

City of Villa Park

2021-2029 Housing Element



Revised Draft

June 2022

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IV. HOUSING

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I. Introduction

A. Purpose of the Element

Providing adequate housing for families and individuals of all economic levels is an important objective for State and local governments. The California Legislature amended the Government Code in 1980 to require that each local community include in its Housing Element a specific analysis of its housing needs and a realistic set of programs designed to meet those needs. This Housing Element carries out the required analysis.

B. State Housing Law Requirements

The State Government Code describes the Housing Element as follows:

The Housing Element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement and development of housing. 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.

Housing elements have been a required part of city General Plans since 1967. State law requires that the Housing Element be updated periodically, and this Housing Element covers the 2021-2029 planning period, also referred to as the “6th cycle” in reference to the six required Housing Element updates since the comprehensive revision to State Housing Element law in 1980.¹ The Housing Element provides information on the City’s housing needs, resources and constraints; and establishes goals, policies, programs and objectives to address current circumstances and needs.

C. Relationship to Other Elements

The City’s General Plan is comprised of seven state-mandated elements (open space and conservation have been combined) and one optional element. The mandated elements include: Land Use, Circulation, Housing, Open Space/Conservation, Noise, and Seismic/Safety. The General Plan also includes an optional Growth Management Element. The Housing Element is most closely correlated with the Land Use Element, which identifies the allowable location and development characteristics for residential land uses.

State law requires that all elements of the General Plan be internally consistent. In addition, Government Code §65302 requires that the Safety and Conservation elements be reviewed and updated as necessary to reflect current flood hazard and management information upon the next revision of the Housing Element after January 1, 2009. The City last updated the Safety and Conservation elements in 2019 and will ensure compliance with this requirement concurrent with the 2021 Housing Element update. As part of the Housing Element update process, the City will also review other General Plan elements and if any conflicts between the updated Housing Element and other elements are identified, appropriate amendments will be processed to ensure that consistency is maintained.

1 Chapter 1143, Statutes of 1980 (AB 2853)

D. Community Overview

Regional Setting

The City of Villa Park is located in north-central Orange County, approximately 15 miles northeast of the Pacific Ocean. Located near six major freeways that connect the City to other locations in Orange, Los Angeles and Riverside Counties, Villa Park is near the cities of Anaheim, Santa Ana, Tustin and Orange. The City was incorporated in 1962. Although the City has no direct freeway frontage, interstate and regional access to the City is provided by the SR-55 freeway. In addition, City connections to the counties of San Diego, Los Angeles, Riverside, and San Bernardino are provided by freeways nearby, including SR-57 (Orange Freeway), Interstate-5 (Santa Ana Freeway), SR-22 (Garden Grove Freeway) and SR-91 (Riverside Freeway).

Local Setting

Villa Park encompasses 2.1 square miles and is the smallest city in Orange County. Most of the vacant land in the city is occupied by the Santiago Creek Recharge Basin and utility easements. Villa Park is a predominantly residential community with relatively few commercial businesses and professional offices. It has the smallest population of the cities in Orange County and has no large employment centers or central business district. Geographically, Villa Park is almost completely surrounded by the City of Orange with only a small amount of unincorporated Orange County separating the two cities on the south side of the city. Villa Park contains only a small amount of vacant land or open space, and no sphere of influence. There is no privately held vacant land adjacent to the City that could be annexed for development.

E. Citizen Participation

The citizen participation process for the 2021 Housing Element update included review by the City Council, a period of public comment on the Draft Housing Element, and a City Council public hearing on the final Housing Element. In order to involve the public, particularly low-income population and their representatives and/or advocates, the City completed the following outreach efforts:

- The City notified by letter and solicited input on the Draft Housing Element from a variety of groups and non-profit housing organizations representing the interests of lower-income households and persons with special needs.
- The City Council conducted four public meetings to discuss the Draft Housing Element Update and take public input on December 15, 2020, March 9, 2021, April 13, 2021 and May 11, 2021.
- Copies of the Draft Housing Element were available at the local library, City Hall and on the City's website.
- On April 19, 2021, the City mailed out informational packets on the Housing Element update, potential affordable housing options, and City Council public hearing details to all Villa Park residents and property owners. Copies of the informational package were also posted on the City website and hard copies were made available in City Hall.
- Public notice of each public hearing held by the City Council and the availability of the draft Housing Element was published in the local newspaper and sent to all

homeowners' associations, interested organizations and various State and Local Agencies.

Appendix B provides additional information regarding public participation throughout the Housing Element update process and how public comments have been addressed. Table B-3 in Appendix B includes a list of comments received from residents in response to the City's Housing Element information mailout.

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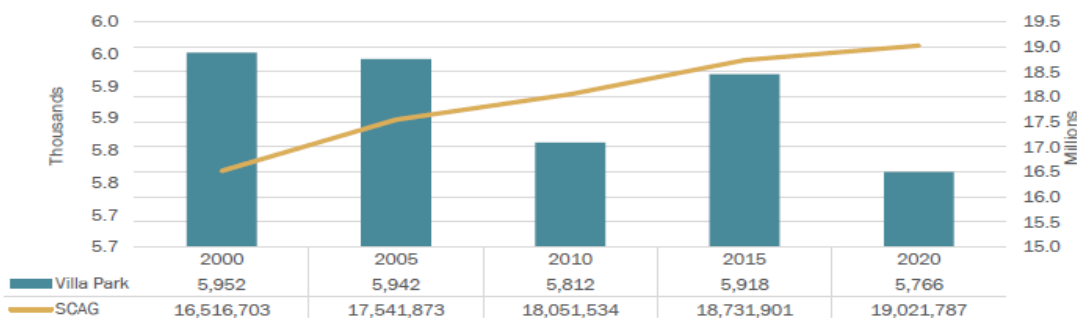
II. Housing Needs Assessment

This chapter includes an assessment of population and housing characteristics, housing needs in the community, including special needs, and the City’s share of regional housing needs to accommodate population growth. Most of this information was compiled by the Southern California Association of Governments (SCAG) and has been approved by the California Department of Housing and Community Development (HCD) for use in the Housing Element.²

A. Population

Villa Park has an estimated total population of 5,766 as of 2020, including 45 living in group quarters according to the California Department of Finance. Figure IV-1 shows population trends in Villa Park from 2000 to 2020 compared to the entire SCAG region. Over this period Villa Park had an annual growth rate of -0.2% compared to 0.7% for the region.

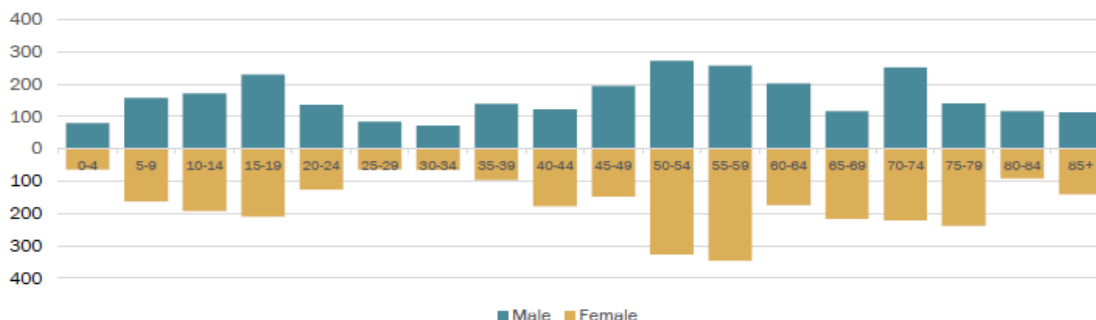
Figure IV-1 Population Trends: 2000 – 2020, Villa Park and SCAG Region



CA DOF E-5 Population and Housing Unit Estimates

According to recent Census estimates the population of Villa Park is 48.2% male and 51.8% female. The share of the population of Villa Park which is under 18 years of age is 19.1%, which is lower than the regional share of 23.4%. Villa Park’s seniors (65 and above) make up 27.8% of the population, which is higher than the regional share of 13% (Figure IV-2).

Figure IV-2 Current Population by Age and Sex, Villa Park



American Community Survey 2014-2018 5-year estimates

2 HCD letter to SCAG dated August 27, 2020: https://scag.ca.gov/sites/main/files/file-attachments/hcd_precertified_localhousingdata_letter082720.pdf?1602114715

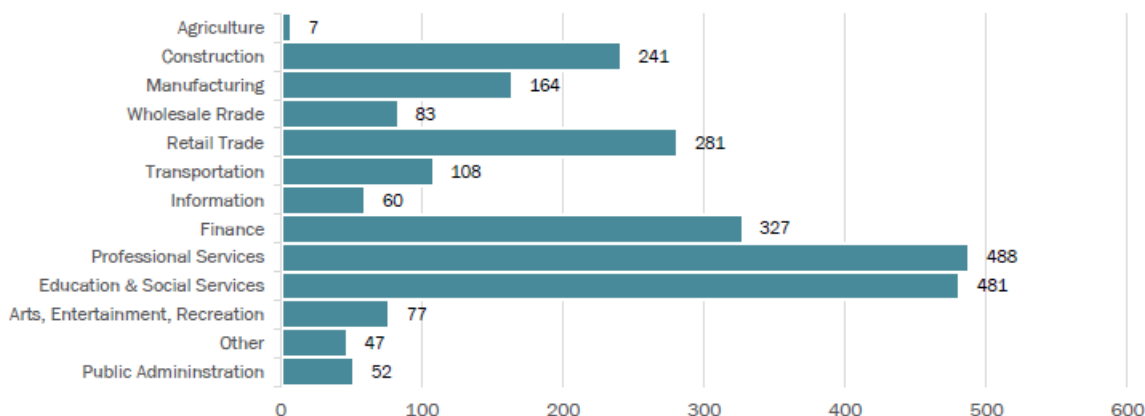
B. Employment

Villa Park is a small, primarily residential community surrounded by the City of Orange. Because the City is mostly “built-out” there is little opportunity for commercial and employment growth. It is assumed that the City exports a majority of its workforce to the larger nearby communities of Orange, Anaheim, Santa Ana, Irvine, and points beyond. The City currently has one 10-acre neighborhood-oriented shopping center comprised of approximately 60,000 square feet of retail/professional space. The shopping center is also the site of City Hall and the Villa Park branch of the Orange County Public Library.

Currently, the largest employer within Villa Park is the Orange Unified School District. The School District operates four schools within the city including two elementary schools, a middle school and a high school. In addition to jobs located in the City’s sole commercial district, many home-based businesses are located in Villa Park.

Recent Census data reported that Villa Park has 2,416 workers living within its borders who work across 13 major industrial sectors. Figure IV-3 below provides detailed employment information. The most prevalent industry is Professional Services with 488 employees (20.2% of total) and the second most prevalent industry is Education & Social Services with 481 employees (19.9% of total).

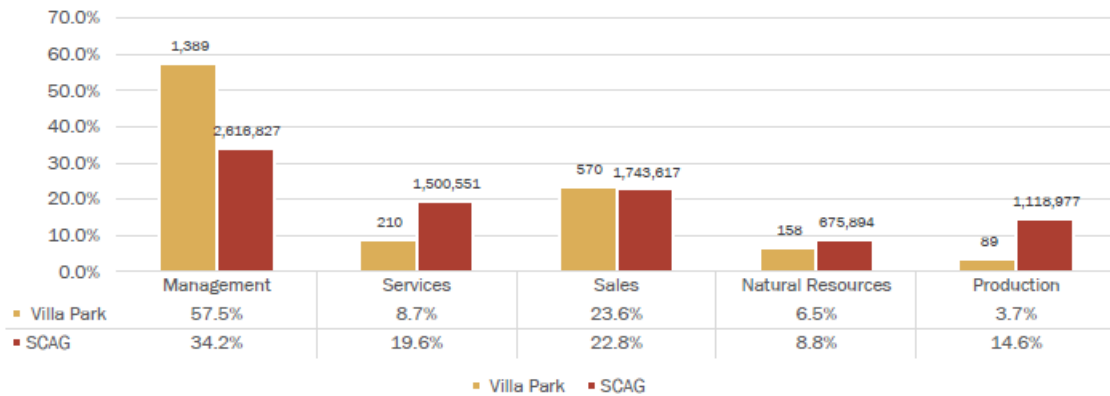
Figure IV-3 Employment by Industry, Villa Park



American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes.

In addition to the industries in which the residents of Villa Park work, Figure IV-4 shows that the most prevalent occupational category in Villa Park is Management, in which 1,389 (57.5% of total) employees work. The second-most prevalent type of work is in Sales, which employs 570 (23.6% of total) in Villa Park.

Figure IV-4 Employment by Occupation, Villa Park and SCAG Region



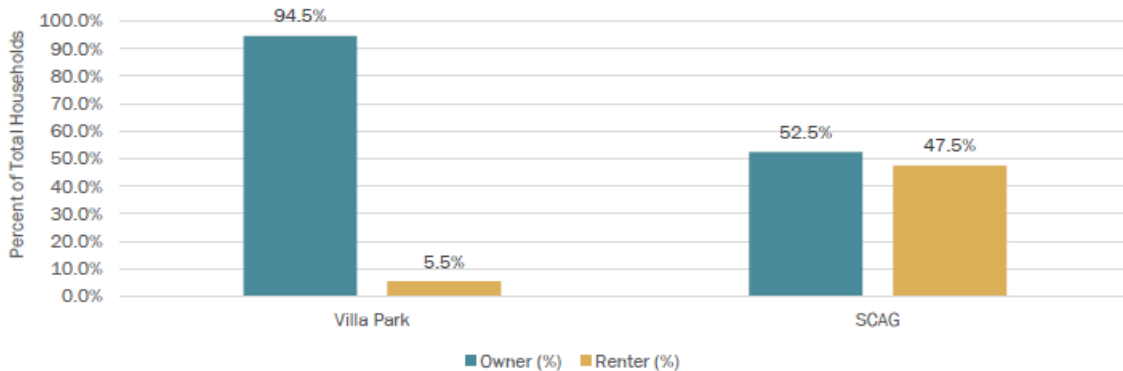
American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

C. Household Characteristics

Tenure

Housing security can depend heavily on housing tenure – i.e., whether homes are owned or rented. Villa Park's housing stock consists of 1,993 total units, 1,884 (94.5%) of which are owner-occupied and 109 (5.5%) of which are renter-occupied. The share of renters in Villa Park is much lower than in the SCAG region overall (Figure IV-5)

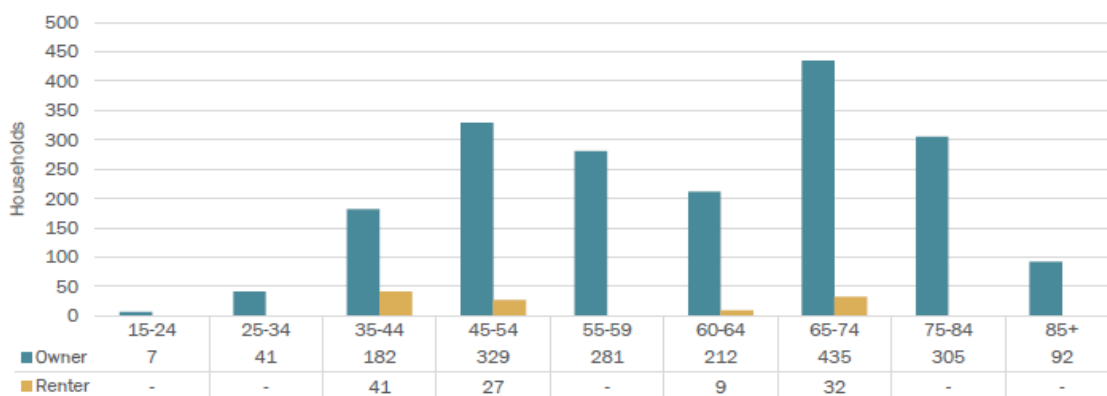
Figure IV-5 Housing Tenure, Villa Park and SCAG Region



American Community Survey 2014-2018 5-year estimates.

In many places, housing tenure varies substantially based on the age of the householder. In Villa Park, owners outnumber renters by a wide margin in all age groups (Figure IV-6).

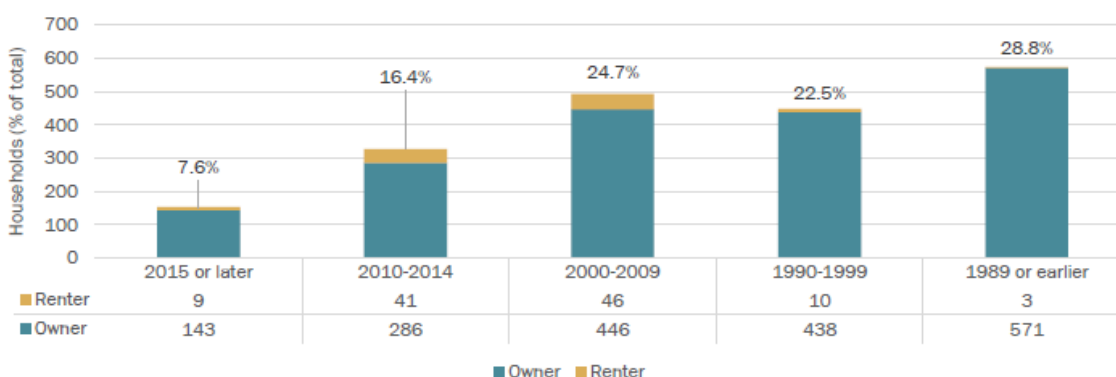
Figure IV-6 Housing Tenure by Age, Villa Park



American Community Survey 2014-2018 5-year estimates.

Across the SCAG region, the most common move-in period was 2010-2014 (31.9%) followed by 2000-2009 (26.1%). As seen in Figure IV-7, the period during which most people started living in their current residence in Villa Park was 1989 or earlier (28.8%) followed by 2000-2009 (24.7%).

Figure IV-7 Housing Tenure by Year Moved to Current Residence, Villa Park

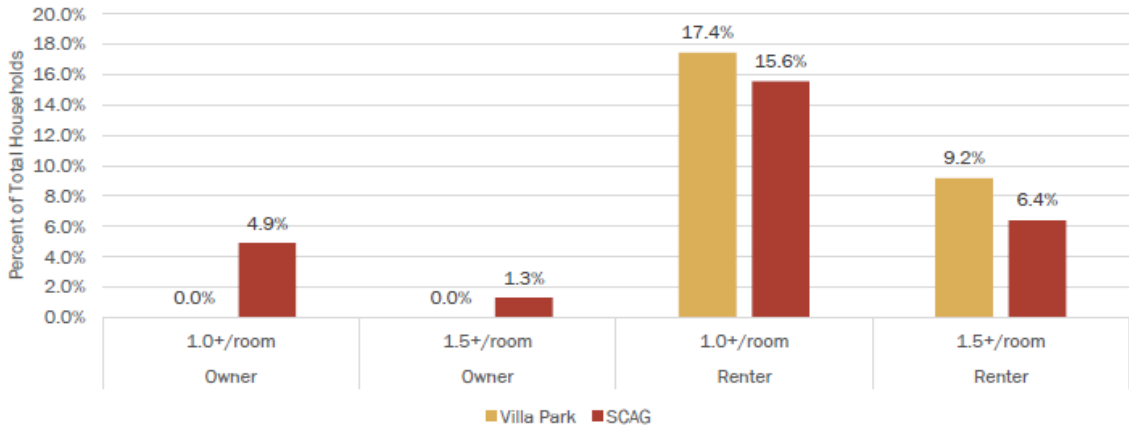


American Community Survey 2014-2018 5-year estimates.

Overcrowding

An overcrowded household is defined by the Census Bureau as more than one person per room, excluding bathrooms, kitchens, hallways, and porches. A severely overcrowded household is defined as more than 1.5 persons per room. Overcrowding can result from a lack of affordable housing and/or a lack of available housing units of adequate size. Figure IV-8 summarizes overcrowding by tenure for the City of Villa Park compared to the SCAG region. According to recent Census estimates, overcrowding was more prevalent among renters than owners. No owner-occupied housing in Villa Park was reported to be overcrowded, although approximately 17.4% of the City’s renter-occupied households were overcrowded and 9.2% were severely overcrowded.

Figure IV-8 Overcrowding by Tenure, Villa Park and SCAG Region



American Community Survey 2014-2018 5-year estimates.

Income and Overpayment

Household income is a primary factor affecting housing needs in a community – the ability of residents to afford housing is directly related to household income. While upper-income households have more discretionary income to spend on housing, lower- and moderate-income households are more limited in the range of housing they can afford. Typically, as household income decreases, the incidence of overpayment and overcrowding increases.

The following income categories are used in Housing Element analyses:

- **Extremely-low-income households** earn 30% or less of the area (i.e., countywide) median income (AMI), adjusted for household size;
- **Very-low-income households** earn between 31% and 50% of AMI, adjusted for household size;
- **Low-income households** earn between 51% and 80% of AMI, adjusted for household size;
- **Moderate-income households** earn between 81% and 120% of AMI, adjusted for household size; and,
- **Above-moderate-income households** earn over 120% of AMI, adjusted for household size.

State and federal standards consider a household to be overpaying for housing (also referred to as *cost-burdened*) if more than 30% of its gross income is spent on housing. A household spending more than this amount for housing has less money available for other necessities and emergency expenditures. Extremely-low-income and very-low-income households overpaying for housing are more likely to be at risk of becoming homeless than other households. Renter households typically overpay more often than owner households because of their lower incomes. Compared to renters, overpayment by owners is generally less of a concern because homeowners may have options such as refinancing a mortgage when interest rates drop, or selling the house and moving into a rental unit or buying a less expensive home.

Recent ~~Census-HUD~~ estimates for overpayment by income category are shown in Figure IV-9. Overpayment among renters was most prevalent in the ~~extremely-low- and very-low-income~~ moderate income category while ~~ies~~ overpayment among owners was most common in the lower-income categories. ~~Approximately 73% of extremely-low-income households were paying more than 30% of gross income for housing while 55% of very-low-income households were paying more than 30%. By comparison, only 24% of households with incomes above the county median were overpaying.~~

Figure IV-9 Overpayment by Income Category, Villa Park

Households by Share of Income Spent on Housing Cost:			
Income	< 30%	30-50%	> 50%
< 30% HAMFI	28	15	60
30-50% HAMFI	70	24	60
50-80% HAMFI	85	55	74
80-100% HAMFI	83	47	55
> 100% HAMFI	995	260	60
Total Households	1,261	401	309

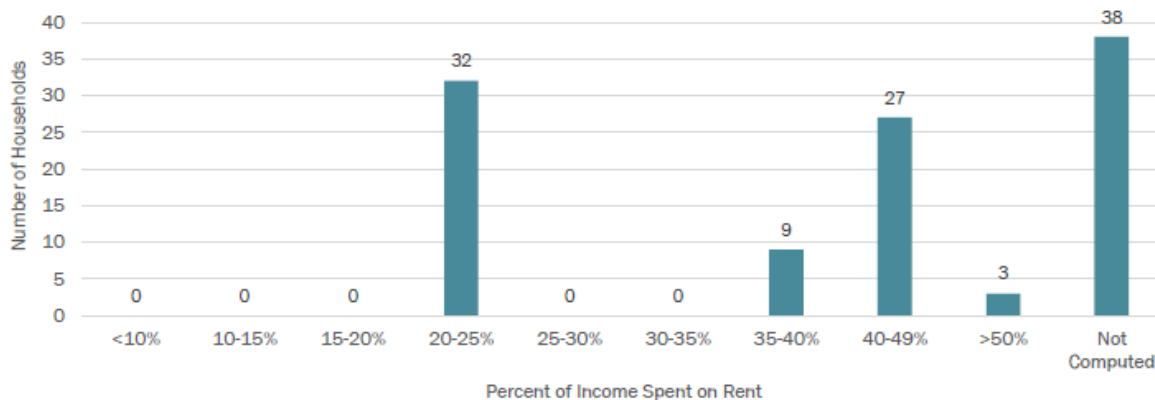
HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI			10
Household Income >30% to less-than or= 50% HAMFI			30
Household Income >50% to less-than or= 80% HAMFI			
Household Income >80% to less-than or= 100% HAMFI	39	4	40
Household Income >100% HAMFI			30
Total	39	4	110
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	80	65	90
Household Income >30% to less-than or= 50% HAMFI	65	35	95
Household Income >50% to less-than or= 80% HAMFI	195	165	265
Household Income >80% to less-than or= 100% HAMFI	25	15	115
Household Income >100% HAMFI	290	55	1,320
Total	655	335	1,885

Source: HUD CHAS based on 2014-2018 Census ACS estimates.

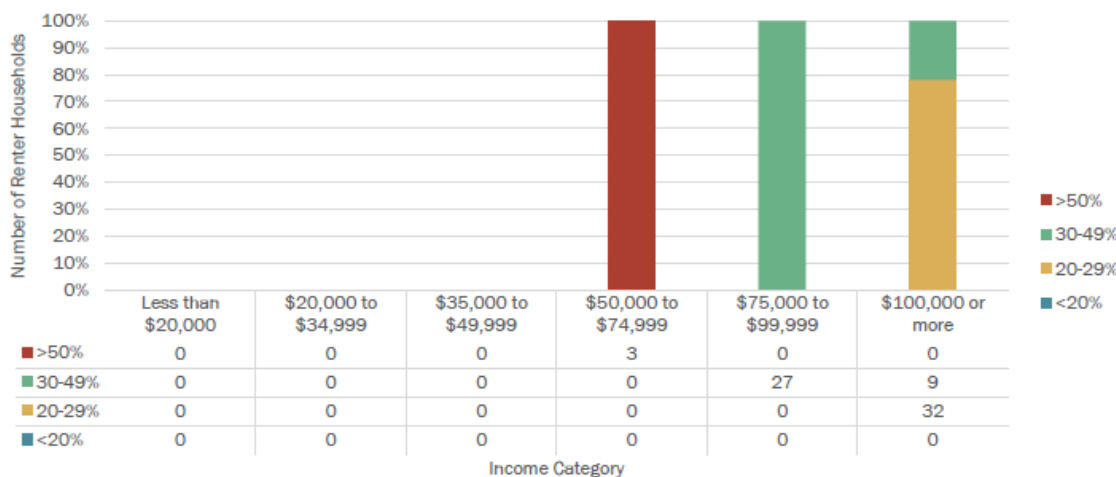
Among Villa Park's 109 renter households, 39 (35.8%) spent 30% or more of gross income on housing cost, compared to 55.3% in the SCAG region. Additionally, 3 renter households in Villa Park (2.8%) spent 50% or more of gross income on housing cost, compared to 28.9% in the SCAG region (Figure IV-10).

Figure IV-10 Percentage of Income Spent on Rent, Villa Park



While the previous table breaks down cost burden by area-relative income, Figure IV-11 shows an analysis of Villa Park's 71 renter households (for which income data are available) by spending on rent by income bracket. As one might expect, the general trend is that lower-income households spend a higher share of income on housing while high-income households are more likely to spend less than 20% of income on housing.

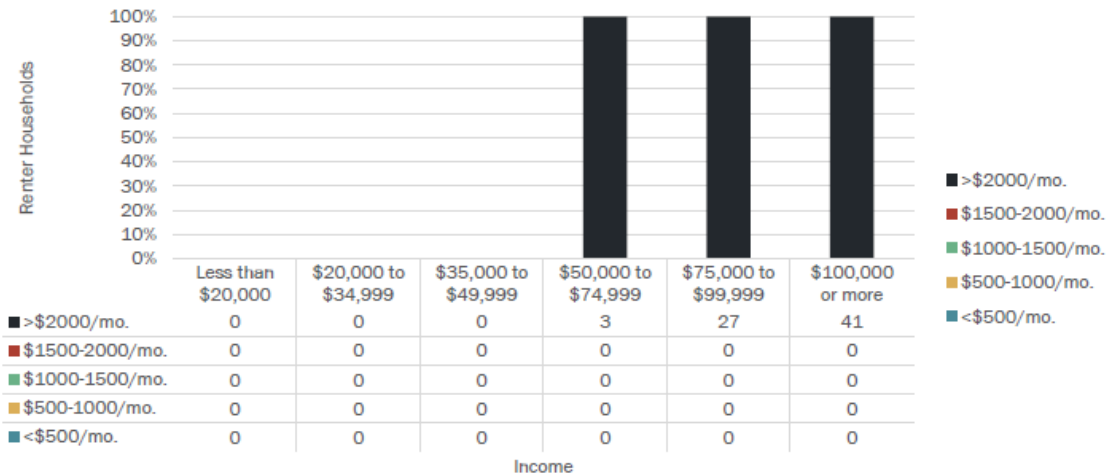
Figure IV-11 Percentage of Income Spent on Rent by Income Category, Villa Park



American Community Survey 2014-2018 5-year estimates.

Villa Park renter households' cash rent paid can be broken down by household incomes. As one might expect, the general trend is that lower-income households spend less on rent while higher-income households spend more on rent, though this may not be universally true. Rent categories range from <\$500/month (0% of Villa Park renters) to >\$2000/month (100% of Villa Park renters). The most common rent category in Villa Park is >\$2000/month with 100% of renters.

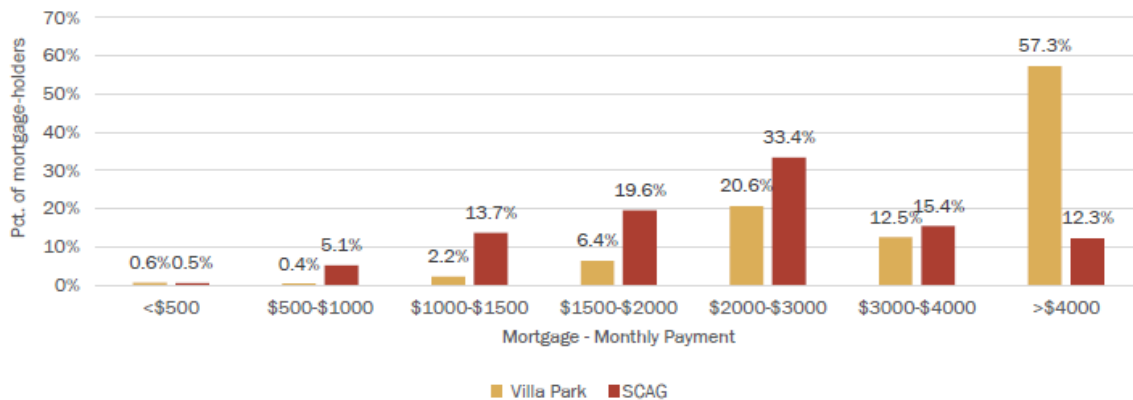
Figure IV-12 Household Income by Rent, Villa Park



American Community Survey 2014-2018 5-year estimates.

While renter households receive much of the focus when it comes to housing cost analysis, owner households make up 94.5% of Villa Park and 52.5% of the SCAG region. The most commonly occurring mortgage payment in Villa Park is >\$4000/month and the most commonly occurring mortgage payment in the SCAG region is \$2000-\$3000/mo. (Figure IV-13).

Figure IV-13 Monthly Owner Costs for Mortgage Holders, Villa Park and SCAG Region



American Community Survey 2014-2018 5-year estimates.

Mortgage-holding households in Villa Park can be broken down by income and the percentage of income spent on mortgage costs. As one might expect, the general trend is that lower-income households spend a higher share of income on housing costs, while high-income households may spend a lower share of income on housing. As seen in Figure IV-14, the income category most prevalent amongst Villa Park mortgage-holding households is \$75,000 or more (1,017 households) and the most prevalent share of income spent on mortgage costs is over 30% (544 households).

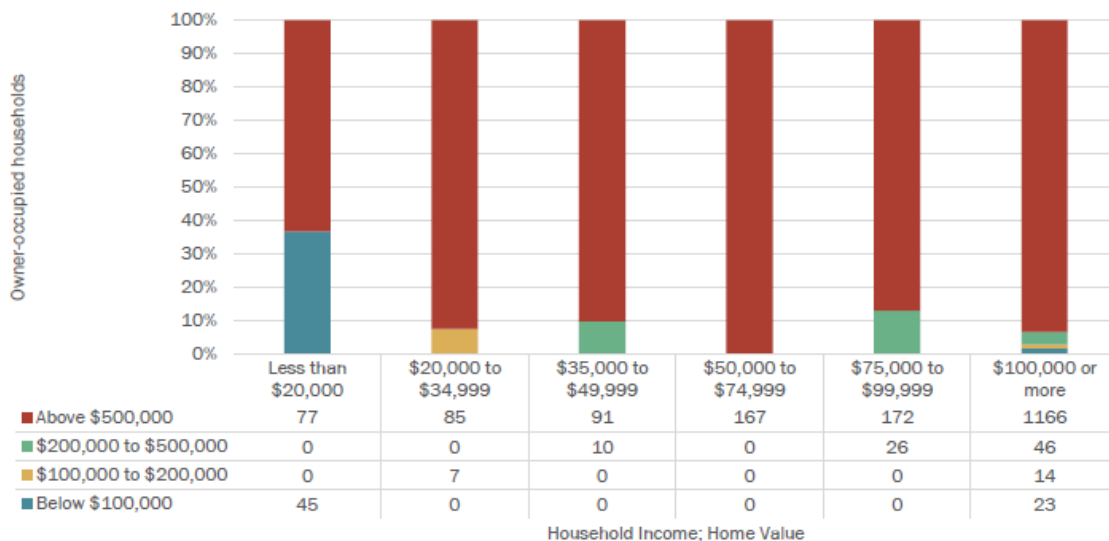
Figure IV-14 Costs for Mortgage Holders by Income, Villa Park



Another approach to evaluating the relationship between housing and income is to compare incomes and home values. As shown in Figure IV-15, the most commonly occurring income category amongst owner households in Villa Park is \$100,000 or more (1,249 households) and the most commonly occurring home value category is Above \$500,000 (1,758 households).

The problems of overpayment are addressed in the Housing Plan through efforts to facilitate production of affordable housing and reduce the cost of housing (see Program 1: Adequate Sites to Accommodate Regional Housing Needs, Program 2: Accessory Dwelling Units, Program 3: Facilitate Housing Development for All Economic Segments of the Community, Program 5: Encourage the Conservation and Maintenance of the City’s Existing Housing Stock, and Program 7: Energy Efficiency.

Figure IV-15 Household Income by Home Value, Villa Park



Extremely-Low-Income Households

Following the passage of AB 2634 in 2006, state law requires quantification and analysis of existing and projected housing needs of extremely-low-income (ELI) households. Extremely-low-income is defined as 30% of less of area median income, adjusted for household size. As of 2020 the area median income in Orange County was \$103,000 for 4-person households. For ELI households, this results in an income of \$38,450 or less.³ ELI households have a variety of housing problems and needs.

Existing Needs

As noted in Figure IV-9, recent Census data estimated that there were 103 ELI households in Villa Park. Of these, 75 (73%) were reported as overpaying for housing.

Projected Needs

Pursuant to State law, the projected housing need for ELI households is assumed to be 50% of Villa Park's very-low-income regional housing need of 93 units. As a result, the City has a projected need for 47 new ELI units during the 2021-2029 planning period. The resources and programs to address this need are the same as for other lower-income housing in general, and are discussed elsewhere in the Housing Element. Because the needs of ELI households overlap extensively with other special needs groups, further analysis and resources for these households can be found in the Special Needs and Constraints sections.

Housing the extremely-low-income population can be especially challenging. Figure IV-16 provides a breakdown of extremely-low-income households by race, ethnicity and tenure. The race/ethnicity with the highest share of extremely-low-income households in Villa Park is Hispanic (18.2% compared to 5.5% of total population). By comparison, in the SCAG region, the highest share of extremely-low-income households is Black, non-Hispanic (27.1% compared to 17.7% of total households).

3 <https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2020.pdf>

Figure IV-16 Extremely-Low-Income Households by Race and Tenure, Villa Park

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	1,508	55	3.6%
Black, non-Hispanic	25	0	0.0%
Asian and other, non-Hispanic	344	34	9.9%
Hispanic	110	20	18.2%
TOTAL	1,987	109	5.5%
Renter-occupied	110	24	21.8%
Owner-occupied	1,880	85	4.5%
TOTAL	1,990	109	5.5%

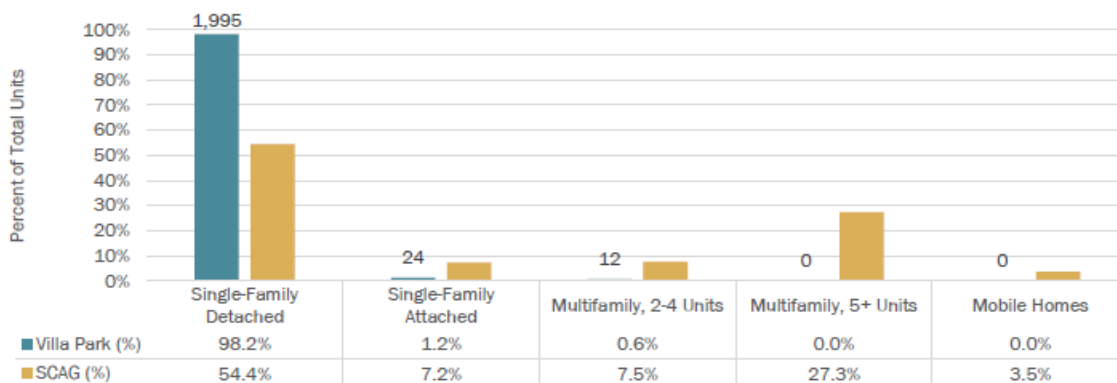
HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

D. Housing Stock Characteristics

Housing Units by Type

Figure IV-17 shows housing stock characteristics in Villa Park. Of the total 2,031 housing units, the most prevalent housing type is single-family detached with 1,995 units (99.4%), which is significantly higher than the 61.7% share of single-family detached units in the SCAG region. It should be noted that development patterns had already been established under County zoning regulations at the time the City was incorporated in 1962.

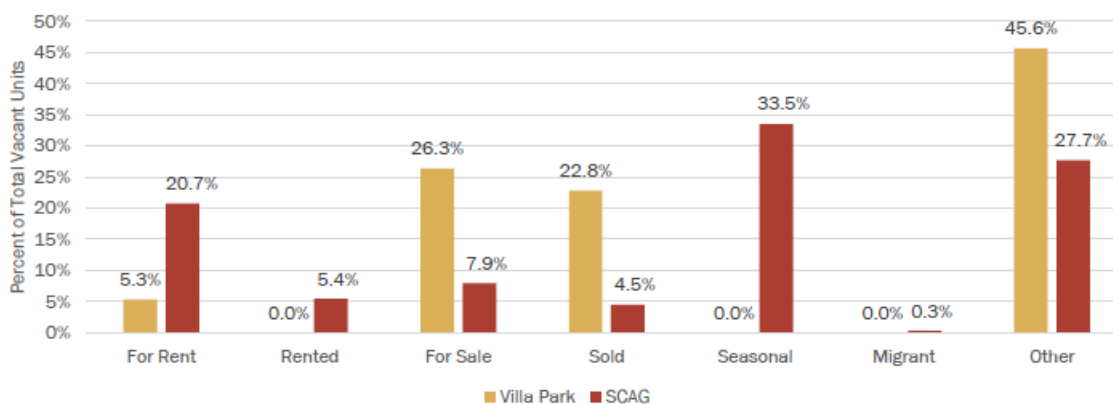
Figure IV-17 Housing Stock Characteristics, Villa Park and SCAG Region



CA DOF E-5 Population and Housing Unit Estimates

Of the 2,031 total housing units in Villa Park, 1,963 were occupied, which equates to a 3.3% vacancy rate. The highest category of vacant units was reported as “other” with 45.6% of all vacant units. Vacant units for sale or sold were 26.3% and 22.8% of units, respectively. Vacant units for rent comprised only 5.3% of all vacant units (Figure IV-18).

Figure IV-18 Vacant Housing Units by Type, Villa Park and SCAG Region

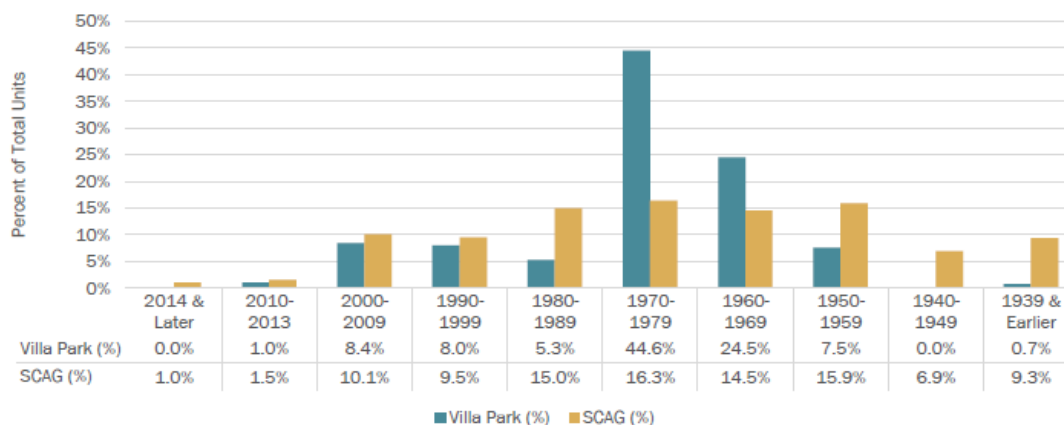


American Community Survey 2014-2018 5-year estimates.

Housing Conditions

The age of housing is sometimes an indicator of potential housing quality problems. According to recent Census estimates, about over three-quarterstwo-thirds of ~~the~~ housing unitssupply in Villa Park has ves been built since 1970 (Figure IV-19).

Figure IV-19 Housing Stock by Year Built, Villa Park and SCAG Region



American Community Survey 2014-2018 5-year estimates.

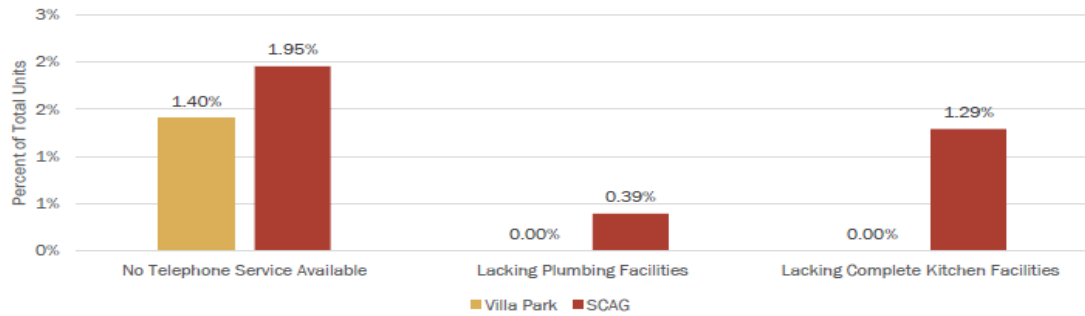
The following definitions of substandard housing are commonly used in housing needs analysis:

- *Deteriorating* – not more than two intermediate (slight) defects or one major defect but still providing safe and adequate shelter.
- *Dilapidated* – several intermediate defects or a critical defect plus extensive evidence of neglect or serious damage.

Housing units that are classified as deteriorating generally are considered amendable to some degree of rehabilitation. Dilapidated housing, however, is in such a state of disrepair that rehabilitation may no longer be economically feasible and the unit should be replaced.

As an indicator of housing conditions, the Census Bureau collects data regarding whether housing units have telephone service, plumbing facilities and complete kitchen facilities (Figure IV-20). No housing units in Villa Park were reported as lacking plumbing facilities or complete kitchen facilities; however, 28 units (1.4%) reported no telephone service. Given the widespread use of cell phones, it is likely that lack of telephone service is not a reliable indicator of substandard housing conditions as more households have found that “landline” telephone service may no longer be necessary.

Figure IV-20 Substandard Housing Indicators, Villa Park and SCAG Region



American Community Survey 2014-2018 5-year estimates.

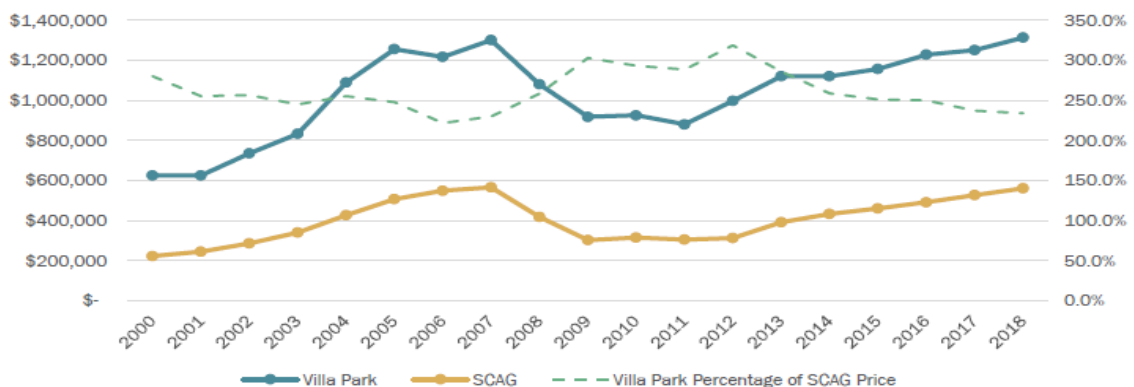
Considering the high home values and community pride in Villa Park, substandard housing conditions are uncommon. When considering historical maintenance of existing housing during the program period, it is believed that there are no housing units with substandard conditions that would require the replacement of the housing unit. City staff estimates that about 20 housing units, or approximately 1%, may be in need of some type of rehabilitation.

Housing Costs and Affordability

Home Price Trends

Median home price data for Villa Park as compared to the SCAG region are shown in Figure IV-21. Between 2000 and 2018, median home sales prices in Villa Park increased 110% while prices in the SCAG region increased 151%. 2018 median home sales prices in Villa Park were approximately \$1.3 million.

Figure IV-21 Median Housing Prices, Villa Park and SCAG Region



SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians.

Rental Prices

There are no multi-family units in Villa Park; therefore, all rental units are individually-owned single-family units. An internet search⁴ discovered two single-family homes offered for rent at prices ranging from \$4,700 to \$4,800 per month.

Affordability Gap Analysis

The costs of home ownership and renting can be compared to a household’s ability to pay for housing. Housing affordability is defined as paying no more than 30% of the household income on housing expenses. Figure IV-22 summarizes affordable rents and purchase prices by income category based on the 2020 median income of \$103,000 for Orange County.

Figure IV-22 Income Categories and Affordable Housing Costs, Orange County

2020 County Median Income = \$103,000	Annual Income Limits	Affordable Monthly Rent	Affordable Price (est.)
Extremely Low (<30%)	\$38,450	\$961	(1)
Very Low (31-50%)	\$64,050	\$1,601	(1)
Low (51-80%)	\$102,450	\$2,562	(1)
Moderate (81-120%)	\$123,600	\$3,090	\$500,000
Above moderate (120%+)	Over \$123,600	Over \$3,090	Over \$500,000

Assumptions:
 -Based on a family of 4 and 2020 State income limits
 -30% of gross income for rent or Principal/Interest/Taxes/Insurance
 -5% down payment, 4% interest, 1.25% taxes & insurance, \$350 HOA dues
 Notes:
 (1) For-sale affordable housing is typically at the moderate income level
 Sources: Cal. HCD; JHD Planning LLC

Based on recent sales and rental market data, it is unlikely that low- and moderate-income income households can find affordable housing in Villa Park except in accessory dwelling units (ADUs).

E. Special Housing Needs

State law identifies six groups that are considered to have special housing needs: the elderly; large households; female-headed households; persons with disabilities, including developmental disabilities; homeless persons in need of emergency shelter; and farm workers. These groups are discussed below, while City regulations for suitable types of housing to serve their needs are analyzed in the Constraints section.

Elderly Persons

Federal housing data define a household type as *elderly family* if it consists of two persons with either or both age 62 or over. Elderly persons are considered a special needs group because they are more likely to have fixed incomes and often have special needs related to housing location and construction. Because of limited mobility, elderly persons may need convenient access to services (e.g., medical and shopping) and public transit. Of Villa Park's 823 elderly

4 Zillow.com and Rent.com, accessed 11/16/2020

households, 6% earned less than 30% of the countywide median income, (compared to 24.2% in the SCAG region), while 19.9% earned less than 50% of the median income (compared to 30.9% in the SCAG region). (Figure IV-23).

Figure IV-23 Elderly Households by Income and Tenure, Villa Park

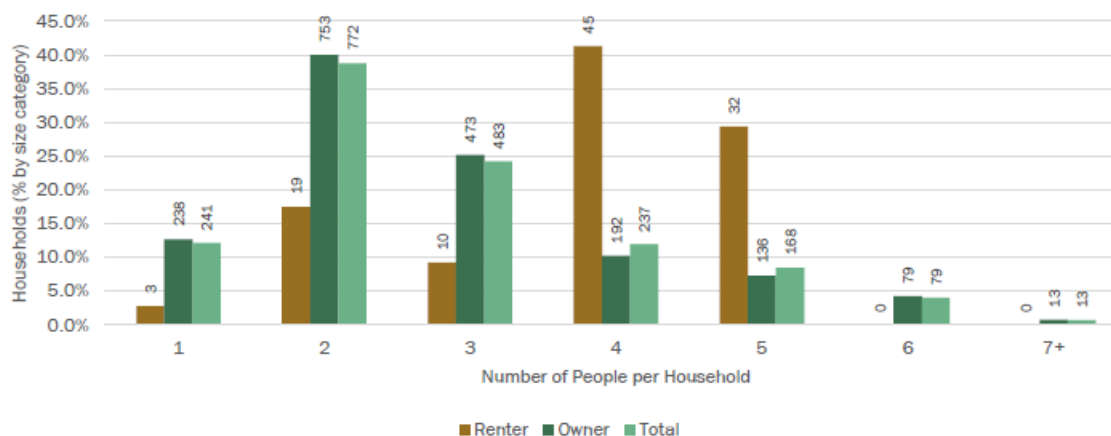
		Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:	< 30% HAMFI	45	4	49	6.0%
	30-50% HAMFI	95	20	115	14.0%
	50-80% HAMFI	135	4	139	16.9%
	80-100% HAMFI	85	0	85	10.3%
	> 100% HAMFI	435	0	435	52.9%
TOTAL		795	28	823	

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Large Households

Large households are defined as having five or more persons living within the same housing unit. Large households are considered a special needs group because they require more space and more bedrooms. Figure IV-24 illustrates the range of household sizes in Villa Park for owners, renters, and overall. The most commonly occurring household size is of two people (38.7%) while the second-most commonly occurring household is three people (24.2%). Villa Park has a lower share of single-person households than the SCAG region overall (12.1% vs. 23.4%) and a lower share of 7+ person households than the SCAG region overall (0.7% vs. 3.1%).

Figure IV-24 Household Size by Tenure, Villa Park



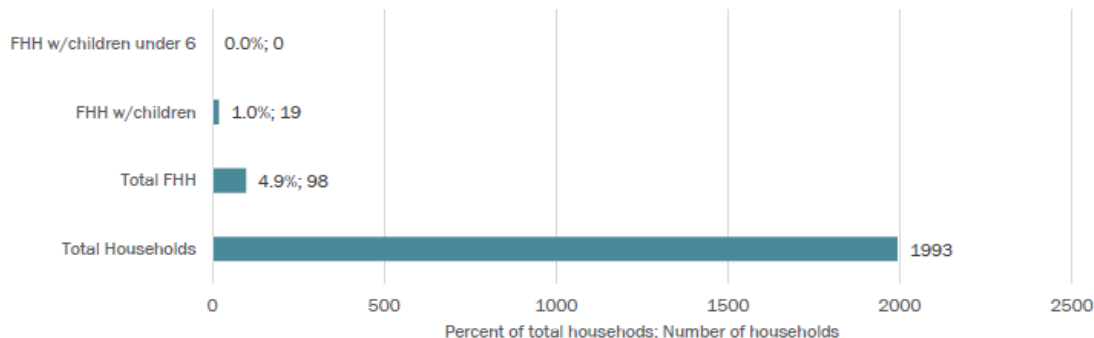
American Community Survey 2014-2018 5-year estimates.

Female-Headed Households

Female-headed households are a special needs group due to comparatively low rates of homeownership, lower incomes, and higher poverty rates experienced by this group. Of Villa Park's 1,993 total households, 4.9% are female-headed (compared to 14.3% in the SCAG

region), 1% are female-headed and with children (compared to 6.6% in the SCAG region), and no female-headed households were reported with children under 6 (compared to 1.0% in the SCAG region) (Figure IV-25).

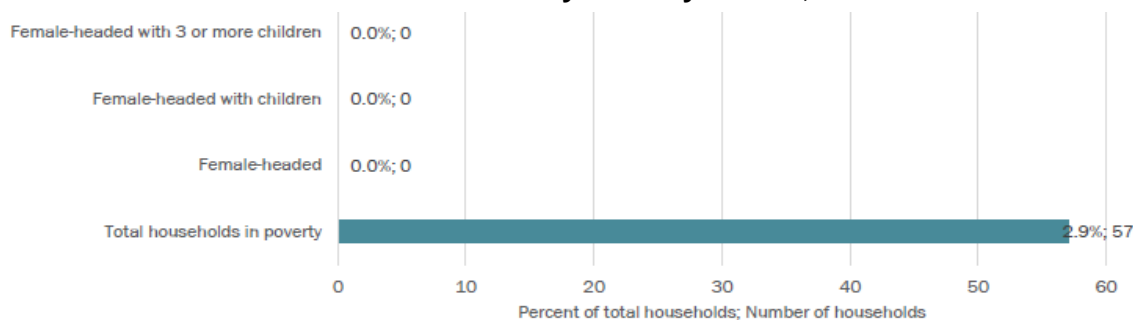
Figure IV-25 Female Headed Households, Villa Park



American Community Survey 2014-2018 5-year estimates.

Poverty thresholds, as defined by the ACS, vary by household type. In 2018, single individuals under 65 were considered to be in poverty if their income was below \$13,064/year while the threshold for a family consisting of 2 adults and 2 children was \$25,465/year. Approximately 2.9% of Villa Park's households were reported to be experiencing poverty, compared to 7.9% of households in the SCAG region. Of the 57 households reported to be below the poverty level in Villa Park, none was identified as a female-headed household (Figure IV-26).

Figure IV-26 Female-Headed Households by Poverty Status, Villa Park



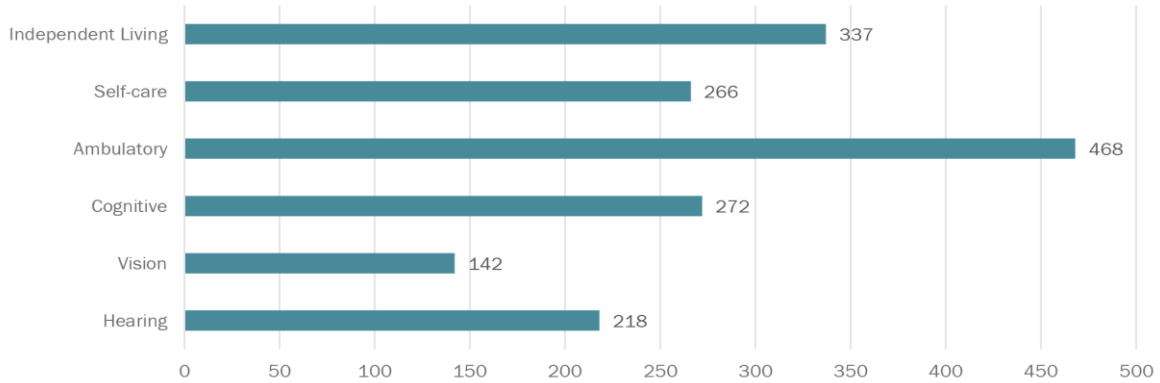
American Community Survey 2014-2018 5-year estimates.

Persons with Disabilities

Access and affordability are the two major housing needs for persons with disabilities. This often requires specially designed dwelling units, and disability data provides valuable context for assessing current and future need for accessible housing units. Additionally, locating housing near public facilities and public transit is important for this special needs group. Figure IV-27 shows recent Census estimates of disabilities among all Villa Park residents while Figure IV-28 shows disability estimates only for the senior population. Note that since some disability types are not recorded for children below a certain age, calculating disability as a percentage of total population may not be possible. In Villa Park, the most commonly occurring disability among seniors 65 and older was an ambulatory disability, experienced by 19.4% of Villa Park's seniors as compared to 22.9% of seniors in the SCAG region. Housing opportunities for those with

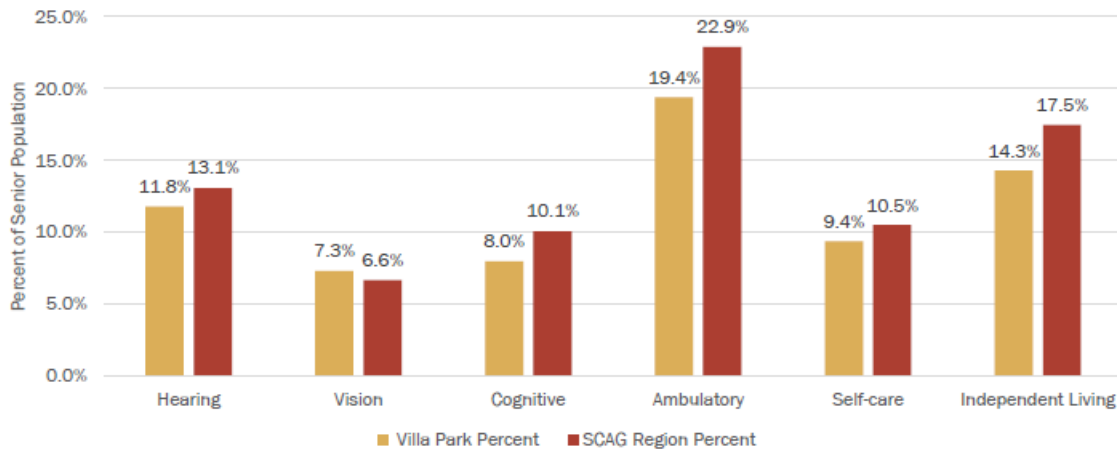
disabilities can be improved through housing assistance programs and by providing universal design features such as widened doorways, ramps, lowered countertops, single-level units and ground floor units.

Figure IV-27 Disabilities by Type, Villa Park



American Community Survey 2014-2018 5-year estimates.

Figure IV-28 Disabilities by Type – Seniors Age 65+, Villa Park and SCAG Region



American Community Survey 2014-2018 5-year estimates.

Understanding the employment status of people with disabilities is also an important consideration in evaluating specialized housing needs. In Villa Park, 18.1% of the population with a disability is employed, compared to 70.1% of the non-disabled population (Figure IV-29).

Figure IV-29 Disabilities by Employment Status, Villa Park

	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	38	18%	2,049	70%
Unemployed	18	9%	123	4%
Not in Labor Force	154	73%	752	26%
TOTAL	210		2,924	

American Community Survey 2014-2018 5-year estimates.

Developmental Disabilities

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 Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5%. Many persons with developmental disabilities can live and work independently within a conventional housing environment. More severely affected individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for those with developmental disabilities is the transition from the person’s living situation as a child to an appropriate level of independence as an adult.

The California Department of Developmental Services (DDS) currently provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. The Regional Center of Orange County (RCOC) provides point of entry to services for people with developmental disabilities in Orange County. 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.

Any resident of Orange County who has a developmental disability that originated before age 18 is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans 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. 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. The RCOC currently serves approximately 22,000 residents with developmental disabilities and their families.⁵

The mission of the Dayle McIntosh Center is to advance the empowerment, equality, integration and full participation of people with disabilities in the community. The Center is not a residential program, but instead promotes the full integration of disabled persons into the community. Dayle McIntosh Center is a consumer-driven organization serving all disabilities. Its staff and board are composed of over 50% of people with disabilities. Its two offices service over 500,000 people in Orange County and surrounding areas with disabilities. The Center’s main office is located in Garden Grove, approximately 5 miles to the west of Villa Park.

The California DDS provides data on developmental disabilities by age and type of residence. These data are collected at the ZIP-code level and were joined to the jurisdiction-level by SCAG. Totals may not match as counts below 11 individuals are unavailable and some entries were not matched to a ZIP code necessitating approximation. According to DDS data there were approximately 869 persons with developmental disabilities in Villa Park.

Figure IV-30 Developmental Disabilities by Residence and Age, Villa Park

	Villa Park
By Residence: Home of Parent/Family/Guardian	293
Independent/Supported Living	16
Community Care Facility	35
Intermediate Care Facility	5
Foster/Family Home	5
Other	0
By Age: 0 - 17 Years	354
18+ Years	161
TOTAL	869

CA DDS consumer count by CA ZIP, age group and residence type for the end of June 2019. Data available in 161/197 SCAG jurisdictions.

Homeless Population

According to the 2019 “Point-in-Time” survey of the homeless population there were no homeless persons reported in Villa Park. Senate Bill (SB) 2 of 2007 requires that jurisdictions quantify the need for emergency shelter and determine whether existing facilities are adequate to serve the need. An emergency shelter is defined as “housing with minimal supportive services

⁵ <https://www.rcocdd.com/>

for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay.” If adequate existing facilities are not available, the law requires jurisdictions to identify areas where new facilities are permitted “by-right” (i.e., without requiring discretionary approval such as a use permit). As noted in the Constraints section, the City’s Zoning Code allows emergency shelters in the E-4 and R-1 zones by-right in compliance with SB 2, and Program 4 includes a Code amendment to facilitate low barrier navigation centers and supportive housing consistent with recent changes to State law.

In order to facilitate production of new facilities serving the homeless, during 2019-2020 Villa Park participated in a consortium of agencies to establish two new navigation centers serving the homeless in northern Orange County. A regional partnership of 13 cities located in northern Orange County (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park, and Yorba Linda) worked cooperatively to share intelligence and resources to address regional homelessness and promote greater regional coordination on homeless issues.

After months of extensive discussions, negotiations and assessments, two locations in the North Orange County Service Planning Area were identified for the development of navigation centers based on a number of factors including proximity to related services and site availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to a shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in the city of Anaheim that accommodated 325 new beds.

Funding for the navigation centers was secured through \$12 million in State Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of the navigation centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing operation of the navigation centers. A Memorandum of Understanding was approved by the city councils of all 13 cities in May 2019 with the opening of the first 100-bed Navigation Center in Placentia on March 31, 2020.

Farmworkers

Statewide, farmworker housing is of unique concern and importance. While only a small share of SCAG region jurisdictions have a significant number of farmworkers living in them, they are essential to the region’s economy and food supply. In the past, farm workers were housed at the Villa Park Orchard Association’s facility, which no longer exists. Three small-scale wholesale nurseries currently occupy approximately 5 acres under power line easements within the City. There currently are no orchards, row crops or other similar agricultural operations located in the City that would employ farm workers. As shown in Figure IV-31 and Figure IV-32, recent Census data reported no farmworkers and only 7 persons in Villa Park who were employed in the agricultural industry. To address the housing needs of any farmworkers who may wish to reside in Villa Park, Program 4 is included in the Housing Plan to ensure that employee housing for up to six workers is allowed as a residential use in conformance with the Employee Housing Act.

Figure IV-31 Farmworkers by Occupation, Villa Park

Villa Park	Percent of total Villa Park workers:	SCAG Total	
0	0.00%	57,741	Total jobs: Farming, fishing, and forestry occupations
0	0.00%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations

American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

Figure IV-32 Employment in the Agricultural Industry, Villa Park

Villa Park	Percent of total Villa Park workers:	SCAG Total	
7	0.29%	73,778	Total in agriculture, forestry, fishing, and hunting
7	0.43%	44,979	Full-time, year-round in agriculture, forestry, fishing, and hunting

American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

F. Analysis of Assisted Housing at Risk of Conversion to Market Rate Housing

All housing in Villa Park is comprised of detached single-family units that have been privately built and financed. Accessory dwelling units may provide affordable housing, but none of those is assisted with housing subsidies. There are no assisted units in the city, and no affordable units are at risk of conversion to market rate housing.

G. Regional Housing Need Assessment (RHNA)

The Southern California Association of Governments (SCAG) is responsible for allocating housing growth needs to each jurisdiction in its region. A local jurisdiction’s share of regional housing need is the number of additional housing units needed to accommodate projected household growth, to replace expected demolitions and conversion of housing units to non-housing uses, to achieve a future vacancy rate that allows for healthy functioning of the housing market, and to address the problems of overcrowding and overpayment. The allocation is distributed among four income categories (very-low, low, moderate, and above-moderate) and is adjusted to avoid an over-concentration of lower-income households in jurisdictions that currently have a disproportionately high share of low-income residents. Cities must also plan for the growth needs of extremely-low-income (ELI) households. The ELI need is assumed to be 50% of the very-low-income allocation.

Figure IV-33 shows the RHNA allocation for the City of Villa Park during the 2021-2029 planning period.

Figure IV-33 RHNA Allocation 2021-2029, Villa Park

	Very Low (Extremely Low*)	Low	Moderate	Above Moderate	Total
Housing Units	93 (47)	60	61	82	296

Notes:

*Extremely Low-Income need is assumed to be 50% of Very Low-Income need

Source: SCAG 2021

H. ~~Affirmatively Furthering Fair Housing (AFFH)~~

~~Assembly Bill (AB) 686 requires that all housing elements contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.~~

~~Under State law, affirmatively further fair housing means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”~~

~~There are three parts to this requirement:~~

- ~~1. Include a Program that Affirmatively Furthers Fair Housing and Promotes Housing Opportunities throughout the Community for Protected Classes (applies to housing elements beginning January 1, 2019).~~
- ~~2. Conduct an Assessment of Fair Housing that includes summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify, and an assessment of the contributing factors for the fair housing issues.~~
- ~~3. Prepare the Housing Element Land Inventory and Identification of Sites through the Lens of Affirmatively Furthering Fair Housing.~~

~~In compliance with AB 686, the City has completed the following outreach and analysis.~~

~~Outreach~~

~~As discussed in Appendix C, the City held a total of six public meetings during the Housing Element update in an effort to encourage participation by all segments of the community. Each meeting was publicized on the City’s website and meeting notices were also sent to persons and organizations with expertise in affordable housing and supportive services. Interested parties had the opportunity to interact with City staff throughout the Housing Element update process and provide direct feedback regarding fair housing issues.~~

~~The City also created a dedicated web page for the Housing Element update (<http://villapark.org/Departments/Planning/Housing-Element>) and provide opportunities for interested persons to participate in public meetings remotely, which made it possible for those with disabilities limiting their travel to participate and comment on the Housing Element regardless of their ability to physically attend the workshop.~~

Assessment of Fair Housing

The following analysis examines geographic data regarding racial segregation, poverty, persons with disabilities, and areas of opportunity as identified by the TCAC/HCD Opportunity Areas map.

Racial segregation. As seen in Figure IV-34, the percentage of non-white population in the city is relatively low compared to most adjacent areas except for the area to the east. There are no apparent concentrations of racial minorities in the city.

Poverty. Recent Census estimates regarding poverty status of households in Villa Park are shown in Figure IV-35. As seen in this map, there are no concentrations of poverty, with the poverty rate less than 10% for all census tracts in the city. The low poverty rate in Villa Park is similar to the adjacent areas to the north, east and south, while the area to the west has a slightly higher poverty rate.

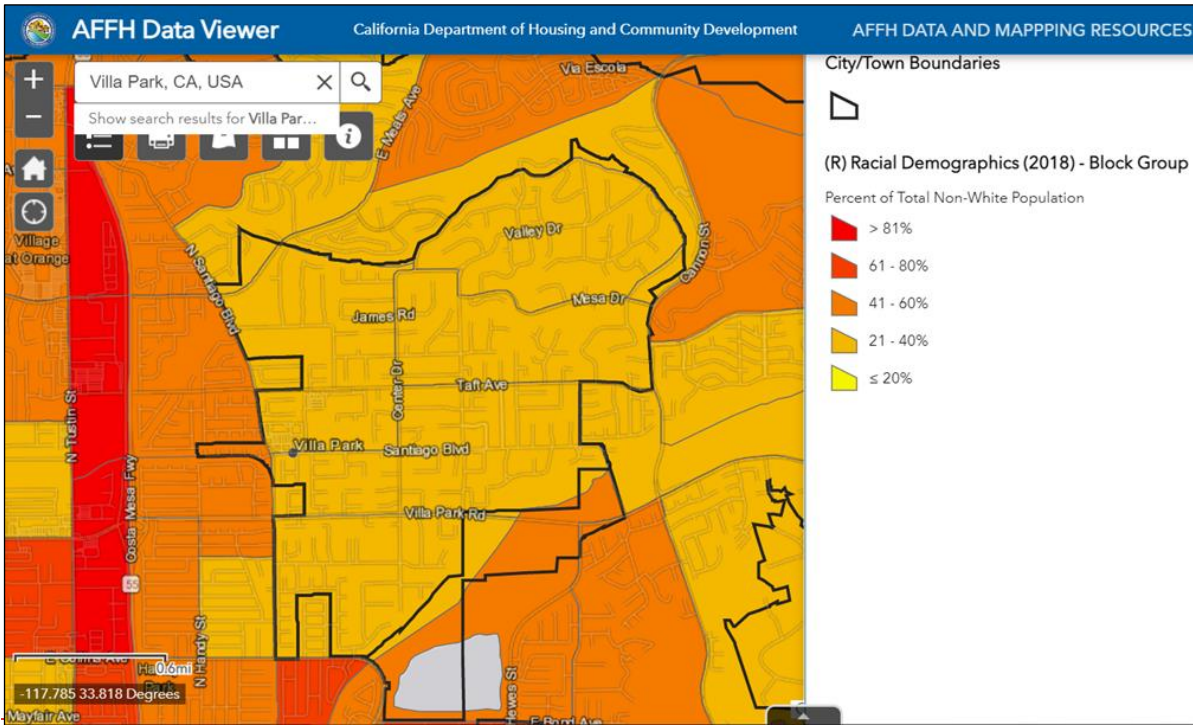
Persons with disabilities. The incidence of disabilities is somewhat higher in Villa Park compared to the surrounding areas. As shown in Figure IV-36, the percentage of Villa Park residents reporting a disability is 10-20%, while the disability rate is less than 10% in the immediately adjacent areas. This is likely related to the higher percentage of elderly residents in Villa Park.

Access to opportunity. According to the 2020 California Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) Opportunity Area Map (Figure IV-37), Villa Park is entirely within designated “High Resource” areas. High Resource areas are areas with high index scores for a variety of educational, environmental, and economic indicators. Some of the indicators identified by TCAC include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others.

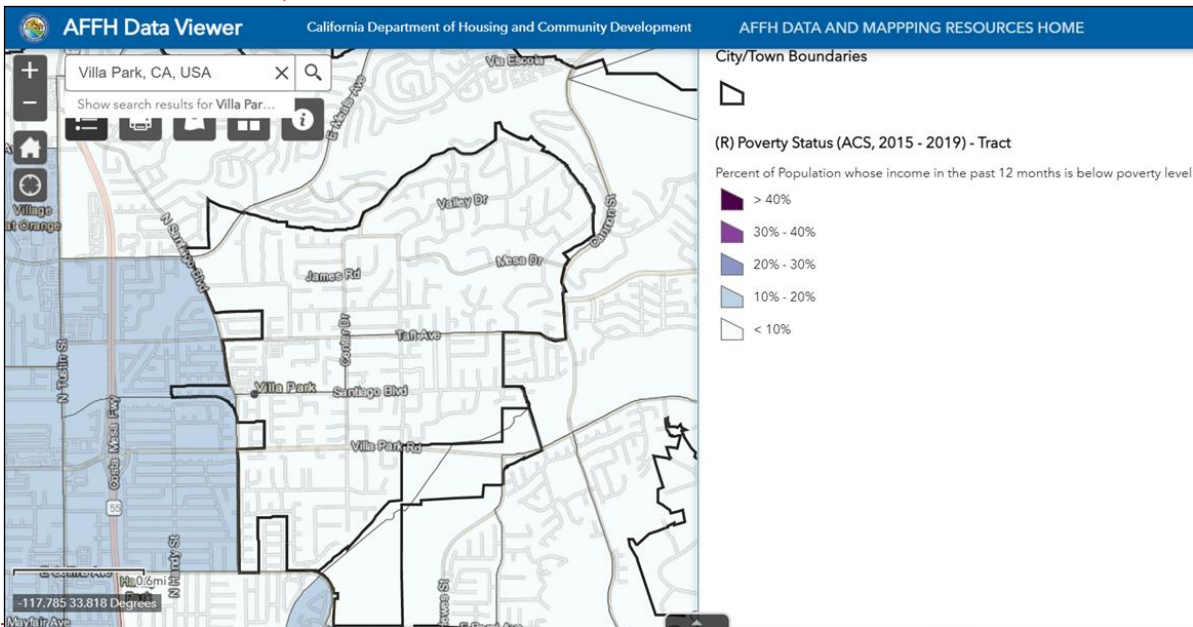
Conclusion

This analysis indicates that the primary barrier to fair housing in the city is high housing cost, which has the effect of limiting access by lower-income households to the high opportunities and resources available in Villa Park. There is no evidence to suggest that discrimination against racial groups or persons with disabilities is a major issue.

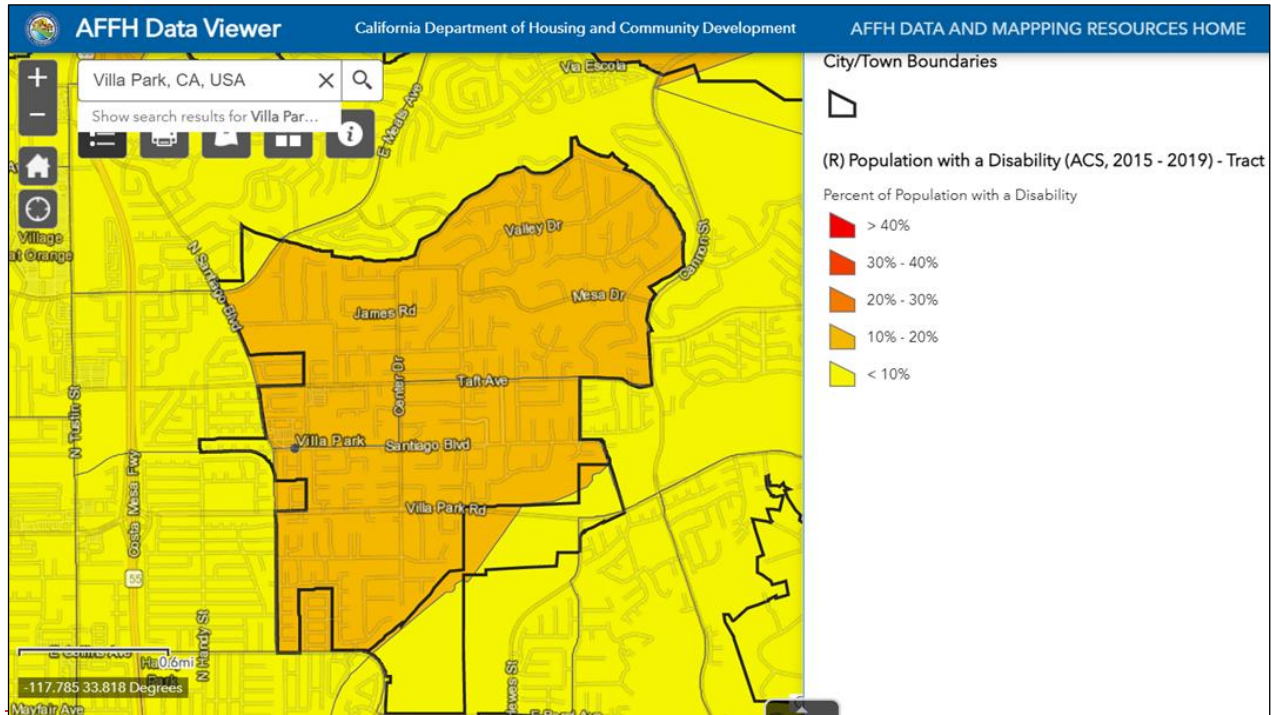
The Housing Plan (Chapter V) includes Program 1 to rezone additional sites for lower income housing, Program 2 to encourage ADUs, Program 3 to facilitate housing development for all economic segments, Program 4 to facilitate the provision of housing for persons with special needs, including developmental disabilities, and Program 6 to affirmatively further fair housing and address any issues of housing discrimination that may arise.



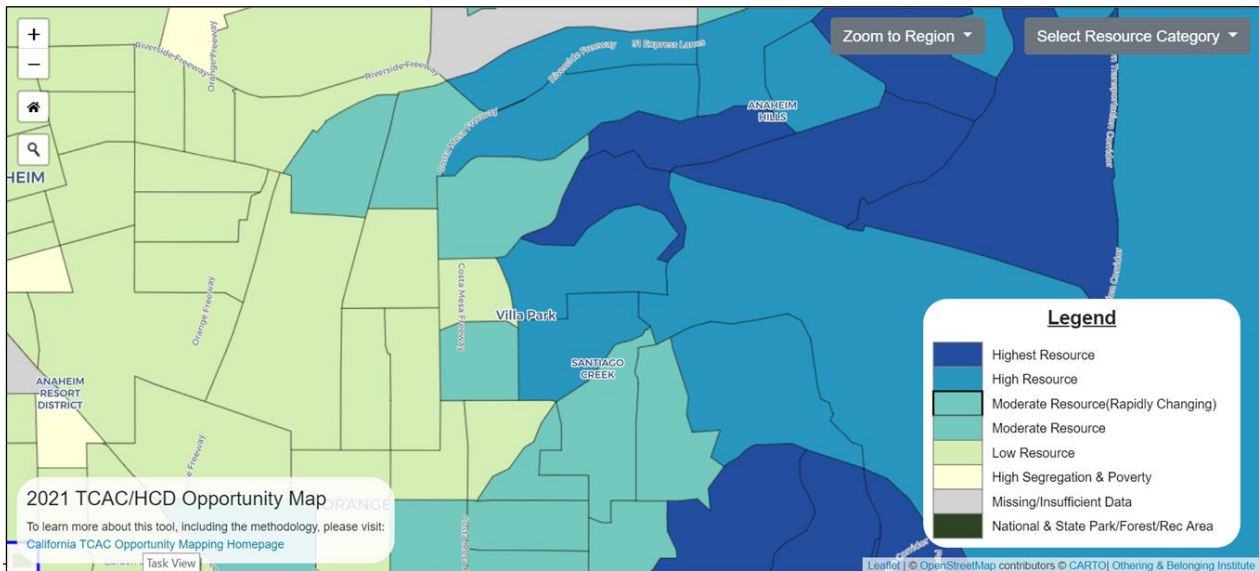
Source: HCD Data Viewer, 2021



Source: HCD Data Viewer, 2021



Source: HCD Data Viewer, 2021



Source: TCAC/HCD Opportunity Map, 2021

III. Housing Resources and Opportunities

This chapter provides a description of the land resources and adequate sites to address the City’s regional housing needs allocation for the 2013-2021 planning period. Additionally, the chapter discusses opportunities for energy conservation that can lower utility costs and increase housing affordability.

A. Land Resources to Accommodate New Housing Needs

California Housing Element law mandates that each city designate adequate sites with appropriate zoning and development standards and with the required public services and facilities to accommodate a range of housing types and prices. This evaluation of adequate sites represents planning goals, not a quota or mandate for production of housing within the planning period. The City must demonstrate that it has the capacity, or adequate sites, to accommodate its need for housing at all income levels assigned through the Regional Housing Needs Assessment.

Regional Housing Needs Assessment

The Southern California Association of Governments (SCAG), in cooperation with local jurisdictions, is responsible for allocating the region’s projected new housing demand in each city. This process is known as the Regional Housing Needs Assessment (RHNA) and the goals are referred to as the regional share goals for new housing construction. The allocation takes into account factors such as market demand for housing, employment opportunities, the availability of suitable sites and public facilities, commuting patterns, projected growth, and existing housing needs such as overpayment and overcrowding. In determining a jurisdiction’s share of new housing needs by income category, the allocation is adjusted to avoid an over-concentration of lower-income households in jurisdictions that already have a disproportionate share of such households. The allocation is divided into five income categories based on Area Median Income (AMI):

Extremely-Low Income:	30% or less of AMI
Very-Low Income:	31 to 50% of AMI
Low Income:	51 to 80% of AMI
Moderate Income:	81 to 120% of AMI
Above-Moderate Income:	Greater than 120% of AMI

The RHNA for the 2021-2029 planning period identifies the City of Villa Park’s share of the region’s housing needs as follows:

Extremely-Low Income:	47 units
Very-Low Income:	46 units
Low Income:	60 units
Moderate Income:	61 units
<u>Above-Moderate Income:</u>	<u>82 units</u>
Total:	296 units

Sites to Accommodate New Housing Needs

State law requires Housing Elements to include an inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. Figure IV-34 summarizes the City's inventory of sites that can accommodate residential development. The table shows that the City's land inventory can fully accommodate housing needs in all income categories for this RHNA period; however, amendments to the General Plan and Municipal Code are necessary to ensure that identified sites are appropriately zoned to accommodate additional housing as assigned in the RHNA (see Program 1 in Chapter V).

Lower-Income Sites

Villa Park is the smallest city in Orange County and was incorporated in 1962 after much of the city had been developed under County zoning regulations. It has an area of only 2.1 square miles and is currently about 99% developed with single-family homes, most of which were built more than 30 years ago. Only a handful of vacant residential lots remain, which are suitable only for low-density development due to topography and emergency access issues. With the exception of one neighborhood commercial center of approximately 10 acres and a few parcels zoned for schools, public institutions or flood control, the City is zoned entirely for single-family residences.

Town Center. The Town Center provides an important opportunity for affordable housing. This commercial center is centrally located in the community and includes a grocery store, banks, a pharmacy with a postal substation, a variety of specialty shops and offices, City Hall and community room, and a branch of the Orange County Public Library. Although there is no vacant land in the Town Center, ~~the~~ two parcels at the northeast corner of the center containing City Hall, the library and an office building are zoned to allow multi-family housing or mixed-use development at a density of 20 to 24 units/acre by-right. The City Hall/library (Figure IV-36) is a single-story building on a half-acre parcel with approximately 5,523 square feet of building floor area (FAR 0.26), while the adjacent 0.92-acre parcel is developed with a two-story office building (Figure IV-37) ~~is two stories and with~~ approximately 13,254 square feet (FAR 0.33) and an improvement-to-land (I/L) assessed value ratio of 0.95. At the minimum density of 20 units/acre, these parcels can accommodate at least 28 units and are suitable for redevelopment in the planning period due to the age of structures and low existing building floor area ratio compared to allowable coverage under zoning standards. Higher density is possible under density bonus law if affordable units are included.

No detailed architectural feasibility analysis has been done for the two parcels. However, as a general indicator of the realistic development capacity of the two Town Center parcels (1.4 acres total), a recent one- and three-story mixed-use project on a smaller 0.98-acre parcel in Newport Beach⁶ was recently approved with a density of 35 units/acre. In addition to 35 housing units, that project also included over 11,000 square feet of commercial space. Given that the Newport Beach project contains 35 units on less than one acre compared to the 28 total units on 1.4 acres estimated for the Town Center parcels, the City believes the estimated capacity can realistically be achieved.

⁶ <https://www.newportbeachca.gov/government/departments/community-development/planning-division/current-projects-and-cases/2510-west-coast-highway-mixed-use-project>

Given the current strong residential real estate market, residential development on these parcels is considered highly feasible. Program 1 includes a commitment to process a Housing Element amendment to identify additional adequate sites if substantial progress is not made toward development of these properties by 2025.

Smith Basin. AnotherThe most significant development opportunity for affordable multi-family housing exists on a vacant parcel at Smith Basin, which is owned by the Orange County Water District (Figure IV-35). This parcel is approximately 17 acres in size and is currently zoned OCFCD and designated *Open Space* in the General Plan. A portion of this property is within the Santiago Creek channel, an important flood control facility; however, other portions of the parcel are outside the channel and could be developed for housing or other uses. The City has discussed potential rezoning and housing development of this property with OCWD and in May 2022 the District's Board President sent a letter to the City ~~has~~ stating that the District would entertain development proposals for the property as long as the core flood control function is preserved ~~expressed no opposition~~. Due to physical site conditions, it is assumed that future development would occur on a portion of the parcel adjacent to Villa Park Road with the remainder set aside for drainage and habitat conservation purposes. Another proposed residential development project (Sully-Miller) is located on former aggregate extraction property with similar physical conditions adjacent to Santiago Creek in the City of Orange approximately one mile upstream (east) of the Smith Basin ~~this~~ site, which demonstrates that the development community believes such issues can be successfully overcome. Major infrastructure (water, sewer, dry utilities) and street access are ~~is~~ all available immediately adjacent to the property ~~within~~ along Villa Park Road. Because of the site characteristics, detailed engineering and environmental studies would be necessary as part of the development process. However, based on preliminary analysis it is estimated that 10.2 acres of the 17.7-acre parcel is developable, and two local developers have already submitted letters to the City expressing interest in developing this property. Since housing is not currently allowed on this property, Program 1 includes a commitment to process General Plan and zoning amendments to allow multi-family housing at appropriate densities pursuant to Government Code §65583.2(h). Since this parcel is larger than 10 acres, ~~The~~ program also includes a commitment for City assistance in processing a subdivision of the property as necessary to accommodate development. Program 1 also includes a commitment to process a Housing Element amendment to identify additional adequate sites if substantial progress toward making this property available for development does not occur by 2025.

Accessory dwelling units. Accessory dwelling units (ADUs) also provide significant opportunities for lower-income housing. As discussed in the Constraints chapter, the City permits two accessory units per parcel by-right (one ADU plus one JADU). Given the low-density single-family character of the city and the very limited amount of land available for new development, ADUs are an important option for affordable housing. It is likely that some ADUs are occupied by family members or household employees with no rent charged, and therefore qualify as extremely-low-income units. ADUs rented at market rates are likely affordable to low- or moderate-income households. Based on 2020 income limits⁷ published by HCD, affordable monthly rent for a 2-person household in Orange County is \$2,050 per month at the low-income level and \$2,472 at the moderate-income level. A recent survey⁸ of apartments advertised for

7 <https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2020.pdf>

8 www.rent.com accessed 11/20/2020

rent found 1-bedroom apartments near Villa Park typically ranging from \$1,500 to \$2,000 per month.

In addition, a recent SCAG study⁹ of ADU affordability concluded that the following assumptions for ADU affordability are appropriate for Orange County:

15%	Extremely-low-income
10%	Very-low-income
43%	Low-income
30%	Moderate-income
2%	Above-moderate-income

The City's assumed income distribution for future ADUs shown in Figure IV-34 is similar to SCAG's findings.

During ~~the first 9 months of 2021~~ the City approved ~~development of 15-18 ADU permits and~~ During in 2020, 12 ADUs were ~~approved~~permitted, a substantial increase from only one ADU in 2019. In consideration of recent changes to State ADU law and proposed City policies to encourage ADU development (see Program 2 in Section V) the land inventory assumes that ADU construction will continue at the average 2019-2021 rate of 10.3342 per year, generating approximately 96-86 additional units ADUs during the planning period as shown in Figure IV-34.

Moderate and Above-Moderate Income Sites

The City's moderate- and above-moderate-income need can be accommodated in the Town Center, through ADUs, ~~and~~ on the vacant OCWD parcel and on vacant single-family lots.

SB 9 Urban Lot Splits. Recent amendments to State law (SB 9) allowing lot splits in single-family residential neighborhoods will help to facilitate infill housing development in built-out single-family areas. Since this opportunity was only recently created, the City has not estimated the expected number of lot splits and new housing units during the planning period. However, there are approximately 2,000 single-family lots in Villa Park and the number of additional units facilitated through lot splits could be substantial. Future SB 9 lot splits have not been assumed for purposes of accommodating the RHNA allocation.

A discussion of public facilities and infrastructure needed to serve future development is contained in Section IV - Constraints. There are currently no known public service or infrastructure constraints that would preclude the level of development described in the RHNA during this planning period.

Affirmatively Furthering Fair Housing

The inventory of sites for additional housing development affirmatively furthers fair housing by creating additional housing opportunities at all income levels throughout the city. Lower-income housing opportunities are provided through ADUs in all residential zones, as well as in the Town Center and the OCWD parcel. As discussed in Appendix C, all of the sites listed in Figure IV-34 are classified as High Opportunity in the HCD/TCAC Opportunity Maps.

9 Southern California Association of Governments, SCAG Regional Accessory Dwelling Unit Affordability Analysis, 12.2020

Figure IV-34 Residential Sites Inventory

APN	Address	General Plan	Zoning	Site Size (Acres)	Existing Use	Potential Additional Units					Potential Constraints
						Very Low	Low	Mod	Above	Total	
Towne Centre											
372-232-10	17855 Santiago	Commercial	Com/Prof	0.49	City Hall/ Library	10				10	Existing 1-story building (FAR 0.26) approx. 45 years old
372-232-17	17871 Santiago	Commercial	Com/Prof	0.92	Professional Offices	18				18	Existing 2-story office building (FAR 0.33) approx. 45 years old
Subtotal				1.41		28				28	
ADUs	Various					2421	4437	2926	2	9686	
Parcels to be Rezoned											
378-441-04	No address	Open Space	OCFCD	17.7 total (10.2 development area)	Vacant	52	31	41	80	204	Owned by OCWD Topography, flood zone, habitat. Assumes 20 du/ac for 10.2 acres of the site
Totals						104101	7268	7067	82	328	
RHNA						93	60	61	82	296	

Figure IV-35 OCWD Parcel

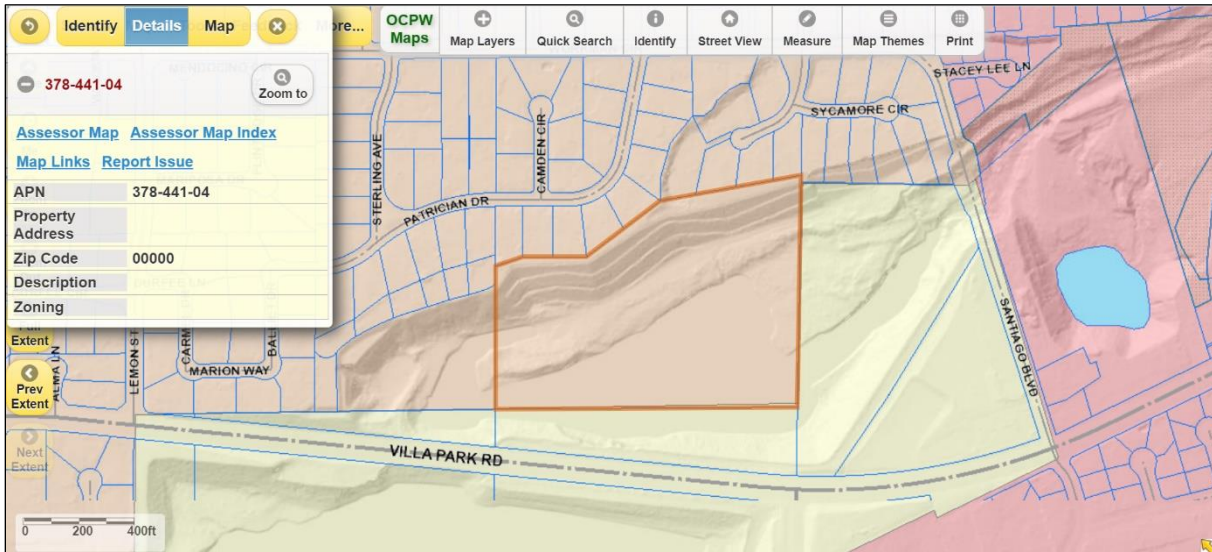
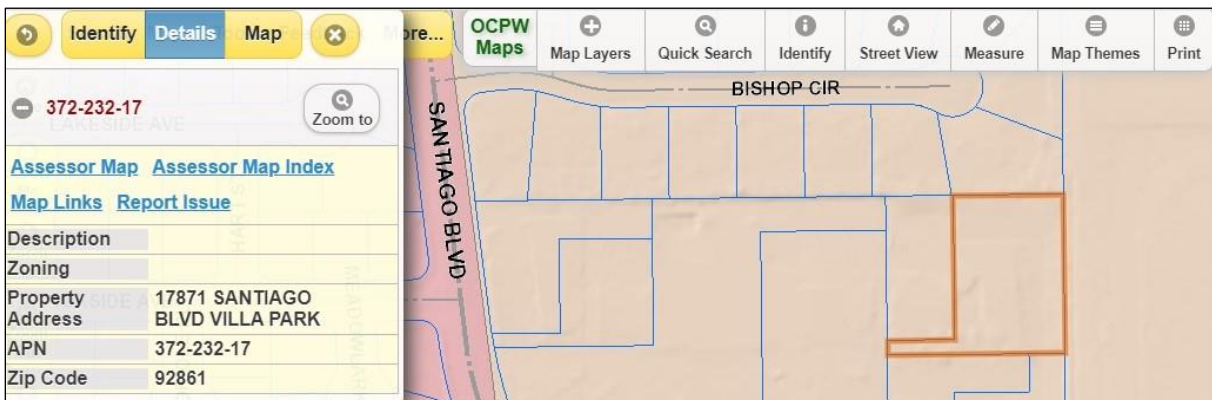


Figure IV-36 17855 Santiago Boulevard



Figure IV-37 17871 Santiago Boulevard



B. Opportunities for Energy Conservation

In relation to new residential development and especially affordable housing, construction of energy efficient buildings can add to the original production costs of ownership and rental housing. Over time, however, housing with energy conservation features will have reduced occupancy costs as the consumption of fuel and electricity is decreased. This means the monthly housing costs may be less than what they otherwise would have been if no energy conservation measures were incorporated in the new residential buildings. Reduced energy consumption is recognized as one way of achieving more affordable housing costs.

The City recognizes that there are several ways to achieve energy conservation in new and existing housing. All modifications to existing residential structures must meet current Title 24 Energy Conservation Standards. In order to encourage solar installation, the City does not charge planning fees and offers an expedited review process for solar installations. The City has seen a large increase in solar installation in recent years. With no economic development function or Housing Department, it is not financially feasible at this time for Villa Park to provide other incentives to encourage green building techniques and materials in new and resale homes, or energy conserving retrofits. However, it is the intent to actively encourage such techniques and to direct interested parties to applicable information sources.

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IV. Constraints

A. Governmental Constraints

Land Use Controls

The General Plan and Zoning Code are the City’s primary land use controls regulating housing development. The Land Use Element of the General Plan establishes the principal residential land use categories in the community. The Zoning Code establishes specific regulations for allowable uses, development standards, and approval procedures for the different land use districts in the city. This section also discusses how the City’s land use regulations accommodate a range of housing types, including lower-income housing and persons with special needs.

General Plan Land Use Element

The General Plan establishes three residential land use categories and one category allowing mixed-use:

- Single Family - 3.0 dwelling units per acre
- Single Family - 2.5 dwelling units per acre
- Single Family - 1.75 dwelling units per acre
- Commercial – 20 to 24 dwelling units per acre in the C-P zone

Zoning Code

The City’s zoning regulations are found in Chapter XXIII of the Municipal Code.¹⁰ In 1962, at the time of incorporation, a single “100-E4-20,000 Small Estates” Zone was adopted for the entire City. In the ensuing years, it became evident that this singular zoning district was more detrimental than beneficial to the City. For this reason, a change in zoning was adopted in order to achieve a well-balanced community and more effective land use transitions.

The zoning change created a transitional zone for the City with a small westerly section zoned for 8,000 square foot lots at a density of not more than three residences per acre adjacent to a 12,000 square foot zone with a density of 2.5 residences per acre. This action provided a gradual transition into the 20,000 square foot small estate zone with a density of 1.75 units per acre.

Along the westerly City border, there are approximately 79 acres zoned three dwelling units per acre. Adjacent to this section, on the easterly side of the zone, there are approximately 57 acres with a density of 2.5 dwelling units per acre. These two zones establish a gradual transition from the City of Orange into the 1.75 du/acre small estate zone. The northerly and easterly portions of the City are entirely zoned for 20,000-square-foot small estate lots.

In addition, the City has a Planned Community (PC) zone allowing single-family residential developments, multiple housing developments, professional and administrative office areas, commercial centers, or any public or semi-public use or combination of uses through the adoption of a development plan and text. One such development is The Orchards (Tract 13942), a 32-unit single-family residential development.

10 https://library.municode.com/ca/villa_park/codes/code_of_ordinances

Currently there are 11 zoning districts allowing residential land uses:

- R-1 (13,500 square feet)
- R-1(12,000 square feet)
- R-1 (10,000 square feet)
- R-1 (9,500 square feet)
- R-1 (9,000 square feet)
- R-1 (8,500 square feet)
- R-1 (8,400 square feet)
- R-1 (8,000 square feet)
- E-4 (<8,000 to 16,999 square feet)
- E-4 (17,000 to 20,000-plus square feet)
- PC (Planned Community)
- CP (Commercial Professional)

The suffix for R-1 zones indicates minimum lot size. Other single-family development standards are summarized in Figure IV-38. While the predominant land use pattern in Villa Park is relatively large single-family lots, it must be recognized that when the City incorporated in 1962 this low-density residential pattern was already established in the County zoning regulations, and relatively few vacant lots remain today.

There are very few vacant residential lots remaining and these standards do not pose a significant constraint to new housing development.

Figure IV-38 Single-Family Residential Development Standards

	R-1 Zones	E-4 Zone
Minimum Lot Width	None	None
Front Yard Setback	20 ft.	30 ft.
Side Yard Setback	5 ft.	10-20 ft.
Rear Yard Setback	25 ft.	25 ft.
Max. lot coverage	33-35%	32-35%
Floor area ratio	38%	38%
Building Height	30 ft.	30 ft.
Off-Street Parking	2 garage stalls	2 garage stalls

Multi-family and mixed-use housing is permitted in the CP zone, which is located in the northeastern portion of the Town Center. Development standards for multi-family and mixed-use developments in the CP zone are as shown in Figure IV-39.

Figure IV-39 Multi-Family and Mixed-Use Development Standards

	CP Zone
Allowable density (minimum - maximum)	20 - 24 units/acre
Minimum residential floor area (mixed-use developments)	50 percent
Minimum Lot Area, Width and Depth	None
<u>Interior lot lines, Front, Side or Rear Yard Setbacks (not adjacent to a street or alley, or abutting another zone)</u>	<u>None</u>
Exterior Front, Side or Rear Yard Setbacks adjacent to a street or alley, or abutting another zone	20 ft.
Interior Yard Setbacks	None
Maximum Building Height	25 ft., or 35 ft. with approval of an Alternate Development Standard
Off-Street Parking	Per Sec. 23-15.3*

*see discussion in Zoning for Lower-Income Housing below

These development standards facilitate development of two- to three-story multi-family housing at a density of 20-24 units/acre without the need for a variance or other discretionary exception (see Program 1).

Zoning for Lower-Income Housing and Persons with Special Needs

Lower-Income Housing. Housing for lower-income persons can be provided in the CP zone by multi-family or mixed-use development, or in ADUs. In 2016 a zoning amendment was adopted to establish additional incentives to facilitate multi-family or mixed-use development in the CP zone. These incentives included by-right permit processing, minimum density of 20 units/acre, and reduced parking requirements as shown below. The height limit for multi-family or mixed-use development is 25 ft. and may be increased to 35 ft. with approval of an alternate development standard.

Parking requirements for mixed-use developments are determined on the basis of a parking plan subject to approval by the City Traffic Engineer (Figure IV-40).

Figure IV-40 Multi-Family Parking Standards

Number of Bedrooms	Minimum Required Parking Spaces
Studio	1.2
1	1.5
2	2
3 or more	2.4

Accessory dwelling units (ADUs). ADUs provide living quarters separate from the primary residence on the same parcel. ADUs typically have a private entrance, kitchen, bathroom and living area. Recent changes to state law allow two accessory units per parcel – one ADU plus one “junior” ADU (JADU) – and also limit the requirements that cities can impose on accessory dwelling units.

Villa Park’s ADU regulations are contained in Article 23-22 of the Municipal Code and were last revised in 2018 to incorporate changes to state law through 2017. The City is currently processing an amendment to ADU regulations to address recent changes to state law. In conformance with state law, the revised standards include the following:

- ADUs and JADUs (one each) permitted on any lot zoned for residential or mixed use containing an existing or proposed single-family or multi-family structure
- ADU maximum size:
 - Detached: 1,200 square feet
 - Attached: 1,200 square feet or 50% of the primary unit, whichever is less
- JADU maximum size: 500 square feet
- Height limit: 16 feet
- Side/rear setbacks: 4 feet
- Off-street parking:
 - ADUs: 1 space
 - If an existing garage is converted to an ADU, no replacement parking required
 - Tandem parking allowed
 - JADUs: none
- Owner occupancy:
 - ADUs: Not required through 2024
 - JADUs: Owner-occupancy required (either the main unit or the JADU)
- Short-term rental: Not allowed
- Review process: By-right; 60-day time limit

Pursuant to current state law, all E-4 and R-1 zoned land within the City, which includes more than 2,000 parcels, allow an attached or detached ADU plus a JADU – a potential for more than 4,000 additional housing units. Accessory dwelling units have proven to be a very valuable housing resource for the city. Residents may construct accessory dwelling units as a housing alternative for elderly or student family members, household employees or live-in care providers. The City prohibits the use of ADUs for short-term rentals, which helps to preserve ADUs as an important source of permanent affordable housing, rather than a commercial activity.

Planning and building fees for ADUs are currently (2021) as follows:

Fee	Amount
City fees	
Planning – Site plan review	\$273
Building plan check + permit	\$5,000
Subtotal – City fees	\$5,273
Other governmental agencies	
School fees	\$3,200
Water connection fee	\$10,000
Sewer connection fee	\$1,000
Subtotal – other agency fees	\$14,200
Grand Total	\$19,473

Notes:
 Fees based on a typical 800-square-foot ADU
 The City has no control over fees charged by other governmental agencies
 Source: City of Villa Park, 2021

The City continues to actively promote ADU construction by informing residents of the Accessory Dwelling Unit Development Program, and by maintaining low application fees, expedited processing and reasonable development standards. Program 2 in the Housing Plan includes a commitment to process an amendment to ADU regulations in conformance with recent

amendments to state law. In order to maximize ADU production, Program 2 incorporates the following additional measures beyond those required in State law:

- Allow ADUs of up to 1,500 square feet on lots of 1 acre or more
- Waive planning fees
- Seek planning grants to reimburse ADU building fees
- Conduct a survey of homeowner interest in ADUs
- Develop ADU promotional materials
- Offer pre-approved ADU building plans

Farmworker Housing. Housing for agricultural employees is low-income housing available without requiring any special requirements. While there is not significant agricultural land within the City of Villa Park and little in the surrounding area, Program 4 includes a commitment to amend the Municipal Code to allow employee housing for up to six employees as a single-family use pursuant to Health and Safety Code Sec. 17021.5.

Emergency Shelters. An emergency shelter is housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less. In compliance with Senate Bill 2, emergency shelters are permitted within the E-4 and R-1 zoning districts by-right subject only to the same restrictions that apply to other residential uses of the same type in the same zone. No limitation on the number of beds or other development standards are currently imposed; however, Program 4 includes a commitment to process a zoning amendment to establish development standards consistent with State law. There are approximately eight vacant parcels in these zones, which provide sufficient capacity to accommodate at least one year-round emergency shelter.

Low Barrier Navigation Centers. AB 101 of 2019 (Government Code §65660 et seq.) established standards for Low Barrier Navigation Centers, which are defined as:

“Housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. “Low Barrier” means best practices to reduce barriers to entry, and may include, but is not limited to, the following:

- (1) The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth.
- (2) Pets.
- (3) The storage of possessions.
- (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.”

A Low Barrier Navigation Center development must be treated as a use by-right in areas zoned for mixed use and nonresidential zones permitting multifamily uses, which includes the CP zoning district. The City is currently processing an amendment to the Municipal Code to allow low barrier navigation centers in the CP district consistent with state law (see Program 4 in Section V).

Transitional and Supportive Housing. Transitional housing is buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Supportive housing is housing with no limit on length of stay, that is occupied by the target population, and that is linked to on-site or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

In compliance with Senate Bill 2, transitional and supportive housing are permitted in any zone where residential use is permitted subject only to those restrictions that apply to other residential dwellings of the same type in the same zone in conformance with state law. In addition, supportive housing must be allowed by-right in any zone where multi-family and mixed uses are permitted pursuant to AB 2162 of 2018. The CP zone allows multi-family housing and mixed use and the City is currently processing an amendment to zoning regulations in conformance with this law (see Program 4 in Section V).

Factory-built and Manufactured Housing. Factory built/manufactured housing is a type of housing unit that is largely constructed and assembled in a factory and then transported to sites of use. Factory built/manufactured housing, as permitted by State law is allowed in any residential zone and is subject to the City's Site Plan Review process.

Mobile Homes. Mobile homes are large trailers, fitted with parts for connection to utilities that can be installed on a relatively permanent site and used as a residence. Mobile homes are only permitted as a residence during construction of a single-family dwelling.

Residential Care Facilities. Individuals with mental, physical, or developmental disabilities often need affordable, conveniently-located housing which, where necessary, has been specially adapted for wheelchair accessibility, along with other physical needs. Living arrangements for six or fewer persons with disabilities may be provided in single-family residences pursuant to State law.

Definition of "family" – The Zoning Code defines family as: *"an individual or two (2) or more persons living together as a single housekeeping unit in a single dwelling unit."* This definition is consistent with current housing law.

Separation requirements – The Zoning Code does not impose any separation requirements between residential care facilities.

Site planning requirements – The site planning requirements for residential care facilities are no different than for other single-family residential uses in the same zone.

Reasonable accommodation – Article 23-27 of the Zoning Code establishes administrative procedures for reviewing and approving requests for modifications to building or zoning requirements in order to ensure reasonable accommodation for persons with disabilities in conformance with state law.

A reasonable accommodation request shall be granted or conditionally granted when the Planning Director finds, consistent with fair housing laws, all of the following:

1. The dwelling subject to the request for a reasonable accommodation will be used by a disabled person protected under fair housing laws;
2. The requested accommodation is necessary to provide the disabled resident(s) an equal opportunity to use and enjoy a dwelling;
3. The requested accommodation will not impose an undue financial or administrative burden on the City;
4. The requested accommodation will not result in a fundamental alteration in the nature of the City's land use and zoning or building program or on the character of the neighborhood affected by the request; and
5. The requested accommodation will not impact the health, safety or general welfare of other individuals and will not result in physical damage to the properties of others.

Large residential care facilities – Large residential care facilities for 7 or more persons are not currently allowed under City zoning regulations. Program 4 includes a commitment to process a zoning amendment to allow large care facilities as a conditional use in appropriate locations.

Building Codes and Enforcement

Villa Park has adopted the current editions of the California Building Codes. These are standardized codes adopted by most cities throughout California. The City does not impose local amendments to requirements or standards that are more stringent than those incorporated in the Code, with the exception of the Fire Code, as recommended by the Orange County Fire Authority.

Planning and building codes are enforced through application review and plan checks, on-site inspections and in response to public complaints.

Site Improvement Requirements

Most cities require site improvements as a part of the normal development process. As land is subdivided and built upon, the City requires improvement of adjacent streets, curbs and gutters, street trees, and other related infrastructure. In keeping with the rural character of the area, no street lights are required and sidewalks are avoided. The improvements required by the City are permitted by State law and are necessary for assuring public safety.

The current system of roadways consists of five basic classifications as follows:

Roadway Classification	Configuration	Roadway Width (ft)
Major arterial	6-lane divided	102
Primary arterial	4-lane divided	84
Secondary arterial	4-lane undivided	64
Collector	2-lane undivided	40

These road standards are typical of other cities in the area.

Development Fees

Fees and exactions required of developers are used to support a variety of functions which include checking submitted plans to ensure public safety and defraying a fair share of the cost of public facilities. Figure IV-41 summarizes permit fees for a typical new home in Villa Park.

Single-family permit fees are based on the construction of a 3,500-square-foot home with an 800 square foot garage and a 400-square-foot patio, while multi-family fees are based on a hypothetical 12-unit development with a total of 10,000 square feet (approximately 833 square feet per unit). These fees are required to defray the cost of providing public services and protecting public health and safety.

Figure IV-41 Typical Development Fees

	Single-family	Multi-family
Planning fees		
Site Plan Review	\$273	\$273
Alternative Development Standards		\$3,011
Subtotal	\$273	\$3,284
Building fees		
City plan check & building permits	\$6,000	\$40,000
School fees	\$9,600	\$40,000
Sewer connection fees	\$4,269	\$50,000
Subtotal	\$19,869	\$130,000
Estimated Total Fees (per unit)	\$20,142	\$11,107
% of total development cost (based on total cost of \$1,500,000 for SF and \$300,000/unit for MF)	1.3%	3.7%

Source: City of Villa Park, 2021
Assumes one SF house with 3,500 square feet living area and a 12-unit MF development with 10,000 square feet total living area

Local Processing and Permit Procedures

Due to the fact that there is very little vacant land within Villa Park and the majority of the existing housing stock is less than 40 years old, development activity in the City is not extensive and primarily involves remodeling of existing single-family dwellings, in-fill development, and construction of ADUs. All development applications, including ADUs, are ministerially reviewed by the City’s Planning, Building, and Engineering Departments unless a modification to development standards is requested. Most residential development applications (single-family or multi-family) are processed completely within two to four months.

Most residential development applications require approval of a Site Plan Review pursuant to Article 23-23 of the Zoning Code. The site plan review procedure enables the Planning Director to check development proposals for conformity with applicable standards.

Required findings for Site Plan Review approval. The Planning Director shall review each application for architectural considerations in order to preserve the architectural integrity of a predominant style and/or to consider compatibility with surrounding homes within a neighborhood. The Planning Director may seek third party advice or counsel, to include subcommittees as created by the City Council, to determine architectural integrity and that the style is compatible with the predominant style of the subject neighborhood. When this chapter or any other provision of law requires a ministerial review process, the review of architectural style and neighborhood compatibility shall be limited to a determination whether the materials and design of the proposed structure would substantially comply with applicable design standards and shall not constitute a "project" for purposes of §21000 et seq. of the Public Resources Code.

These review procedures do not unreasonably impact housing cost and approval certainty.

Densities and approval times. Requested development densities are consistent with allowable densities, and the time between site plan review approval and submittal of building permit application is generally not more than one month.

B. Non-Governmental Constraints

Non-governmental constraints include environmental conditions, infrastructure requirements, and the cost of land, construction, and financing.

Environmental Constraints

Within the City of Villa Park there are three environmental constraints that affect residential development:

- Flood hazard zones – Santiago Creek borders the city on the southeast, and some properties are within designated flood hazard zones. This constraint is mitigated by the City's participation in the Federal Emergency Management Agency's (FEMA) National Flood Insurance Program (NFIP).
- Geological conditions - Two earthquake faults lie within residential zoning districts. This issue is addressed through the application of the most current California Building Codes and the plan check review process.
- Fire hazard zones – as seen in Figure IV-42, a small area in the northern portion of the city is within the Very High Fire Hazard Severity Zone.

These issues are addressed through normal Building Code requirements and do not preclude the City from accommodating its assigned share of regional housing needs.

Infrastructure

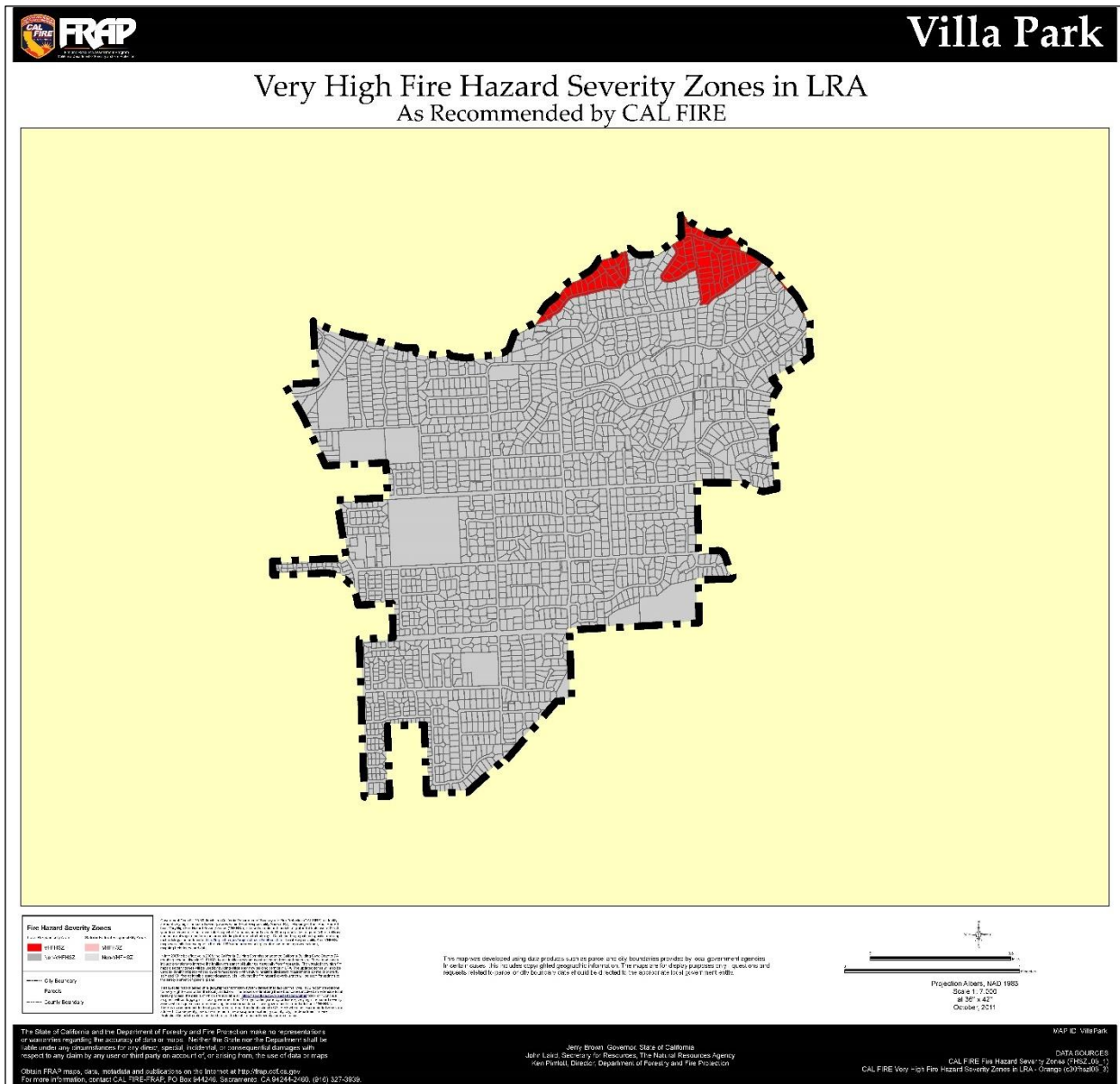
The city is nearly built-out, and sufficient infrastructure is available to accommodate the anticipated amount of infill development during the Housing Element planning period.

Water Supply

Serrano Water District (SWD) serves the City of Villa Park. SWD receives its water supply from local surface water and groundwater from three wells located within the City of Villa Park. The District uses 4,200 to 4,400 acre-feet of water annually, which also includes customers in the City of Orange.

The SWD owns 50% of Irvine Lake, 25% of the water in the lake, and is the managing district for the lake (facility and recreation). With 43 miles of pipe, 3 wells, a treatment plant, and two reservoirs, all infrastructure needed to support expected future infill development in Villa Park is already in place. Water supply is expected to be sufficient to accommodate new housing needs during the planning period.

Figure IV-42 Very High Fire Hazard Severity Zone - Villa Park



Wastewater Collection and Treatment

The City owns and operates a sanitary sewer system in coordination with the Orange County Sanitation District for the benefit of the residents of the community. The system was constructed primarily in the 1960s and 1970s and is fully developed. The system consists of approximately 153,000 linear feet (29 miles) of collector and trunk sewer mains ranging in size from 8 to 15 inches in diameter. Some of the trunk mains are joint use mains with the City of Orange. It is estimated there are about 26 operating septic tank systems remaining in the city.

Wastewater treatment is provided by Orange County Sanitation District, of which Villa Park is a member. Treatment capacity is sufficient to accommodate projected development in Villa Park for the Housing Element planning period.

Land Cost

A key component in the cost of development is the price of raw land and any necessary improvements. In Villa Park, the virtual non-existence of vacant subdividable residential land combined with a high demand for such development keeps land costs high. Based on recent sales in the Villa Park area, the value of developable single-family lots is estimated to be approximately \$1 million or more, depending on lot size and site features. Land costs of this magnitude make the development of affordable housing in the remaining vacant lots highly unlikely.

Construction Cost

Construction costs vary widely according to the type of development, with multi-family housing generally being less expensive to construct than single-family homes. However, there is wide variation within each construction type, depending on the size of the unit and the number and quality of amenities provided. In recent years, construction costs for materials and labor have increased at a higher pace than the general rate of inflation according to the Construction Industry Research Board. The International Code Council estimates that the average cost of good quality construction is approximately \$120 per square foot for typical single-family homes, with low-rise multi-family construction somewhat lower. These costs are exclusive of the costs of land and soft costs, such as entitlements, financing, etc. In high-cost communities like Villa Park, new homes typically have a high level of amenities and features, resulting in higher than average construction cost.

Cost and Availability of Financing

Villa Park is similar to most other Southern California communities with regard to private sector home financing programs. Although interest rates are currently at historic low levels for those with good credit, many lower-income households may have difficulty qualifying for home loans.

Under state law, it is illegal for real estate lending institutions to discriminate against entire neighborhoods in lending practices because of the physical or economic conditions in the area (“redlining”). Villa Park has no low-income neighborhoods and there is no evidence of redlining in Villa Park.

V. Housing Plan

A. Goals and Policies

This section of the Housing Element describes the housing strategy to be implemented by the City during the 2021-2029 planning period.

Housing Element Goal: The City’s principal goal is to contribute to meeting the statewide goal of a decent home and suitable living environment for all people.

Housing Policies:

- H #1: To maintain a housing stock free of substandard conditions.
- H #2: To accommodate the special housing needs of the elderly, frail elderly and handicapped populations through the development of new multi-family, mixed use, or accessory dwelling units.
- H #3: To meet the needs of low-income persons through the development of new multi-family, mixed use, or accessory dwelling units.
- H #4: To continue to comply with State and Federal housing laws and regulations.
- H #5: To promote open and free choice of housing for all.
- H #6: To promote equal opportunity of choice throughout the housing market area for all residents regardless of race, creed, national origin or ethnicity.

B. Housing Programs

The following programs describe specific actions the City of Villa Park will carry out over the eight-year Housing Element cycle to address the community’s housing needs and the requirements of State law.

Program 1 Adequate Sites to Accommodate Regional Housing Needs

The City’s assigned share of regional housing needs for the 2021-2029 planning period is 296 units, of which 153 units are in the lower-income categories. The City’s inventory of potential sites for housing development, shown previously in Figure IV-34, can accommodate the RHNA in a variety of ways, including:

- Multi-family or mixed-use development in the CP zone in the Town Center
- Accessory dwelling units
- Rezoning of vacant land at the Smith Basin

The City will implement the following actions to facilitate the production of housing commensurate with the RHNA during the planning period.

City Hall Property

- Affordable housing outreach. The City will contact non-profit housing developers by October 2022 and annually thereafter to solicit development interest in the City Hall parcel.

- Coordination with Adjacent Property Owner. The City will contact the adjacent property owner (APN 372-232-17) by October 2022 and annually thereafter to discuss potential joint development options for the two adjacent properties.
- Request for Proposals. The City will issue an RFP to affordable housing developers by October 2022 for redevelopment of the City Hall property.
- Expedited permit processing. The City will provide technical assistance and expedited permit review for an affordable housing development application on the City Hall site.
- Incentives and concessions. The City will offer incentives and concessions, including modified development standards, to enhance the financial feasibility of rental housing affordable to lower-income families, local employees and special needs groups, including extremely-low-income persons where feasible. A modified development standard necessary to achieve the allowable project density of 20-24 units/acre, or higher as part of a density bonus, shall not require discretionary approval.
- Support grant funding applications. The City will provide assistance to affordable housing developers in applying for State or Federal funding programs.
- Development Fees. For affordable and special needs housing units proposed on the City-owned parcel, the City will provide a fee waiver or subsidy.

OCWD Property (Smith Basin)

~~As discussed in Section III.A, The City will process~~ General Plan and zoning amendments ~~will be processed by October 2022~~ for at least 10.2 acres of vacant land listed in Figure IV-34 to allow multi-family development pursuant to Government Code §65583.2(h). Zoning shall permit owner-occupied and rental multi-family residential use by-right for developments in which at least 20% of the units are affordable to lower-income households and shall require a density of at least 20 units per acre. Rezoning shall be completed within the time period specified in Government Code §65583(c)(1)(A). In order to increase the likelihood of affordable housing development during the planning period, the City will implement the following actions:

- ~~Affordable housing outreach.~~ ~~The City will contact non-profit housing developers annually to solicit interest in development.~~
- Outreach and Coordination with OCWD. ~~With the concurrence of OCWD~~ ~~The City will contact non-profit housing developers by October 2022 and annually thereafter to solicit development interest, and~~ assist with coordination of a development proposal between the property owner, developer, service providers and other affected agencies.
- Expedited permit processing. The City will provide technical assistance and expedited permit review for an affordable housing development.
- Incentives and concessions. The City will offer incentives and concessions, including modified development standards, to enhance the financial feasibility of rental housing affordable to lower-income families, workers and special needs groups, including extremely-low-income persons where feasible.
- Support grant funding applications. The City will provide assistance to affordable housing developers in applying for State or Federal funding programs.

- *Development Fees.* For affordable and special needs housing ~~projects~~ units proposed on these parcels, the City will provide a fee waiver or subsidy.
- *Lot assembly or subdivision assistance.* When an affordable or special needs housing development project requires lot assembly or subdivision the City will assist the applicant through expedited concurrent processing of all required permits and approvals.

The City will continue to annually update the inventory of sites that details the amount, type, and size of vacant and underutilized parcels to assist developers in identifying land suitable for residential development and that also details the number of extremely-low-, very-low-, low-, and moderate-income units constructed annually.

To ensure sufficient residential capacity is maintained to accommodate the RHNA throughout the planning period, the City will conduct a project-by-project evaluation pursuant to Government Code Section 65863. Should a development approval result in a reduction of capacity below the level needed to accommodate the remaining need for lower-income households, the City will identify and zone sufficient sites to accommodate the shortfall.

If substantial progress in making the Town Center and OCWD properties available for development has not occurred by 2025 the City will initiate a Housing Element amendment to identify alternative adequate sites to accommodate the remaining RHNA for the planning period.

<i>Responsibility:</i>	The City Manager’s Office and Planning Department
<i>Timing:</i>	General Plan and zoning amendments by <u>October 2022</u> ; annual outreach to developers; <u>review progress by 2025 and initiate a Housing Element amendment if necessary to ensure adequate sites to accommodate the remaining RHNA for the planning period</u>
<i>Funding:</i>	General Fund
<i>Objective:</i>	Provide adequate sites to accommodate the City’s RHNA allocation

Program 2 Accessory Dwelling Units

Accessory dwelling units (ADUs) provide affordable housing opportunities for the elderly, household employees, disabled persons and low-income persons, as well as a source of income for retired homeowners. The City’s zoning regulations allow accessory units within all residential zones. A Zoning Code amendment will be processed in 2022 to incorporate recent changes in State ADU law (Government Code §65852.2 and §65852.22). In order to maximize ADU development, the amendment will incorporate additional provisions beyond those required under State law including the following:

- Allow larger ADUs of up to 1,500 square feet on lots of 1 acre or more
- Offer incentives to encourage conversion of guest houses to ADUs
- Offer incentives to encourage applicants for room additions to include a JADU in the added area
- Waive planning fees
- Seek planning grants to reimburse ADU building fees
- Conduct a survey of homeowner interest in ADUs
- Develop ADU promotional materials
- Offer pre-approved ADU building plans

The City will continue to facilitate ADU construction by providing information to interested homeowners at City Hall and on the City website, and will monitor the number and affordability of new ADUs. ADU production will be monitored on an annual basis and if the City finds that ADUs are not being developed and made available at affordable rents to lower-income households at the rate anticipated, the City will implement additional incentives to more effectively promote development of affordable accessory units within six months of the findings.

- Responsibility:* The City Manager’s Office and Planning Department
- Timing:* Annual monitoring throughout the planning period; process a Zoning Code amendment in 2022
- Funding:* General Fund; grant funds
- Objective:* Facilitate additional ADU development

Program 3 Facilitate Housing Development for All Economic Segments of the Community

The City will continue to facilitate development of housing for persons of all income levels, including extremely-low-income persons, as well as housing for persons with special needs through incentives such as density bonus, ADUs, mixed-use development and expedited permit processing. To encourage multi-family, mixed-use, or special needs housing development in the C-P zone the City will notify affordable housing providers annually of this development opportunity and offer additional incentives such as fee reductions for projects that include units that are affordable to local employees or persons with special needs.

- Responsibility:* The City Manager’s Office and Planning Department
- Timing:* Throughout the planning period; notify affordable housing developers annually of development opportunities and monitor accomplishments on an annual basis
- Funding:* General Fund
- Objective:* Facilitate housing development for all economic segments

Program 4 Housing for Persons with Disabilities and Other Special Needs

The City will continue to facilitate the provision of housing for persons with special needs, including developmental disabilities, such as emergency shelters, transitional and supportive housing, and residential care facilities. The Zoning Code allows transitional and supportive housing subject only to the same requirements as apply to other residential dwellings of the same type in the same zone, and establishes procedures for reviewing and approving requests for reasonable accommodation in conformance with fair housing law. A Municipal Code amendment to establish development standards for emergency shelters, allow supportive housing pursuant to AB 2162, allow low barrier navigation centers pursuant to AB 101 by-right in the CP zone, allow employee housing pursuant to Health and Safety Code Sec. 17021.5, allow residential care facilities for 7 or more persons subject to a conditional use permit, and eliminate neighborhood character as a consideration for approving requests for reasonable accommodation will be processed during 2021-22.

<i>Responsibility:</i>	The City Manager's Office and Planning Department
<i>Timing:</i>	Municipal Code amendment by October 2022 <u>in 2021-22</u>
<i>Funding:</i>	General Fund
<i>Objective:</i>	Ensure that City regulations encourage and facilitate the provision of housing for persons with special needs in conformance with state law

Program 5 Encourage the Conservation and Maintenance of the City's Existing Housing Stock

The City will continue to monitor housing conditions and encourage property maintenance and rehabilitation through code enforcement, crime watch, and neighborhood beautification efforts. Because of very high property values, substantial housing deterioration is rare and property owners typically have sufficient financial resources to carry out repairs. The City will include a link on the website and provide handouts indicating resources and programs available to encourage housing stock maintenance and rehabilitation. If it is determined that housing conditions are deteriorating the City will evaluate additional future actions as appropriate by 2025, including exploring partnerships with non-profit organizations.

<i>Responsibility:</i>	The City Manager's Office and Planning Department
<i>Timing:</i>	Throughout the planning period; <u>determine whether housing conditions are deteriorating by 2025</u>
<i>Funding:</i>	General Fund
<i>Objective:</i>	Conserve and maintain existing housing

Program 6 Equal Housing Opportunities and Affirmatively Furthering Fair Housing

The City will advocate against discrimination in the sale, rental, or financing of housing based on race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability. Information and referrals regarding fair housing laws and rights will be posted on the City's website and in City Hall and other public buildings.

"Affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all public agency's activities and programs relating to housing and community development.

Pursuant to Government Code §8899.50(b), the City will continue to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing and will take no action that is materially inconsistent with its obligation to affirmatively further fair housing. In addition, the City will:

- Ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application's compliance with all entitlement requirements.

- Accommodate persons with disabilities who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the applicable development regulations.
- Work with the County of Orange and the Fair Housing Council of Orange County to seek additional funding to implement the regional Analysis of Impediments to Fair Housing Choice and HUD Consolidated Plan, with the goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire.
- Facilitate public education and outreach by posting informational flyers on fair housing at public counters, libraries, and on the City’s website, and support the FHCOC in providing fair housing information to residents and training to landlords on requirements under fair housing law, such as the acceptance of Housing Choice Vouchers.
- Conduct public meetings at suitable times, accessible to persons with disabilities, and near public transit. Resources will be invested to provide interpretation and translation services when requested at public meetings when feasible.
- Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings. Encourage community and stakeholder engagement during development decisions.

Responsibility: The City Manager’s Office and Planning Department
Timing: Throughout the planning period
Funding: General Fund
Objective: Encourage fair housing practices in the city

Program 7 Energy Efficiency

The City’s will continue to encourage green building techniques and promote energy audits and participation in utility energy conservation programs by posting information on the City’s website and in City Hall.

Responsibility: The City Manager’s Office and Planning Department
Timing: Throughout the planning period
Funding: General Fund
Objective: Encourage energy efficiency in residential developments

Program 8 Housing Element Monitoring, Reporting and Consistency Review

Pursuant to Government Code 65400 the City will monitor and report on progress in implementing Housing Element programs annually. If any Housing Element policies or programs are determined to be inconsistent with other provisions of the General Plan, appropriate actions will be taken to maintain consistency among all General Plan elements.

Responsibility: The City Manager’s Office and Planning Department
Timing: Annually throughout the planning period
Funding: General Fund
Objective: Ensure compliance with General Plan monitoring and consistency requirements

C. Quantified Objectives

The City’s quantified objectives for the construction, rehabilitation, and conservation/preservation of housing for the 2021-2029 planning period are shown in Figure IV-43.

Figure IV-43 Quantified Objectives 2021-2029

	Very Low (Extremely Low)	Low	Moderate	Above Moderate
Construction	93 (47)	60	61	82
Rehabilitation	0	0	0	0
Conservation/Preservation	0	0	0	0

Appendix A Evaluation of the Prior 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.

The City has reviewed the goals, objectives and policies and determined that they continue to be appropriate. Table A-1 summarizes the programs contained in the previous Housing Element along with the City's accomplishments and implications for future policies and actions. The results of this evaluation have been incorporated into the Housing Plan for the 2021-2029 period.

Cumulative Effectiveness of Meeting the Needs of Special Needs Populations

Special needs populations include seniors, large families with five or more members, persons with disabilities, farmworkers and the homeless. While Villa Park is the smallest city in Orange County with a population of approximately 5,800 and a City budget that is insufficient to support dedicated housing staff, the City has nevertheless facilitated the production of special needs housing in several ways. According to the California Department of Social Services there are eight licensed residential care facilities in Villa Park that serve the special needs of the elderly and persons with disabilities. The City enabled these facilities through its zoning regulations that treat small residential care facilities as a residential use subject only to the same standards as apply to other residential uses of the same type in the same zone, consistent with State law. The City also provides modifications to zoning and building regulations through the reasonable accommodation ordinance when necessary to accommodate a disabled person's special needs.

The housing needs of farmworkers are addressed through City land use regulations that allow employee housing for six or fewer persons as a residential use subject only to the same standards as apply to other residential uses of the same type in the same zone, consistent with State law. The needs of homeless persons are addressed through City regulations that encourage emergency shelters, low barrier navigation centers, supportive housing and transitional housing (see Program 4 in Chapter V).

In addition, Villa Park was a member of the consortium of agencies that established two new navigation centers serving the homeless in northern Orange County. A regional partnership of 13 northern Orange County cities (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park, and Yorba Linda) worked cooperatively to share information and resources to address regional homelessness. The consortium's guiding principle was to promote greater regional coordination to address homeless issues.

After months of extensive discussions, negotiations and assessments, two locations within the North Orange County Service Planning Area were identified for the development of navigation centers based on a number of factors including proximity to related services and site availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in Anaheim that accommodated 325 new beds.

Funding for the Navigation Centers was secured through \$12 million in State Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of the navigation centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing operation of the navigation centers. A Memorandum of Understanding was approved by the city councils of all 13 cities in May 2019 with the opening of the first 100-bed navigation center in Placentia in March 2020. This groundbreaking success story was born of the regional need and public officials' desire to work together to address homelessness through the creation of multi-jurisdictional homelessness facilities.

**Table A-1
Housing Element Program Evaluation
2013-2021**

Program	Responsible Agencies and Officials	Timeframe	Accomplishments and Future Actions
<p>1. <u>Adequate Sites to Accommodate Regional Housing Needs.</u> The City’s share of regional housing needs for the 2013-2021 planning period is 19 units, including 10 lower-income units. To ensure that adequate sites are available to facilitate lower-income housing, a Zoning Code amendment will be processed to allow multi-family residential or mixed-use development in the C-P zone consistent with Government Code §65583.2(h) and (i). Adequate capacity currently exists to accommodate the City’s share of moderate- and above-moderate-income housing.</p>	<p>City Manager’s Office and Planning Department</p>	<p>Zoning amendment in 2016</p>	<p>Ordinance 2016-604, adopted in December 2016, amended zoning regulations to create additional opportunities for multi-family housing. The amended regulations allow multi-family and mixed-use housing by-right in the C-P zone (Town Center) with a minimum density of 20 units/acre and a maximum density of 24 units/acre. The minimum residential floor area for mixed-use developments is 50%.</p>
<p>2. <u>Second Units.</u> Second units provide affordable housing opportunities for the elderly, household employees, disabled persons and low-income persons, as well as a source of income for retired homeowners. The City’s zoning regulations allow second dwelling units within the R-1, E-4 and PC zones in conformance with state law. The City will continue to facilitate second unit construction by providing information to interested homeowners at City Hall and on the City website, and through expediting permit processing. The City will grant fee waivers or reductions in exchange for affordability commitments on second units, and monitor the affordability of new second units produced. If the City finds that second units are not being developed and made available at affordable rents to lower income households, the City will implement additional incentives to more effectively promote development of affordable second units within six months of the findings. Second unit production will be monitored on an annual basis.</p>	<p>City Manager’s Office and Planning Department.</p>	<p>Annual monitoring throughout the planning period</p>	<p>The City continued to facilitate second unit development by providing information to interested homeowners. During 2014-2020 there were 13 ADUs approved.</p>
<p>3. <u>Facilitate Housing Development for All Economic Segments of the Community.</u> The City will continue to facilitate development of housing for persons of all income levels, including extremely-low-income persons, through incentives such as density bonus, second units,</p>	<p>City Manager’s Office and Planning Department.</p>	<p>Throughout the planning period; notify local developers of development</p>	<p>The City continued to encourage development of housing for persons of all income levels through incentives such as density bonus, second units, mixed-use development and expedited permit</p>

Program	Responsible Agencies and Officials	Timeframe	Accomplishments and Future Actions
<p>mixed-use development and expedited permit processing. To encourage multi-family or mixed-use development in the C-P zone (see Program 1) the City will notify housing providers of this development opportunity and offer additional incentives such as fee reductions for projects that include units that are affordable to local employees or persons with special needs. If these activities and incentives are not effective in generating interest in redevelopment of the City Hall/Library and adjacent office properties, the City will explore and enact additional strategies to promote redevelopment of these sites within six months of the findings.</p>		<p>opportunities and monitor accomplishments on an annual basis.</p>	<p>processing. To encourage multi-family or mixed-use development in the C-P zone the City amended zoning regulations as described in Program 1 and notified housing providers of development opportunities in the C-P zone. A public workshop was held on July 10, 2017 to provide additional information to housing developers and other interested parties.</p>
<p>4. <u>Housing for Persons with Disabilities and Other Special Needs</u>. The City will continue to facilitate the provision of housing for persons with special needs, including developmental disabilities, such as emergency shelters, transitional and supportive housing, and residential care facilities. Zoning Code amendments will also be processed to ensure that transitional and supportive housing are permitted subject only to the same requirements as apply to other residential dwellings of the same type in the same zone, and establish procedures for reviewing and approving requests for reasonable accommodation in conformance with fair housing law.</p>	<p>City Manager’s Office and Planning Department.</p>	<p>Zoning amendments in 2016</p>	<p>Ordinance 2016-604, adopted in 2016, amended zoning regulations to allow transitional and supportive housing in any zone where residential use is allowed subject only to the same requirements as apply to other residential dwellings of the same type in the same zone, and established procedures for reviewing and approving requests for reasonable accommodation in conformance with state law. Two residential care facilities have been established in the city, which demonstrates that the City’s regulations and procedures facilitate production of such facilities.</p>
<p>5. <u>Encourage the Conservation and Maintenance of the City’s Existing Housing Stock</u>. The City will continue to encourage property maintenance and rehabilitation through code enforcement, crime watch, and neighborhood beautification efforts. The City will include a link on the website and provide handouts indicating resources and programs available to encourage housing stock maintenance and rehabilitation.</p>	<p>City Manager’s Office and Planning Department.</p>	<p>Throughout the planning period</p>	<p>The City continued code enforcement and crime watch efforts. Information regarding housing stock maintenance and rehabilitation is provided at City Hall and on the City website.</p>
<p>6. <u>Equal Housing Opportunities</u>. The City will advocate against discrimination in the sale, rental, or financing of housing based on race, religion, sex, marital status,</p>	<p>City Manager’s Office and Planning Department.</p>	<p>Throughout the planning period</p>	<p>Fair housing information is posted on the City’s website and in City Hall and other public buildings.</p>

Program	Responsible Agencies and Officials	Timeframe	Accomplishments and Future Actions
ancestry, national origin, color, familial status, or disability. Information and referrals regarding fair housing laws and rights will be posted on the City's website and in City Hall and other public buildings.			
7. <u>Energy Efficiency</u> . The City's will continue to encourage green building techniques and promote energy audits and participation in utility energy conservation programs by posting information on the City's website and in City Hall.	City Manager's Office and Planning Department.	Throughout the planning period	Information regarding green building techniques and energy conservation programs is posted on the City's website and in City Hall.

Appendix B Public Participation

The update to the Villa Park Housing Element for the 2021-2029 planning period has provided residents and other interested parties with opportunities to review draft documents and proposed programs, and to provide recommendations for consideration by decision-makers. Public notices of all Housing Element meetings were published in advance of each meeting, and the draft Housing Element was made available for review at City Hall and posted on the City’s website.

As part of the public review process, the following public meetings were held to review the draft Housing Element.

December 15, 2020	Public workshop
March 9, 2021	City Council public meeting
April 13, 2021	City Council public meeting
May 11, 2021	City Council public meeting
September 28, 2021	City Council public hearing
<u>January 25, 2022</u>	<u>City Council public meeting</u>
<u>February 22, 2022</u>	<u>City Council public meeting</u>
<u>March 22, 2022</u>	<u>City Council public meeting</u>
<u>June 28, 2022</u>	<u>City Council public hearing</u>

Table B-1 provides a list of persons and organizations that were sent direct mail notice of all public meetings on the Housing Element while Table B-2 summarizes comments received and how those comments have been addressed. Table B-3 provides a list of comments regarding potential sites for housing.

Table B-1 Public Notice List

Kennedy Commission
17701 Cowan Ave., Suite 200
Irvine, CA 92614
cesarc@kennedycommission.org
mildredp@kennedycommission.org

League of Women Voters
PO Box 1065
Huntington Beach, CA 92647
hat@lwvorangeoast.org

OC Association of Realtors
25552 La Paz Road
Laguna Hills, CA 92653
info@ocrealtors.org

Neighborhood Housing Services
of Orange County
198 W. Lincoln Ave., 2nd Floor
Anaheim, CA 92805
info@nwoc.org

Habitat for Humanity of Orange County
2200 S. Ritchey St.
Santa Ana, CA 92705
info@habitatoc.org

Jamboree Housing Corp.
17701 Cowan Avenue
Suite 200
Irvine, CA 92614
board@jamboreehousing.com

The Related Companies of California
18201 Von Karman Ave Ste 900
Irvine, CA 92612
jil.blumbergfroman@related.com

Community Housing Resources, Inc.
17701 Cowan Avenue, Suite 200
Irvine, CA 92614
board@jamboreehousing.com

BIA/OC
17744 Sky Park Circle #170
Irvine, CA 92614
membership@biasc.org

Dayle McIntosh Center
501 N. Brookhurst Street, Suite 102
Anaheim, CA 92801
housing@daylemc.org

OC Housing Providers
25241 Paseo de Alicia, Suite 120
Laguna Hills, CA 92653
info@mhet.com

Regional Center of Orange County
P.O. Box 22010
Santa Ana, CA 92702-2010
CentralOffice@rcocdd.com

OC Business Council
2 Park Plaza, Suite 100
Irvine, CA 92614
cmolina@ocbc.org

OC Housing Trust
198 W. Lincoln Ave., 2nd Floor
Anaheim, CA 92805
info@nwoc.org

Neighborhood Housing Services
of Orange County
198 W. Lincoln Ave., 2nd Floor
Anaheim, CA 92805
info@nwoc.org

Mercy Housing
1500 South Grand Avenue, Suite 100
Los Angeles, California 90015
kpeterston@mercyhousing.org
mercyhousing@mercyhousing.org

OC Housing & Community Development
1501 E. St Andrew Place, First Floor
Santa Ana, CA 92705
OCHAContact@occr.ocgov.com

Orange County Housing Authority
1501 E St Andrew Pl
Santa Ana, CA 92705
OCHAContact@occr.ocgov.com

Fair Housing Council of Orange County
2021 E. 4th Street, Suite 122
Santa Ana, CA 92705
info@fairhousingoc.org

City of Anaheim
Community Development Director
200 S. Anaheim Blvd.
Anaheim, CA 92805
anogal@anaheim.net

Public Law Center
601 Civic Center Drive West
Santa Ana, CA 92701-4002

LINC Housing Corporation
3590 Elm Avenue
Long Beach, CA 90807
linc@linchousing.org

The Olson Company
3010 Old Ranch Pkwy, #100
Seal Beach, CA 90740

So. Calif. Housing Development
Corp.
9421 Haven Avenue
Rancho Cucamonga, CA 91730

Mercy House
P.O. Box 1905
Santa Ana, CA 92702
info@mercyhouse.net

Orange County Water District
P.O. Box 8300
Fountain Valley, CA 92728-8300
info@ocwd.com

Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708
ForInformation@ocsan.gov

Pathways of Hope
1231 E Chapman Ave
Fullerton, CA 92831
info@pohoc.org

OC Partnership
1505 17th St.
Santa Ana, CA 92705
erocha@211oc.org
resource@211oc.org

OC Community Housing Corporation
501 N. Golden Circle Drive
Santa Ana, CA 92705

RC Hobbs Company
1110 E. Chapman Ave., Suite 206
Orange, CA 92866

County of Orange
Public Works/Development Services
601 North Ross Street
Santa Ana, CA 92701

City of Orange
Community Development Dept.
300 East Chapman Avenue
Orange, CA 92866

St. Joseph Hospital
Cecilia Bustamante Pixa, MPH, MHCML
Director, Community Health Investment
Cecilia.Bustamante-Pixa@stjoe.org

National CORE
9421 Haven Avenue
Rancho Cucamonga, CA 91730
info@nationalcore.org

California Pacific Homes
Attn: Charles Jackson
5251 California Ave, Suite 250
Irvine, CA 92617

**Table B-2
Summary of Public Comments**

Comment	Response
<p>The City of Villa Park has been allocated 296 housing units of which 153 are required to be lower income units. In 2012 the City was only allocated 14 units for the 5th cycle. During this current planning period, the City has constructed none of the lower income units but has met the requirement for moderate and above moderate units. According to Villa Park’s Housing Needs Assessment, 73% of extremely-low-income households and 55% of very-low-income households were paying more than 30% of gross income for housing. The incidence of overpayment was substantially lower for households in the moderate- and above-moderate-income categories.</p> <p>The Kennedy Commission seeks to ensure that jurisdictions engage the public in revising their Housing Elements. Public engagement is a necessary component of the Housing Element process as California Housing Element law states: “The local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element...” Broad participation and true engagement of the public increases the likelihood that the community members involved in the discussion and planning processes will support new housing strategies and housing developments. Public engagement should include participation from residents of diverse communities, housing consumers, service providers, and advocates.</p> <p>As the City embarks upon the 2021-29 Housing Element update, the Commission requests that the City include us in the upcoming Housing Element review and evaluation of the current 5th cycle planning period goals, policies, and accomplishments. The Commission further requests that the City conduct a robust public participation process for the 6th cycle Housing Element update and that it incorporates the Commission, affordable housing advocates, and residents of low-income communities in this process. We believe that you will achieve a stronger Housing Element update through diverse community participation, outreach, and community planning process.</p> <p>To ensure adequate public participation the Commission recommends the following:</p> <ol style="list-style-type: none"> 1. The City should engage community participation and feedback at all stages of the Housing Element review and update. Participation should not be limited to public hearings. 2. The City should allow for various methods of engagement to encourage public participation. For instance, for members of the public who may not have access to the internet or a computer, or who are unable to use video applications, consistently provide an adequate telephone option – available in multiple languages – and generally ensure that members of the community who lack adequate technology can participate in meetings about the Housing Element review. 3. The City’s public participation and outreach opportunities should be meaningful and create various platforms (for example, virtual, written, workshops, webinars, community meetings, and public hearings) for the engagement of community members who reside in lower-income communities, affordable housing partners, Legal Aid organizations, and advocates. 	<p>It is widely recognized that housing needs are greater than available resources to produce affordable housing. Overpayment is one of the major challenges, particularly for households at the lowest economic levels. Villa Park is one of the smallest cities in Orange County and has no capacity to provide housing subsidies to lower-income families. The best strategy for facilitating additional affordable housing is through accessory dwelling units. According to a recent SCAG study, 98% of ADUs in Orange County are assumed to be affordable to low- and moderate-income households, with over two-thirds affordable to lower-income households. Villa Park continues to facilitate ADU production as a major component of its affordable housing strategy.</p> <p>As part of the Housing Element update, the City is encouraging public participation from all economic segments of the community as well as organizations representing persons with disabilities and other special needs. Table B-1 shows the City’s notification list for all public meetings on the Housing Element and the City also maintains a website with public notices and copies of the Housing Element and other relevant materials. The City will continue to solicit comments and recommendations from all stakeholders throughout the Housing Element update process.</p>

Comment	Response
<p>4. The City should create a diverse Housing Element Working Group to evaluate the current Housing Element policies and accomplishments. This Working Group could help create policies and recommendations for the new Housing Element update to ensure that you meet the housing needs of those who are most vulnerable in the City.</p> <p>5. The City should include The Commission in any anticipated Housing Element Working Group and provide the opportunity for the Commission to provide its analysis on 5th cycle RHNA progress and be a part of developing policy recommendations on the 6th cycle update.</p> <p>6. The City should engage community organizations representing and advocating for families and individuals residing in lower-income communities to ensure that members of these communities can directly participate and that the City considers their perspective as part of the evaluation and creation of policies that create affordable housing.</p>	

**Table B-3
Public Comments**

	Date	Source	Initiator	Address	Comment
1)	4/20/2021	phone	Erik Reynolds	Helena Circle	Opposed to Fitschen Ranch Rezoning
2)	4/21/2021	phone	Mike Noble	Helena Circle	Opposed to Fitschen Ranch Rezoning
3)	4/22/2021	email	Mariela Rendon	Beckley Circle	Opposed to Fitschen Ranch Rezoning
4)	4/22/2021	email	Mike & Valerie Noble	Helena Circle	Opposed to Fitschen Ranch Rezoning
5)	4/22/2021	email	Isaac Novella	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
6)	4/22/2021	email	Andrea Mittelstaedt	Beckley Circle	Opposed to Fitschen Ranch Rezoning
7)	4/22/2021	email	Anne Ausmus	Portsmouth Circle	Opposed to Fitschen Ranch Rezoning
8)	4/22/2021	email	Christie Chapman	Aberdeen Lane	Opposed to Fitschen Ranch Rezoning
9)	4/23/2021	email	Ron & Mary Deibel	Lincoln Street	Opposed to Fitschen Ranch Rezoning
10)	4/23/2021	email	Jose Dalprat	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
11)	4/23/2021	email	Layra V Alcalá-Dalprat	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
12)	4/24/2021	email	Betty & Billy Campbell & Leigh Skidmore	Not identified	Opposed to Fitschen Ranch Rezoning
13)	4/24/2021	email	John Whitman	Not identified	Opposed to Fitschen Ranch Rezoning & prefers Tropical Plaza/OCWD property & Town Center should be an option
14)	4/25/2021	email	Alvey W. Pratt	Helena Circle	Opposed to Fitschen Ranch Rezoning
15)	4/25/2021	email	Duc & Thuy Phan	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
16)	4/25/2021	email	Elaine Kuli	Helena Circle	Opposed to Fitschen Ranch Rezoning
17)	4/25/2021	email	Marianne Koepnick	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
18)	4/26/2021	phone	Marily Leuer	Not identified	General Housing Element questions
19)	4/26/2021	email	Mary Beth Felcyn	Featherhill	Opposed to Tropical Plaza Rezoning & Prefers Town Center & Grave Pit
20)	4/26/2021	email	Dotty Farry	Fredrick Drive	Opposed to Fitschen Ranch Rezoning
21)	4/26/2021	email	Louis Pintola	Lincoln Street	Opposed to Fitschen Ranch Rezoning
22)	4/26/2021	email	Mike/Sharon Houlihan	Albany Circle	Opposed to Fitschen Ranch Rezoning
23)	4/26/2021	email	Ana Sandru	Not identified	Opposed to Fitschen Ranch Rezoning
24)	4/26/2021	email	Bob Goldberg	Not identified	Opposed to Fitschen Ranch Rezoning
25)	4/27/2021	email	Mary Beth Felcyn	Featherhill	Questions about Tropical Plaza
26)	4/27/2021	email	Mark Kuli	Helena Circle	Opposed to Fitschen Ranch Rezoning
27)	4/26/2021	email	Keith Stoner	Miller Circle	Opposed to Fitschen Ranch Rezoning
28)	4/27/2021	email	Paul DeMarco	Not identified	Opposed to Fitschen Ranch Rezoning
29)	4/27/2021	email	Wayne Silzel	Montana Circle	Housing Element clarification
30)	4/27/2021	email	Donald V. Moser	Not identified	Opposed to Fitschen Ranch Rezoning
31)	4/27/2021	email	Ellen Turco	Prado Woods	Opposed to Fitschen Ranch Rezoning
32)	4/27/2021	email	Mr/Mrs De Marco	Beardsley Circle	Opposed to Fitschen Ranch Rezoning
33)	4/28/2021	email	Natalie Ulery	Not identified	Opposed to Fitschen Ranch Rezoning
34)	4/28/2021	email	Maggie/Lance Kim	Dorothy Circle	Opposed to Fitschen Ranch Rezoning
35)	4/27/2021	email	Vicki Moreno	Fredrick Drive	Opposed to Fitschen Ranch Rezoning
36)	4/28/2021	email	Susana Powell	Wulff Drive	Opposed to Fitschen Ranch Rezoning
37)	4/29/2021	letter	John Belovsky	Jackson Ave, Ora	Opposed to Fitschen Ranch Rezoning
38)	4/29/2021	letter	Alice Belovsky	Portsmouth Cir	Opposed to Fitschen Ranch Rezoning
39)	4/29/2021	Phone	Robert Cano	Patrician Drive	Opposed to VP Road Rezoning
40)	4/29/2021	email	Thomas F. Nixon	Not identified	Questions regarding the proposals
41)	4/29/2021	email	Kellie Moore	Not identified	Wanda Road petroleum line
42)	4/29/2021	email	Ann Sanmartini	Covington Circle	Opposed to Fitschen Ranch Rezoning
43)	4/29/2021	phone	Bridget Harness	Patrician Drive	Questions about Update process/options
44)	4/29/2021	email	John Sanmartini	Covington Circle	Opposed to Fitschen Ranch Rezoning
45)	4/29/2021	email	Ed Curtis	Not identified	Opposed to Fitschen Ranch Rezoning
46)	4/29/2021	email	Melinda Masters	Beckley Circle	Opposed to Fitschen Ranch Rezoning
47)	5/1/2021	email	Efrem Joelson	Providence Drive	Opposed to Fitschen Ranch Rezoning
48)	5/1/2021	email	Donna Buxton	Dodson Way	Suggested public hearing sites
49)	5/3/2021	email	Donna Buxton	Dodson Way	Requested Housing Element information

	Date	Source	Initiator	Address	Comment
50)	5/1/2021	email	Doug & Liz Riede	Rosanne Circle	Opposed to Fitschen Ranch Rezoning
51)	4/30/2021	email	Dave Grass	CCS Computer Svc	Passage of ACA7
52)	5/2/2021	email	Steve/Birgit Miller	Not identified	Question regarding 8,000-sf threshold
53)	5/3/2021	phone	Brad Reese	Mountain View	Questions on process
54)	5/3/2021	email	Gina Van Fleet	Not identified	Support Gravel Pit option & possibly Town Center & opposes other options
55)	5/3/2021	email	Maria Pangelinan	Brynmar Drive	Opposed to Tropical Plaza Rezoning
56)	5/3/2021	email	Bruce Kellar	Not identified	Opposed to Fitschen Ranch Rezoning
57)	5/3/2021	email	Dave Hanson	Serrano	Priority of options
58)	5/4/2021	email	Carmen Garcia	Brynmar	Opposed to Tropical Plaza Rezoning
59)	5/4/2021	email	Scott Findlay	Not identified	Opposed to Fitschen Ranch Rezoning
60)	5/4/2021	email	Fred/Louise Alexander	Brynmar Drive	Priority of options
61)	5/5/2021	phone	Nancy Lynch	Sycamore Drive	Opposed to Gravel Pit rezoning
62)	5/3/2021	email	Dr/Mrs. Neil Harness	Patrician Drive	Opposed to Gravel Pit rezoning
63)	5/3/2021	email	Melissa Helffrich	Beardsley Circle	Opposed to Fitschen Ranch Rezoning
64)	5/3/2021	email	Roger von Ting	Camden Circle	Opposed to Gravel Pit Rezoning
65)	5/3/2021	email	Greg Masters	Beckley Circle	Opposed to Fitschen Ranch Rezoning
66)	5/3/2021	email	Danie Spence	Not identified	Opposed to Fitschen Ranch Rezoning & support Gravel Pit as least impact
67)	5/3/2021	email	Henry/Eileen Cohen	Brynmar Lane	Priority of options
68)	5/3/2021	email	Wayne Silzel	Montana Circle	Shared email from Gwen MacAloney suggesting small groups of meetings on the issue
69)	5/3/2021	email	Dowling Tsai	Beckley Circle	Input on Housing Element Options & Opposed to Fitschen Ranch Rezoning
70)	5/4/2021	email	Paul Baumann	Not identified	Opposed to Fitschen Ranch Rezoning
71)	5/4/2021	email	Barry Denes	Not identified	Suggests rezoning & that all newly rezoned & future developments on newly rezoned areas be subject to voter referendum by the residents
72)	5/4/2021	email	Brian/Carolyn Watts	Maybury Ranch	Pay to build affordable housing in another City on behalf of VP - Opposed to affordable housing in VP
73)	5/4/2021	phone	Ed Loftus	Villa Drive	Opposed to rezoning within residential neighborhoods - Opposed to using 11 underdeveloped/vacant lots
74)	5/5/2021	email	Sandra Poiser	Not identified	Opposed to Fitschen Ranch Rezoning & Villa Park Road Rezoning
75)	5/7/2021	email	Mary Beth Felcyn	Featherhill	Prefers Gravel Pit & Town Center options & Opposes Tropical Plaza Rezoning
76)	5/7/2021	mail	Cathy Trinh	Featherhill	Opposed to Tropical Planning Rezoning & prioritizes options
77)	5/7/2021	mail	Carol/Jack Stevens	Featherhill	Prioritizes Gravel Pit & Town Center & opposes other options
78)	5/7/2021	email	Dan Vu	Featherhill	Opposes Fitschen Ranch Rezoning & Tropical Nursery Rezoning & provides priority to other options
79)	5/7/2021	email	Mary Silzel	Montana Circle	Suggested clarification for public
80)	5/7/2021	fax	Arjun/Renee Mente	Loma Street	Expressing option preferences
81)	5/7/2021	email	Thomas Nixon	Not identified	Comments on each option
82)	5/8/2021	email	Mary Beth Felcyn	Featherhill	Supports Gravel Pit as best option
83)	5/8/2021	email	Roberta Prettyman	Hastings Drive	Opposed to Fitschen Ranch Rezoning
84)	5/8/2021	email	Erin Bartolucci	Not identified	Opposed to Fitschen Ranch Rezoning
85)	5/7/2021	email	Tom Capalbo	Dorothy Circle	Opposed to Fitschen Ranch Rezoning
86)	5/9/2021	email	Donna Buxton	Dodson	Opposed to Tropical Plaza Rezoning & Supports Gravel Pit Rezoning & Wants Commercial preserved in Town Center if Rezoned
87)	5/10/2021	email	Mr/Mrs Schimmel	Not identified	Opposed to Fitschen Ranch Rezoning
88)	5/8/2021	email	Bob Derifield	Covington Circle	Questions regarding Housing Element

	Date	Source	Initiator	Address	Comment
89)	5/10/2021	mail	Sotirios Zafiris	Featherhill	Priority ranking of housing options
90)	5/10/2021	mail	Patricia Zafiris	Featherhill	Priority ranking of housing options
91)	5/10/2021	email	Mary Silzel	Montana Circle	Supports development of Villa Park Road senior housing facility
92)	5/10/2021	email	Mr/Mrs Watkins	Leatrice Drive	Supports Villa Park Road Rezoning
93)	5/10/2021	email	Mr/Mrs Canuso	Featherhill Drive	Prefer Villa Park Road option & portion of Town Center rezoning & opposed to Tropical Plaza Rezoning
94)	5/10/2021	email	Mr/Mrs Miller	Mesa Drive	Oppose reducing residential lot sizes for E4 lots & provides preferred options
95)	5/10/2021	email	Mr/Mrs Handorf	Aberdeen Lane	Opposes Fitschen Ranch Rezoning
96)	5/10/2021	email	Mr/Mrs Everett	Cedarhill Circle	Opposes Fitschen Ranch Rezoning
97)	5/10/2021	email	Dr. Rangwala	Not identified	Opposes Fitschen Ranch Rezoning
98)	5/10/2021	email	Stephen Miller	Mesa Drive	Spread density change evenly by revising all E-4 lots to minimum size
99)	5/10/2021	email	John Hoganson	Not identified	Question as to Fitschen Ranch fencing
100)	5/10/2021	email	Mr/Mrs Miller	Mesa Drive	Support Villa Park Road option
101)	5/10/2021	email	Sharon Jory	Albany Circle	Opposes Fitschen Ranch Rezoning
102)	5/10/2021	email	Eric Wong	Not identified	Opposes Fitschen Ranch Rezoning
103)	5/10/2021	email	Joyce Wilson	Not identified	Supports Senior housing & Villa Park Road as first preferred option
104)	5/10/2021	email	Erica Wright	Providence Drive	Opposes Fitschen Ranch Rezoning
105)	5/10/2021	email	Wes Miyake	Helena Circle	Opposes Fitschen Ranch Rezoning
106)	5/10/2021	email	Roger Fischen	Lincoln Street	Opposes Fitschen Ranch Rezoning
107)	5/10/2021	email	Jessica Chiang	Featherhill Drive	Priorities of options, with Gravel Pit the highest preference
108)	5/10/2021	email	Cheryl Witt	Not identified	Opposes Fitschen Ranch Rezoning
109)	5/10/2021	email	Roy/Lynn Herndon	Brynmar Drive	Priorities of options, with Gravel Pit the highest preference
110)	5/10/2021	email	Kirk McMullin	Valencia Drive	Priorities of options, with Gravel Pit the highest preference
111)	5/10/2021	email	Ruben Ibarra	Aberdeen	Opposes Fitschen Ranch Rezoning
112)	5/11/2021	email	David Carson	Rosanne Circle	Opposes Fitschen Ranch Rezoning
113)	5/11/2021	phone	David Metcalf	Not identified	Opposes zoning changes for VP
114)	5/11/2021	email	Ann & Phedre Loren	Brynmar Drive	Priorities of options, with Gravel Pit the highest preference
115)	5/11/2021	email	Ryan Polk	Brynmar Drive	Priorities of options, with Town Center the highest preference
116)	5/11/2021	email	Wayne Silzel	Montana Circle	Support for Gravel Pit option
117)	5/11/2021	email	Mr/Mrs Vitthus	Cedarhill Circle	Opposes Fitschen Ranch Rezoning
118)	5/11/2021	email	Markovitz Family	Not identified	Opposes Fitschen Ranch Rezoning & provides priority options
119)	5/11/2021	email	Mark Kuli	Helena Circle	Stop Wanda Development update
120)	5/11/2021	letter	Mauricio Ospino	N Sacramento, Ora	Opposes Fitschen Ranch Rezoning
121)	5/11/2021	email	Jacqui Lawrence	Featherhill	Opposes Tropical Nursery Rezoning & prioritizes options
122)	5/11/2021	email	John Hoganson	Tacoma Circle	Opposes Fitschen Ranch Rezoning
123)	5/11/2021	email	Riki Brophy	Potter Circle	Opposes Fitschen Ranch Rezoning
124)	5/11/2021	email	Alan McNeeney	Beckley Circle	Opposes Fitschen Ranch Rezoning
125)	5/11/2021	email	Nicole Stepanian	Lincoln Street	Opposes Fitschen Ranch Rezoning
126)	5/11/2021	email	Erick Pulido	Serrano Ave	Questions on Housing Element
127)	5/11/2021	email	David/Esther Kim	Villa Woods Cir	Opposes State Housing law & preferences for Tropical Plaza & Villa Park Road options
128)	5/11/2021	email	Jay/Christina Kimble	Dodson Way	Priorities of options, with Gravel Pit as priority
129)	5/11/2021	email	Debbie Girgenti	Not identified	Opposes Fitschen Ranch Rezoning
130)	5/11/2021	mail	Donel Belorsky	Jackson Ave, Ora	Opposes Fitschen Ranch Rezoning
131)	5/11/2021	mail	Michele Hirota	Cedarhill Circle	Opposes Fitschen Ranch Rezoning

	Date	Source	Initiator	Address	Comment
132)	5/11/2021	mail	Lori Picco	Santiago	Opposes Fitschen Ranch Rezoning
133)	5/11/2021	mail	Billie O'Brien	Locust Ave, Ora	Opposes Fitschen Ranch Rezoning
134)	5/11/2021	email	Mr/Mrs Goodman	Radec Ct	Questions & Opposes Fitschen Ranch Rezoning
135)	5/12/2021	email	Roger Chang	Dodson Way	Opposes Tropical Nursery Rezoning & Supports Gravel Pit & Town Center
136)	5/21/2021	email	Bryce Lagsdin	Not identified	Opposed to low income housing in VP

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Appendix C Fair Housing Assessment

Assembly Bill (AB) 686 requires housing elements to contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

Under California law, AFFH means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

To comply with AB 686, the City has completed the following outreach and analysis.

1. Outreach

As discussed in the Public Participation appendix, early in the Housing Element update process the City developed a list of stakeholders with local expertise in housing issues, including fair housing. The stakeholder list included local service providers, affordable housing developers, and fair housing organizations in an effort to include the interests of lower-income residents and persons with special needs in the community.

Over the course of the Housing Element update process the City conducted a series of public meetings. Public notice of each meeting was posted on the City’s dedicated Housing Element website and was also sent directly to persons and organizations on the stakeholder list. Public meetings were held both online and in person to encourage those with mobility difficulties to participate. Agendas and other information for each meeting was posted on the City website to allow interested stakeholders to access this information throughout the process. Interested persons were also encouraged to provide input or ask questions via telephone or email. Please refer to Appendix B for additional information regarding the outreach efforts and how public input was incorporated into the Housing Element. Information was made available in both English and Spanish.

In addition to public workshops and hearings, the City also directly contacted housing advocates, housing service providers, and community organizations who serve the interests of lower-income households and special needs groups to solicit comments on housing needs, barriers to fair and affordable housing, and opportunities for development.

To encourage continuing stakeholder involvement in local housing issues throughout the planning period, Program 6 includes a commitment to conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

2. Fair Housing Assessment

This section provides an assessment of fair housing issues in Villa Park including fair housing enforcement and outreach capacity, patterns of integration and segregation, racial or ethnic patterns of concentration, disparities in access to opportunities, and disproportionate housing needs, including displacement risk.

A. Fair Housing Enforcement and Outreach Capacity

The primary fair housing organization serving Villa Park is the Fair Housing Council of Orange County (<https://www.fairhousingoc.org/>). The FHCOC was formed in 1965 in the wake of the civil rights movement that resulted in the Civil Rights Act of 1964. FHCOC incorporated in 1968, the same year that Congress extended civil rights protections to cover housing with the adoption of the Fair Housing Act. Under the direction of a volunteer board of directors and staff, the agency works to fulfill a mission of protecting the quality of life in Orange County by ensuring equal access to housing opportunities, fostering diversity and preserving dignity and human rights. An operating member of the National Fair Housing Alliance, the FHCOC works 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. Services provided by the Fair Housing Council include fair housing enforcement and education, landlord/tenant counseling, mediation and homebuyer HUD counseling, which includes first-time homebuyer education and mortgage default counseling. Services are available to low-to-moderate income clients free of charge and to others for a moderate donation. Services are available in English, Spanish, and Vietnamese.

Orange County

The County of Orange acts as lead agency for the “Urban County,” which includes 21 non-entitlement cities. Villa Park is a participating city in the Urban County Program. The most recent Orange County Analysis of Impediments to Fair Housing Choice (the “AI”) was adopted in June 2020 and includes a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards the County’s obligation to affirmatively further fair housing. The Lawyers’ Committee for Civil Rights Under Law (Lawyers’ Committee), in consultation with Orange County jurisdictions and with input from a wide range of stakeholders through a community participation process, prepared the AI. To provide a foundation for the conclusions and recommendations presented in this AI, the following information was reviewed and analyzed:

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

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

To ensure that the analysis contained in the AI truly reflects conditions in the community and that the goals and strategies are targeted and feasible, the participation of a wide range of stakeholders is of critical importance. A broad array of outreach was conducted through community meetings, focus groups, and public hearings.

In preparing the AI, the Lawyers' Committee reached out to tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal services providers, social services providers, housing developers, and industry groups to hear directly about fair housing issues affecting residents of Orange County.

Beginning in October 2019, the Lawyers' Committee held meetings with individual stakeholders throughout the County. In January and February 2020, evening community meetings were held in Mission Viejo, Westminster/Garden Grove, Santa Ana, and Fullerton. Also in February, the Lawyers' Committee held a focus group with a wide array of nonprofit organizations and government officials.

Geographically specific community meetings were held across Orange County, including the South, West, Central, and North parts of the County. Additional outreach was conducted for members of protected classes, including the Latino and Vietnamese communities. All community meetings had translation services available if requested in Spanish and Vietnamese. In addition, all meetings were held in locations accessible to people with mobility issues. The Executive Summary of the AI was translated into Spanish and Vietnamese. Public hearings and City Council meetings were held throughout the County.

The County AI describes the departments and organizations that handle fair housing enforcement and outreach in Orange County. The California Department of Fair Employment and Housing (DFEH) investigates complaints of employment and housing discrimination. The Fair Housing Council of Orange County (FHCOC) provides services throughout the Urban County, including Villa Park, to ensure equal access to housing. FHCOC's services include outreach and education, homebuyer education, mortgage default counseling, landlord-tenant mediation, and limited low-cost advocacy. The Fair Housing Council investigates claims of housing discrimination and assists with referrals to DFEH. Community Legal Aid SoCal is a legal service provider serving low-income people in Orange County and Southeast Los Angeles County.

The 2020 Orange County AI reported that:

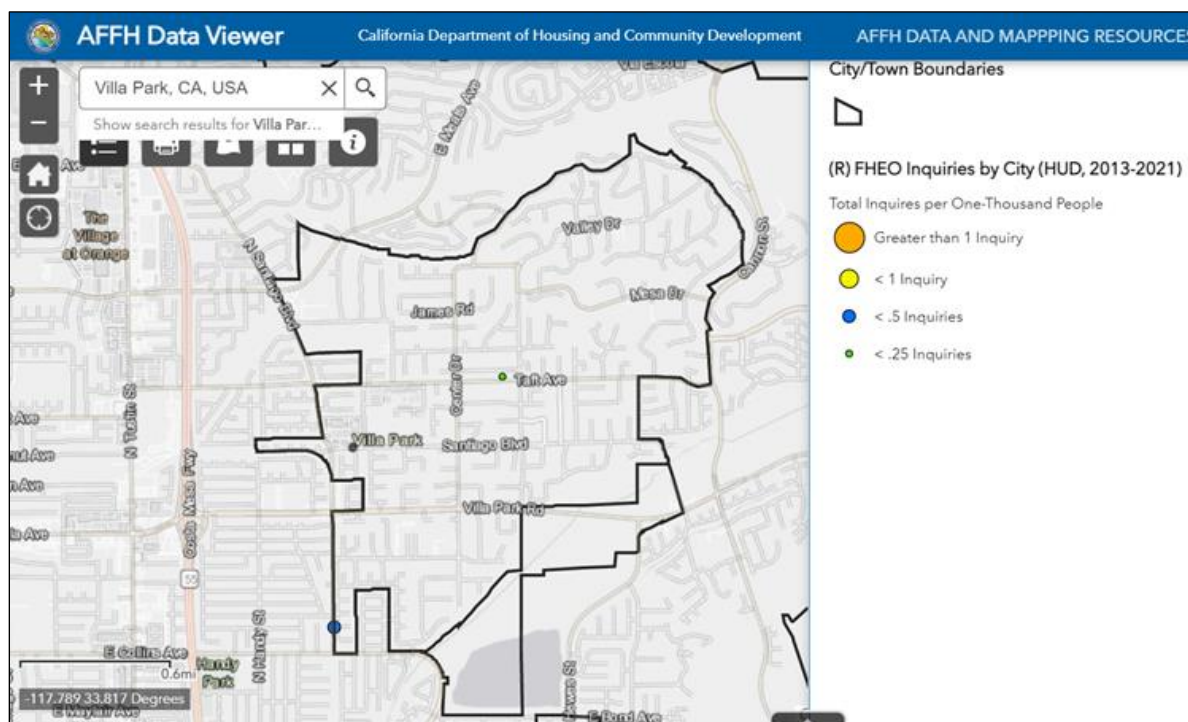
- FHCOC regionally conducted or participated in 467 education and/or outreach activities. Regionally, over 9,550 people were served by these activities. Through its various regional outreach efforts FHCOC distributed over 82,130 pieces of literature on fair housing, its services and other housing-related topics. Additionally, throughout Orange County FHCOC held 32 training sessions for rental property owners/managers. FHCOC presented 16 fair housing seminars, 70 general fair housing workshops
- On a regional basis, FHCOC staff received 363 allegations of housing discrimination and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. FHCOC also conducted 362 systemic onsite tests, either paired or 'sandwich', 51 tests occurring in the jurisdiction and 215 other testing activities.

- On a regional basis, activities provided by FHCOG included assisting 7,664 unduplicated households addressing 24,766 issues, disputes and/or inquires.

City of Villa Park

As seen in Figure C-1, the HCD AFFH Data Viewer reported a Fair Housing Enforcement and Outreach (FHEO) inquiry rate of less than 0.25 per 1,000 persons for the 2013-2021 period in Villa Park.

Figure C-1: FHEO Inquiries – Villa Park



The Constraints section of this Housing Element describes ways that the City works to address potential impediments to fair housing choice. The City continues to contract with the FHCOG to implement the regional Fair Housing Plan (AI) and to offer fair housing services and tenant/landlord counseling to residents.

B. Patterns of Integration and Segregation

1) Race and Ethnicity

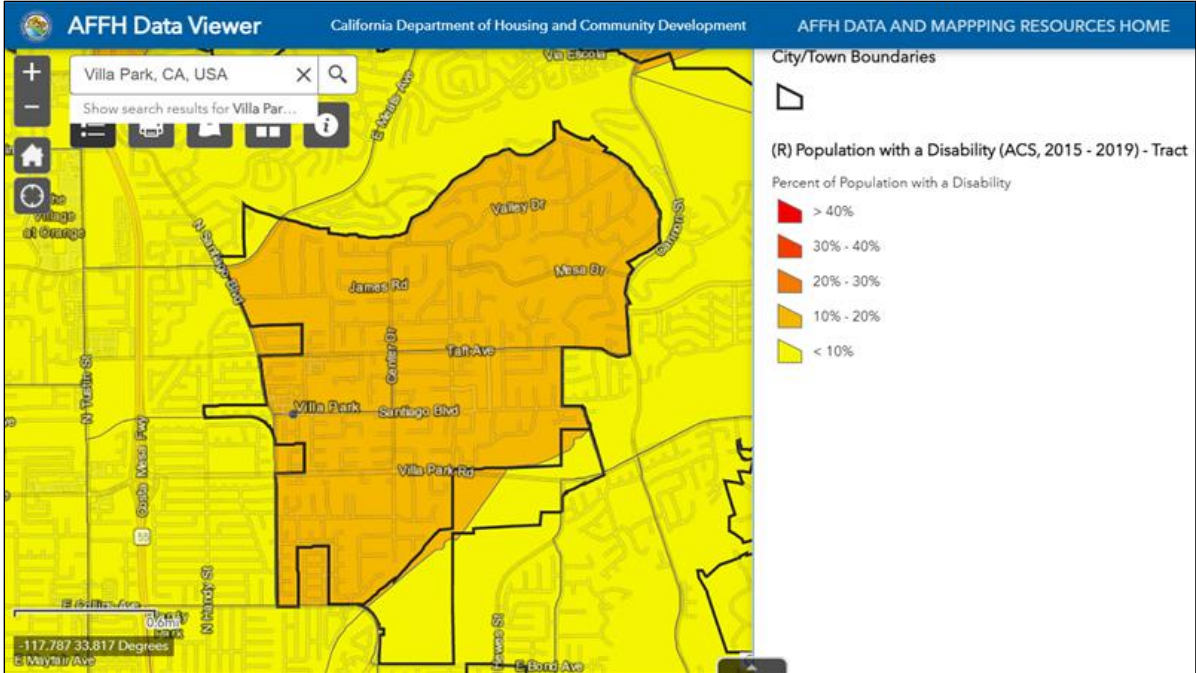
As seen in Figure C-2, the percentage of non-white population in nearly all portions of Villa Park is 21% to 40%, which is lower than most areas to the north, west and south and similar to the adjacent unincorporated area of Orange Park Acres to the east. In describing the County-wide racial and ethnic make-up, the County AI (p. 122) states that, "In general, White residents tend to reside towards the outer edges of the county, while Hispanic and sometimes Asian residents are found more in the center of the county." This countywide distribution is illustrated in Figure C-3.

2) Persons with Disabilities

As shown on Figure C-4, Villa Park residents experience higher disability rates (10-20%) than the surrounding areas, which are less than 10%.

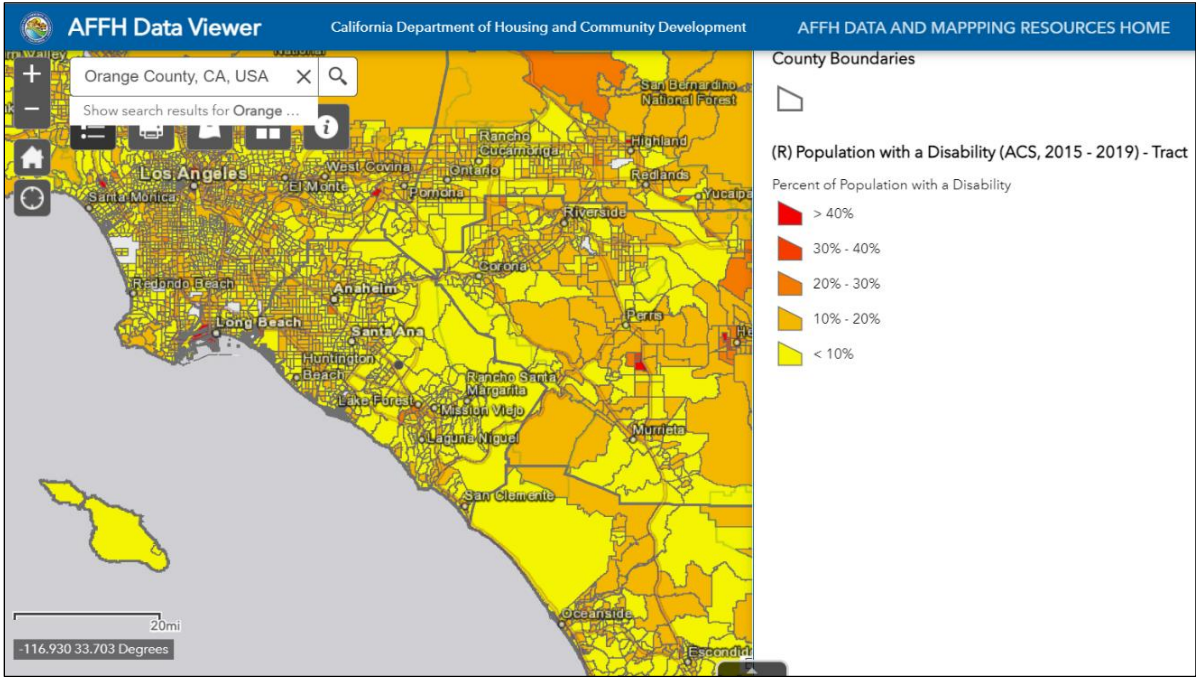
Additional data regarding persons with disabilities by disability type in Villa Park is provided in Chapter II: Housing Needs Assessment. Some individuals may experience more than one disability, and some disability types are not recorded for children below a certain age. The California Department of Developmental Services (DDS) estimates that there are approximately 869 persons with developmental disabilities within the ZIP code that encompass the City of Villa Park.

Figure C-4: Population with a Disability – Villa Park



The Orange County AI discusses disability information countywide. According to the AI, “Communities with higher concentrations of persons with disabilities are somewhat more likely to be located in the more racially and ethnically diverse northern portion of the county than they are in the southern portion of the county” (see Figure C-5). This is reflected in the fact that six of the eight cities that have higher concentrations of persons with disabilities are in northern Orange County.

Figure C-5: Population with a Disability – Orange County



The housing needs of persons with disabilities vary, but generally include accessible and affordable housing, and access to supportive services. More severely disabled individuals may require a group living environment where supervision is provided, and the most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. The City of Villa Park facilitates housing for persons with disabilities through its Reasonable Accommodation procedures and regulations to encourage production of residential care facilities and supportive housing. According to the California Department of Social Services database there are currently eight assisted living facilities in Villa Park.

3) Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns.

Single-parent households are also protected by fair housing law. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. As discussed in the Housing Needs Assessment, 4.9% of Villa Park households are female-headed (compared to 14.3% in the SCAG region), 1% are female-headed and with children (compared to 6.6% in the SCAG region), and there are no female-headed households with children under 6 (compared to 1.0% in the SCAG region). Figure C-6 shows the percentage of children living in married couple households in Villa Park while Figure C-7 shows similar data for the county as a whole.

Figure C-6: Percentage of Children in Married Couple Households – Villa Park

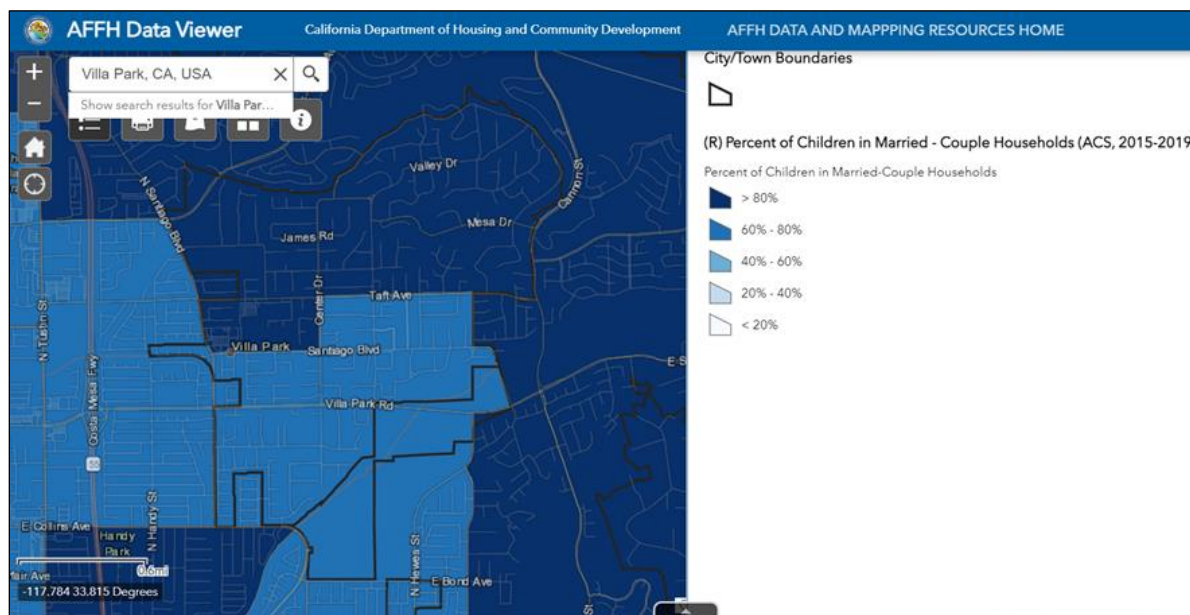
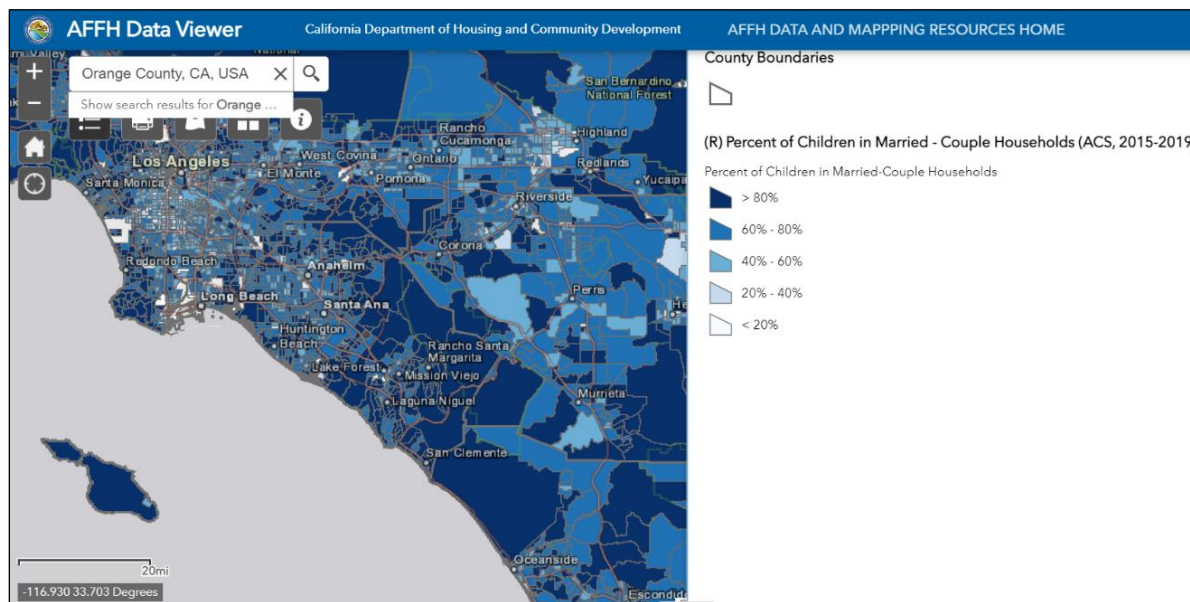


Figure C-7: Percentage of Children in Married Couple Households – Orange County



4) Income

Identifying low/moderate-income (LMI) areas is an important aspect in understanding 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 AMI). Figure C-8 shows that the central and northeastern portions of Villa Park have fewer than 25% of the population within LMI groups, while the western and southern portions of the city have 25% to 50% LMI households.

Countywide, Figure C-9 shows that larger LMI concentrations are located in the central portion of the county to the west of Villa Park.

Figure C-8: Low/Moderate Income Population – Villa Park

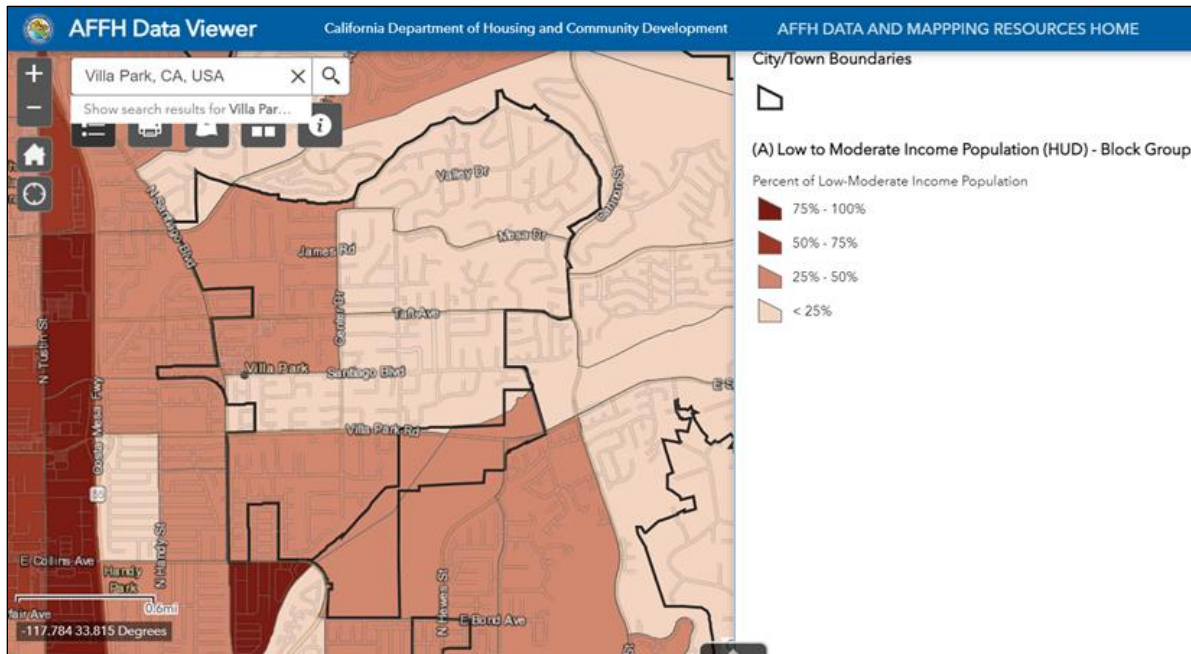
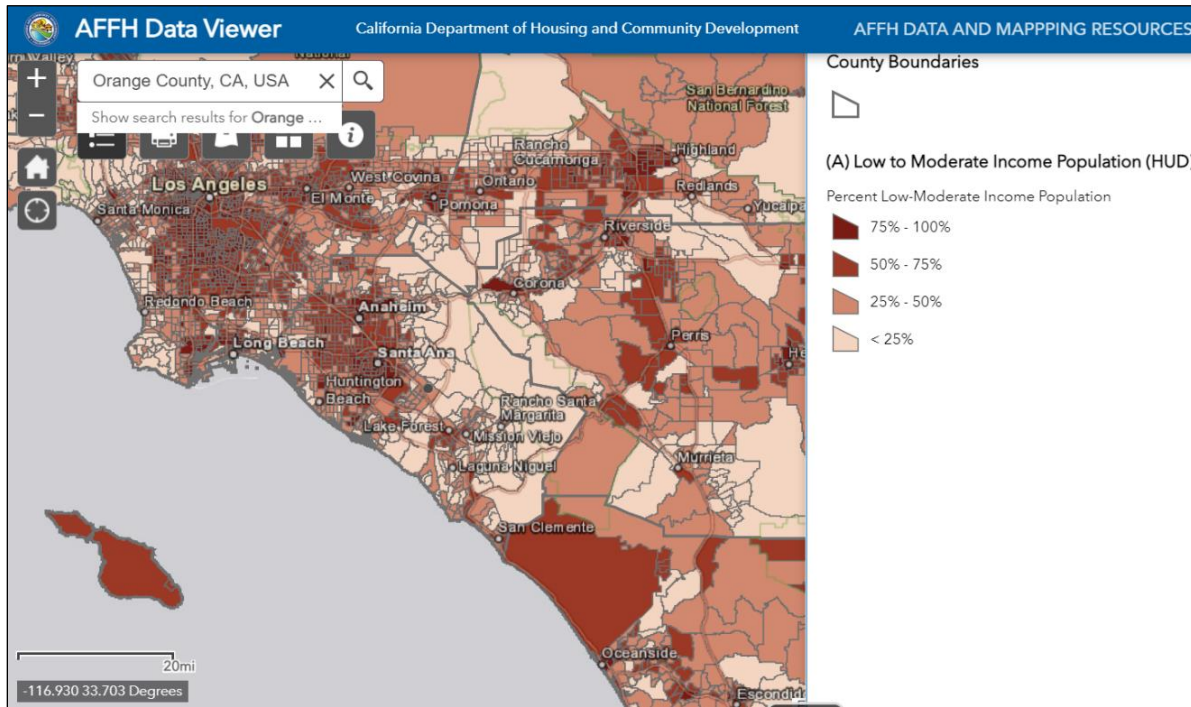


Figure C-9: Low/Moderate Income Population – Orange County



C. Racially/Ethnically Concentrated Areas

1) Racially/Concentrated Areas of Poverty

According to HUD, a racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50% or more of the population identifies as non-White and 40% or more of residents are living in poverty. As shown in Figure C-10, there are no designated R/ECAP areas in Villa Park. The nearest R/ECAP areas are in the City of Santa Ana approximately 5 miles to the southwest of Villa Park (Figure C-11).

Figure C-10: Racially/Ethnically Concentrated Areas of Poverty – Villa Park

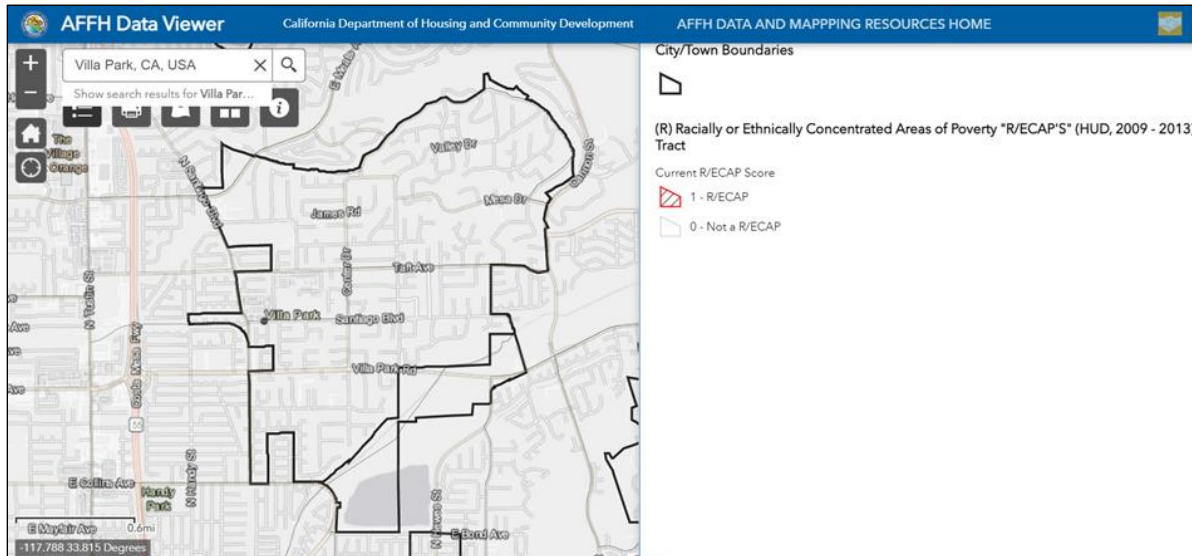
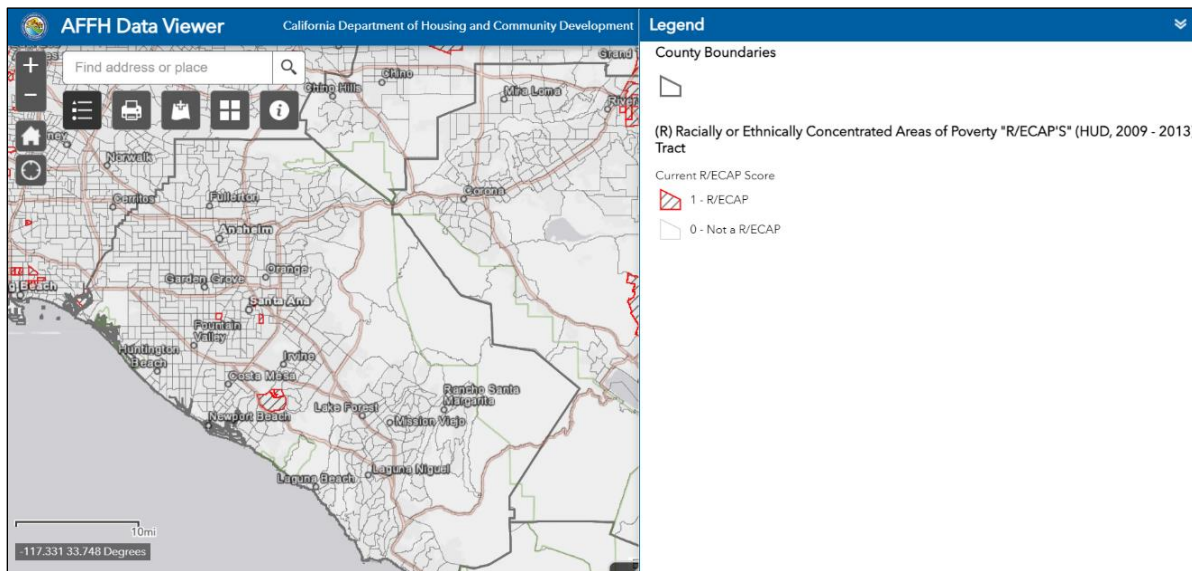
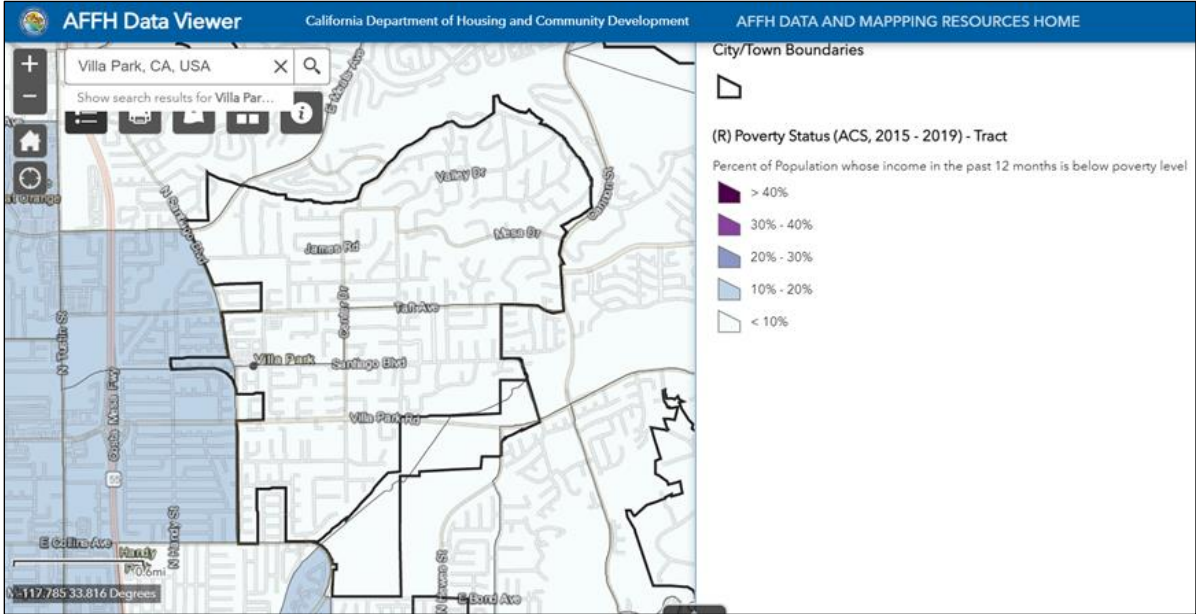


Figure C-11: Racially/Ethnically Concentrated Areas of Poverty – Orange County



Recent Census estimates regarding the poverty status of Villa Park households are shown in Figure C-12. As seen in this map, the poverty rate is less than 10% in nearly all portions of the city, although one small area on the western edge of the city has a poverty rate of 10% to 20%. Poverty rates in Villa Park are similar to the adjacent areas of Anaheim, eastern Orange and the Orange Park Acres unincorporated area, while the portion of Orange to the west of Villa Park has a higher poverty rate of 10% to 20%.

Figure C-12: Poverty Status – Villa Park



Program 6 in the Housing Plan includes supporting FHCOC in providing training to landlords on requirements under fair housing law, such as the acceptance of Housing Choice Vouchers, and programs such as Program 1: Adequate Sites to Accommodate Regional Housing Needs, Program 2: Accessory Dwelling Units, Program 3: Facilitate Housing Development for All Economic Segments of the Community, and Program 4 Housing for Persons with Disabilities and Other Special Needs will help to expand affordable housing resources for lower-income households in the city.

2) Racially/Concentrated Areas of Affluence

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices.” Therefore, both sides of the continuum must be examined. While HCD does not provide a standard definition for RCAAs and the HCD Data Viewer does not currently provide RCAA maps, available data regarding the percentage White population and median household income can provide insight into racially concentrated areas of affluence.

Table C-1 compares the median household incomes of White/non-Hispanic residents in Villa Park and Orange County as a whole to the median incomes for the total population of the city and county. This table shows that in Villa Park, the median income for non-Hispanic White households is about 4% lower than for the city’s population as a whole. Countywide, the median income for non-Hispanic White households is about 13% higher than for the population as a whole. These data suggest that there is less racial concentration of affluence in Villa Park than in Orange County as a whole.

Table C-1: Median Household Income by Race – Villa Park and Orange County

Median Household Income	Villa Park	Orange County
<u>White Alone (not Hispanic)</u>	<u>\$158,464</u>	<u>\$101,958</u>
<u>All Households</u>	<u>\$165,000</u>	<u>\$90,234</u>

Source: U.S. Census ACS 2016-2020
 B19013 (all)
 B19013H (white alone, not Hispanic)

D. Disparities in Access to Opportunity

1) Overview

California housing law requires cities to analyze disparities in access to opportunity as part of the fair housing assessment. The California Tax Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) have developed maps showing access to various types of opportunities such as education, economic, transportation, and environmental indicators.

2) Educational Opportunity

The County AI¹¹ describes disparities in access educational opportunities across Orange County. Countywide, there are disparities across racial/ethnic groups in access to educational opportunities as measured by the index. Across all tracts in Orange County, non-Hispanic Whites exhibit the highest exposure to educational opportunity (index score of about 59) and non-Hispanic Asians second highest (53). Hispanics have the lowest access to these opportunities (31), with non-Hispanic Blacks in between (46).

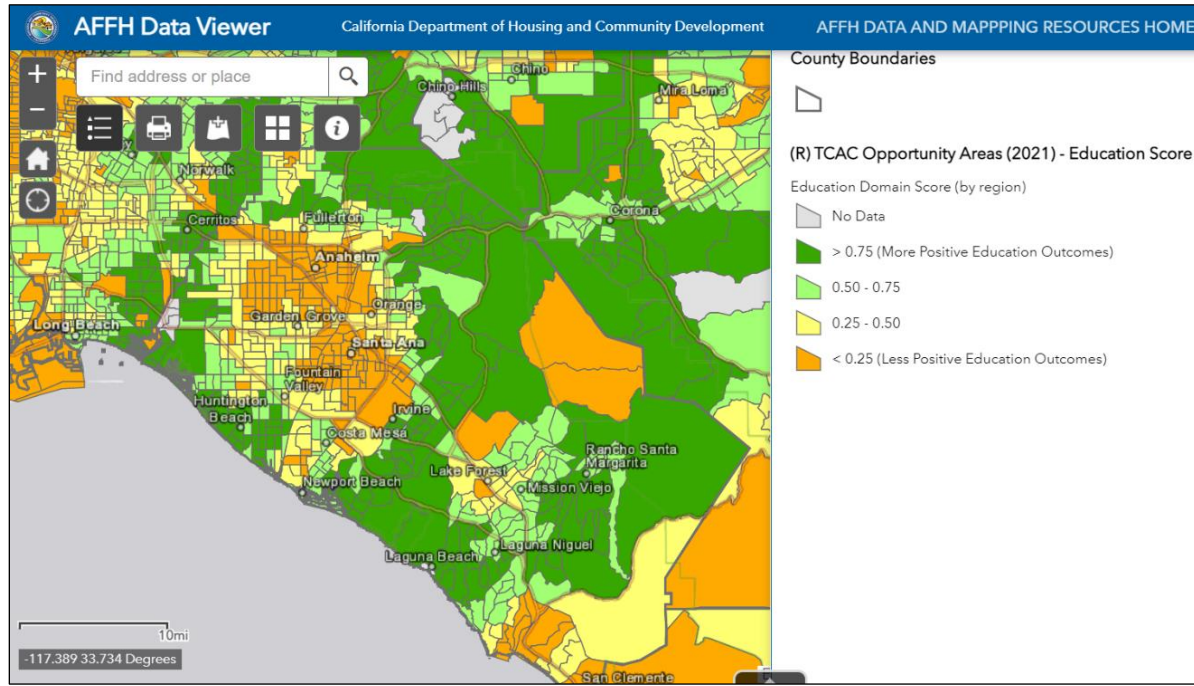
Several jurisdictions score highly (index values at or above 60) on educational opportunity across all racial categories. These cities include Aliso Viejo, Huntington Beach, Irvine, Laguna Niguel, La Palma, Mission Viejo, and Rancho Santa Margarita.

Jurisdictions with the highest educational opportunity also appear to have primarily large concentrations of non-Hispanic Whites and Asian/Pacific Islanders. Irvine, Aliso Viejo, and Huntington Beach are examples of cities with large populations of those two groups. Other high opportunity cities, by contrast appear more segregated and more heavily populated by non-Hispanic Whites. Rancho Santa Margarita and Mission Viejo are two examples of such places.

Educational opportunity scores for Orange County are shown in Figure C-13.

¹¹ P. 144

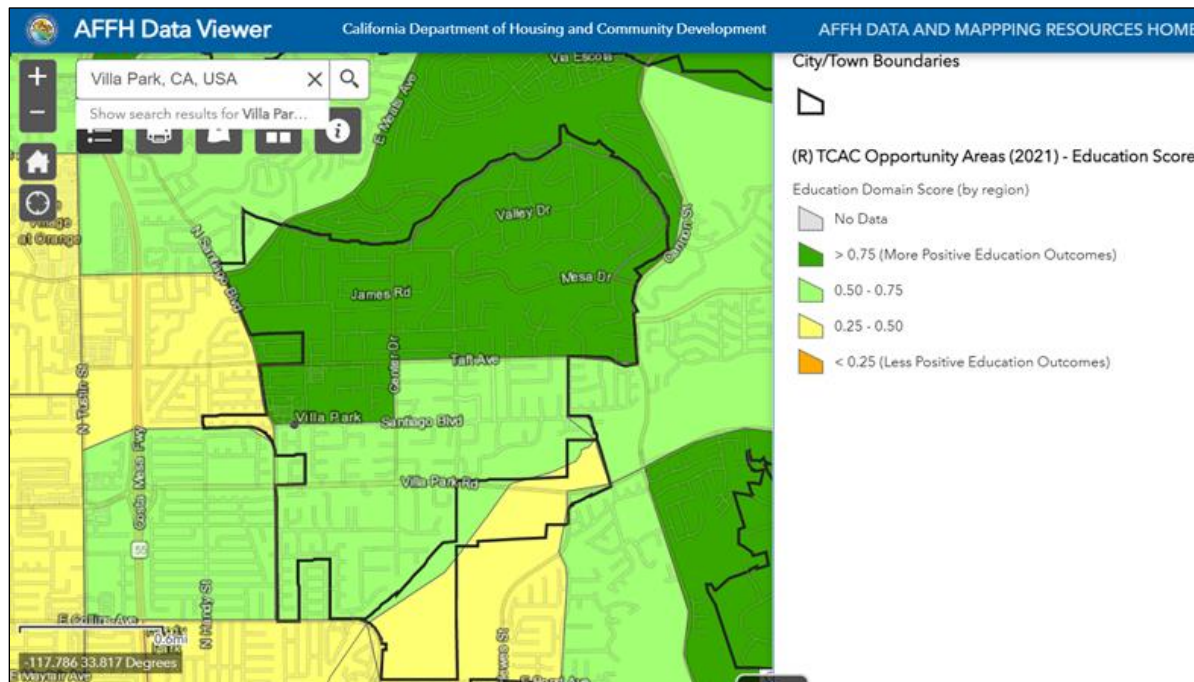
Figure C-13: TCAC Educational Opportunity Areas – Orange County



The City of Villa Park is within the boundaries of the Orange Unified School District, which serves approximately 28,000 K-12 students and also encompasses all or parts of the cities of Anaheim, Garden Grove, Orange, Santa Ana, and some unincorporated county areas.

As shown in Figure C-14, TCAC educational opportunity scores are highest in the northern portion of the city.

Figure C-14: TCAC Educational Opportunity Areas – Villa Park



3) Economic Opportunity

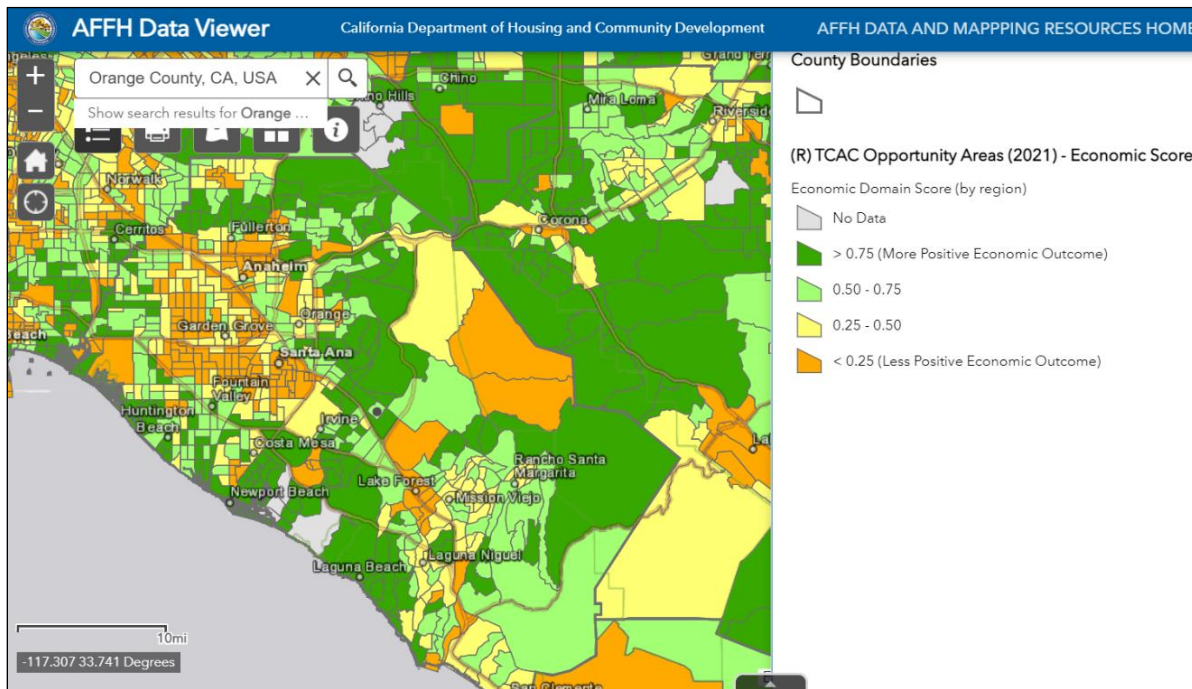
In Orange County, there are significant disparities in access to economic opportunity, as seen in Figure C-15. Non-Hispanic White residents have the greatest access to economic opportunity. Asian and Pacific Islander residents (49), Native Americans (46), and Black residents (46) have lower index scores in the high to mid-40s. Hispanic residents (32) have the lowest access to economic opportunity of all racial and ethnic groups in Orange County.

A number of jurisdictions have relatively little disparity between groups. There are high economic opportunity scores for all racial and ethnic groups in Aliso Viejo and Irvine (high 60s to low 70s). La Palma also has relatively high opportunity and little variation in scores between groups (index values ranging from 60 to 66). Huntington Beach, Laguna Niguel, Mission Viejo, and Rancho Santa Margarita have moderate economic opportunity scores for all racial/ethnic groups (scores from the mid-40s to mid-50s).

Economic Opportunity Index scores are generally lower in North Orange County than in South County. Scores are especially low in Westminster, Garden Grove, and much of Santa Ana and Anaheim. Scores are generally high in much of Irvine, La Palma, and Tustin and along the coast from Newport Beach to Laguna Niguel as well as in unincorporated areas near the eastern border with Riverside County.

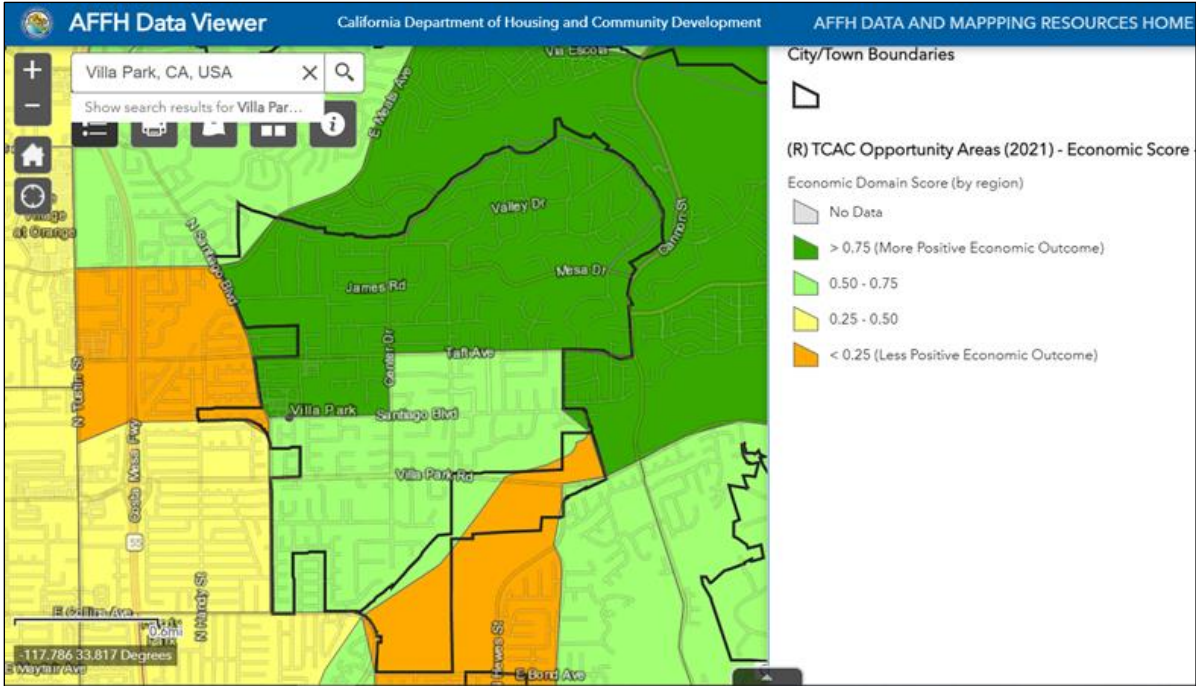
Areas in Orange County with the highest index scores tend to have large concentrations of non-Hispanic and Asian residents. By contrast, areas with the highest concentration of Hispanic residents tend to have lower economic index scores. Cities such as Fullerton and Costa Mesa are examples of localities with segregated living patterns and significant disparities between racial and ethnic groups. Neighborhoods in these cities with higher Hispanic populations score lower than neighborhoods that are heavily populated by non-Hispanic and Asian residents.

Figure C-15: TCAC Economic Opportunity – Orange County



In Villa Park, the highest economic opportunity scores are in the northern portion of the city (Figure C-16). This pattern is similar to educational opportunity scores.

Figure C-16: TCAC Economic Opportunity – Villa Park



4) Transportation Opportunities

According to the County AI, low transportation cost index scores as well as transit index scores are generally higher in North Orange County than in South Orange County. Scores are generally higher in jurisdictions with greater levels of density. In Villa Park, proximity to the SR-55 freeway and the OCTA bus route along Wanda Road/Santiago Boulevard provide access to regional transit options.

5) Environmental Opportunities

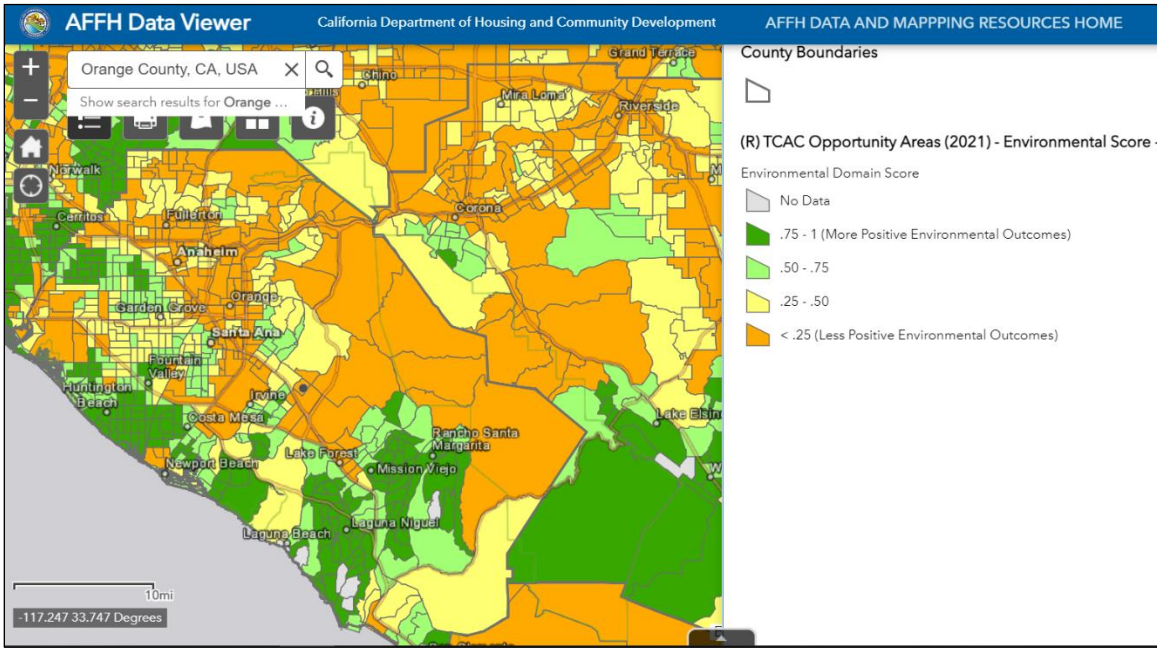
The County AI notes that there are disparities across racial/ethnic groups in access to environmental opportunities, measured as lower exposure to and effects from pollution (Figure C-17). Across all tracts in Orange County, non-Hispanic Whites exhibit the highest access to environmentally healthy neighborhoods (index score of about 54). All other racial/ethnic groups obtain lower index scores in the 40s: Hispanics score lowest at 41, followed by non-Hispanic Blacks (45), non-Hispanic Asian/Pacific Islander (47), and non-Hispanic Native American (48).

Several jurisdictions score especially highly on environmental opportunity across all racial categories. Laguna Niguel, Aliso Viejo, Mission Viejo, and Rancho Santa Margarita all have index scores in the 70s to 90s for all racial and ethnic groups. Fountain Valley and Huntington Beach also have higher access to environmental health, scoring in the 50s to low-70s on the index. Other cities are low-scoring across the board. Orange City, La Habra, and Fullerton are the least environmentally healthy, with index scores in the 20s. Anaheim, Buena Park, Irvine, Santa Ana, and Westminster also have low access to environmental opportunity, scoring in the 30s to 40s on the index.

Jurisdictions with the highest environmental opportunity appear to have primarily large concentrations of non-Hispanic Whites and Asian/Pacific Islanders. Laguna Niguel, Aliso Viejo, Fountain Valley, and Huntington Beach are good examples of cities with large populations of those two groups. Other high opportunity cities, by contrast appear more segregated and more heavily populated by non-Hispanic Whites. Rancho Santa Margarita, and Mission Viejo are two examples of such places.

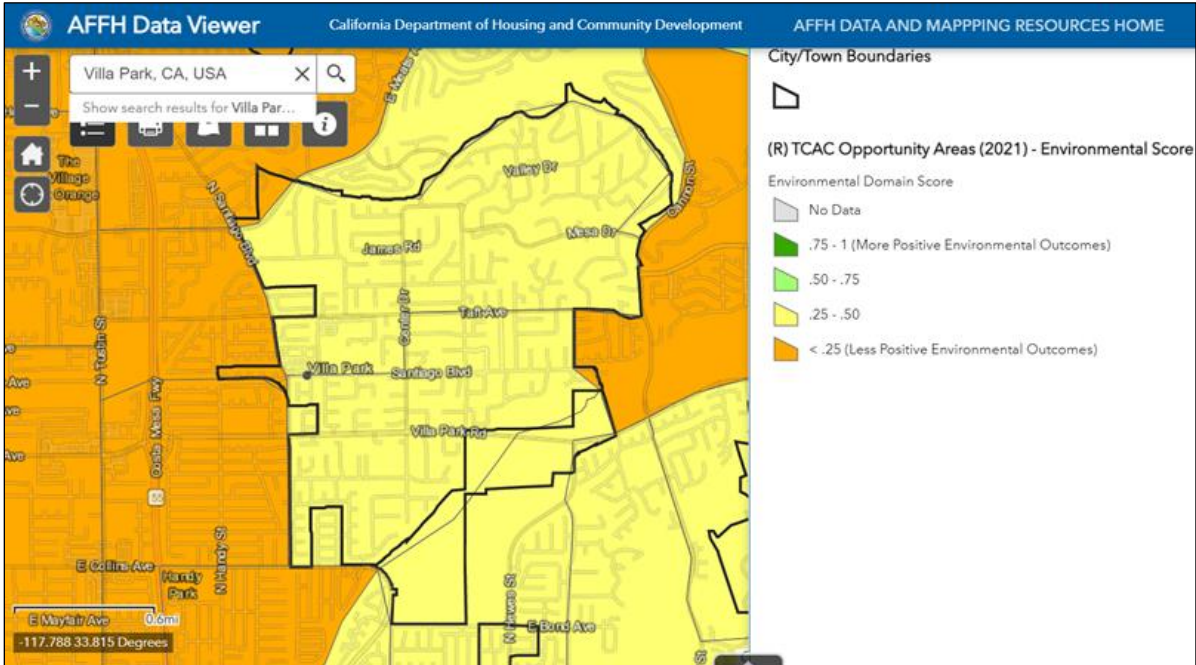
Lower-scoring cities exhibit a diversity of residential patterns. For example, Orange (city) has concentrations of both Hispanics and non-Hispanic Whites. Similarly, Fullerton has concentrations of Hispanic neighborhoods as well as non-Hispanic Whites and Asian/Pacific Islanders. Anaheim and La Habra follow a similar pattern. By contrast, Santa Ana is a city with low environmental quality that is characterized almost exclusively by dense concentrations of Hispanics.

Figure C-17: TCAC Environmental Opportunity – Orange County



In Villa Park, environmental opportunity scores are relatively low, ranging from 0.25 to 0.50 but are higher than adjacent areas to the east and west (Figure C-18).

Figure C-18: TCAC Environmental Opportunity – Villa Park



6) Disadvantaged Communities

Senate Bill 1000 (SB 1000) requires cities with designated disadvantaged communities to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities. CalEnviroScreen examines various indicators to characterize pollution and socioeconomic factors. As seen in Figure C-19 below, there are no designated disadvantaged communities in Villa Park. The nearest disadvantaged community is located in the City of Orange to the west (Figure C-20).

Figure C-19: Disadvantaged Communities – Villa Park

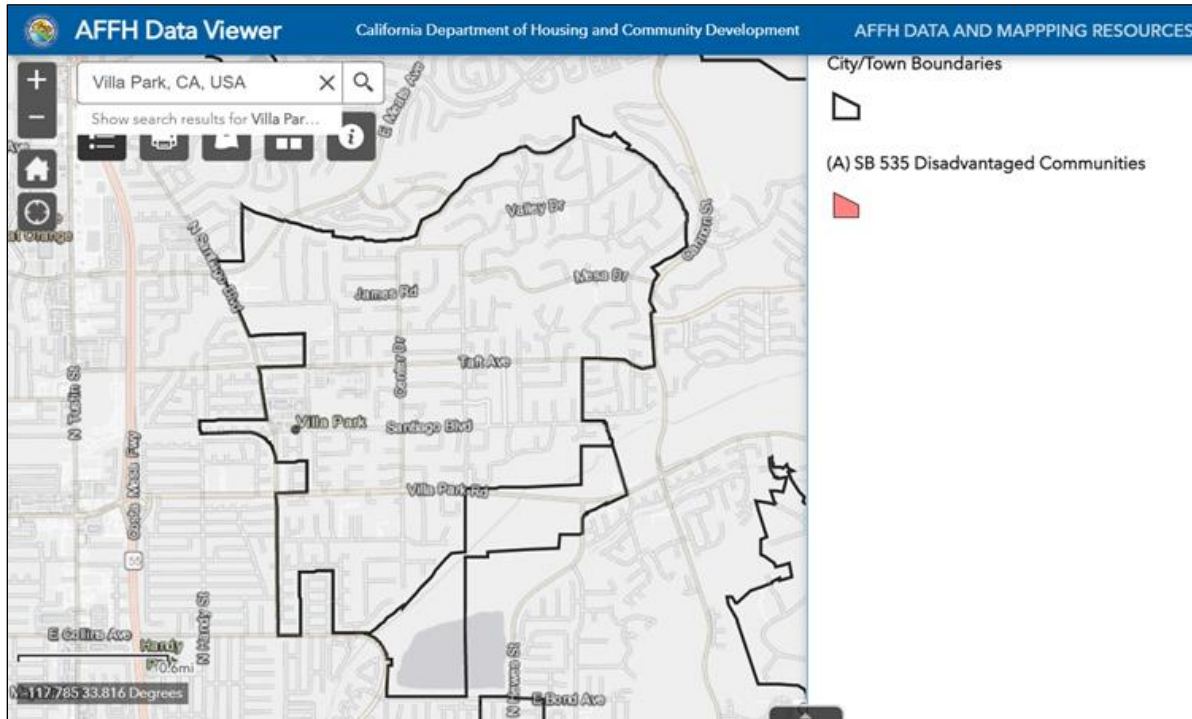
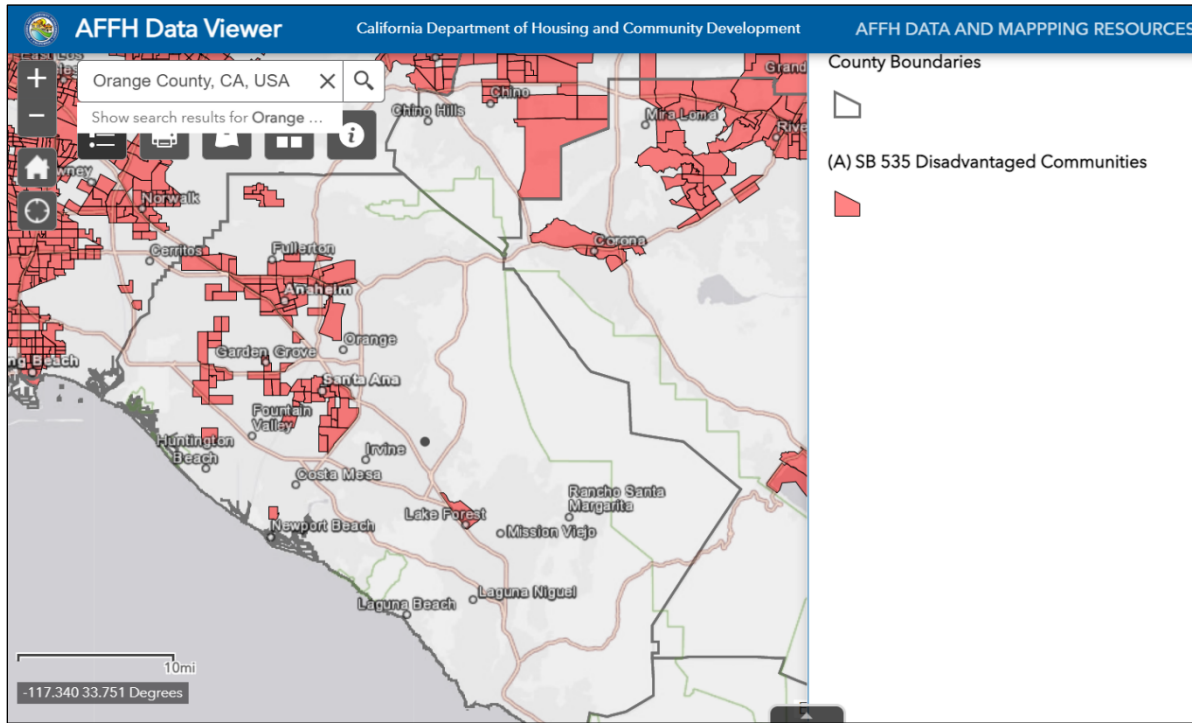


Figure C-20: Disadvantaged Communities – Orange County



E. Disproportionate Housing Needs and Displacement Risk

The AFFH Rule Guidebook (24 C.F.R. § 5.152) defines “disproportionate housing needs” as “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.” The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing. In addition, this analysis examines homelessness and displacement risk.

1) Cost Burden (Overpayment)

A household is considered cost-burdened if it spends more than 30% of its income in housing costs, including utilities. Reducing housing cost burden can also help foster more inclusive communities and increase access to opportunities for persons of color, persons with disabilities, and other protected classes.

Overpayment is a problem for some Villa Park residents, particularly lower-income households. According to recent HUD estimates (Figure C-21) approximately 39 renter households (35% of all renters) and 655 owner households (35% of all owners) were paying more than 30% of income for housing. The highest rates of overpayment occur among very-low-income and extremely-low-income owner households. The impact of housing overpayment on lower-income households is particularly significant for special needs populations – seniors, persons with disabilities, and female-headed households with children.

Figure C-21: Cost Burden by Tenure and Income Category – Villa Park

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI			10
Household Income >30% to less-than or= 50% HAMFI			30
Household Income >50% to less-than or= 80% HAMFI			
Household Income >80% to less-than or= 100% HAMFI	39	4	40
Household Income >100% HAMFI			30
Total	39	4	110
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	80	65	90
Household Income >30% to less-than or= 50% HAMFI	65	35	95
Household Income >50% to less-than or= 80% HAMFI	195	165	265
Household Income >80% to less-than or= 100% HAMFI	25	15	115
Household Income >100% HAMFI	290	55	1,320
Total	655	335	1,885

As shown in [Figure C-22](#), overpayment among renters affects less than 20% of Villa Park households. When compared to conditions in other areas of Orange County (Figure C-23) overpayment among Villa Park renters appears to be lower than most communities.

Figure C-22: Renters Overpaying for Housing – Villa Park

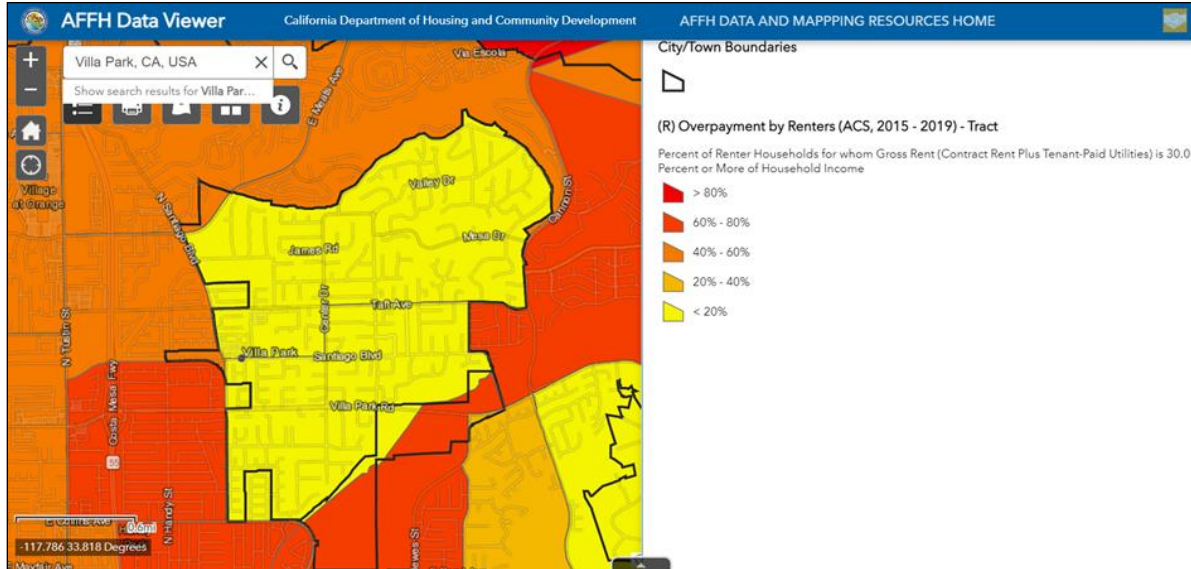
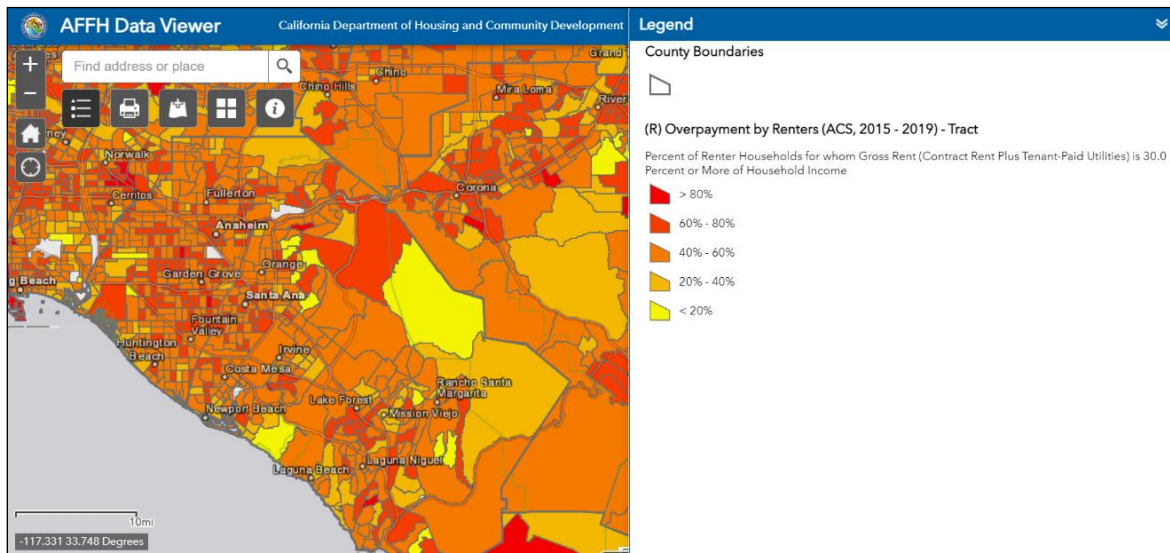


Figure C-23: Renters Overpaying for Housing – Orange County



Overpayment affects 20 to 40% of Villa Park homeowners (Figure C-24), which is similar to or lower than most other areas of Orange County (Figure C-25).

The problems of overpayment are addressed in the Housing Plan through efforts to facilitate production of affordable housing and reduce the cost of housing (see Program 1: Adequate Sites to Accommodate Regional Housing Needs, Program 2: Accessory Dwelling Units, Program 3: Facilitate Housing Development for All Economic Segments of the Community, Program 5: Encourage the Conservation and Maintenance of the City’s Existing Housing Stock, Program 6: Equal Housing Opportunities and Affirmatively Furthering Fair Housing ,and Program 7: Energy Efficiency.

Figure C-24: Homeowners Overpaying for Housing – Villa Park

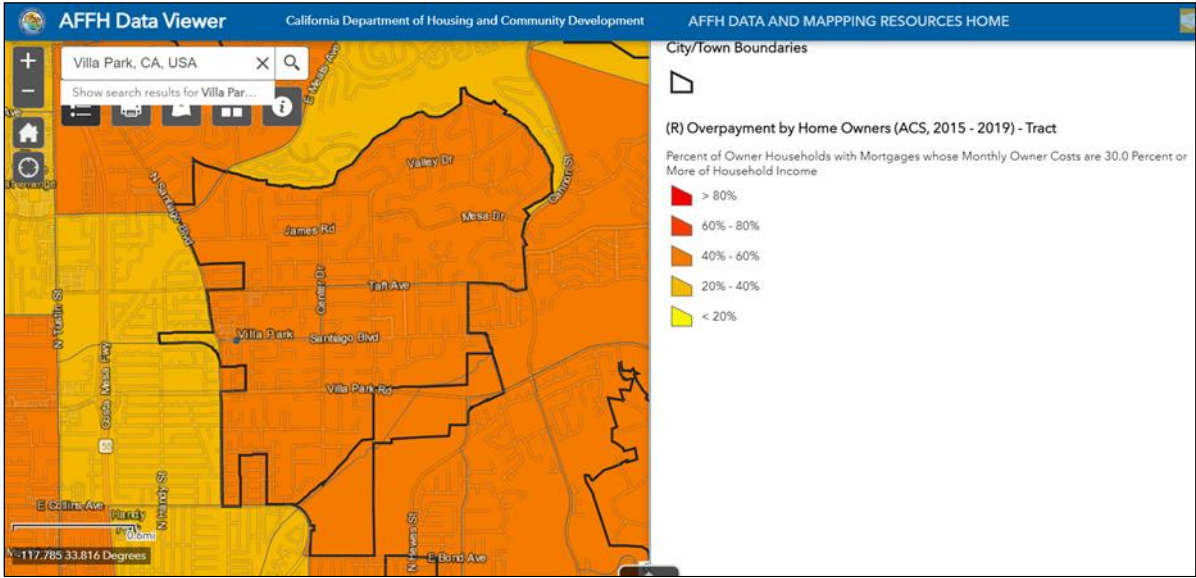
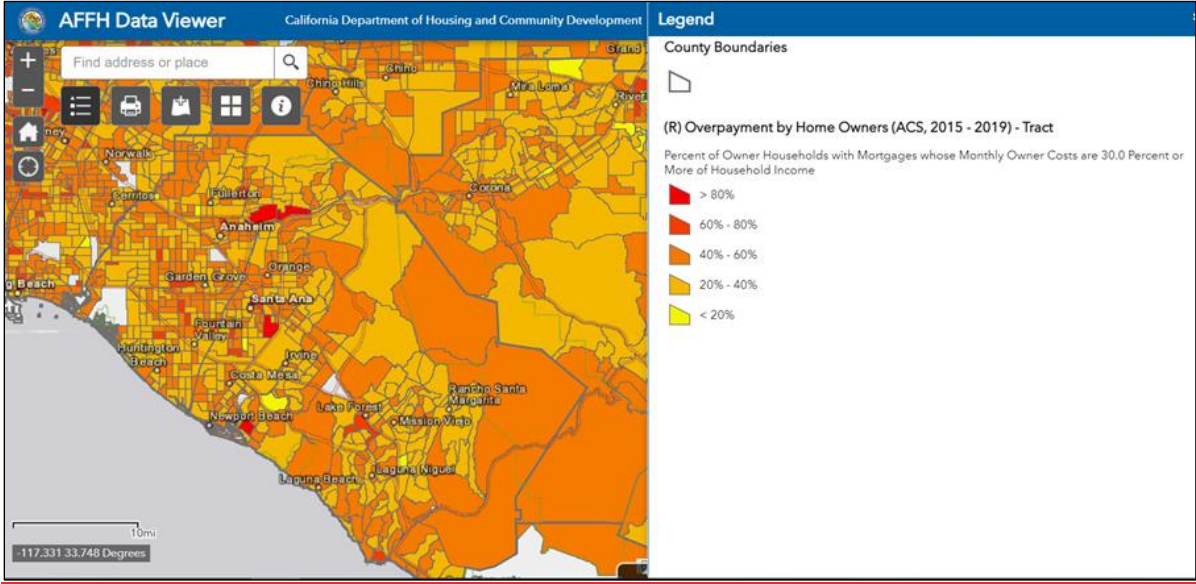


Figure C-25: Homeowners Overpaying for Housing – Orange County



2) Overcrowding

“Overcrowding” is defined as a housing unit occupied by more than 1.01 persons per room (excluding kitchens, porches, and hallways). A unit with more than 1.51 occupants per room is considered “severely overcrowded.” The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding is also related to overpayment, because households may not be able to afford a large enough home to accommodate their needs. Overcrowding can lead to a variety of other problems such as lower educational performance among children, psychological stress and adverse health impacts.

The County AI reported that for Orange County as a whole, White residents experience an overcrowding rate of 1.95%, Black residents 6.52%, Native American residents 11.38%, Asian American or Pacific Islander residents 7.76%, and Hispanic residents 25.72%. Hispanic residents face especially high rates of overcrowding. This is especially true in Anaheim and Santa Ana, where their rates of overcrowding are 29.07% and 42.93%, respectively. Overcrowding in Orange County is illustrated in Figure C-27.

In Villa Park, the rate of overcrowding is less than the statewide average of 8.2% (Figure C-26).

The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production of affordable housing and reduce the cost of housing (see Program 1: Adequate Sites to Accommodate Regional Housing Needs, Program 2: Accessory Dwelling Units, Program 3: Facilitate Housing Development for All Economic Segments of the Community, Program 5: Encourage the Conservation and Maintenance of the City’s Existing Housing Stock, and Program 6: Equal Housing Opportunities and Affirmatively Furthering Fair Housing).

Figure C-26: Overcrowded Households – Villa Park

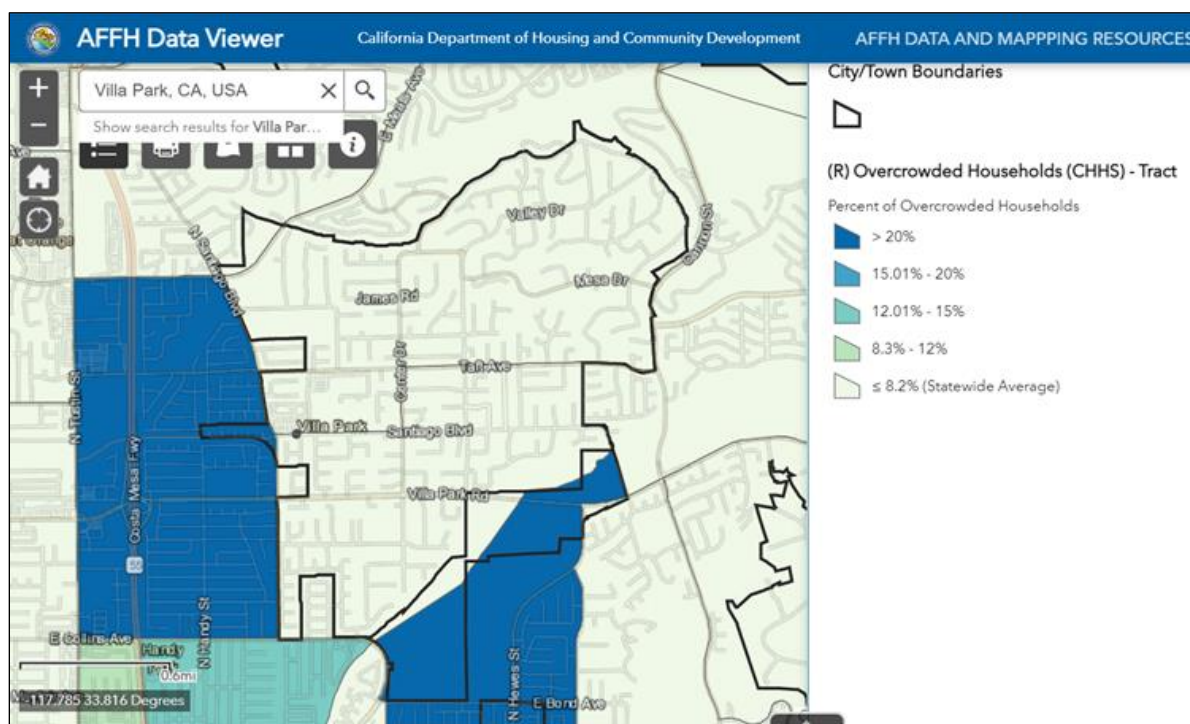
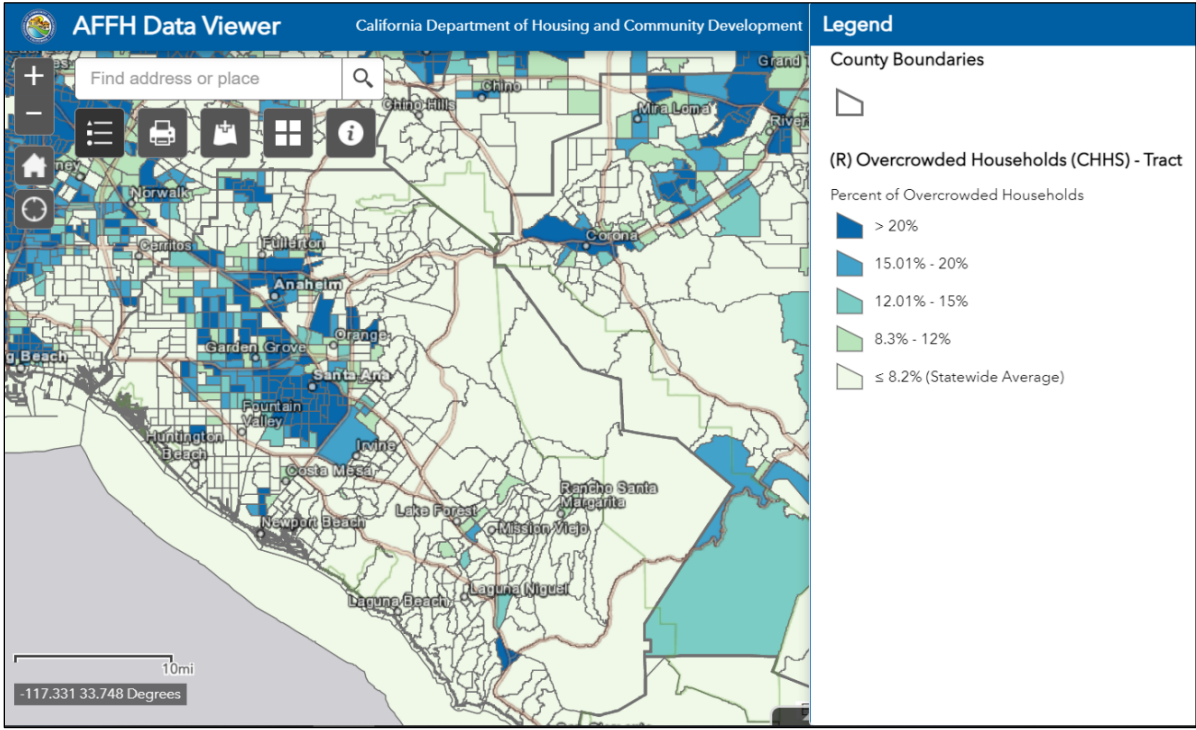


Figure C-27: Overcrowded Households – Orange County



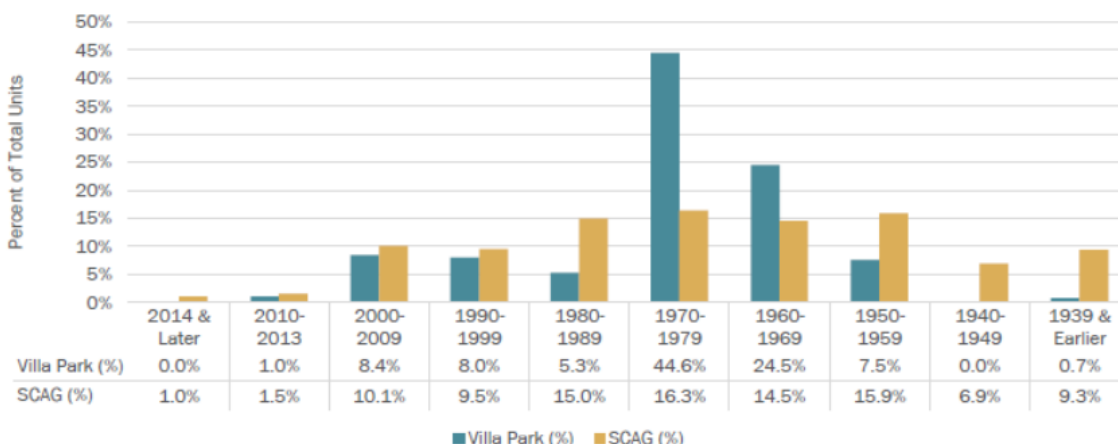
3) Substandard Housing

The age of a housing unit is often an indicator of housing conditions. Housing units without proper maintenance can deteriorate over time. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls or is pulverized by windows and doors opening and closing.

Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs. Additionally, older units may not be built to current building standards for fire and earthquake safety.

The age of housing units in Villa Park compared to the SCAG region as a whole is shown in Figure C-28. Over three-quarters of housing units in Villa Park have been built since 1970. Considering the high home values and community pride in Villa Park, substandard housing conditions are uncommon and it is believed that there are no housing units with substandard conditions that would require the replacement of the housing unit. City staff estimates that about 20 housing units, or approximately 1%, may be in need of some type of rehabilitation. The Housing Plan includes Program 5: Encourage the Conservation and Maintenance of the City’s Existing Housing Stock to facilitate the rehabilitation of those units.

Figure C-28: Age of Housing Units – Villa Park vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

4) Homelessness

The Orange County homeless population includes many working families and individuals who live in cars, parks, under bridges, in motels and in homeless shelters trying to maintain their dignity while they struggle to survive. As a result, most homeless remain hidden. The most recent available Orange County Point-in-Time Count and Survey report of the Homeless (2019) reported no homeless persons in Villa Park.

Regional strategies to combat homelessness are developed through Orange County’s Continuum of Care System. The goal of the Continuum of Care Strategic Plan is to work toward a seamless system of care through advocacy, homeless prevention, outreach and assessment, emergency shelter, transitional shelter and permanent affordable housing.

Persons threatened with homelessness are often those with incomes at 30% of area median income or below who are paying more than 30% of their income for rent.

The nonprofit 2-1-1 Orange County organization is a 24-hours-a-day, 7 days-a-week, toll-free number that people in need of assistance can call to obtain comprehensive information and referrals to health and human services. Available services include food, shelter, government assistance programs, urgent care, substance abuse and treatment programs, and workforce development.

In early 2019 the North Orange County Service Planning Area for Homelessness Outreach Efforts had reached an important milestone. A regional partnership of 13 cities located in northern Orange County (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park, and Yorba Linda) came together to share intelligence and resources to address regional homelessness. Their concept was to promote greater regional coordination on homeless issues while reducing the span of control regarding working with the County of Orange and others.

After months of extensive discussions, negotiations and assessments, two locations within the North Orange County Service Planning Area were identified for the development of “navigation centers” based on a number of factors including zoning, proximity to related services and site

availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to a shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in the city of Anaheim that accommodated 325 new beds.

Funding for the Navigation Centers was secured through application and governmental meetings with state, regional, county and local officials resulting in the \$12 million in State of California Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of the navigation centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing operation of the navigation centers. A Memorandum of Understanding was prepared and presented to the city councils of all 13 cities in May 2019. Construction began in 2019 and the opening of the first 100-bed Navigation Center in Placentia occurred on March 31, 2020. This groundbreaking success story was born of the regional need and public official desire to come together to address homelessness and pioneer the way to create and operate a multi-jurisdictional homelessness facility.

5) Displacement Risk

In 2016, the Urban Displacement Project¹² team developed a neighborhood change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The database includes Los Angeles, Orange, and San Diego counties, with gentrification and sociodemographic indicators based on data from the Census Bureau American Community Survey and shows whether each Census tract gentrified between 1990 and 2000; gentrified between 2000 and 2015; gentrified during both of these periods; or exhibited characteristics of a “disadvantaged” tract that did not gentrify between 1990 and 2015.

Based on this neighborhood change database, the team found that the areas most susceptible to displacement in Orange County are portions of Buena Park, Fullerton, Anaheim and Garden Grove. The eastern, south and coastal communities are primarily exclusive or at risk of becoming exclusive. Figure C-29 shows the displacement vulnerability levels for Orange County while Figure C-30 shows that small areas in the western and southern portions of Villa Park are considered vulnerable to displacement.

¹² <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/>

Figure C-29: Displacement Vulnerability – Orange County

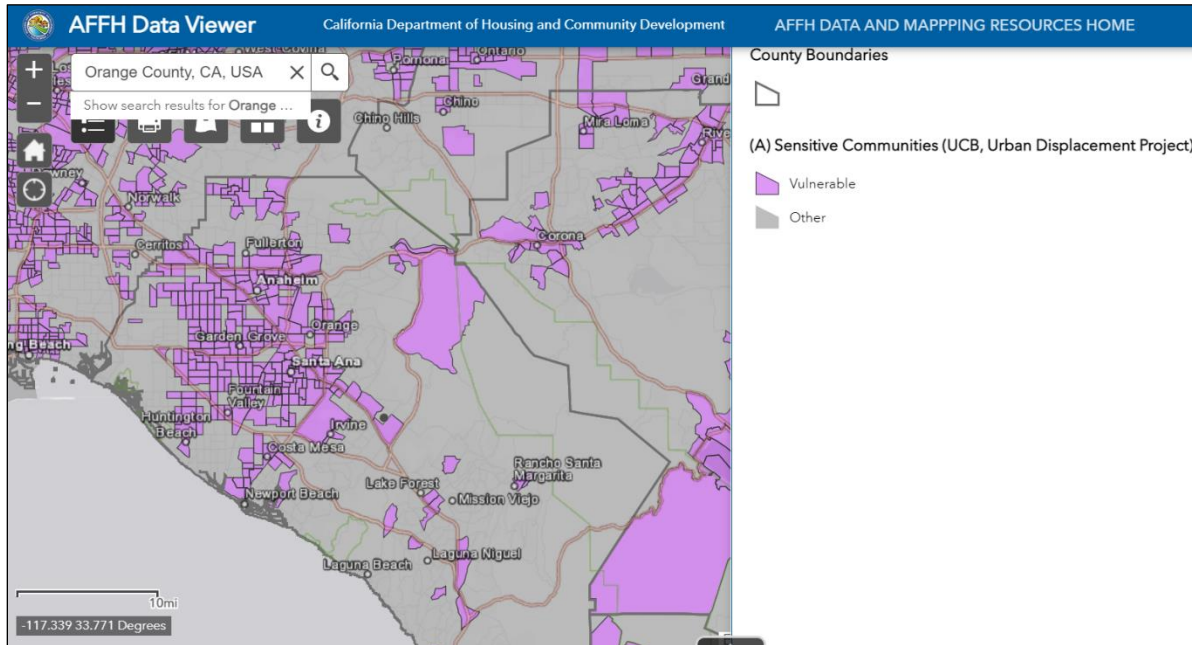
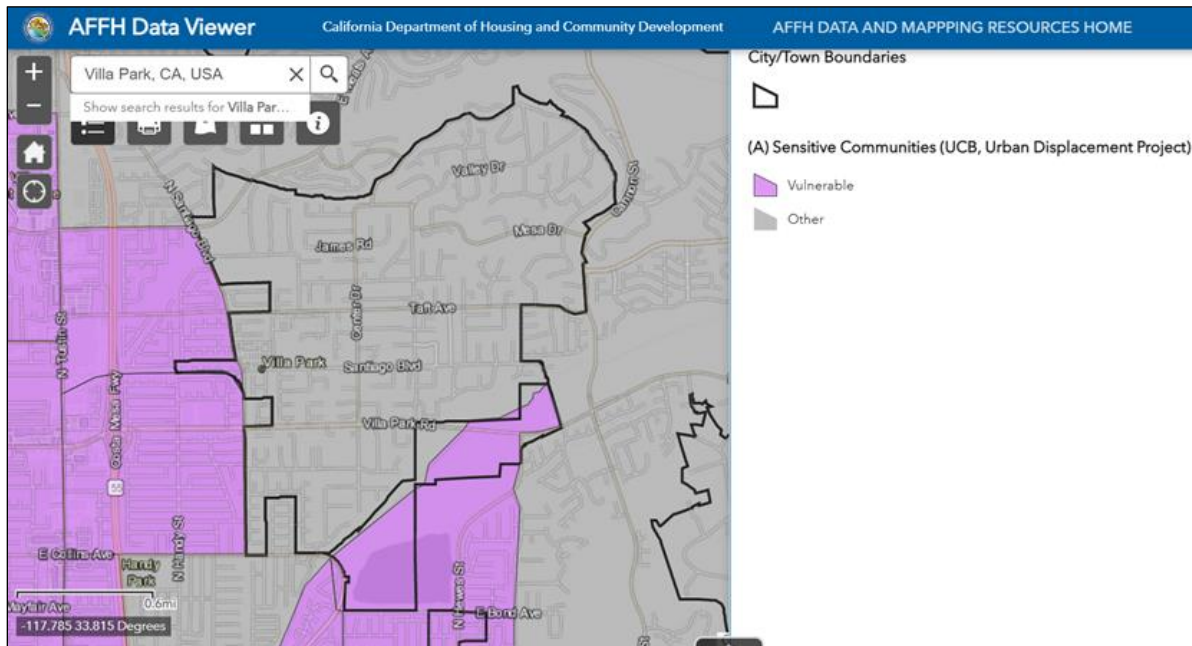


Figure C-30: Displacement Vulnerability – Villa Park



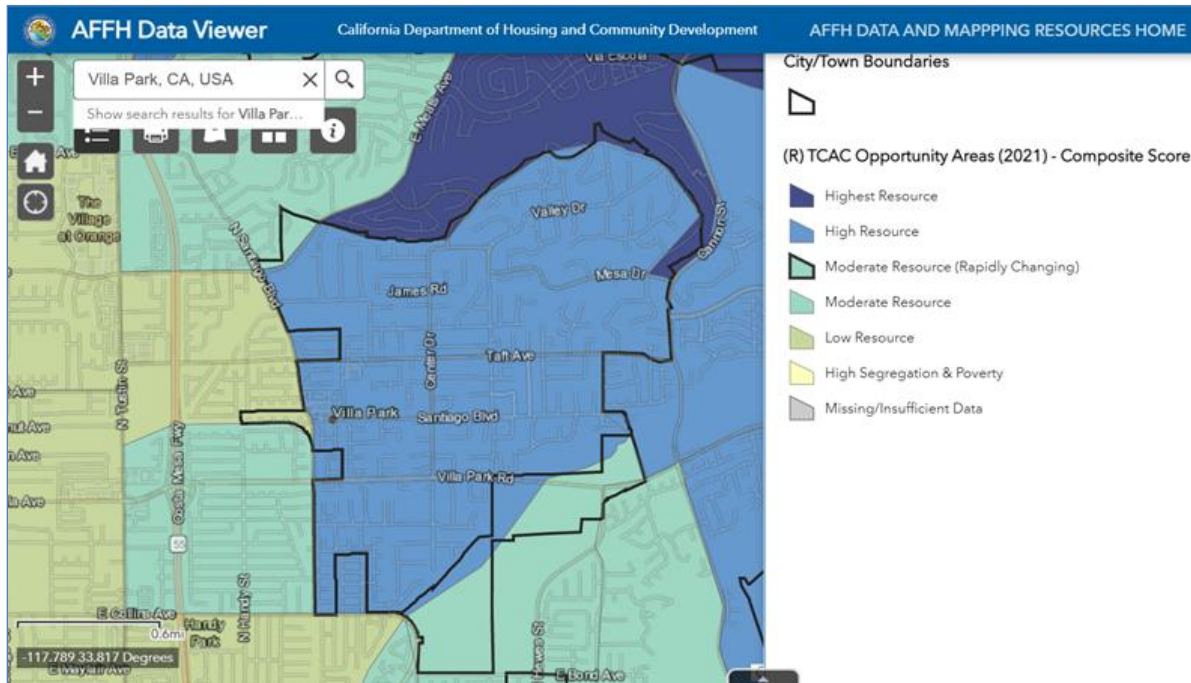
There are no assisted low-income housing developments in Villa Park at risk of conversion to market rate in the next 10 years.

3. Sites Inventory Analysis

The City’s inventory of sites for potential housing is presented in Chapter III: Resources and Opportunities. The inventory is comprised of vacant sites, non-vacant underutilized sites and future ADUs.

As illustrated in Figure C-31, all of the potential housing sites are within areas designated by the TCAC/HCD opportunity maps as High or Moderate Resource.

Figure C-31: TCAC Opportunity Areas Composite Score – Villa Park



In addition to the vacant and underutilized sites listed in Chapter III, existing residential neighborhoods also provide substantial opportunities for new housing in areas of high opportunity through ADUs and SB 9 urban lot splits.

4. Contributing Factors

The Housing Element must include an identification and prioritization of significant contributing factors to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs. “Fair housing contributing factor” means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all the prior efforts and analyses: outreach, assessment of fair housing, and site inventory. Contributing factors must also be prioritized in terms of needed impact on fair housing choice and strongly connect to goals and actions.

Through the participation of stakeholders, fair housing advocates, and the assessment of fair housing issues described in this appendix, the City has identified fair housing issues and contributing factors as well as meaningful actions to address those issues as described in **Error! Reference source not found.** Fair Housing Issues, Contributing Factors and Meaningful Actions.

5. Goals, Policies and Actions

Based upon the analysis presented above, the City has identified fair housing issues, contributing factors, and meaningful actions that will be taken to address those issues during the planning period. The 2020-2024 Orange County Analysis of Impediments to Fair Housing Choice prepared by the Urban County consortium, of which Villa Park is a participating jurisdiction, was of key importance in helping to identify these issues, contributing factors and actions.

Table C-2: Fair Housing Issues, Contributing Factors and Meaningful Actions

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
<p>Fair Housing Outreach</p>	<p>1. Lack of local private fair housing outreach and enforcement may be a significant contributing factor to fair housing issues in Orange County. Although Orange County is served by two high-quality private, non-profit fair housing organizations, they are underfunded and understaffed in comparison to the total need for their services. Victims of discrimination would be more able to exercise their rights, thus deterring future discrimination, if the capacity of existing organizations grew to meet the scale of the problem.</p> <p>2. Lack of local public fair housing outreach and enforcement may also be a significant contributing factor to fair housing issues in Orange County. There are no local public entities that conduct fair housing outreach and enforcement, with the California Department of Fair Employment and Housing and HUD constituting the only public enforcement bodies that operate in Orange County. Advocates across Orange County and the state of California have reported issues with the timeline of the California Department of Fair Employment and Housing’s investigations and the standards that it applies in making probable cause determinations. A local public enforcement agency, if created, would have the potential to be more responsive to victims of discrimination in Orange County than either the state or HUD.</p>	<p>High</p>	<p>The City will continue to disseminate information regarding fair housing in a variety of locations including City Hall, the City website and the library, and conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.</p> <p>The City will continue to seek funding to support the Fair Housing Council of Orange County (FHCO), which provides community education, individual counseling, mediation, and low-cost advocacy with the expressed goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire.</p> <p>The City will invite FHCO to conduct annual fair housing outreach targeted to Villa Park residents and landlords.</p>
<p>Access to Opportunity</p>	<p>Lack of access to opportunity due to high housing costs may be a significant contributing factor to fair housing issues in Orange County. Increasing housing affordability would make it easier for low-income households to access the types of services and amenities that further social mobility.</p>	<p>High</p>	<p>The City will seek to improve access to opportunity for lower-income households and other protected classes by providing adequate sites for affordable housing development, encouraging the production of ADUs, and facilitating the production of housing for persons with special needs.</p>

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Appendix D Glossary

Above Moderate-Income Household. A household with an annual income greater than 120% of the Area Median Income (AMI) adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

ACS. American Community Survey

ADU. Accessory dwelling unit

AMI. Areawide Median Income

Apartment. An apartment is one or more rooms in an apartment house or dwelling occupied or intended or designated for occupancy by one family for sleeping or living purposes and containing one kitchen.

Assisted Housing. Generally multi-family rental housing, but sometimes single-family ownership units, whose construction, financing, sales prices, or rents have been subsidized by federal, state, or local housing programs.

Below-market-rate (BMR). Any housing unit specifically priced to be sold or rented to Low- or Moderate-Income households for an amount less than the fair-market value of the unit. Both the State of California and the U.S. Department of Housing and Urban Development set standards for determining which households qualify as “Low-Income” or “Moderate-Income.” May also refer to the financing of housing at less than prevailing interest rates.

Build-out. That level of urban development characterized by full occupancy of all developable sites in accordance with the General Plan; the maximum level of development envisioned by the General Plan.

Community Development Block Grant (CDBG). A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitlement communities and by counties or the California Department of Housing and Community Development (HCD) for non-entitled jurisdictions. This grant allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.

Condominium. A type of ownership in which the interior space is individually owned and the balance of the property (both land and building) is owned in common by the owners of the individual units. (See “Townhouse.”)

Covenants, Conditions, and Restrictions (CC&Rs). A term used to describe private restrictive limitations that may be placed on property and its use, and which usually are made a condition of holding title or lease.

DDS. California Department of Developmental Services

Density Bonus. The allocation of development rights that allow a parcel to accommodate additional square footage or residential units beyond the maximum for which the parcel is zoned, usually in exchange for the provision of affordable housing at the same site or at another location.

Density, Residential. The number of residential dwelling units per acre of land. Densities specified in the General Plan may be expressed in units per gross acre or per net developable acre.

Developable Land. Land that is suitable as a location for structures.

DOF. California Department of Finance

Down Payment. Money paid by a buyer from his own funds, as opposed to that portion of the purchase price that is financed.

Duplex. A detached building under single ownership that is designed for occupation as the residence of two families living independently of each other.

Dwelling Unit (du). A building or portion of a building containing one or more rooms, designed for or used by one family for living or sleeping purposes, and having a separate bathroom and only one kitchen or kitchenette. See Housing Unit.

Elderly Housing. Typically small apartments or condominiums designed to meet the needs of persons 62 years of age and older or, if more than 150 units, persons 55 years of age and older, and restricted to occupancy by them.

Emergency Shelter. Temporary housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay. [*California Health and Safety Code §50801(e)*]

Extremely-Low-Income Household. A household with an annual income equal to or less than 30% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

Fair Market Rent. The rent, including utility allowances, determined by the United States Department of Housing and Urban Development (HUD) for purposes of administering the Section 8 Program.

Family. (1) Two or more persons related by birth, marriage, or adoption [U.S. Bureau of the Census]. (2) An individual or a group of persons living together who constitute a bona fide single housekeeping unit in a dwelling unit, not including a fraternity, sorority, club, or other group of persons occupying a hotel, lodging house or institution of any kind.

FEMA. Federal Emergency Management Agency

General Plan. A comprehensive, long-term plan mandated by State Planning Law for the physical development of a city or county and any land outside its boundaries which, in its judgment, bears relation to its planning. The plan shall include seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. The plan must include a statement of development policies and a diagram or diagrams illustrating the policies.

Goal. A general, overall, and ultimate purpose, aim, or end toward which the City will direct effort.

Green Building. Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition. (US Environmental Protection Agency)

HAMFI. HUD Area Median Family Income

Historic Preservation. The preservation of historically significant structures and neighborhoods until such time as, and in order to facilitate, restoration and rehabilitation of the building(s) to a former condition.

Historic Property. A historic property is a structure or site that has significant historic, architectural, or cultural value.

HOA. Homeowners association

Household. All those persons—related or unrelated—who occupy a single housing unit. (See “Family.”)

Housing and Community Development Department (HCD). The state agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of Low-and Moderate-Income households.

Housing Element. One of the seven state-mandated elements of a local general plan. It assesses the existing and projected housing needs of all economic segments of the community, identifies potential sites adequate to provide the amount and kind of housing needed, and contains adopted goals, policies, and implementation programs for the preservation, improvement, and development of housing.

Housing Payment. For ownership housing, this is defined as the mortgage payment, property taxes, insurance and utilities. For rental housing this is defined as rent and utilities.

Housing Unit. The place of permanent or customary abode of a person or family. A housing unit may be a single-family dwelling, a multi-family dwelling, a condominium, a modular home, a mobile home, a cooperative, or any other residential unit considered real property under state law.

Housing and Urban Development, U.S. Department of (HUD). A cabinet-level department of the Federal government that administers housing and community development programs.

Implementing Policies. The City’s statements of its commitments to consistent actions.

Implementation. Actions, procedures, programs, or techniques that carry out policies.

Infill Development. The development of new housing or other buildings on scattered vacant lots in a built-up area or on new building parcels created by permitted lot splits.

JADU. Junior accessory dwelling unit

Jobs-Housing Balance. The existing or projected ratio of employment to housing units within a geographic area.

Land Use Classification. A system for classifying and designating the allowable use of properties.

Large family. A family with 5 or more persons

Live-Work Units. Buildings or spaces within buildings that are used jointly for commercial and residential purposes where the residential use of the space is secondary or accessory to the primary use as a place of work.

Low-Income Household. A household with an annual income usually no greater than 51%-80% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

Low-Income Housing Tax Credits. Tax reductions provided by the Federal and state governments for investors in low-income housing.

Manufactured Housing. Residential structures that are constructed entirely in the factory, and which since June 15, 1976, have been regulated by the Federal Manufactured Home

Construction and Safety Standards Act of 1974 under the administration of the U. S. Department of Housing and Urban Development (HUD). (See “Mobile Home” and “Modular Unit.”)

Mixed-use. Properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design. A “single site” may include contiguous properties.

Moderate-Income Household. A household with an annual income usually no greater than 81%-120% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

Monthly Housing Expense. Total principal, interest, taxes, and insurance paid by the borrower, or total rent and utilities paid by a tenant on a monthly basis. Used with gross income to determine affordability.

Multiple Family Building. A building designed and used exclusively as a dwelling by two or more households occupying separate suites.

NAICS. North American Industry Classification System

NFIP. National Flood Insurance Program

Ordinance. A law or regulation set forth and adopted by a governmental authority, usually a city or county.

Overcrowded Housing Unit. A housing unit in which the members of the household or group are prevented from the enjoyment of privacy because of small room size and housing size. The U.S. Bureau of Census defines an overcrowded housing unit as one that is occupied by more than one person per room.

Parcel. A lot or tract of land.

PC. Planned community

Persons with Disabilities. Persons determined to have a physical impairment or mental disorder expected to be of long or indefinite duration. Many such impairments or disorders are of such a nature that a person’s ability to live independently can be improved by appropriate housing conditions.

Planning Area. The area directly addressed by the general plan. A city’s planning area typically encompasses the city limits and potentially annexable land within its sphere of influence.

Policy. A specific statement of principle or of guiding actions that implies clear commitment but is not mandatory. A general direction that a governmental agency sets to follow, in order to meet its objectives before undertaking an action program.

Poverty Level. As used by the U.S. Census, families and unrelated individuals are classified as being above or below the poverty level based on a poverty index that provides a range of income cutoffs or “poverty thresholds” varying by size of family, number of children, and age of householder. The income cutoffs are updated each year to reflect the change in the Consumer Price Index.

Program. An action, activity, or strategy carried out in response to adopted policy to achieve a specific goal or objective. Policies and programs establish the “who,” “how” and “when” for carrying out the “what” and “where” of goals and objectives.

RCoC. Regional Center of Orange County

Redevelop. To demolish existing buildings; or to increase the overall floor area existing on a property; or both; irrespective of whether a change occurs in land use.

Regional. Pertaining to activities or economies at a scale greater than that of a single jurisdiction, and affecting a broad geographic area.

Regional Housing Needs Assessment. A quantification of existing and projected housing need, by household income group, for localities within a region.

Rehabilitation. The repair, preservation, and/or improvement of substandard housing.

Residential. Land designated in the General Plan and zoning ordinance for building consisting of dwelling units. May be improved, vacant, or unimproved. (See “Dwelling Unit.”)

Residential Care Facility. A facility that provides 24-hour care and supervision to its residents.

Residential, Multiple Family. Two or more dwelling units on a single site, under common ownership.

Residential, Single-Family. A single dwelling unit on a building site.

Retrofit. To add materials and/or devices to an existing building or system to improve its operation, safety, or efficiency. Buildings have been retrofitted to use solar energy and to strengthen their ability to withstand earthquakes, for example.

Rezoning. An amendment to the map to effect a change in the nature, density, or intensity of uses allowed in a zoning district and/or on a designated parcel or land area.

Second Unit. A self-contained living unit, either attached to or detached from, and in addition to, the primary residential unit on a single lot. “Granny Flat” is one type of second unit.

Section 8 Rental Assistance Program. A Federal (HUD) rent-subsidy program that is one of the main sources of Federal housing assistance for low-income households. The program operates by providing housing assistance payments to owners, developers, and public housing agencies to make up the difference between the “Fair Market Rent” of a unit (set by HUD) and the household’s contribution toward the rent, which is calculated at 30% of the household’s adjusted gross monthly income (GMI).

Shared Living. The occupancy of a dwelling unit by persons of more than one family in order to reduce housing expenses and provide social contact, mutual support, and assistance. Shared living facilities serving six or fewer persons are permitted in all residential districts by §1566.3 of the California Health and Safety Code.

Single-family Dwelling, Attached. A dwelling unit occupied or intended for occupancy by only one household that is structurally connected with at least one other such dwelling unit. (See “Townhouse.”)

Single-family Dwelling, Detached. A dwelling unit occupied or intended for occupancy by only one household that is structurally independent from any other such dwelling unit or structure intended for residential or other use. (See “Family.”)

Single Room Occupancy (SRO). A single room, typically 80 to 250 square feet, with a sink and closet, but which may require the occupant to share a communal bathroom, shower, and kitchen.

SOC. Standard Occupational Classification

Subsidize. To assist by payment of a sum of money or by the granting to terms or favors that reduces the need for monetary expenditures. Housing subsidies may take the form of mortgage interest deductions or tax credits from Federal and/or state income taxes, sale or lease at less

than market value of land to be used for the construction of housing, payments to supplement a minimum affordable rent, and the like.

Substandard Housing. Residential dwellings that, because of their physical condition, do not provide safe and sanitary housing.

Supportive Housing. Housing with no limit on length of stay, that is occupied by the target population as defined in *California Health and Safety Code* §3260(d), and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. "Target population" means adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people. [*California Health and Safety Code* §50675.14(b) and §53260(d)]

Target Areas. Specifically designated sections of the community where loans and grants are made to bring about a specific outcome, such as the rehabilitation of housing affordable by very-low- and low-income households.

Tenure. A housing unit is "owned" if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. All other occupied units are classified as "rented," including units rented for cash rent and those occupied without payment of cash rent.

Townhouse. A townhouse is a dwelling unit located in a group of three (3) or more attached dwelling units with no dwelling unit located above or below another and with each dwelling unit having its own exterior entrance.

Transitional Housing. Shelter provide to the homeless for an extend period, often as long as 18 months, and generally integrated with other social services and counseling programs to assist in the transition to self-sufficiency through the acquisition of a stable income and permanent housing. (See "Emergency Shelter") Buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. [*California Health and Safety Code* §50675.2(h)]

Very-Low-Income Household. A household with an annual income usually no greater than 50% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.