 35
3.14 Population and Housing 37
3.15 Public Services 39
3.16 Recreation 41
3.17 Transportation/Traffic 43
3.18 Tribal Cultural Resources 45
3.19 Utilities and Service Systems 47
3.20 Wildfire 49
3.21 Mandatory Findings of Significance 51
Section 4: List of Preparers 53

List of Figures

Figure 1: Regional Project Location 2
Figure 2: Orange County Unincorporated Areas 3

List of Tables

Table 1: Environmental Determination 6
Table 2: Public Agency Approvals 11
Table 3: List of Preparers 53

Section 1: Introduction

1.1 Project Title

Housing-Related Amendments to the County of Orange General Plan and Comprehensive Zoning Code

1.2 Project Purpose

This document is an Initial Study/Negative Declaration (IS/ND) for evaluation of potential environmental impacts per the requirements of the California Environmental Quality Act resulting from implementation of the Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01. For purposes of this document, the proposed project will be referred to as the Project or proposed Project.

1.3 Lead Agency/Project Sponsor Name and Address

County of Orange
OC Public Works, Development Services/Planning
601 North Ross Street
Santa Ana, California 92701

Contact Person and Telephone Number:
Cindy Salazar, Advance Planning Manager
OC Development Services/Planning
Telephone: 714.667.8870

1.4 Intended Uses of Initial Study/Negative Declaration

The County of Orange is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for carrying out or approving a Project which may have significant effects upon the environment.

This IS/ND is an informational document which is intended to inform the County of Orange decision-makers, other responsible or interested agencies, and the general public of the potential environmental effects of the proposed Project. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible agencies must balance adverse environmental effects against other public objectives, including economic and social goals (CEQA Guidelines Section 15021).

Public Resources Code Section 21080(c)(1) and implementing Guidelines Section 15070(a) states a Negative Declaration can be adopted if it can be determined that the Project will not have a significant effect on the environment. Based on this, the County of Orange, as Lead Agency, has determined that environmental clearance for the proposed Project can be provided with a Negative Declaration.

This IS/ND was prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 *et seq.*); the Guidelines for Implementation of the California Environmental Quality Act (Guidelines), as amended (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000, *et seq.*); and the County of Orange 2020 Local CEQA Procedures Manual.

This IS/ND may be inspected from July 12, 2022 through August 10, 2022, Monday through Friday during regular business hours, at OC Development Services/Planning in the County Administrative South Building, 601 North Ross Street, Santa Ana, CA 92701. In addition, this IS/ND is available on the County's website at the following link: https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2

1.5 Project Location

The Project location includes the unincorporated portion of Orange County. Orange County is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles. Refer to Figure 1 - Regional Location and Figure 2 - Orange County Unincorporated Areas.

Figure 1: Regional Project Location

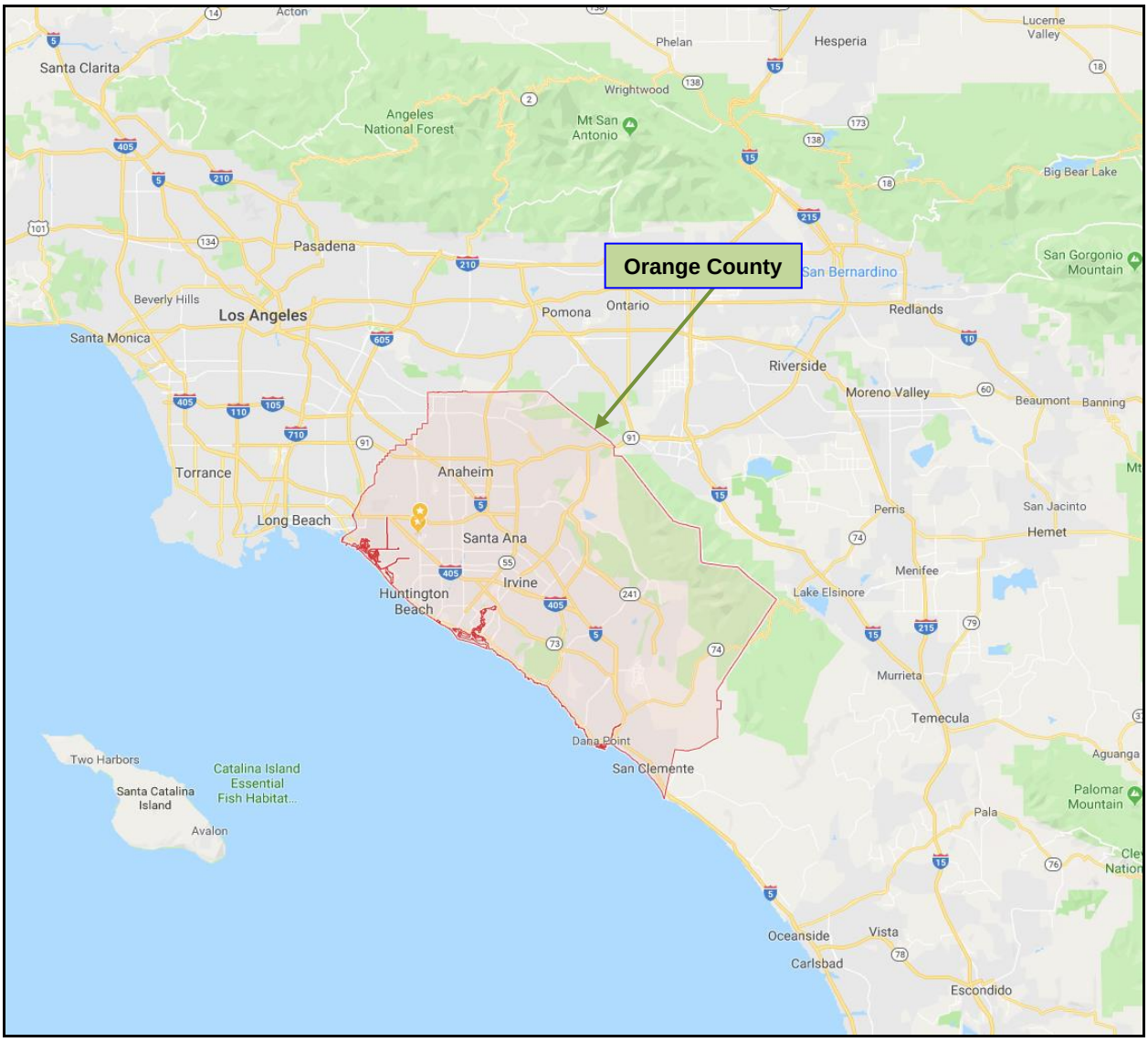
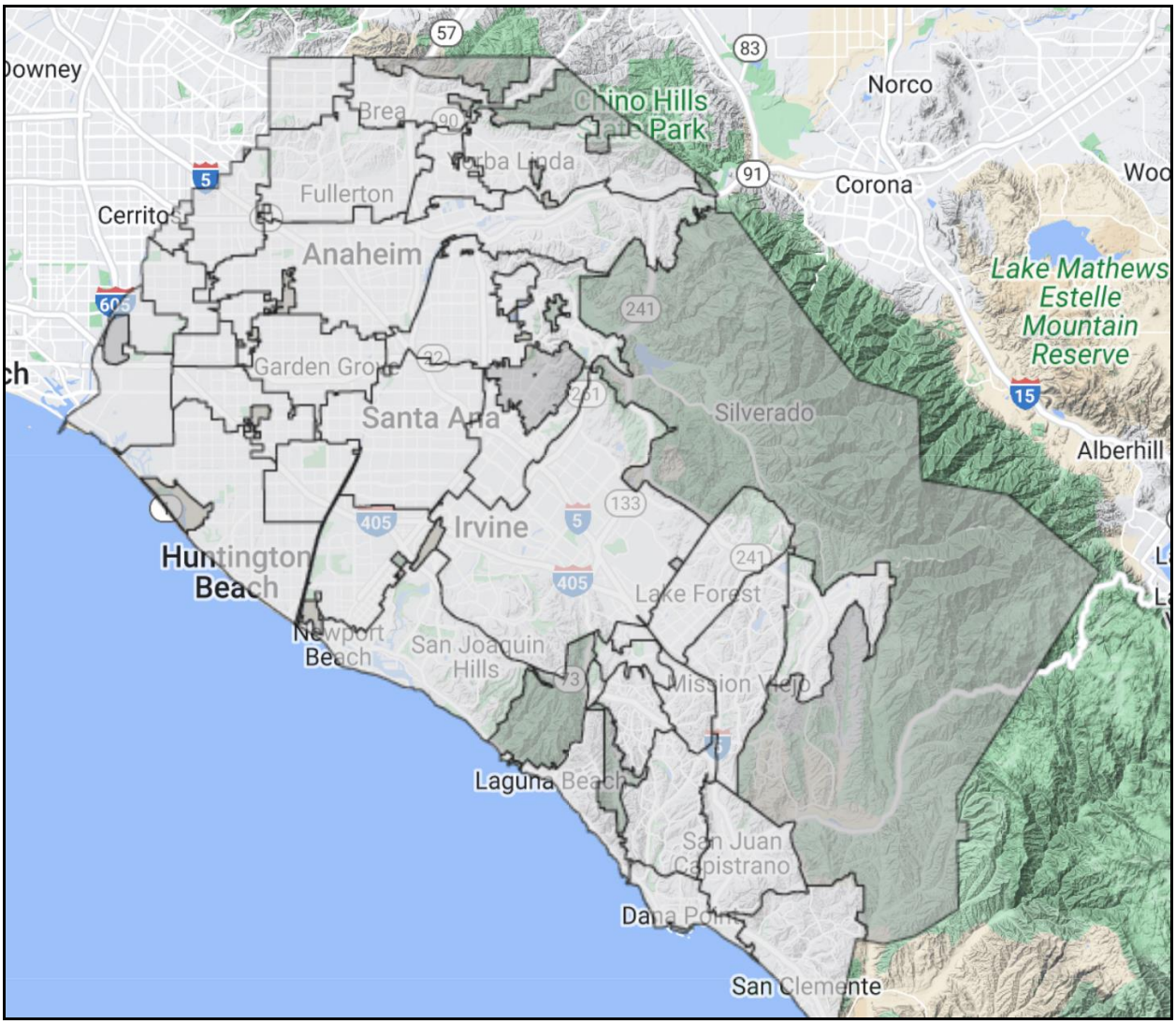


Figure 2: Orange County Unincorporated Areas



1.6 Native American Consultation

California Native American tribes traditionally and culturally affiliated with the Project area are required to be consulted pursuant to PRC Section 21080.3.1. OC Development Services/Planning sent via US Certified Mail AB 52 Initial Consultation letters AB 52 letters pertaining to the Housing Element and Safety Element on August 11, 2021, to the Kizh Nation, Gabrieleño Tongva San Gabriel Band of Mission Indians, Juaneno Band of Mission Indians, and the Soboba Band of Luiseno Indians. OC Development Services/Planning did not receive any requests for consultation.

1.7 Scope of Environmental Analysis

For evaluation of environmental impacts, each sample question from the Environmental Checklist Form contained in Appendix G of the CEQA Guidelines is stated and responses are provided according to the analysis undertaken as part of the IS/ND.

1.7.1 Thresholds of Significance

On November 17, 2020, the County adopted "Guidelines for Evaluating Vehicle Miles Traveled under CEQA" (VMT Guidelines), included as Appendix C in the County of Orange 2020 Local CEQA Procedures Manual. The VMT Guidelines included CEQA threshold thresholds of significance for vehicle miles traveled (VMT). Other than the VMT thresholds, the County has not adopted specific thresholds of significance and rather relies upon the specific questions relating to the topical environmental factors listed in Appendix G to the CEQA Guidelines to assist in the determination of whether an identified impact is potentially significant. The County may, depending on the circumstances of a particular project, use specific thresholds of significance on a case-by-case basis as provided by CEQA Guidelines Section 15064.7(b).

1.7.2 Impact Evaluation Methodology

The environmental impact methodology is described below.

Changes Not Evaluated

Construction Impacts – The Project does not authorize development or require physical changes to any existing development or infrastructure that would generate construction-related impacts. Therefore, they are excluded from the environmental analysis.

Indirect Impacts – The CEQA Guidelines require evaluation of indirect or secondary impacts to the environment which are caused by a project and are later in time and farther removed in distance, but are still reasonably foreseeable. Because these impact types must be related to a physical change in the environment and the Project has none, they are excluded from the environmental analysis. Any proposed developments would be individually reviewed to determine if they are exempt from the provisions of CEQA or require environmental review to determine the appropriate level of CEQA review.

Offsite Features – The Guidelines require evaluation of off-site features that are necessary to implement a project, which are typically associated with infrastructure or other physical improvements. Because the Project does not authorize development or require physical changes to any existing development or infrastructure, no offsite features would be required and the need to analyze impacts associated with offsite features would not occur. Therefore, they are excluded from the environmental analysis.

Changes Evaluated
Each of the topical environmental issues within each of the topical environmental factors evaluates the potential direct physical impacts to the environmental resources that has the potential to occur Project approval. The following topical environmental factors are evaluated in Section 3 - Environmental Evaluation. The numbers in parentheses represent the section numbers.

- Aesthetics (3.1)
- Agriculture & Forestry Resources (3.2)
- Air Quality (3.3)
- Biological Resources (3.4)
- Cultural Resources/Scientific Resources (3.5)
- Energy (3.6)
- Geology and Soils (3.7)
- Greenhouse Gas Emissions (3.8)
- Hazards & Hazardous Materials (3.9)
- Hydrology & Water Quality (3.10)
- Land Use & Planning (3.11)
- Mineral Resources (3.12)
- Noise (3.13)
- Population & Housing (3.14)
- Public Services (3.15)
- Recreation (3.16)
- Transportation/Traffic (3.17)
- Tribal Cultural Resources (3.18)
- Utilities & Service Systems (3.19)
- Wildfire (3.20)
- Mandatory Findings (3.21)

1.7.3 Impact Levels
There are four possible responses to the threshold of significance questions in each of the topical environmental factors in Section 3 - Environmental Evaluation:

1. *No Impact*: No substantial evidence exists that the Project would have a direct primary project-level impact on the environment.
2. *Less Than Significant Impact*: Direct project-level impacts have been identified but are less than the thresholds of significance and do not include or require mitigation measures.
3. *Less Than Significant Impact With Mitigation Incorporated*: Direct project-level impacts have been identified but are less than significant with the incorporation of mitigation measures thereby reducing an impact from Potentially Significant Impact to a Less Than Significant Impact.
4. *Potentially Significant Impact*: Potentially significant direct project-level impacts and have been identified and require preparation of an EIR.

1.8 Environmental Baseline
To adequately determine the significance of a potential environmental impact, the environmental baseline must be established. Guidelines Section 15125(a) states in pertinent part that the environmental setting will normally constitute the baseline physical conditions, by which a lead agency will determine if an impact is significant.

Therefore, the environmental baseline for this Project constitutes the existing physical conditions as they currently exist, which represents the time that the environmental process commenced.

1.9 Environmental Determination

The following table provides the environmental determination of the Project.

Table 1: Environmental Determination

I find that there is no substantial evidence that the project will have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.	☒
I find that although the proposed project could have a significant effect on the environment, revisions to the project or proposals have been made by or agreed to by the project proponent, that will avoid the effects or mitigate the effects to where no significant effects on the environmental will occur. A **MITIGATED NEGATIVE DECLARATION** (**MND**) will be prepared.	☐
I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** (**EIR**) is required.	☐
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **EIR** is required, but it must analyze only the effects that remain to be addressed.	☐
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** (**ND**) pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document.	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the CEQA Guidelines. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project, which are documented in this addendum to the earlier CEQA document (CEQA §15164).	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document (**ND** , **MND** or **EIR**) pursuant to CEQA Guidelines Sections 15162 through 15163.	☐

Kevin Shannon
Signature

August 11, 2022
Date

Kevin Shannon, Consultant - Environmental Planner
Name

Section 2: Project Description

Introduction

This section provides the project background, location and environmental setting, and the characteristics of the Project.

2.1 Project Background

In accordance with State law, the County is required to update its Housing Element every eight years. For each eight-year planning cycle, the County is allocated a specific number of housing units (i.e., Regional Housing Needs Assessment (RHNA) allocation). The RHNA quantifies current and future housing needs within a jurisdiction.

The Housing Element establishes the County's official housing policies and programs to accommodate the County's RHNA allocation goals and identifies available candidate housing sites to meet those goals.

In addition to updating the Housing Element, the Land Use Element requires an amendment to maintain internal consistency with the Housing Element. Similarly, the Safety Element requires an amendment when the Housing Element is amended. An Environmental Justice Element is also required to be created when two or more existing General Plan elements are concurrently revised after January 2018. Last, the Zoning Code requires revisions to the existing Housing Opportunities Overlay to maintain consistency with programs included Housing Element Update.

2.2 Project Location and Environmental Setting

The proposed Project is located within the unincorporated portion of Orange County (refer to Figure 2) and specifically within sites suitable to accommodate the RHNA allocation. The sites may be developed with different land uses consisting of residential, commercial, office, retail, and industrial.

2.3 Project Characteristics

The Project consists of the following five components. Descriptions of each are provided below.

- 6th Cycle Housing Element Update
- Land Use Element Amendment
- Safety Element Amendment
- Environmental Justice Element
- Zoning Code Amendment - Housing Opportunities Overlay District

2.3.1 6th Cycle Housing Element Update

The County of Orange Housing Element establishes policies, procedures, and incentives in its land use planning and development activities that will result in the maintenance and expansion of the housing supply to adequately accommodate households of the current and future population living in the unincorporated County. The Housing Element institutes policies that will guide County decision-making and establishes a Housing Action Plan to implement housing goals through an eight-year planning period. On October 15, 2021, the 5th Cycle (2013-2021) planning period ended and the 6th Cycle (2021-2029) planning period began.

Although certain County housing programs operate within cities, the County's Housing Element primarily addresses housing needs in the unincorporated areas to meet the various income levels. The County's Housing Element makes provisions for affordable and accessible housing for special needs groups in the community and is designed to provide guidance in the maintenance of existing affordable housing. These commitments are an expression of the statewide housing goal of "decent housing and a suitable living environment for every California family."

The Housing Element Update will include the County's Housing Action Plan, which addresses the County's identified housing needs, and includes goals, policies, and programs concerning housing and housing-related services, and the County's approach to addressing its Regional Housing Needs Assessment (RHNA) allocation, its share of the regional housing need. The 6th Cycle (2021-2029) Housing Element Update consists of a comprehensive review and an update to the previous Housing Element, which covered the 5th Cycle (2013-2021) planning period.

To satisfy and meet its RHNA allocation, the County completed a parcel-specific land inventory that includes sites capable of accommodating the RHNA allocation of 10,406 units and is included in the land inventory section of the Housing Element. The County is required to identify areas with adequate zoning to accommodate this future growth, however, it is not required to develop these housing units.

The 6th Cycle Housing Element Update does not grant any land use entitlements or authorize development of a specific project, nor does it consider candidate housing sites not already zoned for residential development or non-residentially zoned sites that allow residential development with the existing Housing Opportunities Overlay.

2.3.2 Land Use Element Amendment

The County of Orange Land Use Element describes objectives, policies, and land use patterns for the unincorporated area. It also establishes development criteria and standards, including population density and building intensity. Land use categories are used to depict the general distribution, location, and extent of public and private uses of land. The update will include the following proposed revisions:

- The "Land Use Categories" section will be revised to reflect current permitted uses allowed by the County's Zoning Code, such as the Housing Opportunities Overlay District regulations, and 6th Cycle Housing Element Update, no new permitted uses will be proposed.
- The "Building Intensity/Population Density Standards" chart (Table III-I) requires an update to reflect current regulations in the County's Zoning Code, no new standards will be proposed.
- The County's land use-related "Objectives and Policies" will be revised to reflect any changes to these that may have been adopted since the previous Land Use Element amendment, no new objectives and policies will be proposed.
- The "Planning Constraints and Deficiencies" section will be revised to ensure internal consistency with the other elements of the County's General Plan including the 6th Cycle Housing Element Update.

2.3.3 Safety Element Amendment

The California Government Code requires general plans to include "a safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to

mudslides and landslides, subsidence and other geologic hazards known to the legislative body; flooding; and wildland and urban fires."

The purpose of the County's Safety Element is to comprehensively inventory hazards which primarily impact persons and property in the unincorporated areas of Orange County. The scope of the Safety Element also allows for a countywide perspective for other safety-related matters. This hazards inventory identifies information necessary for the development of goals, objectives, policies, and implementation programs that will guide and direct local government decision-making in safety-related matters and also foster coordination with regional, state, and federal policies and programs.

An update, or amendment, of the County of Orange Safety Element is required to ensure compliance with California Government Code Section 65302(g)(3). Under this Government Code, upon the next revision to the County's Housing Element, which is currently underway, the Safety Element must be updated to address new statutory considerations regarding the risk of wildland fire in State Responsibility Areas and in Very High Fire Hazard Severity Zones. The update must meet specific requirements including those set forth in the Office of Planning and Research's "Fire Hazard Planning" document and the General Plan Guidelines.

The Safety Element update will: 1) add information regarding existing planned development and agencies responsibilities, 2) revise goals, policies, and objectives that address climate vulnerability and adaptation per Senate Bill 379, 3) revise goals, policies, and objectives as necessary to maintain integrity of essential public facilities, and 4) update the County's hazards inventory. In addition, the Governor's Office of Emergency Services (Cal OES) has established new and specific requirements for incorporation of the County's Hazard Mitigation Plan (HMP) into the Safety Element to maintain the County's eligibility for pre-disaster mitigation funding per Assembly Bill 2140. This will include the addition of a Uniform Resource Locator (URL) pointing readers directly to the County's HMP. The Safety Element update will meet these new Cal OES requirements.

2.3.4 Environmental Justice Element

The County of Orange will add an Environmental Justice Element to the General Plan pursuant to Government Code Section 65302 (h)(1). This statute requires that upon the adoption or next revision of two or more existing elements concurrently on or after January 1, 2018, counties that have disadvantaged communities shall incorporate environmental justice policies into their general plans, either in a separate Environmental Justice element or by integrating related goals, policies, and objectives throughout the other elements. The County is currently in the process of completing its 6th Cycle Housing Element Update and will also be completing an associated amendment to its Land Use Element. These two General Plan amendments trigger the requirement for the County to comply with the statute at this time.

According to the California Environmental Protection Agency (Cal EPA) website, "the aim of Environmental Justice is to lift the unfair burden of pollution from those most vulnerable to its effects." According to the California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen, versions 3.0 and 4.0, several census tracts that include unincorporated areas have been identified as disadvantaged communities.

The objective of the new Environmental Justice Element is to provide for the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to

the implementation of environmental laws, regulations, and policies. The new Environmental Justice Element will include goals, policies, and programs to address environmental justice. This will include ensuring the opportunity for meaningful participation in the public process, minimizing to the extent feasible exposure of residents to pollution in the environment, increasing mobility and accessibility for all residents, and reviewing opportunities for affordable housing from an environmental justice perspective.

2.3.5 Orange County Zoning Code Amendment

The purpose of the Housing Opportunities Overlay District (HOO) Regulations, Zoning Code section 7-9-44, is to increase the number of sites available for the development of affordable housing, emergency shelters, and multi-service centers in the unincorporated area. The HOO was adopted by the Board of Supervisors on January 10, 2006, and amended in 2008 and 2013 to increase the number of eligible sites. The intent of the HOO is to facilitate the development of affordable housing within commercial, industrial, and select high-density zoned sites. The HOO Regulations allow eligible projects to be constructed in commercial, industrial, and certain high-density residential areas. All residential projects developed under the HOO Regulations are eligible to take advantage of the State Density Bonus Law to increase the allowable density on the development site and to receive up to three incentives (waiver of site development standards) that are intended to make the development more economically feasible.

The Housing Opportunities Overlay allow eligible development in the following zoning districts:

- C1 – “Local Business”
- C2 – “General Business”
- CC – “Commercial Community “
- CH – “Commercial Highway “
- R2 – “Multi-Family Dwellings “
- R3 – “Apartment “
- CN – “Commercial Neighborhood “
- PA – “Professional & Administrative Office “
- M1 – “Light Industrial “
- R4 – “Suburban Multi-Family Residential”
- RP – “Residential-Professional “

The HOO Regulations currently applies a base density of 43 units per acre on affordable housing projects located within the commercial and industrial zoning districts of the HOO. These projects may request an increase in density either under the provisions of the County’s Zoning Code or State Density Bonus Law. The intended target population for the affordable housing development will determine the percentage of a density bonus the project is eligible for. Applying the Zoning Code provisions could result in up to a maximum of a 45% density bonus, or 63 units per acre. Applying the State Density Bonus Law could result in up to an 80% increase in density, or 78 units per acre. Affordable housing projects located in high-density residential areas are subject to the base density for that zoning district but would also be eligible for a density bonus.

The proposed revisions to the HOO Regulations would:

- Increase the base density applied to eligible affordable housing projects within commercial and industrial zoning districts from 43 units per acre, up to 70 units per acre.

- Apply the base density of up to 70 units per acre to all eligible affordable housing projects within high-density residential zoning districts, regardless of the maximum density of the underlying district.
- All high-density zoned residential sites located within the City of Costa Mesa Sphere of Influence are specifically excluded.

The increased base density applied to eligible affordable housing projects is intended to facilitate the development of affordable housing, one of the County's goals set forth in its Housing Element.

2.4 Project Approvals

Following the completion of the mandatory public review period, the proposed Housing Element and amendments would be scheduled for a public hearing before the Orange County Planning Commission followed by the Orange County Board of Supervisors. The Planning Commission will review the IS/ND with the proposed amendments and provide a recommendation to the Board of Supervisors. The following table provides the public agency approvals.

Table 2: Public Agency Approvals

Entity	Action
Planning Commission	• Provide Recommendation that the Board of Supervisors Adopt the IS/ND • Provide Recommendation that the Board of Supervisors Approve the Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01
Board of Supervisors	• Adopt IS/ND • Approve Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01
Department of Housing and Community Development	• Determine the Housing Element is substantially compliant with state housing element law
Board of Forestry and Fire Protection	• Review revised Safety Element and provides written comments

Source: OC Public Works, Development Services/Planning, June 2022.

Section 3: Environmental Evaluation

3.1 Aesthetics *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Response to Impact Questions (a - d): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Aesthetics would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Aesthetics.

References

California Department of Transportation (Caltrans). 2018. California Scenic Highway Mapping System – Orange County. Accessed online:
http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm

Orange, County of. General Plan, Scenic Highway Plan. 2005

3.2 Agriculture and Forestry Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51004)g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	☐	☐	☐	☒

Response to Impact Questions (a – e): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Agriculture and Forestry Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Agriculture and Forestry Resources.

References

Orange, County of. General Plan, Resources Element. 2012

Department of Agriculture, U.S. 2012 Census of Agriculture.

3.3 Air Quality *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

Response to Impact Questions (a – e): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Air Quality would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because

there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Air Quality.

References

Orange, County of. Draft Housing Element Update HE 20-01, Draft Safety Element Update SE 19-01, Draft Land Use Element Update LUE 22-01, Draft Environmental Justice Element EJ 22-01, and draft Zoning Code Amendment CA 22-01

South Coast Air Quality Management District. 2016 Air Quality Management Plan (Final). December 2016.

3.4 Biological Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Response to Impact Questions (a – f): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Biological Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Biological Resources.

References

Orange, County of. Natural Community Conservation Plan & Habitat Conservation Plan. July 1996.

3.5 Cultural Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Response to Impact Questions (a - d): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Cultural Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Cultural Resources.

References

Orange, County of. General Plan, Resources Element. 2013

_____. General Plan, Land Use Element. 2015

3.6 Energy *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Energy would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Energy.

References
No references are associated with this topic.

3.7 Geology and Soils *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: ii) Strong seismic ground shaking?	☐	☐	☐	☒
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal system where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Response to Impact Questions (a - e): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Geology and Soils would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Geology and Soils.

References

Orange, County of. General Plan, Safety Element. 2013

_____. General Plan, Land Use Element. 2015

3.8 Greenhouse Gas Emissions *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Greenhouse Gas Emissions would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Greenhouse Gas Emissions.

References

California Air Pollution Control Officers Association.

South Coast Air Quality Management District. Final Draft 2016 Air Quality Management Plan. December 2016.

3.9 Hazards and Hazardous Materials *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Response to Impact Question (a - h): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation updates the County's hazards inventory and integrates the County's Hazard Mitigation Plan into the Safety Element (refer to Section 2.3.3).

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the eight threshold questions specific to Hazards and Hazardous Materials would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Hazards and Hazardous Materials.

References

Orange, County of. General Plan, Land Use Element. 2015

_____. Health Care Agency, Environmental Health Division.

_____. Airport Land Use Commission.

Orange County Fire Authority

3.10 Hydrology and Water Quality *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Would the project [result in] inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Response to Impact Questions (a - j): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the ten threshold questions specific to Hydrology and Water Quality would result

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Hydrology and Water Quality.

References

Orange, County of. General Plan, Public Services and Facilities Element. 2012

_____. General Plan, Land Use Element. 2015

3.11 Land Use and Planning *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Response to Impact Questions (a - c): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation updates the Land Use Element to revise the Land Use Categories list, Table III-I to reflect current regulations in the County Zoning Code, revise Objectives and Policies, and revise the Planning and Deficiencies section (refer to Section 2.3.2) to ensure consistency in all plans and zoning documents.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the three threshold questions specific to Land Use and Planning would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Land Use and Planning.

3.10.3 References

Orange, County of. General Plan, Land Use Element. 2015

3.12 Mineral Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Mineral Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Mineral Resources.

References

Orange, County of. General Plan, Resources Element. 2013

3.13 Noise *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Response to Impact Questions (a - f): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70

units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Noise would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Noise.

References

Orange, County of. General Plan, Noise Element. 2012

3.14 Population and Housing *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Response to Impact Questions (a - c): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact or induced population growth, no impacts related to the three threshold questions specific to Population and Housing would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Population and Housing.

References

Orange, County of. General Plan, Housing Element. 2013

3.15 Public Services *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: i) Fire protection? ii) Police protection? iii) Schools? iv) Parks? v) Other public facilities?	☐	☐	☐	☒
Impact Conclusion: i) Fire protection	☐	☐	☐	☒
Impact Conclusion: ii) Police protection	☐	☐	☐	☒
Impact Conclusion: iii) Schools	☐	☐	☐	☒
Impact Conclusion: iv) Parks	☐	☐	☐	☒
Impact Conclusion: v) Other public facilities	☐	☐	☐	☒

Response to Impact Questions (ai - aiv): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Public Services would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Public Services.

References

Orange, County of. General Plan, Public Services & Facilities Element. 2012

Orange, County of. General Plan, Recreation Element. 2012

3.16 Recreation *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion or recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Recreation would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Recreation.

References

Orange, County of. General Plan, Public Services & Facilities Element. 2012

_____. General Plan, Recreation Element. 2012

3.17 Transportation/Traffic *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities?	☐	☐	☐	☒

Response to Impact Questions (a - f): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to

Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Transportation/Traffic would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Transportation/Traffic.

References

Orange, County of. General Plan, Transportation Element. 2012

3.18 Tribal Cultural Resources *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☐	☒

Response to Impact Questions (a and b): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level

impact, no impacts related to the four threshold questions specific to Aesthetics would result. Refer to Section 1.6 that discusses Tribal consultation.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Tribal Cultural Resources.

References
No references are associated with this topic.

3.19 Utilities and Service Systems *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Response to Impact Questions (a - g): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing

projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the seven threshold questions specific to Utilities and Service Systems would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Utilities and Service Systems.

References

Orange, County of. General Plan, Public Services and Facilities Element. 2012

3.20 Wildfire *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Response to Impact Questions (a - d): The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation merely updates the Safety Element to address new statutory requirements for fire risks in State Responsibility areas and Very High Fire Hazard Severity Zones to meet the requirements of the Office of Planning and Research's Fire Hazard Planning document. (refer to Section 2.3.3).

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or

existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Wildfire would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Wildfire.

References
No references are associated with this topic.

3.21 Mandatory Findings of Significance *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation**	**Less than Significant Impact**	**No Impact**
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	☒
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Response to Impact Question a): Refer to Section 3.4 - Biological Resources and Section 3.5 - Cultural Resources. As discussed in these sections, the proposed Project would have no effect on fish or wildlife habitat or population, plant or animal communities, protected species, or important examples of the major periods of California history or prehistory. Therefore, no impacts would not result from Project implementation.

Response to Impact Question b): There are no impacts resulting from this Project as analyzed in Sections 3.1 through 3.20 in this IS/ND. Therefore, no cumulative impacts would be created and the Project is not cumulatively considerable.

Response to Impact Question c): Sections 3.1 through 3.20 in this IS/ND analyzed potential impacts and did not identify any impacts resulting from Project implementation. Therefore, no significant adverse effects on human beings, either directly or indirectly, have been identified and no impacts would result.

Mitigation Measures: No mitigation measures are either required or necessary.

Impact Conclusion: All potential impacts were evaluated and determined to result in no impacts.

Section 4: List of Preparers

The table below provides the list of individuals who participated in the preparation of this IS/ND.

Table 3: List of Preparers

Preparer	Role
Justin Kirk, Planning Manager OC Public Works, Development Services/Planning	Project Director
Cindy Salazar, Land Use Manager - Advance Planning OC Public Works, Development Services/Planning	Program Manager
Ruby Maldonado, Senior Contract Planner OC Public Works, Development Services/Planning	Project Manager
Yuritzy Randle, Associate Planner OC Public Works, Development Services/Planning	Research
Kevin Shannon, Consultant - Environmental Planner OC Public Works, Development Services/Planning	Environmental Analysis
Kimley-Horn & Associates, Inc.	Housing Consultant

Source: OC Public Works, Development Services/Planning, June 2022.

Addendum No. 1 to the Initial Study/Negative Declaration No. IP 22-0133
for
Housing-Related Amendments to the County of Orange General Plan and Comprehensive Zoning Code

Prepared for:

County of Orange Planning Commission
and
Board of Supervisors
601 North Ross Street
Santa Ana, CA 92701

Prepared by:

OC Public Works/OC Development Services/Planning
601 North Ross Street
Santa Ana, CA 92701

May 2024

Table of Contents

Chapter 1: Introduction 2
1.1 Project Title 2
1.2 Lead Agency Name | Address 2
1.3 Lead Agency Contact Person | Telephone Number | Email 2
1.4 Project Location 2
1.5 Environmental Documentation 2
Chapter 2: Environmental Determination 6
Chapter 3: Project Changes 7
3.1 Introduction 7
3.2 Proposed Project 7
3.3 Environmental Setting and Surrounding Land Uses 7
Chapter 4: Environmental Evaluation 9
4.1 Analysis Methodology 9
4.2 Evaluation 9
4.2.1 Aesthetics 10
4.2.2 Agriculture and Forestry Resources 11
4.2.3 Air Quality 12
4.2.4 Biological Resources 13
4.2.5 Cultural Resources 14
4.2.6 Energy 15
4.2.7 Geology and Soils 15
4.2.8 Greenhouse Gas Emissions 16
4.2.9 Hazards and Hazardous Materials 17
4.2.10 Hydrology and Water Quality 19
4.2.11 Land Use and Planning 21
4.2.12 Mineral Resources 22
4.2.13 Noise 22
4.2.14 Population and Housing 23
4.2.15 Public Services 24
4.2.16 Recreation 25
4.2.17 Transportation 26
4.2.18 Tribal Cultural Resources 27
4.2.19 Utilities and Service Systems 28
4.2.20 Wildfire 29
4.2.21 Mandatory Findings of Significance 31
Chapter 5: Conclusion 32

List of Figures

Figure 1: Regional Location 4
Figure 2: Orange County Unincorporated Areas 5

List of Tables

Table 1: Environmental Determination 6

Chapter 1: Introduction

The purpose of this Addendum is to document minor changes to the Initial Study/Negative Declaration (IS/ND) No. IP 22-0133 for the Housing-Related Updates to the County of Orange General Plan and Comprehensive Zoning Code Project (Project) adopted in September 2022.

1.1 Project Title

Housing-Related Amendments to the County of Orange General Plan and Comprehensive Zoning Code

1.2 Lead Agency Name | Address

County of Orange
OC Public Works, Development Services/Planning
601 North Ross Street
Santa Ana, California 92701

1.3 Lead Agency Contact Person | Telephone Number | Email

Cindy Salazar, Planning Division Manager
OC Development Services/Planning
Telephone: 714.667.8870
Cindy.Salazar@ocpw.ocgov.com

1.4 Project Location

The Project location is the unincorporated portion of Orange County. Orange County is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles. Refer to Figure 1 – Regional Location and Figure 2 – Orange County Unincorporated Areas.

1.5 Environmental Documentation

Pursuant to Section 15164 of the CEQA Guidelines, an addendum to an adopted Negative Declaration may be prepared if "only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent environmental impact report or negative declaration have occurred."

The project considered in the prior environmental document IS/ND No. IP 22-0133 (IS/ND No. IP 22-0133) examined implementing a policy framework necessary to meet housing needs by accommodating the County's RHNA allocation of 10,406 units through housing-related amendments to the County of Orange General Plan (GP) Elements and Comprehensive Zoning Code (ZC). IS/ND No. IP 22-0133 analyzed the expansion of the Housing Opportunities Overlay, which included a maximum development density of up to 70 dwelling units per acre (du/ac) for eligible affordable housing projects located in commercial, industrial, and multifamily residential base districts. The current proposed Project would rezone residential professional (RP) and commercial zoning districts[1] to a new Mixed-Use (MX) zone and would

[1] The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in this Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

rezone Two-Family Residential (R2D) zones to either the Multifamily Dwellings (R2) or Suburban Multifamily Dwellings (R4) zones depending on where the R2D is located. In addition, the proposed Project would update the multifamily residential development standards to require a minimum base density of 30 du/ac.

This Addendum evaluates the proposed changes to the zoning districts and the requirement of a minimum base density specific to multifamily residential zoned properties. The update to the base density is less than the 70 du/ac maximum density for the Housing Opportunities Overlay studied in IS/ND No. IP 22-0133. In addition, multifamily zoning districts currently allow a 43 du/ac maximum density, which is considered the baseline existing condition for analysis of the new minimum required density. The proposed changes to the GP and ZC fall within the scope of the resource impacts as analyzed in the previously prepared environmental document.

None of the conditions described in Sections 15162 have been met. The proposed changes to the housing-related portions of the County of Orange GP and Comprehensive ZC will not significantly impact any resources as described in adopted IS/ND No. IP 22-0133. The proposed changes are consistent with the original intent of the amendments described in and analysis of IS/ND No. IP 22-0133. Therefore, preparation of an Addendum to adopted IS/ND No. IP 22-0133 is appropriate to satisfy the requirements of CEQA.

Figure 1: Regional Location

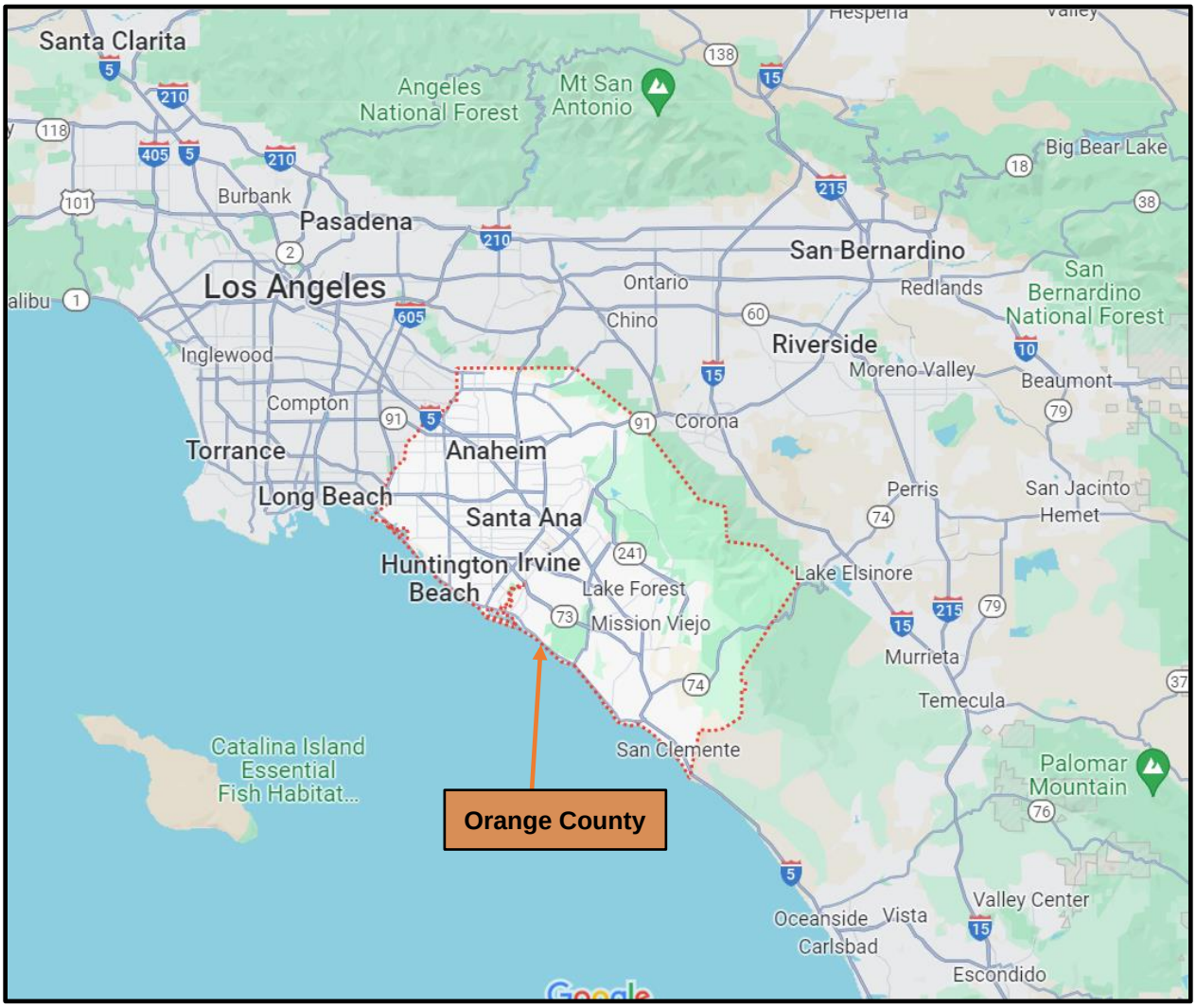
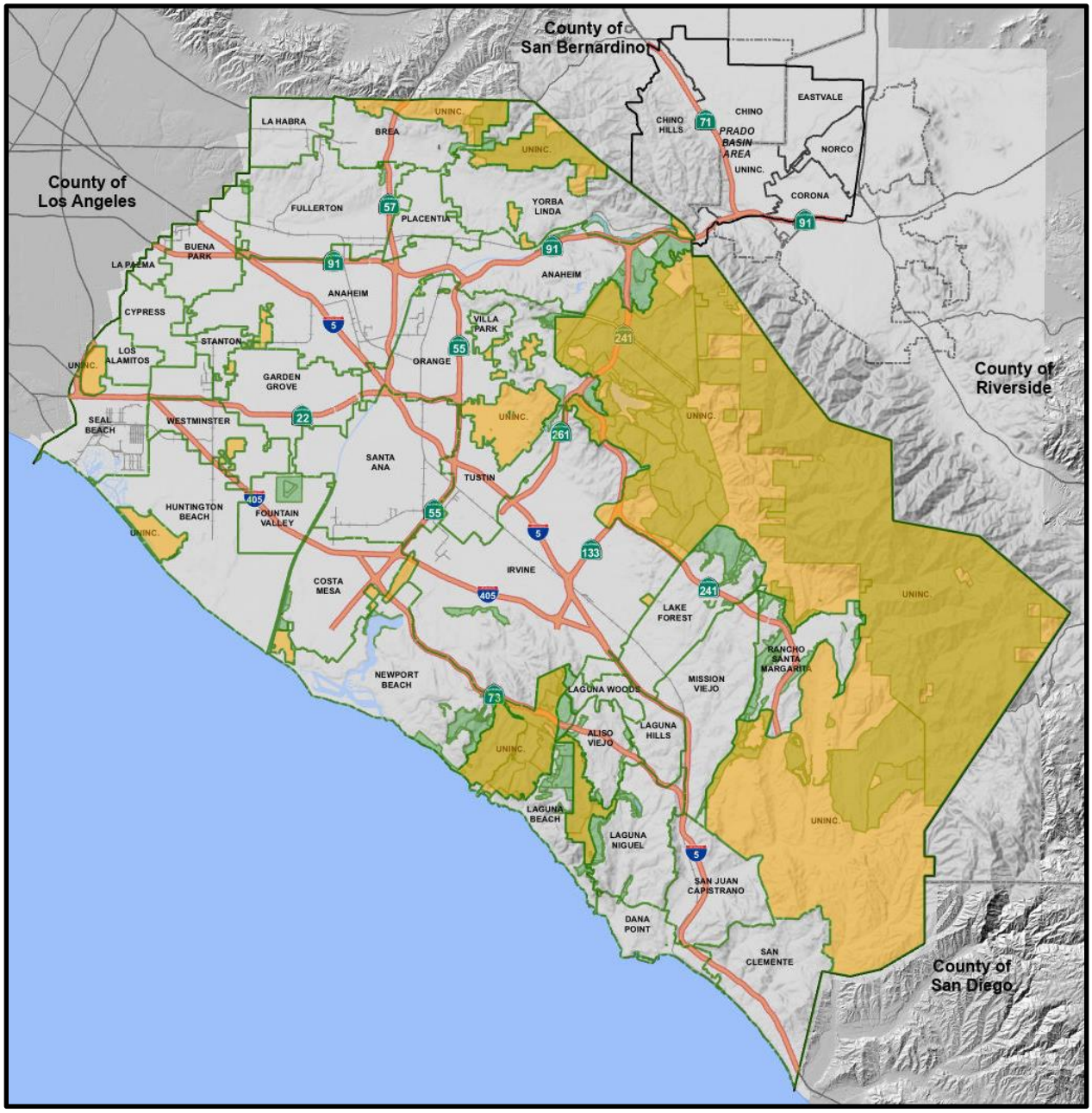


Figure 2: Orange County Unincorporated Areas



Chapter 2: Environmental Determination

Based on the analysis conducted in this Addendum, the County of Orange, OC Public Works, Development Services/Planning, as the Lead Agency, has made the following determination:

Table 1: Environmental Determination

I find that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.	☐
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.	☐
I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.	☐
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.	☐
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document adopted/certified pursuant to the State CEQA Guidelines and the County's adopted Local CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document	☐
I find that the potential environmental impacts associated with the proposed project have previously been analyzed as part of an earlier CEQA document adopted/certified pursuant to CEQA. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project, which are documented in this addendum to the earlier CEQA document (CEQA §15164) (IS/ND No. IP 22-0133 was adopted by the Orange County Board of Supervisors on September 27, 2022).	☒
I find that the proposed project Has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document (ND or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.	☐



Signature

April 29, 2024
Date

Virginia Gomez
Printed Name

Chapter 3: Project Changes

3.1 Introduction

Initial Study/Negative Declaration (IS/ND) No. IP 22-0133 (IS/ND No. IP 22-0133) evaluated the impacts of certain County actions, including a Zoning Code (ZC) Amendment to increase the existing base density maximum from 43 dwelling units per acre (du/ac) to 70 du/ac for eligible affordable housing projects located in the Housing Opportunities Overlay zones in commercial, industrial, and multifamily residential districts. The County used IS/ND No. IP 22-0133 to support the ZC Amendment, along with actions to update: (1) the County's Housing Element for the 6th Cycle (2021-2029); (2) the Land Use Element; and (3) the Safety Element; and (4) preparation of an Environmental Justice Element. These actions covered by IS/ND No. IP 22-0133 supported the County's completion of the 6th Cycle Housing Element, including satisfying the County's Regional Housing Needs Assessment (RHNA) allocation of 10,406 units.

IS/ND No. IP 22-0133 evaluated the increase of the base density for eligible projects within the Housing Opportunities Overlay and associated General Plan (GP) and ZC amendments and concluded that Project implementation would result in no direct or indirect impacts to the environment as demonstrated in the evaluation of each resource category. The Orange County Board of Supervisors adopted IS/ND No. IP 22-0133 for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC on September 27, 2022. However, since the adoption of IS/ND No. IP 22-0133, changes in State Law and in the County's ability to meet its RHNA allocation have resulted in required updates to the County's ZC and GP to ensure these policy documents remain consistent with the law.

3.2 Proposed Project

This Addendum evaluates updates to the County GP and Comprehensive ZC needed to conform to State law. To satisfy and meet its RHNA allocation in a manner consistent with State law, the County will rezone residential professional (RP) and commercial zoning districts[2] to a new Mixed-Use (MX) zone and would rezone the Two-Family Residential (R2D) zone to the Multifamily Dwellings (R2) or Suburban Multifamily Dwellings (R4) zones (proposed Project). In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. The MX zone is proposed to apply to the same zoning districts as the existing Housing Opportunities Overlay.

This Addendum evaluates the proposed changes to zoning districts and to the minimum base density specific to multifamily residential zoned properties. The update to the minimum base density is less than the 70 du/ac maximum density for the Housing Opportunities Overlay studied in IS/ND No. IP 22-0133. Multifamily zoning districts currently allow a 43 du/ac maximum, which is considered the baseline existing condition for analysis of the new minimum required density in the existing zoning districts and the new MX Zoning District. Therefore, the proposed zone changes and revised development standards fall within the Project evaluated in IS/ND No. IP 22-0133, which was intended to increase the number of available sites for the development of affordable housing.

3.3 Environmental Setting and Surrounding Land Uses

The proposed Project is located within the unincorporated portion of Orange County (refer to Figure 2) and specifically within sites suitable to accommodate portions of the County's RHNA allocation. The sites

[2] The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

are presently developed with different land uses consisting of residential, commercial, office, retail, and industrial uses and are non-vacant. Each of the multifamily zoned areas are currently zoned for development at a density of up to 43 du/ac, and all multifamily or commercial zoned areas are currently subject to the Housing Opportunities Overlay, which allows individual properties the option of utilizing a higher maximum development density of 70 du/ac if the proposed development includes affordable housing. Additionally, these areas are subject to existing development standards that require a Site Development Permit for developments that include five (5) units or more. This requirement to obtain a Site Development Permit for developments with five (5) units or more would not change as part of the proposed Project. With the existing Housing Opportunities Overlay in place, the locations affected by the proposed Project currently allow multifamily housing developments (both affordable and market-rate), like those that would be permissible as part of the proposed Project.

Chapter 4: Environmental Evaluation

4.1 Analysis Methodology

The analysis in this section is based on the Initial Study/ Negative Declaration prepared for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project (IS/ND No. IP 22-0133) and identifies the changes that would be necessary (if any) to reflect the new MX zone and establishment of a minimum base density.

The purpose of this Addendum is to compare the proposed zoning and development standard changes to the project analyzed in IS/ND No. IP 22-0133, and to determine if the scope and analysis of IS/ND No. IP 22-0133 adequately analyzes the potential impacts of these changes or if any of the conditions described in Section 15162 of the State CEQA Guidelines are present.

Conditions described in CEQA Guidelines Section 15162 that would trigger the need to prepare an Subsequent EIR, an Supplemental EIR, or other environmental documentation to evaluate project impacts include: (1) changes to the project that require major revisions of the previous environmental documentation due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; (2) substantial changes with respect to the circumstances under which the project is undertaken that require major revisions of the previous environmental documentation due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; or (3) the availability of new information of substantial importance relating to significant effects or mitigation measures or alternatives that was not known and could not have been known when the environmental documentation was certified as complete.

IS/ND No. IP 22-0133 is incorporated by reference into this Addendum, consistent with CEQA Guidelines Section 15150.

4.2 Evaluation

IS/ND No. IP 22-0133 concluded that all potential direct or indirect impacts from updating the Housing Opportunities Overlay, which included an increase of maximum density from 43 to 70 dwelling units per acre (du/ac) for eligible projects, were evaluated and determined to result in no impacts. As noted in IS/ND No. IP 22-0133, the project that was considered implements a policy framework necessary to meet housing needs to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts[3] to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. In addition, prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a site development permit process for

[3] The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

housing developments with five (5) units or more. The proposed Project would introduce a new minimum density of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone.

The County is legally obligated to identify suitable sites but not required to propose development as part of the Housing Element update. Project implementation merely increases potential development density. The proposed updates do not grant any land use entitlements, authorize development of any specific development project, or require any direct physical changes to land or existing development. Planning review with OC Development Services/Planning would still be required for any new development proposed that includes five (5) units or more, even if that development is consistent with the amended GP Elements and Comprehensive ZC. Per the existing ZC, multifamily development projects of five (5) or more dwelling units are permitted subject to a Site Development Permit and reviewed by the Director of OC Development Services/Planning. This requirement would not change as part of the proposed Project. Therefore, the rezone of RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones are consistent with IS/ND No. IP 22-0133. Analysis of the environmental factors potentially affected by this Project is provided below.

4.2.1 Aesthetics

a. Have a substantial adverse effect on a scenic vista?

Consistent with Section 3.1 (Aesthetics) of adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of an actual proposed development against the development standards, including building heights and setback requirements for the purposes of protecting the scenic vistas. Therefore, the proposed Project would not cause additional direct or indirect impacts to scenic vistas that were not previously analyzed in IS/ND No. IP 22-0133.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to scenic resources within state scenic highways that were not previously analyzed in IS/ND No. IP 22-0133.

c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to the existing visual character in nonurbanized and urbanized areas and would not conflict with the existing zoning or regulations that were previously analyzed in IS/ND No. IP 22-0133.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to daytime and nighttime views due to light and glare that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.2 Agriculture and Forestry Resources

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any agricultural zones or prime farmland. The proposed Project would not cause additional direct or indirect impacts related to farmland that were not previously analyzed in IS/ND No. IP 22-0133.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any agricultural zones or parcels with Williamson Act contracts. The proposed Project would not cause additional direct or indirect impacts related to zoning for agricultural use that were not previously analyzed in IS/ND No. IP 22-0133.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any forest land, timberland, or timberland zoned for Timberland Production. The proposed Project would not cause additional direct or indirect impacts related to forest land or timberland that were not previously analyzed in IS/ND No. IP 22-0133.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

See response to c) above. The proposed Project would not cause additional direct or indirect impacts related to forest land that were not previously analyzed in IS/ND No. IP 22-0133.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply

to or affect any agricultural zones or prime farmland and does not convert any designated forest land to a non-forest use. The proposed Project would not cause additional direct or indirect impacts related to Agriculture and Forestry Resources that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.3 Air Quality

a. Conflict with or obstruct implementation of the applicable air quality plan?

Consistent with Section 3.3 (Air Quality) of adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework designed to meet the housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated and used for residential development and commercial development that allows housing. The parcels for which the existing zones are changing to MX, R2 or R4, or for which the minimum du/ac standards are being set, are already non-vacant developed sites. The MX zoning designation will allow both commercial and residential development consistent with the existing use of the identified parcels. The sites' existing and proposed zone designations already assume emissions generated by the nature of the land use and will continue to be consistent with existing air quality plans as the proposed Project does not include redevelopment of the affected parcels. Emissions in these zones are anticipated to be from vehicles such as trucks and passenger vehicles. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not conflict with and would not cause additional direct or indirect impacts related to implementation of applicable air quality plans or standards that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

See response to a) above. Given that the proposed Project does not include any proposed development, and instead consists of a policy framework designed to meet housing needs requirements for unincorporated Orange County, the proposed Project would not violate any air quality standard or contribute substantially to an existing or air quality violation.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

See response to a) above. The proposed Project would not generate new emissions beyond the existing uses and would not cause additional direct or indirect impacts related to increases in any criteria pollutants that were not previously analyzed in the IS/ND No. IP 22-0133.

d. Expose sensitive receptors to substantial pollutant concentrations?

See response to a) above. The proposed Project would not generate new emissions beyond the existing uses and would not cause additional direct or indirect impacts related to pollutant concentrations especially near sensitive receptors that were not previously analyzed in the IS/ND No. IP 22-0133.

e. Create objectionable odors affecting a substantial number of people?

See response to a) above. The proposed Project would not generate new emissions and would not cause additional direct or indirect impacts related an increase in objectionable odors that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.4 Biological Resources

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Consistent with Section 3.4 (Biological Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed and urbanized areas and does not affect natural open spaces, existing habitat, or wildlife corridors, and does not conflict with existing local policies for the protection of biological resources. The proposed Project is a policy framework to guide future development. Any future housing development of five (5) units or more in the multifamily residential or MX zones will require a Site Development Permit, a discretionary approval necessitating environmental review of the proposed development, including evaluation of impacts to biological resources. No actual development of the affected properties is authorized by the proposed Project. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts related to habitat modifications, on any species identified as a candidate, sensitive, or special status species that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to any riparian habitat or other sensitive natural community identified that were not previously analyzed in the IS/ND No. IP 22-0133.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to federally protected wetlands that were not previously analyzed in the IS/ND No. IP 22-0133.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to the movement of any species or with established native wildlife corridors or impede the use of native wildlife nursery sites that were not previously analyzed in the IS/ND No. IP 22-0133.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to local policies or ordinances for the protection of biological resources that were not previously analyzed in the IS/ND No. IP 22-0133.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

See response to e) above. The proposed Project would not cause additional direct or indirect impacts related to adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.5 Cultural Resources

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Consistent with Section 3.5 (Cultural Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to already developed and urbanized areas and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed. Any future housing development of five (5) units or more in the multifamily residential or MX zones will require a Site Development Permit that requires evaluation of impacts to environmental resources, including to archaeological, cultural, historical, and paleontological resources. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the significance of a historical resource as defined in § 15064.5 that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the significance of an archaeological resource pursuant to § 15064.5 that were not previously analyzed in IS/ND No. IP 22-0133.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

See response to a) above. Therefore, the proposed Project would not cause any direct or indirect impacts to a unique paleontological resource or site or unique geologic feature that were not previously analyzed in IS/ND No. IP 22-0133.

d. Disturb any human remains, including those interred outside of formal cemeteries?

See response to a) above. In addition, at the time of any future development, Health and Safety Code Section 7050.5 will apply and will require that a project follow the statutory protocol in the event human remains are found during construction. Therefore, the proposed Project would not cause additional direct or indirect impacts any human remains that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.6 Energy

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Consistent with Section 3.6 (Energy) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all separately proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects parcels that already consume energy based on the nature of the land use – existing residential and commercial uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project would not generate new unnecessary consumption of energy resources beyond the anticipated or existing uses on the parcels affected. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wasteful, inefficient, or unnecessary consumption of energy resources that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

See response to a) above. Therefore, the proposed Project would not cause any additional direct or indirect conflicts with or impacts to a state or local plan for renewable or energy efficiency that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.7 Geology and Soils

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
    ii. Strong seismic ground shaking?
    iii. Seismic-related ground failure, including liquefaction?
    iv. Landslides?

Consistent with Section 3.7 (Geology and Soils) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all separately proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed

development against development standards. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Should a future specific development be proposed, a project-specific soils and geotechnical report may be required to disclose any impacts. Therefore, the proposed updates to the GP and ZC do not propose development and would not cause additional direct or indirect impacts related to the earthquakes, liquefaction, landslides, soil erosion, and expansive soil that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Result in substantial soil erosion or the loss of topsoil?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to soil erosion or the loss of topsoil that were not previously analyzed in IS/ND No. IP 22-0133.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to soil stability, landslides, lateral spreading, subsidence, liquefaction, or collapse that were not previously analyzed in IS/ND No. IP-22-0133.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to expansive soils that were not previously analyzed in IS/ND No. IP 22-0133.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of wastewater?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the ability of soils to support the use of septic tanks or alternative wastewater disposal systems that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.8 Greenhouse Gas Emissions

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?

Consistent with Section 3.8 (Greenhouse Gas Emissions [GHG]) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated and used for residential development and commercial development that allows housing. The parcels for which the existing zones are changing to MX, R2 or R4, or for which the minimum du/ac standards are being set, are already non-vacant developed sites. The MX zoning designation will allow both commercial and residential development consistent with the existing use of the identified parcels. The sites' existing and proposed

zone designations already assume GHG emissions generated by the nature of the existing land use and will continue to be consistent with existing air quality plans. GHG emissions in these zones are anticipated to be from vehicles such as trucks and passenger vehicles that support the existing uses. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not generate new GHG emissions beyond the anticipated uses and would not cause additional direct or indirect impacts related to Greenhouse Gas Emissions and applicable plans that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

See response a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to compliance with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs which were not previously analyzed in IS/ND No. IP 22-0133.

4.2.9 Hazards and Hazardous Materials

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC do not propose development and would not cause additional direct or indirect impacts related to transporting or disposing of hazardous materials that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

See response to a) above. Therefore, the proposed Project would not cause any additional impacts related to hazardous materials that were not previously analyzed in IS/ND No. IP 22-0133.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas consisting of non-vacant lots, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Should a specific development be proposed in the future, a project-specific Phase I/Phase II Environmental Site

Assessment would be required to disclose any impacts and mitigation for any such impacts would be required. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to hazardous emissions or materials near schools that were not previously analyzed in the IS/ND No. IP 22-0133.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

See response to c) above. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to hazardous materials sites that were not previously analyzed in the IS/ND No. IP 22-0133.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are not located within an airport land use plan. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to airport land use plans that were not previously analyzed in the IS/ND No. IP 22-0133.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

See response to e) above. The proposed Project is not within the vicinity of a private airstrip and therefore would not cause additional direct or indirect impacts related to safety hazards caused by proximity to private airstrips that were not previously analyzed in IS/ND No. IP 22-0133.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized non-vacant sites that are consistent with all existing applicable emergency response plans. The proposed Project does not propose development that would not alter any existing emergency response plans. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC would not cause additional direct or indirect impacts related to emergency response or evacuation plans that were not previously analyzed in the IS/ND No. IP 22-0133.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire. Therefore, the proposed updates to the GP and ZC would not cause additional direct or indirect impacts related to wildland fires that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.10 Hydrology and Water Quality

a. Violate any water quality standards or waste discharge requirements?

Consistent with Section 3.10 (Hydrology and Water Quality) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all future proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects parcels that already assume water use and consumption generated by the nature of the existing and ongoing land uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. In addition, future construction activities associated with new housing development is subject to the National Pollutant Discharge Elimination System requirements and County Code requirements for drainage, discharge, and best management practices. Therefore, the proposed Project would not generate new unnecessary consumption of water resources or hydrology concerns and would not cause additional direct or indirect impacts related to Hydrology and Water Quality that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to depletion of groundwater supplies and groundwater recharge that were not previously analyzed in IS/ND No. IP 22-0133.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to drainage patterns, stream or river courses, erosion or siltation that were not previously analyzed in IS/ND No. IP 22-0133.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to drainage patterns, stream or river courses, surface runoff or flooding that were not previously analyzed in IS/ND No. IP 22-0133.

e. Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related storm water drainage systems and polluted runoff that were not previously analyzed in IS/ND No. IP 22-0133.

f. Otherwise substantially degrade water quality?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to water quality that were not previously analyzed in IS/ND No. IP 22-0133.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Consistent with Section 3.10 (Hydrology and Water Quality) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas with no flood risk, reduced flood risks due to levees, or designated as areas with one percent annual chance of floods. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. As such, the proposed Project would not cause additional direct or indirect impacts regarding the placement of housing along a 100-year flood hazard area that were not previously analyzed in the IS/ND No. IP 22-0133.

h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to placement of structures within a 100-year flood hazard area that were not previously analyzed in IS/ND No. IP 22-0133.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to risk of flooding that were not previously analyzed in IS/ND No. IP 22-0133.

j. Would the project [result in] inundation by seiche, tsunami, or mudflow?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to inundation by seiche, tsunami, or mudflow that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.11 Land Use and Planning

a. Physically divide an established community?

Consistent with Section 3.11 (Land Use and Planning) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would establish a minimum base density for multifamily residential development at 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation and the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts or physically divide established communities that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

See response to a) above. The proposed Project would incorporate changes into the County's Land Use Element, ZC, and GP; therefore, the proposed Project would not result in any additional direct or indirect impacts related to applicable land use plans, policies, or regulations that were not previously analyzed in IS/ND No. IP 22-0133.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

See response to a) above. The proposed Project applies to non-vacant sites that are already developed with existing uses. The proposed Project would continue to authorize uses of these non-vacant parcels consistent with the existing uses and does not propose any new development. Therefore, the proposed Project would not result in any additional direct or indirect impacts related to habitat conservation plans or natural community conservation plans that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.12 Mineral Resources

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Consistent with Section 3.12 (Mineral Resources) of the adopted IS/ND No. IP 22-0133, the proposed Project does not affect areas designated for mineral resources. The proposed Project applies to urbanized areas that are currently zoned for residential and commercial uses, and the updates establish a MX zone and development standards consistent with existing zoning designations. Therefore, the proposed Project would not cause additional direct or indirect impacts related to locally important mineral resources or result in a loss of those resources that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

See response to a) above. Therefore, because the proposed Project does not propose development and does not affect any locally important mineral resource recovery sites, it would not result in any additional direct or indirect impacts to a locally important mineral resource recovery site that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.13 Noise

a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Consistent with Section 3.13 (Noise) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects existing parcels with established multifamily and commercial uses that already have typical noise and groundborne vibration generated by the nature of those land uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The noise levels in proposed Project areas are anticipated to be from general residential and commercial activities, consistent with the existing uses. The MX zone designation will allow both commercial and residential development consistent with the existing uses. Therefore, the proposed Project would not increase ambient noise beyond the anticipated uses and would not cause additional direct or indirect impacts related to noise levels in excess of existing standards that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

See response to a) above. Therefore, the proposed Project would not result in additional direct or indirect impacts related to groundborne vibration or groundborne noise levels that were not previously analyzed in IS/ND No. IP 22-0133.

c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

See response to a) above. Therefore, because the proposed Project does not propose any development, it would not result in any additional direct or indirect impacts related to permanent increases in ambient noise levels that were not previously analyzed in IS/ND No. IP 22-0133.

d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

See response to a) above. Therefore, because the proposed Project does not propose any development, it would not result in any additional direct or indirect impacts related to temporary or periodic increases in ambient noise levels that were not previously analyzed in IS/ND No. IP 22-0133.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Consistent with Section 3.13 (Noise) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are not located within an airport land use plan. There is no development proposed. The proposed Project affects existing parcels with established multifamily and commercial uses that already have typical noise generated by the nature of the land use and proximity to airports. Therefore, the proposed Project would not expose people to excessive noise beyond the existing uses and would not cause additional direct or indirect impacts related to excessive noise levels due to proximity to public airports that were not previously analyzed in the IS/ND No. IP 22-0133.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

See response to e) above. The proposed Project does not affect parcels in the vicinity of a private airstrip; therefore, the proposed Project would not result in additional direct or indirect impacts related to excessive noise levels due to proximity to a private airstrip that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.14 Population and Housing

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Consistent with Section 3.14 (Population and Housing) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are

consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project applies to urbanized areas that are already designated for residential and commercial uses and anticipate population growth through the provision of housing. The proposed Project would not cause additional direct or indirect impacts related to inducing population growth that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

See response to a) above. The proposed Project does not propose development; therefore, the proposed Project would not result in any additional direct or indirect impacts related to displacement of housing that were not previously analyzed in IS/ND No. IP 22-0133.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

See response to a) above. The proposed Project does not propose development; therefore, the proposed Project would not result in any additional direct or indirect impacts related to displacement of persons that were not previously analyzed in IS/ND No. IP 22-0133.

4.2.15 Public Services

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    i. Fire protection?
    ii. Police protection?
    iii. Schools?
    iv. Parks?
    v. Other public facilities?

Consistent with Section 3.15 (Public Services) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive

ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project applies to a developed and urbanized areas where fire and police protection services, schools, parks, and other public facilities are already provided, and are consistent with the level of anticipated public service needs in the GP. Therefore, the proposed Project would not cause additional direct or indirect impacts related to Public Services that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.16 Recreation

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Consistent with Section 3.16 (Recreation) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas that have existing recreational and public facilities. The proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The Project does not affect or require expansion of existing recreational or public facilities as the existing zones and GP anticipated housing development in the areas affected by the proposed Project and planned

existing recreational facilities to address that demand. The proposed Project would not cause additional direct or indirect impacts related to increasing the use of existing neighborhood and regional parks or other recreational facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to requiring the construction or expansion of recreational facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.17 Transportation

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project affects parcels that are already designated for residential and commercial development that allows housing. The Project updates apply to developed, urbanized areas with traffic generated by the existing residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the non-vacant parcels affected by the proposed Project. In addition, there is no development included in the proposed Project. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. All proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of the future proposed development against development standards. Therefore, the proposed Project would not generate new transportation demands or traffic beyond the existing uses, in part, because the GP anticipated public circulation and transit needs associated with the existing uses. Therefore, the proposed Project would not cause additional direct or indirect impacts related to applicable plans, ordinances, and policies establishing measures of effectiveness for the performance of the circulation system that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

See response to a) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated transportation needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to congestion management that were not previously analyzed in IS/ND No. IP 22-0133.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

See response to a) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated transportation needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to air traffic patterns that were not previously analyzed in IS/ND No. IP 22-0133.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects urbanized parcels that are non-vacant and designated for residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the affected parcels and provide emergency access. In addition, there is no development proposed with the updates to the GP and ZC. Therefore, the proposed Project would not cause additional direct or indirect impacts related to hazards due to design features that were not previously analyzed in the IS/ND No. IP 22-0133.

e. Result in inadequate emergency access?

See response to d) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated emergency access needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to emergency access that were not previously analyzed in IS/ND No. IP 22-0133.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects urbanized parcels that are non-vacant and designated for residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the affected parcels. The proposed Project does not conflict with policies and regulations for these systems, services and facilities. Therefore, the proposed Project would not cause additional direct or indirect impacts related to policies and regulations regarding public active transportation facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.18 Tribal Cultural Resources

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?
    ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public

Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Consistent with Section 3.18 (Tribal Cultural Resources) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed with the updates to the GP and ZC. Any future housing development of five (5) units or more in the multifamily residential, or MX zones will continue to require a Site Development Permit, necessitating environmental impacts evaluation including impacts to tribal cultural resources. In addition, at the time of any future development, the Health and Safety Code Section 7050.5 will apply and will require that a project follow the protocol when human remains are found on a construction site. Therefore, the proposed Project would not cause additional direct or indirect impacts to Tribal Cultural Resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resource, or a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.19 Utilities and Service Systems

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated for residential and commercial development that allows housing. There is no development proposed with the updates to the GP and ZC, and no new construction of wastewater, storm water or water facilities. Any future housing development of five (5) units or more in the multifamily residential, or MX zones will require a Site Development Permit necessitating environmental impacts evaluation including impacts to wastewater treatment facilities. The County is legally obligated to identify sites but not required to propose development. County ministerial and discretionary processes also require any future proposed development to coordinate with Utility and Service Providers to confirm sufficient capacity of to serve the proposed development. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wastewater treatment facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the construction of new or expansion of existing water or wastewater treatment facilities that were not previously analyzed in IS/ND No. IP 22-0133.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the construction of new or expansion of existing storm water drainage facilities that were not previously analyzed in IS/ND No. IP 22-0133.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the sufficiency of water supplies that were not previously analyzed in IS/ND No. IP 22-0133.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the capacity of wastewater treatment providers that were not previously analyzed in IS/ND No. IP 22-0133.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed with the updates to the GP and ZC, and therefore no new or expanded demand on landfill services. Therefore, the proposed Project would not cause additional direct or indirect impacts related to landfill capacity that were not previously analyzed in the IS/ND No. IP 22-0133

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. The County is legally obligated to identify sites but not required to propose development. The proposed Project does not conflict with policies and regulations for solid waste facilities. Therefore, the proposed Project would not cause additional direct or indirect impacts related to policies and regulations regarding solid waste that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.20 Wildfire

a. Substantially impair an adopted emergency response plan or emergency evacuation plan.

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to developed, urbanized areas that provide fire protection services and have Building and Safety Code requirements for the proper development of public and private structures and facilities. The proposed

updates to the GP and ZC do not disrupt any emergency evacuation plans and do not create additional fire risks, because the proposed Project does not include development. The proposed Project includes updates to the Safety Element to ensure consistency and safety provisions for the proposed rezone of the RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones. There is no development proposed with the updates to the GP and ZC. The County is legally obligated to identify sites but not required to propose development. In addition, the proposed Project area does not include parcels that are located in identified Fire Hazard Severity Zones. Any future proposed development in Fire Hazard Severity Zones will continue to follow the County's policies, regulations, discretionary and ministerial processes for safety and fire prevention. Therefore, the proposed Project would not cause additional direct or indirect impacts related to emergency response plans or emergency evacuation plans that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire. The proposed Project includes updates to the Safety Element to ensure consistency and safety provisions for the proposed rezones. There is no development proposed with the updates to the GP and ZC and therefore, the proposed Project will not expose occupants to pollutant concentrations from a wildfire. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wildfire, expose occupants to pollutant concentrations, or exacerbate fire risk that were not previously analyzed in the IS/ND No. IP 22-0133.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

See response to b) above. The proposed Project does not propose development; therefore, the proposed Project would not cause any additional direct or indirect impacts related to infrastructure that may exacerbate fire risk that were not previously analyzed in IS/ND No. IP 22-0133.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire, and includes only areas with no flood risk, reduced flood risks due to levees, or designated as areas with one percent annual chance of floods. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. As such, the proposed Project would not cause additional direct or indirect impacts related to wildfire or flooding that were not previously analyzed in the IS/ND No. IP 22-0133.

4.2.21 Mandatory Findings of Significance

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Consistent with Section 3.21 (Mandatory Findings of Significance) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed urbanized areas that are designated residential and commercial zones. The Project is a policy framework meant to address housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated for residential and commercial development, and which allow and authorize housing development. There is no development proposed as part of the updates to the GP and ZC. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density.

Response to Impact Question a): Refer to Section 4.2.4 – Biological Resources, Section 4.2.5 - Cultural Resources, and 4.2.18 – Tribal Cultural Resources. As discussed in these sections, the proposed Project would have no effect on fish or wildlife habitats or populations, plant or animal communities, protected species, or important examples of the major periods of California history or prehistory. Therefore, no impacts would not result from Project implementation that were not previously analyzed in the IS/ND No. IP 22-0133.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Response to Impact Question b): There are no impacts resulting from this Project as analyzed in Sections 4.2.1 through 4.2.20 in this Addendum. Therefore, no cumulative impacts would occur, and the Project is not cumulatively considerable in a way not previously analyzed in the IS/ND No. IP 22-0133.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Response to Impact Question c): Sections 4.2.1 through 4.2.20 in this Addendum analyzed potential impacts and did not identify any impacts resulting from Project implementation. Therefore, no significant adverse effects on human beings, either directly or indirectly, have been identified and no impacts would result that were not previously analyzed in the IS/ND No. IP 22-0133.

Chapter 5: Conclusion

The proposed Project will support the County's 6th Cycle Housing Element Update and efforts to meet its housing needs requirements that were analyzed in the previously approved Initial Study/Negative Declaration (IS/ND) for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project (IP No. 22-0133). This Addendum documents minor changes to IS/ND No. IP 22-0133 for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project, which includes a rezone of RP and commercial zoning districts[4] to a new MX zone and rezoning of the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the base zoning designation or the Housing Opportunities Overlay.

IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone.

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed updates do not grant any land use entitlements, authorize development of any specific development project, or require any direct physical changes to land or existing development.

As noted above, these changes from the project studied in IS/ND IP No. 22-0133 do not result in any changes to any of the resource area conclusions in IS/ND IP No. 22-0133. The proposed Project rezones and establishes a minimum density in certain already developed parcels within unincorporated areas of Orange County. At some point in the future if theses parcels are redeveloped, they could have the potential to increase the number of dwelling units. However, at this time, meaningful environmental review cannot be conducted because there is no certainty that redevelopment will occur or to what degree any given parcel will be redeveloped. Planning review with OC Development Services/Planning would still be required for any new development proposed that includes five (5) units or more, even if that development is consistent with the amended GP Elements and Comprehensive ZC. Per the existing ZC, multifamily development projects of five (5) or more dwelling units are permitted subject to a Site Development Permit with a corresponding CEQA review and are reviewed by the Director of OC Development Services/Planning. This requirement would not change as part of the proposed Project. Therefore, the rezone of RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones are consistent with IS/ND No. IP 22-0133.

[4] The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

It was previously determined that there would be no impacts to any environmental resource area as demonstrated in IS/ND IP No. 22-0133. The updates proposed in this Addendum to the amendments would not result in any additional impacts not discussed and analyzed in IS/ND IP No. 22-0133. Based on the foregoing analysis and information, none of the conditions identified in California Environmental Quality Act Guidelines Section 15162 exist that would trigger the need to prepare another environmental documentation to evaluate project impacts or mitigation measures with regard to the proposed Project. Thus, the Addendum is the appropriate mechanism to update the analysis included in IS/ND IP No. 22-0133.

RECEIVED
2024 DEC -4 PM 4:34
CLERK OF THE BOARD
COUNTY OF ORANGE
BOARD OF SUPERVISORS

MEMORANDUM

To: Robin Stieler, Clerk of the Board

From: Chairman Donald P. Wagner, Third District

Date: December 4, 2024

RE: Item for December 17, 2024 Board of Supervisors Meeting

S31A

Please place a supplemental item on the December 17, 2024 Board of Supervisors meeting agenda for these revised 2024 Chairman's appointments to committees.

2024 CHAIR APPOINTMENTS
(Term of appointments are 1/1/24 - 12/31/24 unless otherwise noted)

COMMITTEE NAME	POSITION/COMMENTS	2024 CURRENT APPOINTMENTS	2024 PROPOSED APPOINTMENTS
California State Association of Counties (CSAC) (Quarterly meetings; day/time varies)	Regular Member Alternate Member	Chaffee Sarmiento	Chaffee Sarmiento
CalOptima (Monthly; first Thursday at 2:00 P.M.)	Regular Member Regular Member Alternate Member	Sarmiento Chaffee Wagner	Sarmiento Chaffee Wagner
Children & Families Commission of Orange County (First 5 Orange County) (Bi-monthly as needed; first Wednesday at 9:00 A.M.)	Regular Member Alternate Member Nominations for Category 1 (Education) appointments* Nominations for Category 2 (Health) appointments* *The chair appoints 2 Supervisors to these slots as defined by Ord. Sec. 1-2-335 after the Regular Member is determined. These two appointments are not members of the commission, their sole duty is to make nominations to the BOS in April of each year for upcoming commission vacant slots	Chaffee Foley *TBD *TBD	Chaffee Foley *TBD *TBD
Coastal Greenbelt Authority (Bi-monthly; second Wednesday at 3:00 P.M.)	Regular Member (May be a BOS Member or other County official)	Foley	Foley
Commission to End Homelessness (Bi-monthly; third Wednesday at 1:00 P.M.)	Regular Member (1/23/24 - 1/22/26) Regular Member (1/26/23 - 1/25/25)* *Provided for information only, this multi-year appointment expires 2025	Wagner Sarmiento	Wagner Sarmiento
Law Library Board of Trustees (Monthly; third Tuesday at 12:15 P.M.)	Regular Member #1 (May be BOS member or OC resident) Regular Member #2 (Must be a member of California State Bar)	Sherry L. Leyson Sarmiento	Sherry L. Leyson Sarmiento

2024 CHAIR APPOINTMENTS
(Term of appointments are 1/1/24 - 12/31/24 unless otherwise noted)

COMMITTEE NAME	POSITION/COMMENTS	2024 CURRENT APPOINTMENTS	2024 PROPOSED APPOINTMENTS
Local Agency Formation Commission (LAFCO) (Monthly; second Wednesday at 8:15 A.M.)	Regular Member - (7/1/22 - 6/30/26)* Regular Member (1/24/23 - 6/30/27)* Alternate Member (7/1/23 - 6/30/27)* *Provided for information only, these multi-year appointments expire in 2026 or 2027	Wagner Vacant Vacant	Wagner Vacant Vacant
National Association of Counties (NACO) (Biennially; March and July)	Regular Member Alternate Member	Chaffee Sarmiento	Chaffee Sarmiento
Newport Bay Watershed Executive Committee (Central (Newport Bay) Watershed Management Area) (Biennially; March and September)	Regular Member Alternate Member	Foley Wagner	Foley Wagner
OC Public Libraries Advisory Board (Three times per year)	Regular Member Regular Member (Members represent library branches located in unincorporated areas)	Wagner Chaffee	Wagner Chaffee
One Water, One Watershed (As needed)	Regular Member (Completing current term 3/2/21 - 3/1/25)* *Provided for information only, this multi-year appointment expires 2025	Sarmiento	Sarmiento
Orange County Audit Oversight Committee (Quarterly Meetings; day/time varies)	Regular Member (BOS Chair) Regular Member (BOS Vice Chair)	Wagner Chaffee	Wagner Chaffee
Orange County Behavioral Health Advisory Board (Monthly; Second Weds. 10:00 A.M.; Fourth Weds. at 10:00 A.M.)	Regular Member	Sarmiento	Sarmiento

2024 CHAIR APPOINTMENTS
(Term of appointments are 1/1/24 - 12/31/24 unless otherwise noted)

COMMITTEE NAME	POSITION/COMMENTS	2024 CURRENT APPOINTMENTS	2024 PROPOSED APPOINTMENTS
Orange County Community Corrections Partnership (OCCCP) (Quarterly; fourth Thursday at 2:00 P.M.)	Regular Member (Traditionally same as BOS Regular Member on OCCJCC) Alternate Member (Traditionally same as BOS Alternate Member on OCCJCC)	Chaffee Foley	Chaffee Foley
Orange County Criminal Justice Coordinating Council (OCCJCC) (Monthly; third Friday at 9:00 A.M.)	Regular Member (Traditionally same as BOS Regular Member on OCCCP) Alternate Member (Traditionally same as BOS Alternate Member on OCCCP)	Chaffee Foley	Chaffee Foley
Orange County Emergency Management Council (Quarterly; Second Wednesday/1:30 P.M.)	Regular Member Alternate Member #1 Alternate Member #2 Alternate Member #3 Alternate Member #4	Chaffee Foley Sarmiento Wagner Vacant	Chaffee Foley Sarmiento Wagner Nguyen
Orange County Fire Authority (OCFA) (Monthly; fourth Thursday at 6:00 P.M.)	Regular Member Regular Member (Note: If these appointments change, a resolution for OCFA will be included with the ASR)	Wagner Foley	Wagner Foley
Orange County Housing Finance Trust (OCHFT) (Bi-Monthly; Third Wednesday at 10:00 A.M.)	Regular Member (1/23/24 -1/22/26) Regular Member (1/25/23 - 1/24/25)* Countywide Elected Official (1/23/24 - 1/22/26) Countywide Elected Official (1/23/24 - 1/22/26) *Provided for information only, this multi-year appointment expires in 2025	Sarmiento Foley Andrew Hamilton Shari Freidenrich	Sarmiento Foley Andrew Hamilton Shari Freidenrich
Orange County Juvenile Justice Coordinating Council (OCJJCC) (Quarterly, fourth Thursday at 3:30 P.M.)	Regular Member Alternate Member	Foley Wagner	Foley Wagner
Orange County Local Remote Access Network (RAN) (As needed)	Regular Member Alternate Member (May be a BOS Member or staff representative)	Sarmiento Wagner	Sarmiento Wagner

2024 CHAIR APPOINTMENTS
(Term of appointments are 1/1/24 - 12/31/24 unless otherwise noted)

COMMITTEE NAME	POSITION/COMMENTS	2024 CURRENT APPOINTMENTS	2024 PROPOSED APPOINTMENTS
Orange County Mosquito and Vector Control District (Monthly; third Thursday at 3:00 P.M.)	Regular Member (1/2/23 - 1/6/25)* (May be BOS member or Designee) *Terms end first Monday in January, Provided for information only, this multi-year appointment expires in 2025	CEO Designee Lisa Fernandez	CEO Designee Lisa Fernandez
Orange County Operational Area Executive Board (Quarterly; Second Wednesday/1:30 P.M.)	Regular Member Alternate Member	Chaffee Sarmiento	Chaffee Sarmiento
Orange County Parks Foundation Annual; third Friday in July at 10:00 A.M.)	County Director (May be a BOS Member or other)	Chaffee	Chaffee
Orange County Sanitation District (Monthly; fourth Wednesday at 6:00 P.M.)	Regular Member Alternate Member	Chaffee Wagner	Chaffee Wagner
Orange County Transportation Authority (OCTA) (Bi-monthly; second and fourth Monday at 9:00 A.M.)	Regular Member (1st District BOS Member) Regular Member (2nd District BOS Member) Regular Member (3rd District BOS Member) Regular Member (4th District BOS Member) Regular Member (5th District BOS Member)	Vacant Sarmiento Wagner Chaffee Foley	Nguyen Sarmiento Wagner Chaffee Foley
Santa Ana River Flood Control Protection Agency (Seven per year; days vary; 4:00 P.M.)	BOS Representative OC Flood Control District Representative Alternate BOS Representative (May be BOS or staff designee) Alternate OCFCD Representative (May be BOS or staff designee)	Sarmiento Wagner Foley James Tyler	Sarmiento Wagner Foley James Tyler
South Coast Air Quality Management District (AQMD) (Monthly; first Friday at 9:00 A.M.)	Regular Member	Wagner	Wagner

2024 CHAIR APPOINTMENTS
(Term of appointments are 1/1/24 - 12/31/24 unless otherwise noted)

COMMITTEE NAME	POSITION/COMMENTS	2024 CURRENT APPOINTMENTS	2024 PROPOSED APPOINTMENTS
South Orange County Watershed Management Area Executive Committee (Three times per year)	Regular Member Alternate Member	Foley Wagner	Foley Wagner
Southern California Association of Governments (SCAG) - General Assembly and Regional Council General Assembly meets annually in May Regional Council meets monthly (first Thursday at 12:15 P.M.)	General Assembly and Regional Councilmember Alternate Representative (to General Assembly only) Note: The alternate is for the General Assembly only; per SCAG bylaws the Regional Council does not allow alternates or votes by proxy. Term on the General Assembly is indefinite provided member and alternate remain elected officials of the appointing body. Term on the Regional Council is for two years, however there is no term limit in the bylaws, so the official representative may be reappointed provided they remain an elected official of the appointing body. Historically, Orange County has treated this as an annual appointment by the Chairman of the BOS and as such appointments may change on an annual basis	Wagner Foley	Wagner Foley
Southern California Home Financing Authority (SCHFA) (4-5 times per year)	Regular Member (BOS Chair) CEO or Designee Member	Wagner Michelle Aguirre	Wagner Michelle Aguirre
Transportation Corridor Agency - Foothill/Eastern (Monthly; second Thursday at 9:30 A.M.)	Regular Member (3rd District BOS Member) Regular Member (4th District BOS Member) Regular Member (5th District BOS Member)	Wagner Chaffee Foley	Wagner Chaffee Foley
Transportation Corridor Agency - San Joaquin Hills (Monthly; second Thursday at 9:30 A.M.)	Regular Member (3rd District BOS Member) Regular Member (5th District BOS Member)	Wagner Foley	Wagner Foley
Urban Counties Caucus (Monthly; first Wednesday at 4:00 P.M.)	Regular Member Alternate Member	Chaffee Sarmiento	Chaffee Sarmiento

County Executive Office

Memorandum

RECEIVED
2024 DEC 12 PM 2:05
CLERK OF THE BOARD
COUNTY OF ORANGE
BOARD OF SUPERVISORS

December 11, 2024

To: Clerk of the Board of Supervisors

From: Michelle Aguirre, Acting County Executive Officer

Digitally signed by Michelle Aguirre
DN: cn=Michelle Aguirre, email=michelle.aguirre@ocgov.com, c=US
Date: 2024.12.12 10:26:44 -08'00'

Subject: Exception to Rule 21

S31B

The County Executive Office is requesting a Supplemental Agenda Staff Report for the December 17, 2024, Board Hearing.

Agency: County Executive Office
Subject: Social Services Agency Second Amendment to Lease at 2125 E. Katella, Anaheim
Districts: 2

Explanation: The second amendment was executed by lessor after the Clerk of the Board's filing deadline therefore this Agenda Staff Report could not be submitted by the filing deadline.

Justification: CEO Real Estate is requesting this item be filed for the 12/17/2024, Board meeting in order to avoid incuring holdover fees. The existing lease agreement is set to expire on 12/31/2024. The County can continue in occupancy of the premises while the amendment is finalized. This Agenda Staff Report and attachments were finalized after the filing deadline to the Clerk of the Board.

Concur:

Donald P. Wagner, Chairman of the Board of Supervisors

cc: Board of Supervisors
County Executive Office
County Counsel

Docusign Envelope ID: AD2E9EBB-8497-4D5C-AF1B-B44AFB9FE204

Agenda Item *Clerk's Use Only* S31B

SUPPLEMENTAL AGENDA ITEM
AGENDA STAFF REPORT

RECEIVED
2024 DEC 12 PM 2:05
CLERK OF THE BOARD
COUNTY OF ORANGE
BOARD OF SUPERVISORS

MEETING DATE:	12/27/24
LEGAL ENTITY TAKING ACTION:	Board of Supervisors
BOARD OF SUPERVISORS DISTRICT(S):	2
SUBMITTING AGENCY/DEPARTMENT:	County Executive Office
DEPARTMENT HEAD REVIEW:	Signed by: Thomas A. Miller — *Department Head Signature*
DEPARTMENT CONTACT PERSON(S):	Thomas A. Miller (714) 834-6019 An Tran (714) 975-1542

SUBJECT: Social Services Agency Second Amendment to Lease at 2125 E. Katella, Anaheim

CEO CONCUR	COUNTY COUNSEL REVIEW	CLERK OF THE BOARD
Digitally signed by Michelle Aguirre DN: cn=Michelle Aguirre, email=michelle.aguirre@ocgov.com, c=US Date: 2024.12.12 10:25:42 -08'00'	Approved to Form	Discussion
CEO Signature	*Action* DocuSigned by: Lauren Kramer — *County Counsel Signature*	3 Votes Board Majority

Budgeted: Yes
Current Year Cost: See Financial Impact Section
Annual Cost: See Financial Impact Section

Staffing Impact: No
# of Positions:
Sole Source: N/A
Current Fiscal Year Revenue: N/A
Funding Source: See Financial Impact Section
County Audit in last 3 years No
Levine Act Review Completed: Yes
Prior Board Action: 6/17/2014 #69

RECOMMENDED ACTION(S)

1.	Find the project is categorically exempt from the California Environmental Quality Act (CEQA), Class 1 (Existing Facilities) pursuant to CEQA Guidelines, Section 15301.
2.	Approve and execute the Second Amendment to lease agreement with KB Stadium Crossings MT, LLC, a Delaware limited liability company, for 53,674 square feet of office space located at 2125 E. Katella, Anaheim, California, to extend the term for 39 months, commencing on January 1, 2025, through March 31, 2028.
3.	Authorize the Chief Real Estate Officer or designee to execute subsequent documents, option terms and amendments that make non-monetary and/or monetary changes that do not increase County costs by more than $75,000 per year, as approved by County Counsel.

Docusign Envelope ID: AD2E9EBB-8497-4D5C-AF1B-B44AFB9FE204

SUMMARY:

Approval of the Second Amendment to lease agreement with KB Stadium Crossings MT, LLC will allow Social Services Agency's continued use of 53,674 square feet of office space, located at 2125 E. Katella Avenue in Anaheim, for an additional 39 months to conduct call center operations, known as the Orange's Call and Processing Center.

BACKGROUND INFORMATION:

On June 17, 2014, the Board of Supervisors (Board) approved a 10-year lease (Original Lease) with 2125 East Katella Avenue Holdings, LLC (Original Lessor), commenced on January 1, 2015, for 53,674 rentable square feet (RSF) of office space, on the first and fourth floors of the building located at 2125 E. Katella Avenue in Anaheim (Premises), for use by the Social Services Agency (SSA) for its call center operations, known as Orange's Call and Processing Center (OCPC). On December 11, 2017, the Original Lessor sold the Premises to Stadium Crossings JV Holdings LLC, a Delaware limited liability company, who subsequently sold to Property Owner B LLC, a Delaware limited liability company (Owner B). On March 14, 2022, KB Stadium Crossings, DST, a Delaware statutory trust, acquired and assumed all of the interests of Owner B in the Original Lease and assigned the Original Lease to KB Stadium Crossings MT, LLC (Current Lessor). Subsequently, a First Amendment to the Lease was executed on June 22, 2022, to reflect the change in ownership structure. The term of the Lease is set to expire on December 31, 2024.

CEO Real Estate negotiated a lease extension for 39 months, commencing on January 1, 2025, through March 31, 2028 (Proposed Second Amendment). Under the terms of the Proposed Second Amendment, the starting rental rate will be $2.70 per RSF (Rent) and will increase annually at a fixed three percent. For the first six months of the extension term the Rent will be abated at a rate of fifty percent (Rent Abatement). The Rent Abatement results in an average rental rate of $2.58 per RSF during the extension term (a reduced rental rate from the existing rent), which will generate County savings of $447,933. The Proposed Second Amendment will continue as a full-service gross lease, with no additional pass-throughs for the building operating expenses. Lessor will provide, at its own cost and expense, all repair, maintenance and janitorial supplies and services to the Premises, including repair and replacement of the heating, ventilation and air conditioning system, as necessary, and shall be responsible for all utility charges, except telephone. The Proposed Second Amendment updates the county-requested alternations clause to the current standard for services and improvements.

CEO Real Estate brings the Proposed Second Amendment to the Board with less than 30 days prior to the commencement date due to delays in execution of the agreement. The Preference Policy for submittal is at least 30 days prior to the commencement of the contract, agreement or amendment. The County continues to occupy the Premises and may continue in holdover while the Proposed Second Amendment is finalized, at the rate of 105% of the rent paid immediately prior to the expiration of the term, under the same conditions and terms contained in the Lease, as needed.

SSA desires continued occupancy for the OCPC at the Premises to conduct call center operations that are consistent with SSA's program goals. The Proposed Second Amendment allows flexibility for future program needs and therefore approval is recommended by SSA and CEO Real Estate.

Compliance with CEQA: The proposed project is Categorically Exempt (Class 1) from the provisions of CEQA pursuant to CEQA Guidelines Section 15301, because it involves leasing of an existing office facility involving negligible or no expansion of an existing use.

Docusign Envelope ID: AD2E9EBB-8497-4D5C-AF1B-B44AFB9FE204

General Plan: The Lease and uses thereunder were previously found to conform to the General Plan of the City of Anaheim.

FINANCIAL IMPACT:

Appropriations for this Proposed Second Amendment are included in SSA's Budget Control 063 FY 2024-25 Budget and will be included in the budgeting process for future years. The below table of the fiscal year cost is based upon a January 1, 2025, commencement date.

FY 2024-25	$724,599
FY 2025-26	$1,615,856
FY 2026-27	$1,664,331
FY 2027-28*	$1,397,546

*Denotes 9 months of term within this fiscal year

This Proposed Second Amendment is funded by Federal 83%, State 15%, and General funds 2%.

Federal and State dollars are comprised of Medi-Cal and CalFresh program allocation funding.

STAFFING IMPACT:

N/A

REVIEWING AGENCIES:

Social Services Agency

ATTACHMENT(S):

Attachment A – Second Amendment
Attachment B – Acquisition Questionnaire
Attachment C – Lease Summary

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

CEO/ALS/SSA-13-048
Social Services Agency/Call Center
2125 E. Katella Avenue, 1st and 4th Floors,
Anaheim, CA 92806

SECOND AMENDMENT TO LEASE

THIS SECOND AMENDMENT TO LEASE (hereinafter referred to as "**Second Amendment**") is made _____ 2024 ("**Effective Date**"), by and between KB STADIUM CROSSINGS MT, LLC, a Delaware limited liability company (hereinafter referred to as "**Lessor**"), and the COUNTY OF ORANGE, a political subdivision of the State of California, (hereinafter referred to as "**County**"). The Lessor and County may individually be referred to herein as a "**Party**," or together as the "**Parties**." Original Lease, First Amendment and this Second Amendment may hereinafter be referred collectively as the "**Lease**."

RECITALS

I. On June 17, 2014, County and 2125 East Katella Avenue Holdings, LLC, a Delaware limited liability company ("**Original Lessor**"), entered into a lease whereby the County leases from Original Lessor approximately 53,674 rentable square feet of office space ("**Premises**") located at 2125 E. Katella Avenue, in the City of Anaheim, CA 92806 ("**Original Lease**").

II. On December 11, 2017, the Original Lessor sold the Building to Stadium Crossings JV Holdings LLC, a Delaware limited liability company, as evidenced by that certain Grant Deed, recorded in the Official Records of Orange County, California, Instrument No. 2017000530365, attached hereto as Exhibit 1 to this Second Amendment. On December 11, 2017, Stadium Crossings JV Holdings LLC, a Delaware limited liability company sold the Building to Property Owner B LLC, a Delaware limited liability company ("**Owner B**"), as evidenced by that certain Grant Deed, recorded in the Official Records of Orange County, California, Instrument No. 2017000530371, attached hereto as Exhibit 2 to this Second Amendment.

III. As of March 14, 2022, KB Stadium Crossings, DST, a Delaware statutory trust ("**DST**"), acquired all of the interests of Owner B, as evidenced by that certain Grant Deed, recorded in the Official Records of Orange County, California, Instrument No. 2022000100239, attached hereto as Exhibit 3 to this Second Amendment.

IV. As of March 14, 2022, DST assumed all of the interest of Owner B in the Original Lease, as evidenced by that certain Assignment of Leases, dated March 14, 2022, and entered into by and between DST and Owner B, attached hereto as Exhibit 4 to this Second Amendment.

V. As of March 14, 2022, DST assigned to Lessor, and Lessor assumed from DST, all of DST's interest in the Original Lease, as evidenced by that certain Master Lease Agreement,

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

dated March 14, 2022 (the "**Master Lease**"), and entered into by and between DST and Lessor.

VI. The Parties now agree to amend the Lease to extend the Term and to reflect the correct ownership structure of Lessor.

NOW THEREFORE, in consideration of the Recitals above and Exhibits 1-4, which are attached hereto and incorporated herein by this reference, the Parties do hereby agree to amend the Lease as of the Effective Date first written above as follows:

A. Clause 4 (TERM) is hereby deleted from the Lease in its entirety and the following clause is substituted:

"**4. TERM (2.2N)**

The Term of this Lease commenced on January 1, 2015 ("**Commencement Date**") and shall continue in effect and expire on March 31, 2028."

B. Clause 5 (OPTION TO EXTEND TERM) is hereby deleted from the Lease in its entirety.

C. Clause 7 (RENT) is hereby deleted from the Lease in its entirety and the following clause is substituted:

"**7. RENT (3.2N)**

The County agrees to pay to Lessor monthly rent for the Premises pursuant to the Rent Adjustment schedule outlined in Clause 8 (RENT ADJUSTMENT) as stated below.

To obtain rent payments and payment of any amounts hereunder Lessor shall submit to County's Social Services Agency/Facilities Service Manager, in a form acceptable to said Social Services Agency/Facilities Service Manager, a written claim for said rent payments.

Payment shall be due and payable within twenty (20) days after the later of the following:

A. The first day of the month following the month earned; or

B. Receipt of Lessor's written claim by the Social Services Agency/Facilities Service Manager.

Should the Lease expire or terminate on a day that is not the end of the month, Lessor shall be entitled to pro rata rent for the period of occupancy and the amount of space occupied based a thirty (30) day calendar month period.

County shall pay Additional Rent in accordance with this Clause. "**Additional Rent**" consists of charges for additional parking spaces pursuant to Clause 3 (PARKING), after move-in tenant requested improvements and Additional Services pursuant to Clause 12 (COUNTY-REQUESTED ALTERATIONS), and after-hour air conditioning charges pursuant to Clause 15 (UTILITITES)."

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

D. Clause 8 (RENT ADJUSTMENT) is hereby deleted from the Lease in its entirety and the following clause is substituted:

"**8. RENT ADJUSTMENT (3.3N)**

The monthly rent payable by County for the Premises ("**Rent**") shall be automatically adjusted as follows:

Period	Rent	Per Square Foot
1/1/2025 – 2/28/2025	$72,459.90	$1.35
3/1/2025 – 12/31/2025	$144,919.80	$2.70
1/1/2026 – 2/28/2026	$74,633.70	$1.39
3/1/2026 – 12/31/2026	$149,267.39	$2.78
1/1/2027 – 2/28/2027	$76,872.71	$1.43
3/1/2027 – 12/31/2027	$153,745.42	$2.86
1/1/2028 – 3/31/2028	$158,357.78	$2.95

The monthly Rent, above, is the amount to be paid by County. The "Per Square Foot" rate, above, is an estimate for statistical purposes only and for no other purpose."

E. Clause 12 (COUNTY REQUESTED ALTERATIONS) is hereby deleted from the Lease in its entirety and the following clause is substituted:

"**12. COUNTY-REQUESTED ALTERATIONS OR ADDITIONAL SERVICES (4.4 S)**

County through the Social Services Agency/Facilities Service Manager, may, during the Term of the Lease, request Lessor to make improvements, changes or provide Additional Services to the Premises ("**County-Requested Alterations**"). "**Additional Services**" are defined as any services and/or supplies requested by County to be provided by Lessor that are in addition to and outside the scope of the Services completed by Lessor as such are defined in Clause 14 (REPAIR, MAINTENANCE, AND JANITORIAL SERVICES).

The granting or condition of any such request shall be in Lessor's sole and absolute discretion, and Lessor shall have absolutely no liability for failing to approve, or for conditioning, any such request. In connection with Lessor's approval of any County-Requested Alterations, all plans and working drawings for such County-Requested Alterations, as well as the final work, shall be subject to the written approval of Lessor and the Social Services Agency/Facilities Service Manager.

Any County-Requested Alterations being constructed by, or under the direction of Lessor, shall be constructed in substantial compliance with County approved plans and to the extent applicable, in

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

compliance with Federal, California, city and local laws, including but not limited to, the requirement of California Public Contract Code Section 22000, et seq., and shall require, to the extent applicable, its contractor or subcontractors to pay not less than the general prevailing rate of per diem wages for work of a similar character in the locality of the County and not less than the general prevailing rate of per diem wages for holiday and overtime work, as provided in Clause 24 (LABOR CODE COMPLIANCE) of this Lease. Lessor shall, to the extent applicable, publicly advertise for bids for such improvements, as provided in Orange County Codified Ordinances 1-8-1 et seq. and shall provide County a list of all bids received for the contract.

All such County-Requested Alterations and any Additional Services requested by County shall be made by Lessor, at Lessor's sole cost, and reimbursed in a lump sum as Additional Rent by County upon receipt by County from Lessor of a written claim for such reimbursement. County agrees that said reimbursement may include a five percent (5%) management/construction fee which shall be considered as part of the costs and expenses of the County-Requested Alterations or Additional Services."

F. Clause 29 (COMMISSION) is hereby deleted from the Lease in its entirety and the following clause is substituted:

"**29. COMMISSION (6.11 S)**

With the exception of Newmark, which represents Lessor, and Jones Lang LaSalle, which represents the County (together, the "**Brokers**"), each of Lessor and County represents and warrants to the other that it has not had any dealings with any realtors, brokers, finders, or agents in connection with the negotiation of this Second Amendment. Lessor shall pay the commission of the Brokers in accordance with Lessor's separate written agreement with the Brokers."

G. Clause 32 (NOTICES) is hereby deleted from the Lease in its entirety and the following clause is substituted:

"**32. NOTICES (8.1 S)**

All written notices pursuant to this Lease shall be addressed as set forth below or as either Party may hereafter designate by written notice and shall be deemed received upon personal delivery, delivery by facsimile machine, electronic mail, or seventy-two (72) hours after deposit in the United States Mail.

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

To: Lessor

KB Stadium Crossings MT, LLC
c/o KB Exchange Properties, LLC
1645 Village Center Circle, Suite 200
Las Vegas, NV 89134
Attention: Real Estate Department

To: County

County of Orange
Social Services Agency
500 N. State College Boulevard, 6th Floor
Orange, CA 92868
Attn: Director, Administrative Services

With a copy to:

County of Orange, CEO Real Estate
400 West Civic Center Drive, 5th Floor
Santa Ana, CA 92701
Attention: Chief Real Estate Officer"

H. Clause 34 is hereby added to the Lease in its entirety:

"**34. COUNTERPARTS (N)**

This Amendment may be executed in one or more counterparts, each of which will be deemed an original signature but all of which together will constitute one and the same instrument."

I. Clause 35 is hereby added to the Lease in its entirety:

"**35. MASTER LEASE AGREEMENT (N)**

Lessor represents and warrants to County that (a) as of the Effective Date hereof, the Master Lease is in full force and effect, and that neither DST nor Lessor are in breach or default under the Master Lease, nor has any event occurred, which, with the passage of time or the giving of notice, or both, would constitute a breach of default by Lessor or DST under the Master Lease, and (b) following the expiration or earlier termination of the Master Lease, the Master Lease requires that DST automatically assume all of Lessor's duties and obligations under the Lease, as amended hereby. Lessor shall indemnify and hold County harmless from and against all losses, costs, damages and claims arising out of or in connection with Lessor's breach of this Clause 35."

J. Wherever a conflict in the terms or conditions of this Second Amendment and/or First Amendment and/or the Lease exists, the terms or conditions in the Second Amendment shall prevail. In all other respects, the terms and conditions of the Lease and First Amendment, not specifically changed by this Second Amendment, shall remain in full force and effect.

K. The Parties agree that the First Amendment is hereby corrected and amended by this Second Amendment (a) to provide that "Lessor" shall mean and refer only to KB STADIUM CROSSINGS MT, LLC, a Delaware limited liability company, and (b) to remove any reference to the Master Lease being attached as an exhibit to the First Amendment.

IN WITNESS WHEREOF, the Parties have executed this Second Amendment as follows:

APPROVED AS TO FORM:

OFFICE OF THE COUNTY COUNSEL
ORANGE COUNTY, CALIFORNIA

DocuSigned by:
By: Lauren Kramer
5CE9F49926D24E3...

By: Lauren Kramer
Deputy County Counsel

LESSOR

KB STADIUM CROSSINGS MT, LLC, a Delaware limited liability company

DocuSigned by:
By: Jeffrey A. Pori
BE5BA3A37E70467...
Name: Jeffrey A. Pori
Its: Authorized Officer

RECOMMENDED FOR APPROVAL:

SOCIAL SERVICES AGENCY

Signed by:
By: Veronica Rodriguez
EC62D9999F744B5...
Director of Administration

COUNTY EXECUTIVE OFFICE

Signed by:
By: Steven K. Miller
C8ABE26CE6FF49E...
Real Estate Manager

*** Pursuant to the requirements of California Corporations Code section 313, one of the following two methods must be used by a corporation when it enters into a contract with the County: Two people must sign the document. One of them must be the chairman of the board, the president or any vice president. The other must be the secretary, any assistant secretary, the chief financial officer or any assistant treasurer. One corporate officer may sign the document, providing that written evidence of the officer's authority to bind the corporation with only his or her signature must be provided. This evidence would ideally be a corporate resolution.

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

SIGNED AND CERTIFIED THAT A COPY OF THIS DOCUMENT HAS BEEN DELIVERED TO THE CHAIR OF THE BOARD PER GC § 25103, RESO. 79-1535

Attest:

COUNTY

COUNTY OF ORANGE

ROBIN STIELER
Clerk of the Board of Supervisors
of Orange County, California

Chairman of the Board of Supervisors
Orange County, California

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXHIBIT 1

Grant Deed, recorded in the Official Records of Orange County, California, Instrument No. 2017000530365

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

Attachment A

Recorded in Official Records, Orange County
Hugh Nguyen, Clerk-Recorder

30.00

* $ R 0 0 0 9 7 5 3 9 9 7 $ *

2017000530365 8:00 am 12/11/17

90 405 G02 9 01

25300.00 25300.00 0.00 0.00 24.00 0.00 0.00 0.00

After Recording Return To:
First American Title Insurance Company
National Commercial Services
401 E. Pratt Street, Suite 323
Baltimore, Maryland 21202
Attn: Thomas R. Barth

Mail Tax Statements To:
Stadium Crossings JV Holdings LLC
c/o Pendulum Property Partners, LLC
5 Park Plaza, Suite 370
Irvine, California 92614
Attn: Kevin Hayes

GRANT DEED

The Undersigned Grantor(s) Declare(s): DOCUMENTARY TRANSFER TAX: $ 50,600.00 ; CITY TRANSFER TAX: $ 0.00 ; SURVEY MONUMENT FEE: $ _____

[X] computed on the consideration or full value of property conveyed, OR
[ ] computed on the consideration or full value less value of liens and/or encumbrances remaining at time of sale,
[ ] unincorporated area; [✕] City of Anaheim

U.S. Bank National Association, as Trustee, successor-in-interest to Bank of America, N.A., as Trustee, successor to Wells Fargo Bank, N.A., as Trustee for the Registered Holders of Wachovia Bank Commercial Mortgage Trust, Commercial Mortgage Pass-Through Certificates, Series 2007-C32 ("**Grantor**"), whose mailing address is c/o CWCapital Asset Management LLC, 7501 Wisconsin Avenue, Suite 500 West, Bethesda, Maryland 20814, for and in consideration of the sum of TEN AND NO/100 DOLLARS ($10.00) and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged from **Stadium Crossings JV Holdings LLC**, a Delaware limited liability company ("**Grantee**"), whose mailing address is 5 Park Plaza, Suite 370, Irvine, California 92614, has GRANTED, BARGAINED, SOLD AND CONVEYED, and by these presents does GRANT, BARGAIN, SELL AND CONVEY, unto Grantee, the following described property:

(i) That certain real property in Orange County, California, which is described on **Exhibit A** attached hereto and incorporated herein by reference (the "**Land**");

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

(ii) All buildings, structures, utility lines, utility facilities, utility improvements, street and drainage improvements, and other improvements of any kind or nature located in, on, or under the Land (all of the foregoing being referred to herein collectively as the "**Improvements**"); and

(iii) All appurtenances benefiting or pertaining to the Land or the Improvements, including, without limitation, all of Grantor's right, title, and interest in and to all development and utility rights and permits benefiting the Land and all streets, alleys, rights-of-way, or easements adjacent to or benefiting the Land, and all strips or pieces of land abutting, bounding, or adjacent to the Land (all of the foregoing being referred to herein collectively as the "**Appurtenances**").

The Land, Improvements and Appurtenances are collectively referred to herein as the "**Property**."

TO HAVE AND TO HOLD the Property, together with all and singular the rights and appurtenances thereto in anywise belonging unto Grantee, and Grantee's successors or assigns, forever; and, subject to all of the matters set forth or referred to herein, subject to: (a) all of the title exceptions revealed in or by the recorded documents as listed on **Exhibit B** attached hereto and incorporated herein by reference and affecting the Property; and (b) all taxes and assessments by any taxing authority for the current and all subsequent years, and all liens securing the payment of any of the foregoing.

GRANTEE ACKNOWLEDGES THAT GRANTOR HAS NOT MADE AND DOES NOT MAKE ANY REPRESENTATIONS AS TO THE PHYSICAL CONDITION OF THE PROPERTY, OR ANY OTHER MATTER AFFECTING OR RELATED TO THE PROPERTY. GRANTEE EXPRESSLY AGREES THAT TO THE MAXIMUM EXTENT PERMITTED BY LAW, THE PROPERTY IS CONVEYED "AS IS" AND "WITH ALL FAULTS", AND GRANTOR EXPRESSLY DISCLAIMS, AND GRANTEE ACKNOWLEDGES AND ACCEPTS THAT GRANTOR HAS DISCLAIMED, ANY AND ALL REPRESENTATIONS, WARRANTIES OR GUARANTIES OF ANY KIND, ORAL OR WRITTEN, EXPRESS OR IMPLIED, CONCERNING THE PROPERTY, INCLUDING, WITHOUT LIMITATION, (i) THE VALUE, CONDITION, MERCHANTABILITY, HABITABILITY, MARKETABILITY, PROFITABILITY, SUITABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE OF THE PROPERTY, (ii) THE MANNER OR QUALITY OF THE CONSTRUCTION OR MATERIALS, IF ANY, INCORPORATED INTO THE CONSTRUCTION, OF ANY IMPROVEMENTS TO THE PROPERTY, AND (iii) THE MANNER OF REPAIR, QUALITY OF REPAIR, STATE OF REPAIR OR LACK OF REPAIR OF ANY SUCH IMPROVEMENTS. BY GRANTEE'S ACCEPTANCE OF THIS DEED, GRANTEE REPRESENTS THAT GRANTEE HAS MADE (i) ALL INSPECTIONS OF THE PROPERTY TO DETERMINE ITS VALUE AND CONDITION DEEMED NECESSARY OR APPROPRIATE BY GRANTEE, INCLUDING, WITHOUT LIMITATION, INSPECTIONS FOR THE PRESENCE OF ASBESTOS, PESTICIDE RESIDUES, HAZARDOUS WASTE AND OTHER HAZARDOUS MATERIALS AND (ii) INVESTIGATIONS TO DETERMINE WHETHER ANY PORTION OF THE PROPERTY LIES WITHIN ANY FLOOD HAZARD AREA AS DETERMINED BY THE U.S. ARMY CORPS OF ENGINEERS OR OTHER APPLICABLE AUTHORITY.

[SIGNATURE PAGE FOLLOWS]

Attachment A

EXECUTED AND DELIVERED, to be effective as of the 7th day of December, 2017.

GRANTOR:

U.S. Bank National Association, as Trustee, successor-in-interest to Bank of America, N.A., as Trustee, successor to Wells Fargo Bank, N.A., as Trustee for the Registered Holders of Wachovia Bank Commercial Mortgage Trust, Commercial Mortgage Pass-Through Certificates, Series 2007-C32 (the "Trust")

By: CWCapital Asset Management LLC, a Delaware limited liability company, solely in its capacity as Special Servicer to the Trust

By: _____
Name: Dina Bell
Title: Vice President

STATE OF MARYLAND §
§
COUNTY OF MONTGOMERY §

BEFORE ME, personally appeared, Dina Bell, a Vice President of CWCapital Asset Management LLC, the special servicer to U.S. Bank National Association, as Trustee, successor-in-interest to Bank of America, N.A., as Trustee, successor to Wells Fargo Bank, N.A., for the Registered Holders of Wachovia Bank Commercial Mortgage Trust, Commercial Mortgage Pass-Through Certificates, Series 2007-C32, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this the 6th day of December, 2017.

NADINE AMY HEADLEY
Notary Public - Maryland
Prince George's County
My Commission Expires on
January 24, 2019

_____
Notary Public, State of Maryland
My Commission expires: 01.24.2019

Prepared by:
Quilling, Selander, Lownds, Winslett & Moser, PC
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
3389.1573

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXHIBIT A

Legal Description

PARCEL A:
PARCELS 2, 4, 5, 6 AND 7 OF PARCEL MAP NO. 97-155, IN THE CITY OF ANAHEIM, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 301, PAGES 15 TO 20 INCLUSIVE OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF ORANGE COUNTY, CALIFORNIA.

PARCEL B:

LOT 1 AS SHOWN ON LOT LINE ADJUSTMENT NO. 415, AS EVIDENCED BY DOCUMENT RECORDED DECEMBER 03, 1998 AS INSTRUMENT NO. 19980828170 OF OFFICIAL RECORDS, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEING COMBINED PARCELS 3 AND 8 OF PARCEL MAP 97-155 IN THE CITY OF ANAHEIM, AS RECORDED IN BOOK 301, PAGE 15-20 INCLUSIVE, OFFICE OF THE ORANGE COUNTY RECORDER, SAID COUNTY STATE OF CALIFORNIA; MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE MOST NORTHERLY CORNER OF SAID PARCEL 3, BEING ON THE SOUTHWESTERLY RIGHT-OF-WAY OF 100 FOOT WIDE ATCHISON, TOPEKA AND SANTA FE RAILROAD,

THENCE SOUTH 69°59'25" EAST COINCIDENT WITH SAID RIGHT-OF-WAY LINE A DISTANCE OF 530.81 FEET TO THE LINE ESTABLISHED AS THE EASTERLY LINE OF LAND TO MAURICE E. BIVENS PER DEED 62/45 OFFICIAL RECORDS OF SAID COUNTY;

THENCE SOUTH 00°40'24" WEST A DISTANCE OF 5.79 FEET TO THE NORTHWESTERLY RIGHT-OF-WAY LINE OF KATELLA AVENUE, BEING 120 FEET IN WIDTH; THE FOLLOWING SEVEN (7) COURSES ARE COINCIDENT WITH SAID RIGHT-OF-WAY LINE

1) SOUTH 49°46'03" WEST A DISTANCE OF 178.73 FEET TO THE BEGINNING OF A 940.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE NORTHWEST, A RADIAL TO SAID BEGINNING BEARS SOUTH 40°14'01" EAST;

2) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 06°19'32" AN ARC DISTANCE OF 103.78 FEET, TO THE BEGINNING OF A 600.00 FOOT RADIUS NONTANGENT CURVE, CONCAVE TO THE NORTH, A RADIAL TO SAID BEGINNING BEARS SOUTH 20°07'54" EAST;

3) THENCE WESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 01°28'39" AN ARC DISTANCE OF 15.47 FEET, TO THE BEGINNING OF A 159.00 FOOT RADIUS REVERSE CURVE, CONCAVE TO THE SOUTHEAST, A RADIAL TO SAID BEGINNING BEARS NORTH 18°39'15" WEST;

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

4) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 12°16'09" AN ARC DISTANCE OF 34.05 FEET, TO THE BEGINNING OF A 932.00 FOOT RADIUS REVERSE CURVE, CONCAVE TO THE NORTHWEST, A RADIAL TO SAID BEGINNING BEARS SOUTH 30°55'24" EAST;

5) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 09°08'00" AN ARC DISTANCE OF 148.57 FEET;

6) THENCE NON-TANGENT TO SAID CURVE, NORTH 65°03'23" WEST A DISTANCE OF 23.30 FEET;

7) THENCE SOUTH 71°40'38" WEST A DISTANCE OF 36.75 FEET TO THE EASTERLY LINE OF PARCEL 7 OF SAID PARCEL MAP;

THENCE LEAVING SAID RIGHT-OF WAY LINE NORTH 18°29'20" WEST COINCIDENT WITH SAID EASTERLY LINE A DISTANCE OF 160.98 FEET TO THE BEGINNING OF A 150.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTHWEST, A RADIAL TO SAID BEGINNING BEARS NORTH 71°30'48" EAST;

THENCE NORTHWESTERLY, ALONG SAID CURVE COINCIDENT WITH THE NORTHERLY LINE OF SAID PARCEL 7, THROUGH A CENTRAL ANGLE OF 08°50'06" AN ARC DISTANCE OF 23.13 FEET TO THE NORTHEASTERLY CORNER OF SAID LOT 7 ALSO BEING THE BEGINNING OF A 475.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE NORTH, A RADIAL TO SAID BEGINNING BEARS SOUTH 20°35'46" EAST;

THENCE WESTERLY, ALONG SAID CURVE AND THE NORTHERLY LINE OF SAID PARCEL 7,THROUGH A CENTRAL ANGLE OF 07°11'15" AN ARC DISTANCE OF 59.59 FEET TO THE EASTERLY LINE OF PARCEL 2 OF SAID PARCEL MAP;

THE FOLLOWING FIVE (5) COURSES ARE COINCIDENT WITH SAID EASTERLY LINE;

1) THENCE NON-TANGENT TO SAID CURVE, NORTH 00°42'37" EAST A DISTANCE OF 62.79 FEET TO THE BEGINNING OF A 514.33 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTHWEST, A RADIAL TO SAID BEGINNING BEARS NORTH 29°21'43" EAST;

2) THENCE NORTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 04°03'02" AN ARC DISTANCE OF 36.36 FEET;

3) THENCE NON-TANGENT TO SAID CURVE, NORTH 27°38'55" EAST A DISTANCE OF 162.92 FEET TO THE BEGINNING OF A 190.00 FOOT RADIUS TANGENT CURVE, CONCAVE TO THE NORTHWEST;

4) THENCE NORTHEASTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 07°49'50" AN ARC DISTANCE OF 25.97 FEET;

5) THENCE TANGENT TO SAID CURVE, NORTH 19°49'05" EAST A DISTANCE OF 51.36 FEET TO THE POINT OF BEGINNING.

EXHIBIT A

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

PARCEL C:

NON-EXCLUSIVE EASEMENTS FOR INGRESS AND EGRESS AND FOR PASSAGE AND PARKING OF MOTOR VEHICLES AND FOR INGRESS AND EGRESS AND PASSAGE OF PEDESTRIANS, AS SAID EASEMENTS ARE SET FORTH IN THAT CERTAIN DECLARATION OF RESTRICTIONS AND GRANT OF EASEMENTS, RECORDED JUNE 30, 1998 AS INSTRUMENT NO. 98-417209 OF OFFICIAL RECORDS, AS SUPPLEMENTED BY THAT CERTAIN SUPPLEMENT TO DECLARATION RECORDED MAY 30, 2000, AS INSTRUMENT NO. 20000281647, IN THE OFFICIAL RECORDS OF ORANGE COUNTY, CALIFORNIA.

APN: 253-531-13 (Affects Parcel 2 of Parcel A), 253-531-15 (Affects Parcel 4 of Parcel A), 253-531-16 (Affects Parcel 5 of Parcel A), 253-531-17 (Affects Parcel 6 of Parcel A), 253-531-18 (Affects Parcel 7 of Parcel A) and 253-531-23 (Affects Parcel B)

EXHIBIT A

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXHIBIT B

Permitted Exceptions

1. An easement for roads, railroads, ditches and incidental purposes, recorded in Book 91 of Deeds, Page 274.

   In Favor of: The City of Anaheim, successor in interest to the Stearns Rancho Company
   Affects: as described therein

2. An easement for flood control, water conservation and incidental purposes, recorded January 04, 1967 as Book 8145, Page 6 of Official Records.

   In Favor of: Orange County Flood Control District, a body corporate and politic
   Affects: as described therein

   Document re-recorded January 04, 1967 as Book 8145, Page 10 of Official Records.
   (Affects Parcel B and Parcels 2, 6, 7 of Parcel A)

3. An easement for highway and public utility and incidental purposes in the document recorded March 22, 1967 as Book 8205, Page 568 of Official Records.

   (Affects Parcel B)

4. The terms and provisions contained in the document entitled "Covenant not to Contest (undergrounding of utilities)" recorded April 12, 1991 as Instrument No. 91-170949 of Official Records.

5. The terms and provisions contained in the document entitled "Covenant not to Contest" recorded April 12, 1991 as Instrument No. 91-170950 of Official Records.

6. An irrevocable offer of dedication for road and public utility and incidental purposes, recorded July 03, 1991 as Instrument No. 91-345391 of Official Records.

   To: City of Anaheim, a Municipal Corporation

   (Affects Parcels 6 and 7 of Parcel A)

7. An easement shown or dedicated on the map of Parcel Map No. 97-155 recorded June 30, 1998 and on file in Book 301, Page 15-20, of Parcel Maps.

   For: The private street as an easement for public utility, emergency purposes including ingress and egress rights for maintenance and incidental purposes. Said easement was accepted for public use by a Resolution

   Executed by: City of Anaheim
   Recorded: January 23, 2002 as Instrument No. 20020060192, of Official Records

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

8. The terms and provisions contained in the document entitled "Subdivision Agreement" recorded June 30, 1998 as Instrument No. 19980417208 of Official Records.

9. Covenants, conditions, restrictions, easements, assessments, liens, charges, terms and provisions in the document recorded June 30, 1998 as Instrument No. 19980417209 of Official Records, which provide that a violation thereof shall not defeat or render invalid the lien of any first mortgage or deed of trust made in good faith and for value, but deleting any covenant, condition or restriction indicating a preference, limitation or discrimination based on race, color, religion, sex, handicap, familial status, national origin, sexual orientation, marital status, ancestry, source of income or disability, to the extent such covenants, conditions or restrictions violate Title 42, Section 3604(c), of the United States Codes. Lawful restrictions under state and federal law on the age of occupants in senior housing or housing for older persons shall not be construed as restrictions based on familial status.

   Document(s) declaring modifications thereof recorded May 30, 2000 as Instrument No. 20000281647 of Official Records.

10. The terms and provisions contained in the document entitled "Covenant to Maintain a 60 Foot Yard" recorded February 18, 1999 as Instrument No. 19990116423 of Official Records.

11. An easement for public utility, including ingress and egress for the installation and maintenance of electrical facilities and incidental purposes, recorded November 10, 1999 as Instrument No. 19990784210 of Official Records.

    In Favor of: City of Anaheim, a Municipal Corporation
    Affects: as described therein

    (Affects Parcel 2 of Parcel A)

12. An easement for public utility, including ingress and egress for the installation and maintenance of water facilities and incidental purposes, recorded December 20, 1999 as Instrument No. 19990861604 of Official Records.

    In Favor of: City of Anaheim, a Municipal Corporation
    Affects: as described therein

    (Affects Parcel B and Parcels 2 and 7 of Parcel A)

13. An easement for underground communication facilities and incidental purposes, recorded May 15, 2000 as Instrument No. 20000254632 of Official Records.

    In Favor of: Pacific Bell
    Affects: as described therein

    (Affects Parcel A and Portion of Parcel B)

14. An easement for underground communication facilities and incidental purposes, recorded May 15, 2000 as Instrument No. 20000254633 of Official Records.

EXHIBIT B

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

In Favor of: Pacific Bell
Affects: as described therein

(Affects Parcel 5 of Parcel A)

15. An easement for nonexclusive easement appurtenant to Parcel 1 of said Parcel Map 97-155 and incidental purposes in the document recorded June 21, 2000 as Instrument No. 20000326045 of Official Records.

16. An unrecorded lease dated March 26, 1998, executed by CH Anaheim, LTD., a California limited partnership as lessor and Carl Karcher Enterprises, Inc., a California Corporation as lessee, as disclosed by a Ground Lease (Short Form-Memorandum) recorded January 28, 1999 as Instrument No. 19990062004 of Official Records.

(Affects Parcel 6 of Parcel A)

17. An unrecorded lease dated April 15, 1999, executed by CH Anaheim, LTD., a California limited partnership as lessor and Legend Associates, Inc., a California Corporation as lessee, as disclosed by a Short Form Ground Lease recorded May 19, 2000 as Instrument No. 20000264605 of Official Records.

(Affects Parcel 5 of Parcel A)

EXHIBIT B

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXHIBIT 2

Grant Deed, recorded in the Official Records of Orange County, California, Instrument No. 2017000530371

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

Attachment A

Recorded in Official Records, Orange County
Hugh Nguyen, Clerk-Recorder
27.00
* $ R 0 0 0 9 7 5 4 0 0 3 $ *
2017000530371 8:00 am 12/11/17
90 405 G02 F13 7
0.00 0.00 0.00 0.00 18.00 0.00 0.00 0.00

When Recorded Return to: Thomas R. Barth
First American Title Insurance Company National Commercial Services
401 E. Pratt Street, Suite 323, Baltimore, MD 21202
NCS – 532315C –DC72

After Recording Return To:
Stadium Crossings Property Owner B LLC
c/o Pendulum Property Partners, LLC
5 Park Plaza, Suite 370
Irvine, California 92614
Attn: Kevin Hayes

Mail Tax Statement To:
Stadium Crossing Property Owner B, LLC
c/o Pendulum Property Partners, LLC
5 Park Plaza, Suite 370
Irvine, CA 92614

GRANT DEED

The grantors and the grantees in this conveyance are comprised of the same parties who continue to hold the same proportionate interest in the property, R & T 11925(d).

STADIUM CROSSINGS JV HOLDINGS LLC, a Delaware limited liability company ("**Grantor**"), whose mailing address is 5 Park Plaza, Suite 370, Irvine, California 92614, for and in consideration of the sum of TEN AND NO/100 DOLLARS ($10.00) and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged from **STADIUM CROSSINGS PROPERTY OWNER B LLC**, a Delaware limited liability company ("**Grantee**"), whose mailing address is 5 Park Plaza, Suite 370, Irvine, California 92614, has GRANTED, BARGAINED, SOLD AND CONVEYED, and by these presents does GRANT, BARGAIN, SELL AND CONVEY, unto Grantee, the following described property:

(i) That certain real property in Orange County, California, which is described on **Exhibit A** attached hereto and incorporated herein by reference (the "**Land**");

(ii) All buildings, structures, utility lines, utility facilities, utility improvements, street and drainage improvements, and other improvements of any kind or nature located in, on, or under the Land (all of the foregoing being referred to herein collectively as the "**Improvements**"); and

(iii) All appurtenances benefiting or pertaining to the Land or the Improvements, including, without limitation, all of Grantor's right, title, and interest in and to all development and utility rights and permits benefiting the Land and all streets, alleys, rights-of-way, or easements adjacent to or benefiting the Land, and all strips or pieces of land abutting, bounding, or adjacent to the Land (all of the foregoing being referred to herein collectively as the "**Appurtenances**").

The Land, Improvements and Appurtenances are collectively referred to herein as the "**Property**."

TO HAVE AND TO HOLD the Property, together with all and singular the rights and appurtenances thereto in anywise belonging unto Grantee, and Grantee's successors or assigns, forever; and, subject to all of the matters set forth or referred to herein, subject to: (a) all other covenants, conditions, and restrictions, reservations, rights, rights of way, easements, encumbrances, liens, and title matters of record or visible from an inspection of the Property or which an accurate survey of the Property

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

would disclose; and (b) all taxes and assessments by any taxing authority for the current and all subsequent years, and all liens securing the payment of any of the foregoing.

GRANTEE ACKNOWLEDGES THAT GRANTOR HAS NOT MADE AND DOES NOT MAKE ANY REPRESENTATIONS AS TO THE PHYSICAL CONDITION OF THE PROPERTY, OR ANY OTHER MATTER AFFECTING OR RELATED TO THE PROPERTY. GRANTEE EXPRESSLY AGREES THAT TO THE MAXIMUM EXTENT PERMITTED BY LAW, THE PROPERTY IS CONVEYED "AS IS" AND "WITH ALL FAULTS", AND GRANTOR EXPRESSLY DISCLAIMS, AND GRANTEE ACKNOWLEDGES AND ACCEPTS THAT GRANTOR HAS DISCLAIMED, ANY AND ALL REPRESENTATIONS, WARRANTIES OR GUARANTIES OF ANY KIND, ORAL OR WRITTEN, EXPRESS OR IMPLIED, CONCERNING THE PROPERTY, INCLUDING, WITHOUT LIMITATION, (i) THE VALUE, CONDITION, MERCHANTABILITY, HABITABILITY, MARKETABILITY, PROFITABILITY, SUITABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE OF THE PROPERTY, (ii) THE MANNER OR QUALITY OF THE CONSTRUCTION OR MATERIALS, IF ANY, INCORPORATED INTO THE CONSTRUCTION, OF ANY IMPROVEMENTS TO THE PROPERTY, AND (iii) THE MANNER OF REPAIR, QUALITY OF REPAIR, STATE OF REPAIR OR LACK OF REPAIR OF ANY SUCH IMPROVEMENTS. BY GRANTEE'S ACCEPTANCE OF THIS DEED, GRANTEE REPRESENTS THAT GRANTEE HAS MADE (i) ALL INSPECTIONS OF THE PROPERTY TO DETERMINE ITS VALUE AND CONDITION DEEMED NECESSARY OR APPROPRIATE BY GRANTEE, INCLUDING, WITHOUT LIMITATION, INSPECTIONS FOR THE PRESENCE OF ASBESTOS, PESTICIDE RESIDUES, HAZARDOUS WASTE AND OTHER HAZARDOUS MATERIALS AND (ii) INVESTIGATIONS TO DETERMINE WHETHER ANY PORTION OF THE PROPERTY LIES WITHIN ANY FLOOD HAZARD AREA AS DETERMINED BY THE U.S. ARMY CORPS OF ENGINEERS OR OTHER APPLICABLE AUTHORITY.

[SIGNATURE PAGE FOLLOWS]

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXECUTED AND DELIVERED, to be effective as of the 7th day of December, 2017.

GRANTOR:

STADIUM CROSSINGS JV HOLDINGS LLC,
a Delaware limited liability company

By: _____
Name: Kevin Hayes
Its: Authorized Signatory

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Orange)

On 12-5-17, before me, Carrie E. Strand, a Notary Public, personally appeared Kevin Hayes, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Carrie E. Strand

CARRIE E. STRAND
Notary Public - California
Orange County
Commission # 2175579
My Comm. Expires Jan 5, 2021

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXHIBIT A

Legal DescriptionLOT 1 AS SHOWN ON LOT LINE ADJUSTMENT NO. 415, AS EVIDENCED BY DOCUMENT RECORDED DECEMBER 03, 1998 AS INSTRUMENT NO. 19980828170 OF OFFICIAL RECORDS, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEING COMBINED PARCELS 3 AND 8 OF PARCEL MAP 97-155 IN THE CITY OF ANAHEIM, AS RECORDED IN BOOK 301, PAGE 15-20 INCLUSIVE, OFFICE OF THE ORANGE COUNTY RECORDER, SAID COUNTY STATE OF CALIFORNIA; MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE MOST NORTHERLY CORNER OF SAID PARCEL 3, BEING ON THE SOUTHWESTERLY RIGHT-OF-WAY OF 100 FOOT WIDE ATCHISON, TOPEKA AND SANTA FE RAILROAD,

THENCE SOUTH 69°59'25" EAST COINCIDENT WITH SAID RIGHT-OF-WAY LINE A DISTANCE OF 530.81 FEET TO THE LINE ESTABLISHED AS THE EASTERLY LINE OF LAND TO MAURICE E. BIVENS PER DEED 62/45 OFFICIAL RECORDS OF SAID COUNTY;

THENCE SOUTH 00°40'24" WEST A DISTANCE OF 5.79 FEET TO THE NORTHWESTERLY RIGHT-OF-WAY LINE OF KATELLA AVENUE, BEING 120 FEET IN WIDTH; THE FOLLOWING SEVEN (7) COURSES ARE COINCIDENT WITH SAID RIGHT-OF-WAY LINE

1) SOUTH 49°46'03" WEST A DISTANCE OF 178.73 FEET TO THE BEGINNING OF A 940.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE NORTHWEST, A RADIAL TO SAID BEGINNING BEARS SOUTH 40°14'01" EAST;

2) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 06°19'32" AN ARC DISTANCE OF 103.78 FEET, TO THE BEGINNING OF A 600.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE NORTH, A RADIAL TO SAID BEGINNING BEARS SOUTH 20°07'54" EAST;

3) THENCE WESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 01°28'39" AN ARC DISTANCE OF 15.47 FEET, TO THE BEGINNING OF A 159.00 FOOT RADIUS REVERSE CURVE, CONCAVE TO THE SOUTHEAST, A RADIAL TO SAID BEGINNING BEARS NORTH 18°39'15" WEST;

4) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 12°16'09" AN ARC DISTANCE OF 34.05 FEET, TO THE BEGINNING OF A

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

932.00 FOOT RADIUS REVERSE CURVE, CONCAVE TO THE NORTHWEST, A RADIAL TO SAID BEGINNING BEARS SOUTH 30°55'24" EAST;

5) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 09°08'00" AN ARC DISTANCE OF 148.57 FEET;

6) THENCE NON-TANGENT TO SAID CURVE, NORTH 65°03'23" WEST A DISTANCE OF 23.30 FEET;

7) THENCE SOUTH 71°40'38" WEST A DISTANCE OF 36.75 FEET TO THE EASTERLY LINE OF PARCEL 7 OF SAID PARCEL MAP ;

THENCE LEAVING SAID RIGHT-OF WAY LINE NORTH 18°29'20" WEST COINCIDENT WITH SAID EASTERLY LINE A DISTANCE OF 160.98 FEET TO THE BEGINNING OF A 150.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTHWEST, A RADIAL TO SAID BEGINNING BEARS NORTH 71°30'48" EAST;

THENCE NORTHWESTERLY, ALONG SAID CURVE COINCIDENT WITH THE NORTHERLY LINE OF SAID PARCEL 7, THROUGH A CENTRAL ANGLE OF 08°50'06" AN ARC DISTANCE OF 23.13 FEET TO THE NORTHEASTERLY CORNER OF SAID LOT 7 ALSO BEING THE BEGINNING OF A 475.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE NORTH, A RADIAL TO SAID BEGINNING BEARS SOUTH 20°35'46" EAST;

THENCE WESTERLY, ALONG SAID CURVE AND THE NORTHERLY LINE OF SAID PARCEL 7, THROUGH A CENTRAL ANGLE OF 07°11'15" AN ARC DISTANCE OF 59.59 FEET TO THE EASTERLY LINE OF PARCEL 2 OF SAID PARCEL MAP;

THE FOLLOWING FIVE (5) COURSES ARE COINCIDENT WITH SAID EASTERLY LINE;

1) THENCE NON-TANGENT TO SAID CURVE, NORTH 00°42'37" EAST A DISTANCE OF 62.79 FEET TO THE BEGINNING OF A 514.33 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTHWEST, A RADIAL TO SAID BEGINNING BEARS NORTH 29°21'43" EAST;

2) THENCE NORTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 04°03'02" AN ARC DISTANCE OF 36.36 FEET;

3) THENCE NON-TANGENT TO SAID CURVE, NORTH 27°38'55" EAST A DISTANCE OF 162.92 FEET TO THE BEGINNING OF A 190.00 FOOT RADIUS TANGENT CURVE, CONCAVE TO THE NORTHWEST;

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

4) THENCE NORTHEASTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 07°49'50" AN ARC DISTANCE OF 25.97 FEET;

5) THENCE TANGENT TO SAID CURVE, NORTH 19°49'05" EAST A DISTANCE OF 51.36 FEET TO THE POINT OF BEGINNING.

PARCEL C:

NON-EXCLUSIVE EASEMENTS FOR INGRESS AND EGRESS AND FOR PASSAGE AND PARKING OF MOTOR VEHICLES AND FOR INGRESS AND EGRESS AND PASSAGE OF PEDESTRIANS, AS SAID EASEMENTS ARE SET FORTH IN THAT CERTAIN DECLARATION OF RESTRICTIONS AND GRANT OF EASEMENTS, RECORDED JUNE 30, 1998 AS INSTRUMENT NO. 98-417209 OF OFFICIAL RECORDS, AS SUPPLEMENTED BY THAT CERTAIN SUPPLEMENT TO DECLARATION RECORDED MAY 30, 2000, AS INSTRUMENT NO. 20000281647, IN THE OFFICIAL RECORDS OF ORANGE COUNTY, CALIFORNIA.

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXHIBIT 3

Grant Deed, recorded in the Official Records of Orange County, California, Instrument No. 2022000100239

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

Attachment A

Recorded in Official Records, Orange County
Hugh Nguyen, Clerk-Recorder
42.00
* $ R 0 0 1 3 5 9 8 4 6 3 $ *
2022000100239 4:15 pm 03/14/22
7 RecS4A G02 6 01
17325.00 17325.00 20.00 0.00 15.00 0.00 0.000.000.00 0.00

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

KB Stadium Crossings, DST
c/o Kingsbarn Real Estate Capital, LLC
11622 El Camino Real, 1st Floor
Del Mar, California 92130
Attn: General Counsel

(Above Space For Recorder's Use Only)

GRANT DEED

The undersigned grantor declares:
Documentary Transfer Tax is $ 34,650.00,
computed on the full value of property conveyed

City of Anaheim
County of Orange

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, STADIUM CROSSINGS PROPERTY OWNER B LLC, a Delaware limited liability company, hereby GRANTS to KB STADIUM CROSSINGS, DST, a Delaware statutory trust, that certain real property which is more particularly described on Exhibit A which is attached hereto and all improvements located thereon.

Subject to:

1. Nondelinquent taxes and assessments;

2. All other covenants, conditions, and restrictions, reservations, rights, rights of way, easements, encumbrances, liens, and title matters of record or which an accurate survey of the property would disclose.

[SIGNATURE ON NEXT PAGE]

When Recorded Return To:
First American Title Insurance Company
National Commercial Services
18500 Von Karman Ave, Suite 600
Irvine, CA 92612
File No: NCS-1104075-SA1

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

GRANTOR

STADIUM CROSSINGS PROPERTY OWNER B LLC,
A Delaware limited liability company

By: _____
Name: Kevin Hayes
Title: Authorized Signatory

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Orange)

On March 7, 2022, before me, Carrie E. Strand, (insert name of notary)
Notary Public, personally appeared Kevin Hayes,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Carrie E. Strand (Seal)

CARRIE E. STRAND
Notary Public - California
Orange County
Commission # 2354448
My Comm. Expires Apr 14, 2025

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXHIBIT A

Legal Description

All that real property located in the State of California, County of Orange, described as follows:

LOT 1 AS SHOWN ON LOT LINE ADJUSTMENT NO. 415, AS EVIDENCED BY DOCUMENT RECORDED DECEMBER 03, 1998 AS INSTRUMENT NO. 19980828170 OF OFFICIAL RECORDS, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEING COMBINED PARCELS 3 AND 8 OF PARCEL MAP 97-155 IN THE CITY OF ANAHEIM, AS RECORDED IN BOOK 301, PAGE 15-20 INCLUSIVE, OFFICE OF THE ORANGE COUNTY RECORDER, SAID COUNTY STATE OF CALIFORNIA; MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE MOST NORTHERLY CORNER OF SAID PARCEL 3, BEING ON THE SOUTHWESTERLY RIGHT-OF-WAY OF 100 FOOT WIDE ATCHISON, TOPEKA AND SANTA FE RAILROAD,

THENCE SOUTH 69°59'25" EAST COINCIDENT WITH SAID RIGHT-OF-WAY LINE A DISTANCE OF 530.81 FEET TO THE LINE ESTABLISHED AS THE EASTERLY LINE OF LAND TO MAURICE E. BIVENS PER DEED 62/45 OFFICIAL RECORDS OF SAID COUNTY;

THENCE SOUTH 00°40'24" WEST A DISTANCE OF 5.79 FEET TO THE NORTHWESTERLY RIGHT-OF-WAY LINE OF KATELLA AVENUE, BEING 120 FEET IN WIDTH; THE FOLLOWING SEVEN (7) COURSES ARE COINCIDENT WITH SAID RIGHT-OF-WAY LINE

1) SOUTH 49°46'03" WEST A DISTANCE OF 178.73 FEET TO THE BEGINNING OF A 940.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE NORTHWEST, A RADIAL TO SAID BEGINNING BEARS SOUTH 40°14'01" EAST;

2) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 06°19'32" AN ARC DISTANCE OF 103.78 FEET, TO THE BEGINNING OF A 600.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE NORTH, A RADIAL TO SAID BEGINNING BEARS SOUTH 20°07'54" EAST;

3) THENCE WESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 01°28'39" AN ARC DISTANCE OF 15.47 FEET, TO THE BEGINNING OF A 159.00 FOOT RADIUS REVERSE CURVE, CONCAVE TO THE SOUTHEAST, A RADIAL TO SAID BEGINNING BEARS NORTH 18°39'15" WEST;

4) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 12°16'09" AN ARC DISTANCE OF 34.05 FEET, TO THE BEGINNING OF A

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

932.00 FOOT RADIUS REVERSE CURVE, CONCAVE TO THE NORTHWEST, A RADIAL TO SAID BEGINNING BEARS SOUTH 30°55'24" EAST;

5) THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 09°08'00" AN ARC DISTANCE OF 148.57 FEET;

6) THENCE NON-TANGENT TO SAID CURVE, NORTH 65°03'23" WEST A DISTANCE OF 23.30 FEET;

7) THENCE SOUTH 71°40'38" WEST A DISTANCE OF 36.75 FEET TO THE EASTERLY LINE OF PARCEL 7 OF SAID PARCEL MAP ;

THENCE LEAVING SAID RIGHT-OF WAY LINE NORTH 18°29'20" WEST COINCIDENT WITH SAID EASTERLY LINE A DISTANCE OF 160.98 FEET TO THE BEGINNING OF A 150.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTHWEST, A RADIAL TO SAID BEGINNING BEARS NORTH 71°30'48" EAST;

THENCE NORTHWESTERLY, ALONG SAID CURVE COINCIDENT WITH THE NORTHERLY LINE OF SAID PARCEL 7, THROUGH A CENTRAL ANGLE OF 08°50'06" AN ARC DISTANCE OF 23.13 FEET TO THE NORTHEASTERLY CORNER OF SAID LOT 7 ALSO BEING THE BEGINNING OF A 475.00 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE NORTH, A RADIAL TO SAID BEGINNING BEARS SOUTH 20°35'46" EAST;

THENCE WESTERLY, ALONG SAID CURVE AND THE NORTHERLY LINE OF SAID PARCEL 7, THROUGH A CENTRAL ANGLE OF 07°11'15" AN ARC DISTANCE OF 59.59 FEET TO THE EASTERLY LINE OF PARCEL 2 OF SAID PARCEL MAP;

THE FOLLOWING FIVE (5) COURSES ARE COINCIDENT WITH SAID EASTERLY LINE;

1) THENCE NON-TANGENT TO SAID CURVE, NORTH 00°42'37" EAST A DISTANCE OF 62.79 FEET TO THE BEGINNING OF A 514.33 FOOT RADIUS NON-TANGENT CURVE, CONCAVE TO THE SOUTHWEST, A RADIAL TO SAID BEGINNING BEARS NORTH 29°21'43" EAST;

2) THENCE NORTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 04°03'02" AN ARC DISTANCE OF 36.36 FEET;

3) THENCE NON-TANGENT TO SAID CURVE, NORTH 27°38'55" EAST A DISTANCE OF 162.92 FEET TO THE BEGINNING OF A 190.00 FOOT RADIUS TANGENT CURVE, CONCAVE TO THE NORTHWEST;

4) THENCE NORTHEASTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 07°49'50" AN ARC DISTANCE OF 25.97 FEET;

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

5) THENCE TANGENT TO SAID CURVE, NORTH 19°49'05" EAST A DISTANCE OF 51.36 FEET TO THE POINT OF BEGINNING.

NON-EXCLUSIVE EASEMENTS FOR INGRESS AND EGRESS AND FOR PASSAGE AND PARKING OF MOTOR VEHICLES AND FOR INGRESS AND EGRESS AND PASSAGE OF PEDESTRIANS, AS SAID EASEMENTS ARE SET FORTH IN THAT CERTAIN DECLARATION OF RESTRICTIONS AND GRANT OF EASEMENTS, RECORDED JUNE 30, 1998 AS INSTRUMENT NO. 98-417209 OF OFFICIAL RECORDS, AS SUPPLEMENTED BY THAT CERTAIN SUPPLEMENT TO DECLARATION RECORDED MAY 30, 2000, AS INSTRUMENT NO. 20000281647, IN THE OFFICIAL RECORDS OF ORANGE COUNTY, CALIFORNIA.

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

EXHIBIT 4

Assignment of Leases, dated March 14, 2022

ASSIGNMENT OF LEASES

THIS ASSIGNMENT OF LEASES ("Assignment") is made this 14th day of March 2022 ("**Assignment Date**") by and between STADIUM CROSSINGS PROPERTY OWNER B, LLC, a Delaware limited liability company ("**Assignor**"), and KB STADIUM CROSSINGS, DST, a Delaware statutory trust ("**Assignee**").

W I T N E S E T H:

A. Assignor and KB Acquisitions, LLC, a Nevada limited liability company, predecessor-in-interest to Assignee, entered into that certain Agreement of Purchase and Sale and Joint Escrow Instructions, dated as of January 18, 2022, as amended by that certain First Amendment to Agreement of Purchase and Sale and Joint Escrow Instructions dated February 18, 2022 (collectively, the "**Agreement**"), respecting the sale of the Property. Capitalized terms used herein and not separately defined have the meanings ascribed to them in the Agreement.

B. Under the Agreement, Assignor is obligated to assign to Assignee all of Assignor's right, title and interest in and to the Leases as set forth on Schedule 1 attached hereto and security deposits paid by tenants ("**Tenants**") under the Leases to Assignor ("**Deposits**").

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties hereto hereby agree as follows:

1. Effective as of the Assignment Date, Assignor hereby assigns, sells, transfers, sets over and delivers unto Assignee all of Assignor's estate, right, title and interest in and to the Leases and the Deposits and Assignee hereby accepts such assignment. Notwithstanding the foregoing or anything to the contrary contained herein, Assignor shall retain all rights, title and interest in and to all rentals and other amounts payable by Tenants, and other rights and claims against any parties, under the Leases for the period of time prior to the Assignment Date.

2. Assignor hereby covenants that Assignor will, at any time and from time to time upon written request therefor, execute and deliver to Assignee, Assignee's successors, nominees or assigns, such documents as Assignee or they may reasonably request in order to fully assign and transfer to and vest in Assignee or Assignee's successors, nominees and assigns the Leases and the Deposits.

3. Assignee hereby assumes the performance of all of the terms, covenants and conditions imposed upon Assignor as landlord under the Leases accruing or arising on or after the Assignment Date.

4. Assignee hereby assumes the performance of all of the terms, covenants and conditions imposed upon Assignor as landlord under the Leases accruing or arising on or after the Assignment Date.

5. In the event of the bringing of any action or suit by a party hereto against another party hereunder by reason of any breach of any of the covenants, conditions, agreements or

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

provisions on the part of the other party arising out of this Assignment, then in that event the prevailing party shall be entitled to have and recover of and from the other party all costs and expenses of the action or suit, including reasonable attorneys' fees.

6. This Assignment may be executed in counterparts, each of which shall be deemed an original, but all of which, together, shall constitute one and the same instrument. Executed counterparts delivered by facsimile or email/PDF shall have the same force and effect as wet-signed original counterparts.

7. This Assignment shall be binding upon and inure to the benefit of the successors, assignees, personal representatives, heirs and legatees of all the respective parties hereto.

8. This Assignment shall be governed by, interpreted under, and construed and enforceable in accordance with, the laws of the State of California.

[SIGNATURE PAGES FOLLOW]

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

IN WITNESS WHEREOF, Assignor and Assignee have executed and delivered this Assignment as of the day and year first written above.

"ASSIGNOR" **STADIUM CROSSINGS PROPERTY OWNER B LLC,**
a Delaware limited liability company

By: _____
Name: Kevin Hayes
Title: Authorized Signatory

[Signatures Continue on Next Page]

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

"ASSIGNEE" **KB STADIUM CROSSINGS, DST,**
a Delaware statutory trust

By: KB Stadium Crossings ST, LLC,
a Delaware limited liability company,
its Signatory Trustee

By: KB Stadium Crossings SPE Member, LLC,
a Delaware limited liability company,
its Manager

By: KB Exchange Properties, LLC,
a Nevada limited liability company,
its Manager

By: Kingsbarn Realty Capital, LLC,
a Nevada limited liability company,
its Manager

By: _____
Ray Jones, Authorized Signatory

Docusign Envelope ID: 02BE3822-5E21-493C-A4BB-BC42BACE3A15

SCHEDULE 1

LEASES

County of Orange – Lease dated June 17, 2014 ("Orange County Lease")

NCS Pearson, Inc. – Lease dated July, 17, 2017

Sunpower Corporation – Lease dated May 10, 2011
First Amendment dated November 18, 2016

National Technical Systems, Inc. – Lease dated January 4, 2018

Edge Mortgage Advisory Company, LLC – Lease dated March 1, 2011
First Amendment dated October 11, 2013
Second Amendment dated April 7, 2014
Third Amendment dated October 1, 2017
Fourth Amendment dated December 11, 2019
Consent to Assignment dated July 1, 2021

United States of America (GSA) – Lease fully executed on December 15, 2021

Attachment B

Real Property Acquisition Questionnaire* for ASR

(*Applies to property purchase, or acquisition lease, license or easement)

Instructions:

- This questionnaire was developed with input from Auditor Controller, Internal Auditor and CEO Real Estate to assure that County leadership is fully informed.
- Insert the complete answer after each question below.
- When completed, save and include as an Attachment to your ASR.
- In the body of the ASR focus on the considerations relevant to the decision.
- If you need assistance, please contact CEO Real Estate.

1. What property interest is being considered for acquisition (fee, lease, license, easement)?
Lease Agreement for property located at 2125 E. Katella Avenue in Anaheim

a) Why is this property being considered for acquisition? The proposed site is currently an excellent option to continue the current use for Social Services Agency (SSA). The proposed site is within the desired geographical area with ample parking.
b) How and who identified this property for a potential acquisition? SSA and CEO/Real Estate agreed this is the best site option at this time.
c) What factors are key in recommending this property for acquisition? Price, location and program service requirements are the key factors for recommending this site.
d) How does the proposed acquisition fit into the County's/District's strategic or general plan? Providing a convenient central Orange County location for SSA's Orange Call and Processing Center.
e) What are the short and long term anticipated uses of the property? The Social Services Agency will use the site to conduct call center operations, known as the Orange Call and Processing Center.
f) Are there any limitations on the use of the property for its intended purposes? None

2. What analysis has been performed as to whether to acquire the proposed real property interest? SSA and CEO/Real Estate collaborated to determine that this location best fits program and client needs.
a) Have there been any internally or externally prepared reports regarding this property acquisition? A market analysis and lease cost comparison has been completed.
b) Who performed the analysis? CEO Real Estate and JLL
c) Provide details about the analysis and cost/benefit comparison. This site was determined to be the best fit with rental rates consistent with market rates while the agency evaluates its long-term strategic real estate and portfolio optimization. Under the terms of the Proposed Second Amendment, the starting rental rate will be $2.70 per RSF (Rent) and will increase annually at a fixed three percent. For the first six months of the extension term the Rent will be abated at a rate of fifty percent. The Rent Abatement results in an average rental rate of $2.58 per RSF during the extension term (a reduced rental rate from the existing rent), which will generate County savings of $447,933.

3. How was the acquisition price, or lease/license rent, determined? JLL and CEO/Real Estate negotiate with the Landlord for optimal full service gross lease rate.
a) Who performed the appraisal or market study and what certifications do they possess? CEO/Real Estate and JLL, utilizing market data obtained through market databases and comparable transactions.
b) How does the price/rent compare with comparable properties? The rental rate is at current market for the Central Orange County area.
c) Does the setting of the price/rent follow industry standards and best practices? Yes
d) What are the specific maintenance requirements and other costs within the agreement and who is responsible? Provide an estimate of the costs to the County/District if applicable. The Lessor is responsible for all interior and exterior maintenance, except County shall be responsible for telephone, internet and cable services.

Attachment B

4. What additional post-acquisition remodeling or upgrade costs will be needed for the property to meet its intended use? None
   a) Will any of the upgrades be required to meet County, ADA, or other standards and requirements? None
   b) Include estimates of the costs. N/A
   c) What department will be responsible for the costs? N/A

5. Can the County terminate the purchase/easement, lease/license? Yes
   a) What would be necessary to terminate the agreement, and when can it be terminated? At least 9 months' prior written notice prior to then termination date. N/A

   b) Are there penalties to terminate the purchase/easement, or lease/license? NoN/A

6. What department will be responsible for the acquisition payments? SSA
   a) Are the acquisition costs budgeted in the department's budget? Yes
7. What fund number will the funds for the acquisition ultimately be drawn from?
100-063 County General/SSA
   c) Will any restricted funds be used for the acquisition? (Check with the Auditor Controller's General Accounting Unit and Counsel if you have questions about whether restricted funds are involved.) No.
   d) If restricted funds will be used, has County Counsel advised that this is an allowable use of the proposed restricted funds? N/A

7. Does the proposed purchase/lease/license/easement agreement comply with the CEO Real Estate standard language? Yes
   a) List any modified clauses and reasons for modification.

Clause 35 - in order to comply with the current lessor ownership structure:

"**35. MASTER LEASE AGREEMENT (N)**

Lessor represents and warrants to County that (a) as of the Effective Date hereof, the Master Lease is in full force and effect, and that neither DST nor Lessor are in breach or default under the Master Lease, nor has any event occurred, which, with the passage of time or the giving of notice, or both, would constitute a breach of default by Lessor or DST under the Master Lease, and (b) following the expiration or earlier termination of the Master Lease, the Master Lease requires that DST automatically assume all of Lessor's duties and obligations under the Lease, as amended hereby. Lessor shall indemnify and hold County harmless from and against all losses, costs, damages and claims arising out of or in connection with Lessor's breach of this Clause 35."

J. Wherever a conflict in the terms or conditions of this Second Amendment and/or First Amendment and/or the Lease exists, the terms or conditions in the Second Amendment shall prevail. In all other respects, the terms and conditions of the Lease and First Amendment, not specifically changed by this Second Amendment, shall remain in full force and effect.

K. The Parties agree that the First Amendment is hereby corrected and amended by this Second Amendment (a) to provide that "Lessor" shall mean and refer only to KB STADIUM CROSSINGS MT, LLC, a Delaware limited liability company, and (b) to remove any reference to the Master Lease being attached as an exhibit to the First Amendment.

Attachment C

CEO/ALS/SSA-13-048
Social Services Agency/Call Center
2125 E. Katella Avenue, 1st and 4th Floors,
Anaheim, CA 92806

LEASE SUMMARY

LESSOR

KB STADIUM CROSSINGS MT, LLC, a Delaware limited liability company

COUNTY

County of Orange

LOCATION

2125 E. Katella Avenue, Anaheim

PREMISES

Approximately 53,674 rentable square feet

TERM

39 months ("**Term**"), commencing on January 1, 2025 and will expire on March 31, 2028.

RENT

Period	Rent	Per Square Foot
1/1/2025 – 2/28/2025	$72,459.90	$1.35
3/1/2025 – 12/31/2025	$144,919.80	$2.70
1/1/2026 – 2/28/2026	$74,633.70	$1.39
3/1/2026 – 12/31/2026	$149,267.39	$2.78
1/1/2027 – 2/28/2027	$76,872.71	$1.43
3/1/2027 – 12/31/2027	$153,745.42	$2.86
1/1/2028 – 3/31/2028	$158,357.78	$2.95

Attachment C

CEO/ALS/SSA-13-048
Social Services Agency/Call Center
2125 E. Katella Avenue, 1st and 4th Floors,
Anaheim, CA 92806

COUNTY-REQUESTED ALTERATIONS

County may, during the Term of the Lease, request Lessor to make improvements and changes to the Premises as well as request Lessor to complete Additional Services to the Premises.

All such improvements and changes and any Additional Services requested by County shall be made by Lessor, at Lessor's sole cost, and shall be reimbursed in a lump sum as Additional Rent by County upon receipt by County from Lessor of a written claim for such reimbursement.

SERVICES PROVIDED BY LESSOR

Lessor shall provide, at its sole cost and expense (except as otherwise provided in this Lease) any and all necessary repair, maintenance and replacement for the Premises and Building (and systems therein) including, but not limited to:

- Operating Expenses
- Structural portions of the Building /roof
- Parking facilities/paving
- Heating, ventilation, air conditioning ("HVAC") system
- Plumbing, electrical and mechanical systems
- Fire/life safety system
- Elevators
- Interior and exterior maintenance repairs
- Janitorial Services – 5 days per week
- Property/ Fire Insurance and Liability Insurance
- Taxes and Assessment

SERVICES PROVIDED BY COUNTY

County shall be responsible for telephone services.

HOLDOVER

In the event County shall continue in possession of the Premises after the Term of this Lease, such possession shall not be considered a renewal of this Lease but a tenancy from month to month and shall be governed by the conditions and covenants contained in this Lease. However, rent shall be payable at the rate of 105% of the rent paid immediately prior to the termination of the term.