October 11, 2021

Megan Kirkeby, Deputy Director
Division of Housing Policy Development
Department of Housing and Community Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

RE: City of La Palma Adopted 6th Cycle Housing Element Submittal

Dear Ms. Kirkeby:

Enclosed for your review is the City of La Palma's Housing Element for the 6th planning cycle, which was adopted by the City Council at a public hearing on October 5, 2021. The element has been revised to address the comments in your review letter of August 20, 2021. A summary of revisions made to the draft element is provided in Exhibit A of the attached City Council resolution.

The City appreciates the assistance provided by Chelsea Lee during the preparation of the element. If you have any questions please contact Planning Manager Scott Hutter at shutter@cityoflapalma.org or (714) 690-3336, or our consultant John Douglas at John@JHDPlanning.net or 714-803-2860.

Sincerely,

Conal McNamara
City Manager

Enclosure: Adopted La Palma 2021-2029 Housing Element
City Council Resolution

www.cityoflapalma.org
7822 Walker Street
La Palma, CA 90623-1771
PHONE 714 690 3300
FAX 714 523 2141

RESOLUTION NO. 2021-31

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LA PALMA, CALIFORNIA, ADOPTING THE LA PALMA 2021-2029 HOUSING ELEMENT

WHEREAS, The State of California requires every municipality to periodically update the Housing Element of its General Plan to review the housing needs of the community and revise its policies, programs, and objectives to address those needs; and,

WHEREAS, Jurisdictions such as the City of La Palma that are within the Southern California Association of Governments (SCAG) region are required to update their Housing Elements for the 6th housing cycle, which covers the 2021-2029 planning period; and,

WHEREAS, On June 21, 2021, the Draft La Palma 2021-2029 Housing Element was submitted to the California Department of Housing and Community Development ("HCD ") for review pursuant to Section 65585(b) of the California Government Code; and,

WHEREAS, on August 20, 2021 HCD issued its review of the Draft La Palma 2021-2029 Housing Element, which stated that the Draft Housing Element addresses many statutory requirements; however, revisions would be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code); and,

WHEREAS, the City has reviewed HCD's comments and prepared a revised 2021-2029 Housing Element to address HCD's comments, as described in "**EXHIBIT A**" to this Resolution; and,

WHEREAS, the La Palma 2021 -2029 Housing Element does not propose any changes to land uses or densities/intensities that have already been evaluated in the 2014 General Plan Program Environmental Impact Report (GP PEIR); therefore, the Housing Element is within the scope of the GP PEIR pursuant to Guidelines Sec. 15168(c)(2) and no additional environmental analysis is required; and,

WHEREAS, notice of the October 5, 2021 City Council Public Hearing was published in a local newspaper at least ten (10) days prior to the hearing and posted at La Palma City Hall, La Palma Central Park, and the La Palma Library.

NOW, THEREFORE, the City Council of the City of La Palma resolves as follows:

SECTION 1. The foregoing recitals are true and are incorporated herein and made a part hereof.

SECTION 2. Notice of the City Council Public Hearing was published in a newspaper of general circulation on September 22, 2021, a minimum of ten (10) days in advance of the hearing in compliance with California Government Code Section 65090.

SECTION 3. The City Council finds and determines that since the Housing Element does not propose any changes to land uses or densities/intensities already evaluated in the General Plan Program Environmental Impact Report (GP PEIR), that the Housing Element is within the scope of the GP PEIR pursuant to Guidelines Sec. 15168(c)(2) and no additional environmental analysis is required.

SECTION 4. The City Council finds that the La Palma 2021 - 2029 Housing Element has been revised to fully address HCD comments, and complies with statutory requirements relating to the Housing Element as set forth in Government Code Section 65580 et seq. The City Council further finds that the Housing Element is consistent with the other elements of the City's General Plan.

SECTION 5. The City Council hereby adopts the La Palma 2021 - 2029 Housing Element as attached hereto and incorporated herein as "**EXHIBIT B**" to this Resolution. The City Manager is directed to submit the adopted La Palma 2021-2029 Housing Element to HCD for review pursuant to Government Code Sec. 65585(g). The City Manager is further directed to make any technical or clerical revisions to the Housing Element as may be necessary to obtain a finding of substantial compliance from HCD.

APPROVED AND ADOPTED by the City Council of La Palma at a regular meeting on the 5th day of October 2021.

Nitesh P. Patel
Mayor

ATTEST:

Kimberly Kenney, CMC
City Clerk

STATE OF CALIFORNIA)
COUNTY OF ORANGE) SS
CITY OF LA PALMA)

I, KIMBERLY KENNEY, City Clerk of the City of La Palma, California, DO HEREBY CERTIFY that the foregoing Resolution was adopted by the City Council of said City at a regular meeting of said City Council held on the 5th day of October 2021, and that it was so adopted by called vote as follows:

AYES: Baker, Goodman, Patel, Steggell, and Waldman

NOES: None

Kimberly Kenney, CMC
City Clerk

Exhibit A

HCD 6th Housing Element Comments and Responses
City of La Palma

HCD Comment (Letter of 8/20/2021)	Revised Draft Housing Element Page No.	Response/Revision
A. Review and Revise	C-53 to 55	Appendix A has been revised to provide an explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations.
B.1 Affirmatively Furthering Fair Housing	C-27 4-11	The element has been revised to include a description of public outreach, an assessment of fair housing, identification and prioritization of contributing factors to fair housing issues. In addition, Program 11 describes actions the City will take to affirmatively further fair housing.
B.2 Extremely-Low-Income Needs	C-9	Existing needs of extremely low-income (ELI) households are described in Table C-9 and City programs to address these needs are noted.
B.3 Housing Conditions	C-21	The analysis of housing conditions has been expanded to include an estimate of the number of units in need of rehabilitation and replacement.
B.4 Land Inventory to Accommodate the RHNA	C-44 to 47 City Council Resolution	Parcel listing. The element has been revised to include additional analysis of the existing uses on each site, including floor area ratio (FAR) and the relationship between existing development and potential development on each site. Realistic capacity. The analysis of site capacity has been expanded to provide additional information. The Mixed Use General Plan designation allows a density of 27 to 48 units/acre and site capacity in Table C-34 has been estimated as the low end of the allowable density range (27 du/ac). Suitability of Nonvacant Sites. The element has been expanded to include additional analysis of potential for redevelopment. In addition, the City Council resolution adopting the Housing Element includes findings based on substantial evidence that the existing use is likely to be discontinued during

HCD Comment (Letter of 8/20/2021)	Revised Draft Housing Element Page No.	Response/Revision
		the planning period pursuant to Government Code Sec. 65583.2(g)(2).
B.4 Land Inventory to Accommodate the RHNA	C-46/47 C-25 4-13	Small sites. Of the 41 parcels listed in the inventory (Table C-34), only 5 are smaller than ½ acre and the total estimated capacity of those small sites is 27 units, or about 1% of total estimated capacity. All of the sites smaller than ½ acre are adjacent to parcels that enable lot consolidation into larger sites. Zoning for Lower-Income Households. As noted in Table C-34, all of the sites identified to accommodate the lower-income RHNA allocation allow a density greater than 20 units/acre; therefore, no analysis is required. Infrastructure. Additional analysis of water, sewer and dry utility capacity to accommodate the City's RHNA allocation has been provided, which indicates that projected infrastructure capacity is sufficient to accommodate the RHNA. In addition, Program 13 has been revised to include transmittal of the Housing Element to water and sewer providers with information regarding the RHNA allocation and State requirements for priority water and sewer service to developments with lower-income units pursuant to Government Code §65589.7. Electronic sites inventory. The sites inventory has been revised to utilize HCD's standards, forms, and definitions and an electronic inventory will be submitted with the adopted element.
B.4 Land Inventory to Accommodate the RHNA	4-9 to 11 C-40 to 42	Zoning for a variety of housing types. *Emergency shelters*. The Housing Element has been revised to clarify that the review process is non-discretionary and additional analysis has been provided regarding City regulations for emergency shelters, including capacity and potential in the zone sufficient to accommodate the unmet need for emergency shelters and at least one shelter. The expanded analysis also addresses available acreage or potential reuse of structures, proximity to services and transit, presence of hazards, and development standards including bed limits and parking requirements. Program 8 has also been revised to include an update to emergency shelter parking standards

HCD Comment (Letter of 8/20/2021)	Revised Draft Housing Element Page No.	Response/Revision
		consistent with AB 139. *Employee Housing*: The element has been revised to address the requirements of the Employee Housing Act, specifically sections 17021.5 and 17021.6 regarding employee housing. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. Program 8 has also been expanded to address this issue. *ADU standards*. Program 10 includes a commitment to review current regulations and amend as necessary to ensure conformance with State law.
B.5 Governmental Constraints	C-38 4-13	Land use controls. The element includes analysis of land use controls as potential constraints on a variety of housing types. Processing and permit procedures. The element has been revised to expand the analysis of the impact of Precise Plan findings and procedures on the cost and supply of housing, and Program 13 has been revised to address this issue.
B.5 Governmental Constraints	C-39 4-13	Housing for persons with disabilities • Group homes for 7+ persons. The element has been revised to include additional analysis of regulations for large group homes. • Zoning, Development Standards and Fees. The element has been revised to clarify the City's compliance with new transparency requirements for posting all zoning, development standards and fees on the City website. In addition, Program 13 has been expanded to address this issue.

HCD Comment (Letter of 8/20/2021)	Revised Draft Housing Element Page No.	Response/Revision
		• SB 35 Streamlined Ministerial Approval Process. Program 13 has been revised to include preparation of written procedures for the SB 35 Streamlined Ministerial Approval Process.
B.6 Non-Governmental Constraints	C-24	The element has been revised to provide additional analysis of land, construction and financing costs, and evaluate local efforts to address nongovernmental constraints that create a gap in the jurisdiction's ability to meet RHNA.
B.7 Special Housing Needs	C-40 4-9/10	Farmworkers. The analysis of farmworker housing needs has been expanded to include the housing needs of farmworkers at the regional level and Program 8 has been revised to address this issue.
C. Housing Programs	4-5 through 13	1. Program timelines. Programs 1 (Section 8 Rental Assistance), 2 (Preservation and Rehabilitation), 7 (Home Spotlight Award Program) and 13 (Facilitate Development to Accommodate Regional Housing Needs) have been revised to include discrete timelines. In addition, Program 10 has been revised to include ADU regulations. 2. Sites inventory. As discussed above, additional analysis has been provided regarding the sites inventory. In addition, Program 8 (Emergency, Transitional and Supportive Housing) has been revised to address this comment. 3. Programs to assist in the development of housing for extremely low-income households and individuals and households with special needs. Program 13 has been expanded to encourage development of housing to meet the needs of lower- and moderate-income households, including extremely-low-income households and persons with special needs. 4. Programs to remove constraints. This comment is addressed in the issues discussed above.

HCD Comment (Letter of 8/20/2021)	Revised Draft Housing Element Page No.	Response/Revision
C. Housing Programs	C-26 to 31 4-13	5. Affirmatively Furthering Fair Housing. The element has been revised to include additional analysis of fair housing. 6. ADUs. Program 13 has been expanded to include incentives to promote development of ADUs.
D. Quantified Objectives	4-14	The element has been revised to include conservation and rehabilitation objectives by income group, including extremely low-income households.
E. Public Participation	C-4	The element has been revised to describe additional opportunities for public review the City provided to encourage participation of all economic segments of the community and persons with special needs during the Housing Element review and adoption process. It should be recognized that La Palma is the 3rd smallest city in Orange County (population 15,442 in 2021) and housing organizations typically do not engage in La Palma's planning process. Only one communication was received from housing organizations (The Kennedy Commission in August 2020) during the course of the Housing Element update even though the City sent several notices to housing organizations inviting participation.

EXHIBIT B

CITY OF LA PALMA
GENERAL PLAN

Chapter 4:
Housing Element

1. Introduction
2. Housing Plan
3. Housing Program and Action Plan

Housing Element

Introduction

This chapter focuses on the policy aspect of housing. Appendix C: Housing Element Technical Appendix contains the data and analysis that shape and inform the policy commitments. Combined, this chapter and Appendix C cover the scope required by the California Government Code for Housing Elements in local General Plans.

Nearly half of our City is zoned for residential use, and La Palma's foundation was as a bedroom community. The first city plan provided for housing of all types to accommodate diverse needs and preferences. Quality housing and quality neighborhoods define La Palma. Thus, continuing to plan for housing—from maintenance to meeting the evolving needs of residents—is very important to our community. In this Housing Element, we identify and establish our goals, policies, and programs for meeting the housing needs of our existing and future residents. We also outline an action plan that will guide the implementation of our housing goals. In implementing this plan, we seek to contribute to the statewide housing goal of "early attainment of decent housing and a suitable living environment for every California family," as well as to respond to housing conditions and needs unique to the City of La Palma.

For this document to play a meaningful role in guiding our actions, we must periodically evaluate its effectiveness. Our Regional Housing Needs Assessment (RHNA) was updated by the Southern California Association of Governments in 2021, and this Housing Element covers the planning period from October 15, 2021 through October 15, 2029.

Our Housing Plan identifies specific actions we will take to implement the goals and policies of this Housing Element. Pursuant to state law (Government Code §65583), our plan must accomplish the following:

- Provide adequate sites to achieve a variety and diversity of housing types
- Facilitate the development of affordable housing stock
- Promote equal housing opportunity
- Remove potential constraints to affordable housing development
- Address and, if necessary, improve the existing affordable housing

Housing Plan

The goals we have set in this plan respond to the overarching objectives listed above, and our housing programs implement the respective policies of these goals. Included in each program are a description of its primary components, the timeframe for accomplishment, available funding source, and the key objective of each program. Each objective establishes a benchmark of implementing each housing program during the 2021-2029 Housing Element period.

SB 1087 of 2005 requires cities to provide a copy of their Housing Elements to local water and sewer providers, and also requires that these agencies provide priority hookups for developments with lower-income housing. The Housing Element will be provided to these agencies immediately upon adoption.



Goals and Policies

Our goals and policies for housing in the City of La Palma for the 2021-2029 planning period are described below:

Adequate Sites and Diversity of Housing Options

A range of housing options is necessary to support an economically and socially diverse community such as ours. Adequate public facilities and services are important to maintain the quality of life valued by all of our City's residents. We also value the important investment represented by our existing housing stock.

GOAL 1:	**Continue to keep land use regulations in place that allow for diverse housing opportunities that satisfy the physical, social, and economic needs of existing and future La Palma residents, including those with special needs (large families, single parent households, senior citizens, persons with physical and developmental disabilities, and the homeless).**

Policy 1.1	**Maintain a diversity of zoning districts that allow for new residential development at a range of densities.**
Policy 1.2	**Ensure that housing and neighborhoods are provided with public services that provide for safe and sanitary living conditions.**
Policy 1.3	**Support innovative public, private, and nonprofit efforts in the development of affordable housing, particularly for special needs groups.**

High-Quality Residential Development

Our City celebrates our high-quality single-family neighborhoods. It is essential to the social, physical, and economic well-being of the City that this housing stock be actively maintained and enhanced through the policies and programs in this Housing Element.

GOAL 2:	**Achieve high design quality in all residential developments to ensure that investments in neighborhoods, as well as safety and aesthetic value, are respected and maintained.**

Policy 2.1	**Enforce Municipal Code regulations that promote the maintenance of residential properties.**
Policy 2.2	**Provide public services and improvements that support and improve neighborhood longevity and cohesion.**

Removal of Housing Constraints

Government constraints are City policies, standards, or requirements that may have the potential to constrain the production of affordable housing under certain circumstances. High development fees, complicated processing procedures, and challenging development standards are often cited as factors that impact the ability of developers to provide market rate and affordable housing.

GOAL 3:	**Optimize City processes and regulations that relate to the maintenance, improvement, and development of housing.**

Policy 3.1	**Remove land use barriers that pertain to emergency and transitional housing.**
Policy 3.2	**Assist developers of emergency and transitional housing in locating sites, and streamline the approval and permitting process for this type of housing.**
Policy 3.3	**Use the B-1 Mixed Use Business zone to promote the development of high-quality, high-density housing that is affordable to households of all income ranges.**
Policy 3.4	**Periodically review development standards and procedures to ensure consistency with the General Plan and streamline the development review process.**
Policy 3.5	**Facilitate high-quality workforce housing developments.**

Equal Housing Opportunity

Discriminatory housing practices are prohibited by national and state fair housing laws. Discriminatory practices impede housing opportunities for all La Palma residents.

GOAL 4:	**Ensure that housing opportunities are available to all persons.**

Policy 4.1	**Support the enforcement of laws and regulations that prohibit discrimination in mortgage lending practices and in the sale or rental of housing.**
Policy 4.2	**Support efforts aimed at guaranteeing unrestricted access to housing for all segments of the community.**
Policy 4.3	**Encourage and support private and nonprofit groups in their efforts to address the housing needs of the homeless and other disadvantaged groups.**

Housing Programs and Action Plan

The City's housing programs for the 2021-2029 planning period are described below.

Housing Programs

1. Section 8 Rental Assistance

The Orange County Housing Authority administers the Section 8 Voucher Program for several Orange County cities, including La Palma. The Section 8 program provides rental assistance (subsidies) to low- and moderate-income families, the elderly, and disabled persons who spend more than 30 percent of their monthly income on rent. The subsidy represents the difference between 30 percent of the recipient's monthly income and the federally approved fair market rent (FMR). This program helps to address problems of overpayment and overcrowding.

Under the Housing Choice Voucher program, the landowner enters into a contract with the local Housing Authority. Eligible tenants must pay the difference between the fair market rate for rent and the actual rent. Housing subsidized through this program must meet the standards of safety and sanitation established by HUD.

The City cannot directly influence the number of Section 8 certificate/vouchers available to residents; however, the City supports the efforts of the Housing Authority to obtain additional funding from HUD to provide subsidies.

Responsible Agency: Orange County Housing Authority (OCHA)

Timeframe: Ongoing

Funding Source: HUD (limited City staff time)

Objective: Support OCHA's efforts to increase the amount of funding allocated to HUD programs. Provide referrals continuously to apartment complex owners for information on the Section 8 Housing Choice Voucher

program. Continue to participate annually in the County Housing Authority's Committee for Municipalities participating in Section 8 County-Administered programs.

2. Funding for Preservation and Rehabilitation of Affordable Housing

Through the federal Community Development Block Grant (CDBG) program, HUD provides funds to local governments for a range of community development activities that benefit lower-income households. The Orange County Community Services Department is responsible for distributing CDBG funds to the smaller cities in Orange County under the Urban County program. The City Council maintains a Cooperative Agreement with the County of Orange to participate in the annual CDBG and HOME fund Urban County competitive process. The City intends to continue the agreement in order to ensure that local affordable housing opportunities remain.

In addition, the City will participate with non-profit housing authorities to preserve lower-income multi-family housing in the City and/or to convert market-rate multi-family housing into covenanted affordable housing, as opportunities arise. Funding for the program will be provided through the issuance of tax-exempt affordable housing bonds. Such funding will be utilized to preserve low- and very-low-income units. This program helps to address the needs of extremely-low-income households and related problems of overpayment and overcrowding.

Responsible Agency: Community Development Department; Orange County Community Services Department

Timeframe: Ongoing

Funding Source: CDBG grant funds (HUD); Affordable Housing Bonds

Objective: Apply for and utilize CDBG and HOME and/or other available funds annually to preserve and rehabilitate affordable housing units. Participate with non-profit housing entities to preserve at-risk affordable multi-family housing and/or convert market-rate housing into covenanted affordable housing on a continuous basis.

3. Mortgage Assistance Certificate Program

A Mortgage Assistance Program for low-income first-time homebuyers is administered by the Affordable Housing Clearinghouse under contract with Orange County Housing & Community Services. The program provides down payment assistance, targeted at the population with incomes at or below 80 percent of the area median income. The City could increase participation in the program by actively publicizing it on the City's website.

The City will publicize the availability of the Mortgage Assistance Program to local residents. Potential avenues of advertisement include:

- Publishing information about these programs in the City's quarterly La Palma newsletter, which is distributed to all households; and

- Posting information about these programs in the City's public library and community center, on the City Hall bulletin board, on the community center reader board, and on the City website.

Responsible Agency: Orange County Community Services (Affordable Housing Clearinghouse)

Timeframe: Ongoing

Funding Source: Cal Home funds and federal tax credits

Objective: Publicize availability of Orange County mortgage assistance programs by providing links between the County's and City's websites.

4. Mortgage Credit Certificate Program

The Mortgage Credit Certificate (MCC) Program is a federal Income Tax Credit Program administered by the County of Orange. The MCC program was originally created by Congress through the Tax Reform Act of 1986. The program provides assistance to first-time homebuyers in the purchase of owner-occupied residential units. The MCC program increases the loan amount offered to a qualifying homebuyer and reduces federal income taxes by 15% of the annual interest paid on a home mortgage. The MCC program entitles qualified home buyers to reduce the amount of their federal income tax liability by an amount equal to a portion of the interest paid during the year on a home mortgage. This tax credit allows the buyer to qualify more easily for a loan by increasing the effective income of the buyer. Because the borrower's taxes are being reduced by the amount of the credit, this increases the take-home pay by the amount of the credit, thus enabling the buyer to qualify for a larger loan than would otherwise be possible.

The City will publicize the availability of the Mortgage Credit Certificate Program to local residents. Potential avenues of advertisement include:

- Publishing information about these programs in the City's quarterly La Palma newsletter, which is distributed to all households; and
- Posting information about these programs in the City's public library and community center, on the City Hall bulletin board, on the community center reader board, and on the City website.

Responsible Agency: Orange County Community Services (Affordable Housing Clearinghouse)

Timeframe: Ongoing

Funding Source: Cal Home funds and federal tax credits

Objective: Publicize availability of Orange County mortgage assistance programs by providing links between the County's and City's websites.

5. Reverse Mortgage Program

This program targets elderly homeowners who are cash poor but have substantial equity in their homes. Homeowners can draw needed income from the accumulated equity in their home through a reverse mortgage.

The reverse mortgage is a deferred payment loan, or a series of such loans, for which a home is placed as security. Reverse mortgage programs typically permit homeowners to borrow up to 80 percent of the assessed value of their property, receive needed principal of up to 25 percent of the loan, and receive monthly annuity payments for the life of the loan.

NeighborWorks Orange County provides information to seniors seeking this type of loan. Responsibilities include providing counseling to seniors interested in applying, working with private lending institutions, and working with seniors to complete applications.

The City will publicize the availability of the reverse mortgage program. Potential avenues of advertisement include:

- Publishing information about the program in the City's quarterly La Palma newsletter, distributed to all households
- Posting information about the program in the public library and community center, on the City Hall bulletin board, on the community center reader board, and on the City website
- Referral of eligible senior homeowners to the County Housing Authority to obtain counseling

Responsible Agency: Community Development Department, NeighborWorks Orange County

Timeframe: Ongoing

Funding Source: Private sector

Objective: Publicize the availability of the reverse mortgage program. Refer all eligible parties who contact the City with an interest in this program to NeighborWorks Orange County.

6. Section 202 Elderly or Handicapped Housing

Under this federally administered program, direct loans are made to eligible, private nonprofit sponsors to finance the development of rental or cooperative housing facilities for occupancy by elderly or handicapped persons. The interest rate on such loans is determined annually. Section 8 funds are made available for all of the Section 202 units for the elderly. Rental assistance for 100 percent of the units for handicapped persons is also available.

Private nonprofit sponsors may qualify for Section 202 financing. Households of one or more persons, the head of which is at least 62 years old or is a qualified non-elderly handicapped between the ages of 18 and 62, are eligible to live in these units.

While directed at the elderly and handicapped, this program helps to address the needs of extremely low-income households and related problems of overpayment and overcrowding.

Responsible Agency: Community Development Department (oversight)

Timeframe: Ongoing

Funding Source: HUD Section 202 funds

Objective: Facilitate development of elderly and handicapped housing by assisting with federal housing applications, providing density bonus incentives, and providing "gap" financing where possible, such as through application for CDBG funds. Support all viable nonprofit entities seeking Section 202 funding.

7. Home Spotlight Award Program

The majority of the housing stock in the City was constructed by the late 1970s. The stock is aging but of high quality, and is a source of pride in the community. To ensure the continued maintenance of the housing stock, the Home Spotlight Award program will continue to recognize homes within the community as an incentive for home maintenance and upkeep. Awards will be made to occupants demonstrating home maintenance values the City wishes to promote in areas such as exterior upkeep of the property and landscaping.

Responsible Agency: Community Activities and Beautification Committee

Timeframe: Ongoing as funds allow

Funding Source: General Fund

Objective: Annual review, as funds allow, continue the Home Spotlight Award Program rewarding high standards of property maintenance.

8. Emergency Shelters, Low Barrier Navigation Centers, Transitional and Supportive Housing, and Agricultural Employee Housing

The homeless are those persons lacking consistent and adequate shelter. Homeless persons can be considered extremely-low-income residents (those remaining in an area year-round) or transient. Emergency shelters, transitional housing, and supportive housing can help to address the needs of the homeless.

Emergency shelters provide short-term aid to persons who are homeless and involve limited supplemental services. Transitional and supportive housing, in contrast, is directed at removing the basis for homelessness. Transitional and supportive housing is provided for an extended period of time, and is combined with other social services and counseling to assist in the transition from homelessness to self-sufficiency. The General Industrial District allows emergency shelters by-right and has sufficient capacity to accommodate the City's need for emergency shelter facilities.

In recent years, several changes in State law have been adopted related to these types of facilities. AB 139 (2019) revised State law regarding parking standards for emergency shelters. In 2018 AB 2162 amended State law to require that supportive housing be a use by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria. AB 101 (2019) added the requirement that *low barrier*

navigation centers meeting specified standards be allowed by-right in areas zoned for mixed use and in non-residential zones permitting multi-family uses pursuant to Government Code §65660 et seq. The City is currently processing a Development Code amendment to revise parking standards for emergency shelters and allow supportive housing and low barrier navigation centers consistent with State law.

In addition, the City will process a zoning amendment related to agricultural employee housing in conformance with the Employee Housing Act in 2021-22.

Responsible Agency: Community Development Department

Timeframe: Development Code amendments related to emergency shelter parking standards, low-barrier navigation centers, supportive housing, and agricultural employee housing in 2021-22

Funding Source: General Fund

Objectives: Encourage the provision of emergency shelters, low barrier navigation centers, transitional/supportive housing and agricultural employee housing consistent with State law

9. Density Bonus

Under State law (California Government Code §69915) a density bonus and regulatory concessions are available to developments that provide affordable housing.

State Density Bonus law was recently amended to provide additional incentives for affordable housing production. Section 44-305 of the Municipal Code incorporates current density bonus regulations in conformance with State law.

The City will continue to promote the Density Bonus program to encourage its use. Possible avenues of advertisement include developing a handout to be placed at the Planning and Building Counter in City Hall; these handouts may be delivered to local developers, property owners, and business groups such as the Orange County Business Council and the Building Industry Association of Southern California.

Responsible Agency: Community Development Department

Timeframe: Ongoing implementation

Funding Source: General Fund

Objective: Encourage the development of affordable housing by promoting the Affordable Housing Regulations to interested developers and property owners.

10. Residential Land Use Designations and Controls

This Housing Element update reflects current General Plan land use designations that respond to the needs of the City. The City will continue to monitor changes in State law related to housing that could affect City land use regulations and process any amendments that may be necessary to comport with new legislation.

In recent years, the State Legislature has adopted several bills addressing housing production and established that if a residential addition or a remodel construction complies with Municipal Code standards and does not require a variance, then the City shall approve it administratively without a public hearing. The City will review and amend its residential addition and remodel review process in the Municipal Code and process an Ordinance accordingly to ensure Municipal Code compliant residential additions and remodels are reviewed and approved administratively.

The City will also continue to monitor changes in State housing law related to accessory dwelling units (ADUs) and amend City regulations as necessary to ensure conformance with State law.

Responsible Agency: Community Development Department

Timeframe: Municipal Code amendment in 2021-22; ongoing monitoring

Funding Source: General Fund

Objective: Ensure consistency between the General Plan, the Development Code, and State law.

11. Affirmatively Furthering Fair Housing

The Fair Housing Council of Orange County provides a range of fair housing services, including housing discrimination response, landlord-tenant relations, housing information and counseling, and community education programs. Many of the persons served by this program are likely to be extremely-low-income. The City will support the Fair Housing Council by promoting these services. Potential avenues of advertising include publishing information in the quarterly La Palma newsletter, which is distributed to all households, placing flyers at the library and the community center, and posting information on the City's website.

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 to implement the regional Analysis of Impediments to Fair Housing Choice and HUD Consolidated Plan.
- Facilitate public education and outreach by posting informational flyers on fair housing at public counters and libraries, and on the City's website.
- 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.
- Encourage community and stakeholder engagement during development decisions.

Responsible Agency: Community Development Department

Timeframe: Ongoing

Funding Source: General Fund

Objective: Support the activities of the Fair Housing Council by publicizing its referral service to local residents and continue to affirmatively further fair housing.

12. Reasonable Accommodation for Persons with Disabilities

In conjunction with each Housing Element update, the City will analyze whether City practices or other factors place constraints on the development, maintenance, and improvement of housing intended for persons with disabilities, consistent with Senate Bill 520. As the policies in this element indicate, the City is committed to amending land use controls, permit and processing procedures, and building codes to removing any perceived constraints. The City developed reasonable accommodation procedures in 2013 and will continue to make information regarding the process available at City counters.

Responsible Agency: Community Development Department

Timeframe: Ongoing

Funding Source: General Fund

Objective: Make reasonable accommodation information readily available to the public.

13. Facilitate Housing Development to Accommodate Regional Needs

The Regional Housing Needs Assessment (RHNA) allocation to the City of La Palma for extremely-low-, very low-, low-, moderate-, and above moderate-income units for the 2021-2029 planning period is as follows:

- Very Low Income: 224 units (includes 112 extremely-low units)
- Low Income: 140 units
- Moderate Income: 137 units
- Above Moderate: 301 units

The City's Residential Land Inventory (Appendix C, Table C-34) demonstrates that adequate sites are available to accommodate the RHNA. In 2014 the General Plan was amended to expand opportunities for new mixed-use development in the northern portion of the city north of Orangethorpe Avenue. This mixed-use area is expected to provide the most significant opportunities for new housing in La Palma during the 2021-2029 planning period. To encourage residential and mixed-use development in this area, including units for extremely-low-income households and persons with special needs, the City will process an amendment to the Zoning Ordinance in 2021/22 to ensure that regulations encourage development consistent with the General Plan. The amendment will include review of the Precise Plan process to ensure that it does not unreasonably hinder housing development.

The City will transmit the Housing Element to water and sewer providers with information regarding the RHNA allocation and State requirements for priority water and sewer service to developments with lower-income units pursuant to Government Code §65589.7.

The City will also comply with new transparency requirements for posting all zoning, development standards and fees for each parcel on the City website and develop written procedures for SB 35 streamlined review in 2021/22.

To encourage ADU development, the City will continue to waive planning fees, expedite ADU applications, and promote ADUs through the City website.

Responsible Agency: Community Development Department

Timeframe: Ongoing

Funding Source: General Fund

Objectives: Review and amend mixed-use development regulations in 2021/22 to encourage housing densities consistent with the General Plan that facilitate affordable housing development. Waive application fees for lot merger and/or rezoning on sites identified to meet the RHNA. Accommodate the RHNA for each income category during the 2021-2029 planning period. Provide technical assistance and information on available parcels for lower-income developments at the request of private or non-profit housing providers. Technical assistance includes land development counseling by City planners; sites identified in the Housing Element will be discussed with interested parties. Maintain the sites inventory and Housing Element on the City's website. Encourage ADU development.

Quantified Objectives

The City's quantified objectives for new construction are presented in Table 4-1. No quantified objectives are provided for rehabilitation, because

no funds can be identified for rehabilitation programs. However, policies are in place to allow for rehabilitation in the event funding sources become available during the planning period.

Table 4-1
Quantified Objectives – 2021-2029

	Income Category					
	Ex. Low	Very Low	Low	Mod	Upper	Total
New Construction[1]	112	112	140	137	301	802
Rehabilitation	2	2	2	2		8
Conservation[2]	35		272	3	0	310

Notes:
1. Quantified objective for new construction is for the period 7/1/2021 – 10/15/2029 per the RHNA.
2. Assisted lower-income units (no assisted units are at risk of conversion)

Housing Element 4-1
Introduction 4-1
Housing Plan 4-2
Housing Programs and Action Plan 4-5
Quantified Objectives 4-13

Table 4-1 Quantified Objectives – 2021-2029 4-14

CITY OF LA PALMA
GENERAL PLAN

Appendix C – Housing Element Technical Report

1. Introduction
2. Needs Assessment
3. Housing Constraints
4. Housing Resources
5. Progress Report

Housing Element Technical Report

1. Introduction

This Appendix C focuses on the data and analysis from which housing policy commitments in the Housing Element are derived. Chapter 4 of the General Plan contains the goals, objectives, policies, and programs based on this Appendix. Combined, they cover the scope required by the California Government Code for Housing Elements in local General Plans.

The Housing Element is one of the seven General Plan elements mandated by the State of California, as articulated in §65580 to §65589.8 of the Government Code. State law requires that the Housing Element consist of "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 residential nature of the City is, to a large extent, determined by the variety and location of its housing and particularly, the maintenance of that housing.

The Housing Element is an official municipal response to the need to accommodate housing for all economic segments of the population within La Palma. It establishes policies that will guide City decision-making and sets forth an action program to implement housing goals.

1.1 Housing Element Organization

The La Palma Housing Element includes the following components:

- A Housing Needs Assessment (Section 2 of this Appendix C), which includes population trends and characteristics, employment trends, household characteristics, housing stock characteristics, and the housing needs summary.
- A summary of Housing Constraints (Section 3 of this Appendix C), which includes market constraints and governmental constraints.
- A Housing Resources Section (Section 4 of this Appendix C), which reviews availability of sites for housing and available administrative and financial resources.
- A Progress Report (Section 5 of this Appendix C) reviewing performance to date for the 2013-2021 Housing Element.
- A Housing Plan (Chapter 4 of the General Plan), which includes the goals and policies for the implementation of the element and our housing programs. The plan also includes quantified objectives and a detailed action plan.

The state-mandated Housing Element components are identified in **Table C-1**, together with a reference to the sections of this document in which they are addressed.

Table C-1: Housing Element Components

Required Component	Reference
A. HOUSING NEEDS ASSESSMENT	
Analysis of population trends in La Palma in relation to regional trends.	Section 2
Analysis of employment trends in La Palma in relation to regional trends.	Section 2
Projection and quantification of La Palma's existing and projected housing needs for all income groups.	Section 2
Analysis and documentation of La Palma's housing characteristics including the following: a. Level of housing cost compared to ability to pay b. Overcrowding c. Housing Stock Condition d. Assisted Housing Developments	 Section 2 Section 2 Section 2 Section 2
Analysis of special housing needs: handicapped, elderly, large families, female-headed households, farm workers	Section 2
Analysis concerning the needs of homeless individuals and families in La Palma.	Section 2
Analysis of existing and potential governmental constraints upon the maintenance, improvement, or development of housing for all income levels.	Section 3

Required Component	Reference
Analysis of existing and potential non-governmental and market constraints upon maintenance, improvement, or development of housing for all income levels.	Section 3
An inventory of land suitable for residential development, including vacant sites and land having redevelopment potential, and an analysis of the relationship of zoning, public facilities, and services to these sites.	Section 4
Analysis of opportunities for energy conservation with respect to residential development.	Section 4
Review of appropriateness, effectiveness, and progress of the City in implementation of the previous Housing Element	Section 5
B. GOALS AND POLICIES	
Identification of La Palma's goals, policies and quantified objectives relative to maintenance, improvement and development of housing.	Chapter 4, Housing Element
C. IMPLEMENTATION PROGRAM	
An implementation program should do the following:	
Identify adequate sites, which will be made available through appropriate action with required public services and facilities for a variety of housing types for all income levels.	Section 4 and Chapter 4, Housing Element
Outline a program to assist in the development of adequate housing to meet the needs of low and moderate-income households.	Chapter 4, Housing Element
Identify and, when appropriate and possible, remove governmental constraints to the maintenance, improvement and development of housing in La Palma.	Chapter 4, Housing Element
Conserve and improve the condition of the existing and affordable housing stock in La Palma.	Chapter 4, Housing Element
Promote housing opportunities for all persons.	Chapter 4, Housing Element
Preserve lower income household assisted housing developments.	Chapter 4, Housing Element

1.2 General Plan Consistency

The Housing Element of the General Plan is only one facet of a city's planning program. The California Government Code requires that General Plans contain an integrated, consistent set of goals and policies. The Housing Element is therefore affected by development policies contained in the Land Use Element, which establishes the location, type, intensity, and distribution of land uses throughout the City. The Circulation Element establishes policies for providing essential streets and roadways to all housing that is developed. The policies in other elements of the General Plan affect the quality of life that citizens desire. As portions of the General Plan are amended in the future, all elements of the General Plan, including the Housing Element, will be reviewed and amended as necessary to ensure internal consistency.

1.3 Public Participation

Public participation was an important component of the Housing Element update process. A website was created to provide interested parties with information and reference materials including a Housing Element FAQ, meeting notices, draft documents and links to related information. Meeting notices were also mailed to the list of interest persons (**Table C-2**) and organizations including those with particular expertise in fair housing and special needs issues.

The following public meetings were conducted to provide opportunities for interested persons to provide comments and recommendations during the Housing Element process:

March 2, 2021	City Council Study Session
October 5, 2021	City Council Public Hearing

Comments during the public review process included the following:

(Insert after City Council hearing)

Table C-2: Public Notification 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@lwvorangecoast.org

OC Association of Realtors
25552 La Paz Road
Laguna Hills, CA 92653

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

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

Jamboree Housing Corp.
17701 Cowan Avenue, Suite 200
Irvine, CA 92614

The Related Companies of California
18201 Von Karman Ave Ste 900
Irvine, CA 92612

Community Housing Resources, Inc.
17701 Cowan Avenue, Suite 200
Irvine, CA 92614

BIA/OC
17744 Sky Park Circle #170
Irvine, CA 92614

Dayle McIntosh Center
501 N. Brookhurst Street, Suite 102
Anaheim, CA 92801

OC Housing Providers
25241 Paseo de Alicia, Suite 120
Laguna Hills, CA 92653

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

OC Business Council
2 Park Plaza, Suite 100
Irvine, CA 92614

OC Housing Trust
198 W. Lincoln Ave., 2nd Floor
Anaheim, CA 92805

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

Mercy Housing
480 S Batavia St
Orange, CA 92868

OC Housing & Community Development
Attn: Rebecca Leifkes
1501 E. St Andrew Place, First Floor
Santa Ana, CA 92705

Orange County Housing Authority
1501 E St Andrew Pl
Santa Ana, CA 92705

City of Buena Park City Hall
6650 Beach Blvd.
Buena Park, CA 90622-5009

City of Cypress City Hall
5275 Orange Avenue
Cypress, CA 90630

City of Cerritos City Hall
P.O. Box 3130
Cerritos, CA 90703

Orange County Water District
P.O. Box 8300
Fountain Valley, CA 92728-8300

Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

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

Attn. Lea U. Choum
Airport Land Use Commission
3160 Airway Avenue
Costa Mesa, CA 92626

2. Housing Needs Assessment

Ensuring the availability of adequate housing for all social and economic sectors of the City's present and future population is an important goal for La Palma. This section of the Housing Element discusses the characteristics of the City's present and future population and housing stock to better define the nature and extent of the unmet housing needs in the City. Specifically, it examines general population and household characteristics and trends, such as age, employment, household composition and size, household income, and special needs. Characteristics of the existing housing stock (e.g., number of units and type, tenure, age and condition, costs) are also addressed. Finally, the City's projected housing needs based on the 2021-2029 Regional Housing Needs Assessment (RHNA) are examined.

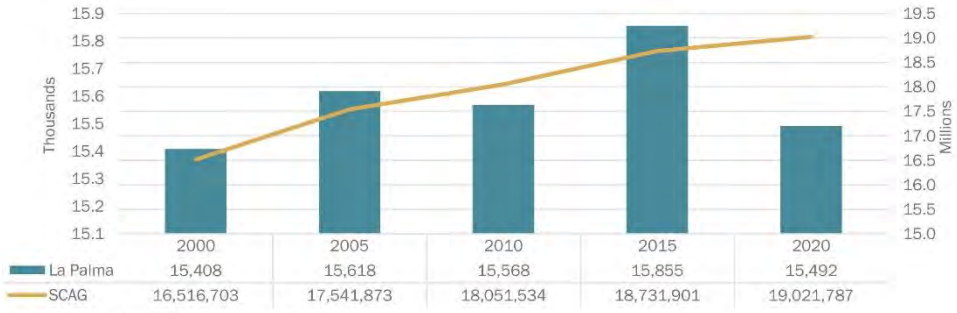
The Housing Needs Assessment utilizes the most recent data from the U.S. Census and the American Community Survey, California Department of Finance (DOF), California Employment Development Department (EDD), Southern California Association of Governments (SCAG), and other relevant sources.

2.1 Population Trends and Characteristics

2.1.1 Population Trends

La Palma has a 2020 total population of 15,492 including 20 living in group quarters according to the California Department of Finance. **Table C-3** describes the population trend in La Palma from 2000 to 2020. Over this period La Palma had an annual growth rate of 0% compared to 0.7% for the SCAG region[1] as a whole.

Table C-3: Population Trends, 2000-2021



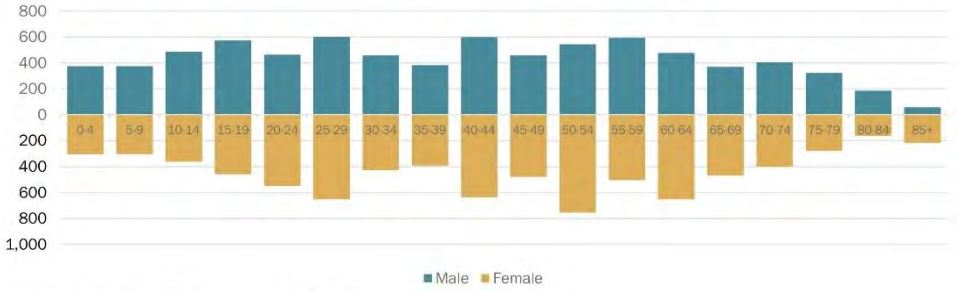
CA DOF E-5 Population and Housing Unit Estimates

1 The SCAG region includes Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura counties.

2.1.2 Population by Age

The age breakdown of a population is an important factor in evaluating housing needs. **Table C-4** illustrates recent Census estimates of the age distribution of La Palma residents by gender. The population of La Palma is 49.1% male and 50.9% female. The share of the population of La Palma that is under 18 years of age is 17.5%, which is lower than the regional share of 23.4%. La Palma's seniors (65+) make up 18.2% of the population, which is higher than the regional share of 13%.

Table C-4: Age Distribution by Gender

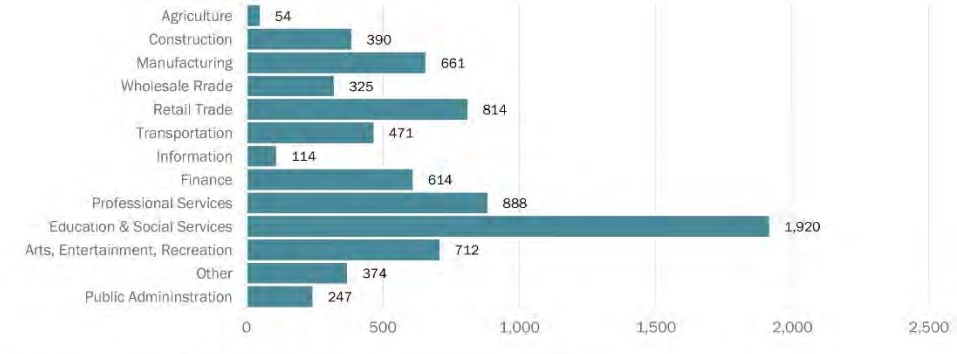


American Community Survey 2014-2018 5-year estimates

2.1.3 Employment

Current employment and projected job growth have a significant influence on housing needs. **Table C-5** shows recent Census estimates of employment by industry for La Palma residents. The most prevalent industry is Education & Social Services with 1,920 employees (25.3% of total) while the second most prevalent industry is Professional Services with 888 employees (11.7% of total).

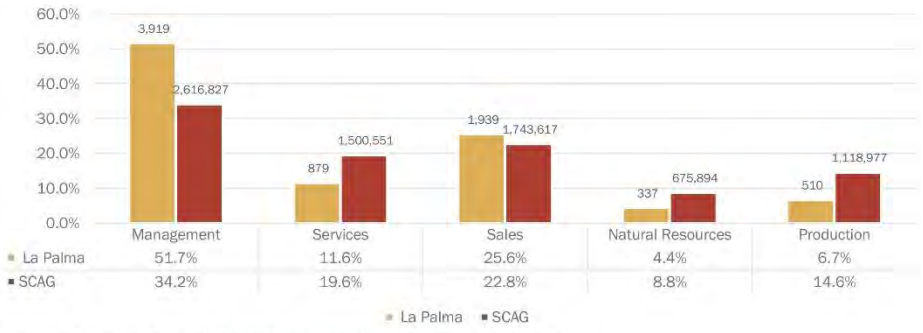
Table C-5: Employment by Industry



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

In addition to understanding the industries in which the residents of La Palma work, it is also possible to analyze the types of jobs they hold. The most prevalent occupational category in La Palma is Management, in which 3,919 (51.7% of total) employees work. The second-most prevalent type of work is in Sales, which employs 1,939 (25.6% of total) in La Palma (**Table C-6**).

Table C-6: Employment by Occupation



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

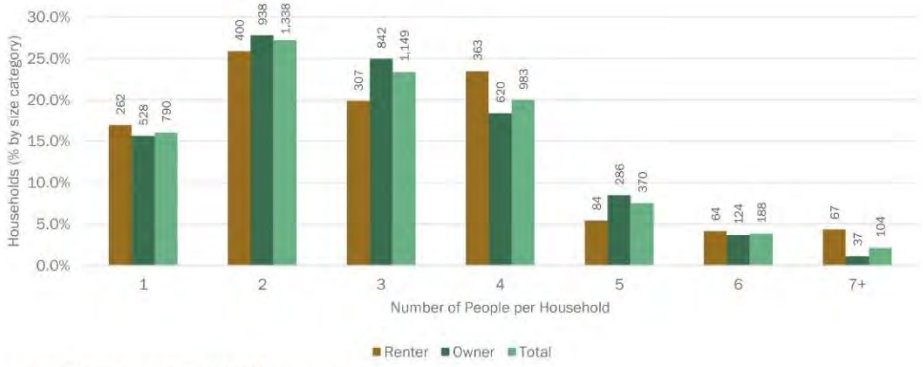
2.2 Household Characteristics

2.2.1 Household Composition and Size

The U.S. Census defines a household as all persons who occupy a housing unit, regardless of whether these persons are related by birth, marriage, or adoption, or are unrelated. People living in retirement or convalescent homes, dormitories, or other group living situations are not considered households. The characteristics of the households living in a city are important indicators of the type of housing needed in that community.

Table C-7 illustrates the range of household sizes in La Palma for owners, renters, and overall. The most commonly occurring household size is of two people (27.2%) and the second-most commonly occurring household is of three people (23.3%). La Palma has a lower share of single-person households than the SCAG region overall (16.1% vs. 23.4%) and a lower share of 7+ person households than the SCAG region overall (2.1% vs. 3.1%).

Table C-7: Household Size by Tenure



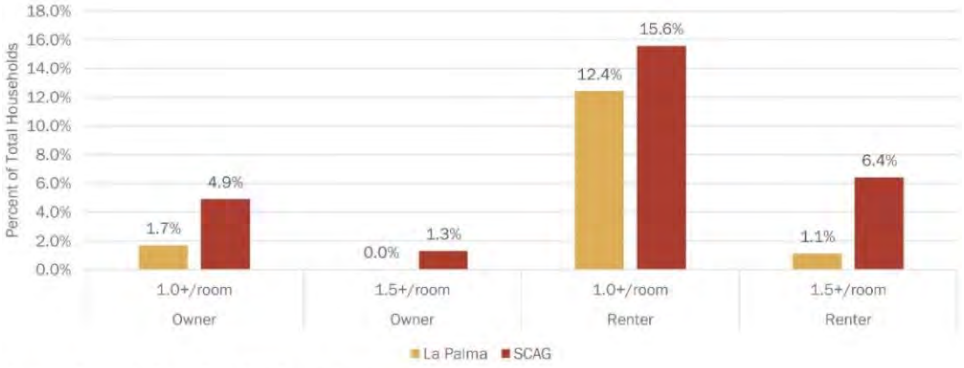
American Community Survey 2014-2018 5-year estimates.

2.2.2 Overcrowding

The federal government defines an overcrowded household as having more than one person per room, excluding bathrooms, kitchens, hallways, and porches. Severe overcrowding occurs when there are more than 1.5 persons per room. Overcrowding results from either a lack of affordable housing (which forces more than one household to live together) and/or a lack of available housing units of adequate size.

According to recent Census estimates, 57 owner-occupied and 192 renter-occupied households in La Palma had more than 1.0 occupants per room, and 17 renter-occupied households had more than 1.5 occupants per room, indicating severe overcrowding (**Table C-8**).

Table C-8: Overcrowding by Tenure



American Community Survey 2014-2018 5-year estimates.

Programs 1 (Section 8 Rental Assistance) and 13 (Adequate Sites) in the Housing Plan will help to address these needs.

2.2.3 Household Income

Household income is a primary factor affecting housing needs in a community, particularly for extremely-low-income households, defined as 30% of median income or less. According to recent Census data, approximately 14% of households in La Palma were within the extremely-low-income (ELI) category, and renters were much more likely than owners to fall within the ELI category (**Table C-9**). Program 1 (Section 8 Rental Assistance), Program 2 (Funding for Preservation and Rehabilitation of Affordable Housing), Program 6 (Section 202 Elderly or Handicapped Housing), Program 8 (Emergency, Transitional and Supportive Housing), Program 9 (Density Bonus), Program 11 (Affirmatively Furthering Fair Housing) and Program 13 (Adequate Sites) in the Housing Plan will help to address the housing needs of extremely-low-income households.

Table C-9: Extremely Low Income Households

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	1,619	225	13.9%
Black, non-Hispanic	370	55	14.9%
Asian and other, non-Hispanic	2,283	255	11.2%
Hispanic	709	169	23.8%
TOTAL	**4,981**	**704**	**14.1%**
Renter-occupied	1,600	425	26.6%
Owner-occupied	3,390	270	8.0%
TOTAL	**4,990**	**695**	**13.9%**

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

2.2.4 Housing Affordability and Overpayment

Housing Affordability Criteria

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

Table C-10 shows affordable rent levels and estimated affordable purchase prices for housing in La Palma (and Orange County) by income category. Based on State-adopted standards for a 4-person family, the maximum affordable monthly rent for extremely-low-income households is $961, while the maximum affordable rent for very-low-income households is $1,601. The maximum affordable rent for low-income households is $2,562, while the maximum for moderate-income households is $3,090. Maximum purchase prices are more difficult to determine due to variations in mortgage interest rates and qualifying procedures, down payments, special tax assessments, homeowner association fees, property insurance rates, etc. With this caveat, the maximum affordable home purchase price for moderate-income households has been estimated based on typical conditions. Affordable prices have not been estimated for the lower-income categories because most for-sale affordable housing is provided at the moderate-income level.

Table C-10: Income Categories and Affordable Housing Costs – Orange County

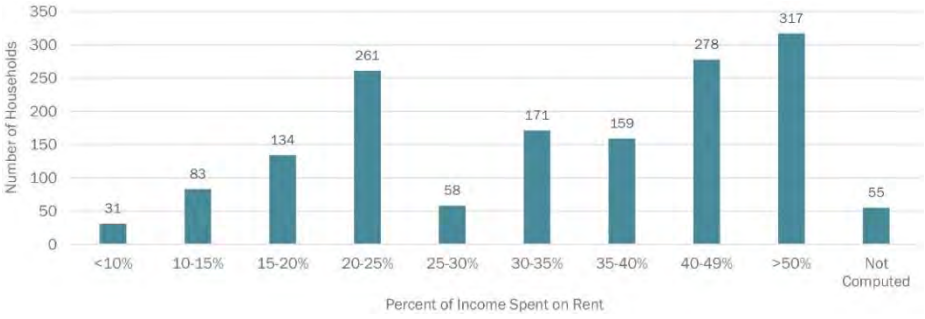
Income Category	Maximum Income	Affordable Rent	Affordable Price (est.)
Extremely low	$40,350	$1,009	*
Very low	$67,250	$1,681	*
Low	$107,550	$2,689	*
Moderate	$128,050	$3,201	$500,000
Above moderate	>$128,050	>$3,201	>$500,000

Assumptions:
-Based on a family of 4 and 2021 State income limits
-30% of gross income for rent or principal, interest, taxes & insurance
-5% down payment, 3.75% interest, 1.25% taxes & insurance, $350 HOA dues
Notes:
*For-sale affordable housing is typically at the moderate-income level
Source: Cal. HCD; JHD Planning LLC

Rental Housing

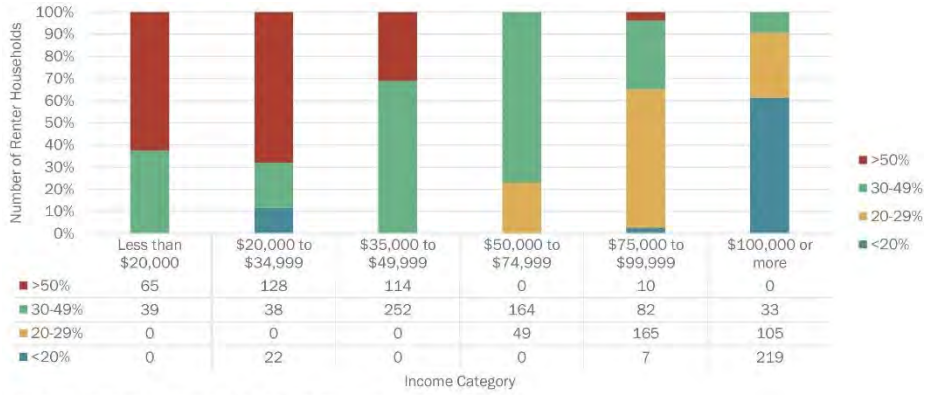
Across La Palma's 1,547 renter households, 925 (59.8%) spend 30% or more of gross income on housing cost, compared to 55.3% in the SCAG region. Additionally, 317 renter households in La Palma (20.5%) spend 50% or more of gross income on housing cost, compared to 28.9% in the SCAG region (**Table C-11**).

Table C-11: Percentage of Income Spent on Rent – La Palma



Recent Census data also allows for the analysis of La Palma's 1,492 renter households (for which income data are available) by spending on rent by income bracket. As one might expect, the general trend is that low-income households spend a higher share of income on housing (often more than 50%) while high-income households are more likely to spend under 20% of income on housing (**Table C-12**).

Table C-12: Rental Expenses by Income – La Palma



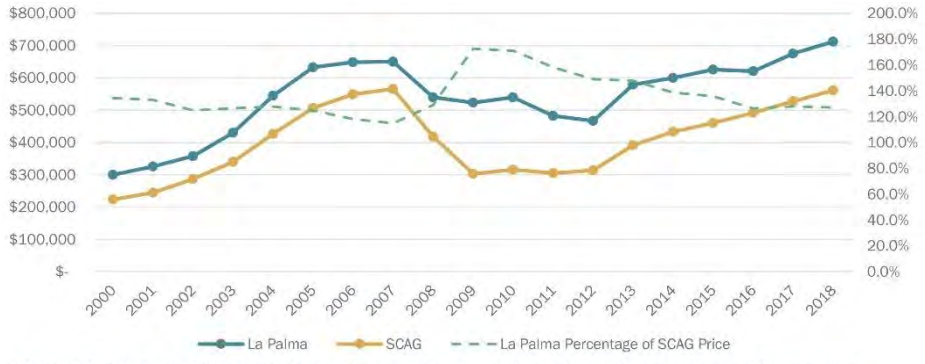
	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 to $99,999	$100,000 or more
>50%	65	128	114	0	10	0
30-49%	39	38	252	164	82	33
20-29%	0	0	0	49	165	105
<20%	0	22	0	0	7	219

American Community Survey 2014-2018 5-year estimates.

For-Sale Housing

Median sale prices for existing homes in La Palma compared to the region as a whole are shown in **Table C-13**. This table shows that home values were consistently higher in La Palma than the regional average.

Table C-13: Median Sale Price for Existing Homes – La Palma vs. SCAG Region



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

While renter households receive much of the focus when it comes to housing cost analysis, owners comprise 68.6% of households in La Palma as compared to only 52.5% in the region as a whole. The most commonly occurring mortgage payment in La Palma is $2,000 to $3,000 per month, while the most commonly occurring mortgage payment in the SCAG region is $2,000 to $3,000 per month.

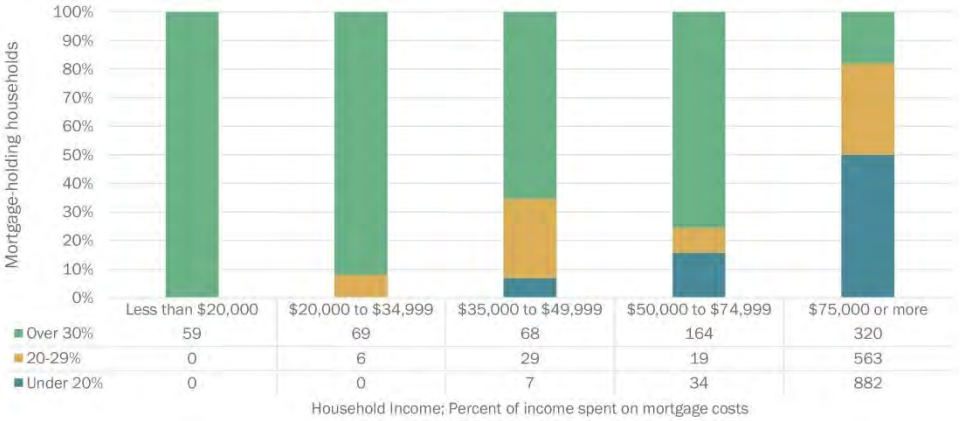
Table C-14: Monthly Mortgage Cost – La Palma vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

Table C-15 shows monthly mortgage cost by income category for La Palma homeowners. Mortgage-holding households in La Palma 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. The income category most prevalent among La Palma mortgage holders is $75,000 or more (1,765 households) while the most prevalent share of income spent on mortgage costs is under 20% (923 households).

Table C-15: Monthly Mortgage Cost by Income – La Palma



Overpayment

According to State housing policy, overpaying (or "cost burden") occurs when housing costs exceed 30% of gross household income. **Table C-16** displays recent estimates for overpayment by income category for La Palma residents and shows that overpayment is much more frequent for households at the extremely-low and very-low income levels than those households in higher income categories.

A household spending more than it can afford for housing has less money available for other necessities and emergency expenditures. Lower-income renter households overpaying for housing are more likely to be at risk of becoming homeless than owner-households. Because renter-households tend to have lower incomes than homeowners, overpayment affects renter-households more seriously. In addition, overpayment by owners is considered less serious than overpayment by renters because they have more options than renters and are therefore less likely to become homeless. Homeowners generally are building equity, and have the option of selling the home and possibly obtaining less expensive housing, or refinancing to reduce mortgage payments.

The problems of overpayment are addressed through Program 1 (Section 8 Rental Assistance), Program 2 (Funding for Preservation and Rehabilitation of Affordable Housing), Program 6 (Section 202 Elderly or Handicapped Housing), Program 8 (Emergency, Transitional and Supportive Housing), Program 9 (Density Bonus), Program 11 (Affirmatively Furthering Fair Housing) and Program 13 (Adequate Sites) in the Housing Plan.

Table C-16: Cost Burden by Income Category – La Palma

	Households by Share of Income Spent on Housing Cost:		
Income	< 30%	30-50%	> 50%
< 30% HAMFI	140	85	400
30-50% HAMFI	157	225	200
50-80% HAMFI	360	304	105
80-100% HAMFI	560	144	40
> 100% HAMFI	2,014	164	15
Total Households	*3,231*	*922*	*760*

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

2.2.5 Special Needs Groups

Certain segments of the population may have a more difficult time finding decent, affordable housing due to their special circumstances or needs. These "special needs" households include the elderly, persons with disabilities, large households, female-headed households, farm workers and homeless persons.

Elderly

Federal housing data define a household type as "elderly family" if it consists of two persons with either or both age 62 or over. Of La Palma's 1,359 such households, 16.6% earn less than 30% of the area median income, or "AMI" compared to 24.2% in the SCAG region, and 35.3% earn less than 50% of AMI income compared to 30.9% in the SCAG region (**Table C-17**). The special needs of many households containing adults over the age of 65 result from their lower, fixed incomes, physical and development disabilities, or dependence needs.

Table C-17: Elderly Households by Income and Tenure – La Palma

		Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:	< 30% HAMFI	160	65	225	16.6%
	30-50% HAMFI	160	95	255	18.8%
	50-80% HAMFI	175	20	195	14.3%
	80-100% HAMFI	210	0	210	15.5%
	> 100% HAMFI	450	24	474	34.9%
	TOTAL	1,155	204	1,359	

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

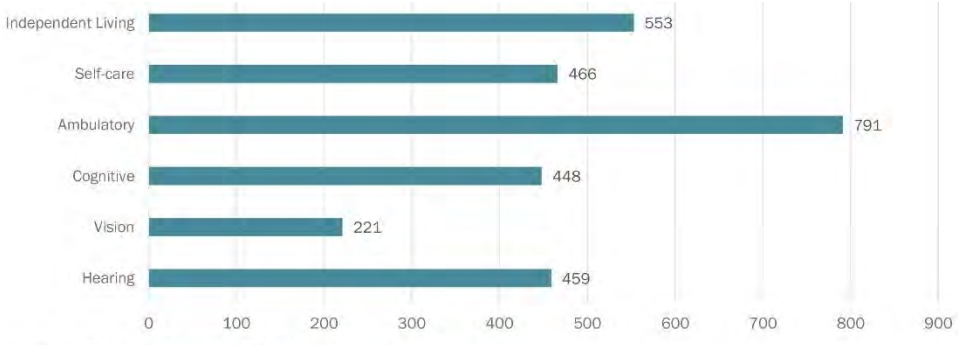
Elderly persons who live alone and those caring for their grandchildren may have special housing needs due to a need for assistance with finances and daily living activities. Furthermore, many senior citizens have fixed incomes and experience financial difficulty in coping with rising housing and living costs. This problem will grow in magnitude as the percentage of elderly residents continues to rise. Finally, as one might expect, most seniors are not in the labor force and earning an income, and may need help in meeting ongoing housing costs, especially utility and related costs, and often are forced to defer necessary repairs.

In addition to Section 8 rental assistance (Program 1), the Housing Plan includes programs for rehabilitation and preservation (Program 2), "reverse" mortgages (Program 5), Section 202 elderly housing (Program 6), and reasonable accommodation for persons with disabilities (Program 12). All of these City efforts benefit elderly persons.

Persons with Disabilities

Physical, mental, and developmental disabilities can hinder access to housing units of traditional design, and potentially limit the ability to earn adequate income. Disability data provides valuable context for assessing current and future need for accessible housing units. 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 accurate. In La Palma, the most commonly occurring disability was an ambulatory disability (**Table C-18**).

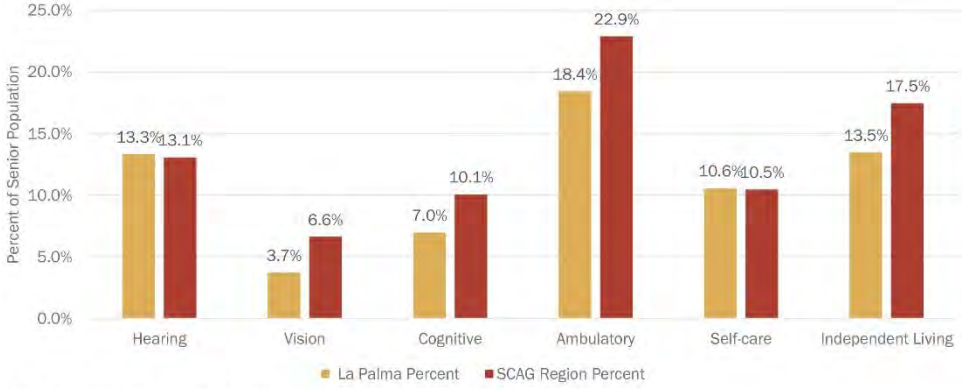
Table C-18: Disabilities by Type – La Palma



American Community Survey 2014-2018 5-year estimates.

Approximately 18.4% of La Palma's seniors reported an ambulatory disability compared to 22.9% of seniors in the SCAG region (**Table C-19**).

Table C-19: Disabilities by Type for Seniors 65+ – La Palma vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

The Housing Plan includes programs that address the needs of those with disabilities, including Section 202 elderly housing (Program 6), and providing reasonable accommodation for persons with disabilities (Program 12).

Developmental Disabilities

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

Many persons with developmental disabilities can live and work independently within a conventional housing environment while those with more severely disabilities require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled 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) 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 provides a local point of entry to services for people with developmental disabilities. The center 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.

Table C-20 provides recent developmental disability data for individuals in La Palma. A total of 228 persons were reported as having a developmental disability, with the largest number of those living with a relative or guardian.

Table C-20: Developmental Disabilities – La Palma

		La Palma
By Residence:	Home of Parent/Family/Guardian	87
	Independent/Supported Living	5
	Community Care Facility	0
	Intermediate Care Facility	5
	Foster/Family Home	0
	Other	0
By Age:	0 - 17 Years	97
	18+ Years	34
TOTAL		228

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.

A number of housing types are appropriate for people living with a development disability, including standard residential units, rent-subsidized homes, group living facilities, and licensed care facilities. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this need group. Incorporating "barrier-free" design in all new multi-family housing (as required by California and federal fair housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

To assist in the housing needs for persons with Developmental Disabilities, the Housing Plan includes Program 8 (Emergency, Transitional and Supportive Housing), Program 11 (Affirmatively Furthering Fair Housing) and Program 12 (Reasonable Accommodation).

Large Households

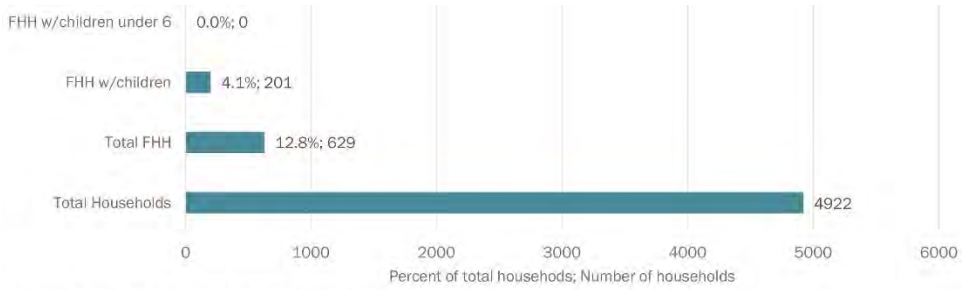
Large households are defined as those with five or more persons. Recent Census data (**Table C-7** on page C-8) reported that only about 2.1% of households in La Palma had five or more persons compared to 3.1% in the region as a whole.

To address this issue, the City will continue to work with the County of Orange to seek grant monies and Section 8 support to meet the needs of residents in large households. In addition, the Housing Plan includes several other programs that may serve large families, including housing rehabilitation and preservation of units at risk of converting to market-rate (Program 2), and the Adequate Sites Program (Program 13).

Female-Headed Households

Single-parent households require special consideration and assistance because of their increased need for affordable and accessible day care, health care, and other supportive services. Female-headed households with children in particular tend to have lower incomes than other types of households, which limits their housing options and access to supportive services. Recent Census data estimated that there were approximately 629 female-headed households in La Palma of which 201 had children (**Table C-21**).

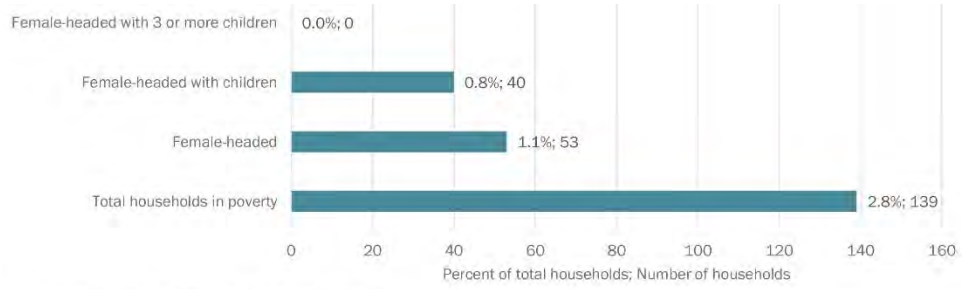
Table C-21: Female-Headed Households – La Palma



American Community Survey 2014-2018 5-year estimates.

Approximately 53 female headed households were living under the poverty line (**Table C-22**).

Table C-22: Poverty Status for Female-Headed Households – La Palma



American Community Survey 2014-2018 5-year estimates.

The Housing Plan includes several programs that may serve female-headed households, including Section 8 Rental Assistance (Program 1), housing rehabilitation and preservation of units at risk of converting to market-rate (Program 2).

Farm Workers

The City of La Palma does not have any areas or zones designated for agricultural uses. The City is built out, and undeveloped areas are designated for recreation or as open space. Consequently, the estimated 24 individuals identified as farm workers are likely to be employed outside of the City. The demand for housing generated by farm workers in the City is thus estimated to be extremely low.

Table C-23: Agricultural Employment – La Palma

Farmworkers by Occupation:

La Palma	Percent of total La Palma workers:	SCAG Total	
24	0.32%	57,741	Total jobs: Farming, fishing, and forestry occupations
24	0.47%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations

Employment in the Agricultural Industry:

La Palma	Percent of total La Palma workers:	SCAG Total	
54	0.71%	73,778	Total in agriculture, forestry, fishing, and hunting
44	0.86%	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.

Accessory dwelling units and multi-family apartments can provide housing options for employees working in these occupations.

Homeless

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 Point-in-Time Count and Survey of the Homeless reported 9 unsheltered homeless persons in La Palma.

Often, homelessness is a spiraling-down process; households facing employment or other crisis would move to successively less costly communities. 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 City's participation in 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.

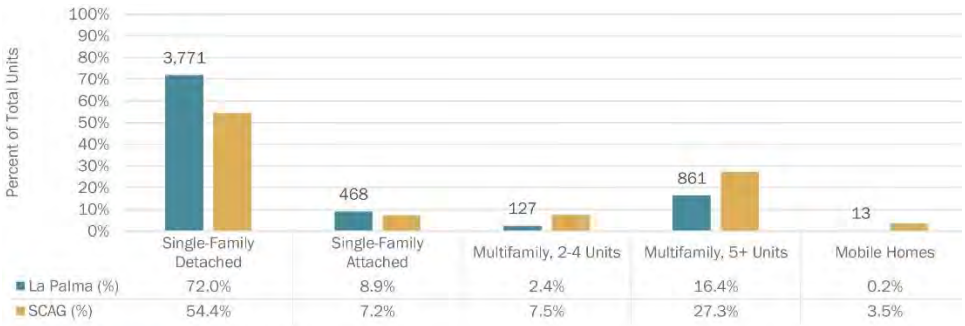
Funding for the Navigation Centers was secured through application and governmental meetings with state, regional, county and local officials resulting in the $12 million in State of California Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of these Navigation Centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing operation of the Navigation Centers. The La Palma Housing Successor Agency is funding the construction and ongoing operational costs for the City of La Palma. A Memorandum of Understanding was prepared and presented to the City Councils of all thirteen city governments for execution 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. Program 8 (Emergency, Transitional and Supportive Housing) identifies actions the City is taking to address homelessness.

2.3 Housing Stock Characteristics

2.3.1 Housing Type and Vacancy

The composition of La Palma's housing stock is identified in **Table C-24**. Single-family detached homes comprised 72% of the housing stock in La Palma compared to 54% for the region as a whole.

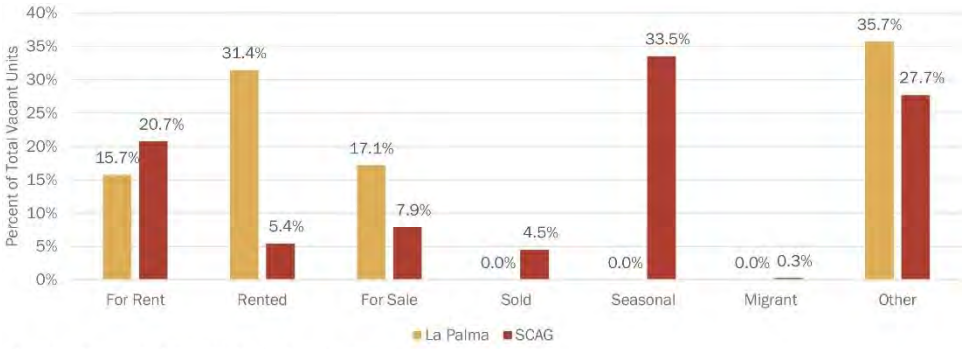
Table C-24: Housing by Type – La Palma vs. SCAG Region



CA DOF E-5 Population and Housing Unit Estimates

Recent Census estimates reported a 3.4% total vacancy rate in La Palma. The highest reported types of vacant units were "rented" and "other."

Table C-25: Vacant Units by Type – La Palma vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

2.3.2 Housing Tenure

Housing tenure (owner versus renter) is an important indicator of the housing market. Communities need an adequate supply of units available both for rent and for sale in order to accommodate a range of households with varying income, family size and composition, and lifestyle. **Table C-26** shows that more than two-thirds of all housing units in La Palma were owner-occupied compared to approximately 53% for the region as a whole.

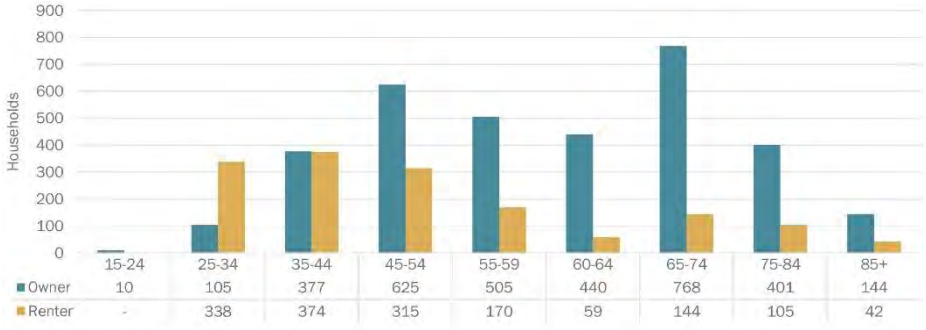
Table C-26: Housing Tenure – La Palma vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

As would be expected, persons under age 45 were more likely to be renters (**Table C-27**).

Table C-27: Housing Tenure by Age – La Palma vs. SCAG Region

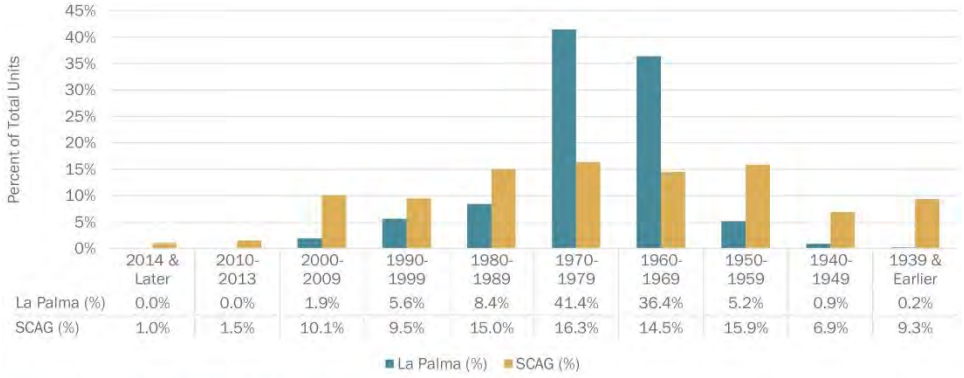


American Community Survey 2014-2018 5-year estimates.

2.3.3 Age and Condition of Housing Stock

The age of a community's housing stock can provide an indicator of overall housing conditions. Typically, housing over 30 years in age is likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work and other repairs. **Table C-28** displays the age of housing units in La Palma compared to the region as a whole. The majority of housing in La Palma was built in the 1960s and 1970s and is now more than 40 years old.

Table C-28: Age of Housing Stock – La Palma vs. SCAG Region



	2014 & Later	2010-2013	2000-2009	1990-1999	1980-1989	1970-1979	1960-1969	1950-1959	1940-1949	1939 & Earlier
La Palma (%)	0.0%	0.0%	1.9%	5.6%	8.4%	41.4%	36.4%	5.2%	0.9%	0.2%
SCAG (%)	1.0%	1.5%	10.1%	9.5%	15.0%	16.3%	14.5%	15.9%	6.9%	9.3%

American Community Survey 2014-2018 5-year estimates.

Most of the housing stock in La Palma remains in good condition. Very few housing units in the City are considered substandard, and the City actively addresses those through code enforcement. A 2021 windshield survey noted approximately 26 homes (approximately 0.5 percent) that appeared to need minor problems such as paint, roofing, windows and only 1 home with major problems; however, that was a result of recent fire damage. The City of La Palma's Code Enforcement staff works to ensure that the City's municipal code and property maintenance standards are met through both proactive code enforcement efforts and by responding to complaints received from the community. The goal of the Code Enforcement program is to ensure and maintain the high property values and standards and excellent quality of life enjoyed throughout our City.

The Code Enforcement Department tracks the number of open/active and closed cases each month, and ranks open cases by priority. On average, there are approximately four high priority cases each quarter of the year that remain open (out of approximately 35 cases that remain open). High priorities include public nuisances that could be detrimental to public health and welfare, as well as maintenance standards such as graffiti removal. Notices are sent to property owners, and where warranted, administrative citations are issued. Through the proactive and reactive efforts of the Code Enforcement Department, the housing stock in the City is routinely monitored and found to be in good condition.

Of the city's multi-family developments, the Nova La Palma apartment complex, at 7777 and 7799 Valley View Street, was rehabilitated in 1998 to upgrade the property and convert all the units to affordable housing. This complex remains in good condition. Other multi-family complexes in the City (Brookside, Suntree, Brentwood, Seasons, and the Camden Place Senior Apartments) require varying levels of rehabilitation.

2.3.5 Assisted Housing at Risk of Conversion

State law requires the City to identify, analyze, and propose programs to preserve lower-income multi-family housing units that could become unrestricted and possibly be lost as affordable housing (i.e., units at risk of conversion). **Table C-29** summarizes such affordable housing units and potential conversion risks in La Palma. None of these projects are at risk of conversion during the next 10 years.

Table C-29: Inventory of Assisted Housing Units in La Palma

Project/Address	Type	Form of Assistance	Total Units	Earliest Date of Subsidy Termination
Camden Place Senior Apartments 4500 Denni Street	Very low income senior apartments	Section 8 Assistance; Project Covenants; LIHTC; HUD; CalHFA	35 units	Section 8 vouchers are renewed yearly. Through the establishment of covenants that run with the land, the units must remain very low-income senior housing for 55 years, through 2052.
Casa La Palma 7799 Valley View Street	Low-income apartments	LIHTC	269	2052
Tapestry Walk La Palma Ave east of Denni Street	Low and moderate income townhomes	Project Covenants Set-Aside Funds	3 low 3 mod units	The units must remain affordable for 55 years from the Certificate of Occupancy. Moderate-income provisions will expire in 2067.

Source: City of La Palma; California Housing Partnership Corporation, 2021

2.4 Regional Housing Needs 2021-2029

The Regional Housing Needs Assessment (RHNA) is a key requirement for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for the 6th Housing Element cycle extending from July 2021 to October 2029. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

The RHNA for the 6th cycle was adopted by the Southern California Association of Governments (SCAG) in March 2021. The need for housing is determined by the forecasted growth in households as well as existing need due to overcrowding and overpayment. Each new household created by a child moving out of a parent's home or by a family moving to a community creates the need for a housing unit. The housing need for new households is then adjusted to maintain a desirable level of vacancy to promote housing choice and mobility. An adjustment is also made to account for units lost due to demolition, natural disaster, or conversion to non-housing uses. Total housing need is then distributed among four income categories on the basis of the county's income distribution, with adjustments to avoid an over-concentration of lower-income households in any community. More information about the RHNA process may be found on SCAG's website at https://scag.ca.gov/rhna.

The total assigned housing need for the City of La Palma during the 2021-2029 planning period is 802 units, which is distributed by income category as shown in **Table C-30**. Section 4 – Housing Resources and Opportunities includes a discussion of how the City will accommodate this need for additional housing during the planning period.

Table C-30: 2021-2029 Regional Housing Need – La Palma

Income Category	Number of Units
Very Low*	224
Low	140
Moderate	137
Above-Moderate	301
Total	802

*Per state law, half of the very-low units are assumed to be in the extremely-low income category
Source: SCAG 3/4/2021

It should be noted that SCAG did not identify growth needs for the extremely-low-income category in the adopted RHNA. As provided in Assembly Bill (AB) 2634 of 2006, the City has established the extremely-low-income need as one-half the need in the very-low category (112 units).

3. Housing Constraints

3.1 Market Constraints

Market, or non-governmental constraints, within the context of housing element legislation, consists of financing, land and construction costs. Usually, these factors are considered market conditions and may include the prices and rents charged in the marketplace.

3.1.1 Construction Cost

Construction cost is affected by the price of materials, labor, development standards and general market conditions. The City has no influence over materials and labor costs, and the building codes and development standards in La Palma are not substantially different than most other cities in Orange County. 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 and can exceed $150-200 per square foot depending on construction type.

3.1.2 Financing Cost and Availability

La Palma is typical of Southern California communities with regard to private sector home financing programs. At the current time (2021) mortgage interest rates are at historic lows, which reduces monthly mortgage costs for homeowners with good credit who are purchasing a home or refinancing.

Under State law, it is illegal for real estate lending institutions to discriminate against entire neighborhoods in lending practices because of the physical or socio-economic conditions in the area ("redlining"). There is no evidence of redlining being practiced in any area of the City.

3.1.3 Land Cost

Land represents one of the most significant components of the cost of new housing. Land values fluctuate with market conditions, and changes in land prices reflect the cyclical nature of the residential real estate market. Because there is virtually no vacant buildable land in La Palma new residential development must occur through redevelopment of underutilized properties; therefore, land cost depends on the existing uses, which increases development cost of demolition and site preparation. City land use regulations seek to mitigate high land cost through allowing high-density residential or mixed-use development at up to 48 units/acre or higher through the use of density bonus.

3.2 Infrastructure Constraints

Because the City has developed primarily within the last 40 years, infrastructure, including water, sewer, and sidewalks are readily available and adequate within the City limits. As discussed under Fees, the City

requires developers to provide on-site and off-site improvements necessary to serve their projects. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities and recreational facilities, consistent with the Subdivision Map Act.

Additionally, the City's Capital Improvement Program (CIP) contains a schedule of public improvements, including street/intersection improvements and other public works projects required to maintain or improve levels of service. The CIP helps to ensure that construction of public improvements is coordinated with private development. As a result of these policies, any infrastructure constraints which currently exist must be fully mitigated and financed as development or redevelopment occurs.

3.2.1 Wastewater

Sewage collection and treatment in La Palma is provided by the Orange County Sanitation District. In 2011-12, the City undertook an update to its sewage collection service master plan to identify maintenance needs and the schedule for providing routine maintenance funded by annual assessments and service costs. These are routine fees that are passed on to existing property owners. There are no known wastewater collection and treatment capacity problems that would preclude the level of development assigned to the City through the RHNA process.

3.2.2 Water Supply

Water service in La Palma is provided a combination pumped water from local groundwater basins and purchase of water from the Metropolitan Water District of Southern California through the Municipal Water District of Orange County (imported water from Northern California and the Colorado River). This blend of groundwater and imported water helps to ensure a consistent water supply to meet current and future needs within the City. Therefore, domestic water supply is not expected to limit development during the planning period. All new development is required to incorporate water-saving plumbing fixtures and landscape irrigation.

3.2.3 Storm Water Drainage

Three regional drainage channels run through the City of La Palma: Coyote Creek, Moody Creek, and Fullerton Creek. These channels are fully improved for flood control purposes. Flood control systems have been constructed to direct runoff away from developed areas and prevent flooding associated with heavy rains. The Orange County Flood Control District (OCFCD) is responsible for regional flood control facilities. The City manages local in-street facilities. The City works closely with OCFCD to determine needs for flood control improvements and to identify improvements needed to accommodate proposed development projects, if any. Because there is little vacant land in the City, the City's flood control system is not expected to be a limiting factor for development during the planning period.

3.2.4 Dry Utilities

Dry utilities such as electrical, telephone and cable are provided by private companies. All future development in La Palma will be infill where these

utilities are currently available; therefore, these utilities are not expected to limit development during the planning period.

3.3 Affirmatively Furthering Fair Housing

Under State law, "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."

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 two public meetings during the Housing Element update in an effort to include 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, including fair housing organizations. 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 (https://www.cityoflapalma.org/688/2021-2029-Housing-Element-Update) and provided 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 attend the meetings.

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 C-1**, the percentage of non-white population in the City is similar to most of the adjacent areas of Orange and Los Angeles counties. This map does not indicate any patterns of racial/ethnic concentration in the city.

Poverty. Recent Census estimates regarding poverty status of households in La Palma are shown in **Figure C-2**. As seen in this map, there are no concentrations of poverty, and the poverty rate is less than 10% for all census tracts in the city.

Persons with disabilities. The incidence of disabilities is relatively low in La Palma compared to some areas of Southern California. As shown in **Figure C-3**, the percentage of residents reporting a disability is less than 10% in the majority of the City, while the disability rate is 10% to 20% in the southern portion of the City.

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 C-4**), La Palma 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 children and adults, low concentration of poverty, and low levels of environmental pollutants, among others.

Contributing Factors

La Palma is a participating jurisdiction in the Orange County Analysis of Impediments to Fair Housing Choice ("AI"). Section IX of the 2020 AI[2] describes contributing factors to impediments to fair housing in Orange County and is incorporated herein by reference.

La Palma has a high Asian or Pacific Islander population at 46.78% of the population. White residents make up 26.43% of the population, Hispanic residents are 17.59%, Black residents are 5.27%, and Native Americans are 0.52%. The AI noted that La Palma was one of several Orange County jurisdictions that scored highly on educational opportunity across all racial categories. La Palma also has relatively high opportunity and little variation in scores between groups. While Economic Opportunity Index scores are generally lower in North Orange County than in South Orange County and along the coast, scores in La Palma are generally high.

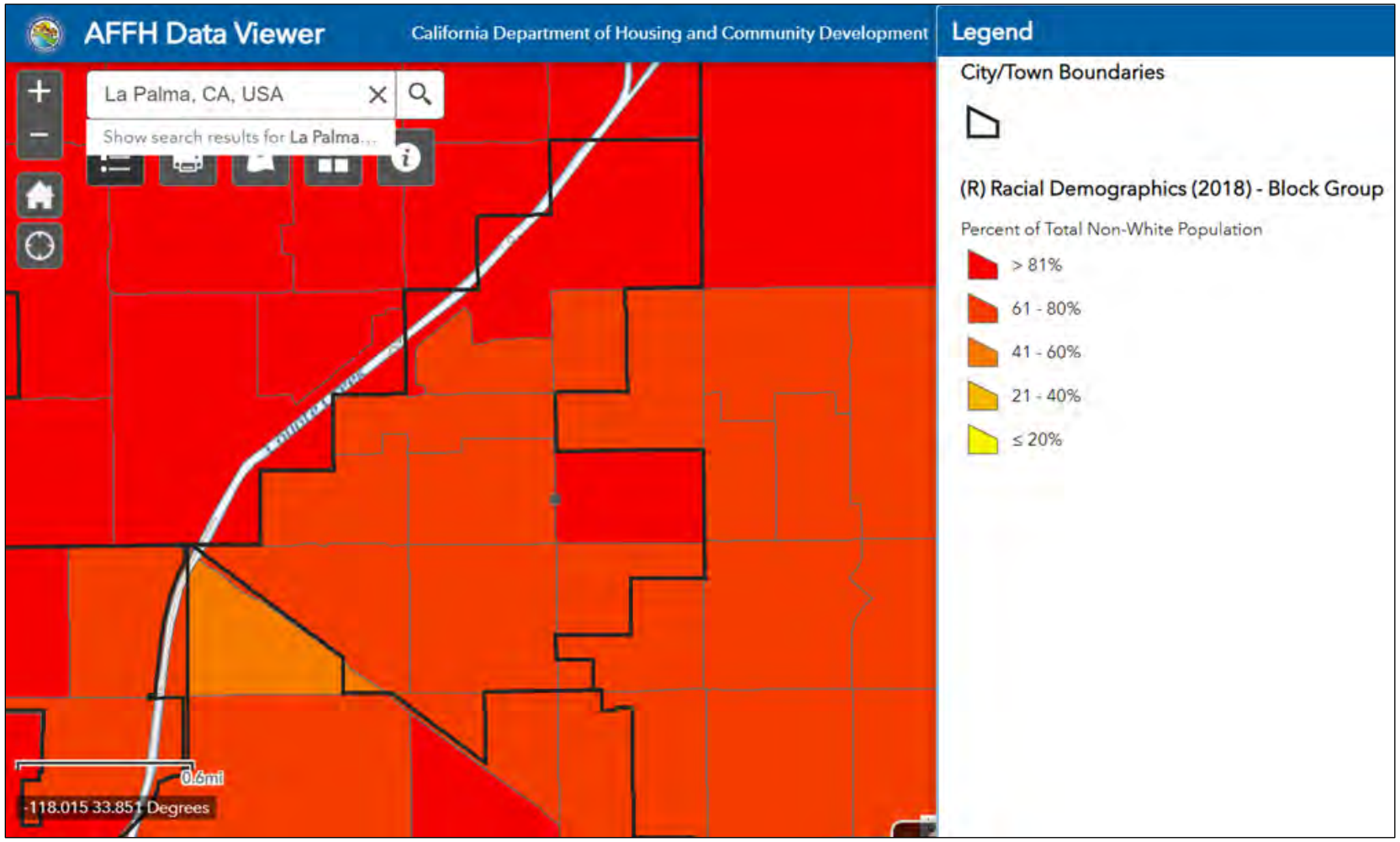
Conclusion

This analysis shows 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 La Palma. There is no evidence to suggest that discrimination against racial groups or persons with disabilities is a major issue.

The Housing Plan includes several programs to encourage and facilitate affordable housing development, as well as the provision of accessory dwelling units, which can expand affordable housing opportunities for lower-income persons such as caregivers, household employees, and others working in service occupations. Program 11 describes actions the City will take to affirmatively further fair housing and address any issues of housing discrimination that may arise.

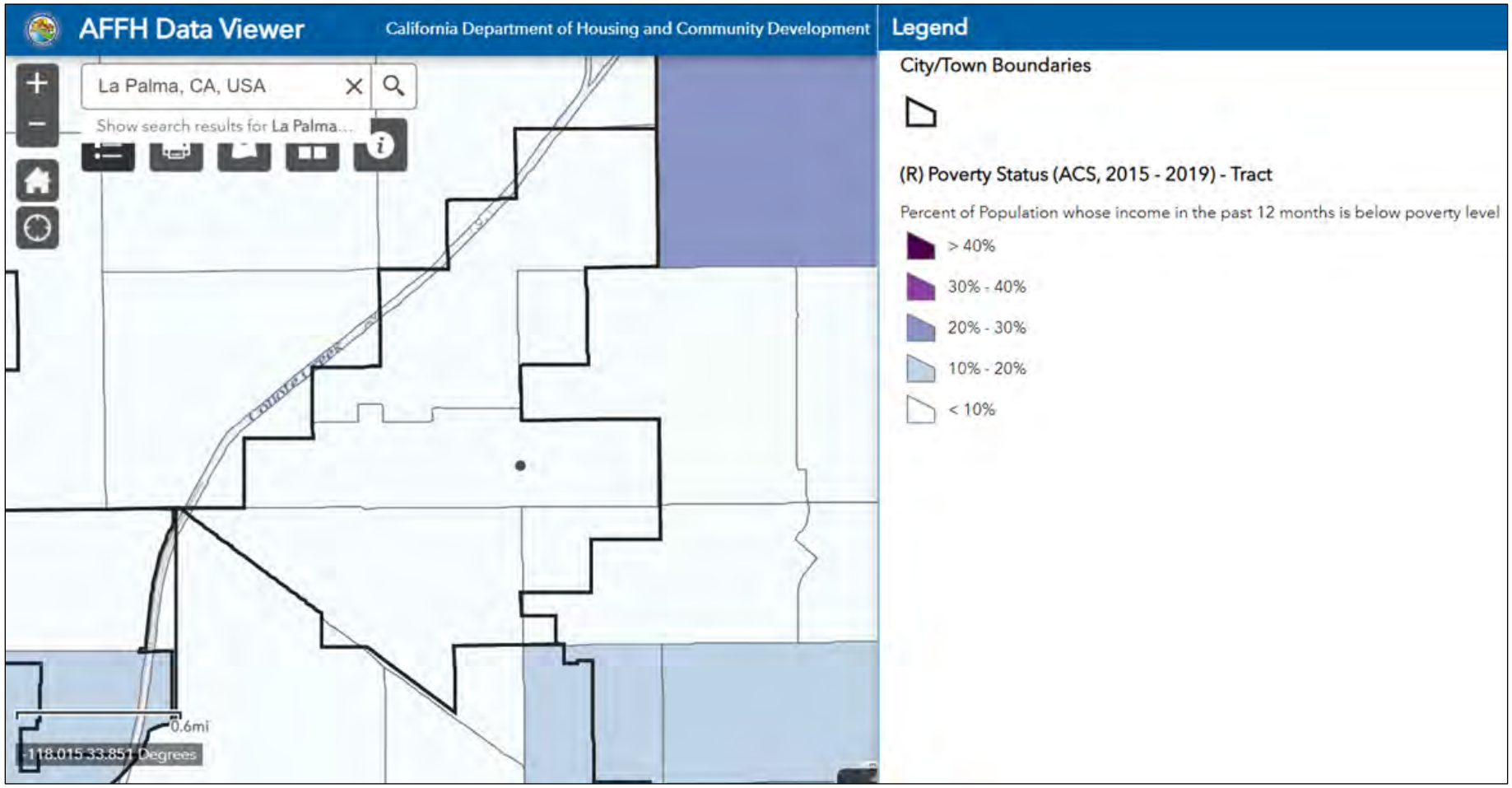
[2] https://www.ochcd.org/sites/hcd/files/import/data/files/115314.pdf

Figure C-1: Racial Characteristics – La Palma



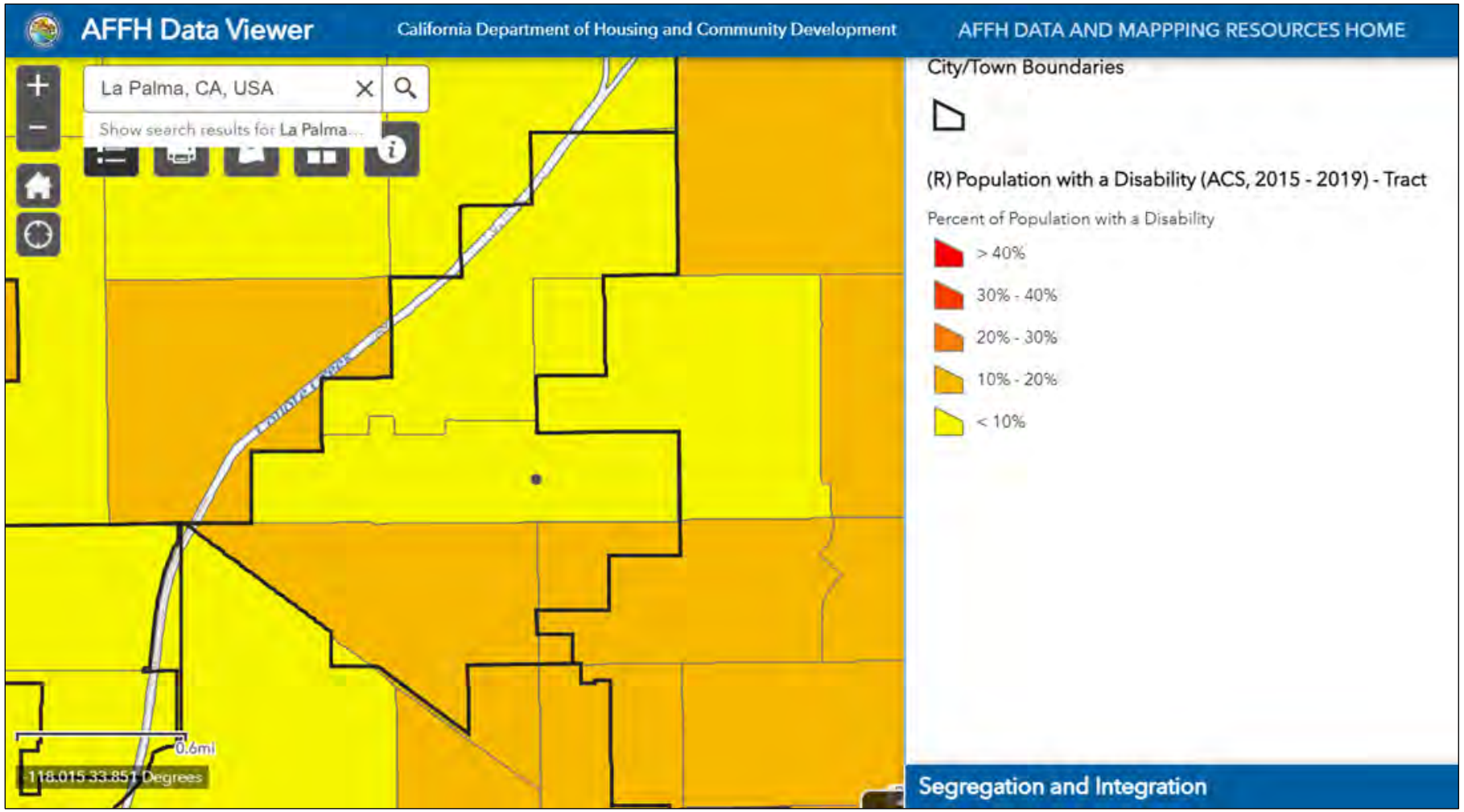
Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

Figure C-2: Poverty Status – La Palma



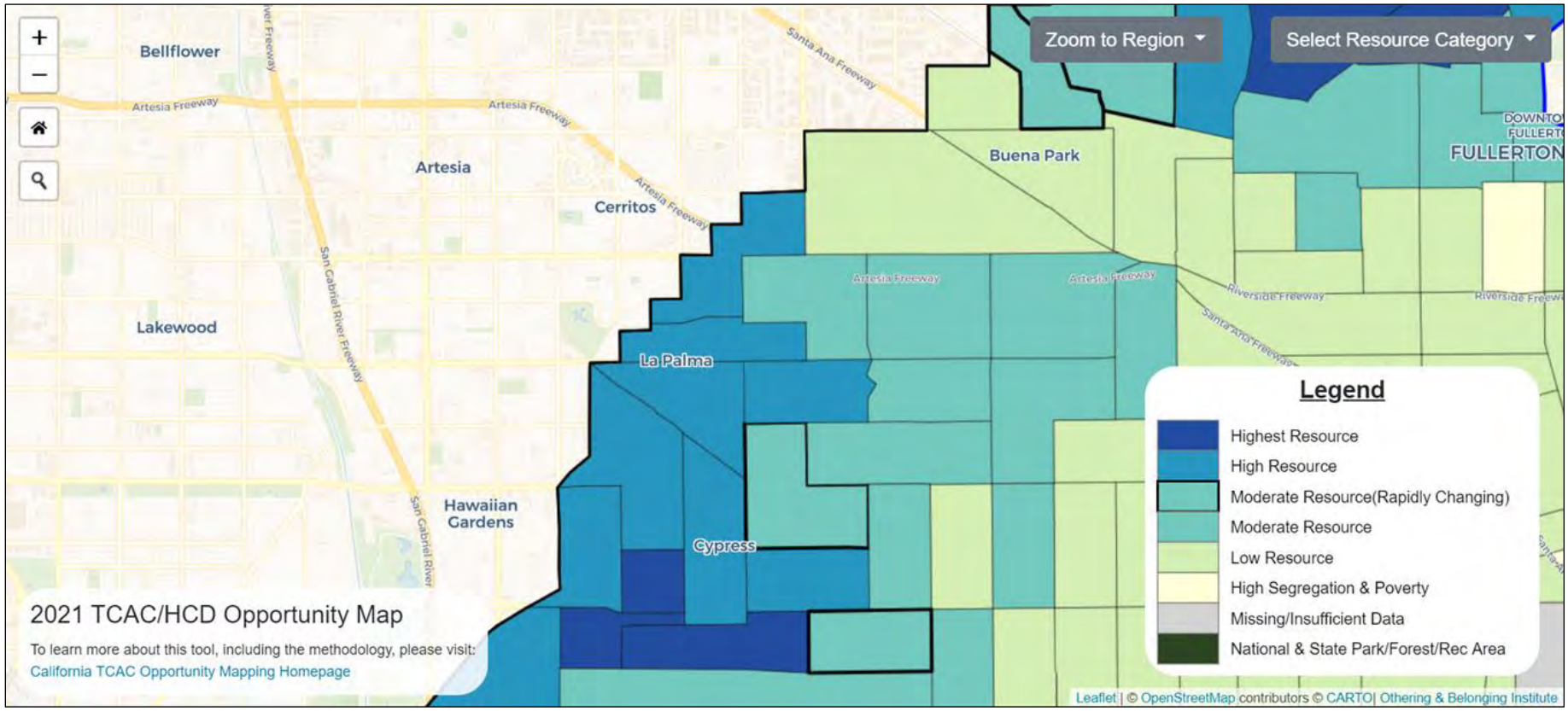
Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

Figure C-3: Population with a Disability – La Palma



Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

Figure C-4: TCAC/HCD Opportunity Map



3.4 Governmental Constraints

3.4.1 Land Use Controls

3.4.1.A Residential Zones

Single-family housing is the predominant existing land use in the City, comprising approximately half of its area. Multiple-family housing comprises approximately 8% of the community.

Land use controls, which govern the City's residential zones, are detailed in the Development Code (Chapter 44 of the Municipal Code) and shown in **Table C-31**: Development Code Requirements. These controls are typical of those governing residential development in a suburban community and do not unduly constrain residential development in the City. The General Plan and Development Code incorporate residential designations that respond to the needs of City residents.

Table C-31: Residential Development Standards

Category	Single Family Residential (R-1)	Multiple Family Residential (R-3)
Approvals	Precise Plan	Precise Plan
Residential Parking Requirement	2 off-street spaces within a garage	Up to 2-bdrms: 2 off street spaces + 1 guest space 3-bdrms: 3 off-street spaces + 1 guest space 4+ bedrooms: 4 off-street spaces + 1 guest space
Setbacks	Front: 15'; rear: 25'; side: 5'	Front: 20'; Rear: 15'; Side: 5' Exterior side yard of a corner lot 10'
Height Limits	2 stories or 30'	2 stories or 30'
Maximum Density	1 - 8.7 DU/net acre	10-25 DU/Net Acre depending on lot size
Minimum Lot Size	5,000 sf	10,000 sf
Gross Floor Area	1,500 sf for 3 bedroom 1,800 sf for 4 bedroom 2,100 sf for 5 bedroom	1,000 sf for 2 bedrooms + an additional 150 sf for each additional bedroom
Permitted Uses	Single family dwellings with 3+ bedrooms, attached dwellings	Single-family, duplex, triplex, fourplex, and multiple-family apartments and condominiums; Transitional housing; Churches

3.4.1.B Mixed Use Standards

In 2014 the General Plan was amended to expand opportunities for new mixed-use development in the northern portion of the city north of Orangethorpe Avenue (see additional discussion in Section 4.2). This mixed-use area is expected to create the most significant opportunities for new housing in La Palma during the 2021-2029 planning period.

The General Plan *Mixed Use Business* designation allows a residential density of 27 to 48 units per acre and a maximum floor area ratio (FAR) of 1.5, which applies only to the non-residential portion of a mixed-use project.

Development standards in the B-1 zoning district currently limit residential density to 27 units/acre and a height limit of 250 feet. Program 13 is included in the Housing Plan to review and amend zoning regulations for the B-1 district to ensure consistency with the General Plan.

3.4.1.C Parking Standards

The City's parking standards for residential developments are tailored to the vehicle ownership patterns associated with different residential uses. In La Palma, two parking spaces in a garage are required for each single-family residential unit unless an Accessory Dwelling Unit (ADU) is permitted in the garage. Parking standards for multi-family residential development is based on unit size. For up to two-bedroom units, two parking spaces are required plus one guest space (at least 66% of which must be covered; three-bedroom units must provide three spaces plus one guest space (at least 50% of parking must be covered), and four-bedroom or more units must provide four spaces plus one guest space (at least 40% of the parking must be covered). The required parking ratios are typical for Orange County and are not considered to be a constraint on the production of affordable housing. It is widely accepted that seniors and low-income households have fewer cars on average than higher-income households.

To encourage affordable and senior housing development, the City implements State density bonus law to allow reduced parking for qualifying multiple-family housing projects. The City is committed to working with affordable housing developers to create viable affordable housing projects and increase the diversity of housing options in La Palma.

3.4.1.D Park Dedication Requirements

The City's local park standard is four acres per 1,000 residents. However, 1.5 acres of this standard can be satisfied by cooperative arrangements between the City and local school districts. The remainder amount can be satisfied by either the dedication of land, payment of in-lieu fees, or a combination thereof. The effective local park standard of 2.5 acres per 1,000 residents is not in excess of the minimum State requirements, and therefore does not place an undue burden on the development of housing.

3.4.1.E Effects of Land Use Regulations on Housing Supply and Affordability

Under State law, for small metropolitan cities like La Palma with fewer than 25,000 residents, a density of 20 units per acre is considered adequate to facilitate development of lower-income housing.

The permitted density in the R-3 district is determined by parcel size, with higher density allowed on larger parcels, as follows:

Parcel Size	Maximum Density
2.0 acres or less	10 units/acre
2.1 – 4.0 acres	15 units/acre
4.1 acres or more	25 units/acre

In addition, the B-1 district allows a density of up to 27 units/acre, which is suitable for affordable housing.

3.4.2 Building Codes and Enforcement

The City of La Palma has adopted the current California Building Code, which establishes minimum construction standards as applied to all residential buildings. The City's building code is based on regulations necessary to protect the public health, safety and welfare, and the local enforcement of this code does not unduly constrain the development of housing.

The City has not adopted any amendments to the Building Code that would impact the availability and affordability of housing in the City. In addition, the City has avoided enacting excessively stringent requirements on building materials and construction methods that would hinder housing affordability and, where possible, plan reviews and approval processes have been expedited to reduce construction times. These efforts serve to lower overall development costs, thereby maintaining housing affordability.

The City maintains a code enforcement program as a means of maintaining the habitable condition of rental and owner-occupied units within the City. The City conducts sensitive enforcement of its residential codes by providing a minimum of three written notifications of code violations to property owners, allowing sufficient time for compliance and by providing information on available rehabilitation assistance to code violators.

3.4.3 Site Improvements

Since the City is completely built out and infrastructure is in place to service the entire City, site improvements are not a significant constraint to housing development. Because the City is surrounded by other jurisdictions in both Orange County and Los Angeles County to the west, a significant proportion of the traffic on its streets is the result of the regional traffic, which is outside the City's control. Therefore, the traffic and street improvement considerations are the result of, and in response to, this regional impact, and are not a constraint imposed by the City itself. Largely, traffic conditions in La Palma are good, with only the La Palma/Walker and Orangethorpe/Walker intersections experiencing significant congestion during peak travel periods.

3.4.4 Processing and Permit Procedures

Development projects to be undertaken in residential zones require submission of a Precise Plan. No separate conditional use permit is required for a residential development. The applicant must undertake the process outlined below when making a Precise Plan submission.

One key advantage in La Palma is that the City has no separate Planning Commission; the City Council serves as the land use entitlement authority, which reduces processing times.

3.4.4.A New Residential Developments

The approval procedure for a new residential development requires a Precise Plan Permit application to be processed by the City's Community Development Department. Within 30 days of receiving the application, staff assesses the application for completeness. If deemed complete, staff

completes the appropriate CEQA documentation and makes it available for public comment. Staff also notices the project for public hearing with the Development & Circulation Committee for design review. Typically, the CEQA process involves a Categorical Exemption, but in some cases a Negative Declaration, which must be available a minimum of 20 days for review. The public hearing must be noticed a minimum of 10 business days before the hearing date. If a recommendation for approval to the City Council is obtained from the Development & Circulation Committee, staff notices the project again, 10 business days before the City Council Hearing date. If the project is approved by the City Council, the applicant must sign an Agreement to Conditions of Approval within 15 days. Within five days of project approval, staff records the CEQA documents with the County Clerk-Recorder. The applicant can then submit to the Building Division for building permit plan check and building permit issuance.

3.4.4.B Precise Plan Requirements

The purpose of a Precise Plan is to provide a process for reviewing applications for new residential development. The precise plan application process allows for the review of the design of the development, an identification of potential impacts on the surrounding properties, and an assurance that the proposed project complies with the City of La Palma Municipal Code and General Plan. The applicant for a Precise Plan must submit an application form describing the manner in which the project complies with applicable requirements. Before submitting an application for a precise plan, the applicant or prospective developer is strongly encouraged to attend a pre-application conference with the Community Development Department to obtain information and guidance in preparing plans, surveys, and any other required application data.

Precise Plan approval requires that the following findings be made:

- The proposed use is allowed within the subject zoning district and complies with all applicable provisions of this Development Code.
- The proposed use would be consistent with the objectives, policies, general land uses, and programs of the general plan and any applicable specific plan.
- The approval of the precise plan or an amendment to precise plan for the proposed use is in compliance with the requirements of the California Environmental Quality Act (CEQA).
- The location, size, design, and operating characteristics of the proposed use would be compatible with existing land uses within the general area in which the proposed use is to be located.
- The subject site is physically suitable for the type and density/intensity of the use being proposed.
- The proposed project will have no adverse effect on abutting or adjacent properties and is compatible with those properties.

The conditions of approval that may be imposed on a project by the City as part of the permitting approval process are not unique or overly burdensome. Rather, they reflect a process employed on all projects requiring precise plan approval in the City. They are not so rigorous as to render infeasible projects of this type.

3.4.4.C Room Additions and Remodels

Room additions and remodels that are Development Code compliant are processed in an "over-the-counter" ministerial approval by planning staff. The applicant can then submit to the Building Division for building permit plan check and building permit issuance. Plan check review typically takes 7 to 10 days. The process is generally as follows:

1. Property owner or contractor contacts the City regarding constructing a room addition. The City sends application forms and encourages the applicant to meet with staff to review the project when it is in the earliest design stage so that staff can provide assistance with the code requirements, such as setbacks and height limits.
2. Applicant submits three sets of plans for in-house review. If the application conforms to standards, the applicant then submits a building permit application.

Fees for room additions vary from project to project based on their size and scope, but an applicant can anticipate paying at minimum a building plan check fee and a building permit fee. If a bedroom is a part of the scope of the project, then a sanitation fee applies and if the project exceeds 500 square feet, school fees also apply.

Only room additions and remodel projects that involve significant departure from City development standards and require a Variance go to the Development & Circulation Committee and City Council for Variance approval.

3.4.5 Fees

A schedule of the City's development fees is included in **Table C-32**. The City's fees are lower than in many other areas of Orange County. City fees are not an unreasonable constraint on the planning of this development, nor have they constrained or rendered infeasible any recent housing development in the City.

Table C-32: Schedule of Fees – 2021

Service	Fees
Conditional Use Permit	$1,000.00*
Conditional Use Permit Amendment	$800.00*
Precise Plan	$1,000.00*
Precise Plan Amendment (Residential)	$680.19*
Tentative Parcel Map	$700.00*
Tentative Tract Map	$700.00*
Final Parcel or Tract Map Check	$793.45
General Plan Amendment	$1,500.00*
Zone Change	$1,500.00*
Environmental Assessment	$544.09
EIR Review	Actual Cost +10%
Permit Issuance Fee – B&S	$26.18
Electrical – New Residential	$0.22/sq. ft. + service/sub panels
OC Sanitation District (based on unit type)	$4,973 (3-bedroom single-family) $3,482 (2-bedroom multi-family)
School district	$4.08/sq. ft.
Park in-lieu fee	$21,900 per gross acre (multiple-family) $25,200 per gross acre (non-residential)
Water connection and meter	$51.03 + $2.28/fixture + PW fee for meter
Mechanical Permit (heat/cool)	$96.41
Plumbing Permits (cumulative)	$51.03 + $2.28/fixture)

*Minimum Mandatory Fee Plus Direct Labor Cost (DLC)

The only City impact fee in La Palma is a Quimby Act park-in-lieu fee. Typical development fees will include fees paid to Public Works (such as grading permits, encroachment permits), sanitation fees, Building Division fees (e.g., demolition permits, plan checks, mechanical, plumbing, electrical permits), Orange County Fire Authority fees, and City Business License fees. Development fees charged by other entities are as follows:

- Orange County Sanitation District - $4,973 (3-bedroom single-family) / $3,482 (2-bedroom multi-family)
- School fees - $4.08 per square foot

3.4.6 Multi-Family Precise Plan Requirements (Density Bonus Ordinance)

The Precise Plan process ensures that all multi-family residential developments comply with the development standards of the Multi-Family Residential Zone (R-3) per Chapter 44 of the City of La Palma Municipal Code. The Precise Plan process and these development standards may be minor constraints on affordable housing projects. For example, the Precise Plan process has the potential to prolong the timeline of an affordable housing project or the development standards may impact the financial feasibility of a project by limiting the number and sizes of housing units in a development.

To mitigate these potential constraints from the development standards and Multi-Family Residential Precise Plan requirements, the City has incorporated an Affordable Housing Section into the Municipal Code

(Chapter 44, Sections 44-203 to 44-305). This section provides incentives for the development of affordable housing to qualifying households and residents. The incentives include a density bonus and other incentives, such as a reduction in development standards. The density bonus provisions of the Affordable Housing Section comply with the current requirements of Government Code Section 69915. These provisions help to minimize the governmental and financial constraints of the Multi-Family Residential Precise Plan process to affordable housing projects. In addition, Program 13 in the Housing Plan includes a review of Precise Plan review procedures to ensure that they do not pose an unreasonable constraint to housing production.

3.4.7 Environmental Review

Environmental review is required for all development projects under the California Environmental Quality Act (CEQA). An Environmental Impact Report (EIR) is required of all developments that have the potential of creating significant impacts that cannot be mitigated to a level that is less than significant. Most infill residential projects in La Palma are either Categorically Exempt or require only an Initial Study and Negative Declaration. The Negative Declaration process typically takes two to three weeks to prepare, plus the mandated public review period. Categorically Exempt developments require a minimal amount of time. As a result, the City has no ability to reduce constraints caused by the State-mandated environmental review process.

3.4.8 Mobile Homes/Manufactured Housing

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

In La Palma, manufactured housing and mobile home parks are conditionally allowed the R-3, multiple family zone. Permanently sited manufactured homes on lots zoned for single-family dwellings are subject to the same rules as site-built homes, consistent with state law. The City of La Palma currently has no mobile home parks.

3.4.9 Accessory Dwelling Units

Accessory dwelling units (ADUs) can be an important source of affordable housing for lower-income persons and households. ADUs are reviewed and approved ministerially (i.e., without a conditional use permit or other discretionary action) by the City Planner. Plans are required showing the lot dimensions, streets, utilities, drainage plan, building placement, access, parking areas, roof pitch, fencing, landscaping, exterior elevations, and material of all buildings. In recent years, the State Legislature has adopted extensive changes to ADU law in order to encourage housing production. Among the most significant changes is the requirement for cities to allow one ADU plus one “junior ADU” on single-family residential lots by-right subject to limited development standards. Program 10 in the

Housing Action Plan includes a commitment to continue to monitor changes to State housing law and amend City regulations as necessary.

3.4.10 Special Needs Housing

Persons with special needs include those in residential care facilities, persons with disabilities, the elderly, farm workers, persons needing emergency shelter or transitional living arrangements, and single room occupancy units. The City's provisions for these housing types are discussed below.

3.4.10.A Residential Care Facilities

Residential care facilities refer to any family home, group home, or rehabilitation facility that provides non-medical care to persons in need of personal services, protection, supervision, assistance, guidance, or training essential for daily living. In accordance with state law, small family care homes that serve six or fewer persons are permitted by-right in all residential districts. The Development Code explicitly permits small family care homes within the R-1 and R-3 zones, and conditionally permits congregate care facilities in the R-3 zone. In addition, convalescent homes are conditionally permitted within the OP and PI zones. These requirements are consistent with state law and do not pose a significant constraint on the establishment of such facilities.

The Development Code requires congregate care facilities in the R-3 zone that have seven or more residents to obtain a Conditional Use Permit (CUP) prior to operation. A CUP is necessary to properly analyze the impact of the intensity of the use on the surrounding residential properties because of the larger scale of these facilities. Typical conditions of approval for a large group home would include compliance with Building Codes and conditions specified by the County of Orange Health Care Agency and the Orange County Fire Authority. The City would also evaluate potential noise and parking impacts and condition the project to mitigate any adverse impacts to surrounding residential properties. The City's Reasonable Accommodation Ordinance may also be utilized to request exceptions to existing regulations for large care facilities in the R-3 zone.

3.4.10.B Housing for Persons with Disabilities

The City's building code requires that new residential construction comply with Title 24 accessibility standards. These standards include requirements for a minimum percentage of fully accessible units in new multi-family developments. The provision of fully accessible units may increase the overall project development costs. However, enforcement of accessibility requirements is not at the discretion of the City, but is mandated under state law.

With regard to the definition of "family", the Development Code contains the following definition, which complies with state law.

(1) Two or more persons related by birth, marriage, or adoption [U.S. Bureau of the Census].
(2) An individual or a group of persons living together who constitute a bona fide single-family housekeeping unit in a dwelling unit, not

including a fraternity, sorority, club, or other group of persons occupying a hotel, lodging house or institution of any kind.

With regard to concentration requirements, there are no restrictions regarding separation or concentration for group homes or other facilities for persons with disabilities.

With regard to parking standards, to facilitate the processing of requests to reduce architectural obstacles for persons with disabilities, the City established a process for review of requests for reasonable accommodation pursuant to SB 520 of 2001, expediting requests and providing information to applicants. Requested modifications to parking requirements for persons with disabilities are considered under the City's Reasonable Accommodation procedures (see Program 13 in the Housing Plan).

3.4.10.C Farm Worker Housing

The City of La Palma does not have agricultural areas and has no need for permanent farm worker housing. As noted in Section 2.2.5 recent Census estimates reported between 24 and 54 total workers in La Palma in the agricultural industry and from 31,000 to 73,000 in the entire SCAG region. The City's overall efforts to provide and maintain affordable housing opportunities will help to support the few seasonal farm workers who may reside in the City. In addition, Program 8 is included in the Housing Plan to ensure that City regulations are consistent with State law related to agricultural employee housing.

3.4.10.D Housing for the Elderly

Senior group housing and senior citizen hotels are conditionally permitted uses in the PI zone. In addition, multiple-family housing in the R-3 zone can accommodate senior apartments or condominiums. The Development Code also provides a density bonus for the construction of senior housing (Section 44-305, et seq.). The Development Code is not considered a constraint to the development of senior housing because the regulations are the same as for other residential uses in the same districts.

3.4.10.E Emergency Shelters and Low Barrier Navigation Centers

Emergency shelters are facilities that provide a safe alternative to the streets either in a shelter facility, or through the use of motel vouchers. Emergency shelter is short-term, usually for 30 days or less. Emergency shelters are permitted by-right (i.e., non-discretionary) in the General Industrial District subject to a written agreement between the shelter operator and the City incorporating the following standards:

- A maximum ten beds or persons to be served per night, or a combination of multiple shelters with a combined capacity not to exceed ten beds or persons per night.
- The emergency shelter shall operate on a first-come, first-served basis with clients only permitted on site and admitted to the shelter between 6:00 p.m. and 8:00 a.m. during Pacific Daylight Time, and 5:00 p.m. and 8:00 a.m. during Pacific Standard Time. Clients must vacate the emergency shelter by 8:00 a.m. and have no guaranteed bed for the next night.

- The maximum stay of a given person at the emergency shelter shall not exceed a total of 180 days (cumulative, even if not consecutive) within a 365-day period.
- In no event shall an emergency shelter be established within 300 feet of an existing emergency shelter, as measured from the property line.
- Exterior lighting shall be provided for the entire outdoor and parking area of the emergency shelter property per subsections 26-101(6) and 44-362(e).
- An on-site waiting area shall be provided and clearly identified for all clients. The on-site waiting area shall be no larger than ten square feet for every one bed provided at the emergency shelter. Said waiting area shall be in a location that is not adjacent to the public right-of-way. The client intake area shall be located directly adjacent to the on-site waiting area.
- All emergency shelter improvements shall comply with this chapter, and the most current adopted building and safety code, specific to the establishment of dormitories.
- A security and safety plan shall be provided to the City for review and approval in conjunction with any application for a business license for an emergency shelter. The plan may be required to address additional security and safety needs as identified by the City Manager or his or her designee. The approved security and safety plan shall remain active throughout the life of the emergency shelter. The plan shall contain, at minimum, provisions addressing the following topical areas:
  a. The separation of male/female sleeping areas, as well as any family areas within the shelter.
  b. Specific off-site controls to minimize the congregation of clients in the vicinity of the shelter and in adjacent neighborhoods during hours that clients are not allowed on site.
  c. A system for daily admittance and discharge procedures and monitoring of waiting areas, with the goal of minimizing disruption to nearby land uses.
  d. How the operator will control and regulate alcohol and illegal drug use by clients on the premises.
  e. The emergency shelter operators shall provide the City with the most current daytime office business hour contact information for the operator of the shelter, as well as the nighttime contact information for the "persons on duty" when the emergency shelter is open to clients.
  f. A plan for the emergency shelter to maintain good communication and response to operational issues which may arise from whatever source.
  g. The operators shall ensure proper compliance with all applicable federal, State and local laws pertaining to client residency and occupancy.
- At least one manager shall be on site during all hours of operation of the emergency shelter. Such manager must be an individual who does not utilize the shelter's beds or other services and who resides off site. The manager must be accompanied by one supporting staff member for every five beds, or fraction thereof, in the facility. Such staff members must be individuals who do not utilize the shelter's beds or other services and who reside off site.
- The emergency shelter shall provide off-street parking at the ratio of one space per five beds and/or one-half spaces per bedroom designed as a family unit with children, plus one space per

employee or volunteer staff member on duty. Alternatively, the emergency shelter may submit a parking study, subject to approval by the City, demonstrating that the parking demand associated with the emergency shelter justifies requiring a reduced amount of off-street parking. Each shelter shall also provide a bike rack in a secured area on the premises.

- Public health and safety requirements.
  a. Health permit. An emergency shelter operating without any food services shall be required to comply with applicable Orange County Health Care Agency standards and regulations and secure any necessary permits prior to issuance of a certificate of occupancy and a business license. Any emergency shelter that contains a kitchen, but that does not provide food services, shall comply with all applicable Orange County Health Department standards and regulations; however, such kitchen shall not be remodeled into a commercial kitchen.
  b. Fire and safety. Sleeping sections or rooms shall be equipped with a smoke detector, a hand-held fire extinguisher, and an evacuation plan, subject to review by the Orange County Fire Authority (OCFA). The City may require the installation of a sprinkler system or other appropriate safety measures if recommended by the OCFA.
  c. Sanitation. The emergency shelter shall provide a minimum of one toilet and one shower per gender for every five beds, and a minimum of one private shower and toilet facility for each area designated for use by individual families.

As discussed previously in Section 2.2.5, the most recent Point-in-Time homelessness survey reported 9 unsheltered persons in La Palma. The General Industrial district encompasses approximately 40 acres and includes parcels with existing buildings that could be converted for use as shelters to accommodate the need for 9 shelter beds.

AB 139 (2019) revised State law regarding parking standards for emergency shelters. Program 2 in the Housing Plan is included to address this requirement.

In 2019 the State Legislature adopted AB 101 establishing requirements related to local regulation of low barrier navigation centers, which are defined as "Housing first, low-barrier, service-enriched shelters 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:

(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) Accommodation of residents' 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

Low barrier navigation centers meeting specified standards must be allowed by-right in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. Program 8 in the Housing Plan includes a

commitment to process an amendment to the Development Code to allow low barrier navigation centers in compliance with this requirement.

3.4.10.F Transitional and Supportive Housing

Transitional housing is intended for homeless persons or those at-risk of homelessness and requires that the resident participate in a structured program to work toward the established goals so that they can move on to permanent housing. Occupancy is typically from 6 months to 2 years.

Supportive housing is intended for persons with special needs who are at risk of homelessness and typically includes supportive services on-site such as counseling and job placement services. There is typically no limit on the length of stay.

State law requires that transitional and supportive housing be considered a residential use that is subject only to the same requirements and procedures as other residential uses of the same type in the same zone. In 2018 AB 2162 amended State law to require that supportive housing be allowed by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria. Program 8 in the Housing Plan includes a commitment to process an amendment to the Development Code in compliance with this requirement.

3.4.10.G Single Room Occupancy

Single room occupancy (SRO) facilities are small studio-type units and are allowed in the B1, GI and PI zones subject to a Conditional Use Permit. Development standards for these uses are no more restrictive than for other uses allowed within these zones. There are no minimum size restrictions for SROs.

The CUP process for the development of a SRO facility would entail a staff review and analysis of a CUP application, which would include a CEQA review and a water quality review. The project would be noticed for hearing before the City Council. The time frame for a CUP application is tied to the Permit Streamlining Act, CEQA, and Public Hearing Notification requirements. When an application is deemed complete, then staff would schedule the appropriate hearings as quickly as possible. Typical timeframe is approximately 90 days to get to Public Hearing before the City Council after an application has been deemed complete. Typical conditions of approval would include construction impacts (dust, erosion control, etc.), lighting, drainage, landscaping, parking, refuse storage, utility easements and connections, occupancy limits, on-site management and operational characteristics, equipment screening and noise control.

4. Housing Resources and Opportunities

4.1 Regional Housing Needs 2021-2029

In accordance with Government Code §65584, future housing needs for each city and county in the Southern California region are prepared by the Southern California Association of Governments (SCAG) under a process known as the Regional Housing Needs Assessment (RHNA). SCAG's Regional Council adopted the final RHNA Plan for the 2021-2029 planning period in March 2021.

The total housing needed in each jurisdiction is distributed by income category (very-low-, low-, moderate-, and above-moderate income). The RHNA allocation for La Palma is also discussed in Appendix C, Section 2 – Housing Needs Assessment.

4.2 Inventory of Sites for Housing Development

Section 65583(a)(3) of the Government Code requires Housing Elements to contain 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."

Methodology for the Sites Inventory Analysis

La Palma is completely developed; therefore, the most significant opportunities for new housing development are within the *B-1 Mixed Use Business* zoning district in the northern portion of the city. The General Plan designation for this area allows mixed-use development at a density of 27 to 48 units/acre. The "default density" for lower-income housing established in State law for small metropolitan cities such as La Palma is 20 dwelling units per acre; therefore, sites in the B-1 zone are suitable for housing at all income levels.

Because there is currently no housing within the B-1 zone, all of these properties represent a substantial opportunity for new housing with no displacement of existing residents. A floor area ratio (FAR) of 1.5 is allowed in this area, which applies to only the non-residential portion of a mixed-use development. As shown in Table C-34, most properties are developed at an FAR less than 0.5 and therefore are significantly under-developed. City staff has also been contacted recently by property owners in this area who have expressed interest in residential and mixed-use development. This area is also located near employment opportunities and public transit. The location of the B-1 zone is shown in **Figure C-5**.

In addition to the B-1 zone, potential accessory dwelling units (ADUs) can satisfy a portion of RHNA requirements as described below.

Potential sites for residential development during the 2021-2029 planning period are summarized in **Table C-33**. As shown in this table, adequate capacity is available to accommodate the City's RHNA allocation in all income categories. **Table C-34** provides an inventory of parcels in the B-1 zone, while Error! Reference source not found. shows the estimated capacity for future ADUs during the 8-year planning period.

Table C-33: Residential Sites Summary

Site Category	Income Category				
	VL	Low	Mod	Above Mod	Total
Underutilized sites (Table C-34)	224	224	449	1,347	2,244
Potential ADUs (Table C-35)	6	10	7	1	24
Total sites inventory	230	234	456	1,348	2,268
RHNA 2021-2029	224	140	137	301	802
Adequate Sites?	Yes	Yes	Yes	Yes	Yes

Source: City of La Palma, 2021

Accessory dwelling units (ADUs) represent a significant opportunity for affordable housing, particularly for single persons or small households including the elderly, college students, young adults, and caregivers. Recent changes in State law have made the construction of ADUs more feasible for homeowners, and the City has seen an increase in homeowner interest in ADUs recently.

Based on the level public inquiries, it is estimated that approximately three ADUs per year will be built during the 2021-2029 planning period. Based on recent analysis conducted by SCAG[3] approximately 98% of future ADUs are expected to be affordable to low- and moderate-income households.

While this analysis demonstrates the availability of adequate sites to accommodate the City's RHNA allocation, adequate incentives and subsidies will need to be provided to ensure that housing units can be built within the appropriate income categories. Programs 9 and 13 in the Housing Plan describe actions the City can take to encourage housing development commensurate with the City's RHNA allocation for this planning period.

A discussion of public facilities and infrastructure needed to serve future development is contained in Section 2 of this Appendix, under Infrastructure Constraints. There are currently no known environmental or public facility service limitations that would preclude the level of development described in the RHNA, although developers will be required to pay fees or construct public improvements prior to or concurrent with development.

3 SCAG, Regional Accessory Dwelling Unit Affordability Analysis, 2020 (https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527)

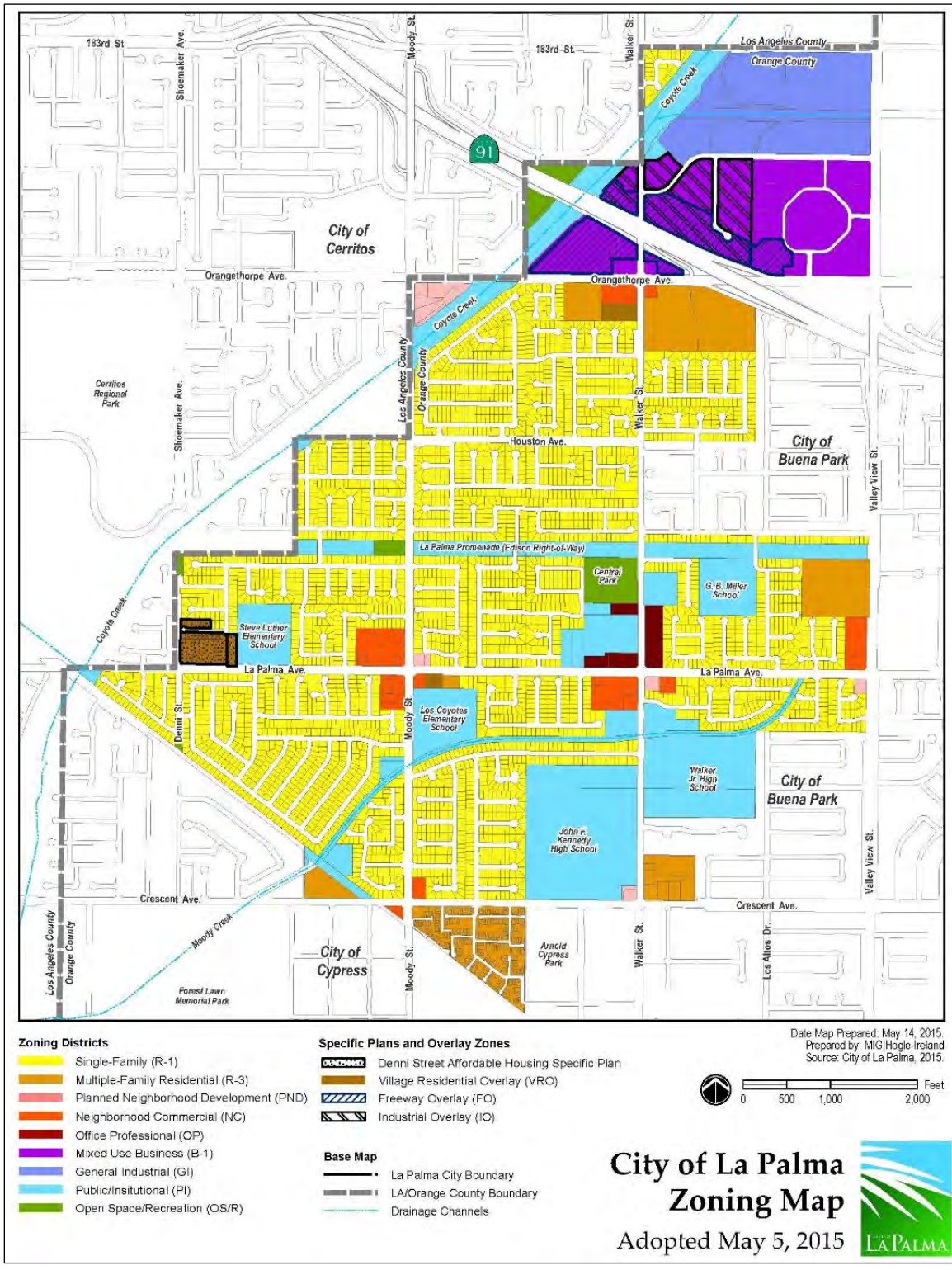
Table C-34: Residential Land Inventory vs. RHNA

Address	APN	Lot Size (Sq.Ft.)	Zone	General Plan	Existing Land Use	Bldg. Sq. Ft.	FAR	VL	Low	Mod	Above Mod	Total
5355 Orangethorpe Ave	276-072-12	406,416	B-1/FO	MUB/FO	Professional Office	154,219	0.38	25	25	50	151	252
5355 Orangethorpe Ave	276-072-05	3,185	B-1/FO	MUB/FO	Parking Lot	0	0.00	0	0	0	1	2
5355 Orangethorpe Ave	276-072-13	35,076	B-1/FO	MUB/FO	Parking Lot	0	0.00	2	2	4	13	22
5471 Orangethorpe Ave	276-072-16	47,184	B-1	MUB	Bank	4,684	0.10	3	3	6	18	29
6901 Walker Street	276-072-08	51,365	B-1/FO	MUB/FO	Restaurant	9,700	0.19	3	3	6	19	32
6902 Walker Street	276-072-15	19,622	B-1/FO	MUB/FO	Restaurant	9,700	0.49	1	1	2	7	12
6940 Walker Street	276-073-02	11,155	B-1/FO	MUB/FO	Vet Clinic	3,807	0.34	1	1	1	4	7
5501 Orangethorpe Ave	276-073-03	22,778	B-1	MUB	Liquor Store & Restaurant	5,694	0.25	1	1	3	8	14
5545 Orangethorpe Ave	276-073-04	26,895	B-1/FO	MUB/FO	Restaurant & Electronic Billboard	3,006	0.11	2	2	3	10	17
5551 Orangethorpe Ave	276-073-05	7,377	B-1/FO	MUB/FO	Office	1,224	0.17	0	0	1	3	5
6951 Walker Street	276-071-11	43,248	B-1/FO/IO	MUB/FO	Industrial & Ancillary Office	14,912	0.34	3	3	5	16	27
6861 Walker Street	276-071-14	51,712	B-1/FO/IO	MUB/FO	Warehouse & Ancillary Office	29,831	0.58	3	3	6	19	32
6811 Walker Street	276-071-09	58,213	B1/IO	MUB	Warehouse & Ancillary Office	27,008	0.46	4	4	7	22	36
6842 Walker Street	276-081-01	292,449	B-1/FO/IO	MUB/FO	Warehouse & Ancillary Office	150,000	0.51	18	18	36	109	181
6841 Marlin Circle	276-081-12	108,442	B1/IO	MUB	Industrial & Ancillary Office	52,500	0.48	7	7	13	40	67
5600 Fresca Drive	276-081-13	88,233	B1/IO	MUB	Warehouse & Ancillary Office	40,500	0.46	5	5	11	33	55
5555 Fresca Drive	276-051-35	121,993	B1/IO	MUB	Training Facility	23,600	0.19	8	8	15	45	76
5692 Fresca Drive	276-081-03	191,322	B1/IO	MUB	Industrial & Ancillary Office	100,100	0.52	12	12	24	71	119
6892 Marlin Circle	276-081-09	125,436	B1/IO	MUB	Industrial & Ancillary Office	125,436	1.00	8	8	16	47	78
6911 Marlin Circle	276-081-22	68,425	B-1/FO/IO	MUB/FO	Warehouse & Ancillary Office	57,266	0.84	4	4	8	25	42
6907 Marlin Circle	276-081-66	59,756	B-1/FO/IO	MUB/FO	Industrial & Ancillary Office & Billboard	25,116	0.42	4	4	7	22	37
6907 Marlin Circle	276-081-65	2,478	B-1/FO/IO	MUB/FO	Cell Tower & Backup Generator	0	0.00	0	0	0	1	2
1 Centerpointe Dr	276-081-48	178,955	B-1	MUB	Office	89,323	0.50	11	11	22	67	111
2 Centerpointe Dr	276-081-46	41,648	B-1	MUB	Restaurant	7,030	0.17	3	3	5	15	26
3 Centerpointe Dr	276-081-50	101,139	B-1	MUB	Hotel	81,253	0.80	6	6	13	38	63
4 Centerpointe Dr	276-081-61	105,998	B-1	MUB	Office	84,600	0.80	7	7	13	39	66
5 Centerpointe Dr	276-081-49	124,232	B-1	MUB	Office	63,654	0.51	8	8	15	46	77
6 Centerpointe Dr	276-081-62	127,153	B-1	MUB	Office	151,355	1.19	8	8	16	47	79
8 Centerpointe Dr	276-081-62	127,153	B-1	MUB	Parking Structure	165,135	1.30	8	8	16	47	79
10 Centerpointe Dr	276-081-64	45,620	B-1	MUB	Office, Retail, Restaurant	12,491	0.27	3	3	6	17	28
14-16 Centerpointe Dr	276-081-43	159,684	B-1	MUB	Vacant	78,980	0.49	10	10	20	59	99
18 Centerpointe Dr	276-081-42	113,183	B-1	MUB	Office	45,025	0.40	7	7	14	42	70
20 Centerpointe Dr	276-081-52	153,820	B-1	MUB	Office	56,280	0.37	10	10	19	57	95

Address	APN	Lot Size (Sq.Ft.)	Zone	General Plan	Existing Land Use	Bldg. Sq. Ft.	FAR	VL	Low	Mod	Above Mod	Total
22 Centerpointe Dr	276-081-53	63,109	B-1	MUB	Office	21,176	0.34	4	4	8	23	39
24 Centerpointe Dr	276-081-54	57,786	B-1	MUB	Office	22,657	0.39	4	4	7	21	36
26 Centerpointe Dr	276-081-40	62,911	B-1	MUB	Office	21,643	0.34	4	4	8	23	39
28 Centerpointe Dr	276-081-39	64,181	B-1	MUB	Office	23,250	0.36	4	4	8	24	40
30 Centerpointe Dr	276-081-38	98,031	B-1/FO	MUB/FO	Office, Retail, Restaurant	21,176	0.22	6	6	12	36	61
38-40 Centerpointe Dr	276-081-36	52,900	B-1/FO	MUB/FO	Restaurant & Medical	10,472	0.20	3	3	7	20	33
50 Centerpointe Dr	276-081-51	57,041	B-1	MUB	Restaurant & Retail	9,133	0.16	4	4	7	21	35
12 Centerpointe Dr	276-081-63	43,673	B-1	MUB	Office, Retail, Restaurant	15,198	0.35	3	3	5	16	27
TOTALS								224	224	449	1,347	2,244

Notes: Income distribution assumes 10% Very Low, 10% Low, 20% Moderate and 60% Above Moderate for each site.
Potential units estimated at the low end of the allowable density range (27 units/acre)
B-1: Mixed-Use Business FO: Freeway Overlay IO: Industrial Overlay MUB: Mixed Use Business

Figure C-5: Available Housing Sites



4.3 Financial Resources

4.3.1 Redevelopment Opportunities

In the past, the Redevelopment Agency (RDA) for the City was involved in maintaining, assisting, or producing over 168 affordable homes since its inception. The CDC used housing set-aside funds (20% of tax increment revenues within the 224-acre Redevelopment Project Areas) to support new housing construction, housing rehabilitation, and first-time homebuyer assistance throughout the City.

In 2011, the California Supreme Court ruled to uphold ABx1 26, which dissolved all redevelopment agencies (RDAs) in the State. The La Palma RDA was eliminated, and no additional housing set-aside funds are available.

4.3.2 Community Development Block Grants (CDBG) and HOME Funds

During the previous Housing Element planning period, the City did not apply for a CDBG award through the Urban County competitive process, nor has it applied for and received a HOME grant award. However, the City maintains a Cooperative Agreement with the County of Orange to participate in the Urban County competitive process. Through Housing Program 2, the City commits to seek outside funds for the preservation and rehabilitation of affordable housing during the 2021-2029 planning period.

Because the existing single-family housing stock, which comprises the majority of the housing in the City, is in excellent condition, there is little likelihood that redevelopment and replacement with higher density multi-family housing is likely to occur within the planning period of this Housing Element.

4.4 Opportunities for Energy Conservation

As residential energy costs rise, the subsequent increasing utility costs reduce the affordability of housing. Although the City is fully developed, new infill development and rehabilitation activities could occur, allowing the City to directly affect energy use within its jurisdiction.

The California Energy Efficiency Standards for Residential and Nonresidential Buildings were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are codified in Title 24 of the California Code of Regulations and are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. California's building efficiency standards (along with those for energy efficient appliances) have saved billions of dollars in electricity and natural gas costs since 1978.

Title 24 sets forth mandatory energy standards and requires the adoption of an “energy budget” for all new residential buildings and additions to residential buildings. Separate requirements are adopted for “low-rise”

residential construction (i.e., no more than 3 stories) and non-residential buildings, which includes hotels, motels, and multi-family residential buildings with four or more habitable stories. The standards specify energy-saving design for lighting, walls, ceilings and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards and the use of non-depleting energy sources, such as solar energy or wind power. The home building industry must comply with these standards while localities are responsible for enforcing the energy conservation regulations through the plan check and building inspection processes.

In 2010, the state made modifications to Title 24 to incorporate "green" building practices. The City of La Palma has adopted the 2019 edition of the California Building Codes, including the California Green Building Code.

The Community Development Department reviews and approves green improvements such as roof-mounted solar panels over the counter, subject to applicable building permits. In addition, the City housing rehabilitation program (see Housing Plan, Program 2) can result in energy savings through home improvements such as window and door replacement, energy-efficient appliances (e.g., water heaters), and new insulation/ weatherization.

5. Progress Report

Section 65588(a) of the Government Code requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This section reviews the housing goals, policies, and programs of the previous Housing Element (adopted in 2013), and evaluates the degree to which these programs have been implemented during the previous planning period 2014 through 2021. The findings from this evaluation have been instrumental in determining the City's 2021-2029 Housing Plan (Chapter 4 of the General Plan).

Table C-35 summarizes the programs contained in the previous Housing Element, along with the source of funding, program objectives, accomplishments, and implications for future policies and actions.

Table C-36 evaluates the appropriateness of previous goals and policies, and identifies any changes that are called for in response to the City's experience during the past planning period. Based on this evaluation, all of the current Goals and Policies continue to be appropriate and have been retained.

Table C-37 presents the City's progress in meeting the quantified objectives from the previous Housing Element.

Table C-35: Housing Element Program Evaluation 2014-2021

Name of Program	Objective	Timeframe in H.E	Status of Program Implementation
Section 8 Rental Assistance	Support OCHA's efforts and provide referrals to apartment complex owners for information on the Section 8 Housing Choice Voucher program. Continue to participate in the County Housing Authority's Committee for Municipalities participating in Section 8 County - Administered programs.	Ongoing	Implemented. Community Development assists public inquiries about Section 8 Housing via the OC Housing Authority website and their Affordable Housing Rental List. The City continues to lend support to OCHA and participate when asked in Section 8 Administered programs. The City's website includes Section 8 Rental Assistance page with good information.
Funding for Preservation and Rehabilitation of Affordable Housing	Apply for and utilize CDBG and HOME and/or other available funds to preserve and rehabilitate affordable housing units. Participate with non-profit housing entities to preserve at-risk affordable multifamily housing and/or convert market-rate housing into covenanted affordable housing.	Ongoing	The City maintains a Cooperative Agreement with the County of Orange to participate in the annual CDBG and HOME fund Urban County competitive process. The City intends to continue the agreement in order to ensure that local affordable housing opportunities remain. Staff is prepared to assist with applications for CDBG and HOME funds as requested.
Mortgage Assistance Certificate Program	Publicize availability of Orange County mortgage assistance programs by providing links between the County's and City's websites.	Ongoing	Implemented. The City's website provided links between the County's and City's website.
Mortgage Credit Certificate Program	Publicize availability of Orange County mortgage assistance programs by providing links between the County's and City's websites.	Ongoing	Implemented. The City's website provided links between the County's and City's website.
Reverse Mortgage Program	Publicize the availability of the reverse mortgage program. Refer all eligible parties who contact the City with an interest in this program to the Orange County Housing Authority.	Ongoing	Implemented. The City publicizes the reverse mortgage program to interested parties that contact the City. The City's website provides links between the County's and City's website.
Section 202 Elderly or Handicapped Housing	Facilitate development of elderly and handicapped housing by assisting with federal housing applications, providing density bonus incentives, and providing "gap" financing where possible, such as through application for CDBG funds. Support all viable nonprofit entities seeking Section 202 funding.	Ongoing	Staff is prepared to assist with applications for Section 202 Elderly or Handicapped Housing as requested.
Residential Code Enforcement Relief Program	Identify potential funding sources to continue the Residential Code Enforcement Relief Program. As funding permits, support lower income homeowners to comply with the City's minimum standards for property maintenance.	Ongoing	Staff has created a successful partnership program with a local home improvement retailer for supplies and volunteers to address Code Enforcement issues for affordable income residents as resources and volunteers are available.

Name of Program	Objective	Timeframe in H.E	Status of Program Implementation
Home Spotlight Award Program	As funds allow, continue the Home Spotlight Award Program rewarding high standards of property maintenance.	Ongoing	Implemented. The City's Community Activities Beautification Committee currently awards the Home Spotlight Award to residents who reinvest in their property and community.
Emergency, Transitional and Supportive Housing	1) Permit permanent emergency housing by right in the General Industrial zone with appropriate development standards.2) Clarify that transitional and supportive housing is a residential use that is subject to the same standards as other residential uses of the same type in the same zone.3) Work with local faith-based organizations and nonprofits to formally establish appropriate emergency and transitional housing sites, and advertise referral resources.	Ongoing	In early 2019 the City's participation in the North Orange County Service Planning Area for Homelessness Outreach Efforts had reached an important milestone. A regional partnership of thirteen 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" were identified based on a number of factors including zoning, proximity to related services and site availability. The Navigation Centers are to be 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 infinite 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 these Navigation Centers. Each of the North Orange County Service Planning Area cities

Name of Program	Objective	Timeframe in H.E	Status of Program Implementation
			also committed funds for construction and ongoing operation of the Navigation Centers. The La Palma Housing Successor Agency is funding the construction and ongoing operational costs for the City of La Palma. A MOU (Memorandum of Understanding) was prepared and presented to the City Councils of all thirteen city governments for execution in May 2019. Construction began in 2019 and the opening of the first 100 bed Navigation Center in Placentia, CA occurred shortly after the end of 2019 on March 31, 2020. This is a 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.
Density Bonus Program	Encourage the development of affordable housing by promoting the Affordable Housing Regulations to interested developers and property owners.	Ongoing	Implemented. City staff provide comprehensive zoning code information to property owners and developers regarding benefits of density bonus program to achieve RHNA goals for the City through potential new development(s).
Residential Land Use Designations and Controls	Ensure consistency between the General Plan and Development Code. Update the Development Code to reflect state law regarding manufactured housing.	Ongoing	Continuing efforts to ensure consistency between the General Plan and the Development Code.
Equal Housing Opportunity	Support the activities of the Fair Housing Council by publicizing its referral service to local residents.	Ongoing	Implemented. The City publicizes the Fair Housing Council to interested parties that contact the City. The City's website provides links between the County's and City's website.
Senate Bill 520 - Persons with Disabilities	Comply with SB 520 of 2001. Make reasonable accommodation information readily available to the public.	Ongoing	Implemented. The Community Development Departments has processed five no-fee reasonable accommodation requests located on single-family properties during the reporting period that granted relief from existing development standards to achieve better ADA design for the disabled homeowner(s). As an example of how the City implements reasonable accommodation procedures, in 2019 a family approached the City about doing accessibility improvements to their home to make it livable for a family member who is living with a disability. The scope included ramps and additions off the back of the house. The additions included a

Name of Program	Objective	Timeframe in H.E	Status of Program Implementation
			basement with rehabilitation pool and exercise area. Above the basement additions to the first and second floors were proposed with a new elevator to connect the basement with the first and second floors. A balcony was proposed off the second floor to allow access to the elevator for servicing and incorporate an escape slide from the second floor to the ground level. The Planning Division assisted the homeowners when they shared a conceptual plan showing accessibility improvements such as the addition and balcony encroaching into the required side and rear yard setbacks. Typically this request would have required a Variance and Precise Plan Amendment approved by the Development and Circulation Committee and the City Council. However, given the disability situation and the nature of the required improvements and additions, the project was determined to be a reasonable accommodation request that was approved administratively with no fee. Following approval of the administrative no fee reasonable accommodation the homeowners discovered the property had a high-water table during soils testing. The water table made the basement concept no longer cost effective as the engineering required to make it dewatered would be very expensive. The homeowner circled back to the City with a revised architectural plan and requested an amended Reasonable Accommodation Request to eliminate the basement and place the rehabilitation pool on the first floor of the addition. The revised request asked for a further reduction of the rear setback of the home from the 10 feet approved in 2019 to 5 feet which is less than the 15 feet minimum required by Municipal Code. The revised Reasonable Accommodation Request also enlarged the first floor and the overall footprint of the home which put the lot coverage at 55% which is greater than the 43% approved with the request in September of 2019 and the 45% maximum allowed by Code. This request would typically require a

Name of Program	Objective	Timeframe in H.E	Status of Program Implementation
			Variance and Precise Plan Amendment; however, given the disability situation for the family in the home and the nature of the required improvements and additions, the City administratively at no cost approved their request to amend their reasonable accommodation request. The family then obtained a building permit and constructed their accessibility improvements to their home.
Adequate Sites Implementation Program	Continue to provide appropriate land use designations to accommodate a range of housing types, particularly at densities that accommodate development of affordable housing. Waive application fees for lot merger and/or rezoning on sites identified to meet the RHNA. Accommodate the RHNA for each income category during the 2014-2021 planning period. Provide technical assistance and information on available parcels for lower-income developments at the request of private or non-profit housing providers. Technical assistance includes land development counseling by City planners; sites identified in the Housing Element will be discussed with interested parties. Maintain the sites inventory and Housing Element on the City's website.	Ongoing	The City continues to work with the community and residential developers to identify additional sites for potential future Accessory Dwelling Units (ADU's) and multi-family housing development to meet the City's 2014-2021 Regional Housing Needs Allocation included in the City of La Palma General Plan and Housing Element.
2018 and 2020 Accessory Dwelling Units (ADU's) Ordinances	This Ordinances were necessary to implement the State Accessory Dwelling Unit (ADU) laws	Ongoing	In 2018and again in 2020 the City adopted a new ADU Ordinances in compliance with State regulations. In reviewing all residential remodels occurring during the current RHNA cycle of 2014-2021, it is apparent that 7 of 10 residential applications would meet criteria for ADU standards. Going forward, we believe that ADU's represent a valuable resource for affordable housing opportunities for La Palma residents. Following adoption of the New ADU Ordinances, the City has received numerous inquiries from residents regarding ADU's on their property.

Table C-36: Appropriateness of Housing Element Goals and Policies 2014-2021

Goal	Policy	Appropriateness
Diversity of Housing Options		
1: Provide diverse housing opportunities to satisfy the physical, social and economic needs of the existing and future residents of La Palma, including those with special needs.	1.1 We will ensure that housing is safe and sanitary with adequate public services to accommodate the needs of City residents.	Appropriate – retain
	1.2 We will promote the continued maintenance and enhancement of the existing housing stock.	Appropriate – retain
	1.3 We will support innovative public, private and nonprofit efforts in the development of affordable housing, particularly for special needs groups.	Appropriate – retain
High-Quality Residential Development Standards		
2: High-quality residential development standards shall be maintained to ensure that livable neighborhoods are maintained, as well as, safety and aesthetic value.	2.1 We will continue to establish and enforce property regulations that promote the sound maintenance of property to enhance the livability and appearance of residential areas.	Appropriate – retain
	2.2 We will provide public services and improvements that support and improve neighborhood stability.	Appropriate – retain
Removal of Housing Constraints		
3: We will address and remove governmental constraints to the maintenance, improvement and development of housing, where appropriate and legally possible.	3.1 We will remove regulatory barriers to the development of emergency and transitional housing for the homeless. We will assist developers of emergency and transitional housing in locating sites and streamline the approval and permitting process for this housing.	Appropriate – retain
	3.2 We will provide flexibility in development regulations to permit higher density affordable housing to be developed in the City.	Appropriate – retain
	3.3 We will periodically review City development standards to ensure consistency with the General Plan and to facilitate high-quality affordable housing. Affordable, transitional and emergency housing applications will be moved through the approval and permitting processes in an expedient manner. We will assist in the filing of forms and permitting approvals from related agencies for affordable housing projects.	Appropriate – retain
Equal Housing Opportunity		
4: Assure that housing opportunities are available to all persons without regard to race, color, ancestry, national origin, religion or marital status.	4.1 We will encourage and support the enforcement of laws and regulations prohibiting the discrimination in lending practices in the sale or rental of housing.	Appropriate – retain
	4.2 We will assure and support the efforts of others to ensure that unrestricted access to housing is available to all segments of the community.	Appropriate – retain
	4.3 We will encourage and support local private, nonprofit groups, which address the housing needs of the homeless and other disadvantaged groups.	Appropriate – retain

Table C-37: Progress in Achieving Quantified Objectives 2014-2021

Program Category	Quantified Objective	Progress
New Construction		
Very Low	2	0
Low	2	2
Moderate	2	0
Above Moderate	3	10
Total	9	12

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