

2021-2029 HOUSING ELEMENT

Adopted
January 2022

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RESOLUTION NO. 2022-01

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LAKE FOREST, CALIFORNIA, ADOPTING THE “2021-2029 HOUSING ELEMENT” OF THE GENERAL PLAN

WHEREAS, the California Government Code requires that cities review and update their Housing Elements every eight (8) years, according to a schedule set forth by the State Department of Housing and Community Development (“HCD”); and

WHEREAS, the Housing Element sets forth the housing policies for the City, facilitates the preservation and development of housing, and establishes programs to accommodate the City's share of the regional housing needs in Southern California; and

WHEREAS, the City of Lake Forest has been assigned an allocation of 3,236 new housing units as its share of the regional housing needs assessment (“RHNA”) in Southern California; and

WHEREAS, in accordance with State Law, the City of Lake Forest has prepared a Draft Housing Element for the 6th Cycle covering 2021-2029 period in accordance with California Government Code Sections 65580-65589.8 attached hereto as Exhibit A; and

WHEREAS, in accordance with Government Code Section 65583, the City finds that the Housing Element (2021-2029) complies with the duty to Affirmatively Further Fair Housing; and

WHEREAS, the Housing Element (2021-2029) complies with the requirements of State law and conforms to the purposes, intent and provisions of all the Elements of the City's General Plan; and

WHEREAS, the Director of Community Development has reviewed the project's potential effects on the environment, and has recommended that the project is categorically exempt from the California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15183 which allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, such as the City's recent General Plan EIR; and

WHEREAS, in preparation of the Housing Element (2021-2029), the City developed a robust Community Engagement Plan with a dedicated website which received over 1,200 views; conducted two online surveys between November 23, 2020, through December 22, 2020, as well as stakeholder interviews with the Kennedy Commission, Welcoming Neighbors Home, and the Fair Housing Council of Orange County; and held a virtual workshop conducted throughout the month of December 2020 to educate the community about housing issues and opportunities and gather input on housing-related topics; and

WHEREAS, on September 23, 2021, pursuant to Government Code section 65585(b)(1), the City submitted the draft 2021-2029 Housing Element to the State of California Department of Housing and Community Development ("HCD"); and

WHEREAS, the California Department of Housing and Community Development must review and provide comments on the Public Draft Housing Element and the City must update the Public Draft Housing Element in response to those comments in order to comply with State Housing Law; and

WHEREAS, on October 7, 2021, the City hosted a public open house event at which the draft Housing Element was shared and feedback was solicited; and

WHEREAS, the City gave notice of the public hearing at which the project would be considered by the Planning Commission by publishing a notice in a newspaper of general circulation on October 21, 2021, and by posting a notice at City Hall and at the Foothill Ranch branch of the Orange County Public Library; and

WHEREAS, on November 4, 2021, the Planning Commission of the City of Lake Forest conducted a public hearing for the purpose of considering a Housing Element update and the Planning Commission reviewed a public review draft for purposes of providing review and program recommendations to staff and adopted a resolution recommending the City Council adopt the Housing Element inclusive of revisions necessary to comply with State Housing Law; and

WHEREAS, the City Council has duly considered all evidence, including the testimony of the City's Consultant, interested parties, and the evaluation and recommendations by staff, presented at said hearing.

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF LAKE FOREST DOES RESOLVE, DETERMINE, FIND AND ORDER AS FOLLOWS:

SECTION 1. CEQA. This project is categorically exempt from the California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15183, which allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, such as the City's recent General Plan EIR. An Environmental Analysis has been prepared to demonstrate this finding attached hereto as Exhibit B.

SECTION 2. The City Council further finds as follows:

- a. Finding: The Draft Housing Element is consistent with the goals and policies of the General Plan.

Fact: The Draft Housing Element is a State-mandated Element of the City of Lake Forest's General Plan. California State Legislation requires that the Housing Element be updated every eight years to adequately plan for the City's housing needs. The Housing Element identifies sites that may accommodate the City's Regional Housing Needs Assessment (RHNA) obligation. As such, the Draft Housing Element is consistent with the goals and policies of the General Plan.

- b. Finding: State law requires the adoption of a Housing Element as part of the General Plan of each municipality and said element shall be updated every eight years.

Fact: The current Housing Element for Lake Forest was adopted by the City Council in January 2014 for the 2014-2021 (5th Cycle) planning period and was certified by the State. Lake Forest has complied with the State mandate to update its Housing Element for the 2021-2029 planning period.

- c. Finding: As required by State law during the preparation of an amendment to the General Plan, the planning agency has provided opportunities for the involvement of citizens, public agencies, civic, educational, and other community groups, though public hearing and other means the city deems appropriate.

Fact: Public involvement has been completed which included the involvement of residents, local housing community, several non-profit housing advocates, and key City staff. The City worked diligently to engage the community in safe and appropriate ways throughout 2020,

during the COVID19 pandemic, when traditional in-person activities were not possible to conduct. This outreach also extended to the General Plan Update which was conducted during pre-COVID-19 protocols and included dozens of community meetings, an open house, and public hearings, where the community had the opportunity to weigh-in on key areas for future residential and non-residential growth. Further, the Planning Commission conducted a public hearing on November 4, 2021.

- d. Finding: The City Council finds that the update to the Housing Element was prepared in accordance with State law and reviewed by the State Department of Housing and Community Development (HCD) as required by the California Government Code.

Fact: The City submitted a copy of the Housing Element on September 23, 2021, to HCD. HCD submitted a review letter to the City on November 22, 2021. Comments received from HCD were addressed and incorporated into the final document for City Council adoption of the Housing Element.

- e. Finding: In accordance with State law, the City Council finds that the existing uses on the nonvacant sites included in the inventory are likely to be discontinued during the planning period.

Fact: City of Lake Forest is essentially entirely built out. There is no vacant unentitled land remaining to accommodate new multifamily residential development. In order to accommodate its fair share of regional housing growth, the City must identify nonvacant sites to accommodate its remaining RHNA for all income levels (not only its lower income requirements). The City has specifically analyzed whether existing uses constitute an impediment for residential uses on the site. Additional information provided in Appendix A Sites Analysis of the Housing Element (Exhibit A attached hereto) demonstrates that existing uses on the sites identified to accommodate a portion of the City's RHNA do not constitute an impediment for residential uses on the site. Additional information regarding current operations and tenants, vacancies, properties listed for rent or sale, the demand for the current use, and contact with property/business owners are included. The City has considered each site individually and has concluded that, based on the substantial evidence provided, current uses are not an impediment to the sites' redevelopment for residential uses (refer to the Suitability of Nonvacant Sites analysis on page BR-100 of Exhibit A).

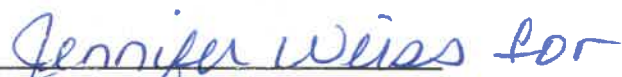
SECTION 3. CITY COUNCIL ACTIONS. The City Council does hereby adopt the Housing Element (2021-2029) inclusive of revisions necessary in order to comply with State Housing Law.

PASSED, APPROVED AND ADOPTED this 4th day of January 2022, by the following vote, to wit:




ROBERT PEQUEÑO
MAYOR

ATTEST:



LISA BERGLUND, MPA
CITY CLERK

APPROVED AS TO FORM:



MATTHEW E. RICHARDSON
CITY ATTORNEY

STATE OF CALIFORNIA)
COUNTY OF ORANGE) SS.
CITY OF LAKE FOREST)

I, Lisa Berglund, City Clerk of the City of Lake Forest, California, do hereby certify that the foregoing Resolution No. 2022-01 was duly passed and adopted at a regular meeting of the Lake Forest City Council on the 4th day of January 2022, by the following vote, to wit:

AYES:	COUNCIL MEMBERS:	CIRBO, PEQUEÑO, MOATAZEDI, VOIGTS
NOES:	COUNCIL MEMBERS:	
ABSTAIN:	COUNCIL MEMBERS:	
ABSENT:	COUNCIL MEMBERS:	TETTEMER

Jennifer Weiss for
LISA BERGUND, MPA
CITY CLERK



2021-2029 HOUSING ELEMENT

Adopted
January 2022

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2021-2029 Housing Element Organization

Part 1: Housing Plan

Part 1 of the 2021-2029 Housing Element is the City's "Housing Plan", which includes the goals, policies, and programs the City will implement to address constraints and needs. The City's overarching objective is to ensure that decent, safe housing is available to all current and future residents at a cost that is within the reach of the diverse economic segments which comprise Lake Forest.

Part 2: Background Report

Part 2 of the 2021-2029 Housing Element is the "Background Report" which identifies the nature and extent of Lake Forest's housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, and energy conservation opportunities. By examining the City's housings, resources, and constraints, the City can then determine a plan of action for providing adequate housing, as presented in Part 1: Housing Plan. In addition to identifying housing needs, the Background Report also presents information regarding the setting in which these needs occur. This information is instrumental in providing a better understanding of the community, which in turn is essential for the planning of future housing needs.

Appendix A: Housing Sites Inventory

The Housing Element must include an inventory of land suitable and available for residential development to meet the City's regional housing need by income level. [Appendix A also includes a detailed analysis of nonvacant sites identified to meet a portion of the City's lower income RHNA, including a description of existing uses, analysis of development trends applicable to each site, and a photo catalogue.](#)

Appendix B: Public Engagement Summary

As part of the Housing Element Update process, the City hosted numerous opportunities for the community and key stakeholders to provide feedback on existing housing conditions, housing priorities, priority areas for new residential growth, and topics related to fair housing. Public participation played an important role in the refinement of the City's housing goals and policies and in the development of new housing programs, as included in Part 1: Housing Plan. The public's input also helped to validate and expand upon the contextual information included in Part 2: Background Report. The City's efforts to engage the community in a meaningful and comprehensive way are summarized in Appendix B.

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PART 1: HOUSING PLAN

Adopted
January 2022

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FINAL DRAFT

1 2021-2029 Housing Plan Introduction

This section presents the City's Housing Plan, including goals, policies, and programs the City will implement to address constraints and needs. The City's overarching objective is to ensure that decent, safe housing is available to all current and future residents at a cost that is within the reach of the diverse economic segments which comprise Lake Forest. To this end, the Housing Plan focuses on:

- 1) Encouraging housing diversity and opportunities;
- 2) Maintaining, preserving, and conserving existing residential neighborhoods;
- 3) Increasing opportunities for home ownership;
- 4) Promoting equal opportunity for all residents to reside in the housing of their choice.

2 Goals and Policies

The Housing Element Background Report evaluates the City's housing needs, opportunities and constraints, and presents a review of the previous element. This Housing Plan reflects the City's experience during the 2013-2021 planning period and sets forth the City's goals, policies, and programs to address the identified housing needs and issues for the 2021-2029 planning period. Quantified objectives for new construction, rehabilitation and conservation are also identified. The goals and policies that guide the City's housing programs and activities are as follows:

ISSUE: HOUSING DIVERSITY AND OPPORTUNITIES

Goal 1: Adequate housing to meet the existing and future needs of Lake Forest residents.

Policy 1.1: Allow for the development of a variety of housing opportunities (ownership and rental) in Lake Forest including low-density single-family homes, moderate-density townhomes, higher-density apartments and multi-family projects, mixed-use development, accessory dwelling units, and mobile homes to fulfill regional housing needs.

Policy 1.2: Support the development of affordable housing by offering development incentives on a case-by-case basis.

Policy 1.3: Support the provision of housing and supportive services for extremely low-income households and special groups, such as the elderly, persons with disabilities (including developmental disabilities), large families, single-parent households, and those in need of temporary shelter.

Policy 1.4: Promote the development of new housing units in the City's mixed-use focus areas which are located along the City's major transportation corridors and near community activity centers.

Policy 1.5: Remove or reduce constraints on affordable housing development to the extent feasible.

- Policy 1.6: Encourage residential developments to incorporate a minimum of 15% affordable units, including units affordable to extremely low-income households.
- Policy 1.7: Maintain adequate capacity to accommodate the City's unmet Regional Housing Needs Assessment (RHNA) allocation for all income categories throughout the planning period.
- Policy 1.8: Allow by-right approval of housing developments proposed on non-vacant sites included in the previous housing element inventory and on vacant sites included in the two previous housing element inventories, provided that the proposed housing development includes at least 20 percent lower-income affordable housing units.

ISSUE: MAINTENANCE, PRESERVATION, AND CONSERVATION OF HOUSING

Goal 2: Maintenance and enhancement of the quality of existing residential neighborhoods.

- Policy 2.1: Promote programs that improve the overall quality and conditions of existing housing in Lake Forest with an emphasis on housing that is affordable to lower-income households.
- Policy 2.2: Promote and facilitate the conservation and rehabilitation of the City's older residential properties.
- Policy 2.3: Subject to the availability of funds, continue to offer rehabilitation and home improvement loans to qualified households.
- Policy 2.4: Evaluate opportunities for comprehensive neighborhood improvements, including focused code enforcement and neighborhood clean-up days, and implement such activities as warranted.
- Policy 2.5: Endeavor to preserve income-restricted affordable housing in the City that is at-risk of converting to market-rate.
- Policy 2.6: Promote a balance of rental and affordable ownership housing.
- Policy 2.7: Continue to support County efforts to preserve and expand rental assistance programs for extremely low-income households, including the Housing Choice Voucher Program.

ISSUE: HOME OWNERSHIP

Goal 3: Increased opportunities for home ownership.

- Policy 3.1: Encourage the development of affordable ownership housing for first-time homebuyers.
- Policy 3.2: Pursue state and federal funding sources to provide fair home purchase options to lower- and moderate-income households.

Policy 3.3: Collaborate in regional efforts to pursue funding, such as mortgage revenue bonds and Mortgage Credit Certificates, for homeownership assistance programs.

ISSUE: EQUAL OPPORTUNITY

Goal 4: Promote equal opportunity for all residents to reside in housing of their choice by affirmatively furthering fair housing.

Policy 4.1: Encourage and support the enforcement of laws and regulations prohibiting discrimination in the sale, rental, or financing of housing based on race, color, ancestry, religion, national origin, sex, sexual orientation, gender identity, age, disability/medical conditions, familial status, marital status, source of income, or any other arbitrary factor.

Policy 4.2: 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 Zoning Code.

Policy 4.3: Assist in the enforcement of fair housing laws by providing support to organizations that can receive and investigate fair housing allegations, provide outreach and education regarding fair housing rights, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.

Policy 4.4: Encourage design which supports aging in place (such as universal design) in new development.

Policy 4.5: Encourage the development of housing affordable to lower-income households and housing for special needs groups throughout the community.

Policy 4.6: Provide information to the public on available housing, housing affordable to lower-income households, and special needs housing through the City's public information channels.

3 Cycle 6 Housing Element Programs

Lake Forest offers a variety of housing opportunities to meet the needs of the community and comply with state Housing Law. This section of the Housing Plan addresses the issues identified in the previous sections of the Element and provides a strategy to achieve the City's housing goals. The housing programs designed to implement the City's strategy are discussed in detail below.

The City has considered each program as it relates to affirmatively furthering fair housing. In addition to identifying the responsible agencies, funding sources, objectives, and timeframes for each program, the City has also identified the fair housing issue(s) and contributing factor(s) addressed by each program. For further information regarding fair housing issues and contributing factors in Lake Forest, see Section 6 of the Background Report.

PROVISION OF ADEQUATE HOUSING SITES TO ACHIEVE A VARIETY OF HOUSING TYPES AND DENSITIES

A key element in satisfying the housing needs of all segments of the community is the provision of adequate sites for housing. This is an important function of both the General Plan and zoning.

Program 1: Land Use Policy, Entitlements, and Development Capacity (Shortfall Program)

Planning and regulatory actions to achieve adequate housing sites are implemented through the Land Use Element, Zoning Code, and, in some instances, development agreements. These regulatory documents provide for a variety of residential development, ranging from lower-density single-family homes to higher-density apartments, condominiums, and mixed-use projects.

The City of Lake Forest received a RHNA allocation of 3,236 units for the 2021-2029 RHNA period. After credits for constructed units (~~755~~461) and approved/entitled units (~~753~~976) are taken into consideration, the City of Lake Forest has a remaining 2021-2029 RHNA of 1,847~~6~~ units, including 848 extremely/very low-income, ~~445~~447 low-income, and ~~553~~552 moderate-income units.

While the City adopted its new General Plan in 2040 which establishes new mixed-use focus areas which designate sufficient sites to accommodate the City's remaining RHNA, the City has not yet adopted new zoning standards to implement the land use designations. Without the zoning in place, the City finds that it currently has a shortfall of sites to accommodate its remaining RHNA and must commit to a program to rezone sufficient sites to accommodate its RHNA for all income levels. The City is committed to rezoning all necessary parcels to create consistency with the General Plan Land Use Map, and is specifically committed, through this program, to complete the rezoning for all sites identified in Appendix A (Site Inventory) in accordance with the acreages, densities, and unit capacities identified therein. Additionally, the City will complete the rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i). The new Zoning Map will be made available online and in person in accordance with transparency requirements.

The residential sites inventory consists of approximately 159 acres of land designated in mixed-use areas which allow for residential development at densities beyond 30 du/ac, with the potential to yield at least 2,965 new units.

These sites are located in areas adjacent to major transportation facilities and activity centers; the co-location of attainable/affordable housing choices near transportation facilities and goods and services will improve access to opportunity for all persons, especially lower income households and persons with special needs, including persons with disabilities.

The City has also identified 34.55 acres of underdeveloped residential uses (two sites) that could yield an additional 382 units affordable to moderate and above moderate income households. Also construction of new accessory dwelling units (ADUs) will also add to the City's housing stock. Together, these resources have the capacity to accommodate at least 3,378 new units affordable to all income levels. These sites can accommodate the City's remaining RHNA allocation for all income levels through year 2029. The City will maintain an inventory of sites with residential development potential and provide it to prospective residential developers upon request.

Responsible Agencies: Community Development Department

Funding Sources: General Fund

2021-2029 Objectives: Maintain and monitor the residential sites inventory to ensure sufficient sites remain to accommodate the RHNA allocation throughout the RHNA period. Receive and process development applications for residential projects. Rezone all sites identified in Appendix A consistent with the densities, acreages, and capacity levels identified in Appendix A. Complete all rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i).

Timeframe: Complete all necessary rezoning by October 15, 2022; Annual monitoring and reporting throughout the planning period.

Fair Housing Issues Addressed: Segregation and Integration; Disparities in Access to Opportunity; Racially and Ethnically Concentrated Areas of Poverty/Affluence; Disparities in Access to Opportunity for Persons with Disabilities; Disproportionate Housing Needs, including Displacement Risks; Site Inventory

Contributing Factors Addressed: Community Opposition; Lack of Community Revitalization Strategies; Lack of Private Investment in Specific Neighborhoods; Land Use and Zoning Laws; Location and Type of Affordable Housing; Impediments to Mobility; Lack of Opportunity Due to High Housing Costs; Access to Transportation for Persons with Disabilities; Availability of Affordable Units in a Range of Sizes; Location of Employers

Program 2: Monitor Residential Capacity (No Net Loss)

The City will monitor the depletion of residential acreage, and review proposed General Plan amendments, Zone Changes, and development projects, to ensure an adequate inventory is available to meet the City's 2021-2029 RHNA obligations. To ensure sufficient residential development capacity is maintained to accommodate the City's RHNA allocation, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863 and will make the findings required by that code section if a site is proposed for development with fewer units or at a different income level(s) than shown in the Housing Element Site Inventory. Should an approval of development result in a reduction of residential development capacity below the capacity needed to accommodate the remaining need for lower-income, moderate-income, or above-moderate-income households, the City, and potentially the applicant (in accordance with State law), will identify and, if necessary, rezone sufficient sites within 180 days to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA allocation, consistent with State law. Any rezoned site(s) will satisfy the adequate site requirements of Government Code Section 65583.2 and will be consistent with the City's obligation to affirmatively further fair housing.

Responsible Agencies: Community Development Department

Funding Sources: General Fund

2021-2029 Objectives: Maintain adequate capacity to accommodate the City's RHNA obligations at all income levels throughout the planning period. Report as required through the HCD annual report process.

Timeframe: Ongoing implementation, at time of approval of a project on a site listed in the Housing Element, and annual reporting throughout the planning period.

Fair Housing Issues Addressed: Racially and Ethnically Concentrated Areas of Poverty/Affluence; Disparities in Access to Opportunity; Disproportionate Housing Needs, including Displacement Risks

Contributing Factors Addressed: Community Opposition; Displacement of Residents Due to Economic Pressures; Location and Type of Affordable Housing; Lack of Access to Opportunity due to High Housing Costs

Program 3: Public Property Conversion to Housing Program

The City will maintain a list of surplus City-owned lands, including identification of address, APN, General Plan land use designation, zoning, current use, parcel size, and status (surplus land or exempt surplus land). The City will work with non-profits and public agencies to evaluate the feasibility of transferring surplus City-owned lands not committed to other City purposes for development of affordable housing by the private sector. The inventory will be updated annually in conjunction with the Annual Progress Report ("APR") (Program 1). Any disposition of surplus lands shall be conducted consistent with the requirements of Government Code Section 54220 et. seq.

Responsible Agencies:	City Manager's Office
Funding Sources:	General Fund and federal and State technical assistance grants
2021-2029 Objectives:	Collaborate with the development community <u>on an annual basis</u> , including affordable housing developers, to evaluate the viability of developing City-owned land as affordable housing.
Timeframe:	Annually
<u>Fair Housing Issues Addressed:</u>	<u>Disparities in Access to Opportunity; Disproportionate Housing Needs, Including Displacement Risks</u>
<u>Contributing Factors Addressed:</u>	<u>Lack of Public Investment in Specific Neighborhoods, including Services or Amenities; Lack of Local or Regional Cooperation; Land Use and Zoning Laws</u>

Program 4: Replacement of Affordable Units

Consistent with the requirements of Government Code Section 65583.2(g), development projects on sites in the housing inventory (Appendix A) that have, or have had within the five years preceding the application, residential uses restricted with rents affordable to low- or very low-income households or residential uses occupied by low- or very low-income households, shall be conditioned to replace all such units at the same or lower income level as a condition of any development on the site, and such replacement requirements shall be consistent with Section 65915(c)(3).

Responsible Agencies:	Community Development Department
Funding Sources:	General Fund; replacement costs to be borne by developer of any such site
2021-2029 Objectives:	For all project applications, identify need for replacement of affordable housing units and ensure replacement, if required, occurs.

Timeframe: Ongoing

Fair Housing Issues

Addressed:

Fair Housing Enforcement and Outreach Capacity; Segregation and Integration; Disparities in Access to Opportunity; Disproportionate Housing Needs, Including Displacement Risks

Contributing Factors

Addressed:

Displacement of Residents Due to Economic Pressures; Location and Type of Affordable Housing; Lack of Opportunity Due to High Housing Costs; Quality of Affordable Housing Information Programs; Community Opposition; Loss of Affordable Housing

Program 5: Facilitate Affordable and Special Needs Housing Construction

The City can encourage and facilitate affordable housing construction through financial assistance, removal of regulatory constraints, and administrative support. With limited funding, the City will rely on the following actions to encourage affordable housing production during the planning period:

- *Affordable Housing Implementation Plans (AHIPs):* During the two previous Housing Element cycles, the City entered into Development Agreements (DA) with the property owners/developers of land that was newly entitled for residential use. The DAs include an Affordable Housing Implementation Plan (AHIP) that required the production of affordable units in conjunction with the development. The City continues to monitor and enforce approved AHIPs and affordable housing covenants.
- *Collaborate with Affordable Housing Developers:* Affordable housing developers work to develop, conserve and promote rental and ownership affordable housing. Particularly in relation to senior housing, the affordable housing developer is often, but not always, a local organization interested in developing affordable housing. The affordable housing developer is often involved with what is called "assisted housing", where some type of government assistance (such as Housing Choice Voucher program or Tax Credits) is provided to the individual household to keep rents affordable. An affordable housing developer may help meet the City's goal of incorporating a minimum of 15% affordable units within new residential developments by implementing or assisting with the implementation of programs described in this Element. The City will continue to proactively collaborate with affordable housing developers to identify potential sites, write letters of support to help secure governmental and private-sector funding, and offer technical assistance related to the application of State density bonus provisions. The City will proactively provide affordable housing developers with maps illustrating high resource areas and areas with high levels of people-based and place-based opportunities in the City in order to highlight opportunities for new development to affirmatively further fair housing. In addition, the City will proactively provide developers the list of housing sites identified in Appendix A, which identifies those sites which are located in a 2021 TCAC/HCD moderate or high resource zone.

- *Regulatory Concessions and Incentives:* The City will continue to work with developers on a case-by-case basis to provide State-mandated regulatory concessions and incentives to assist with the development of affordable and senior housing. In a relatively small city like Lake Forest, this is the most effective method of assisting developers, as each individual project can be analyzed to determine which concessions and incentives would be the most beneficial to the project's feasibility. State-mandated regulatory concessions and incentives could include, but are not limited to, density bonuses, parking reductions, fee reductions or deferral, expedited permit processing, and modified or waived development standards.
- *Collaborate with Housing Developers to Accommodate Large Families:* Developers of affordable and market rate housing can help address the special needs of the community's large families by providing a mix of unit types and sizes, including units with more than three bedrooms. The City will advise developers regarding the presence of larger families in Lake Forest and encourage them to include units with more than three bedrooms, if feasible.
- *Low-Income Housing Tax Credits (LIHTC):* The City will assist developers in gaining funding for the development of affordable housing through the LIHTC program. Investors receive a credit against federal tax owed in return for providing funds to developers to build or renovate housing for low-income households. In turn, the capital subsidy allows rents to be set at below market rates.

Responsible Agencies: Community Development Department;

Funding Sources: General Fund

2021-2029 Objectives: Monitor the City's existing affordable housing stock and support affordable housing developers in their efforts to develop new affordable units in Lake Forest.

Timeframe: Annual outreach to the development community; Provide ongoing assistance to interested affordable housing developers.

Fair Housing Issues Addressed: Outreach; Fair Housing Enforcement and Outreach Capacity; Segregation and Integration; Disparities in Access to Opportunity; Disproportionate Housing Needs, Including Displacement Risks

Contributing Factors Addressed: Lack of Private Fair Housing Outreach and Enforcement; Lack of Local or Regional Cooperation; Lack of Private Investment in Specific Neighborhoods; Location of Accessible Housing; Availability of Affordable Units in a Range of Sizes; Quality of Affordable Housing Information Programs

REMOVAL OF CONSTRAINTS

State law requires the Housing Element to address, and where appropriate and legally possible, remove constraints affecting the maintenance, improvement, and development of housing. The following programs are designed to lessen governmental and nongovernmental constraints on housing development during the planning period.

Program 6: Monitor and Implement Changes in Federal and State Housing, Planning, and Zoning Laws

Although the 2021-2029 Housing Element update did not identify any *significant* governmental constraints to the development or maintenance of housing in Lake Forest, the City will continue to monitor its development process and zoning regulations to identify and remove constraints to the development of housing and affirmatively further fair housing goals. The City will also continue to monitor federal and State legislation that could impact housing and comment on, support, or oppose proposed changes or additions to existing legislation, as well as support new legislation when appropriate. The City will also endeavor to minimize governmental constraints to the development, improvement, and maintenance of housing.

As part of this program, the City commits to implementing current federal and State housing, planning and zoning laws. This includes complying with new transparency requirements for posting all zoning, development standards and fees on the City's website. While the City currently posts all zoning, development standards, and fees in various locations on the City's website, the City will consolidate this information into the City's Planning Division webpage to further support transparency and public access to information in compliance with new transparency laws.

Responsible Agencies: Community Development Department; City Manager's Department

Funding Sources: General Fund

2021-2029 Objectives: Comply with new transparency requirements for posting zoning, development standards, and fees on the City's website. Stay updated on changes in federal and state housing, planning, and zoning laws and participate in providing review and comments as appropriate.

Timeframe: Update the City's website with consolidated zoning, development standards, and fee information by October 15, 2022. Annual monitoring and reporting throughout the planning period through the Housing Element Annual Progress Report (APR).

Fair Housing Issues Addressed: Fair Housing Enforcement and Outreach Capacity; Site Inventory

Contributing Factors Addressed: Land Use and Zoning Laws; Lack of State or Local Fair Housing Laws; Regulatory Barriers to Providing Housing and Supportive Services for Persons with Disabilities

Program 7: Zoning Code Amendments – Housing Constraints

The City shall update the Zoning Code to remove constraints to housing development and ensure the City's standards and permitting requirements are consistent with State law. The update shall address the following:

- A. **Mixed-Use Standards.** The Zoning Code shall be updated to address standards related to mixed-use development at densities and intensities consistent with the Mixed-Use land use designations adopted as part of the City's comprehensive General Plan Update approved in 2020. This process is anticipated to be completed by the end of 2022. See Program 1 (Shortfall Program) for more information.
- B. **Low Barrier Navigation Centers:** The Zoning Code shall be updated to define and permit low-barrier navigation centers consistent with the requirements of Government Code Sections 65660 through 65668, including treating low-barrier navigation centers as a by-right use in areas zoned for mixed use and in nonresidential zones permitting multi-family uses (if applicable).
- C. **Transitional and Supportive Housing:** The Zoning Code shall be revised as necessary to ensure that transitional and supportive housing ~~is are~~ allowed in residential and mixed-use zones ~~subject to the same standards as a residence of the same type in the same zone consistent in accordance~~ with Government Code Section 65583(c)(3), and to allow eligible supportive housing ~~as a by-right use~~ in zones where multi-family and mixed uses are permitted pursuant to in accordance with Government Code Sections 65650 through 65656.
- D. **Employee Housing and Agricultural Worker Housing:** The Zoning Code will be updated to ~~define comply with Health and Safety Code Sections 17021.5, .6, .8~~ "employee housing" distinctly from "agricultural worker housing" and to clarify that ~~employee housing serving six or fewer employees shall be deemed a single-family structure and shall be subject to the same standards for a single-family residence in the same zone. Specifically, the City will only refer to it as employee housing and not make a distinction between agricultural versus employee housing types.~~
- ~~E. **Agricultural Worker Housing.** The Zoning Code will be updated to define "agricultural worker housing" and to identify that any agricultural worker housing providing no more than 36 beds in a group quarters, or consisting of 12 or fewer units or spaces, shall be deemed an agricultural land use and permitted in the same manner as agricultural uses consistent with Health and Safety Code Section 17021.6. The Zoning Code will also be updated to provide for streamlined, ministerial approval of agricultural worker housing that meets the requirements of Health and Safety Code Section 17021.8.~~
- F.E. Streamlined and Ministerial Review for Eligible Affordable Housing Projects:** The Zoning Code will be updated to ensure that eligible multi-family projects with an affordable housing component are provided streamlined review and are subject only to objective design standards consistent with relevant provisions of SB 35 and SB 330, as provided for by applicable sections of the Government Code, including but not limited to Sections 65905.5, 65913.4, 65940, 65941.1, 65950, and 66300. State law defines objective design standards as those that "involve no personal or subjective judgement by a public official and are

uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant and public official prior to submittal."

G.F. Emergency Shelter Parking: The Zoning Code will be updated to require sufficient parking to accommodate all staff working in an emergency shelter, provided that the standards will not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with AB 139.

Responsible Agencies: Community Development Department

Funding Sources: General Fund

2021-2029 Objectives: Ensure that the City's Zoning Code is consistent with State law and update the Zoning Code as needed to comply with future changes.

Timeframe: Zoning Code Amendments adopted by December 2022.

Fair Housing Issues
Addressed:

Segregation and Integration; Disparities in Access to Opportunity

Contributing Factors
Addressed:

Lack of Affordable In-Home or Community-Based Supportive Services; Lack of Assistance for Transitioning from Institutional Settings to Integrated Housing; Land Use and Zoning Laws; Occupancy Codes and Restrictions

Program 8: Accessory Dwelling Units

Accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) help meet the City's housing needs for all income levels and also provide a housing resource for seniors, students, and low- and moderate-income households throughout the entire Lake Forest community, not just in any single geographic area. The City will continue to apply Zoning Code regulations that allow ADUs and JADUs (also known as second units or granny flats) by right in all residential zones, in accordance with State law. The City of Lake Forest will amend the ordinance as necessary to comply with current State Law. ~~Based on future changes to State law,~~ the City will continue to amend the ordinance as necessary and work with HCD to ensure continued compliance with State Law. The City will also continue to monitor trends regarding the extent of ADU production to ensure that the Housing Element goals can be met.

While the City will continue to promote the opportunity for residents to develop ADUs throughout Lake Forest consistent with Section 9.146.050 of the Lake Forest Municipal Code, the City is focused on promoting the development of ADUs that are affordable to lower income and moderate income households, and the development of ADUs in areas of opportunity as described in the Affirmatively Furthering Fair Housing section of the Housing Element Background Report. To the extent feasible, the City will survey ADU owners/builders to determine if they will be affordable to lower- or moderate-income households. The City will ask ADU applicants to voluntarily share

the unit's intended rental rate (if applicable) to track the supply of affordable ADUs in the City. Additionally, by the end of 2023, the City will identify and evaluate potential incentives (if any) to encourage production of affordable ADUs, particularly in high resource areas (as described in the Affirmatively Furthering Fair Housing section of the Housing Element Background Report), and present potential strategies to implement those incentives to the Planning Commission and/or City Council during the planning period.

The City will prepare new ~~provide hard copies of~~ ADU factsheets (in English and Spanish) and provide hard copies at City Hall and community facilities and share electronic versions on City social media accounts by June of 2022. Upon request, the City will provide homeowner associations (HOAs) and other civic organizations with guidance to assist with the development of ADUs and work proactively to educate the community regarding the role ADUs play in providing affordable housing options and affirmatively furthering fair housing. The City has set a target of briefing at least one HOA or civic organization on the City's ADU ordinance per year.

Responsible Agencies: Community Development Department

Funding Sources: General Fund

2021-2029 Objectives: Maintain an ADU Ordinance consistent with State Law. Support the development of accessory dwelling units in neighborhoods throughout the City.

Timeframe: Update the City's current ADU ordinance by October 15, 2022 to comply with current State Law. Survey ADU owners/builders to determine affordability and update ADU application to inquire about affordability level: 2021-2022; identify and evaluate potential incentives to encourage production of affordable ADUs: 2022-2023; and present findings to the City's Planning Commission and/or City Council: 2023; implementation and annual reporting throughout the RHNA period through the Housing Element Annual Progress Report: continuous. Prepare and distribute bilingual ADU factsheet by June of 2022. Invite all HOAs and relevant civic organization to meet annually to discuss the City's ADU ordinance.

Fair Housing Issues Addressed: Segregation and Integration; Racially and Ethnically Concentrated Areas of Poverty/Affluence; Disparities in Access to Opportunity

Contributing Factors Addressed: Availability of Affordable Units in a Range of Sizes; Displacement of Residents Due to Economic Pressures; Lack of Access to Opportunity Due to High Housing Costs; Location and Type of Affordable Housing

HOUSING AND SUPPORTIVE SERVICES FOR SPECIAL NEEDS POPULATIONS (GOAL 1)

Where there is a need for affordable housing, often there is also a need for supportive services for lower income households, including the homeless, extremely low-income households, and persons with disabilities (including developmental disabilities). The City assists service providers, with the allocation of CDBG funds, in meeting the immediate needs of persons with special needs, including the homeless, near-homeless, and extremely low-income households. Immediate need includes the provision of food, temporary shelter, health care, and other social services. The following programs are intended to address the overall need for housing and supportive services for special needs populations in Lake Forest.

Program 9: Sites for Homeless Shelters/Homeless Prevention and Assistance Services

Homelessness is a chronic problem throughout Southern California. While the majority of the County's homeless are in the older, more urbanized jurisdictions and in the beach communities, the 2019 Orange County Point-In-Time Report data indicates approximately 112 homeless persons within the City on any given night (for more information, see the Housing Element Background Report). In addition, the City has numerous households that may be considered at-risk of becoming homeless by virtue of their limited incomes. It is important for the City to provide and maintain the appropriate zoning to accommodate the provision of facilities that serve the homeless population, most of whom are extremely-low-income, in accordance with State law.

The City allocates CDBG funding to assist with homeless prevention and assistance services to organizations such as Families Forward, South County Outreach, and Family Assistance Ministries. The City contracts with Mercy House to provide an outreach worker in Lake Forest. The outreach worker helps the homeless get into shelters, secure transitional or permanent housing, obtain medical assistance, or be admitted into a recovery program. The City also has a full time Homeless Liaison Officer ("HLO") who works with the City's homeless outreach provider to establish trust and communication with the homeless in an effort to offer supportive services.

Responsible Agencies:	Community Development Department, City Manager
Funding Sources:	CDBG, State HEAP funds
2021-2029 Objectives:	Support non-profit organizations that shelter the homeless (subject to available funding and on a case-by-case basis).
Timeframe:	Annual monitoring and reporting throughout the planning period through the Housing Element Annual Progress Report (APR)

<u>Fair Housing Issues Addressed:</u>	<u>Fair Housing Enforcement and Outreach Capacity; Disparities in Access to Opportunity; Disproportionate Housing Needs, Including Displacement Risk</u>
<u>Contributing Factors Addressed:</u>	<u>Lack of Affordability, Integrated Housing for Individuals who need Supportive Services; Lack of Assistance for Transition from Institutional Settings to Integrated Housing; Lack of Effective Accommodations for Unhoused Persons with Disabilities</u>

Program 10: Transitional/Supportive and Affordable Housing

The City provided financial assistance to non-profit service agencies (Families Forward, South County Outreach) to purchase existing housing in the community for use as transitional/supportive and affordable housing. In addition, the City owns two condominium units which are leased to a non-profit agency (Families Forward) for transitional/supportive affordable housing (Madrid Condominiums). These facilities help to address the needs of very low- and extremely low-income persons. Specifically, the City provided CDBG funding to a non-profit organization (South County Outreach) to assist with the purchase and operation of eight condominium units for transitional/supportive and affordable housing. In addition, the Lake Forest Redevelopment Agency acquired a four-unit apartment, which was transferred to the Lake Forest Housing Authority, and subsequently sold to Families Forward (Saguaro Apartments). These units will continue to offer transitional/supportive and affordable housing to low-income residents through 2027–2031 (South County Outreach units), 2071 (Saguaro Apartments), and 2031 (expiration of Madrid Condominiums lease agreement with Families Forward). The City-owned units would likely continue to serve as affordable housing indefinitely, after the expiration of the current lease agreement.

Through the City's partnership with Families Forward and South County Outreach, supportive services are provided to residents that include weekly case management counseling, weekly budget and financial counseling, child care assistance to attend counseling, education supplies assistance, employment supplies and tools assistance, health care payment assistance, permanent housing placement assistance, legal assistance (as available), life-skills training, weekly children's program that addresses self-esteem, social skills, coping skills, values and beliefs, peer pressure, anger management, self-care, and identifying social networks.

Responsible Agencies: City of Lake Forest, City of Lake Forest Housing Authority

Funding Sources: CDBG

2021-2029 Objectives: Support non-profit organizations that provide affordable and transitional/supportive housing to individuals at risk for homelessness (subject to available funding and on a case-by-case basis)

Timeframe: Annual monitoring and reporting throughout the planning period through the Housing Element Annual Progress Report (APR)

Fair Housing Issues Addressed:

Fair Housing Enforcement and Outreach Capacity; Disparities in Access to Opportunity; Disproportionate Housing Needs, Including Displacement Risk

Contributing Factors Addressed:

Lack of Affordance, Integrated Housing for Individuals who need Supportive Services; Lack of Assistance for Transition from Institutional Settings to Integrated Housing; Lack of Effective Accommodations for Unhoused Persons with Disabilities

Program 11: Coordination with Social Service Agencies

A variety of social services agencies provide housing and supportive services to special needs groups in Lake Forest. Several of these social service agencies receive CDBG funds from the City to help administer these programs. The City determines its CDBG allocations to social service agencies annually based upon funding availability, applications received, whether the agency provides a priority need in the City's 5-year Consolidated Plan, past performance, if the agency meets Federal HUD regulations, and other criteria. In a typical program year, funding is allocated to nonprofits that serve the following needs of lower income individuals and households (i.e., those earning up to 80% AMI): food distribution, housing assistance, services and programs for the elderly and youth, services for the disabled (including developmentally disabled), primary health care services, and fair housing advocacy and counseling.

Similar to the Housing Element update, the Consolidated Plan involves comprehensive outreach, citizen participation workshops, and assessment of community needs to develop a road map for programs and activities to be pursued in the ensuing five years. The variety of social service agencies that may be awarded CDBG pass-through funds are guided by priority needs articulated in the Consolidated Plan. All CDBG-contracted and funded programs (emergency housing/shelter, food distribution, primary health care services to the indigent or non-insured, senior case-management services, and home-delivered meals) address and assist the needs of lower income persons and households of our community.

Responsible Agencies: City of Lake Forest

Funding Sources: CDBG

2021-2029 Objectives: Continue to evaluate requests on an annual basis for allocation of CDBG Funds to social service agencies to benefit Lake Forest residents

Timeframe: Annual monitoring and reporting throughout the planning period through the Housing Element Annual Progress Report (APR)

Fair Housing Issues
Addressed:

Outreach; Fair Housing Enforcement and Outreach Capacity; Disparities in
Access to Opportunity for Persons with Disabilities

Contributing Factors
Addressed:

Lack of a Variety of Media; Lack of Resources for Fair Housing Agencies and
Organizations

Program 12: California Accessibility Standards Compliance Program

The City will continue to ensure that all construction projects requiring building permits comply with [the applicable](#) State of California accessibility standards. The City will provide technical assistance as part of the building permit review process to assist property owners and contractors in understanding this law and related requirements applied to new development and/or retrofit or rehabilitation projects for public, residential, and commercial structures. The City will also provide a link on the City website to the Division of the State Architect's web page that provides various access compliance reference materials, including an advisory manual and answers to frequently asked questions.

Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
2021-2029 Objectives:	Assure housing units accommodate residents with disabilities.
Timeframe:	Ongoing implementation, updates to the City's website by February 15, 2022
Fair Housing Issues Addressed:	Disparities in Access to Opportunity for Persons with Disabilities
Contributing Factors Addressed:	Inaccessible Government Facilities or Services; Lack of Assistance for Housing Accessibility Modifications

Program 13: Density Bonus Implementation Program

The City will provide for density bonuses consistent with State law, including density bonuses and incentives for projects that contain 100% very low- and low-income units. The City will [annually](#) monitor State law updates which impact density bonuses and will update local plans and programs as necessary. [As part of the City's regular outreach to developers, the City will advertise the City's density bonus provisions and answer any questions on the program and its implementation.](#)

Responsible Agencies:	Community Development Department
Funding Sources:	General Fund and planning grants
2021-2029 Objectives:	Continue to implement density bonuses consistent with State law.
Timeframe:	Annual monitoring of relevant legislation; annual outreach to the development community; Ongoing ongoing implementation
Fair Housing Issues	Segregation and Integration; Racially and Ethnically Concentrated Areas of

Addressed: Poverty/Affluence; Disparities in Access to Opportunity Disproportionate Housing Needs, Including Displacement Risks; Site Inventory

Contributing Factors Lack of Community Revitalization Strategies; Lack of Private Investments in Specific Neighborhoods; Location and Type of Affordable Housing; Availability of Units in a Range of Sizes

CONSERVE THE EXISTING SUPPLY OF AFFORDABLE HOUSING (GOAL 2)

Market rents in Lake Forest are at a level which significantly limits the supply of housing affordable to very low-income households. Rental subsidies are necessary to prevent many of the City's very low-income residents from spending upwards of 30% of their incomes on housing costs, and over-extending themselves financially. In addition to rent subsidies, actions to preserve the low-income housing projects in Lake Forest at-risk of converting to market rate will be necessary to maintain their affordability and not reduce affordable housing units available in the community.

Program 14: Rental Assistance

The Federal Housing Choice Voucher rental assistance program offers rental subsidies to extremely low- and very low-income families (i.e., those earning up to 50% AMI) and elderly who spend more than 30% of their income on rent. The subsidy represents the difference between the excess of 30% of their monthly income and the actual rent. Rent subsidies can be used to pay for mobile home park space rents.

The City will work with the Orange County Housing Authority to promote the program in a bilingual way to all residents while placing an emphasis on the City's special needs populations, including persons with disabilities, female-headed households, seniors, and large families with the goal of assisting an average of approximately 190 extremely low- and very low-income households annually during the planning period. Through other programs included in the Housing Plan, the City will educate the community on the importance of integrating affordable housing throughout all geographic areas of the City to help create balanced and integrated neighborhoods.

Responsible Agencies: Orange County Housing Authority

Funding Sources: U.S. Department of Housing and Urban Development (HUD) Housing Choice Vouchers

2021-2029 Objectives: Promote the Housing Choice Vouchers program.

Timeframe: Ongoing implementation and annual monitoring throughout the planning period.

Fair Housing Issues Outreach; Disproportionate Housing Needs, Including Displacement Risks
Addressed:

Contributing Factors Lack of Variety of Media; Lack of Language Access; Lack of Accessible

Addressed:

Forums: Displacement of Residents due to Economic Pressures; Private Discrimination

Program 15: Conservation of Existing Affordable Units

In order to meet the housing needs of all economic groups in Lake Forest, the City must develop programs to minimize the loss of housing units available to lower-income households. As of June 2021, the City's affordable housing inventory consisted of 202 units, of which 811 were at risk of converting to market rate rents during the next 10 years.

The City will work with property owners, interest groups and the State and federal governments to conserve the City's affordable housing stock through implementation of the following programs:

- Monitor Units at Risk: Maintain contact with providers and owners to monitor the status of existing and future affordable units.
- Work with Owners: Provide technical assistance to owners of properties with at-risk units by identifying funding sources and supporting grant or tax credit applications for the extension of affordability covenants.
- Work with Potential Purchasers: Where feasible, provide technical assistance to public and non-profit agencies interested in purchasing and/or managing properties that include units at risk.
- Tenant Education: The California Legislature extended the noticing requirement of at-risk units opting out of low-income use restrictions to one year. Should a property owner pursue conversion of the units to market rate, the City will strive to ensure that tenants are properly noticed and informed of their rights and that they are eligible to receive Housing Choice vouchers that would enable them to stay in their units, should they receive one.
- Preservation: Coordinate with qualified entities to preserve and maintain affordability of units at-risk of converting to market rate uses.
- Noticing Requirements: Comply with noticing requirements within three years, twelve months, and six months of the affordability expiration date.

Responsible Agencies: City of Lake Forest Housing Authority; Orange County Housing Authority

Funding Sources: U.S. Department of Housing and Urban Development Section 8 Allocation;
Other funding sources as available

2021-2029 Objectives: Work with property owners, interest groups and the State and federal governments to conserve the City's affordable housing stock.

Timeframe: Ongoing implementation and annual monitoring and reporting throughout the planning period through the Housing Element Annual Progress Report (APR). Within 60 days of notice of intent to convert at-risk units to market rate rents, the City will work with potential purchasers using HCD's current list of Qualified Entities (<http://www.hcd.ca.gov/hpd/hrc/tech/presrv/>), and educate tenants of their rights, in collaboration with property owners.

Fair Housing Issues Addressed:

Outreach; Disproportionate Housing Needs, Including Displacement Risks; Site Inventory

Contributing Factors Addressed:

Lack of Local Public Fair Housing Enforcement; Lack of Tenant Protections; Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures

REHABILITATE THE CITY'S EXISTING SINGLE-FAMILY AND MULTI-FAMILY HOUSING STOCK (GOAL 2)

The majority of the City's housing stock is in good condition; however, it is important for the City to provide programs that ensure the continued maintenance of its housing stock. The City utilizes CDBG funds to operate a single-family housing (attached and detached and mobile homes) rehabilitation loan program for low- to moderate income households, and promotes improvements through its code enforcement and targeted Neighborhood Preservation programs Citywide.

Program 16: Housing Rehabilitation Loan Program

Subject to the availability of funding and annual City Council approval, the City provides housing rehabilitation assistance to low- to moderate-income homeowners through a loan program for owner-occupied single-family detached and attached homes and mobile home units, which is funded through the City's CDBG program. A zero-interest deferred payment loan of up to \$30,000 is available to conventional single-family residence households earning up to 80% AMI. A 3% interest loan amortized for a 15-year period is available to those who wish to pay off their loan sooner. Loans of up to \$15,000 are available to owners of mobile homes. Eligible repairs include roofing, windows, exterior and interior painting, plumbing, electrical, energy/weatherization, garage doors, and other common home repairs, as well as accessibility improvements.

The City promotes its owner-occupied Housing Rehabilitation Loan Program on a year-round basis on its website and in the City's quarterly newsletter. The loan program is only available for owner-occupied single-family homes, both attached and detached, and mobile homes.

Responsible Agencies: Community Development Department

Funding Sources: CDBG

2021-2029 Objectives: Assist 10 lower-income homeowners annually through the Housing Rehabilitation Loan Program.

Timeframe: Annual allocation of CDBG funds through the CDBG Action Plan process, and annual monitoring and reporting through the City's (HUD required) Consolidated Annual Performance Evaluation Report (CAPER) process throughout the planning period.

Fair Housing Issues Addressed: Segregation and Integration; Racially and Ethnically Concentrated Areas of Poverty; Disparities and Access to Opportunity; Disproportionate Housing Needs, Including Displacement Risks

Contributing Factors Addressed: Lack of Public Investment in Specific Neighborhoods; Lack of Community Revitalization Strategies; Deteriorated and Abandoned Properties

Program 17: Code Enforcement and Neighborhood Preservation

The Code Enforcement and Neighborhood Preservation program implements a comprehensive approach to neighborhood improvement. Community Development Department inspectors respond to complaints related to substandard housing, property maintenance, overgrown vegetation, trash and debris, illegal conversions, improper occupancy and other nuisance and zoning complaints. For over two decades, the City has allocated CDBG funds annually to the Neighborhood Pride Paint Program. As funding permits, the City will continue sponsoring similar neighborhood preservation and revitalization events during the planning period. Code enforcement staff will also continue to inform eligible owners about the City's housing rehabilitation loan and paint programs.

Responsible Agencies: Community Development Department

Funding Sources: CDBG and General Fund

2021-2029 Objectives: Continue to enforce applicable sections of the Lake Forest Municipal Code, including the California Building Code

Timeframe: Ongoing implementation and reporting throughout the planning period through the Housing Element Annual Progress Report (APR).

Fair Housing Issues Addressed: Segregation and Integration; Racially and Ethnically Concentrated Areas of Poverty; Disparities and Access to Opportunity; Disproportionate Housing Needs, Including Displacement Risks

Contributing Factors Addressed: Lack of Public Investment in Specific Neighborhoods; Lack of Community Revitalization Strategies; Deteriorated and Abandoned Properties

Program 18: Energy Conservation and Energy Efficiency Opportunities

The City will continue to implement energy-efficient standards for new construction and rehabilitation projects, including the California Green Building Standards Code. Information regarding the City's energy-efficiency standards and available programs to assist homeowners and property owners, including those identified in the Housing Element Background Report, will be made available on the City's website and at the permit counter [in English and Spanish](#). In addition to promoting the programs Citywide, the City will target special advertisements and education to the City's lower-income census tracts to explain available programs and potential long-term utility cost savings. The City will review the General Plan to determine if updates are needed to support and encourage energy efficiency in existing and new housing, especially in areas of the City with lower CalEnviroScreen scores which may suffer from elevated levels of environmental burdens. If updates are necessary, amend the General Plan to support this program.

Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
2021-2029 Objectives:	Improve energy-efficiency in new and existing development and promote available programs and benefits to all City residents, especially lower-income residents.
Timeframe:	Ongoing implementation; review the General Plan to determine if updates are appropriate no later than December 1, 2022 and complete updates, if needed, no later than December 1, 2023.

[Fair Housing Issues](#)

[Outreach](#)

[Addressed:](#)

[Contributing Factors](#)

[Lack of Variety of Media; Lack of Language Access](#)

[Addressed:](#)

Program 19: Lead Based Paint Education and Reduction Program

Lead based paint was used commonly in the United States in homes built prior to 1978. When properly maintained and managed, this paint poses little risk. However, due to exposure to lead-based paint hazards, people of all ages (and especially children), can have blood-lead levels above safe limits. Lead poisoning can cause permanent damage to the brain and many other organs and causes reduced intelligence and behavioral problems. To protect families from exposure to lead from paint, dust, and soil, Congress passed the Residential Lead Based Paint Hazard Reduction Act of 1992, also known as Title X. Section 1018 of this law directed HUD and EPA to require the disclosure of known information on lead-based paint and lead-based paint hazards before the sale or lease of most housing built before 1978.

While the majority of Lake Forest's housing stock was built after 1978, exposure to lead-based paint hazards continues to impact the community. Occupants of the City's older homes tend to be some of the City's more vulnerable special needs populations, including seniors and lower-income households.

The City is committed to helping minimize the risk of lead poisoning and will educate the community on issues regarding lead-based paint hazards and resources available to remove this hazard from their home. The City will identify neighborhoods with homes that were built before 1978 and target education directly to these homeowners via programs such as direct mailers or geographic-based social media posts. Issues related to lead based paint are most likely to be concentrated in the City's older neighborhoods, specifically Southwest Lake Forest. Efforts to improve the quality of life and living conditions for Southwest Lake Forest residents are described in detail as part of Program 24, Neighborhood Improvement Task Force. Information will be provided in English and Spanish.

Responsible Agencies:	Community Development Department
Funding Sources:	Grant Funding
2021-2029 Objectives:	Educate the community on issues regarding lead-based paint hazards.
Timeframe:	Annual monitoring and reporting throughout the planning period through the Housing Element Annual Progress Report (APR).

Fair Housing Issues
Addressed:

Outreach

Contributing Factors
Addressed:

Lack of Variety of Media; Lack of Language Access

PROVIDE HOUSING OPPORTUNITIES FOR FIRST-TIME HOMEBUYERS (GOAL 3)

Home ownership in Orange County is increasingly unaffordable to lower- and moderate-income residents. Due to the high cost of housing in Lake Forest, first-time home buyer programs are cost-prohibitive for the City without a County or other complementary program.

Program 20: Homebuyer Assistance Programs

The City has identified a goal of assisting five households to achieve home ownership annually during the planning period. The Mortgage Credit Certificate (MCC) Program, administered by the County of Orange, enables lower- and moderate-income first-time homebuyers to receive a federal income tax credit of up to 15% of the annual mortgage interest paid. The MCC reduces federal income tax, increases take-home pay, and increases the qualifying loan amount for homebuyers. Program assistance is available only to income-eligible persons and families who have not owned a home in the last three years. The property must be a single-family detached home, condominium, or

townhouse. Although the program currently applies only to census tracts outside of Lake Forest, the City will continue to monitor the program for any future applicability to Lake Forest households and notify eligible applicants, as feasible.

The Southern California Housing Finance Agency (SCHFA) raises funds for mortgage financing through the sale of tax-exempt revenue bonds. The City cooperates with lenders and the County in advertising the availability of the SCHFA program, including advertisements on the City's website.

Responsible Agencies:	County of Orange
Funding Sources:	Federal tax credits; mortgage revenue bonds
2021-2029 Objectives:	Continue to promote the homebuyer assistance programs; <u>assist five households annually (as funding is available).</u>
Timeframe:	Ongoing implementation and reporting throughout the planning period through the Housing Element Annual Progress Report (APR).
<u>Fair Housing Issues Addressed:</u>	<u>Disparities in Access to Opportunity; Disproportionate Housing Needs, Including Displacement Risks</u>
<u>Contributing Factors Addressed:</u>	<u>Access to Financial Services; Displacement of Residents Due to Economic Pressures; Lending Discrimination</u>

EQUAL HOUSING OPPORTUNITY (GOAL 4)

Program 21: Fair Housing Services

Lake Forest currently contracts with the Fair Housing Council of Orange County (FHCOOC) for the provision of fair housing services, and the City will continue to contract with a fair housing service provider to provide fair housing services for the duration of the planning period. Services offered include bilingual fair housing enforcement and education, landlord/tenant counseling, mediation and homebuyer HUD counseling which includes first-time homebuyer education and mortgage default counseling.

The City monitors and attempts to minimize discriminatory housing practices with the assistance of the FHCOOC. Funding to FHCOOC is provided annually from the City's CDBG funding allocation. Fair Housing actively counsels residents on landlord/tenant issues to help minimize discriminatory housing acquisition policies and practices. In addition to providing educational workshops to our residents, the organization advocates fair housing rights on behalf of residents. The City will continue to maintain the link on the City's website providing information about fair housing services. The City will also work with its fair housing service provider to identify any specific geographic areas in the City which have higher levels of discrimination claims and will target outreach and education to these areas.

To help address fair housing issues at local and regional levels, the City will continue efforts to mitigate impediments identified in the Regional Analysis of Impediments to Fair Housing Choice.

Responsible Agencies:	City of Lake Forest; fair housing service provider
Funding Sources:	CDBG
2021-2029 Objectives:	Support fair housing service providers and efforts to minimize discriminatory housing practices.
Timeframe:	Annual allocation of funds to fair housing service provider. Annual monitoring and reporting throughout the planning period through the Housing Element Annual Progress Report (APR) and CDBG CAPER.

Fair Housing Issues

Addressed:

Outreach; Fair Housing Enforcement and Outreach Capacity

Contributing Factors

Addressed:

Lack of Language Access; Lack of Accessible Forums; Lack of Resources for Fair Housing Agencies and Organizations

Program 22: Affirmatively Furthering Fair Housing ~~Outreach and Coordination~~ Program

Facilitate equal and fair housing opportunities by implementing actions to affirmatively further fair housing and opportunities for all persons regardless of race, religion, sex, age, marital or familial status, ancestry, national origin, color, disability, or other protected characteristics through provision of information, coordination, and education on fair housing law and practices to residents, landlords, and housing developers. This program addresses the fair housing issues of education and outreach, integration/segregation, and access to opportunity. Efforts will begin immediately and may include, but not be limited to:

~~Education and~~ Outreach

- ~~• Provide public information and brochures regarding fair housing/equal housing opportunity requirements including how to file a complaint and access the investigation and enforcement activities of the State Fair Employment and Housing Commission. This information will be made available on the City's website and at City Hall. This information will be reviewed annually to ensure that any materials, links, and information provided are current.~~
- City staff will serve as liaison between the public and appropriate agencies in matters concerning housing discrimination within the City. The City will refer discrimination complaints to the City's fair housing services provider.

- ~~• Provide annual training of City staff, including through coordination with local advocacy groups or fair housing services provider, on how to receive, log, refer, and follow-up on fair housing complaints. If resolution was not obtained for any complaints, refer complaint to HCD to ensure that affordable housing laws are actively enforced.~~
- ~~• Provide a bi-biennial fair housing update to the City Council.~~
- Provide annual public service announcements, through coordination with HCD, via various media (e.g., newspaper ads, public service announcements at local radio and television channels, the City's website, or the City's social media accounts).
- Provide fair housing literature to schools, libraries, and post offices. This information is available via the City's fair housing service provider and will be reviewed annually to ensure that the posters and literature being provided are up-to-date.

Fair Housing Enforcement and Outreach Capacity

- ~~• Provide public information and brochures regarding fair housing/equal housing opportunity requirements including how to file a complaint and access the investigation and enforcement activities of the State Fair Employment and Housing Commission. This information will be made available on the City's website and at City Hall. This information will be reviewed annually to ensure that any materials, links, and information provided are current.~~
- ~~• Provide annual training of City staff, including through coordination with local advocacy groups or fair housing services provider, on how to receive, log, refer, and follow-up on fair housing complaints. If resolution was not obtained for any complaints, refer complaint to HCD to ensure that affordable housing laws are actively enforced.~~
- Provide a bi-biennial fair housing update to the City Council.

Integration/Segregation and Integration

- Coordinate with local organizations, through Community Action Agency, Continuum of Care, and Housing Authority efforts, to encourage, expand, and publicize fair housing requirements as part of programs that provide rental assistance to lower income households.
- On an ongoing basis, and at least annually, review land use and planning proposals, including development proposals, general plan amendments, master planning efforts for parks, recreation, infrastructure, and other facilities and amenities, to ensure that the City is replacing segregated living patterns with integrated and balanced living patterns, where applicable and feasible, and work to transform racially and ethnically concentrated areas of poverty into areas of opportunity without displacement.

Racially and Ethnically Concentrated Areas of Poverty or Affluence

- Implement Program 1: Land Use Policy, Entitlements, and Development Capacity (Shortfall Program), to

allow for new development and investment in areas of lower household incomes (Southwest Lake Forest) and Affluence (Foothill Ranch)

- Implement Program 8: Accessory Dwelling Units, to actively educate homeowners associations in areas of affluence about the potential for development of ADU to meet the needs of lower income households
- Implement Program 16: Housing Rehabilitation Loan Program, to support households in need of rehabilitation assistance, which are most likely to be located in areas of lower household income
- Implement Program 24: Neighborhood Improvement Task Force, to study the needs of the City's lower-income and racially-segregated neighborhoods and identify, fund, and implement improvements to address the needs identified

Disparities in Access to Opportunity

- Provide assistance to aid alleged victims of violence or discrimination in obtaining access to appropriate State or federal agency programs.
- On an ongoing basis, actively recruit residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies as positions are made available due to the regular appointment process or vacancies.
- On an annual basis, provide education to the community on the importance of participating in the planning and decision-making process and completing Census questionnaires.

Disparities in Access to Opportunity for Persons with Disabilities

- Implement Program 1: Land Use Policy, Entitlements, and Development Capacity (Shortfall Program), to rezone sites adjacent to transit corridors and activity centers to allow for higher density residential development, suitable for affordable and special needs housing, including new opportunities for persons with disabilities
- Implement Program 5: Facilitate Affordable and Special Needs Housing Construction, whereby the City will proactively reach out to developers of housing for special needs populations to share details about special needs groups in Lake Forest and promote the development of housing for special needs groups in areas of moderate and high levels of opportunity
- Implement Program 6: Monitor and Implement Changes in Federal and State Housing, Planning, and Zoning Laws to proactively identify changes in Federal and/or State regulations required to be implemented at the local level in order to improve access to opportunity for persons with disabilities

Disproportionate Housing Needs, Including Displacement Risks

- Implement Program 4: Replacement of Affordable Units, to ensure that affordable units that are removed from the City's housing stock are replaced in accordance with State law
- Implement Program 5: Facilitate Affordable and Special Needs Housing Construction, to encourage the

development of housing units to serve the needs of larger households, including large extremely low income households

- Implement Program 23: Economic Displacement Risk Analysis, to proactively identify potential issues related to economic displacement as a result of new development

Site Inventory

- Implement Program 1: Land Use Policy, Entitlements, and Development Capacity (Shortfall Program), to rezone sites to accommodate new residential and mixed-use development at densities consistent with the City's General Plan (adopted in 2020) to meet the City's RHNA at all income levels and ensure that the distribution of sites throughout the community is consistent with the City's duty to affirmatively further fair housing
- Implement Program 2: Monitor Residential Capacity (No Net Loss), to ensure that replacement sites identified to continue to accommodate the City's remaining RHNA throughout the planning period are consistent with the City's duty to affirmatively further fair housing

Responsible Agencies: Community Development Department

Funding Sources: General Fund

2021-2029 Objectives: Facilitate equal and fair housing opportunities by implementing actions to affirmatively further fair housing and opportunities for all persons regardless of race, religion, sex, age, marital or familial status, ancestry, national origin, color, disability, or other protected characteristics through provision of information, coordination, and education on fair housing law and practices to residents, landlords, and housing developers.

Timeframe: Ongoing outreach and coordination, beginning immediately; annual review of fair housing educational information to ensure that the most recent information provided by the City's fair housing service provider is being disseminated; annual presentations and media outreach.

Fair Housing Issues Addressed: Outreach; Fair Housing Enforcement and Outreach Capacity; Segregation and Integration; Racially and Ethnically Concentrated Areas of Poverty/Affluence; Disparities in Access to Opportunity; Disparities in Access to Opportunity for Persons with Disabilities; Disproportionate Housing Needs, Including Displacement Risks; Site Inventory

Contributing Factors Addressed: All

Program 23: Economic Displacement Risk Analysis

Economic displacement can occur when new development, particularly residential development, changes the market conditions in an existing area so much that current residents can no longer afford to live there. The City of Lake Forest can reduce the impact of economic displacement when it occurs by preventing practices that increase or enable displacement. To determine if market-force economic displacement is occurring due to development of new housing, increased housing costs, or other factors, the City will conduct an analysis to determine if individuals and families may be displaced as a result of new residential development in the City's mixed-use areas. The analysis will consider gentrification locally and will assess how new development and community investments may potentially influence displacement. If this study shows that displacement is expected as a result of new development in the City's mixed-use areas, the City will develop an action program based on the identified causes of displacement, including specific actions to monitor and mitigate displacement. Annual review of the action program may result in modifications to further reduce displacement risk. This program addresses the fair housing issue of disproportionate housing needs, including displacement risk.

Responsible Agencies:	Community Development Department
Funding Sources:	Grant Funding; General Fund
2021-2029 Objectives:	Understand the potential for market-force economic displacement and consider programs to address the issue, if necessary.
Timeframe:	Conduct analysis by December 31, 2022 and establish resulting programs (if any) by December 31, 2023. Ongoing implementation and reporting throughout the planning period through the Housing Element Annual Progress Report (APR).

Fair Housing Issues
Addressed:

Disproportionate Housing Needs, Including Displacement Risks

Contributing Factors
Addressed:

Displacement of residents due to economic pressures

Program 24: Neighborhood Improvement Task Force

The City of Lake Forest has created a new Neighborhood Improvement Task Force (NITF) made up of key City personnel, police services staff, and other agency representatives to address neighborhood-specific issues in the community's older residential neighborhoods. This effort is led out of the City Manager's Office. Programs recommended by the NITF will be a key tool the City will use to address fair housing issues and affirmatively further fair housing. For example, the City expects to host a workshop to attract developers and work with the Fair Housing representatives and residents of study areas to inform them of their rights under State law.

As analyzed in the Affirmatively Furthering Fair Housing section of the Housing Element Background Report, the City has identified the area of Southwest Lake Forest as an area in need of focused attention and investment. These findings are consistent with the City's ongoing work to improve existing neighborhoods in Lake Forest, to maintain the quality of the City's existing housing stock, support current residents, and address several fair housing issues and contributing factors, including access to opportunity, displacement of residents due to economic pressures, and community opposition (see the discussion on Fair Housing Issues and Contributing Factors in Section 6 of the Background Report).

In July 2021, the City initiated preparation of a Neighborhood Improvement Needs Assessment for Southwest Lake Forest, the first neighborhood identified to receive the focused attention of the NITF. This area encompassed a high "calls for service" area where citizens had expressed concern about safety issues and a lack of City services as part of a bi-annual City survey (the City's fair housing analysis conducted as part of its 2021-2029 Housing Element Update validated these findings).

The Neighborhood Improvement Needs Assessment for Southwest Lake Forest included conducting an initial communications assessment and audit of the City's existing communications, community ascertainment studies, and translating the collected data into actionable public policy recommendations. The Needs Assessment documents quality of life issues impacting the neighborhood and provides key recommendations for the NITF's review and action. At the conclusion of the evaluation team's assessments, they identified specific issues and areas in need of improvement. These improvements included traffic, lighting, parking, noise, crime, issues related to homelessness, infrastructure repairs, property maintenance, disposal of bulky items, street sweeping, trash, beautification, and a need for parks within walking distance.

In late 2021, the City's consultant for the Neighborhood Improvement Needs Assessment prepared a draft of recommended improvements and programs based on the list of concerns identified for the project area. In January of 2022, staff will provide a presentation to the City Council as part of the City's Strategic Plan update. This list will include the consultants recommendations and may identify specific programs from the recommended list to implement. While the exact recommendations are still under consideration, the City has committed \$70,500 as part of the City's two-year 2021-2023 Operating Budget to implement programs and improvements serving the Southwest Lake Forest neighborhood.

The City intends to continue the program by working with the community and the NITF to identify other target neighborhoods which could benefit from a Neighborhood Improvement Needs Assessment. The City will identify a list of recommended improvements for each target neighborhood for inclusion in the capital improvement plan (CIP) budget to address the unique needs of each of Lake Forest's target neighborhoods.

As part of this process, the NITF will consider the contributing factors to fair housing issues identified in the Housing Element, the Orange County Analysis of Impediments to Fair Housing, and information from the City's fair housing service providers. This information will be considered as part of the Council's evaluation of recommended actions to ensure that those actions selected address the contributing factors identified for Lake Forest and work to affirmatively

further fair housing practices in the City.

Responsible Agencies: City Manager's Office

Funding Sources: Grant Funding; General Fund

2021-2029 Objectives: Improve the Southwest Lake Forest neighborhood through implementation of the recommendations of the Neighborhood Improvement Plan.

Timeframe: Identification of improvements to implement in 2022; implementation of improvements from 2022-2023; assessment of need for future neighborhood project by January 2023.

4 Quantified Objectives

State law requires the Housing Element to include quantified objectives for the maximum number of units that can be constructed, rehabilitated or conserved. Policies and programs in the Housing Element establish the strategies to achieve these objectives. The City's quantified objectives are described under each program, and represent the City's best effort in implementing each of the programs. Assumptions are based on past program performance and funding availability, construction trends, land availability, and future programs that will enhance program effectiveness and achieve full implementation of the City's housing goals.

The new construction objectives shown in the table are based on the City's RHNA for the 2021-2029 planning period for very low-, low- and moderate-income housing, historic trends, and expectations for new ADUs. Rehabilitation and conservation objectives are based on specific program targets, including such programs as use of the City's Housing Rehab Loan Program and Housing Choice Voucher program rental housing vouchers.

The table below summarizes the City's quantified objectives for housing during the 2021-2029 planning period.

Table 1: Quantified Objectives 2021-2029

Income Category	New Construction	Rehabilitation	Conservation/Preservation
Extremely Low	70	324	<u>202</u>
Very Low	70	324	<u>(311 at-risk for conversion during the next 10 years and 191 not at-risk during the next 10 years)</u>
Low	163	216	
Moderate	167	216	<u>29,800*=</u>
Above Moderate	1,178	--	<u>=</u>
Totals	1,648	1080	<u>311</u>

* It is the City's objective to promote the conservation/preservation of the City's *entire* existing housing stock.



PART 2: BACKGROUND REPORT

Adopted
January 2022

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1. Introduction

The City of Lake Forest is located in southern Orange County, nestled within Saddleback Valley, southwest of the Santa Ana Mountains. Lake Forest is bordered by the cities of Irvine and Mission Viejo, and is within 7 miles (northeast) of the Pacific Ocean. Interstate 5, 405 Freeway, and California State Route 241 provide regional access. Lake Forest has a population of 84,711 (Department of Finance, 2020) and is approximately 16.6 square miles in size. The City incorporated in 1991 and expanded its city limits in 2000 to include the master planned developments of Foothill Ranch and Portola Hills. Although Lake Forest is a relatively new city, the community has a rich history dating back to the mid-1800s.

Lake Forest has the feel of a small community, but with the amenities of a large city. The City provides a diverse range of employment, lifestyle, and housing opportunities, all complemented by the surrounding natural environment. As such, the community has become a desirable place to live, offering lake-front homes, condominiums, town homes, mobile home parks, retirement communities, and affordable housing. Lake Forest's family-oriented atmosphere is especially appealing to those with younger children. The City is served by quality public schools for grades K-12, several preschools, and private elementary schools.

State Housing Law (Government Code Section 65583) states that a "housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, and mobile homes, and shall make adequate provision for the existing and projected needs of all economic segments of the community." This Background Report is an update of the City's 2013 Housing Element (5th Cycle), adopted in January 2014.

The assessment and inventory must include all of the following:

- Analysis of population and employment trends, documentation of projections, and a quantification of the locality's existing and projected housing needs for all income levels. Such existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584 of the Government Code.
- Analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition.
- An inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship between zoning, public facilities, and city services to these sites.
- Analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development.
- Analysis of potential and actual non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, requests to develop housing at densities below the minimum densities in the inventory of sites, and the length of time between receiving approval for a housing development and submittal of an application for building permits that hinder the construction of a locality's share of the regional housing need.

- Analysis of any special housing needs, such as those of the elderly, disabled (including developmentally disabled), large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter.
- Analysis of opportunities for energy conservation with respect to residential development.
- Analysis of existing assisted multifamily rental housing developments that are eligible to change from low-income housing to market-rate during the next 10 years.

The Background Report of this Housing Element identifies the nature and extent of Lake Forest's housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, and energy conservation opportunities. By examining the City's housing needs, resources, and constraints, the City can determine a plan of action for providing adequate housing. This plan is presented in the Housing Plan, which is the policy component of the Housing Element. In addition to identifying housing needs, this Background Report also presents information regarding the setting in which these needs occur. This information is instrumental in providing a better understanding of the community, which in turn is essential for the planning of future housing needs.

Since the update of the City's prior Housing Element in 2014, statutory changes have occurred that must be included in the 2021-2029 Lake Forest Housing Element. These laws have been incorporated in the appropriate sections throughout this Background Report as well as in its accompanying Policy Document.

2. Accomplishments Under 5th Cycle Housing Element

The following section reviews and evaluates the City's progress in implementing the 2013 Housing Element. It reviews the results and effectiveness of programs, policies, and objectives from the previous Housing Element planning period, which covered 2013 through 2021. This section also analyzes the difference between projected housing need and actual housing production.

2A. Review of 2013 Housing Element

The 2013 Housing Element program strategy focused on the implementation of policies and programs to ensure adequate housing sites, encourage the production of new housing, including affordable and special needs housing, encourage the maintenance and preservation of existing housing, remove various constraints to housing, including housing for special needs populations, and encourage fair housing and non-discrimination. The 2013 Housing Element identified the following goals:

ISSUE 1 – HOUSING DIVERSITY AND OPPORTUNITIES

GOAL 1.0: Adequate housing to meet the existing and future needs of Lake Forest residents.

ISSUE 2 – MAINTENANCE, PRESERVATION, AND CONSERVATION OF HOUSING

GOAL 2.0: Maintenance and enhancement of the quality of existing residential neighborhoods.

ISSUE 3 – HOME OWNERSHIP

GOAL 3.0: Increased opportunities for home ownership.

ISSUE 4 – EQUAL OPPORTUNITY

GOAL 4.0: Promote equal opportunity for all residents to reside in housing of their choice.

2B. Housing Production During 5th Cycle RHNA Period

The City's 5th Cycle Housing Element specifically addressed housing needs for Lake Forest from October 15, 2013 through October 15, 2021, in line with the Regional Housing Needs Assessment (RHNA) planning period adopted by the Southern California Association of Governments (SCAG). It should be noted that although the planning period was from October 15, 2013 through October 15, 2021, the RHNA period (identified by HCD for purposes of projecting housing needs and establishing the City's RHNA allocation), actually began on January 1, 2014.

Table 1 shows the total number of building permits issued by the City during the 5th RHNA Cycle based on the City's 2020 Housing Element Annual Progress Report and compares this number with the units required to be accommodated pursuant to the City's RHNA allocation. Housing development in the City increased significantly since the 4th Cycle, with the City exceeding its overall RHNA allocation by almost 1,000 units (*Note: Although the total number of units permitted exceeded the total RHNA allocation, the new units were largely in the above-moderate income category, as shown in Table 1*).

During the 2013-2021 RHNA period, the City issued 3,650 building permits; this included 32 deed-restricted very low-income units, 25 deed-restricted low-income units, 205 market-rate units affordable to moderate-income households, and 3,388 units affordable to above moderate-income households.

TABLE 1: REGIONAL HOUSING NEEDS ALLOCATION – 5TH CYCLE PROGRESS

Status	Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	647	450	497	1,133	2,727
Permits Issued	32	25	205	3,388	3,650
<i>Remaining Allocation</i>	<i>615</i>	<i>425</i>	<i>292</i>	<i>0</i>	<i>1,332</i>

Sources: City of Lake Forest 2013 Housing Element; 2020 General Plan Annual Progress Report

2C. Appropriateness and Effectiveness of 2013 Housing Element

While the majority of goals, policies, and programs included in the 2013 Housing Element continue to be appropriate to address the City's housing needs, the Housing Plan has been updated to provide clearer guidance to encourage affordable and special needs housing production. The Housing Plan was also updated to streamline programs and facilitate implementation, and to include a matrix that makes it easier to identify the applicability and timing of programs. In order to facilitate implementation of the Housing Plan and tracking of programs, the housing programs are presented in a user-friendly table.

As part of its Housing Element update effort, the City carefully evaluated the effectiveness of its existing housing programs, as discussed in Table 2. Based on this evaluation and community input, the City has found that most of the housing programs in the 2013 Housing Element have been effective and will be included in the 2040 Housing Plan, with revisions to address specific housing needs, constraints, or other concerns identified as part of this update, and to affirmatively further fair housing. The City implemented many of the housing programs in prior years and anticipates that the revisions included in the Housing Program will further encourage affordable and special needs housing production.

Since adoption of the prior Housing Element in 2014, the City has used CDBG funds for housing rehabilitation programs, and to provide fair housing services and services to special needs and at-risk populations (homeless, persons at risk of homelessness).

Due to the limited amount of funds available on an annual basis to substantially subsidize a rental or ownership housing development, it can require several years of accrued funds to assist a single project. Nonetheless, the City partnered with an affordable housing developer during the planning period (2020) to develop an affordable housing project (scheduled to break ground in 2021).

The Housing Plan included in this 2021-2029 Housing Element includes modifications to make programs more effective, clarify objectives, and ensure that the programs are implementable. See the Housing Plan for the goals, policies, and programs of this Housing Element.

While the City took several significant steps to promote housing during the prior planning period, the experience of Lake Forest and other communities throughout the state demonstrates that it is very difficult for local governments to meet their fair share housing goals for lower and moderate-income housing (i.e., the RHNA allocation). All cities, including Lake Forest, have limited financial and staffing resources and require substantial state and/or federal assistance, which has not been available at the levels necessary to support the City's housing needs, or for-profit and non-profit housing developers and agencies. As discussed below, the City has evaluated the success of existing programs to support the development of affordable housing, and has added new programs to the Housing Plan to address this objective. .

TABLE 2: EVALUATION OF THE 2013 HOUSING PROGRAMS

Program	Accomplishments
PROVISION OF ADEQUATE HOUSING SITES TO ACHIEVE A VARIETY OF HOUSING TYPES AND DENSITIES	
<p>Program 1: Land Use Policy, Entitlements, and Development Capacity: Planning and regulatory actions to achieve adequate housing sites are implemented through the Land Use Element, Zoning Code, and implementation of existing development agreements. These regulatory documents provide for a variety of residential types, ranging from lower-density single-family homes to higher-density apartments, condominiums, and mixed-use development.</p> <p>Lake Forest's residential sites inventory consists of over 600 acres of developable land with the capacity to yield nearly 3,900 new units during the planning period. As noted in Section III, these sites are adequate to meet the City's share of regional housing needs for the 2013-2021 RHNA period.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> Maintain and monitor the residential sites inventory to ensure adequate sites remain to accommodate the RHNA throughout the RHNA period. Receive and process development applications for projects within the New Neighborhoods. 	<p>Result/Evaluation: Program considered successful. The City has maintained an inventory of residential sites and has adequate capacity to accommodate its RHNA. However, changing circumstances will necessitate program modifications.</p> <p>The City prepares a General Plan Annual Progress Report ("APR") annually, to monitor progress towards its RHNA allocation. The 2020 APR reported that 3,650 dwelling units were permitted during the 2013-2021 planning period.</p> <p>Continue/Modify/Delete: Modify. This program provides relevant information to ensure the City is able to accommodate its RHNA allocation. However, given the increase in the City's RHNA allocation from 2,727 units (5th Cycle) to 3,228 units (6th Cycle), a more robust program will be implemented that includes the following:</p> <ul style="list-style-type: none"> Monitor and report housing production annually and revise development standards as necessary. Promote the construction of accessory dwelling units ("ADUs") by ensuring that ADUs are permitted by-right if they comply with Section 9.146.050 of the LFMC and State law, and continuing to streamline ADU approvals. Inform developers of sites appropriate for multi-family and special-needs housing.
<p>Program 2: Monitor Residential Capacity (No Net Loss): Monitor the consumption of residential acreage to ensure an adequate inventory is available to meet the City's RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify and, if necessary, rezone sufficient sites to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> Develop and implement a formal evaluation procedure pursuant to Government Code Section 65863 by January 1, 2014. 	<p>Result/Evaluation: The City has developed a project-based annual monitoring and tracking tool to ensure that adequate inventory is available to meet the City's RHNA obligations.</p> <p>Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>

Program 3: Facilitate Affordable Housing Production:

Affordable housing developments face a number of hurdles, including financing, development codes and standards, and in some cases, public opposition. Dissolution of the City's Redevelopment Agency by the State in 2012 eliminated the Low and Moderate Income Housing Fund (LMIHF), formerly the City's primary mechanism for providing direct funding support of affordable housing development. Continuing reductions in federal funding of HUD programs (e.g., CDBG) will constrain the City's ability to offer committed funding assistance to future affordable housing even further. The City can encourage and facilitate affordable housing through financial assistance, removal of regulatory constraints, and administrative support. With limited funding, the City will rely on the following actions to encourage affordable housing production during the planning period:

- Affordable Housing Implementation Plans (AHIPs):
- Collaborate with Affordable Housing Developers
- Regulatory Concessions and Incentive:

Program Objectives:

- Maintain contact information for affordable housing developers for the purposes of soliciting their involvement in development projects in Lake Forest. Participate with affordable housing developers to review available federal and State financing subsidies and apply as feasible on an annual basis. Assist and support developers of housing for lower-income households, especially housing for extremely low-income households, with site identification, supporting applications, conducting pre-application meetings, assisting with design and site requirements, and providing State-mandated regulatory incentives and concessions. Monitor and enforce AHIP provisions and collaborate with developers of affordable housing over the planning period to facilitate the construction of 250 affordable units over the planning period (10 extremely low-income, 40 very low-income, and 200 low-income units).

Result/Evaluation: Program considered successful. The City entered into an Exclusive Negotiation Agreement with National Community Renaissance ("National CORE") in 2017 for an affordable housing development. Project financing combines the City's \$3.7 million in affordable housing developer in-lieu fees with tax credits, debt financing, loans, and other available financial sources. National CORE submitted an application for a 71-unit project on 3.97 acres in December 2019. The project includes 70 units affordable to households earning less than 60% of the Area Median Income, with 12 units set aside for Permanent Supportive Housing, and 1 caretaker's unit. The project was approved on August 18, 2020 and construction is expected to begin in 2021.

The City continues to monitor and enforce approved AHIPs and affordable housing covenants, and maintains a qualified staff ready and willing to assist affordable housing developers with site identification, regulatory compliance and fast-track application processing.

Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.

REMOVAL OF GOVERNMENTAL CONSTRAINTS	
<p>Program 4: Farm Employee Housing: The City's Zoning Code includes two districts that allow agricultural uses (A-1 and OS). Commercial agriculture is permitted by right in the A1 zone and with approval of a Site Development Permit in the OS zone. Pursuant to the California Employee Housing Act, facilities with up to 36 beds or 12 units to board farm workers must be treated as accessory or incidental to agriculture operations. State law also provides that employee housing occupied by six (6) or fewer employees in a single family structure, shall be treated the same as a family dwelling of the same type in the same zone. The City will evaluate provisions for commercial agriculture operations in the A-1 and OS zones (and the related farm worker housing issues) and revise the Zoning Code to address compliance with Sections 17021.5 and 17021.6 of the Health and Safety Code.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> Review and revise the Zoning Code to address compliance with Health and Safety Code Sections 17021.5 and 17021.6. 	<p>Result/Evaluation: Program considered successful. Zone Change 12-14-4673 was approved on June 16, 2015, which added a definition for "agricultural employee quarters" as well as allowing such housing by right within the City's Agricultural and Open Space zones.</p> <p>Continue/Modify/Delete: Delete. Program no longer necessary and is not included in the 2021-2029 Housing Element.</p>
<p>Program 5: Monitor Changes in Federal and State Housing, Planning, and Zoning Laws: Although the 2013 Housing Element update did not identify any significant governmental constraints to the development or maintenance of housing in Lake Forest, the City will continue to monitor its development process and zoning regulations to identify and remove constraints to the development of housing. The City will also continue to monitor federal and State legislation that could impact housing and comment on, support, or oppose proposed changes or additions to existing legislation, as well as support new legislation when appropriate. Special attention will be given by the City in the minimizing of governmental constraints to the development, improvement, and maintenance of housing.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> Monitor State and federal legislation as well as City development process and zoning regulations to identify and remove housing constraints. 	<p>Result/Evaluation: Program considered successful. City staff and the City Attorney's office regularly monitor legislation changes and update zoning regulations accordingly.</p> <p>Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>

HOUSING AND SUPPORTIVE SERVICES FOR SPECIAL NEEDS POPULATIONS	
<p>Program 6: Sites for Homeless Shelters:</p> <p>Homelessness is a chronic problem throughout Southern California. While the majority of the County's homeless are in the older, more urbanized jurisdictions and in the beach communities, current data indicates approximately 25 homeless persons within the City on any given night. In addition, the City has numerous households who may be considered at-risk of becoming homeless by virtue of their limited incomes. It is important for the City to provide and maintain the appropriate zoning mechanisms to accommodate the provision of facilities that serve the homeless population, most of whom are extremely-low-incomes.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> • Provide financial support to non-profit organizations that shelter the homeless (subject to available funding and on a case-by-case basis). Assist non-profit organizations identify potential sites for homeless shelters. Continue staff participation in the Commission to End Homelessness and support of a Homeless Liaison within the Police Services Department. 	<p>Result/Evaluation: Program considered successful. Although no opportunities to assist non-profits to locate a homeless shelter were identified during the planning period, the City continued its contract with Mercy House, a non-profit service provider specializing in assisting the homeless. Mercy House conducts field outreach and case management work five days per week. The services include mental and physical health assessments and connection of homeless individuals to various services. As part of the contract, Mercy House works with shelter and housing partners to find suitable temporary or long-term housing for the homeless. In addition, the City provided funding for a Homeless Liaison Officer position through its law enforcement services contract with the Orange County Sheriff's Department. The City also provided pass-through CDBG funding annually to local non-profits, including Families Forward, Family Assistance Ministries and South County outreach, that provide food banks, rental assistance, counseling and other forms of assistance to individuals and families at risk of becoming homeless.</p> <p>Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>
<p>Program 7: Transitional and Supportive Housing: The City provided financial assistance to non-profit service agencies to purchase existing housing in the community for use as transitional and supportive housing. These facilities help to address the needs of very low and extremely low income persons. Specifically, the City has provided CDBG funding to non-profit organizations for the purchase and operation of condominium units for transitional/supportive and affordable housing. These condominiums will continue to offer transitional/supportive and affordable housing to extremely low income residents through 2022–2030.</p> <p>Through the City's partnership with Families Forward, supportive services are provided to residents that include weekly case management counseling, weekly budget and financial counseling, child care assistance to attend counseling, education supplies assistance, employment supplies and tools assistance, health care payment assistance, permanent housing placement assistance, legal assistance (as available), life-skills training, weekly children's program that addresses self-esteem, social skills, coping skills, values and beliefs, peer pressure,</p>	<p>Result/Evaluation: Program considered successful. During the 2019-20 fiscal year, for example, the City assisted 4,314 individuals through CDBG sub-recipient funding of nine non-profit organizations that provide services to homeless, low and moderate-income persons, including: case management and in-home support services for home-bound seniors; adult daycare and ancillary services for seniors and adults with Alzheimer's, other forms of dementia, and disabilities; reduced cost medical and pediatric dental services for low- and moderate-income persons; fair housing counseling/advocacy and referral services; transitional housing, support services, and case management for homeless families; rental assistance to help prevent eviction/homelessness; food bank and case management services for lower-income individuals, individuals at risk of homelessness, and homeless individuals (funds also used to prevent evictions and utility shut-off); job training and job development services for adults with developmental disabilities; and motel and transportation vouchers for homeless individuals. The total expenditure for this activity was \$73,245. Comparable assistance was provided in each preceding year of the program. In addition, for the past three years, the City has provided \$40,000-\$50,000 annually in homeless services contracts.</p> <p>Continue/Modify/Delete: Continue. This program continues to</p>

<p>anger management, self-care, and identifying social networks.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> • Provide financial support to non-profit organizations that provide transitional/supportive housing for homeless (subject to available funding and on a case-by-case basis). 	<p>be appropriate and is included in the 2021-2029 Housing Element.</p>
<p>Program 8: Coordination with Social Service Agencies: A variety of social services agencies provide housing and supportive services to special needs groups in Lake Forest. Several of these social service agencies receive CDBG funds from the City to help administer these programs. The City determines its CDBG allocations to social service agencies annually based upon applications received, whether the agency provides a priority need in the City's 5-year Consolidated Plan, and if the agency meets Federal HUD regulations. In a typical program year, funding is allocated to nonprofits that serve the following needs of lower income individuals and households (i.e., those earning up to 80% AMI): food distribution, housing assistance, services and programs for the elderly and youth, before and after school care programs, services for the disabled (including developmentally disabled), primary health care services, and fair housing advocacy and counseling.</p> <p>Similar to the Housing Element update, the Consolidated Plan involves comprehensive outreach, citizen participation workshops, and assessment of community needs to develop a road map for programs and activities to be pursued in the ensuing five years. The variety of social service agencies that may be awarded CDBG are guided by priority needs articulated in the Consolidated Plan. All CDBG-contracted and funded programs (emergency housing/shelter, food distribution, primary health care services to the indigent or non-insured, senior case-management services and home-delivered meals, and before-and-after school youth programs for lower income families) address and assist the needs of lower income persons and households of our community.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> • Continue to evaluate on an annual basis allocation of CDBG Funds to social service agencies to benefit Lake Forest residents. 	<p>Result/Evaluation: Program considered successful. In Fiscal Year 2019-2020, for example, nine non-profit social services agencies received pass-through CDBG funding from the City to provide support and assistance to residents. In addition, two non-profit social services agencies received direct funding from the City to support homeless outreach services. Comparable assistance was provided in each preceding year of the program.</p> <p>Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>

CONSERVE THE EXISTING SUPPLY OF AFFORDABLE HOUSING	
<p>Program 9: Rental Assistance: The Housing Choice Voucher rental assistance program extends rental subsidies to extremely low and very low income families and elderly (i.e., those earning up to 50% AMI) who spend more than 30% of their income on rent. The subsidy represents the difference between the excess of 30% of their monthly income and the actual rent. Rent subsidies can be used to pay for mobile home park space rents. Lake Forest contracts with the Orange County Housing Authority (OCHA) to administer the Federal Housing Choice Voucher Program. According to OCHA, approximately 194 Lake Forest resident households received voucher assistance as of March 2013, with another 809 applicants on the waiting list.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> Continue to contract with the OCHA to administer the Housing Choice Vouchers Program with the goal of assisting an average of approximately 190 extremely low and very low income households annually during the planning period. Promote the Housing Choice Vouchers program on City website. Support the OCHA's applications for additional voucher allocations and efforts to maintain and expand voucher use in the City. 	<p>Result/Evaluation: Program considered successful. Residents continue to be assisted by the Housing Choice Voucher program, which is a HUD Section 8 program that is administered by the Orange County Housing Authority. On average, 190 very low-income households received voucher assistance annually during the planning period.</p> <p>Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>

Program 10: Conservation of Existing and Future

Affordable Units: In order to meet the housing needs of all economic groups in Lake Forest, the City must develop programs to minimize the loss of housing units available to lower income households. As of April 2013, the City's affordable housing inventory consisted of 264 units with at least another 250 affordable units anticipated during the planning period. Of the existing 264 affordable units, 255 were at risk of converting to market rate rents. Of the at-risk units, 209 are only considered "at risk" because owners that have the option to could pre-pay bond funding before 2023. Affordability covenants for 38 units in the Crestwood Apartments expire in 2017, 6 units at Bellecour Way could convert to market rate in 2018, and 2 transitional housing units become "at risk" in 2022 and 2023.

Program Objectives: The City will work with property owners, interest groups and the State and federal governments to implement the following programs on an ongoing basis to conserve its affordable housing stock:

- **Monitor Units at Risk:** Maintain contact with providers and owners to monitor the status of existing and future affordable units, including the 255 at-risk units.
- **Work with Owners:** Provide technical assistance to owners of properties with at-risk units by identifying funding sources and supporting grant or tax credit applications for the extension of affordability covenants.
- **Work with Potential Purchasers:** Where feasible, provide technical assistance to public and non-profit agencies interested in purchasing and/or managing properties that include units at risk.
- **Tenant Education:** The California Legislature extended the noticing requirement of at-risk units opting out of low income use restrictions to one year. Should a property owner pursue conversion of the units to market rate, the City will ensure that tenants were properly noticed and informed of their rights and that they are eligible to receive Section 8 vouchers that would enable them to stay in their units.

Result/Evaluation: Program considered partially successful. As of 2020, a total of 202 affordable units were available in the City. Of these, 11 were designated "at risk". The City actively monitors these units. Should a notice of intent to convert to market rate units be filed, the City will work with potential purchasers to preserve the units and ensure that tenants are properly notified of their rights under California law.

During the prior planning period, five apartment complexes that received bond funding from the County that included affordability covenants for 30 years, with an option to pre-pay bond funding beginning in 2013, converted to fully market-rate complexes. Additionally, six affordable units developed under an agreement with the City's former Redevelopment Agency also converted to market rate units at the end of their affordability term. New affordable units were added to the City's housing stock, including Arroyo at Baker Ranch (187 affordable units) and Saguaro Apartments (4 affordable units).

Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element with modifications.

REHABILITATE THE CITY'S EXISTING SINGLE-FAMILY AND MULTI-FAMILY HOUSING STOCK	
<p>Program 11: Housing Rehabilitation Loan Program: The City provides housing rehabilitation assistance to lower income homeowners through a loan program for owner-occupied single-family detached and attached homes and mobile home units, which is funded through the City's CDBG program. A zero-interest deferred payment loan of up to \$30,000 is available to households earning up to 80% AMI. A 3% interest loan amortized for a 15 year period is available to those who wish to pay off their loan sooner. Loans of up to \$15,000 are also available to owners of mobile homes. Eligible repairs include roofing, windows, exterior and interior painting, plumbing, electrical, energy/weatherization, garage doors, and other common home repairs, as well as accessibility improvements. Since the City has its own rehabilitation program, City residents are no longer eligible to participate in County-sponsored rehabilitation programs.</p> <p>The City promotes its owner-occupied Housing Rehabilitation Loan Program on a year-round basis on its website and in the City's quarterly newsletter. The loan program is only available for owner-occupied homes, townhomes and mobile homes.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> Assist 10 lower income homeowners annually. 	<p>Result/Evaluation: Program considered successful. The City's Housing Rehabilitation Program offers a zero percent deferred interest loan and a three percent amortized interest loan for homes, condominiums, and mobile homes. As an example, during the 2019-2020 fiscal year, 11 income-qualified homeowners participated in and completed needed repairs and improvements to their homes (e.g., roofing, plumbing, electrical, and flooring) through the City's Housing Rehabilitation Loan Program. Total allocation for this program during FY 2019-20 was \$273,690.</p> <p>Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>
<p>Program 12: Code Enforcement and Neighborhood Preservation: The Code Enforcement and Neighborhood Preservation program implements a comprehensive approach to neighborhood improvement in ten targeted Neighborhood Preservation Areas. Code enforcement officers respond to complaints related to substandard housing, property maintenance, overgrown vegetation, trash and debris, illegal conversions, improper occupancy and other nuisance and zoning complaints. In the past, the City has allocated CDBG funds to sponsor periodic neighborhood clean-up and paint days. As funding permits, the City will consider sponsoring similar neighborhood preservation and revitalization events during the planning period. Code enforcement staff will also continue to inform eligible owners about the City's rehabilitation program (see Program 11).</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> Continue to implement the applicable sections of the Lake Forest Municipal Code, 	<p>Result/Evaluation: Program considered successful. The City continues to provide code enforcement activities with the goal of the Code Enforcement and Neighborhood Preservation Program being to address housing and property concerns before they become serious problems. In addition to inspections in target areas, code enforcement officers continue to inform property owners of rehabilitation opportunities. The Neighborhood Pride Paint Program provides grant funding assistance to qualified low- and moderate-income homeowners for the purpose of painting the exterior of their homes. The program is part of broader effort to maintain and improve the character, aesthetic quality and property values within the community. This program is funded on an annual basis, subject to the availability of Federal Community Development Block Grant (CDBG) funds and City Council authorization.</p> <p>The City allocated \$25,370 of CDBG grant funding for the Neighborhood Pride Paint Program in FY 2019-20. In FY 2019-20, five homes were professionally prepped and painted with program assistance. The program contributes to the City's efforts to enhance the appearance of homes in the community and preserve property values. For Fiscal Year 2020-2021, a</p>

including the California Building Code.	<p>significant portion of the City's Community Development Block Grant (CDBG) funding was allocated to assist Lake Forest's residents and small-businesses with preparing, preventing and responding to the COVID-19 pandemic.</p> <p>Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>
PROVIDE HOUSING OPPORTUNITIES FOR FIRST-TIME HOMEBUYERS	
<p>Program 13: Homebuyer Assistance Programs: A few resources are available to Lake Forest residents. The Mortgage Credit Certificate (MCC) Program, administered by the County of Orange, enables lower and moderate income first-time homebuyers to receive a federal income tax credit of up to 15% of the annual mortgage interest paid. The MCC reduces federal income tax, increases takehome pay, and increases the qualifying loan amount for homebuyers. Program assistance is available only to income-eligible persons and families who have not owned a home in the last three years. The property must be a single-family detached home, condominium, or townhouse.</p> <p>The Southern California Housing Finance Agency (SCHFA) raises funds for mortgage financing through the sale of tax-exempt revenue bonds. The City cooperates with lenders and the County in advertising the availability of the SCHFA program.</p> <p>Program Objectives:</p> <ul style="list-style-type: none"> Continue to promote the MCC and SCHFA programs by notifying eligible applicants to County programs and providing information on the City's website with the goal of assisting five households to achieve home ownership annually during the planning period. 	<p>Result/Evaluation: Program considered successful. The City continues to promote and refer individuals to the MCC and SCHFA programs, although the number of homeownership opportunities through these programs may have been limited due to the high cost of homes in Orange County. Nonetheless, the City is optimistic that the increased attention to affordable housing needs at the state level will result in an increase in state-funded programs to assist jurisdictions in providing homebuyer assistance for low- and moderate-income households.</p> <p>Although the MCC program currently applies only to census tracts outside of Lake Forest, the City will continue to monitor the program for any future applicability to Lake Forest households. Pursuant to a cooperation agreement with the Lake Forest Housing Authority, persons interested in the Housing Choice Voucher Program (formerly Section 8) are referred to the Orange County Housing Authority. The County of Orange offers a homeownership program whereby participants may be able to use housing assistance subsidies for mortgage payments. The County also maintains an affordable housing rental list, which contains contact information for affordable rentals throughout the County. Information is provided on the City's website.</p> <p>Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>

EQUAL HOUSING OPPORTUNITY

Program 14: Fair Housing Services: Lake Forest currently contracts with the Fair Housing Council of Orange County (FHCOC) for the provision of fair housing services. Services offered include counseling and information on potential discrimination and landlord/tenant problems, special assistance for ethnic minority and single-headed households (which includes escort services to locate adequate housing), bilingual housing literature and video-tape presentations, day-care services, and housing assistance counseling.

The City monitors and attempts to minimize discriminatory housing practices with the assistance of the FHCOC that is annually funded by the City's CDBG. Fair Housing actively counsels residents on landlord/tenant issues to help minimize landlord and housing acquisition policies that utilize discriminatory practices. In addition to providing educational workshops to City residents, the organization advocates fair housing rights on behalf of residents.

Program Objectives:

- Continue to contract with a fair housing service provider to provide fair housing services. Maintain the link on the City website providing information about fair housing services. Participate in the Regional Analysis of Impediments to Fair Housing Choice and work to mitigate impediments identified in the study.

Result/Evaluation: Program considered successful. The City is committed to furthering fair housing practices in the community and cooperates with the Fair Housing Council of Orange County to eliminate discriminatory practices countywide. The City continues to contract with the Fair Housing Council of Orange County. The Fair Housing Council provides services that include fair housing enforcement and education, landlord/tenant counseling, mediation, and homebuyer HUD counseling which includes first-time homebuyer education and mortgage default counseling. Services are available to low-to-moderate income clients free of charge and to others for a moderate donation. Services are available in English, Spanish, and Vietnamese.

In 2016, Lake Forest participated with 15 other Orange County entitlement cities to prepare a regional Analysis of Impediments to Fair Housing Choice (AI) to fulfill their HUD requirement and remove barriers to fair housing choice for all their residents. The AI examined policies, procedures, and practices within the region that may limit a person's ability to choose their residence free from discrimination. The AI provided an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual or a household's access to housing in the region. It also presented local and regional demographic profiles, assessed the extent of housing needs among specific groups, identified existing barriers or impediments that may limit housing choice, and proposed actions to overcome those barriers.

More recently, in FY 2021-22, the City awarded FHCOC a \$7,500 grant to fund counseling services for tenants and landlords, enforcement, and community education in furtherance of fair housing. FHCOC assisted 70 Lake Forest households in FY 2019-20.

Continue/Modify/Delete: Continue. This program continues to be appropriate and is included in the 2021-2029 Housing Element.

Cumulative Evaluation of the Effectiveness in Meeting the Housing Needs of Special Needs Populations

While goals, policies, and programs that increase the number and variety of different types of units and maintain the high-quality of existing housing stock benefits all residents in Lake Forest, the 2013 Housing Element included a number of policies and programs to specifically address the needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness). To meet the housing needs of special needs populations, the City accomplished the following during the last planning period:

- Elderly

- Program 8: The City allocates CDBG funds to social services agencies that administer housing and supportive services, including services for the elderly. In FY 2019-2020, nine non-profit social services agencies received pass-through CDBG funding from the City to provide support and assistance, including to elderly residents, and comparable assistance was provided in each preceding year of the program.
- Program 9: The City contracts with OCHA to administer the Housing Choice Voucher rental assistance program. During the planning period, 190 very low-income households received assistance annually.

- Persons with Disabilities

- Program 8: As described above, the City allocates CDBG funds to social services agencies that administer housing and supportive services, including services for persons with disabilities (including developmentally disabled). In Fiscal Year 2019-2020, nine non-profit social services agencies received pass-through CDBG funding from the City to provide support and assistance, including to persons with disabilities, and comparable assistance was provided in each preceding year of the program.
- Program 14: The City is committed to furthering fair housing practices and cooperates with the Fair Housing Council of Orange County to eliminate discriminatory practices countywide. The City continues to contract with the Fair Housing Council of Orange County, which provides services that include fair housing enforcement and education, landlord/tenant counseling and mediation. In 2016, Lake Forest participated with 15 other Orange County entitlement cities to prepare a regional Analysis of Impediments to Fair Housing Choice (AI) to remove barriers to fair housing choice for all their residents. The AI examined policies, procedures, and practices within the region that may limit a person's ability to choose their residence free from discrimination. Additionally, the City awarded FHCOOC a \$7,500 grant to fund counseling services for tenants and landlords, enforcement, and community education in furtherance of fair housing. FHCOOC assisted 70 Lake Forest households in FY 2019-20.
- In addition, the City's Reasonable Accommodation Ordinance is codified in Chapter 9.224 of the Zoning Code, and allows for reasonable accommodation (i.e., modifications or exceptions) in the City's zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling.

- Large Family Households

- Program 14: As described above, the City is committed to furthering fair housing practices and cooperates with the Fair Housing Council of Orange County to eliminate discriminatory practices countywide. The City continues to contract with the Fair Housing Council of Orange County, which provides services that include fair housing enforcement and education, landlord/tenant counseling and mediation. In 2016, Lake Forest participated with 15 other Orange County entitlement cities to prepare a regional Analysis of Impediments to Fair Housing Choice (AI) to remove barriers to fair

housing choice for all their residents. The AI examined policies, procedures, and practices within the region that may limit a person's ability to choose their residence free from discrimination. Additionally, the City awarded FHCOOC a \$7,500 grant to fund counseling services for tenants and landlords, enforcement, and community education in furtherance of fair housing. FHCOOC assisted 70 Lake Forest households in FY 2019-20.

- In addition, as shown in Table 37, there are sufficient units in Lake Forest to accommodate both large owner and renter households. The City is further addressing the needs of large family households in the 6th Cycle Housing Element: refer to Program 5, which directs the City to proactively collaborate with housing developers to address the needs of large families.

- Female-Headed Households

- Program 14: As described above, the City contracts with the Fair Housing Council of Orange County, which provides fair housing services, including for single-headed households (which includes escort services to locate adequate housing). In 2016, Lake Forest participated with 15 other Orange County entitlement cities to prepare a regional Analysis of Impediments to Fair Housing Choice (AI) to remove barriers to fair housing choice for all their residents. The AI examined policies, procedures, and practices within the region that may limit a person's ability to choose their residence free from discrimination. Additionally, the City awarded FHCOOC a \$7,500 grant to fund counseling services for tenants and landlords, enforcement, and community education in furtherance of fair housing. FHCOOC assisted 70 Lake Forest households in FY 2019-20.

- Farmworkers

- Program 4: Zone Change 12-14-4673 was approved on June 16, 2015, which added a definition for "agricultural employee quarters" as well as allowing such housing by right within the City's Agricultural and Open Space zones.

- Persons Experiencing Homelessness

- Program 6: The City contracts with Mercy House, a non-profit service provider specializing in assisting the homeless. In addition, the City provided funding for a Homeless Liaison Officer position through its law enforcement services contract with the Orange County Sheriff's Department. The City also provided pass-through CDBG funding annually to local non-profits, including Families Forward, Family Assistance Ministries and South County outreach, that provide food banks, rental assistance, counseling and other forms of assistance to individuals and families at risk of becoming homeless. Further, in 2013, the City amended the Zoning Code to allow emergency shelters by right in the City's industrial zoning districts, subject to compliance with objective standards consistent with the requirements identified in Government Code Section 65583(a)(4), and transitional and supportive housing by right in all residential zoning districts and subject only to the same requirements for residential uses of the same type (e.g., single-family or multi-family) in the same zone.
- Program 7: The City provides financial assistance to non-profit service agencies that serve persons experiencing homelessness. During the 2019-20 fiscal year, for example, the City assisted 4,314 individuals through CDBG sub-recipient funding of nine non-profit organizations that provide services to homeless and low and moderate-income persons. The total expenditure for this activity was \$73,245. Comparable assistance was provided in each preceding year of the program. In addition, for the past three years, the City has provided \$40,000-\$50,000 annually in homeless services contracts.
- In addition, Lake Forest supports a regional effort among the various local agencies making up the South Service Planning Area of Orange County.

3. Housing Needs Assessment

3A. Introduction and Background

The purpose of the Housing Needs Assessment is to describe housing, economic, and demographic conditions in Lake Forest, assess the demand for housing for households at all income levels, and document the demand for housing to serve various special needs populations. The Housing Needs Assessment also addresses whether assisted housing projects are at risk of converting to market rate projects. The Housing Needs Assessment is intended to assist Lake Forest in developing housing goals and formulating policies and programs that address local housing needs.

Several sources of data were used to describe existing demographic and housing conditions, including the following:

- Local Housing Data package for the City of Lake Forest developed by the Southern California Association of Governments (SCAG) and pre-certified by the California Department of Housing and Community Development (HCD) for use in 6th cycle housing elements.
- Data from the 2010 U.S. Census, 2014-2018 U.S. Census American Community Survey (ACS), California Department of Finance (DOF), California Employee Development Department (EDD), and U.S. Department of Housing and Urban Development (HUD) is included to provide information on population, household, housing, income, employment, and other demographic characteristics.
- Regional information from the Fair Housing Council of Orange County.
- Other sources of economic data such as information from website rental listings, multiple listing service, and other published data are used where current Census, ACS, DOF, HUD, and other standard data sources do not provide relevant data.
- Interviews with key agencies and organizations were conducted to obtain information on housing needs and, in particular, needs of populations with special housing needs.
- Research and data related to fair housing, including Census Scope, Social Science Data Analysis Network, the UC Davis Center for Regional Change and Rabobank, N.A., and the California Fair Housing Task Force.

Due to the use of multiple data sources (with varying dates), there are slight variations in some of the information, such as total population and total household numbers, presented in this document. However, these variations do not significantly affect the discussion of overall housing trends and changes.

3B. Population Trends and Characteristics

POPULATION GROWTH

Table 3 shows population growth for Lake Forest and other jurisdictions in the region from 2000 through 2020. According to data prepared by the California DOF, the population of Lake Forest in 2020 was 84,711 persons, an increase of approximately 9.5% since 2010. During the previous decade (2000 to 2010), the City's population increased 31.8% to total 77,395 in 2010, due in large part to the annexation of Foothill Ranch and Portola Hills. Lake Forest's growth during this time was higher than countywide growth. Orange County population growth rates between 2000 to 2010 and 2010 to 2020 are shown in Table 3. Of neighboring jurisdictions, Irvine had both the greatest numeric change in population (136,079 persons) and the largest percentage change in population (93.4%) between 2000 and 2020.

TABLE 3: POPULATION TRENDS – LAKE FOREST AND NEIGHBORING JURISDICTIONS

Jurisdiction	2000	2010	2020	Change 2000-20	% Change 2000-20
Lake Forest	58,707	77,395	84,711	26,004	44.3%
Irvine	145,628	212,375	281,707	136,079	93.4%
Laguna Hills	31,178	30,270	31,508	330	1.1%
Mission Viejo	93,102	93,174	94,267	1,165	1.3%
Rancho Santa Margarita	47,214	47,853	48,793	1,579	3.3%
San Juan Capistrano	33,826	34,593	36,318	2,492	7.4%
Orange County	2,846,289	3,010,232	3,194,332	348,043	12.2%

Sources: US Census, 2000; DOF, 2020

AGE

Changes in age groups can indicate future housing needs. Table 4 compares Lake Forest's age cohort sizes in 2018 with Orange County's. In Lake Forest, children under 15 years of age comprise 17.8% of the City's population, teens and young adults (age 15 – 24) represent 11.8%, and adults in family-forming age groups (age 25 – 44) comprise 28.3%. Adults between the ages of 45 and 64 represent 29% of the population and seniors (age 65 and over) comprise 13.1%. In 2018, the median age in Lake Forest (39.0) was higher than that of Orange County (37.8) and 2.7 years higher than the statewide median age (36.3). The median age of City residents increased from the 2010 median age of 34.1.

TABLE 4: POPULATION BY AGE (2018)

Age	Lake Forest		Orange County	
	Number	Percent	Number	Percent
Under 5 Years	5,232	6.3%	188,956	6.0%
5 to 9	4,366	5.3%	189,548	6.0%
10 to 14	5,160	6.2%	206,380	6.5%
15 to 19	4,849	5.8%	208,793	6.6%
20 to 24	4,972	6.0%	218,993	6.9%
25 to 34	12,528	15.1%	453,121	14.3%
35 to 44	10,905	13.2%	415,919	13.1%
45 to 54	13,794	16.6%	453,608	14.3%
55 to 64	10,304	12.4%	388,376	12.3%
65 to 74	6,768	8.2%	249,211	7.9%
75 to 84	2,888	3.5%	131,180	4.1%
85 and Over	1,145	1.4%	60,097	1.9%
TOTAL	82,911	100%	3,164,182	100%

Source: US Census, 2014-2018 ACS

RACE/ETHNICITY

Table 5 shows the ethnic composition of Lake Forest's population. Similar to Orange County as a whole, the majority of the City's population are White (67.3%). The next largest racial group is Asian (17.1%), followed by "other race" (7.1%), "two or more races" (4.9%), Black or African American (2.2%), and American Indian or Alaska Native (1.2%), and Native Hawaiian and Pacific Islander (0.1%). More than one-fifth of the population (22.7%) is of Hispanic or Latino origin.

TABLE 5: RACE AND ETHNICITY (2018)

Race/Ethnicity	Lake Forest		Orange County	
	Number	Percent	Number	Percent
White	55,805	67.3%	1,950,902	61.7%
Black or African American	1,845	2.2%	54,732	1.7%
American Indian or Alaska Native	977	1.2%	14,466	0.5%
Asian	14,216	17.1%	635,672	20.1%
Native Hawaiian and Pacific Islander	94	0.1%	9,442	0.3%
Some Other Race	5,897	7.1%	370,679	11.7%
Two or More Races	4,077	4.9%	128,289	4.1%
TOTAL	82,911	100%	3,164,182	100%
Hispanic or Latino (of any race)	18,808	22.7%	1,080,195	34.1%

Source: US Census, 2014-2018 ACS

EMPLOYMENT

One of the factors that can contribute to an increase in demand for housing is expansion of the employment base. Table 6 shows the employment and unemployment rates for persons 16 years and older that were in the labor force in 2010 and 2018. In 2018, ACS data indicated that there were 45,788 employed persons in the Lake Forest labor force and that the unemployment rate in Lake Forest was approximately 4.8%, a minor increase from 5.6% in 2010. According to the labor report data compiled by the California EDD, the Anaheim-Santa Ana-Irvine Metropolitan Area's average annual unemployment rate in 2018 was estimated at 3.0%. Orange County's rate was also 3.0%, while California's was 4.1%.

TABLE 6: JOB GROWTH AND EMPLOYMENT STATUS

	2010		2018	
	Number	Percent	Number	Percent
Total Persons in Labor Force	43,789	100%	48,110	100%
Employed	41,346	94.5%	45,788	95.1%
Unemployed	2,443	5.6%	2,322	4.8%

Sources: US Census, 2010-2014 ACS and 2014-2018 ACS

INDUSTRY AND OCCUPATION

Of Lake Forest's employed residents, the "Educational services, health care and social assistance" industry employed the most people at 20.0%. The second largest employment sector was the "Professional, scientific, management, administrative, waste management" industry, which had 14.4% of the total employed persons in Lake Forest. The top two employment sectors in Orange County were also the "Educational services, health care and social assistance" industry at 19.3% and the "Professional, scientific, management, administrative, waste management" industry at 14.4%.

The City's workforce holds a variety of jobs types as shown in Table 7, with the largest sector (49.5%) working in "Management, business, science, and arts occupations", followed by 23.4% in "Sales and office" occupations. Employment and occupation trends play an important role in defining housing needs. This relationship extends beyond the impact of employment growth on housing demand in the City and includes how wage levels and median earnings affect the type of housing affordable to workers and households in Lake Forest. For example, there is a significant gap between the median earnings of a resident employed in management and a resident employed in a service occupation. This informs the types of housing needed in the City.

TABLE 7: JOBS BY INDUSTRY (2018)

Industry	Number	Percent
Agriculture, forestry, fishing and hunting, mining	140	0.3%
Construction	2,081	4.5%
Manufacturing	6,148	13.4%
Wholesale trade	1,498	3.3%
Retail trade	4,862	10.6%
Transportation, warehousing, utilities	1,497	3.3%
Information	1,306	2.9%
Finance and insurance, real estate and rental and leasing	3,847	8.4%
Professional, scientific, management, administrative, waste mgmt.	6,608	14.4%
Educational services, health care and social assistance	9,131	20.0%
Arts, entertainment, recreation, accommodation, food services	4,450	9.7%
Other services	2,909	6.4%
Public administration	1,285	2.8%
TOTAL (Civilian Labor Force)	45,762	100%
Armed Forces	26	100%

Source: US Census, 2014-2018 ACS

TABLE 8: JOBS BY OCCUPATION (2018)

Occupation	Number	Percent	Median Earnings*
Management, business, science, and arts	22,652	49.5%	\$81,087
Sales and office	10,707	23.4%	\$41,417
Service	7,223	15.8%	\$19,792
Production, transportation, and material moving	3,203	7.0%	\$34,804
Natural resources, construction, and maintenance	1,977	4.3%	\$40,088

*Median earnings in 12 months prior to survey

Sources: SCAG 6th Cycle Data Package; US Census, 2014-2018 ACS

TRAVEL TO WORK

Approximately 61% of Lake Forest workers aged 16 and over travelled less than 30 minutes to work. Comparatively, only 6.6% of workers drive more than 60 minutes to work. Most Lake Forest workers, 82.5%, drive alone to work and 7.5% carpool. Table 9 identifies travel time to work, and Table 10 identifies commute methods for Lake Forest workers, in 2018.

TABLE 9: TRAVEL TIME TO WORK (2018)

	Number	Percent
Less than 10 minutes	3,698	8.8%
10-19 minutes	11,787	28.0%
20-29 minutes	10,216	24.2%
30-44 minutes	11,011	26.1%
45-59 minutes	2,658	6.3%
60 + minutes	2,785	6.6%

Source: US Census, 2014-2018 ACS

TABLE 10: COMMUTE METHOD (2018)

	Number	Percent
Drive Alone	37,118	82.5%
Carpooled	3,363	7.5%
Public Transportation	437	1.0%
Walk	289	0.6%
Other	948	2.1%
Work at Home	2,810	6.2%

Source: US Census, 2014-2018 ACS

3C. Household Characteristics

According to the Census, a **household** is defined as all persons living in a housing unit. This definition includes families (related individuals living together), unrelated individuals living together, and individuals living alone. **Householder** refers to the person (or one of the people) in whose name the housing unit is owned or rented (maintained) or, if there is no such person, any adult member, excluding roomers, boarders, or paid employees. The number of householders is equal to the number of households; the number of family householders is equal to the number of families.

A **housing unit** is defined by the Census as a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live and eat separately from any other persons in the building and which have direct access from the outside of the building or through a common hall. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

People living in retirement homes or other group living situations are not considered “households” for the purpose of the U.S. Census count. The household characteristics in a community, including household size, income, and the presence of special needs households, are important factors in determining the size and type of housing needed in the City. Table 11 below identifies the ages of householders in Lake Forest and Orange County in 2018 based on ACS data from 2014-2018. Homeowner households are generally headed by residents early middle-aged to middle-aged, with 54.8% of homeowner households headed by a resident 35-59 years of age. Renter households are generally younger; about 25.2% of renter households are headed by a person aged 25-34.

TABLE 11: HOUSEHOLDS BY TENURE AND AGE (2018)

	Lake Forest		Orange County	
	Number	%	Number	%
Total:	28,713	-	1,032,373	-
Owner Occupied:	19,955	69.5%	592,269	57.4%
Householder 15 to 24 years	58	0.2%	2,053	0.2%
Householder 25 to 34 years	1,764	6.1%	36,065	3.5%
Householder 35 to 44 years	3,070	10.7%	86,899	8.4%
Householder 45 to 54 years	5,410	18.8%	137,678	13.3%
Householder 55 to 59 years	2,451	8.5%	75,371	7.3%
Householder 60 to 64 years	1,878	6.5%	67,259	6.5%
Householder 65 to 74 years	3,429	11.9%	104,985	10.2%
Householder 75 to 84 years	1,494	5.2%	58,068	5.6%
Householder 85 years and older	401	1.4%	23,891	2.3%
Renter Occupied:	8,758	30.5%	440,104	42.6%
Householder 15 to 24 years	237	0.8%	23,193	2.3%
Householder 25 to 34 years	2,211	7.7%	105,489	10.2%
Householder 35 to 44 years	2,144	7.5%	101,763	10%
Householder 45 to 54 years	2,037	7.1%	91,096	8.8%
Householder 55 to 59 years	865	3.0%	33,973	3.3%
Householder 60 to 64 years	496	1.7%	24,592	2.4%
Householder 65 to 74 years	473	1.6%	33,099	3.2%
Householder 75 to 84 years	105	0.4%	16,518	1.6%
Householder 85 years and older	190	0.7%	10,381	1%

Source: US Census, 2014-2018 ACS 5-Year Data Profile (Table B25007)

Table 12 identifies the household sizes by housing tenure. In 2018, the majority of households consisted of 2 to 4 persons. Large households of 5 or more persons made up 9.9% of the total households in Lake Forest, which represents a smaller percentage than the percent of large households residing in Orange County. The average household size was 2.87 persons in Lake Forest, compared to 3.02 persons in the County. Additionally, the average household size in 2018 for owner-occupied units was 2.89 persons per household, compared to 2.82 persons per household for renter-occupied units.

The City has included Program 5: Facilitate Affordable and Special Needs Housing Construction to encourage the production of housing units to accommodate larger households for all income levels, including for extremely very low income households.

TABLE 12: HOUSEHOLD SIZE BY TENURE (2018)

	Lake Forest		Orange County	
	Number	%	Number	%
Owner Households	19,955	100%	592,269	100%
Householder living alone	3,713	18.6%	110,780	18.7%
Households 2–4 persons	14,331	71.8%	404,680	68.3%
Large households 5+ persons	1,911	9.6%	76,809	13%
Average Household Size	2.89 persons		2.99 persons	
Renter Households	8,758	100%	440,104	100%
Householder living alone	2,343	26.8%	106,627	24.2%
Households 2–4 persons	5,474	62.5%	263,316	59.8%
Large households 5+ persons	941	10.7%	70,161	15.9%
Average Household Size	2.82 persons		3.06 persons	
Total Households	28,713	100%	1,032,373	100%
Householder living alone	6,056	21.1%	217,407	21.1%
Households 2–4 persons	19,805	69.0%	667,996	64.7%
Large households 5+ persons	2,852	9.9%	146,970	14.2%
Average Household Size	2.87 persons		3.02 persons	

Sources: SCAG 6th Cycle Data Package; U.S. Census Bureau, 2014-2018 ACS; 2014-2018 ACS 5-Year Data Profile (Table B25009)

3D. Income

HOUSEHOLD INCOME

From 2000 to 2018, the median household income increased by 53.7% to \$104,449 and the per capita income increased by 57.4% to \$44,999. An increase in both per capita and median household incomes also occurred from 2010 to 2018. Table 13 shows per capita and median household incomes in 2000, 2010 and 2018.

TABLE 13: MEDIAN HOUSEHOLD AND PER CAPITA INCOME

	2000	2010	2018
Median Household Income	\$67,967	\$91,040	\$104,449
Per Capita Income	\$28,583	\$38,844	\$44,999

Sources: US Census, 2000; US Census, 2014-2018 ACS

In 2018, the majority (51.6%) of Lake Forest's households earned more than \$100,000 per year. The incidence of households earning less than \$35,000 per year was higher among renter households (18.8%) than owner households (10.8%). Table 14 identifies household income by tenure. As shown in Table 14, the average income of owner households is approximately \$50,000 more than renter households.

TABLE 14: HOUSEHOLD INCOME FOR ALL HOUSEHOLDS AND BY TENURE (2018)

Income	All Households		Owner Households		Renter Households	
	Number	Percent	Number	Percent	Number	Percent
Less than \$5,000	664	2.3%	336	1.7%	328	3.7%
\$5,000 to \$9,999	326	1.1%	150	0.8%	176	2.0%
\$10,000 to \$14,999	609	2.1%	316	1.6%	293	3.3%
\$15,000 to \$19,999	448	1.6%	301	1.5%	147	1.7%
\$20,000 to \$24,999	558	1.9%	336	1.7%	222	2.5%
\$25,000 to \$34,999	1,194	4.2%	700	3.5%	494	5.6%
\$35,000 to \$49,999	2,564	8.9%	1,293	6.5%	1,271	14.5%
\$50,000 to \$74,999	4,063	14.2%	2,199	11.0%	1,864	21.3%
\$75,000 to \$99,999	3,465	12.1%	2,325	11.7%	1,140	13.0%
\$100,000 to \$149,999	5,878	20.5%	4,151	20.8%	1,727	19.7%
\$150,000 or more	8,944	31.1%	7,848	39.3%	1,096	12.5%
Median Household Income	\$104,449		\$123,913		\$70,654	

Source: US Census, 2014-2018 ACS

HOUSEHOLDS BY INCOME GROUP

A special aggregation of 2013-2017 ACS data performed by HUD – titled the Comprehensive Housing Affordability Strategy (CHAS) data – provides a breakdown of households by income group by tenure. The number of households in Extremely Low, Very Low, Low, and Moderate/Above Moderate income groups is shown in Table 15. The majority of households (64.6%) are above moderate income. The HUD CHAS data indicates the extremely low-income group represents 9.9% of households, and a higher proportion are renters (1,470) than owners (1,305). The very low-income group represents 9.6% of households and the low-income group represents 15.9% of households. The smaller amount of extremely low and very low-income households in the City is likely due to the limited housing opportunities for the lower income groups in Lake Forest, including a deficiency of housing with affordable rent. The City's RHNA (see Table 30) identifies the City's share of regional housing needs for extremely low, very low, and low-income households, as well as for moderate and above moderate-income households. As shown in Table 15, there is a larger proportion of renters in the extremely low, very low, and low-income groups, while there is a larger proportion of moderate and above moderate-income groups in owner households.

TABLE 15: HOUSEHOLDS BY INCOME GROUP (2017)

Income Group	Total		Owner		Renter	
	Households	Percent	Households	Percent	Households	Percent
Extremely Low (<30% AMI)	2,775	9.9%	1,305	6.7%	1,470	17.1%
Very Low (31–50% AMI)	2,670	9.6%	1,345	6.9%	1,325	15.4%
Low (51–80% AMI)	4,460	15.9%	2,555	13.2%	1,905	22.2%
Moderate and Above Moderate (>80% AMI)	18,060	64.6%	14,180	73.2%	3,880	45.2%
TOTAL	27,965	100%	19,385	100%	8,580	100%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017

Available: <https://www.huduser.gov/portal/datasets/cp.html>

POVERTY LEVELS

The 2014-2018 ACS data indicates that 909 (4.3%) of all Lake Forest families and 5,839 individuals (7.1%), had incomes at or below the poverty level. According to the ACS data, poverty rates are disparate between races and

economic indicators are particularly severe for Hispanic and Latino populations. In 2018, Hispanics/Latinos had a poverty rate of 11.8% compared to 6.5% for African Americans/Blacks, 5.9% for Whites, 5.8% for Asians, and 5.3% for American Indian and Alaska Natives.

The level of poverty in a jurisdiction often influences the need for housing to accommodate those persons and families in the very low and low-income categories. The U.S. Census Bureau measures poverty by using a set of money income thresholds that vary by family size and composition of who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. For example, the poverty threshold for a family of two with no children would be \$17,120, a household of two with a householder aged 65 or older and no children has a poverty threshold of \$15,453, and the poverty threshold of a family of four with two children under the age of 18 would be \$25,926. (U.S. Census Bureau, 2019).

Extremely Low-Income Households

Extremely low-income (ELI) households are defined as those earning up to 30% of the area median household income. For Orange County, the median household income in 2020 was \$103,000. For ELI households in Lake Forest (and the rest of Orange County), this results in an income of \$38,450 or less for a four-person household or \$26,950 for a one-person household. ELI households have a variety of housing situations and needs. For example, most families and individuals receiving only public assistance, such as social security insurance or disability insurance are considered ELI households. Table 16 provides representative occupations with hourly wages that are within or close to the ELI income range. As shown in Table 15, ELI households make up 9.9% of all households in Lake Forest. Based on Table 28, 80.5% of ELI households in Lake Forest pay more than 30% of their incomes for housing.

TABLE 16: OCCUPATIONS WITH WAGES FOR EXTREMELY LOW-INCOME HOUSEHOLDS (2020)

Occupation Title	Median Hourly Wage
Laborers and Freight, Stock, and Material Movers	\$12.70
Telemarketers	\$12.43
Waiters and Waitresses	\$12.07
Retail Salespersons	\$12.03
Ambulance Drivers and Attendants, Except Emergency Medical Technicians	\$11.94
Cooks, Fast Food	\$11.63
Couriers and Messengers	\$11.61
Personal Care Aides	\$11.59
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	\$11.52
Amusement and Recreation Attendants	\$11.42
Cashiers	\$11.42
Parking Lot Attendants	\$11.41

Source: Employment Development Department, Long-Term Occupational Projections 2016-2026 (accessed January 2021)

Pursuant to Government Code Section 65583(a)(1), 50% of Lake Forest's very low-income regional housing needs assigned by HCD are projected to be extremely low-income households. As a result, from the very low-income need of 954 units (see Table 29), the City has a projected need of 477 units for extremely low-income households (i.e., households earning 30% or less of the average median income). Based on current figures, extremely low-income households will most likely be facing an overpayment, overcrowding, or substandard housing conditions. Some extremely low-income households could include individuals with mental or other disabilities and special needs. To address the range of needs of ELI households, the City will implement several programs including the following programs (refer to the Housing Plan for more detailed descriptions of these programs):

- Program 5: Facilitate Affordable and Special Needs Housing Construction
- Program 9: Sites for Homeless Shelters/Homeless Prevention and Assistance Services

- Program 10: Transitional/Supportive and Affordable Housing
- Program 11: Coordination with Social Service Agencies

3E. Housing Characteristics

HOUSING TYPE

Table 17 identifies the types of housing units in Lake Forest in 2020. The table summarizes total housing stock according to the type of structure. As shown in the table, the majority of housing in Lake Forest is single-family detached housing, which accounted for 58.8% of units in 2020. Mobile/manufactured homes represent 4.2% of the housing stock. Multi-family units represent 26.1% of the housing stock, with duplex through fourplex units accounting for 5.0% and multi-family developments with five or more units accounting for 21.1%. Single-family attached homes represent 14.9% of housing units.

TABLE 17: HOUSING STOCK BY TYPE AND VACANCY (2020)

	Total	Single Family		Multi-family		Mobile Homes	Occupied	Vacant
		Detached	Attached	2 – 4	5 + Units			
Units	30,244	16,567	4,508	1,525	6,369	1,275	28,831	1,413
Percent	100%	58.8%	14.9%	5.0%	21.1%	4.2%	95.3%	4.7%

Sources: SCAG 6th Cycle Data Package; DOF E-5 Report 2020

VACANCY RATE

Table 17 also shows the number and percentage of occupied units and the percentage of vacant units. It is important to note that these counts include all vacant units, including those units that are newly constructed but not yet occupied. In order for the housing market to function properly in a city, there should always be some level of housing vacancy, otherwise rents or housing prices could skyrocket. The 4.7% vacancy rate in Lake Forest is considered low (the historical equilibrium in California is 5.5% for rental vacancy and 1.2% for homeownership vacancy).¹

The 2014-2018 ACS data indicates that there were 1,282 vacant units in 2018. As shown in Table 18, of the total vacant units in 2018, 284 were for rent, 170 were for sale, 394 were rented or sold but not yet occupied, and 313 were for seasonal, recreational, or occasional use. The overall vacancy rate in Lake Forest in 2018 was 4.3%, a rate which has fluctuated slightly since 2010.

TABLE 18: VACANCY BY TYPE (2018)

Vacancy Type	Number	Percent
For rent	284	22.2%
Rented, not occupied	112	8.7%
For sale only	170	13.3%
Sold, not occupied	282	22.0%
For seasonal, recreational, or occasional use	313	24.4%
For migrant workers	0	0.0%
Other vacant	121	9.4%
TOTAL	1,282	100%

Source: US Census, 2014-2018 ACS

¹ "California's low residential vacancy rates signal more construction," *First Tuesday Journal* (February 15, 2021).

HOUSING CONDITIONS

The U.S. Census provides only limited data that can be used to infer the condition of Lake Forest's housing stock. In most cases, the age of a community's housing stock is a good indicator of the condition of the housing stock. Moreover, many federal and state programs also use the age of housing as one factor in determining housing rehabilitation needs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include plumbing, roof repairs, electrical repairs, foundation rehabilitation, or other significant improvements.

The 2014-2018 ACS data indicates that just over half of the housing in the City is less than 40 years old (in 2018); 57.6% of units were built in 1980 or later. Another 32.9% of units were built between 1970 and 1979. Due to the relatively young age of the City's housing stock, overall housing conditions are good. While units built after 1970 may require new roofs and windows, it is anticipated that most units built after 1970 would not need significant rehabilitation to the structure, foundation, electrical, and plumbing systems. Units built prior to 1970 may require aesthetic and maintenance repairs including roof, window, and paint improvements and some units in this age range may also require significant upgrades to structural, roof, plumbing, and other systems.

When examining a housing stock to determine what condition it is in, there are certain factors that the Census considers. For example, older units may not have plumbing that is fully functional, or the plumbing might be substandard. Table 19 indicates that a small percentage of dwelling units (0.5%), which were either owner-occupied or vacant, lacked complete plumbing facilities in 2018.

TABLE 19: HOUSING STOCK CONDITIONS (2018)

Year Structure Built	Owner-Occupied		Renter-Occupied		Total	
	Number	Percent	Number	Percent	Number	Percent
2014 or later	792	4.0%	528	6.0%	1,659	5.5%
2010 to 2013	166	0.8%	94	1.1%	300	1.0%
2000 to 2009	349	1.7%	233	2.7%	627	2.1%
1990 to 1999	3,815	19.1%	1,646	18.8%	5,533	18.4%
1980 to 1989	5,994	30.0%	2,788	31.8%	9,170	30.6%
1970 to 1979	6,937	34.8%	2,604	29.7%	9,879	32.9%
1960 to 1969	1,571	7.9%	642	7.3%	2,273	7.6%
1950 to 1959	214	1.1%	177	2.0%	391	1.3%
1940 to 1949	52	0.3%	9	0.1%	61	0.2%
1939 or earlier	65	0.3%	37	0.4%	102	0.3%
TOTAL	19,955	100%	8,758	100%	29,995	100%
Plumbing Facilities						
Units with Complete Plumbing Facilities	19,926	99.9%	8,758	100%	29,844	99.5%
Units Lacking Complete Plumbing Facilities	29	0.1%	0	0.0%	151	0.5%

Source: US Census, 2014-2018 ACS (Table B25036)

The City's housing stock remains relatively new with only 9.5% of dwelling units in Lake Forest having been constructed prior to 1970, and as such, structural deterioration and maintenance problems are rare. Code enforcement officers conducted a window survey of 600 homes in southwest Lake Forest (the oldest neighborhood most in need of attention) to assess the condition of housing stock in Lake Forest. Of the 600 homes, no homes were identified to need major rehabilitation or replacement. Most, most issues noted included minor exterior issues such as deteriorated paint, dead or dying landscaping, broken windows, etc. One was considered to need major rehabilitation or replacement. This equates to 0.1%. Based on a total housing stock of 30,244 (per Table 3-15), this equates to an estimate of up to 30 units which may be in need of rehabilitation or replacement citywide. The City's Code Enforcement staff have estimated that a very low percentage of housing units are in need of substantial rehabilitation or replacement. Nonetheless, the goal of the City's Code Enforcement program is to address housing

concerns before they become serious problems. The City has introduced Program 24, Neighborhood Improvement Task Force, to address the need of the City's older neighborhoods. The City's first Neighborhood Improvement Plan is being prepared for Southwest Lake Forest, and as described in the Program, the City has committed \$70,500 to implementing improvements in the Southwest Lake Forest neighborhood from 2021-2023.

To supplement the Census information regarding housing conditions, the City of Lake Forest included specific questions pertaining to the quality of the City's housing stock in its Housing Element Update community survey, which was posted for over one month (this is further detailed in Appendix B). When asked to rate the physical condition of the residence they lived in, 39.4% responded that their home shows signs of minor deferred maintenance such as peeling paint or chipped stucco while 54.5% indicated that their home was in excellent condition. Another 9.1% of respondents indicated that their home was in need of a modest repair (like a new roof or new siding) and no one reported that their home needed a major repair (such as new foundation, complete new plumbing, or complete new electrical). Although the sample size was small, renters (57.1%) were just as likely as homeowners (53.8%) to respond that their residence was in excellent condition.

Community members were also asked to report the type of home improvements they have considered making to their homes. The most popular answers that applied were painting, new heating and air conditioning, and roofing.

Additionally, the City's Planning Division's assessment is that, while there are a limited number of homes in need of significant repair scattered throughout various neighborhoods in the City, there are no areas of the City in which it appears that a preponderance of the homes need major repair. In general, areas of the City with older homes have a greater number in need of major repair. The City will continue to implement its residential Rehabilitation Loan Program (RLP) using CDBG funds (when available) to help qualified homeowners to rehabilitate substandard housing.

OVERCROWDING

Typically, a housing unit is considered overcrowded if there is more than one person per room and severely overcrowded if there are more than 1.5 persons per room. Table 20 summarizes overcrowding data for Lake Forest. It should be noted that kitchenettes, strip or Pullman kitchens, bathrooms, porches, balconies, foyers, halls, half-rooms, utility rooms, unfinished attics, basements, or other space for storage are not defined as rooms for Census purposes.

Overcrowded households are usually a reflection of the lack of affordable housing available. Households that cannot afford housing units suitably sized for their families are often forced to live in housing that is too small for their needs, which may result in poor physical condition of the dwelling unit. In 2018, 1,364 housing units (4.8% of the total occupied units) were overcrowded, which represented 2.1% of owner-occupied units and 10.7% of renter-occupied units.

TABLE 20: OVERCROWDING BY TENURE (2018)

Persons per Room	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
1.00 or less	19,528	97.9%	7,821	89.3%	27,349	95.2%
1.01 to 1.50	382	1.9%	517	5.9%	899	3.2%
1.51 or more	45	0.2%	420	4.8%	465	1.6%
TOTAL	19,955	100%	8,758	100%	28,713	100%
Overcrowded	427	2.1%	937	10.7%	1,364	4.8%

Source: US Census, 2014-2018 ACS

As shown in Table 21, the average household size in Lake Forest was 2.87 persons in 2018, which was an increase from the average household size of 2.84 persons in 2010. Table 21 shows Lake Forest's household sizes for owner-occupied, renter-occupied, and all households. The average household size was slightly higher for owner-occupied units (2.89 persons). Renter-occupied households had an average size of 2.82 persons. The large majority (71.8%)

of owner-occupied households had two to four persons, whereas 72.0% of renter-occupied households were one to three persons in size. Table 22 identifies bedrooms by tenure. Although larger renter households and larger owner households are proportionally comparable, the proportion of larger (4 or more bedroom) homes is significantly higher for owner households.

TABLE 21: HOUSEHOLD SIZE BY TENURE (2018)

Household Size	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
1-person	3,713	18.6%	2,343	26.8%	6,056	21.1%
2-person	6,381	32.0%	2,454	28.0%	8,835	30.8%
3-person	3,969	19.9%	1,502	17.2%	5,471	19.1%
4-person	3,981	19.9%	1,518	17.3%	5,499	19.2%
5-person	1,274	6.4%	570	6.5%	1,844	6.4%
6-person	346	1.7%	180	2.1%	526	1.8%
7-or-more-person	291	1.5%	191	2.2%	482	1.7%
TOTAL	19,955	100% (69.5% of total)	8,758	100% (30.5% of total)	28,713	100%
Average Household Size	2.89		2.82		2.87	

Source: SCAG 6th Cycle Data Package

TABLE 22: NUMBER OF BEDROOMS BY TENURE (2018)

Bedroom Type	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
No bedroom	41	0.2%	273	3.1%	314	1.1%
1-bedroom	514	2.6%	2,624	30.0%	3,138	10.9%
2-bedroom	3,718	18.6%	3,328	38.0%	7,046	24.5%
3-bedroom	7,171	35.9%	1,707	19.5%	8,878	30.9%
4-bedroom	6,916	34.7%	652	7.4%	7,568	26.4%
5 or more bedroom	1,595	8.0%	174	2.0%	1,769	6.2%
TOTAL	19,955	100%	8,758	100%	28,713	100%

Source: US Census, 2014-2018 ACS

3F. Housing Costs

FOR SALE HOUSING

As shown in Figure 1, between 2000 and 2018, median home sales prices in Lake Forest increased 207% while prices in the SCAG region increased 151%. The 2018 median home sales price in Lake Forest was \$731,000 – the highest median sales price experienced since 2000. Prices in the City have ranged from a low of 92.7% of the SCAG region median in 2007 to a high of 132.7% in 2017.

In January 2021, there were 175 homes listed for sale in Lake Forest on Zillow.com with prices ranging from \$65,000 to \$2,599,000. Of these homes, there were 135 detached single-family homes with sales prices beginning at \$65,000 (manufactured home). As shown in Table 23, the vast majority of homes for sale were in the \$700,000+ price range (64.6%), with 18.8% of homes in the \$400,000 to \$699,999 range, and 29 priced under

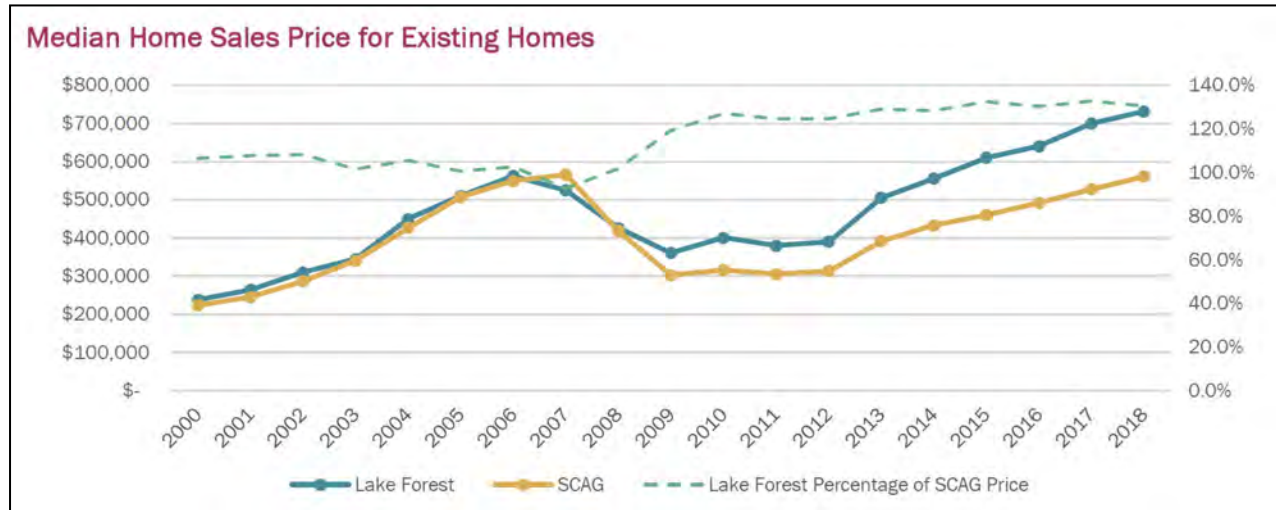
TABLE 23: HOMES FOR SALE (JANUARY 2021)

Price	Homes	Percent
\$700,000 and more	113	64.6%
\$600,000 - \$699,999	13	7.4%
\$500,000 - \$599,999	9	5.1%
\$400,000 - \$499,999	11	6.3%
\$300,000 - \$399,999	7	4.0%
\$200,000 - \$299,999	6	3.4%
\$100,000 - \$199,999	12	6.9%
\$0 - \$99,999	4	2.3%

Source: Zillow.com, 2021

\$400,000. Zillow identified the January 2021 median sales price as \$774,000. While the median sales price is not affordable to lower and moderate-income households (see Table 27), the City's median home sales price was lower than the Orange County median sales price (Zillow reported a median home sales price of \$872,000 for the County in January 2021), which may result in higher demand for housing in Lake Forest.

FIGURE 1: MEDIAN HOME SALES PRICE



Source: SCAG 6th Cycle Data Package

RENTAL HOUSING

Table 24 summarizes rents paid in Lake Forest in 2018 by rent-cost range. The majority (84.9%) of units rented for \$1,500 or more. Only 3.4% of rentals were under \$1,000 per month. More than one-third of rentals were in the \$1,500 to \$1,999 range. Based on a review of rental listings on *Zillow.com* and *Craigslist.com*, the average rent in Lake Forest (January 2021) is \$2,802 per month. There were 49 rentals available in January 2021. Rents ranged from \$1,900 to \$2,549 for 2 bed/2 bath homes to \$3,600 to \$7,500 for four or more-bedroom homes, as shown in Table 25.

TABLE 24: RENTAL COSTS (2018)

Rent Range	Number	Percent
Less than \$500	125	1.5%
\$500 to \$999	166	1.9%
\$1,000 to \$1,499	994	11.6%
\$1,500 to \$1,999	3,347	39.0%
\$2,000 to \$2,499	2,345	27.3%
\$2,500 to \$2,999	903	10.5%
\$3,000 or more	695	8.1%
Median (dollars)	\$1,949	

Source: US Census, 2014-2018 ACS

TABLE 25: RENTAL RATES BY NUMBER OF BEDROOMS

Bedroom Type	Rental Survey		
	Units Available	Range	Average Rent
Studio	2	\$1,600 - \$2,031	\$1,816
1 bed	12	\$1,650 - \$2,098	\$1,841

2 bed	22	\$1,900 - \$2,549	\$2,225
3 bed	10	\$2,600 - \$3,900	\$3,193
4 bed or more	3	\$3,600 - \$7,500	\$4,933

Sources: Zillow.com and Craigslist.com, Jan. 2021

INCOME GROUPS

The California Department of Housing and Community Development (HCD) publishes household income data annually for areas in California. Table 26 shows the maximum annual income level for each income group adjusted for household size for Orange County. The maximum annual income data is utilized to calculate the maximum affordable housing payments for different households (by income level and number of persons in household) and their eligibility for housing assistance programs.

- *Extremely Low-Income Households* have a combined income at or lower than 30% of area median income (AMI), as established by the Department of Housing and Community Development (HCD).
- *Very Low-Income Households* have a combined income between 30 and 50% of AMI, as established by HCD.
- *Low-Income Households* have a combined income between 50 and 80% of AMI, as established by HCD.
- *Moderate-Income Households* have a combined income between 80 and 120% of AMI, as established by HCD.
- *Above Moderate-Income Households* have a combined income greater than 120% of AMI, as established by HCD.

TABLE 26: STATE INCOME LIMITS – ORANGE COUNTY (2021)

Income Group	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low	\$28,250	\$32,300	\$36,350	\$40,350	\$43,600	\$46,850	\$50,050	\$53,300
Very Low	\$47,100	\$53,800	\$60,550	\$67,250	\$72,650	\$78,050	\$83,400	\$88,800
Low	\$75,300	\$86,050	\$96,800	\$107,550	\$116,200	\$124,800	\$133,400	\$142,000
Moderate	\$89,650	\$102,450	\$115,250	\$128,050	\$138,300	\$148,550	\$148,550	\$169,050
Above Moderate	\$89,650+	\$102,450 +	\$115,250 +	\$128,050 +	\$138,300 +	\$148,550 +	\$148,550 +	\$169,050 +

Source: HCD 2020 Orange County Income Limits

HOUSING AFFORDABILITY

Table 27 shows the estimated maximum rents and sales prices that are affordable to very low, low, moderate, and above moderate-income households. Affordability is based on a household spending 30% or less of their total household income for shelter. Affordability is based on the maximum household income levels established by HCD (Table 26). The annual income limits established by HCD are similar to those used by the U.S. Department of Housing and Urban Development (HUD) for administering various affordable housing programs. Maximum affordable sales price is based generally on the following assumptions: 4% interest rate, 30-year fixed loan, and down payments that vary with income level, as described in Table 27.

Comparing the maximum affordable housing costs in Table 27 to the rental rates, rental rates in Lake Forest are generally affordable to moderate-income households of two or more persons and to above moderate-income households of all household sizes. While there are some units affordable to low-income households, they tend to be smaller units ranging in size from 1- to 2-bedrooms. Moderate and above moderate-income households can afford a broad range of available housing options.

Although there are homes for sale in Lake Forest available to all income, the overwhelming majority of homes (i.e., in the \$700,000+ range) are affordable to only above moderate-income households.

TABLE 27: HOUSING AFFORDABILITY BY INCOME GROUP

Income Group	One Person		Two Person		Four Person		Six Person	
	Home Sale Price*	Monthly Rent or Housing Cost	Home Sale Price*	Monthly Rent or Housing Cost	Home Sale Price*	Monthly Rent or Housing Cost	Home Sale Price*	Monthly Rent or Housing Cost
Extremely Low	\$100,663	\$706	\$116,026	\$808	\$146,561	\$1,009	\$171,216	\$1,171
Very Low	\$180,231	\$1,178	\$201,200	\$1,345	\$252,218	\$1,681	\$293,184	\$1,951
Low	\$286,375	\$1,883	\$327,151	\$2,151	\$408,704	\$2,689	\$474,136	\$3,120
Moderate	\$358,009	\$2,241	\$407,950	\$2,561	\$493,708	\$3,201	\$571,467	\$3,714
Above Moderate	\$358,009+	\$2,241+	\$407,950+	\$2,561+	\$493,708+	\$3,201+	\$571,467+	\$3,714+

*Maximum affordable sales price is based on the following assumptions: 4.0% interest rate, 30-year fixed loan; down payment: \$5,000 – extremely low, \$10,000 – very low; \$15,000 – low, \$25,000 – moderate; property tax, utilities, and homeowners insurance as 30% of monthly housing cost (extremely low/very low), 28% of monthly housing cost (low), and 25% of monthly housing cost (moderate/above moderate).

Homes sales prices are rounded to nearest \$100.

Source: De Novo Planning Group, 2021

Extremely Low-income Households

As previously described, extremely low-income households earn less than 30% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$706 and \$1,171 per month and could purchase homes priced at \$100,663 to \$171,216. As of January 2021, there were no rental homes listed on Zillow or Craigslist that would be affordable to extremely low-income households. However, based on US Census data, approximately 3.4% of renters pay monthly rents affordable to extremely low-income households. Extremely low-income households *may* be able afford to purchase a manufactured home in Lake Forest; however, real estate listings for these homes indicate that homes affordable at this price point may need significant maintenance and repair and there is an extremely limited supply.

Very Low-income Households

Very low-income households earn between 31% and 50% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$1,178 to \$1,951 per month and could purchase homes priced at \$180,231 to \$293,184. As of January 2021, there were some studio and one-bedroom rental units listed on Zillow or Craigslist that could be affordable to very low-income households. However, based on US Census data, approximately 15.0% of renters pay monthly rents affordable to very low-income households (inclusive of units also affordable to extremely low-income). Very low-income households may be able afford to purchase a manufactured home or multi-family home in Lake Forest; however, even those units affordable to very low-income households need maintenance and repair and there continues to be a very limited supply.

Low-income Households

Low-income households earn between 51% and 80% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$1,883 to \$3,120 per month and could purchase homes priced at \$286,375 to \$474,136. As of January 2021, all studio, one-, and two-bedroom options listed on Zillow or Craigslist would be affordable to rent for low-income households. Based on US Census data, 81.3% of renters in Lake Forest pay monthly rents affordable to low-income households. However, most renters are not larger six-person households, so the actual affordability by household size may be significantly more limited. Low-income households can afford to rent a variety of home types, including better-maintained manufactured homes, multi-family homes, and some single-family detached homes.

Moderate-income Households

Moderate-income households earn between 80% and 120% of the County Area Median Income (AMI). Depending

on the household size, these households can afford rents between \$2,241 and \$3,714 per month and could purchase homes priced at \$358,009 to \$571,467. As of January 2021, nearly all studio, one-, two-, and three-bedroom rental units available were affordable to moderate-income households; these units included multi-family homes as well as single-family homes listed for rent by the homeowner. Moderate-income households can also afford a broader array of homes listed for sale as of January 2021. These unit types include manufactured homes, single-family homes, and multi-family homes. This is further confirmed by US Census data.

OVERPAYMENT

As in most communities, the location of the home is one of the biggest factors with regard to price. Housing in Lake Forest is more affordable than the County (\$774,000 versus \$872,000 according to Zillow median sales prices in January 2021). However, housing is not affordable for all income levels, particularly the extremely low, very low, and low-income households.

As shown in Table 28, 50.6% of renters in Lake Forest and 28.1% of homeowners overpay for housing. The majority of renters that overpay are in the lower income groups, with 76.2% in the extremely low-income group and 64.1% in the very low-income group severely overpaying for housing (over 50% of their monthly income). Comparatively, 71.6% of extremely low-income owners and 42.0% of very low-income owners are severely overpaying. Therefore, while overpayment is more predominate among lower income renter households, overpayment is an issue for both renter and owner households. Slightly more than one-third (35.0%) of all households in Lake Forest overpay for housing.

TABLE 28: HOUSEHOLDS BY INCOME LEVEL AND OVERPAYMENT (2017)

Household Overpayment	Renters	Owners	Total	% of Income Category
Extremely Low-Income Households	1,470	1,305	2,775	100%
With Cost Burden >30%	1,215 / 82.7%	1,020 / 78.2%	2,235	80.5%
With Cost Burden >50%	1,120 / 76.2%	935 / 71.6%	2,055	74.1%
Very Low-Income Households	1,325	1,345	2,670	100%
With Cost Burden >30%	1,185 / 89.4%	860 / 63.9%	2,045	76.6%
With Cost Burden >50%	850 / 64.1%	565 / 42.0%	1,415	53.0%
Low-Income Households	1,905	2,555	4,460	100%
With Cost Burden >30%	1,255 / 65.9%	1,585 / 62.0%	2,840	63.7%
With Cost Burden >50%	165 / 8.7%	515 / 20.2%	680	15.2%
Total Extremely Low, Very Low, and Low-Income Households Paying >30%	3,655 / 78%	3,465 / 67%	7,120	72% of lower income households
Moderate and Above Moderate-Income Households	3,880	14,180	18,060	100%
With Cost Burden >30%	690 / 17.8%	1,990 / 14.0%	2,680	14.8%
With Cost Burden >50%	55 / 1.4%	180 / 1.3%	235	1.3%
Total Households	8,580	19,385	27,965	100%
With Cost Burden >30%	4,345 / 50.6%	5,455 / 28.1%	9,800	35.0%
With Cost Burden >50%	2,190 / 25.5%	2,195 / 11.3%	4,385	15.7%

Note: Data is rounded to the nearest 5.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017

AFFORDABLE HOUSING INVENTORY

Affordability covenants in Lake Forest include developments that received federal pass-through funding (CDBG), received tax credits or mortgage revenue bonds, were financed with redevelopment funds or by non-profit developers, and/or were created to meet the City's inclusionary housing policy.

Table 29 shows assisted units with covenants that require rents to be maintained at affordable levels for various agreed upon periods of time. In 2021, Lake Forest has 202 total deed-restricted affordable units. A recorded deed restriction serves as an affordability covenant that restricts the income level of a person who occupies the property, and property and ensures the property will remain available for low to moderate-income persons for a defined period.

The City has included Program 15: Conservation of Existing Affordable Units, to outline steps the City can take to help preserve all 11 units that are at-risk of converting to market rate units in the next 10 years.

TABLE 29: DEED RESTRICTED AFFORDABLE HOUSING UNITS

Project Name/Location	No. & Type of Affordable Units	Duration of Affordability
Shelter for the Homeless (formerly American Family Housing) ¹ 20927 Serrano Creek Road	1 affordable	2029
South County Outreach Condo Units ¹	1 Transitional	2022
	2 Transitional	2023
	2 Transitional	2024
	3 Transitional	2025
Madrid Transitional Housing Condo Units ² 22702, 22706 Madrid Drive	2 Transitional	2030
The Arroyo at Baker Ranch, 100 Indigo Place ³	187 affordable	2045
Saguaro Apartments, 23201 Saguaro Street ⁴	4 affordable	2071
	202	

Notes:

¹ There are 8 transitional housing units and 1 affordable unit that received CDBG funding from the City, and are required to be affordable to very low or low-income households for 25 years from the date the covenants were first agreed upon. Under the covenant for the affordable unit, the occupant(s) in that unit may remain in the unit as long as he or she continues to qualify as an affordable household. The affordable unit may continue to be rented by the same tenant(s) as long as the tenant(s) continue to qualify as a very low or low-income household.

² The Madrid condos are owned by the Lake Forest Housing Authority and were purchased with Redevelopment Agency Housing Set-Aside Funds

³ Per Shea/Baker Ranch Development Agreement/Affordable Housing Implementation Plan

⁴ The Saguaro Apartments were purchased from the Lake Forest Housing Authority by Families Forward.

MOBILE HOMES

Mobile homes offer a more affordable option for those interested in homeownership. The median value of a mobile home in Orange County in 2018 was \$59,000 (2018 ACS 5-Year Estimates Data Profile). Overall, 1,275 mobile homes are located in Lake Forest (DOF, Table 2: E-5, 1/1/2020). According to HCD, there are four mobile home parks in the City with a total of 1,238 permitted spaces. They are:

- El Toro Mobile Estates (30-0282-MP), 24921 Muirlands Blvd. – 328 MH spaces
- Forest Gardens Mobile Home Community (30-0268-MP), 24001 Muirlands Blvd. – 494 MH spaces
- Kimberly Gardens Mobile Home Park (30-0266-MP), 24922 Muirlands Blvd. – 159 MH spaces
- Prothero Mobile Estates (30-0299-MP), 24701 Raymond Way – 257 MH spaces

In addition to the cost of a mobile home, owners must either purchase a residential site or rent a mobile home space. And although they present a more affordable alternative, mobile home rents have risen steadily in Orange County and throughout southern California since 2009.²

² Jeff Collins, "Soaring rents jolt senior tenants at mobile home park," *OC Registrar* (July 20, 2018).

3G. Future Housing Needs

A Regional Housing Needs Plan (RHNP) is mandated by the State of California (Government Code [GC], Section 65584) for regions to address housing issues and needs based on future growth projections for the area. The RHNP for Lake Forest is developed by the Southern California Association of Governments (SCAG), and allocates a “fair share” of regional housing needs to individual cities and counties (for unincorporated portions of the region). The intent of the RHNP is to ensure that local jurisdictions address not only the needs of their immediate areas but also that needs of the entire region are fairly distributed to all communities. A major goal of the RHNP is to assure that every community provides an opportunity for a mix of housing affordable to all economic segments of its population.

This Housing Element addresses SCAG’s Regional Housing Needs Assessment (RHNA) schedule for the 6th Cycle, from 2021 through 2029. The City will need to plan to accommodate 3,236 new units, which includes 956 extremely low/very low, 543 low, 559 moderate, and 1,178 above moderate-income units. Pursuant to Government Code Section 65583(a)(1), 50% of Lake Forest’s very low-income regional housing need assigned by HCD are extremely low-income units, effectively resulting in 478 extremely low-income units and 478 very low-income units. Table 30 summarizes Lake Forest’s fair share, progress to date, and remaining units.

TABLE 30: REGIONAL HOUSING NEEDS ALLOCATION – 6TH CYCLE

Status	Extremely Low/Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	956	543	559	1,178	3,236
Completed, Under Construction/Permits Issued (Since 6/30/2021, <u>accurate as of August 31, 2022</u>)	13	13	4	752 <u>451</u>	755 <u>461</u>
Units Approved/Entitled	107 <u>105</u>	97 <u>93</u>	53	544 <u>775</u>	753 <u>976</u>
Remaining Allocation	848	445 <u>447</u>	553 <u>552</u>	0 (with a surplus of 116 <u>48</u> units)	1,84 <u>67</u> *

Source: City of Lake Forest, August 31, 2021, SCAG, 2021

* The total remaining allocation is the remaining allocation of extremely low/very low, low, and moderate income units (848, ~~445~~447, and ~~553~~552, respectively). This results in a remaining allocation of 1,8476 units. The surplus of above moderate-income units (~~116~~48) cannot be deducted from the remaining allocation, which is based on the remaining allocation by income level.

3H. Special Needs Groups

Government Code Section 65583(a)(7) requires housing elements to address special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. The needs of these groups often call for targeted program responses, such as temporary housing, preservation of residential hotels, housing with features to make it more accessible, and the development of four-bedroom apartments. Special needs groups have been identified and, to the degree possible, responsive programs are provided in the Housing Plan. A principal effort in addressing the needs of these groups is to continue to seek state technical assistance grants to identify the extent and location of those with special needs and identify ways and means to assist them. Local government budget limitations may act to limit effectiveness in implementing programs for these groups. Please refer to Section 5E of this Element for a discussion of agencies and programs that serve special needs populations in Lake Forest.

SENIORS

Seniors are considered persons age 65 or older in this Housing Element. However, some funding programs have lower age limits for persons to be eligible for their senior housing. Seniors have special housing needs primarily resulting from physical disabilities and limitations, fixed or limited income, and health care costs. Additionally, senior households also have other needs to preserve their independence including supportive services to maintain their health and safety, in-home support services to perform activities of daily living, conservators to assist with personal care and financial affairs, public administration assistance to manage and resolve estate issues, and networks of care to provide a wide variety of services and daily assistance.

TABLE 31: SENIOR POPULATION AND HOUSEHOLDS (2010 & 2018)

Population	2010	2018
Number	7,011	10,801
Percent Change	-	54.1%
Annual Percent Change	-	6.8%
Households	2010	2018
Number	3,899	6,092
Percent Change	-	56.2%
Annual Percent Change	-	7.0%

Source: US Census, 2010; US Census, 2014-2018 ACS

Various portions of the Housing Element describe characteristics of the senior population, the extent of their needs for affordable housing, housing designated for seniors, and City provisions to accommodate their need. Senior household growth in Lake Forest from 2010 to 2018 is shown in Table 31. The large increase in elderly persons is likely due to the residential growth experienced in Lake Forest as well as aging in place of Lake Forest's residents. Senior households increased by approximately 56.2% from 2010 to 2018. While seniors represent approximately 13.1% of the City's population, senior households represent approximately 21.2% of total households, which is primarily due to the smaller senior household size.

Table 32 summarizes senior households by age and tenure. The majority of senior households are owners (5,324 or 87.4%). Approximately 12.6% of senior households (768), are renters. Lake Forest has a slightly higher percentage of owner-occupied elderly households than Orange County (18.5% vs. 18.1%), but a lower percentage of renter-occupied elderly households (2.7% vs. 5.8%). Elderly renters tend to prefer affordable units in smaller single-story structures or multi-story structures with an elevator, close to health facilities, services, transportation, and entertainment.

During the planning period, senior households are anticipated to increase at a rate commensurate with overall population and household growth. It is anticipated that approximately 21% of the City's RHNA allocation will be needed or used by senior households. Senior housing types can include market rate homes, senior single-family housing communities, senior apartments, and mobile/manufactured homes.

TABLE 32: HOUSEHOLDER AGE BY TENURE (2018)

Age Group	Owners		Renters	
	Number	Percent	Number	Percent
65-74 years	3,429	64.4%	473	61.6%
75-84 years	1,494	28.1%	105	13.7%
85 plus years	401	7.5%	190	24.7%
TOTAL	5,324	18.5% (of total pop.)	768	2.7% (of total pop.)

Source: US Census, 2014-2018 ACS

The 2014-2018 ACS survey indicates that 9.9% of senior households in Lake Forest are below the poverty level. It is likely that a portion of these senior households overpay for housing due to their limited income. The median income of households with a head of household that is 65 years and over is \$64,289; significantly less (38.4%) than the all-ages median household income of \$104,449.

Senior Housing

A variety of housing types are available to the senior population. This section focuses on three basic types.

Independent Living – Housing for healthy seniors who are self-sufficient and want the freedom and privacy of their own apartment or house. Many seniors age in place, and others move to residential communities which provide enhanced security, amenities and social activities geared towards a senior community.

Group Living – Shared living arrangements in which seniors live in proximity to their peers and have access to activities and special services.

Assisted Living – Provides the greatest level of support, including meal preparation and assistance with other activities of daily living.

There are a number of licensed community care facilities in Lake Forest operating out of homes that serve elderly persons. Furthermore, there is one commercially operating assisted living residential care facilities for the elderly in the City:

- Freedom Village, 23442 El Toro Road – senior living community offering independent and assisted living, and Alzheimer's care

Several programs address the non-housing needs of seniors in Lake Forest. Additional support for senior residents is provided by the City-operated Clubhouse Senior Center, which serves as the primary site for senior programs offered by the City. Some of the programs and services provided at the Clubhouse include health screening and health care counseling, legal assistance, and driver safety courses. The City also partners with and funds the non-profit Age Well Senior Services organization to provide senior transportation services.

DISABLED PERSONS

A “disability” includes, but is not limited to, any physical or mental disability as defined in California Government Code Section 12926. A “mental disability” involves having any mental or psychological disorder or condition that limits a major life activity. A “physical disability” involves having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that affects body systems. In addition, a mental or physical disability limits a major life activity by making the achievement of major life activities difficult including physical, mental, and social activities and working.

Physical, mental, and/or developmental disabilities could prevent a person from working, restrict a person's mobility, or make caring for oneself difficult. Therefore, disabled persons often require special housing needs related to potential limited earning capacity, the lack of accessible and affordable housing, and higher health costs associated with disabilities. Additionally, people with disabilities require a wide range of different housing, depending on the type and severity of their disability. Housing needs can range from institutional care facilities to facilities that support partial or full independence (i.e., group care homes). Supportive services such as daily living skills and employment assistance may need to be integrated in the housing situation.

- Individuals with a mobility, visual, or hearing limitation may require housing that is physically accessible. Examples of accessibility in housing include widened doorways and hallways, ramps, kitchen and bathroom modifications (e.g., lowered countertops, grab bars, adjustable shower heads, etc.) and special sensory devices including smoke alarms and flashing lights.
- Individuals with self-care limitations (which can include persons with mobility difficulties) may require residential environments that include in-home or on-site support services ranging from congregate to

convalescent care. Support services may include medical therapy, daily living assistance, congregate dining, and related services.

- Individuals with developmental disabilities and other physical and mental conditions that prevent them from functioning independently may require assisted care or group home environments.
- Individuals with disabilities may require financial assistance to meet their housing needs because a higher percentage than the population at large are low-income and their special housing needs are often more costly than conventional housing.

According to the 2014-2018 ACS, there were 5,920 persons with one or more disabilities in Lake Forest. Of the disabled population, 55.0% were aged 5 to 64 and 44.6% were aged 65 and over. No disabilities were reported in the population aged 5 and under (except for hearing difficulty – 21 persons under 5 years of age). Table 33 shows the number of persons with one or more disability by type of disability.

TABLE 33: DISABILITIES BY DISABILITY TYPE (2018)

Type of Disability	Persons Ages 5-64		Persons Ages 65+		Total	
	Number	Percent	Number	Percent	Number	Percent
Hearing Difficulty	812	24.9%	1,308	49.5%	2,141	36.2%
Vision Difficulty	456	14.0%	399	15.1%	855	14.4%
Cognitive Difficulty	1,480	45.4%	638	24.2%	2,118	35.8%
Ambulatory Difficulty	1,066	32.7%	1,568	59.4%	2,634	44.5%
Self-Care Difficulty	567	17.4%	663	25.1%	1,230	20.8%
Independent Living Difficulty	1,160	35.6%	1,282	48.5%	2,442	41.3%
Total Persons with One or More Disabilities ¹	3,258	100% / 55.0% of disabled	2,641	100% / 44.6% of disabled	5,920	100%

¹A person may have more than one disability, so the total disabilities may exceed the total persons with a disability

Source: US Census, 2014-2018 ACS

As shown in Table 34, the 2014-2018 ACS indicates that for individuals between the ages of 16 and 64, approximately 1,286 persons had some form or type of disability and were not in the labor force. This indicates that their disability may impede their ability to earn an adequate income, which in turn could affect their ability to afford suitable housing accommodations to meet their special needs. Therefore, many in this group may need housing assistance.

TABLE 34: DISABLED PERSONS BY EMPLOYMENT STATUS (2018)

	Ages 16 to 64	Percent
Employed with Disability	1,261	44.9%
Unemployed with Disability	260	9.3%
Not in Labor Force	1,286	45.8%
Total	2,807	100%

Source: US Census, 2014-2018 ACS

While recent Census data does not provide income levels or overpayment data for persons with a disability, the 2014-2018 ACS survey does report on indicators that relate to a disabled person's or household's income. The 2014-2018 ACS data indicates that 583 Lake Forest residents with a disability are below the poverty level. It is likely that a portion of these disabled persons are in households that overpay for housing due to their limited income. The 2014-2018 ACS data indicates that 15.7% of households receiving food stamps or similar assistance have a

disabled member. Of the 4,521 households with a disabled member, 284 households receive food stamps or similar assistance. The 2014-2018 ACS data indicates that the median earnings for males 16 years of age and older with a disability was \$24,453 compared with \$60,898 for males with no disability. Median earnings for females 16 years of age and older with a disability was \$29,500, compared to \$41,142 for females with no disability.

The persons in the “with a disability” category in Tables 3-31 and 3-32 include persons with developmental disabilities. “Developmental disability” means “a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual.” This term includes intellectual disability, cerebral palsy, epilepsy, autism, and disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with intellectual disabilities, but does not include other handicapping conditions that are solely physical in nature.

While the U.S. Census reports on a broad range of disabilities, the Census does not identify the subpopulation that has a developmental disability. The California Department of Developmental Services (DDS) maintains data regarding people with developmental disabilities, defined as those with severe, life-long disabilities attributable to mental and/or physical impairments. The DDS data is reported by zip code, so the data reflects a larger area than the City of Lake Forest; however, the data was joined at the jurisdiction level by SCAG to approximate the counts for Lake Forest. The DDS/SCAG data indicates that 452 developmentally disabled persons reside in zip codes 92610, 92630, and 92679. Table 35 breaks down the developmentally disabled population by residence type. Of these persons, the majority (366) live at home with a parent or guardian and only 29 live independently.

TABLE 35: DEVELOPMENTALLY DISABLED PERSONS BY RESIDENCE TYPE (2018)

	Home of Parent/ Guardian	Independent/ Supported Living	Community Care Facility	Intermediate Care Facility	Foster/ Family Home	Other	TOTAL
Lake Forest*	366	29	36	11	5	5	452

*Data is for the Lake Forest portion of zip codes 92610, 92630, and 92679

Sources: CA DDS, 2020; SCAG 6th Cycle Data Package

Housing for Disabled Persons

Households with a disabled member will require a mixture of housing units with accessibility features, in-home care, or group care housing facilities. Some of these households will have a member with a developmental disability and are expected to have special housing needs. Developmentally disabled persons may live with a family in a typical single-family or multi-family home, but some developmentally disabled persons with more severe disabilities may have special housing needs that may include extended family homes, group homes, small and large residential care facilities, intermediate care, and skilled nursing facilities, and affordable housing such as extremely low/very low/low-income housing (both rental and ownership), Section 8/housing choice vouchers, and single room occupancy-type units.

Although there are no Adult Residential Facilities for Persons with Special Health Care Needs, including physical, mental, and developmental disabilities in Lake Forest, there are ten licensed adult residential facilities operating in the City as of August 2021. Furthermore, there are service providers operating in the City such as BrightStar Care that provide in-home care to support people with disabilities like spina bifida and cerebral palsy. The Regional Center of Orange County offers services and support for persons with developmental disabilities by referring consumers to specific programs that meet their respective housing, work, educational, and leisure needs. In addition, in an effort to assist persons with developmental disabilities, the City previously and for many years allocated part of its CDBG funding to the non-profit Vocational Visions organization, which offers vocational training and support services for consumers through community supported employment.³ Residents with disabilities can also benefit from services offered by the Dayle McIntosh Center for the Disabled – South County Branch in neighboring Laguna Hills. The

³ Vocational Visions did not apply for Fiscal Year 2021-2022 funding.

center offers disabled persons a variety of services including peer support and advocacy, along with housing referral, and rental and hotel/motel assistance if needed.

The 2014-2018 ACS data indicates that for individuals between the ages of 5 and 64, approximately 1.3% of the total population of Lake Forest have an ambulatory difficulty, 0.5% have a vision difficulty, 1.0% have a hearing difficulty, and 1.4% have an independent living difficulty. These types of disabilities may impede their ability to find suitable housing accommodations to meet their special needs. Therefore, many in these groups may need housing assistance. Households containing disabled persons may also need housing with universal design measures or special features to allow better physical mobility for occupants.

The 2014-18 ACS data also indicates that 4,521 households (15.7%) in Lake Forest had one or more disabled persons, including developmentally disabled persons. It is anticipated that this rate will remain the same during the planning period. Housing needed for persons with a disability during the planning period is anticipated to include community care facilities or at-home supportive services for persons with an independent living difficulty or self-care difficulty (approximately 4.4% of the population), as well as housing that is equipped to serve persons with ambulatory and sensory disabilities. Approximately 15% of the City's RHNA allocation, 484 units, may need to have universal design measures or be accessible to persons with a disability.

LARGE FAMILY HOUSEHOLDS

Large-family households are defined by the US Census Bureau as households of five or more persons. Large-family households are considered a special needs group because there is often a limited supply of adequately sized housing to accommodate their needs. Generally, the more persons in a household, the more rooms are needed to accommodate that household. Specifically, to avoid being considered living in overcrowded conditions, a five-person household would require three or four bedrooms, a six-person household would require four bedrooms, and a seven-person household would require four to six bedrooms.

In Lake Forest, 2,852 households (9.9% of all households) have five or more persons as described in Table 21. Of the large households, 67.0% own their home and 33.0% rent. Typically, there are more owner-occupied large households that are cost burdened when compared to renter households and the population as a whole. However, the 2014-2018 ACS survey does not provide data regarding overpayment for large households. Table 36 compares the median income for households with five or more persons to the Citywide median income for 2018. For each large-family category, the median household income was higher versus the Citywide median of \$104,449.

TABLE 36: MEDIAN INCOME BY HOUSEHOLD SIZE (2018)

Size	Median Income
5-Person Households	\$152,095
6-Person Households	\$145,714
7 or More Person Households	\$124,087
Median Household Income (All Households)	\$104,449

Source: US Census, 2014-2018 ACS

Large families can have a difficult time finding housing units large enough to meet their needs. In Lake Forest, there appears to be a significant amount of both ownership housing and rental housing available to provide units with enough bedrooms for larger households. Table 37 identifies the number of large households by household size versus the number of large owner and rental units. While there are sufficient units in Lake Forest to accommodate large owner and renter households, it does not mean there is a match between housing units that exist and large families. As described in Table 20, 2.1% of owner-occupied homes and 10.7% of renter-occupied homes are overcrowded.

TABLE 37: HOUSEHOLD SIZE VERSUS BEDROOM SIZE BY TENURE (2018)

Tenure	3 BR Units	5 Person Households		4+ BR Units	6 Person and Larger Households	
		Households	Shortfall/ Excess		Households	Shortfall/ Excess
Owner	7,171	1,274	5,897	8,511	637	7,874
Renter	1,707	570	1,137	826	371	455

Source: US Census, 2014-2018 ACS

Large households typically require housing units with more bedrooms than needed by smaller households. In general, housing for these households should provide safe outdoor play areas for children and should be located to provide convenient access to schools and childcare facilities. These types of needs can pose problems particularly for large families that cannot afford to buy or rent single-family houses. It is anticipated that approximately 10% of the RHNA units will be needed to accommodate large households and an emphasis should be placed on ensuring rental units are available to large households.

SINGLE PARENT AND FEMALE-HEADED HOUSEHOLDS

Single parent households are households with children under the age of 18 at home and include both male- and female-headed households. These households generally have a higher ratio between their income and their living expenses (that is, living expenses take up a larger share of income than is generally the case in two-parent households). Therefore, finding affordable, decent, and safe housing is often more difficult for single parent and female-headed households. Additionally, single parent and female-headed households have special needs involving access to daycare or childcare, health care, and other supportive services.

While the majority of households in Lake Forest are either couples or single person households, 21.8% of family households are headed by a single male or single female. There are 1,226 male heads of household with no spouse present and 413 of these households have children under 18. There is a larger number of female householders with no spouse present – 3,378 households or 11.8% of family households – and 1,702 of these female-headed households have children under 18. Table 38 identifies single parent households by gender of the householder and presence of children.

The median income of female-headed households (no spouse present) is \$68,933, 17.4% less than the median income of a male-headed, no spouse present family (\$83,458) and 34.0% less than the median income of all households in the City (\$104,449). Approximately 3.2% of households are under the poverty level while 18.9% of female-headed households with related children under 18 years of age are under the poverty level.

TABLE 38: FAMILIES AND FEMALE HOUSEHOLDER WITH CHILDREN UNDER 18 (2018)

Category	Number	Percent
Total Families	21,128	100%
Male householder, no wife present	1,226	4.3%
With children under 18	413	1.4%
Female householder, no husband present	3,378	11.8%
With children under 18	1,702	5.9%

Source: US Census, 2014-2018 ACS

As Lake Forest's population and households grow, there will be a continued need for supportive services for single parent households with children present.

In addition, the creation of innovative housing for female-headed households could include co-housing developments where childcare and meal preparation responsibilities can be shared. The economies of scale available in this type of housing would be advantageous to this special-needs group as well as all other low-income household groups. Limited equity cooperatives sponsored by non-profit housing developers are another financing structure that could be considered for the benefit of all special-needs groups.

FARMWORKERS

Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Following changes in the area's economy, Orange County today is a mostly developed urban/suburban region with a strong local economy that is not tied to an agricultural base. While there are still active farming areas on the Irvine Ranch and in other cities, shifts in the County's economy to manufacturing, technology, and service-oriented sectors have significantly curtailed agricultural production. Furthermore, the only agricultural operation existing in Lake Forest in recent years – the 126-acre Nakase Brothers Wholesale Nursery, closed in 2020. The site was approved for redevelopment in January 2020. A master-planned community designed to include more than 540 housing units will be developed on the Nakase site.

The 2014-2018 ACS data estimates that only 140 (less than 1% of the working population) of Lake Forest's residents were employed in agriculture (or related industries – forestry, fishing and hunting, mining) in 2018. Given the limited active agriculture operations in and around the City, the number of residents employed in agriculture as opposed to those employed in forestry, fishing and hunting, or mining is likely to be smaller than 140. In addition, it is possible (although statistics are not available) that a number of active farmworkers are not full-time residents of Lake Forest and migrate into the area depending on seasonal crop harvest. [The United States Department of Agriculture \(USDA\) estimates that there were just 340 migrant farmworkers in Orange County in 2017. USDA estimates that 666 farmworkers worked seasonally \(hired for a period of less than 150 days\) in Orange County in 2017, while 1,106 farmworkers in Orange County were permanent \(hired for a period of greater than or equal to 150 days\).](#) Such farmworkers may find temporary housing by living with relatives, or short-term rental of a single unit for several families, resulting in overcrowded conditions.

Although there is not a significant need for farmworker housing in Lake Forest, the City allows agricultural uses within the A-1 and OS zones, and therefore farmworker housing must be allowed as an accessory use pursuant the California Employee Housing Act. The City revised the Zoning Code in June 2015 to comply with the California Employee Housing Act.

HOMELESS PERSONS

Government Code Section 65583(a)(7) requires that the Housing Element include an analysis of the needs of homeless persons and families. Homeless persons are defined as those who lack a fixed and adequate residence. People who are homeless may be chronically homeless (perhaps due to substance abuse or mental health issues) or situationally homeless (perhaps resulting from job loss or family strife). Homeless people face critical housing challenges due to their very low incomes and lack of appropriate housing. Thus, State law requires jurisdictions to plan to help meet the needs of their homeless populations.

The law also requires that each jurisdiction address community needs and available resources for special housing opportunities known as transitional and supportive housing. These housing types provide the opportunity for families and individuals to "transition" from a homeless condition to permanent housing, often with the assistance of supportive services to assist individuals in gaining necessary life skills in support of independent living.

Homeless Estimates

Counting the homeless population is problematic due to their transient nature; however, through the efforts of the Orange County Continuum of Care (CoC) estimates have been developed. The Orange County CoC is a consortium of individuals and organizations with the common purpose of developing and implementing a strategy to address homelessness in Orange County. The Orange County CoC is responsible for managing U.S. Department of Housing and Urban Development (HUD) funds for homelessness and is uniquely positioned to identify system needs and take steps to address them with the collaboration and partnership of community stakeholders.

As the primary coordinating body for homeless issues and assistance for the entire county, the Orange County CoC accomplishes a host of activities and programs vital to the County, including a biennial point-in-time “snapshot” survey to identify and assess the needs of both the sheltered and unsheltered homeless. Orange County’s 2019 Point-In-Time sheltered count took place the night of Tuesday, January 22, 2019. Emergency shelters and transitional housing programs collected client-level demographic information from individuals and families staying the night in each program. The 2019 Point-In-Time unsheltered count process took place over two days, Wednesday, January 23 and Thursday, January 24, to ensure the 800 square mile County jurisdiction was canvassed effectively.

The 2019 Point-In-Time Report identified 112 people in the City of Lake Forest experiencing homelessness, representing 1.6% of Orange County’s total homeless count (6,860 individuals). An estimated 76 (67.9%) of the 112 homeless individuals in Lake Forest were unsheltered and an estimated 36 (32.1%) were sheltered. From the 2017 to the 2019 Homeless Count, there was an increase of homeless individuals counted in Orange County from 4,792 to 6,860, which is a 43% increase. This has been a greater increase in the County of homeless counts compared to previous years. In comparison, from 2015 to 2017, there was a 14% increase in the homeless count in Orange County. Primarily, the increase from 2017 to 2019 in the County was unsheltered individuals, which increased from 2,584 individuals in 2017 to 3,961 individuals in 2019.

Housing Accommodations

In 2013, the City amended the Zoning Code to allow 1) emergency shelters by right in the City’s industrial zoning districts, subject to compliance with objective standards consistent with the requirements identified in Government Code Section 65583(a)(4), and 2) transitional and supportive housing by right in all residential zoning districts and subject only to the same requirements for residential uses of the same type (e.g., single-family or multi-family) in the same zone. The Housing Plan includes policies and programs directed to encourage the provision of housing and services for the homeless population as well as persons and households at-risk of homelessness.

Currently (2021), there are several transitional housing units operating in the City. Lake Forest also supports a regional effort among the various local agencies making up the South Service Planning Area of Orange County, which includes 12 cities (Lake Forest, Aliso Viejo, Dana Point, Irvine, Laguna Beach, Laguna Hills, Laguna Niguel, Laguna Woods, Mission Viejo, Rancho Santa Margarita, San Clemente, and San Juan Capistrano).

The most recent inventory of resources available within Orange County for emergency shelters, transitional housing, and permanent supportive housing units comes from the 2019 Housing Inventory reported to HUD by the Orange County CoC. Table 39 shows the total number of beds offered by homeless facilities in the Orange County CoC area.

TABLE 39: HOMELESS FACILITIES (2019)*

Facility Type	Orange County CoC Region			
	Family Units	Family Beds	Adult-Only Beds	Total Year-Round Beds
Emergency Shelter	170	574	1,401	1,989
Transitional Housing	272	816	289	1,105
Permanent Supportive Housing	213	518	1,725	2,243
Rapid Re-Housing	149	615	159	774
Other Permanent Housing	8	16	92	108
TOTAL UNITS/BEDS	812	2,539	3,666	6,219

*Numbers are for the total Orange County Continuum of Care region for which Lake Forest is a participating member

Source: HUD 2019 Continuum of Care Homeless Assistance Programs, Housing Inventory Count Report

- **Emergency Shelters** – Six emergency shelters are available to provide services in the South Service Planning Area of the CoC jurisdiction – CSP Youth Shelter (Laguna Beach), Cold Weather Shelter (Laguna Beach), Friendship Shelter (Laguna Beach), Gilchrist House (San Clemente), Human Options (Irvine), and Laura's House (San Clemente). According to the HUD 2019 Continuum of Care Housing Inventory Count Report for the Orange County CoC, a total of 1,989 year-round emergency shelter beds and 400 seasonal beds are available in the Orange County CoC region. During the 2019 point-in-time survey, the CoC found that the average occupancy for emergency shelter beds was 79.2%.
- **Transitional Housing** – Sometimes referred to as “bridge” housing, provides housing accommodations and support services for persons and families, but restricts occupancy to no more than 24 months. In the Orange County CoC region, a total of 1,105 transitional housing beds are provided. Transitional housing providers nearest to Lake Forest include Families Forward, Friendship Shelter, Henderson House, Hope's House, Gilchrist House, Kathy's House, Laura's House, South County Outreach, and Toby's House. The 2019 point-in-time survey found that the average occupancy for transitional housing beds was 78.2% at the time of the survey.
- **Permanent Supportive Housing** – Supportive housing has no limit on length of stay and is linked to onsite or offsite services that assist residents in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community. A total of 2,243 permanent housing beds are provided in the Orange County CoC region.
- **Rapid Re-Housing** – Rapid re-housing provides short-term rental assistance and services. The goals are to help people obtain housing quickly, increase self-sufficiency, and stay housed.
- **Other Permanent Housing** – Consists of permanent housing with services (no disability required for entry) and permanent housing with housing only.

Assessment of Need

Based on the available information, there is a countywide homeless population of 6,860 persons but only 6,219 beds, indicating an unmet demand for 641 homeless persons. It is noted that the 2019 Point-in-Time survey identified 2,899 sheltered homeless persons and 3,961 unsheltered homeless persons (36 sheltered and 76 unsheltered for Lake Forest). The discrepancy between sheltered homeless persons and the County's total capacity to house homeless persons indicates a need for additional community services resources to assist and match the homeless population with the Countywide shelter and housing resources. Overall, the average bed-utilization rate for emergency shelters is 79.2% and is 78.2% for transitional housing, according to the Point-in-Time survey information. Although there are seasonal fluctuations in bed counts, these figures demonstrate a demand for supportive housing.

3I. Units at Risk of Conversion

ASSISTED HOUSING AT RISK OF CONVERSION

California housing element law requires jurisdictions to provide an analysis of low-income, assisted multi-family housing units that are eligible to change from low-income housing uses during the next 10 years (2021-2031) due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use (Government Code 65583). These units risk the termination of various subsidy groups which could convert certain multifamily housing from affordable to market rate. State law requires housing elements to assess at-risk housing in order to project any potential loss of affordable housing.

The California Housing Partnership (CHP) provides data on assisted housing units, including those in Lake Forest.

Table 40 indicates the extent of subsidized multifamily rental housing in the City, the subsidy programs that are in place for each project, and the likelihood of current housing assisted projects to convert to market rate projects

that would not provide assistance to lower income residents. The City has identified 11 units at-risk of conversion during the next 10 years (2 at moderate risk, 8 at high risk, and 1 at very high risk).

TABLE 40: SUMMARY OF AT-RISK SUBSIDIZED HOUSING UNITS

Project/Address	No. & Type of Units	Type of Subsidy	Current Owner	Earliest Date of Conversion	Risk
Shelter for The Homeless (formerly American Family Housing) 20927 Serrano Creek Road	1 / affordable	CDBG	Shelter for The Homeless	2024	High
Saguaro Apartments 23201 Saguaro Street	4 / affordable	Purchased from Lake Forest Housing Authority	Families Forward	2071	Low
SCO Transitional Housing Condo Units	1 / transitional	CDBG	South County Outreach	2022	Very High
	1 / transitional	CDBG		2023	High
	2 / transitional	CDBG		2024	High
	2 / transitional	CDBG		2025	High
	2 / transitional	CDBG		2026	High
Madrid Transitional Housing Condo Units 22702, 22706 Madrid Drive	2 Family	Redevelopment Agency Housing Set-Aside Unreserved Funds		2030	Moderate
The Arroyo at Baker Ranch 100 Indigo Place	187 Family	LIHTC	Meta Housing Corporation	2069	Low

Sources: California Housing Partnership, January 2021; SCAG 6th Cycle Data Package

PRESERVATION OPTIONS

Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. The following discussion highlights ways that the City's eight very high- or high-risk units (SCO Transitional Housing Condo Units) could be preserved as affordable housing. All of the presented alternatives are costly and beyond the ability of the City of Lake Forest to manage without large amounts of subsidy from federal and/or state resources.

Option 1: Replacement Through New Construction of Replacement Units

The construction ~~of~~ of new lower income housing units is a means of replacing the at-risk units should they be converted to market-rate. The cost of developing new housing depends on a variety of factors such as density, size of units, location and related land costs, and type of construction. Assuming an average development cost of ~~\$200,350,000~~ per unit for condominium housing, replacement of the ~~8~~ 11 at-risk units would require approximately ~~\$1,600,000~~ \$3,850,000, excluding land costs, which vary depending upon location.

Purchase of Replacement Units

~~One preservation option is for a non-profit organization to purchase similar units. By purchasing similar units, a non-profit organization can secure lower-income restrictions and potentially enable the project to become eligible for a greater range of governmental assistance. The cost of purchasing similar units depends on a number of factors, including the market conditions at the time, occupancy rate, and the physical condition of the units to be acquired.~~

Current market value for the at-risk units is estimated on the basis of the units' potential annual income, and operating and maintenance expenses. The estimated market value of Lake Forest's current stock of at-risk affordable housing is \$2,500,000. This estimate is provided for the purpose of comparison and understanding the magnitude of costs involved and does not represent the precise market value of the at-risk units or units that could be purchased to offset converted units. The actual market value at time of sale would depend on market and property conditions, lease-out/turnover rates, among other factors.

Option 2: Purchase of Affordability Covenants

Another option to preserve the affordability of at-risk projects is to provide an incentive package to the owners to maintain the projects as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, and/or supplementing the subsidy amount received to market levels.

To purchase the affordability covenant on these projects, an incentive package should include interest subsidies at or below what the property owners can obtain in the open market. To enhance the attractiveness of the incentive package, the interest subsidies may need to be combined with rent subsidies that supplement the HUD fair market rent levels.

Option 3: Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. Rent subsidies using alternative State or local funding sources could be used to maintain affordability. Subsidies could be structured similar to the Section 8 program, where HUD pays the owners the difference between what tenants can afford to pay (30% income) and what HUD establishes as the Fair Market Rent. The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent (FMR) for a unit minus the housing cost affordable by a very low-income household. Approximately ~~\$5,256,105~~ in rent subsidies would be required monthly (or ~~\$36,072,260~~ annually). Assuming a 20-year affordability period, the total subsidy is about ~~\$1,261,440~~ \$1,465,000, and assuming a 55-year affordability period, the total subsidy is about \$4,029,300. .

Cost Comparisons

In terms of cost effectiveness for preservation of the 11 at-risk units, 55 years' worth of rent subsidies (\$4 million) is fairly comparable to the cost of construction of replacement units (\$3.85 million); however the cost identified to construct replacement units excludes the price of land, which can add a significant expense to the overall project. While the cost of purchasing the affordability covenants is unknown, it is possible that it would provide a cost-effective strategy for preserving the at-risk units and should be explored further to support the City's preservation objectives. The following are strategies the City will undertake to work towards preservation of the 11 at-risk units in these projects:

- Monitor At-Risk Units: Contact property owners within at least one year of the affordability expiration date to discuss City's desire to preserve as affordable housing.
- Explore Funding Sources/Program Options: As necessary, contract with the California Housing Partnership Corporation to explore outside funding sources and program options for preservation.
- Purchase of Affordability Covenants: Proactively identify potential partners interested in purchasing and extending expiring affordability covenants.
- Tenant Education: Property owners are required to give a twelve-month notice of their intent to opt out of low-income use restrictions. The City will work with tenants, and as necessary contact specialists like the California Housing Partnership to provide education regarding tenant rights and conversion procedures.

ESTIMATES OF HOUSING NEED

Several factors influence the degree of demand, or "need," for housing in Lake Forest. The major needs categories considered in this element include:

- Housing needs resulting from the overcrowding of units
- Housing needs that result when households pay more than they can afford for housing
- Housing needs of "special needs groups" such as elderly, large families, female-headed households, households with a disabled person, farm workers, students, and the homeless

State law requires that cities quantify existing housing need in their Housing Element.

Table 41 summarizes those findings.

TABLE 41: SUMMARY OF NEEDS

Summary of Households/Persons with Identified Housing Need	Percent of Total City Population/Households
Households Overpaying for Housing:	
% of Renter Households Overpaying	50.6%
% of Owner Households Overpaying	28.1%
% of Extremely Low income Households (0-30% AMI) Overpaying	80.5%
% of very low income Households (0-30% AMI) Overpaying	76.6%
% of Low income Households (0-30% AMI) Overpaying	63.7%
Overcrowded Households	
% of Overcrowded Renter Households	10.7%
% of Overcrowded Owner Households	2.1%
% of All Overcrowded Households	4.8%
Special Needs Groups:	
Elderly Households	13.1% of pop. 21.2% of households
Disabled Persons	7.1% of pop.
Developmentally Disabled Persons	0.5% of pop
Large Households	9.9% of households
Female Headed Households	11.8% of households
Female Headed Households with Children	5.9% of households
Farmworkers	0.2% of labor force
Homeless	112 persons (2019)
Affordable Housing Units At-Risk of Conversion to Market Rate Costs	8 11

Source: US Census, 2014-2018 ACS; Orange County Regional Analysis of Impediments to Fair Housing Choice

4. Constraints

Constraints to housing development are defined as government measures or non-governmental conditions that limit the amount or timing of residential development.

Government regulations can constrain the supply of housing available in a community if the regulations limit the opportunities to develop housing, impose requirements that unnecessarily increase the cost to develop housing, or make the development process so arduous as to discourage housing developers. State law requires housing elements to contain an analysis of the governmental constraints on housing maintenance, improvement, and development (Government Code Section 65583(a)(4)).

Non-governmental constraints (required to be analyzed under Government Code Section 65583(a)(5)) may include land prices, construction costs, and financing. While local governments cannot control prices or costs, identification of these constraints can be helpful to Lake Forest in formulating housing programs.

4A. Governmental Constraints

Housing affordability is affected by factors in both the private and public sectors. Actions by the City can have an impact on the price and availability of housing in Lake Forest. Land use controls, site improvement requirements, building codes, fees, and other local programs intended to improve the overall quality of housing may also serve as a constraint to housing development. These governmental constraints can limit the operations of the public, private, and non-profit sectors, making it difficult to meet the demand for affordable housing and limiting supply in a region. All City zoning regulations, development standards, specific plans, and fees are posted online and available to the public, consistent with the [transparency](#) requirements of AB 1483. [Upon adoption of new mixed-use zoning, updated information and maps will continue to be made available online in accordance with transparency requirements.](#)

LAND USE CONTROLS

Local land use policies and regulations impact the price and availability of housing, including affordable housing. This section discusses the General Plan land use designations and provisions in the Zoning Code that specify the types of housing allowed within Lake Forest as a potential governmental constraint.

General Plan

The General Plan Land Use Element establishes land use designations that specify the allowed types, locations, and intensities or densities of land uses in the City. The Zoning Code (Title 9 of the Municipal Code) implements the General Plan by providing land use regulations and development standards for each zoning district.

Table 42 shows General Plan residential land uses designations, the most common corresponding zoning designation(s), and permitted densities allowed for housing as specified in the General Plan.

FINAL DRAFT

TABLE 42: GENERAL PLAN RESIDENTIAL LAND USE DESIGNATIONS

General Plan Designation ¹	Description	Zoning District
Very Low Density Residential (VLDR)	Provide for development of single-family dwellings and accessory buildings. Allows a density of 0-2 du/ac.	R1 – Single-Family Residential District RS – Residential Single-Family District
Low Density Residential (LDR)	Provide for development of single-family dwellings and accessory buildings. Allows a density of 2-7 du/ac.	R1 – Single-Family Residential District RS – Residential Single-Family District
Low-Medium Density Residential	Provides for development of a wide range of living accommodations, including single-family detached and attached dwelling units, mobile homes, duplexes, and multiple-family dwellings, such as townhomes, condominiums, apartments, and cooperatives. Allows a density of 7-15 du/ac	R4 – Suburban Multi-Family Residential District RP – Residential Professional District
Medium Density (MDR) Residential	For the development of a wide range of living accommodations, including single-family dwellings, and multiple-family dwellings, such as townhomes, condominiums, apartments, and cooperatives. This designation allows for a density of 15-25 du/ac.	R2 – Multi-family Dwelling District
High-Density Residential (HDR)	For the development of a wide range of living accommodations, including single-family dwelling units and multiple-family dwellings, such as townhomes, condominiums, apartments, and cooperatives. This designation allows a density of 25 – 43 du/ac.	R2 – Multi-family Dwelling District
Mixed-Use 32 (MU-32)	For mixtures of commercial, office, and residential uses in the same building, on the same parcel of land, or within the same area. This designation allows a maximum density of 32 du/ac.	R2 – Multi-family Dwelling District1
Mixed-Use 43 (MU-43)	For mixtures of commercial, office, and residential uses in the same building, on the same parcel of land, or within the same area. This designation allows a maximum density of 43 du/ac.	R2 – Multi-family Dwelling District1
Urban Industrial 25 (UI-25)	For a mix of traditional light industrial and commercial uses, as well as live-work units and home-based businesses. This designation allows a maximum density of 25 du/ac.	R2 – Multi-family Dwelling District1
Urban Industrial 43 (UI-43)	For a mix of traditional light industrial and commercial uses, as well as live-work units and home-based businesses. This designation allows a maximum density of 43 du/ac.	R2 – Multi-family Dwelling District1

1. The City is preparing new mixed-use zoning standards to implement the mixed-use land use designations identified in the General Plan. New mixed-use zoning for these areas will be adopted by early 2022 and will be consistent with the densities set forth by land use designations in the General Plan. Until the adoption of new mixed-use development standards, the current zoning standards apply.

2. The City has numerous zones associated with its Planned Communities, as described below. Zones contained within a Planned Community must be consistent with the General Plan Land Use Designation and provide standards specific to the Planned Community.

Sources: City of Lake Forest General Plan, 2020; City of Lake Forest Zoning Code, 2021

Planned Communities

Much of the land use in Lake Forest is based on pre-incorporation planning for ten largescale Planned Communities (PCs). The existing PCs include Baker Ranch, El Toro, Foothill Ranch, Lake Forest, Nakase, Pacific Commercentre, Portola Hills, Rancho de Los Alisos, Rancho Serrano, and Serrano Highlands. Several of these PCs are the subject of development agreements that specify the density of development allowed. Future development in these areas must comply with the PC District regulations and any applicable development agreement.

Many of the development standards found in the PCs are similar to the R1 and RS zoning found in the City's Zoning Code. Two of the largest PCs, Lake Forest PC and Rancho De Los Alisos PC, allow for smaller and more flexible side yard setbacks and allow for cluster development. Several PCs include a "High Density Residential" or "Heavy Density Residential" zone, which allow a variety of multi-family residential uses. The Baker Ranch, Foothill Ranch, and Portola Hills Planned Communities have mixed-use zones.

Zoning Code

Land use policies in the General Plan are implemented primarily through the Zoning Code. The Zoning Code provides for a range of densities and residential uses and is designed to protect and promote the health, safety, and general welfare of residents, which includes preserving the character and integrity of established residential neighborhoods. To that end, the City has established specific development standards that apply to residential construction in various districts. These may include, but are not limited to, density, lot coverage, building height, parking standards, and other requirements. The City initiated an update to its Zoning Code in early 2021 to develop new mixed-use zoning standards to implement the City's 2040 General Plan. These standards will be adopted by early 2022.

[Table 43 through Table 53 show development standards in the Zoning Code.](#)

TABLE 43: RESIDENTIAL ZONING DISTRICTS FROM ZONING CODE

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Area (sq ft) per Unit
	Front	Side	Rear	Side	Rear						
R1	20	5	25	5	25 or D	10	7,200	N/A	35	N/A	N/A
R2	20	5	25	5	25 or D	10	7,200	10	35	N/A	1,000
R4	20	5	25	5	25 or D	10	7,200	15	35	N/A	3,000
RP	20	5	25	5	25	10	7,200	N/A	35	N/A	3,000
RS	10*	10	10	C	0	10	7,000	N/A	35	35%	N/A
A1	20	5	25	5	25 or D	10	4 acres	N/A	35	N/A	N/A

Source: City of Lake Forest

Notes:

* - Garages must be a minimum of 20' from R.O.W. or back of sidewalk, whichever is closer (Section 7-9-137.1)

A – Ten (10) percent of average ultimate net width of building site - Maximum twenty (20) feet.

B – Five (5) feet; and one (1) foot for each additional story over two (2).

C – Ten (10) feet one (1) side only or ten (10) feet total of two (2) sides combined.

D – In computing the depth or a rear setback from any building where such setback opens on an alley, private street, public park or public beach, one-half of the width of such alley, street park or beach may be deemed to be a portion of the rear setback, except that under this provision, no rear setback shall be less than fifteen (15) feet.

TABLE 44: BAKER RANCH PLANNED COMMUNITY

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Area (sq ft) per Unit
	Front	Side	Rear	Side	Rear						
Residential Single-Family Dwellings	10 or M	10	10	5	5	N/A	2,000	10	35	70%	N/A
Residential Multi-Family Dwellings	10	10	10	5	5	N/A	N/A	10	40 or N	80%	N/A
Mixed Use	See setbacks for single-family and multi-family					N/A	N/A	10	60 feet or four stories or P	N/A	N/A

Source: City of Lake Forest

Notes:

M - [A minimum 8 foot setback is required from building elevations with a front entry.](#)

N - [Planning Area 5B has a 35 foot maximum height.](#)

P - [A single family dwelling unit has maximum height of 35 feet.](#)

TABLE 45: EL TORO PLANNED COMMUNITY

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Area (sq ft) per Unit
	Front	Side	Rear	Side	Rear						
HIDR1	20	5	25	5	25 or D	10	7,200	10	35	N/A	1,000

Source: City of Lake Forest

Notes: Condominium projects and community or cooperative apartment complexes shall comply with site development standards established by the required Use Permit.

D – In computing the depth or a rear setback from any building where such setback opens on an alley, private street, public park or public beach, one-half of the width of such alley, street park or beach may be deemed to be a portion of the rear setback, except that under this provision, no rear setback shall be less than fifteen (15) feet.

TABLE 46: FOOTHILL RANCH PLANNED COMMUNITY

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Area (sq ft) per Unit
	Front	Side	Rear	Side	Rear						
<u>Detached (conventional)</u>	<u>5*</u>	<u>10</u>	<u>10</u>	<u>C</u>	<u>10</u>	<u>N/A</u>	<u>3,000</u>	<u>N/A</u>	<u>35</u>	<u>N/A</u>	<u>N/A</u>
<u>Attached Single-Family Dwelling</u>	<u>5*</u>	<u>10</u>	<u>5</u>	<u>0</u>	<u>0</u>	<u>N/A</u>	<u>2,000</u>	<u>N/A</u>	<u>35</u>	<u>N/A</u>	<u>N/A</u>
<u>Cluster Subdivision</u>	<u>E</u>						<u>N/A</u>	<u>N/A</u>	<u>35</u>	<u>70%</u>	<u>N/A</u>
<u>Multiple-Family Dwellings (Apartments & Condominiums)</u>	<u>E</u>						<u>5,000</u>	<u>N/A</u>	<u>N/A</u>	<u>60%</u>	<u>1,000</u>

Source: City of Lake Forest

Notes:

* Garage and carport placement – The point of vehicular entry to a garage or carport shall be a distance of five (5) feet or less, or eighteen (18) feet or more from the back of sidewalk, or if there is no sidewalk, from the back of curb. Automatic garage door openers are required for garages set back less than eighteen (18) feet to the point of vehicular entry.

C - Ten (10) feet one (1) side only or ten (10) feet total of two (2) sides combined.

E - 10' from any exterior boundary line of the project. No setback from any individual building site's property line development unit or lot except as required to comply with the UBC; Multiple-Family Dwellings require 25' minimum from property lines abutting single family residential areas.

TABLE 47: LAKE FOREST PLANNED COMMUNITY

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Area (sq ft) per Unit
	Front	Side	Rear	Side	Rear						
Medium Density Residential (MDR)	10*	10	10	C	0	N/A	5,000	N/A	35	60%	5,000
MDR (Planning Areas 12 & 19)	10*	0	0	0	0	N/A	5,000	N/A	35	60%	5,000
High Density Residential (HIDR) - Single Family Residential (SFR)	10*	10	10	G	G	N/A	5,000	N/A	35	60%	5,000
HIDR – Multiple- Family Residential	F, G, J					N/A	N/A	N/A	60	60%	2,400
Heavy Density Residential (HEDR) – Multiple Family Residential	F, G, J					N/A	N/A	N/A	35	60%	2,400
HEDR – SFR	10*	10	10	C	0	N/A					

Source: City of Lake Forest

Notes:

* Garages must be a minimum of 20' from R.O.W. or back of sidewalk, whichever is closer.

C - Ten (10) feet one (1) side only or ten (10) feet total of two (2) sides combined

F - The minimum setback distance between any building or structure and street right-of-way or back of sidewalk shall be 10'.

G - The minimum side and rear setback is 0', except 5' setback from property line between detached adjacent structures or single-dwelling units.

H - 10' from any exterior boundary line of the project. No setback from any individual building site's property line development unit or lot; except as required to comply with the UBC.

J - When there is a difference in elevation of 3' or more between adjacent building pads on lots having a common side property line, "R1" side yard regulations shall apply to that common side yard only.

TABLE 48: NAKASE PLANNED COMMUNITY

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Area (sq ft) per Unit
	Front	Side	Rear	Side	Rear						
<u>N1- Garden Clusters</u>	<u>8 or Q</u>	<u>10</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>N/A</u>	<u>2,500</u>	<u>10</u>	<u>40</u>	<u>70%</u>	<u>N/A</u>
<u>N2- Sky Terraces</u>	<u>5</u>	<u>10</u>	<u>10 or R</u>	<u>5</u>	<u>R</u>	<u>N/A</u>	<u>2,800</u>	<u>10</u>	<u>40</u>	<u>70%</u>	<u>N/A</u>
<u>N3- Cottages Homes</u>	<u>8</u>	<u>10</u>	<u>S</u>	<u>5</u>	<u>S</u>	<u>N/A</u>	<u>3,525</u>	<u>10</u>	<u>35</u>	<u>70%</u>	<u>N/A</u>
<u>N4- Traditional Single Family</u>	<u>8</u>	<u>10</u>	<u>T</u>	<u>5</u>	<u>T</u>	<u>N/A</u>	<u>4,400</u>	<u>10</u>	<u>40</u>	<u>70%</u>	<u>N/A</u>
<u>N5- Estates Homes</u>	<u>8</u>	<u>10</u>	<u>U</u>	<u>5</u>	<u>U</u>	<u>N/A</u>	<u>2,944</u>	<u>10</u>	<u>40</u>	<u>70%</u>	<u>N/A</u>
<u>Attached Multi-Family</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>Q</u>	<u>Q</u>	<u>N/A</u>	<u>N/A</u>	<u>15 or V</u>	<u>N/A 50</u>	<u>60% or W</u>	<u>N/A</u>

Source: City of Lake Forest

Notes:Q - The minimum front setback from a private court or motor court is 3 feet.R - 5 feet/15 feet , with a minimum 35% of the rear elevation at 15 foot setbackS - 5 feet/15 feet , with a minimum 35% of the rear elevation at 15 foot setback.T - 5 feet/15 feet , with a minimum 45% of the rear elevation at 15 foot setback.U - 5 feet/10 feet , with a minimum 45% of the rear elevation at 10 foot setback.V - Entry door to front door requires a 20 foot minimum separation.W - If attached garages are included in the project then 70% lot coverage allowed.

TABLE 49: PORTOLA HILLS PLANNED COMMUNITY

<u>Zoning District</u>	<u>Setbacks (ft) From Ultimate Street R.O.W.</u>			<u>Setbacks (ft) from property line not abutting a street</u>		<u>Setbacks Panhandle building site from any property line</u>	<u>Minimum Lot Size (sq ft)</u>	<u>Minimum distance (ft) between Principal Structures</u>	<u>Maximum Building Height (ft)</u>	<u>Maximum Lot Coverage</u>	<u>Area (sq ft) per Unit</u>
	<u>Front</u>	<u>Side</u>	<u>Rear</u>	<u>Side</u>	<u>Rear</u>						
<u>Detached SFD (rural estate)</u>	<u>20</u>	<u>8</u>	<u>25</u>	<u>8</u>	<u>25</u>	<u>N/A</u>	<u>1 acre</u>	<u>N/A</u>	<u>35</u>	<u>N/A</u>	<u>N/A</u>
<u>Detached SFD (conventional)</u>	<u>10*</u>	<u>10</u>	<u>10</u>	<u>C</u>	<u>10</u>	<u>N/A</u>	<u>3,000</u>	<u>N/A</u>	<u>35</u>	<u>N/A</u>	<u>N/A</u>
<u>Attached SFD (conventional)</u>	<u>10*</u>	<u>10</u>	<u>10</u>	<u>0</u>	<u>0</u>	<u>N/A</u>	<u>2,000</u>	<u>N/A</u>	<u>35</u>	<u>N/A</u>	<u>N/A</u>
<u>Cluster Subdivision</u>	<u>E</u>						<u>N/A</u>	<u>N/A</u>	<u>35</u>	<u>70%</u>	<u>N/A</u>
<u>Multiple-Family Dwellings (Apartments & Condominiums)</u>	<u>E</u>						<u>5,000</u>	<u>N/A</u>	<u>35 or K</u>	<u>60%</u>	<u>1,000</u>

Source: City of Lake Forest

Notes:

* Garage and carport placement – The point of vehicular entry to a garage or carport shall be a distance of five (5) feet or less, or eighteen (18) feet or more from the back of sidewalk, or if there is no sidewalk, from the back of curb. Automatic garage door openers are required for garages set back less than eighteen (18) feet to the point of vehicular entry.

C – Ten (10) feet one (1) side only or ten (10) feet total of two (2) sides combined.

E – 10' from any exterior boundary line of the project. No setback from any individual building site's property line development unit or lot except as required to comply with the UBC; Multiple-Family Dwellings require 20' minimum setback from any exterior property lines.

K – Sub-Planning Areas F1 and F2 of the Portola Hills Area Plan have a maximum height of 45 feet.

TABLE 50: RANCHO DE LOS ALISOS PLANNED COMMUNITY

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Units/ Acre
	Front	Side	Rear	Side	Rear						
Low Density Residential (LDR)	10*	10	10	0	0	N/A	7,000	N/A	35	50%	2
Medium Density Residential (MDR) – Single Family Residential (SFR)	10*	10	10	0	0	N/A	3,000	N/A	35	60%	9
MDR – other than SFR	20	5	25	5	25 or D	N/A	3,000	N/A	35	60%	9
High Density Residential (HIDR)	10*	10	10	0	0	N/A	3,000	N/A	35	60%	18
Heavy Density Residential (HEDR)	10*	10	10	0	0	N/A	3,000	N/A	60	60%	30

Source: City of Lake Forest

Notes: Additional building setbacks: a) The minimum setback from arterial highways for all buildings shall be 25' plus 5' for each story above 2 stories. b) The minimum setback between single family and multiple family main buildings or mobile homes shall be 25' plus 5' for each story above 2 stories of the multiple family building.

* Garages must be a minimum of 20' from R.O.W. or back of sidewalk, whichever is closer (Section 7-9-137.1)

C – Ten (10) feet one (1) side only or ten (10) feet total of two (2) sides combined.

D – In computing the depth or a rear setback from any building where such setback opens on an alley, private street, public park or public beach, one-half of the width of such alley, street park or beach may be deemed to be a portion of the rear setback, except that under this provision, no rear setback shall be less than fifteen (15) feet.

TABLE 51: RANCHO SERRANO PLANNED COMMUNITY

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Area (sq ft) per Unit
	Front	Side	Rear	Side	Rear						
Medium Density Residential (MDR)	20*	10	10	C	0	10	7,000	N/A	35	35%	N/A

Source: City of Lake Forest

Notes:

* Garage and carport placement – The point of vehicular entry to a garage or carport shall be a distance of five (5) feet or less, or twenty (20) feet or more from the back of sidewalk, or if there is no sidewalk, from the back of curb. Automatic garage door openers are required for garages set back less than five (5) feet to the point of vehicular entry.

C – Ten (10) feet one (1) side only or ten (10) feet total of two (2) sides combined.

TABLE 52: SERRANO HIGHLANDS PLANNED COMMUNITY

Zoning District	Setbacks (ft) From Ultimate Street R.O.W.			Setbacks (ft) from property line not abutting a street		Setbacks Panhandle building site from any property line	Minimum Lot Size (sq ft)	Minimum distance (ft) between Principal Structures	Maximum Building Height (ft)	Maximum Lot Coverage	Units/ Acre
	Front	Side	Rear	Side	Rear						
Medium Density Residential (MDR) – Conventional Subdivision	10*	10	10	0	0	N/A	5,000	N/A	35	50%	5
Medium Density Residential (MDR) – Planned Concept Subdivision	10*	10	10	0	0	N/A	N/A	N/A	35	N/A	5
High Density I Residential (HIDR1)	10*	0	0	0	0	N/A	N/A	N/A	35 or L	60%	13
High Density II Residential (HIDR2)	10*	0	0	0	0	N/A	N/A	N/A	35 or L	60%	18

Source: City of Lake Forest

Notes:

* Garage and carport placement – The point of vehicular entry to a garage or carport shall be a distance of five (5) feet or less, or twenty (20) feet or more from the back of sidewalk, or if there is no sidewalk, from the back of curb. Automatic garage door openers are required for garages set back less than five (5) feet to the point of vehicular entry.

L- Unless a greater height is specifically approved on the site plan by the Planning Commission.

Flexibility in Development Standards

The City's Municipal Code includes different processes that would allow for housing developers to either create new development standards or to deviate from existing development standards, as follows: .

- The City has a Planned Development overlay zoning district that allows deviation from specific development standards for planned development projects. (Lake Forest Municipal Code Section 9.124)
- Many of the City's Planned Communities include a process for an alternative development standards. (Baker Ranch Planned Community, Foothill Ranch Planned Community, Nakase Planned Community, and Portola Hills Planned Community)
- An Area Plan is required for larger residential developments. The Area Plan process allows for the creation of development standards for the specific housing development (Lake Forest Municipal Code Section 9.184.020).
- For affordable housing projects, the City allows incentives, which usually include deviations from development standards, and density bonuses (Lake Forest Municipal Code Chapter 9.152).

Analysis of Land Use Controls

The City has considered and analyzed all relevant land use controls as potential constraints on a variety of housing types, both independently and cumulatively with other land use controls. This analysis, as outlined above, includes reviewing current General Plan guidance (updated in 2020), and existing zoning standards including standards identified for the City's Planned Communities.

As previously mentioned, the City adopted new mixed-use land use districts as part of its comprehensive General Plan Update in 2020 and is currently preparing mixed-use zoning standards to implement the densities identified for these land use categories. The City has included Program 1 as part of the Housing Plan to commit the City to prepare, adopt, and implement new zoning standards consistent with the densities and intensities identified in the General Plan. At this time, if an application was to be submitted for a site designated for mixed-use with no applicable zoning standards, the City would work with the applicant to prepare specific Planned Community standards for the site and/or a Specific Plan which would set customized zoning consistent with the land use parameters identified in the General Plan. The City is committed to allowing the densities and intensities identified for mixed-use development even as the final zoning standards are being prepared. Given this commitment and the City's inclusion of specific programs in the Housing Plan which commit the City to complete the rezoning process, the City finds that its current land use controls do not impact the ability to achieve the densities identified in the sites inventory.

PROVISIONS FOR A VARIETY OF HOUSING TYPES

State housing element law requires that jurisdictions facilitate and encourage a range of housing types for all economic segments of the community. This includes housing to meet the needs of a variety of households with incomes ranging from low to above-moderate. The Housing Element is the City's plan for achieving this objective.

As shown in

Table 53, the City's Zoning Code accommodates a wide variety of conventional and special needs housing, including single-family dwellings, duplexes, multifamily, ADUs, manufactured housing, mobile home parks, community care facilities (small and large), and transitional and supportive housing. Please note that the information contained in this Table represents accurate information only at the time of the Housing Element's preparation; future amendments and modifications to the Zoning Code may change the information in this Table. All interested parties should refer directly to the Zoning Code to ensure that the most accurate information is considered.

FINAL DRAFT

TABLE 53: PERMITTED RESIDENTIAL USES BY ZONE

Housing Type	Residential District				Commercial District	Urban Activity District	Light Industrial District	Agricultural District
	R1	RS	R2/R4	RP	C2/CC	UA	M1	A1
Conventional Housing								
Single-Family								
--Detached	P	P	P	P	--	--	--	P
--Attached	--	--	P	--	--	--	--	--
Two-Family Dwelling (Duplex) ¹	--	--	P	--	--	--	--	--
Multifamily ¹								
--Four or fewer units	--	--	P	U	--	--	--	--
--Five or more units	--	--	SD	--	--	--	--	--
Manufactured Housing	P	P	P	P	--	--	--	P
Mobile Home Park	-	-	U	U	--	--	--	--
Accessory Dwelling Unit (Second Unit)	P	P	P	P	--	--	--	P
Special Needs Housing								
Community Care Facility								
--6 or fewer clients	P	P	P	P	--	--	--	P
--7-12 clients	-	-	-	-	--	--	--	U
Congregate Care Facility (12 or more persons)	--	--	U	--	U	U	--	--
Emergency Shelter	--	--	--	--	--	--	P	--
Transitional Housing	P/ U	P/U/ SD	P/U/S D	P/ U	--	--	--	--
Supportive Housing	P/ U	P/U/ SD	P/U/S D	P/ U	U	U	--	P/U
Single Room Occupancy	--	--	--	--	SD	SD	--	--

Source: City of Lake Forest Zoning Code, 2021

Notes: "P" = Permitted; "U" = Use Permit; "SD" = Site Development Permit; and "--" = Not Permitted

1. Condominium projects require a use permit

Single-Family: Detached single-family dwellings are permitted by right within the R1, RS, R2, R4, RP, and A1 zones. Attached single-family dwellings, which are units that are attached side by side and separated by a property line aligned with the shared wall, are allowed within the R2/R4 zones. Single-family projects are subject to a ministerial review.

Multifamily: Multifamily developments with four or fewer units are permitted in the R2/R4 zones by right, and permitted in the RP district subject to a Use Permit. Multifamily developments with five or more units are permitted in the R2/R4 zones subject to Site Development Permit. Multifamily projects with four or fewer units are subject to administrative plan review. For projects with five or more units, a Site Development Permit is required.

Accessory Dwelling Unit (ADU): Government Code Section 65852.2(a)(1) allows local agencies to designate areas within a city where accessory dwelling units (ADU) may be permitted and to impose development standards addressing issues such as unit size, height, setbacks, lot coverage, parking, landscaping, and architectural review. The City updated (2021) Section 9.146.050 of its Municipal Code to be consistent with California Government Code Sections 65852.150 and 65852.2, which establish regulations for accessory dwelling units. The information contained in this section is valid at the time of the Housing Element's preparation (2021). Please refer directly to the Lake Forest Municipal Code for all current applicable regulations pertaining to ADUs.

Lake Forest Municipal Code (LFMC) Section 9.146.050 was amended to define an accessory dwelling unit as "an attached or a detached residential dwelling unit that provides complete independent living facilities for one (1) or more persons and is located on a lot with a proposed or existing primary residence." An ADU includes permanent provisions for living, sleeping, eating, cooking, and sanitation.

Construction of an ADU or JADU (junior accessory dwelling unit) is permitted in zones that allow residential uses and include a proposed or existing dwelling. ADUs and JADUs are subject to compliance with the requirements described in

Table 54 below and in LFMC Section 9.146.050. ADUs shall be permitted on any residential or mixed-use zone that allows residential units, subject to the following criteria, which include (but are not limited to):

- Sites developed or proposed to be developed with a single-family residence shall be permitted one ADU.
- Sites developed with a multifamily building may convert existing non-habitable square footage within the building to a minimum one ADU and a maximum that shall not exceed twenty-five percent of the number of units on the site. Sites developed with a multifamily building are also permitted to construct two ADUs or to convert detached accessory buildings, garages, carports, or covered parking structures to a maximum of two ADUs.
- A maximum of one JADU is allowed on sites developed or proposed to be developed with a single-family residence. A JADU must be contained entirely within an existing or proposed single-family structure.

The City's approval process for ADUs is consistent with State law. The ordinance sets forth the following development standards for ADUs, which are applicable as of September 2021:

TABLE 54: ADU AND JADU DEVELOPMENT STANDARDS

Specific Regulations	ADU		JADU	Additional Provisions
	Attached	Detached		
Maximum Size	Building permit only: 800 sq. ft. Building permit and ADU Permit: 850 sf (0-1 bedroom) 1,000 sf (2 bedroom)	Building permit only: 800 sq. ft. Building permit and ADU Permit: 850 sf (0-1 bedroom) 1,000 sf (2 bedroom)	500 sf	(1)
Maximum Height	16 ft (1 story) 35 ft (2 story)	16 ft (1 story)	Same as primary residence	
Minimum Front Yard Setback	Building permit only: none Building permit and ADU Permit: 25 ft	Building permit only: none Building permit and ADU Permit: 25 ft	--	(2)
Minimum Side/Rear Yard Setback	4 ft	4 ft	--	(2)
Minimum parking	1 space	1 space	--	(3)(4)(5)(6)
Tandem Parking	Permitted	Permitted	--	

Source: City of Lake Forest Zoning Code, 2021

1. An attached ADU that is created on a lot with an existing primary dwelling is further limited to fifty (50) percent of the floor area of the existing primary dwelling.
2. No setback is required for an ADU subject to this subsection (F) if the ADU is constructed in the same location and to the same dimensions as an existing structure.
3. No parking is required under the following situations: the ADU is located within one-half (½) mile walking distance of public transit; the ADU is located within an architecturally and historically significant historic district; the ADU is part of the proposed or existing primary residence or an accessory structure; when on-street parking permits are required but not offered to the occupant of the ADU; and/or, when there is an established car share vehicle stop located within one (1) block of the ADU.
4. When a garage, carport, or covered parking structure is demolished in conjunction with the construction of an ADU or converted to an ADU, those off-street parking spaces are not required to be replaced.
5. Each unclosed parking space shall be at least nine (9) feet wide and eighteen (18) feet long.
6. Each parking space that is provided in an enclosed garage shall be at least ten (10) feet wide and twenty (20) feet long and have at least seven and one half (7 ½) feet vertical clearance.

Manufactured Housing: State law requires that manufactured housing, when constructed as a single-family dwelling on a permanent foundation, be treated as a conventional single-family home subject to the same development standards applicable to a single-family residential dwelling on the same lot, except for architectural requirements limited to its roof overhang, roofing material, and siding material. In accordance with State law, manufactured housing in the City may be placed on lots that allow single-family residential uses provided that the homes are attached to a foundation system in compliance with all applicable building regulations and Section 18551 of the Health and Safety Code and occupied only as a residential use.

Mobile Home Park: Mobile home parks, including manufactured home parks, that conform to the State Mobile Home Parks Act (Division 13, Part 2.1 of the California Health and Safety Code, commencing with Section 18200) or the implementing State guidelines (Title 25, Division I, Chapter 2 of the California Code of Regulations) and Section 18300 of the Health and Safety Code, are allowed in the R2, R4, and RP residential zones but require a use permit. The City of Lake Forest currently has four mobile home parks.

Residential Care Facility: Residential care facilities refer to any family home, group home, or rehabilitation facility that provides 24-hour non-medical care to persons in need of personal services, protection, supervision, assistance, guidance, or training essential for daily living. The City of Lake Forest Zoning Code refers to residential care facilities

as “community care facilities.” “Small” community care facilities (those serving six or fewer clients) are permitted by right in all residential zones and in the A1 zone subject to the same development standards and permit processing requirements as other residential uses in those zones, pursuant to the California Lanterman Developmental Disabilities Services Act. “Large” community care facilities (those serving seven or more clients) are permitted with a use permit in the Commercial, Urban Activity, and Agriculture (A1) zones.

In 2017, residential care facilities were separated out of residential zones and transitory-lodging uses in residential districts were included in conformance with State law. Program 7 states that the Zoning Code shall be revised as necessary to ensure that transitional and supportive housing are allowed in residential and mixed-use zones subject to the same standards as a residence of the same type in the same zone consistent with Government Code Section 65583(c)(3).

Farm Worker Housing: Although the City of Lake Forest is not located within a major agricultural area, the City's Zoning Code includes two districts that allow agricultural uses (A1 and OS). Pursuant to the California Employee Housing Act and consistent with Health and Safety Code Section 17021.6, facilities with up to 36 beds in a group-quarters or 12 units or spaces to board farm workers are treated as accessory or incidental to agriculture operation and permitted in the same manner as agricultural uses. The City permits Agriculture Employee Quarters in the A-1 and OS zones by right.

As included in Program 7 of the Housing Plan, the Zoning Code will be updated to define “agricultural worker housing” and to stipulate that any *agricultural worker housing* providing no more than 36 beds in a group-quarters, or consisting of 12 or fewer units or spaces, shall be deemed an agricultural land use and permitted in the same manner as *agricultural uses* consistent with Health and Safety Code Section 17021.6. The Zoning Code will also be updated to provide for streamlined, ministerial approval of agricultural worker housing that meets the requirements of Health and Safety Code Section 17021.8.

As included in Program 7 of the Housing Plan, the Zoning Code will be updated to define “employee housing” distinctly from “agricultural worker housing” and to clarify that *employee housing* serving six or fewer employees shall be deemed a single-family structure and shall be subject to the same standards for a single-family residence in the same zone.

Emergency Shelter: Emergency shelters are allowed by-right (i.e., ministerial approval) in the Industrial (I) zone, subject to compliance with objective standards consistent with the requirements identified in Government Code Section 65583(a)(4).

No emergency shelters are currently located within Lake Forest. While all of the City's Industrial parcels are developed (consistent with all other areas of the City), there are vacancies within existing buildings, allowing for potential adaptive reuse of existing space. These parcels are infill sites in developed areas and are suitable for emergency shelters. Water, sewer, and utilities are available in the roadways adjacent to these parcels.

The I zone is suitable for emergency shelters because:

- Shelters are compatible with a range of uses that are common in suburban communities and allowed in the I zone (e.g., office buildings, religious institutions, child or day care, commercial or vocational schools, warehousing, libraries, civic or government uses, etc.);
- I zoned parcels are served by public bus routes that connect to regional transit with an average distance of 0.29 miles from each parcel to a bus stop;
- Existing uses in the I zone are primarily light industrial, warehousing, and office uses – no heavy industrial uses are present; and
- The parcels are not known to be constrained by the presence of hazardous materials either on or adjacent to the properties.

As included in Program 7 of the Housing Plan, the Zoning Code will be updated to require sufficient parking to accommodate all staff working in an emergency shelter, provided that the standards will not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a).

Low Barrier Navigation Center: A low barrier navigation center is a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. AB 2162 amended Government Code Section 65583 to require jurisdictions to streamline approval of eligible low barrier navigation center applications in areas zoned for mixed-use and residential zones permitting multifamily uses, subject to specific criteria. As included in Program 7 of the Housing Plan, the Zoning Code will be updated to define and permit low-barrier navigation centers consistent with the requirements of Government Code Sections 65660 through 65668, including treating low-barrier navigation centers as a by-right use in areas where multifamily or mixed uses are permitted

Transitional and Supportive Housing: Transitional housing is a type of housing used to facilitate the movement of homeless individuals and families to permanent housing. Transitional housing can take several forms, including group quarters with beds, single-family homes, and multifamily apartments and typically offers case management and support services to return people to independent living (usually between 6-24 months). The Zoning Code defines transitional housing as “buildings configured as rental housing developments but operated under [multifamily housing] program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six (6) months” This definition is consistent with Government Code Section 65582(j).

According to the National Housing Institute, supportive housing is permanent housing with a service component, which can be provided either on-site or off-site. The Zoning Code defines supportive housing as “housing with no limit on length of stay, that is occupied by the target [homeless] population, and that is linked to on-site or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.” The target population may include persons with disabilities, elderly, youth aging out of the foster system, veterans, and homeless. The City's definition is consistent with Government Code Section 65582(g).

Senate Bill 2 amended Government Code Sections 65582, 65583, and 65589.5 and provides that transitional housing and supportive housing that is a rental housing development constitutes a residential use. It requires zoning to treat such uses as a residential use and subject only to those restrictions that apply to other residential uses of the same type in the same zone. Included as Program 7 of the Housing Plan, the Zoning Code shall be revised to ensure that transitional and supportive housing is allowed in residential and mixed-use zones subject to the same standards as a residence of the same type in the same zone consistent with Government Code Section 65583(c)(3), and to allow eligible supportive housing as a by-right use in zones where multi-family and mixed uses are permitted pursuant to Government Code Sections 65650 through 65656.

Single-Room Occupancy (SRO): Single-room occupancy (SRO) facilities are a housing type that is considered suitable to meet the needs of extremely low, very low, and low-income households. With high housing costs, many communities in California are exploring the use of single-room occupancy housing to fulfill the affordable housing needs of certain segments of the community, such as seniors, students, and single workers. The Lake Forest Zoning Code defines an SRO unit as follows:

A building with a common entrance containing a cluster of at least five (5) rental units which provide sleeping and living facilities for one (1) or two (2) persons where kitchen and/or bathroom facilities may be shared. The units shall have a minimum of one hundred (100) net square feet of space for single occupancy and one hundred twenty (120) square feet for two-person occupancy. The calculation for floor space in the sleeping area includes built-in cabinets, sinks, and closets but excludes toilet compartments. A unit larger than two hundred twenty-five (225) square feet

shall be deemed an efficiency dwelling unit and not a Single-Room Occupancy (SRO).

SROs are permitted in the Commercial (C) and Urban Activity (UA) zones subject to a Site Development Permit, and in the Industrial (I) zones subject to a Use Permit. Standards for SROs are addressed in Zoning Code section 9.146.150. Requirements relate to the performance of the facility, such as parking, security, and management.

Housing for Disabled Persons: On January 1, 2002, SB 520, which amended Government Code Section 65589.5 and added sections 65913.5 and 65913.6 and Chapter 4.35 became effective and required local jurisdictions to analyze local government constraints on developing, maintaining, and improving housing for persons with disabilities. In accordance with SB 520 and Government Code 65583(a)(7), the City recognizes the importance of providing housing for persons with disabilities. Persons with disabilities have a number of specific housing needs, including those related to design and location. Design needs generally include the removal of architectural barriers that limit the accessibility of dwelling units, and construction of wheelchair ramps, railings, etc. Location needs include accessibility to public transportation, commercial services, health care, and supportive services. Some persons with disabilities need group housing opportunities, especially those who are lower-income or homeless. The following discussion addresses these issues and determines that no specific City policy or regulation serves to impede the access that persons with disabilities have to housing that suits their specific needs.

Zoning and Land Use: The General Plan and Zoning Code provide for the development of multifamily housing with four or fewer units in the R2/R4 zones by right, as well as in the RP zone by Use Permit. Multifamily housing with five or more units are permitted in the R2/R4 zones subject a Site Development Permit. Traditional multifamily housing for persons with special needs, such as apartments for the disabled, are considered regular residential uses permitted in these zones. The City's land use policies and zoning provisions do not constrain the development of such housing.

Under the Lanterman Developmental Disabilities Services Act (Lanterman Act), small State-licensed residential care facilities for six or fewer persons must be permitted in all zones that allow single or multifamily uses, subject to the same permit processing requirements and development standards. The City of Lake Forest Zoning Code treats small residential care homes as a single-family residential use permitted by right in residential zones, in compliance with the Lanterman Act. Large residential care facilities serving seven or more clients are allowed in the A1 zone. Occupancy standards for residential care facilities are the same as occupancy standards for all other residential uses. The Zoning Code also accommodates transitional and supportive housing in all residential districts subject only to the same requirements for residential uses of the same type (e.g., single-family or multifamily) in the same zone. These facilities may serve persons with disabilities.

Building Code: Building construction and procedures within Lake Forest are required to conform to the current California Building Code, as adopted in Title 8 of the City's Municipal Code. Standards within the Building Code include provisions to ensure accessibility for persons with disabilities. These standards are consistent with the Americans with Disabilities Act (ADA). No local amendments that would constrain accessibility or increase the cost of housing for persons with disabilities have been adopted and City officials are not aware of any instances in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

Reasonable Accommodation: Both the federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodation (i.e., modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that elevated ramping can be constructed to provide access to a dwelling unit for a resident who has mobility impairments. Whether a particular modification is reasonable depends on the circumstances and must be decided on a case-by-case basis.

Reasonable accommodation refers to flexibility in standards and policies to accommodate the needs of persons with disabilities. The City's zoning and building codes, as well as approach to code enforcement, allow for special provisions that meet the needs of persons with disabilities without the need for variances. The City's Reasonable Accommodation Ordinance is codified in Chapter 9.224 of the Zoning Code.

The City's Director of Community Development has administrative/ministerial authority to hear and decide applications for reasonable accommodation to allow reasonable remedy from zoning and other land use regulations, policies, and procedures for individuals with physical or mental impairment. A request for reasonable accommodation may include a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice.

Lake Forest Municipal Code Section 9.224 outlines the process for reasonable accommodation applications.

Conclusion: Current planning policies and zoning regulations have mitigated potential constraints to the availability of housing for persons with disabilities. The City has analyzed its Zoning Code and procedures to ensure that it is flexible, and not constraining the development of, housing for persons with disabilities.

Development Standards

Development standards directly shape the form and intensity of residential development by providing controls over land use, heights and volumes of buildings, open space on a site, etc. Site development standards also ensure a quality living environment for all household groups in the City, including special groups such as lower and moderate-income households and senior citizens.

Residential Parking Requirements

Parking standards are an important development regulation in communities. The City's parking requirements are intended to ensure that adequate off-street parking and loading facilities are provided in proportion to the need created by the type of use. Adequate parking for residential projects contributes to the value of a project, the safety of residents, and the quality of a project's appearance. However, excessive parking standards can pose a significant constraint to the development of housing because they can reduce the buildable area on a site and impact the funding available for project amenities or additional units. The parking requirements for residential and mixed-use developments, as applicable in September 2021, are shown in Table 55.

TABLE 55: RESIDENTIAL PARKING REQUIREMENTS

Use	Requirement			Additional Regulations
Single-Family Dwelling	<ul style="list-style-type: none"> 2 covered spaces 			Those dwellings having less than an eighteen (18) foot setback from the back of curb or sidewalk, whichever is closest to the garage or carport, shall provide one (1) additional parking space within two hundred (200) feet of the dwelling. On-street parking, where permitted, may be used for the additional space.
Multifamily (2+ units)*	<ul style="list-style-type: none"> 0 – 1 bdrm: 1.5 spaces per du 2 bdrm: 2 spaces per du 3+ bdrm: 2.5 spaces per du + 0.5 per bedroom in excess of 3 In addition to above, add 0.2 guest parking spaces per dwelling unit (rounded to the nearest whole number) 			<ul style="list-style-type: none"> For multifamily projects of 5+ units, requirement that off-street parking spaces be covered is not applicable
Multifamily (5+ units)*	Unit Size (square feet)	Assigned	Unassigned	<ul style="list-style-type: none"> For Multifamily projects with 5+ units, off-street parking requirements may be used in lieu of Multifamily (2+ units)
	700 or less:	1.0		
	701-800	1.0	+0.17	
	801-900	1.0	+0.34	

	901-1,000 1,001-1,100 1,101-1,200 1,201-1,300 1,301-1,400 1,401-1,500 Over 1,500	1.0 1.0 1.0 1.0 1.0 1.0 1.0	+0.50 +0.67 +0.84 +1.00 +1.18 +1.34 +1.5	above <ul style="list-style-type: none"> For multifamily projects of 5+ units, requirement that off-street parking spaces be covered is not applicable In addition to above, add 0.2 guest parking spaces per dwelling unit (rounded to the nearest whole number)
Accessory Dwelling Unit	<ul style="list-style-type: none"> 1 space per ADU No spaces required for JADU 			No parking is required if ADU is: <ul style="list-style-type: none"> Located within 0.5-mile walking distance of public transit Located within an architecturally and historically significant historic district Part of the proposed or existing primary residence or an accessory structure When on-street parking permits are required but not offered to the occupant of the ADU When there is a car share vehicle located within one block of the ADU
Congregate care facility serving more than 12 persons	1 space per unit			--
Affordable Housing Projects Using Density Bonus	<ul style="list-style-type: none"> 0 - 1 bdrm: 1 on-site parking space 2 - 3 bdrm: 2 on-site parking spaces 4+ bdrm: 2.5 on-site parking spaces 			--

Sources: City of Lake Forest Zoning Code, 2021.

Pursuant to State law, the City provides development incentives for projects that include affordable housing units and may waive or reduce the parking requirements for such projects. The Director of Community Development may approve a parking reduction of up to five (5) percent of the total parking requirement for the sole purpose of accommodating modifications to an existing development to meet current legal requirements or regulations for purposes of accessibility and safety. The Planning Commission may approve parking reductions of up to ten (10) percent, subject to certain provisions. Moreover, affordable housing developments that are eligible for a density bonus pursuant to Government Code Section 65915-65918 are eligible to use parking standards established by State Density Bonus law.

As included in Program 7 of the Housing Plan, the Zoning Code will be updated to require sufficient parking to accommodate all staff working in an emergency shelter, provided that the standards will not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with AB 139.

DEVELOPMENT PROCESSING PROCEDURES

The time and cost of permit processing and project review can be a constraint to housing development if significant development review is required. Project review and permit processing are necessary steps to ensure that residential construction complies with applicable codes, standards. The time required for project approval is often not so much a factor of the approval body (e.g., Director versus Planning Commission), but the complexity of the project and associated environmental review. However, small infill projects that can be approved administratively are generally less complex and take a shorter time to obtain appropriate approvals. Larger and more complex projects like mixed-use development or residential subdivision maps subject to the California Environmental Quality Act (CEQA), require a public hearing before the Planning Commission. Projects reviewed by the Planning Commission, including Site Development Permits, Tentative Parcel Maps, and Tentative Tract Maps, typically require between 3 to 12 months to process. Projects reviewed by the City Council, such as General Plan and Zoning Code amendments, typically require between 6 to 12 months to process.

The City has and continues to take proactive steps to facilitate efficient development process. As part of the General Plan Update, the City prepared a program environmental impact report (EIR) that future applicants may rely upon, resulting in significant time and financial savings. The City reviews all applications for development prior to issuance of building permits to ensure projects contribute in a positive manner to the community and improve quality of life. Residential development projects may be subject to approvals – ministerial or discretionary (either with or without a public hearing). For most property in Lake Forest, new residential development with fewer than five units is permitted by right, provided the project adheres to the development standards of the zone. Projects with five or more units require approval of a Site Development Permit by the Planning Commission. The discretionary process allows the project to be reviewed for appropriateness, scale, architecture, site design, and compatibility with the surrounding area. The City is currently (2021) preparing objective design standards consistent with the requirements of SB 35 Streamlined Permitting (Government Code Sections 65400 and 65582.1) requirements. This section outlines the timeline for typical residential development review and describes the permitting requirements and procedures for Site Development Permits, Use Permits, Subdivision Maps, etc. Based on the development activity during the 5th Cycle RHNA period, the City's processing and permitting procedures do not appear to unduly constrain the development of housing.

DISCRETIONARY PERMITS

A discretionary permit is a permit issued or approved by the City of Lake Forest as the result of an application the City retains the right to approve or disapprove. Section 9.184 of the Municipal Code specifies the City's Discretionary Permit process, including the procedures and requirements for discretionary permit applications and the basis or "findings" for decisions regarding such applications.

FEATURE PLANS

A feature plan is a plan which conceptually describes, graphically and/or in writing, a proposed development for an identified and relatively large area of real property. The purpose of a feature plan is to describe how significant natural and man-made features will be preserved or developed and how large-scale planning issues of special concern (e.g., traffic) will be addressed. All subsequently adopted discretionary permits (e.g., area plans) and subdivision maps shall be consistent with the feature plan.

Feature plans shall be processed initially to the City Council. The Planning Commission shall be the approving authority for feature plan amendments, except when the commission finds that an amendment application proposes a change in policy from the originally approved feature plan, such amendment application shall be acted upon by the City Council.

After the date of final determination and after compliance with the Municipal Code, the policies and concepts of an approved feature plan shall be applicable to the property included within the boundaries of the feature plan until such time as the feature plan is amended or the applicable zoning regulations are revised so that the feature plan is no longer valid. All grading, development and improvements shall be in substantial conformance with the currently approved feature plan.

AREA PLANS

An area plan is similar to a feature plan except that an area plan contains relatively more detailed information and addresses a relatively smaller area of real property. A feature plan may or may not be required prior to the approval of an area plan. An area plan for a planned community or specific plan may have less restrictive site development standards if allowed by the enabling ordinance. The Planning Commission is the approving authority for all area plan applications and amendments.

After the date of final determination and after compliance with the Municipal Code, an approved area plan shall be applicable to the development of all real property included within the boundaries of such area plan until such time as it is amended or rendered invalid by amendment of the zoning regulations or feature plan applicable to the property. All grading, development and improvements shall be in substantial conformance with the provisions of the currently approved area plan.

USE PERMITS

The purpose of a use permit is to provide for the public review of detailed final plans for a proposed use. Uses which require a use permit are regarded as having a relatively moderate to high potential for adverse impacts on the subject site or surrounding community due to the nature of magnitude of the use vis-à-vis the sensitivity of the subject site or surrounding community. Use permits shall require a public hearing. If the land use regulations of a planned community or a specific plan allow a use permit to modify the site development standards to be less restrictive than otherwise stated in the enabling ordinance, such a use permit shall always require a public hearing before the Planning Commission.

SITE DEVELOPMENT PERMIT

The purpose of a site development permit is to provide for the administrative (or discretionary review, if applicable) of detailed development plans for a proposed use. Uses which require a site development permit are regarded as having a relatively low potential for adverse impacts on the subject site or surrounding community due to the nature or magnitude of the use vis-à-vis the sensitivity of the subject site or surrounding community.

A site development permit shall be processed as an administrative action, unless the Director of Community Development determines on a case-by-case basis that the public interest would be better served by a public hearing before the Planning Commission. If the land use regulations of a planned community or a specific plan allow a site development permit or site plan to modify the site development standards to be less restrictive than otherwise stated in the enabling ordinance, such a site development permit shall always require a public hearing before the Planning Commission.

Establishment, maintenance, and operation of the use or uses proposed by the application shall be in compliance with the information and specifications shown on the approved site development permit.

FINDINGS

The following findings shall be made by the approving authority prior to the approval of any discretionary permit:

- General Plan. The use or project proposed is consistent with the General Plan.
- Zoning Code. The use, activity or improvement(s) proposed by the application is consistent with the provisions of the Zoning Code.
- CEQA. The approval of the permit application is in compliance with the requirements of the California Environmental Quality Act.
- Compatibility. The location, size, design and operating characteristics of the proposed use will not create significant noise, traffic or other conditions or situations that may be objectionable, detrimental or incompatible with other permitted uses in the vicinity.

- General Welfare. The application will not result in conditions or circumstances contrary to the public health and safety and the general welfare.
- Development Fees for Provision of Public Facilities. One (1) of the following findings shall be made:
 - The property to which the permit applies is not located in a fee area.
 - The permit would not allow development of a project which would contribute to the need for the facility for which a fee is required.
- The project has been reviewed in accordance with Citywide Design Guidelines and is consistent with the purpose and intent of the guidelines.

As previously stated, the City is currently (2021) preparing objective design standards for by-right residential development, which will change the project review process. Please refer to the City for more information regarding the most current requirements.

TYPICAL TIMEFRAMES

Table 56 outlines the typical processing times for single-family and multifamily projects with and without preparation of a robust environmental document.

TABLE 56: TYPICAL PERMIT PROCESSING TIMES AND REVIEWING BODY

Project Type	Processing Time without Negative Declaration/EIR	Processing Time with Negative Declaration/EIR
Single-Family Dwelling	3-6 weeks	N/A
Multifamily (Four or Fewer Units)	1-3 months	9-18 months
Multifamily (Five or More Units)	3-6 months	9-18 months

Source: City of Lake Forest, 2021

The length of time between the project approval and request for a building permit is minimal. Specifically, there is a 15 day appeal period following approval of a discretionary permit. In certain circumstances, a "hold harmless" letter may be filed and an applicant may submit their building plans with the understanding that fees may be lost if an appeal results in denial of the project's filed.

Discretionary permits subject to that require approval by the Director of Community Development is approximately typically require 4-6 weeks for processing. Discretionary permits subject to Planning Commission approval are processed in approximately 4-6 months.

Subdivisions

This review process applies to all residential land divisions within the City. Title 7 of the Lake Forest Municipal Code includes the standards and processes for subdivisions. It is based primarily on the State Subdivision Map Act. As it relates to residential development, the regulations apply to all land divisions that create lots for single-family homes and lots, or condominiums, for multifamily development. As part of the review process for subdivisions, the City reviews applications for compliance with lot size and shape standards, the general layout of the subdivision, and infrastructure requirements. If the project complies with the subdivision standards and General Plan density, the project can proceed through the approval process.

Reasonable Accommodation

The City's process for providing reasonable accommodation allows individuals, or their representatives, to make requests for reasonable accommodations for persons with disabilities. Requests for reasonable accommodation are approved administratively unless the request also requires a permit or entitlement requiring Planning Commission or City Council approval. City staff is available to provide assistance regarding the processing of requests for the construction of accessory structures intended to accommodate persons with disabilities.

The City amended its Zoning Ordinance in 2007 to establish the process for requesting and granting reasonable accommodations for persons with disabilities. Requests for reasonable accommodation are subject to review and

approval by the Director of Community Development. The Community Development Department provides assistance with applying for a reasonable accommodation to those who need it. The request must state the basis of the request, including the modification(s) or exception(s) to the regulations, standards or practices for the siting, development or use of housing or housing related facilities that would eliminate regulatory barriers and provide an individual with a disability equal opportunity to housing of his or her choice.

Lake Forest's reasonable accommodation procedure does not require a public hearing when the reasonable request is made on its own (if it was to be combined with entitlement, then a hearing would be required related to the entitlement request) and preserves privacy laws and fair housing laws. Only owners of abutting properties are notified of reasonable accommodation requests and approvals not subject to a public hearing. Lake Forest's reasonable accommodation procedure complies with Housing Element law and provides for disabled residents to make necessary changes to their properties.

The City's reasonable accommodation process requires the requestor to provide a letter specifying the request and an explanation of how the request will provide reasonable accommodation in the application of the City's zoning laws to afford a disabled person(s) an equal opportunity to use and enjoy a dwelling within the City. Depending on the nature of the request, plans may be required to clearly illustrate the request. The City does not charge a fee for a request for reasonable accommodation. Within 5 days of receipt of the letter and plans (if applicable) the City will notify the applicant if any additional information is necessary to complete the application.

A decision for a request for a reasonable accommodation will be determined by the Director of Community Development within 30 days of receipt of the application that was deemed complete. With the exception, that when the request is part of an entitlement requiring Planning Commission or City Council review, the request will be processed with the entitlement. A decision for a request for a reasonable accommodation must be approved if the request meets the following criteria:

1. The accommodation is reasonable, considering the nature of the applicant's disability, the surrounding land uses, and the rule, standard, policy or practice from which relief is sought;
2. The accommodation is necessary to afford the applicant equal opportunity to enjoy and use a dwelling;
3. The accommodation will have only incidental economic or monetary benefits to the applicant, and the primary purpose of the accommodation is not to assist with real estate speculation or excess profit-taking;
4. The accommodation does not create a substantial adverse impact on surrounding land uses, or a public nuisance, that cannot be reasonably mitigated;
5. The accommodation is reasonably feasible, considering the physical attributes of the property and structures;
6. There are no alternative accommodations which may provide an equivalent level of benefit to the applicant, while minimizing adverse impacts on surrounding land uses and lessening the financial and/or administrative burden on the City;
7. In the case of a determination involving a one (1) family dwelling, whether the household would be considered a single housekeeping unit if it were not using special services that are required because of the disabilities of the residents;
8. The requested accommodation does not impose an undue financial or administrative burden on the City; and
9. The requested accommodation does not require a fundamental alteration in the nature of a program. (Ord. 176 § 1, 2007)

The City has considered the criteria and does not consider these findings as a potential constraint on housing for people with disabilities. Should an applicant have a concern with meeting a specific criteria, the City will proactively work with the applicant to explore ways the criteria can be met successfully. To date, the City has not been made aware of any issues with meeting the criteria listed above.

ENVIRONMENTAL REVIEW

The City has adopted procedures for complying with the requirements of the California Environmental Quality Act (CEQA), including assessing the potential environmental impacts of development applications determined to be a “project” as defined by Public Resources Code 21000-21177. Environmental review is required for most discretionary actions including Use Permits, Subdivision Maps, and legislative actions including General Plan amendments, zone changes, and code amendments. Environmental review occurs while the application is being processed. An environmental determination by City staff for a project is made to prepare the appropriate environmental document for consideration by the decision-making authority.

Certain classes of residential projects may be categorically exempt from the provisions of CEQA or require only an Initial Study and Negative Declaration. The environmental review of categorically exempt projects requires a minimal amount of time and does not pose a significant constraint to housing development.

In 2020, the City adopted a comprehensive update to its General Plan and certified a Program Environmental Impact Report (EIR) which analyzed the potential impacts associated with implementation of the General Plan Land Use Map. Environmental documents for projects which are consistent with the densities and intensities analyzed under the General Plan Program EIR may tier off the analysis included in the General Plan EIR, which could significantly reduce the time and costs associated with preparation of required environmental documents. By proactively planning to accommodate new residential development throughout the City and analyzing the potential impacts of such development as part of the Program EIR, the City has helped to streamline the environmental review and approval process.

STREAMLINING APPROVALS

Lower Income Sites Included in Previous Elements

While the Development Review process is not considered a constraint to housing, Policy 1.8 has been included to comply with Government Code 65583.2. This program will allow by-right approval of housing developments proposed on non-vacant sites included in the previous housing element inventory and on vacant sites included in the two previous housing element inventories, provided that the proposed housing development includes at least 20 percent lower-income affordable housing units. This will increase certainty for affordable and multifamily developers related to residential sites throughout the community, as identified in Appendix A.

Senate Bill (SB) 35

SB 35 (Government Code Sections 65400 and 65582.1) provides provisions for streamlining projects based on a jurisdiction's progress towards its RHNA allocation and timely submittal of the Housing Element Annual Progress Report. Jurisdictions that have made insufficient progress toward their above moderate-income RHNA allocation and/or have not submitted the latest Housing Element Annual Progress Report are subject to the streamlined ministerial approval process for proposed developments with at least 10% affordability.

HCD reviews the annual progress report deadlines and RHNA progress on an annual basis. Lake Forest is currently subject to SB 35 streamlining provisions when proposed developments include at least 50% affordability. Program 7 in the Housing Plan has been provided to incorporate the mandatory streamlining provisions into the City's Zoning Code. These streamlining provisions will reduce approval requirements for projects that include a minimum of 50% of units affordable to lower income households and that meet the criteria specified by State law.

FLEXIBILITY IN DEVELOPMENT STANDARDS

Development standards affect the financials of a residential project, both from the revenue side (through achievable density) and through the costs of complying with specific development standards. However, there is no specific threshold that determines whether a particular standard or set of standards constrains the affordability or supply of housing. Many factors determine project feasibility. While prior sections discussed how to reduce development costs, the following describes ways that the Zoning Code offers flexibility in development standards.

Residential Density Bonus

The City Zoning Code allows density bonuses and other incentives for affordable and senior residential projects in accordance with State Density Bonus law. Section 9.152.010 of the Zoning Code incorporates by reference the procedures for providing density bonus or other incentives in compliance with state law (Government Code §65915 et seq.).

Condominium Conversions

In order to ensure a variety of housing opportunities (ownership and rental) including low-density single-family homes, moderate-density townhomes, higher-density condominiums and mobile homes, Chapter 9.172 of the City's Zoning Code provides the following requirements for proposed condominium conversions:

- A requirement for a condominium use permit approved by the City Council (if five or more units);
- Compliance with the applicable standards and requirements of the zoning district in which the project is located;
- The provision of a tenant purchase option;
- The payment of relocation expenses of \$1,500 in 2006 dollars adjusted annually in accordance with the Consumer Price Index;
- A requirement to submit an affordable housing implementation plan which incorporates a minimum of 15% affordable units (either rental or ownership); and
- A general prohibition on conversions (with specified overriding considerations) that becomes effective when the average rental vacancy rate within the City during the 12 preceding months is 4% or greater.

When a condominium conversion is permitted, the increase in the supply of less expensive for sale-units helps to compensate for the loss of rental units. One condominium conversion has been approved since adoption of amended condominium conversion standards in 2006. This demonstrates that the ordinance regulating condominium conversions is reasonable to preserve rental housing opportunities, and does not present an unreasonable constraint on the production of ownership housing.

Short-Term Rentals

Short-term rentals are defined in the Lake Forest Municipal Code under "Transitory-Lodging Use." Transitory-Lodging is prohibited in the City of Lake Forest. Nonetheless, there were 21 short-term rentals in Lake Forest listed on *Airbnb.com* in July 2021; however, only six of the rentals were for an entire apartment or condominium. The other 15 rentals were limited to a room or suite within a home and do not decrease the amount of housing stock available for permanent occupancy. A significant number of short-term rentals has the potential to affect the availability of housing stock. Therefore, this will be an issue that the City continues to monitor to ensure it does not negatively impact permanent housing options in the City.

BUILDING CODES AND ENFORCEMENT

New construction in Lake Forest, including additions and remodels, must comply with the current edition of the California Building Code (CBC). The City continues to adopt the most recent CBC with all required updates. The CBC establishes construction standards necessary to protect public health, safety, and welfare, and the local enforcement of this code does not unduly constrain development of housing. The 2019 California Building Code, Title 24, Part 2, Volumes 1 and 2, published by the International Code Council, was adopted by the City by reference as Title 8 of the City's Municipal Code and subject to the amendments contained in that title.

No local amendment to the CBC has been initiated or approved that directly impacts housing standards or processes. Code enforcement is conducted by City staff which is responsive to complaints from community members. The City maintains records of code complaints and works proactively in neighborhoods where violations are most prevalent to address potential issues before they become significant. The City enforces its code equitably and as necessary throughout the community. Program 16 in the Housing Plan helps support homeowners with rehabilitating substandard housing. The Code Enforcement and Building Divisions assist property owners with meeting State health and safety codes.

DEVELOPMENT FEES AND IMPROVEMENT REQUIREMENTS

State law limits fees charged for development permit processing to the reasonable cost of providing the service for which the fee is charged. Various fees and assessments are charged by the City and other public agencies to cover the costs of processing permit applications and providing services and facilities such as schools, parks, and infrastructure. Almost all these fees are assessed through a pro rata share system, based on the magnitude of the project's impact or the extent of the benefit that will be derived.

For new residential projects, developers in Lake Forest may be required to pay one or more of the following fees depending on the location, type, and size of the project:

Planning, Building, and Environmental Fees: In accordance with the adopted fee schedule, developers are charged standard fees for plan check, entitlement application processing, building permits, environmental impact studies, and other applications commensurate with the cost of processing such applications, conducting inspections, and performing other associated tasks.

Regional Agency Fees: Regional agency fees include water and sewer fees collected by the water district and sanitation district, and school impact fees collected by the school districts as allowed by State law to finance the construction and expansion of schools to accommodate student enrollment. The water, sanitation, and school districts have the authority to set their respective fees. The City does not have any ability to adjust these fees. Regional agency fees also include transportation agency fees, including the Foothill Circulation Phasing Plan, Foothill Eastern Transportation Corridor, Santiago Canyon Road, and El Toro Road program fees. Regional agency fees corresponding to a multifamily affordable housing project approved in 2021 ("Mountain View", 71 units) totaled approximately \$19,000 per unit. Some regional agency fees vary based on the product type (single-family or multifamily), but differences are relatively minor and the regional agency fee corresponding to the Mountain View project is representative of fees for both residential types.

Table 57 lists fees the City charges for new, standard residential development.

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TABLE 57: PLANNING AND DEVELOPMENT FEES (EFFECTIVE 08/16/2021)

Entitlements	
Planning and Application Fees	
Accessory Dwelling Unit (ADU) Permit	\$500 fee
Pre-Application Review	\$2,500 deposit
Tentative Parcel Map	\$7,500 deposit
Tentative Tract Map	\$10,000 deposit
Site Development Permit (administrative)	\$2,500 deposit
Site Development Permit (discretionary)	\$5,000 deposit
Site Development Permit (not except from CEQA)	\$10,000 deposit
Use Permit (minor)	\$2,500 deposit
Use Permit (major)	\$5,000 deposit
Use Permit (not except from CEQA)	\$10,000 deposit
Specific Plan	\$10,000 deposit
General Plan Amendment	\$10,000 deposit
Development Agreement	\$10,000 deposit
Zone Change	\$10,000 deposit
Area Plan	\$10,000 deposit
Feature Plan	\$10,000 deposit
Variance	\$5,000 deposit
Public Works	
Lot Line Adjustments	\$2,000 deposit
Grading Plan Check and Inspection	\$2,500 deposit
Water Quality Management Plan	\$1,000 deposit
Map Checking	\$3,500 deposit
Environmental	
Environmental Review (Initial Study, Neg. Dec., EIR, etc.)	Deposit TBD T&M* plus 15% admin fee
Peer-Reviewed Technical Studies	Deposit TBD T&M* plus 15% admin fee
Hourly Rate for Deposit Based Services	
Planning (In-House and Contract Service Planning)	\$143/hr
Public Works In-House Land Development Review	\$158/hr
Building and Safety	\$140/hr
City Clerk Dept. Billing Rate for Development Review	\$78/hr
City Manager Dept. Billing Rate for Development Review	\$101/hr
Community Services Development Review Services	\$176/hr
Finance Development Review Support	\$83/hr
IT / GIS Development Review Support	\$105/hr
Code Enforcement Divisional Billing Rate for Development Review Direct Services	\$78/hr
Police Dept. Billing Rate for Development Review	\$90/hr
Contract Service Support (e.g. Attorney, Contract Engineering, etc.)	T&M* plus 15% administrative

Source: City of Lake Forest, 2021

Note: This is only a partial list of typical Planning fees.

*Time and Materials

Table 58 identifies typical fees that would be collected per unit for hypothetical new single-family and multifamily development projects, based on the fees in effect in 2021 (see

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Table 57). Development fees in this example make up approximately less than 3% percent of a home purchase price. Because the City does not have development impact fees, Lake Forest fees are typically less than most surrounding communities.

TABLE 58: PROPORTION OF FEE IN OVERALL DEVELOPMENT COST FOR A TYPICAL RESIDENTIAL DEVELOPMENT (2021)

Development Cost for a Typical Unit	Single-Family (50 units)	Multifamily (140 units)
Typical City of Lake Forest estimated fees per unit	\$535	\$188
Typical regional agency fees estimated per unit	\$19,000	\$19,000
Total typical fees per unit	\$19,535	\$19,188

Source: City of Lake Forest, 2021

The City periodically evaluates the actual cost of processing development permits when revising its fee schedule. The last review and update occurred in 2021.

After the passage of Proposition 13 and its limitation on local governments' property tax revenues, cities and counties have faced increasing difficulty in providing public services and facilities to serve their residents. One of the main consequences of Proposition 13 has been the shift in funding of new infrastructure from general tax revenues to development impact fees and improvement requirements on land developers. The City requires developers to provide on-site and off-site improvements necessary to serve their projects. Such improvements may include water, sewer and other utility extensions, street construction and traffic control device installation that are reasonably related to the project. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities, and school sites, consistent with the Subdivision Map Act.

A typical local street requires a 60-foot right-of-way, with two 18-foot travel lanes. The City's road standards are typical for cities in Orange County and do not act as a constraint to housing development. Table 59 illustrates the City's road improvement standards.

TABLE 59: ROAD IMPROVEMENT STANDARDS

Roadway Designation	Number of Lanes	Right-of-Way Width	Curb-to-Curb Width
Principal Arterial	8	140'	120'
Major Arterial	6	120'	102'
Primary Arterial	4	100'	84'
Secondary Arterial	4	80'	64'
Local Street	2	60'	36'

Source: City of Lake Forest, 2021

The City's Capital Improvement Program (CIP) contains a schedule of public improvements including streets and other public works projects to facilitate the continued buildout of the City's General Plan. The CIP helps to ensure that construction of public improvements is coordinated with private development.

Although development fees and improvement requirements increase the cost of housing, cities have little choice in establishing such requirements due to the limitations on property taxes and other revenue sources needed to fund public improvements.

4B. Non-Governmental Constraints

Non-governmental constraints refer to market factors such as the demand for housing, the price of land, construction costs, availability of financing, and other factors that increase the cost of housing development.

DEVELOPMENT COSTS

Land Prices

The cost to develop housing is influenced by the cost of the raw land, the cost of holding the land during the development process, and the cost of providing services to meet City standards for development. The cost of raw land is influenced by variables such as scarcity, location, availability of public utilities, zoning, and unique features like trees and adjoining uses. In Orange County, undeveloped land is limited, and combined with a rapidly growing population, land prices have generally increased. A review of lots for sale and recently sold, using Zillow and LoopNet listings, found one vacant quarter-acre lot zoned for residential use in Lake Forest, zoned MDR and sold for \$530,000 or approximately \$53 per square foot (approximately \$2 million per acre).

A small number of underdeveloped parcels with a single-family unit that could be redeveloped with larger, single-family homes (with ADUs) or duplexes have been sold for \$735,000 to \$1,200,000 or approximately \$86 to \$267 per square foot, largely depending on the location within the community.

It is difficult to ascertain the cost of raw land for multifamily development since there has been a limited number of recent multifamily property sales in Lake Forest. A 4-unit property (fourplex) at 23061 Village Drive sold in August 2019 for \$1,425,000 or \$121 per square foot (\$356,250 per unit); a 2-unit property (duplex) at 23192 Saguaro Street sold in September 2019 for \$1,575,000 or \$193 per square foot (\$787,500 per unit); and a 5-unit property at 24512 Bendricon Lane sold in February 2020 for \$1,931,500 or \$200 per square foot (\$386,300 per unit)

Cost of Construction

Construction cost is determined primarily by the cost of labor and materials. The relative importance of each is a function of the complexity of the construction job and the desired quality of the finished product. As a result, builders are under constant pressure to complete a project for as low a price as possible while still providing a quality product. This pressure has led (and is still leading) to an emphasis on labor-saving materials and construction techniques.

The International Code Council (ICC) provides estimates for the average cost of labor and materials for typical Type VA protected, wood-frame housing. Estimates are based on "good-quality" construction, providing for materials and fixtures well above the minimum required by state and local building codes. In the 2018 edition of the Building Safety Journal, the ICC estimated that the average per square foot cost for good-quality housing was \$129-167 per square foot for Type I or II multifamily construction, \$113-147 per square foot for Type V (Wood Frame) multifamily construction, and \$122-141 per square foot for Type V (Wood Frame) one-and two-family dwelling construction. Although construction costs are a substantial portion of the overall development cost, they are consistent throughout the region and therefore are not considered a major constraint to housing production. The 2020 COVID-19 pandemic social distancing guidelines may increase constructions costs for an unknown period.

Construction cost increases, like land cost increases, affect the ability of consumers to pay for housing. Construction cost increases occur due to the cost of materials, labor, and higher government-imposed standards (e.g., energy conservation requirements). The development community is currently producing market rate for-sale housing that is affordable to moderate and above moderate-income households.

Cost and Availability of Financing

Financing is critical to the housing market. Developers require construction financing and buyers require permanent financing. The two principal ways in which financing can serve as a constraint to new residential development are the availability and cost of construction financing and the availability and cost of permanent financing.

- If financing is not easily available, more equity may be required for developing new projects. This results in fewer homebuyers who can purchase homes, since higher down payments are required.
- Higher construction period interest rates for developers result in higher development costs. For homebuyers, higher interest rates translate into higher mortgage payments (for the same loan amount). This in turn reduces the purchasing power of homebuyers.

On May 6, 2021, the reported average rate for a 30-year mortgage was 2.96% with 0.6 fees/points (Freddie Mac, 2021). From 2005 through 2021, average monthly mortgage rates have ranged from a high of 6.76% in July 2006 to today's record lows. For homebuyers, it is necessary to pay a higher down payment than in the recent past, and demonstrate credit worthiness and adequate incomes, so that loan applications meet standard underwriting criteria. While adherence to strict underwriting criteria was not required during the early and mid-2000s, the return to stricter standards is consistent with loan standards prior to 2001.

Approved and Built Densities

While the City's General Plan identifies minimum and maximum densities that can be developed in Lake Forest, individual developers may opt to build at the lower, mid-range, or higher end of allowed densities. Additionally, the City's Zoning Code does not prescribe minimum or maximum densities, but rather relies on other development standards (minimum lot size, maximum height, and setbacks) to shape the scale of development. Recent projects in Lake Forest that are built or are under construction are consistent with the densities anticipated by the City's General Plan, PC Development Plans, and Zoning Code and typically built within the maximum allowable density. The City has received feedback from the development community that the maximum density levels are realistic and achievable, and the City requires projects be built within the allowable density.

AFFORDABLE HOUSING DEVELOPMENT CONSTRAINTS

In addition to the constraints to market rate housing development discussed above, affordable housing projects face other constraints. While there is a range of sites available for potential affordable housing projects, as well as projects that focus on special needs populations, financial assistance for the development of affordable housing is limited and highly competitive.

Multiple funding sources are typically needed to construct an affordable housing project since substantial subsidies are required to make the units affordable to extremely low, very low, and low-income households. It is not unusual to see five or more funding sources assembled to make a project financially feasible. Each of these sources may have different requirements and application deadlines and some sources may require that the project has already successfully secured financing commitments. Since financing is critical and generally competitive, organizations and agencies that provide funding can often effectively dictate the type and size of projects. Thus, in some years senior housing may be favored by financing programs, while in other years family housing may be preferred. Target income levels can also vary from year to year.

This situation has worsened in recent years. Federal and state funding has decreased and limited amounts of housing funds are available. Tax credits, often a fundamental source of financing for affordable housing, are no longer selling on a one for one basis. In other words, once a project has received authorization to sell a specified amount of tax credits to equity investors, the investors are no longer purchasing the credits at face value but are purchasing them at a discount.

Nonetheless, the City has been successful in collaborating with other stakeholders for the development of affordable housing in Lake Forest. For example, the City recently entered into an affordable housing agreement with National Community Renaissance for a loan to assist with the development of the 71-unit Mountain View Affordable Housing

Community. The City approved entitlements for the community with four incentives, that included reductions in the City's development standards.

The City has collaborated through Development Agreements with several developers on affordable housing in new neighborhoods. The City has included Program 5: Facilitate Affordable and Special Needs Housing Construction, to continue this tradition and further enhance the development of affordable and special needs housing in the City. The following represent affordable housing in conjunction with the new housing developments in Lake Forest:

- Baker Ranch has an affordable housing apartment complex (The Arroyo at Baker Ranch).
- The Portola Center development (under construction in 2021), which will be located at the intersection of Glenn Ranch Road and Saddleback Ranch Road, will feature an affordable housing complex age-restricted for senior citizens.
- "The Meadows Senior Affordable Apartments" were approved by Planning Commission on August 19, 2021. The project includes two-story 65-unit apartment complex, including 64 senior affordable units (of which 7 will be permanent supportive housing) and one market-rate manager's unit and associated site improvements. The project site is located on an approximately 2.6-acre lot in the Nakase Planned Community located on the southeast corner of the intersection of Rancho Parkway and Bake Parkway.

REQUESTS TO DEVELOP AT LOWER DENSITIES

New State Housing Element law now requires the non-governmental constraints analysis to evaluate developer requests to build at densities below the density identified in the Housing Element sites inventory. The following table presents the developed densities in recent multi-family and mixed-use projects in the Lake Forest, compared to the maximum permitted densities under zoning:

TABLE 60: COMPARISON OF ZONED AND BUILT DENSITIES

<u>Project</u>	<u>Zoning</u>	<u>General Plan</u>	<u>Permitted Density</u>	<u>Built Density</u>	<u>Percent of Max</u>
<u>Sr. Housing – Meadows</u> (Approved but not constructed as of 12/21)	<u>Senior Affordable Housing (SAH) in the Nakase Planned Community</u>	<u>High Density Residential</u>	<u>25-43 du/ac</u>	<u>25 du/ac</u>	<u>58%</u>
<u>Mountain View Affordable Housing Community</u> (Approved but not constructed as of 12/21)	<u>Multifamily Dwellings (R2)</u>	<u>High Density Residential</u>	<u>25-43 du/ac</u>	<u>36 du/ac</u>	<u>84%</u>
<u>Portola Center Senior Housing Mixed Use</u> (Approved but not constructed as of 12/21)	<u>Mixed Use (MU) in the Portola Hills Planned Community</u>	<u>Mixed Use 43</u>	<u>Maximum 43 du/ac</u>	<u>29 du/ac</u>	<u>67%</u>
<u>Copper Leaf and Silver Oak at Iron Ridge</u>	<u>Multi-Family Dwellings (MF) in the Portola Hills Planned Community</u>	<u>Medium Density Residential</u>	<u>15-25 du/ac</u>	<u>18 du/ac</u>	<u>72%</u>
<u>Covera at Serrano Summit</u>	<u>Multifamily Dwellings (R2) with Planned Development overlay</u>	<u>Medium Density Residential</u>	<u>15-25 du/ac</u>	<u>19 du/ac</u>	<u>76%</u>
<u>Arieta at Serrano Summit</u>	<u>Multifamily Dwellings (R2) with Planned Development overlay</u>	<u>Medium Density Residential</u>	<u>15-25 du/ac</u>	<u>21 du/ac</u>	<u>84%</u>
<u>Brookland at Baker Ranch</u>	<u>Residential (R) in the</u>	<u>Medium</u>	<u>15-25 du/ac</u>	<u>13 du/ac</u>	<u>52%</u>

	Baker Ranch Planned Community	Density Residential			
The Rowe and The Courts at Baker Ranch (mix of multi-family and single-family)	Mixed Use (MU) in the Baker Ranch Planned Community	Mixed Use 43	Maximum 43 du/ac	17 du/ac	40%
The Rowe II and The Courts II at Baker Ranch (mix of multi-family and single-family)	Residential (R) in the Baker Ranch Planned Community	Medium Density Residential	15-25 du/ac	16 du/ac	64%
Arroyo Apartments at Baker Ranch	Mixed Use (MU) in the Baker Ranch Planned Community	Mixed Use 43	Maximum 43 du/ac	30 du/ac	70%
Avalon Apartments at Baker Ranch	Mixed Use (MU) in the Baker Ranch Planned Community	Mixed Use 43	Maximum 43 du/ac	30 du/ac	70%
El Paseo Condominiums	Residential (R) in the Foothill Ranch Planned Community	Medium Density Residential	15-25 du/ac	20 du/ac	80%

Source: City of Lake Forest, 2021

As illustrated by this table, the City has approved and the market supports projects at the middle to upper end of the density range. However, in order to ensure future development implements densities planned for in the Housing Element sites inventory, the City has relied on a capacity adjustment of 75% based on typical densities, consistent with default densities for lower income affordability. Combined with other adjustments, the City assumes a 50% capacity at mixed-use sites based on the maximum density allowed.

4C. Environmental Constraints

According to the City's 2040 General Plan Existing Conditions Report and General Plan Environmental Impact Report, there are multiple environmental hazards affecting residential development in the City. These hazards include geologic and seismic conditions, wildfire (which provide the greatest threat to the built environment), and human-induced hazards (including hazardous materials). The following hazards may impact development of residential units in Lake Forest. None of the sites identified in the land inventory (Appendix A) have environmental constraints that would preclude the assumed level of development.

GEOLOGIC AND SEISMIC HAZARDS

Similar to other southern California cities, the City of Lake Forest is located in an area of high seismic activity. Although no active or potentially active faults traverse the City, Lake Forest is located in close proximity of multiple faults: the Newport-Inglewood-Rose Canyon Fault; the Palos Verdes Fault; the Whittier-Elsinore Fault; the Chino Fault; the San Andreas Fault; and the San Jacinto Fault. Surface rupture in Lake Forest is unlikely since no faults have been identified within the City boundaries. However, the City is likely to experience ground shaking, the degree to which would be based on the fault from which the earthquake occurs, its distance from the City, and the magnitude. Impacts of an earthquake include potential liquefaction, which occurs when the strength and stiffness of a soil is reduced by intense ground shaking. Structures particularly susceptible to earthquake damage include tilt-up structures, unreinforced masonry buildings, older buildings, and mobile homes.

The City is located along the southwestern flank of the Santa Ana Mountains and contains areas with steep slopes, particularly in the Foothill Ranch and Portola Hills area. Portions of Lake Forest are located within state-designated liquefaction and landslide zones. After the 1971 San Fernando earthquake, building codes and design criteria were updated to address seismic occurrences. The Lake Forest General Plan Public Safety Element contains Goals,

Policies, and Actions that address geologic and seismic hazards within the City. Policies include requiring special site-specific studies in areas potentially subject to liquefaction and incorporating site specific seismic structural design as required by applicable building codes.

WILDFIRE

Parts of Lake Forest are located within areas identified by CAL FIRE as Very High Fire Hazard Severity Zones, including the Whiting Ranch Wilderness Area, the open space north of Portola Parkway between Portola Hills and Foothill Ranch, and a small portion extending south to Portola Parkway northwest of the Foothill Ranch community.⁴ These areas are within local responsibility areas and under the service area of Orange County Fire Authority (OCFA). The Lake Forest General Plan Public Safety Element contains Goals, Policies, and Actions that address wildfires and emergency preparedness in the city. These include regulatory standards such as ensuring residential building codes comply with California Building and Fire Codes, mutual aid agreements and coordination with OCFA and CAL FIRE, and emergency operations and preparedness plans. Although these standards may constrain development to an extent, they are necessary to ensure public safety.

HAZARDOUS MATERIALS RELEASE

The City of Lake Forest is susceptible to the danger of hazardous materials spills from highways, railways and industrial facilities that store, use, or dispose of hazardous materials. This danger is somewhat mitigated, however, by various State and Federal legislation regulating the use, storage, and transportation of hazardous materials and the strict enforcement of these regulations. Additionally, the San Onofre Nuclear Generating Station is approximately 25 miles south of Lake Forest. It was shut down in 2012 and permanently retired in 2013 after attempts to restart it failed. Although it is no longer operational, a large volume of nuclear waste is stored on site. Lake Forest is in the station's "ingestion pathway zone," that is, the area where radioactive material released from the plant could contaminate food or water and potentially be ingested.

4D. Infrastructure Constraints

Another factor adding to the cost of new construction is the provision of adequate infrastructure: major and local streets; curbs, gutters, and sidewalks; water and sewer lines; storm drains; and street lighting. All these improvements may be required to be built or installed in conjunction with new development. In most cases, these improvements are dedicated to the City, which is then responsible for their maintenance. The initial construction cost of these facilities is borne by developers, added to the cost of new housing units, and eventually passed on to the homebuyer or property owner. As noted in the Resources chapter of this Housing Element, public infrastructure and services are available for all the sites included in the sites inventory, including the capacity to accommodate Lake Forest's total share of the regional housing need (RHNA).

Senate Bill 1087 (enacted 2006) requires that water providers develop written policies that grant priority to proposed development that includes housing affordable to lower income households. The legislation also prohibits water providers from denying or conditioning the approval of development that includes housing affordable to lower income households unless specific written findings are made. Senate Bill 1087 also mandates priority sewage collection and treatment service to housing developments providing units affordable to lower income households. The City will provide a copy of the Housing Element to its water and sewer providers in compliance with Government Code Section 65589.7 and SB 1087. As well, the Community Development Department will continue to coordinate with the water and sewer providers to ensure priority service provision to affordable housing developments.

WATER CAPACITY

Water service in Lake Forest is provided by three separate, independent utility districts: Irvine Ranch Water District (IRWD), El Toro Water District (ETWD), and Trabuco Canyon Water District (TCWD). Most of the City (approximately 83%) receives its water from IRWD, one of the largest water districts in Orange County and a member agency of the Municipal Water District of Orange County (MWDOC), which is a wholesale importer and member agency of the

⁴ "Very High Fire Hazard Severity Zones in LRA," CAL FIRE (October 2011).

Metropolitan Water District (MWD). A small portion of the City, the Portola Hills community, is located within TCWD service area boundary, yet is provided water by IRWD. IRWD receives its water supplies through a combination of groundwater from the Orange County Groundwater Basin, recycled water, and imported water supplies through MWDOC. The ETWD provides service to residents in the southeast corner of the City and relies completely on imported treated water from MWDOC to meet potable water demands.

Both the IRWD 2020 Urban Water Management Plan and ETWD 2020 Draft Urban Water Management Plan state they will be able to serve 100 percent of projected demands for the City of Lake Forest in normal, single-dry and multiple-dry years. Because of this, the projected purchases from IRWD and ETWD are assumed to make up differences between demand and other projected (groundwater and recycled water) supplies. Collectively, water supplies are projected to be sufficient to meet demands in all year types through the planning horizon (20 years).^{5,3}

The City of Lake Forest General Plan Environmental Impact Report (EIR) analyzed potential impacts to water capacity as a result of implementation of the General Plan Land Use Plan. When the net impact to potable water demand generated as a result of implementation of the Land Use Plan is compared to the supply available to the two Districts, it can be seen that both Districts have ample water supply to account for buildout of the General Plan. The General Plan includes a range of policies designed to ensure an adequate water supply for development and to minimize the potential adverse effects of increased water use.

SEWER CAPACITY

As with the water system, the City's sewer services are divided up by three utility districts, IRWD, ETWD, and TCWD. Among the three agencies, there are approximately 215 miles of sewer main within the borders of Lake Forest. As of 2008, the IRWD MWRP had a plant capacity of 18 million gallons per day (mgd) but it was recently expanded to a capacity of 28 mgd. As of 2014, the ETWD LAWRP had a plant capacity of 7.5 mgd but only approximately 3.43 mgd was being conveyed to the LAWRP for treatment. As discussed above, the only section of Lake Forest which TCWD provides wastewater services for is a portion of the Portola Hills community. The amount of flow capacity available to the Portola Hills Community is limited by the total capacity that TCWD owns in SMWD's wastewater collection system and the Chiquita Water Reclamation Plant. The District owns 0.558 mgd of capacity in SMWD's wastewater collection system and Chiquita Water Reclamation Plant. 0.428 mgd is reserved specifically for TCWD's El Toro Road Zone. Of the 0.428 mgd reserved for the El Toro Road Zone, 0.158 mgd is reserved for its Portola Hills customers.

As Lake Forest continues to develop in the future, there will be an increased need for water and wastewater services, including a reliable source of recycled water. These needs have been addressed in the three utility districts' master plans in coordination with the City. It will require that the Districts continue to implement phased improvements to some pump stations, sewer mains, and the various wastewater treatment plants when triggered by growth.

Based on implementation of the General Plan Land Use Plan with which this sites inventory is consistent, the projected flows for each District are not expected to exceed the treatment capacity available for the Districts. This assumes that the majority of the flow generated in the IRWD service area is conveyed to the LAWRP for treatment. There may be local infrastructure impacts for each of the focus areas as identified in the General Plan. Sub-Area master plans or development impact studies may be required by IRWD and ETWD for each of the focus areas to determine infrastructure impacts.

While full buildout of the development in the General Plan would slightly increase the existing treatment demand at the Districts' treatment plants, the General Plan includes a range of policies designed to ensure an adequate wastewater treatment capacity for development. The Districts must also periodically review and update their Master Plans. As growth continues to occur within the Planning Area and prior to the approval of new development, the Districts will identify necessary system upgrades and capacity enhancements to meet growth in coordination with the City.

⁵ "2020 Urban Water Management Plan: Irvine Ranch Water District," *Irvine Ranch Water District* (June 2021).

STORM WATER DRAINAGE

The City of Lake Forest spans three watershed areas with five natural creeks. A flood control system has been constructed to direct runoff away from developed areas and prevent flooding from rain. The Orange County Flood Control District (OCFCD) is responsible for regional flood control and maintains several facilities within the City. The City works closely with OCFCD to determine needs for flood control improvements and to identify improvements needed to accommodate proposed development projects. With these existing facilities and review procedures in place, the City's flood control system is not expected to limit development during the planning period.

ELECTRIC, GAS, AND TELECOMMUNICATIONS

Southern California Edison (SCE) provides electrical service and Southern California Gas Company (SoCalGas) provides natural gas services to residences and businesses throughout the City of Lake Forest. SCE provides electricity service to 15 million people over an approximately 50,000 square mile area throughout southern California.⁶ SoCalGas provides natural gas service to approximately 21.6 million customers, spanning roughly 20,000 miles.⁷ Infrastructure to deliver electricity and natural gas throughout Lake Forest is currently in place. SCE and SoCalGas can generally can provide these services to newer development on request.

Telecommunications services in Lake Forest are provided by a variety of service providers including AT&T and Spectrum. Infrastructure to deliver telecommunications throughout Lake Forest is currently in place and can generally be provided to newer development upon request.

⁶ "About Us," *Southern California Edison*, <https://www.sce.com/about-us> (November 2021).

⁷ "Company Profile," *Southern California Gas Company*, <https://www.socalgas.com/about-us/company-profile> (November 2021).

5. Housing Resources

This section of the Housing Element describes resources available for housing development. Resources include land designated for housing development and financial resources to assist with the development of housing.

5A. Regional Housing Needs Allocation (RHNA)

The City of Lake Forest falls under the jurisdiction of the Southern California Association of Governments (SCAG). SCAG is responsible for developing a Regional Housing Needs Plan (RHNP) allocating the region's share of the statewide housing needs to lower-level councils of governments, which then allocate the needs to cities and counties in the region. The Regional Housing Need Assessment (RHNA) is a minimum projection of additional housing units needed to accommodate projected household growth of all income levels by the end of the Housing Element's statutory planning period.

This RHNA covers an 8-year planning period (2021 through 2029) and is divided into four income categories: very low, low, moderate, and above moderate. Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% Area Median Income (AMI)). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation; therefore, the City's very low income RHNA of 956 units can be split into 478 extremely low income and 478 very low-income units.

The largest component of Lake Forest's RHNA (36%) is for above-moderate income households, which is primarily addressed through the development of single-family homes (attached and detached). Multifamily projects like apartments and condominiums, especially smaller unit sizes, are affordable to lower income households. Housing for lower income households is not typically provided in the Orange County market without some level of subsidy or regulatory requirement, and thus the Housing Element will need to provide sites at sufficient densities, combined with programs to support affordability, to address the housing needs of lower income households.

TABLE 61: RHNA 2021-2029

Income Group	Total Housing Units Allocated	Percentage of Units
Extremely/Very Low	956	30%
Low	543	17%
Moderate	559	17%
Above Moderate	1,178	36%
Total	3,236	100%

Source: Southern California Association of Governments, 2021

5B. Progress Towards the RHNA

Since the RHNA uses June 30, 2021 as the baseline for growth projections for the 2021-2029 planning period, jurisdictions may count housing units that have been developed, are under construction, and/or have received their building permits after June 30, 2021¹⁰ toward their RHNA obligation. Since this date, ~~755-461~~ housing units have been developed, are under construction, or have received building permits in Lake Forest (Table 62). These figures are accurate as of August 31, 2021.

Jurisdictions may also count projects that are approved/entitled but not yet built or under construction. ~~755-976~~ units in multiple income categories have been approved/entitled and are expected to be developed within the planning period. These credits towards meeting the City's RHNA obligation are specified in Table 62, and the affordability of each unit type/project is described in the following sections. These figures are accurate as of August 31, 2021.

TABLE 62: CREDITS TOWARDS THE RHNA

Project	Extremely and Very Low income (0-50% AMI)	Low income (51-80% AMI)	Moderate income (81-120% AMI)	Above Moderate income (121%+ AMI)	Total
Units Constructed/Under Construction/Building Permits Issued since June 30, 2021					
Teresina	0	0	0	57 31	57 31
Serrano Summit	0	0	0	308 200	308 200
Portola Center	0	0	0	300 217	300 217
<u>Portola Center Second Units</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>0</u>	<u>3</u>
Accessory Dwelling Units	<u>12</u>	<u>12</u>	<u>13</u>	<u>13</u>	<u>40</u>
Subtotal	<u>13</u>	<u>13</u>	<u>14</u>	<u>752</u> 451	<u>755</u> 461
Approved/Entitled Units Not Yet Under Construction					
<u>Teresina</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>26</u>	<u>26</u>
<u>Serrano Summit</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>65</u>	<u>65</u>
<u>Portola Center</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>140</u>	<u>140</u>
<u>Portola Center Second Units</u>	<u>53</u>	<u>84</u>	<u>53</u>	<u>00</u>	<u>1810</u>
<u>Portola Senior Housing Project</u>	<u>25</u>	<u>32</u>	<u>0</u>	<u>1</u>	<u>58</u>
The Meadows (Nakase)	7	57	0	542	606
Mountain View	70	0	0	1	71
Portola Senior Housing Project	25	32	0	1	58
Portola Center Second Units	53	84	53	00	1810
Subtotal	<u>107</u> 105	<u>97</u> 93	<u>53</u>	<u>544</u> 775	<u>753</u> 976
Total	108	98 96	67	<u>1,296</u> 1,226	<u>1,508</u> 1,437

Source: City of Lake Forest, August 31, 2021.

Note: Units identified as affordable to extremely and very low- and low-income households will be deed restricted.

AFFORDABILITY OF UNITS CREDITED TOWARDS THE RHNA

Units credited towards the RHNA are distributed among the four affordability categories (extremely/very low, low, moderate, and above moderate) based on affordability restrictions (as is the case with affordable housing projects including the Meadows, Mountain View, and Portola Senior Housing Project) or housing cost for those specific types of units (the case for all other units, excluding accessory dwelling units and second units); ~~based on real home rental/sale rates and established affordability levels. For example, t~~The market rate rents and sales prices for both single-family attached and single-family detached homes in Lake Forest are typically affordable to households earning above moderate incomes (120%+ AMI), and are allocated as such, as discussed in the Housing Affordability by Income Level discussion above (this applies to Teresina, Serrano Summit, Portola Center, and the Meadows). The City has approved several (10) ADUs since July 1, 2021 and has an additional three in units in the pipeline (discussed separately); based on information collected as part of the ADU application process and industry standards including SCAG's ADU affordability methodology (discussed later), the City has assumed one two of the permitted constructed/under construction ADUs is are affordable to extremely low/very low income, one two is are affordable to low income, one three is are affordable to moderate income, and one is three are affordable to above moderate income.

According to data collected from Zillow.com and Craigslist.com in January 2021, the average rents reported for Lake Forest were \$1,816 for studio units, \$1,841 for 1-bedroom units, \$2,225 for 2-bedroom units, \$3,193 for three-bedroom units, and \$4,933 for four or more bedroom units. Based on this data and the housing affordability thresholds shown in the Needs Assessment, low income (51-80% AMI) households (affordable monthly rent is at least \$1,883) can afford a studio or 1-bedroom unit, while 2-bedroom units are generally affordable to moderate

income (81-120%) households (affordable monthly rent is at least \$2,241). Larger (3+ bedrooms) units are sometimes affordable to larger (4+ person) households but are generally affordable to above moderate income (120%+ AMI) households.

Actual unit affordability will vary greatly based on unit size, household size and other factors. Given the distribution of affordability by income level based on unit and family size as described above, the City has assumed that new multifamily housing generally develops at densities of at least 30 du/ac and will result in the availability of units at very low, low, and moderate incomes; and new single-family attached or detached units will be suitable for moderate and above moderate income households.

Condominium units are considered entry-level homes and based on pricing are designated as affordable to moderate-income households. According to Zillow.com, in January 2021, the median price for condominiums sold in the City was \$485,000, which is affordable to a four-person moderate-income household (for which the maximum affordable purchase price is \$493,708).

UNITS CONSTRUCTED OR UNDER CONSTRUCTION

According to City building permit records, as of June 30, 2021, ~~755-461~~ new units have been constructed, are under construction, or have building permits pulled in Lake Forest, of which ~~13 (an two ADUs and one second unit in Portola Center)~~ has have been determined to be affordable to extremely low/very low income households, ~~13 (an two ADUs and one second units in Portola Center)~~ has have been determined to be affordable to low income households, ~~14 (an three ADUs and one second unit in Portola Center)~~ has have been determined to be affordable to moderate income households, and the remaining ~~760-451~~ units are affordable to above-moderate income households. Completed/under construction/building permits issued units include the following projects:

Teresina (formerly “Pinnacle at Serrano Highlands”)

Teresina is a single-family detached residential subdivision of approximately 24.6 acres with residences ranging from 3,238-4,329 square feet, including 4-5 bedrooms, and priced from \$1,305,000. Teresina includes 85- detached single-family residential units. As of ~~June 30~~ August 31, 2021, ~~57-31~~ of the units have have been constructed or are under not completed construction since the planning baseline date of June 30, 2021; units constructed prior to this date are not counted as a credit towards the City's 6th Cycle RHNA. These homes are affordable to above moderate-income households.

Serrano Summit

Serrano Summit is a residential community composed of detached single-family residential and attached condominiums located adjacent to the City's Civic Center. Serrano Summit includes 537 residential units, a portion of which have already been developed. As of ~~June 30~~ August 31, 2021, ~~308-200~~ of the units have been constructed or are under construction since the planning baseline date of June 30, 2021; units constructed prior to this date are not counted as a credit towards the City's 6th Cycle RHNA have not been completed construction. These units range in price from \$700,000 to \$1,200,000 and are affordable to above moderate-income households.

Portola Center (including Second Units)

Portola Center totals nearly 196 acres and includes single-family and multi-family residential units and commercial retail space, as well as other public and private recreational amenities. At completion, the 195-acre Portola Center site will include:

- 860 residences, including, single-family residences, multi-family residential units and affordable senior housing above commercial space.
- 10,000 square feet of commercial space.
- A 5-acre public park with playgrounds, picnic areas, and sports fields.
- New trails with exercise stations.
- Three private neighborhood parks totaling more than ten acres, including one with a rec center and pool.
- 44-plus acres of open space, including a 1.5-mile Perimeter Trail available to the public and adjacent private perimeter park with trail connections to Whiting Ranch Regional Park.

A portion of Portola Center has been developed. As of ~~June 30~~ August 31, 2021, ~~386~~ 217 of the units have been constructed or are under construction since the planning baseline date of June 30, 2021; units constructed prior to this date are not counted as a credit towards the City's 6th Cycle RHNA ~~have not completed construction~~. These are all assumed to be affordable to above moderate-income households. An additional 58 units (the affordable senior housing project) are approved/entitled but not yet (2021) under construction and are addressed in the following section. It should be noted that the Portola Center project also requires the development of 18 second units, three of which have been constructed or are under construction, as of August 31, 2021 (but after the baseline date of June 30, 2021). The affordability level of these ADUs is assumed to be consistent with the findings of SCAG's ADU affordability study and the findings for Orange County.

UNITS APPROVED/ENTITLED

Based on City records, ~~753~~ 976 units have been approved in Lake Forest that are not currently (2021) under construction but are expected to be completed during the planning period. Of these ~~753~~ 976 units, 102 will be deed-restricted affordable to extremely low/ very low-income households, 89 will be deed-restricted to low-income households, and ~~544~~ 774 are affordable to above-moderate income households. An additional ~~18~~ 10 second units will be provided in Portola Center, and the expected affordability of these second units is based on SCAG's ADU affordability methodology for Orange County. Projects that are approved but not yet constructed include the following:

Teresina (formerly "Pinnacle at Serrano Highlands")

As discussed in the prior section, Teresina will include 85 homes; as of August 31, 2021, 26 of these units are approved/entitled, but not yet under construction. All of these units are expected to be affordable to above moderate income households.

Serrano Summit

As discussed in the prior section, Serrano Summit will include 537 homes; as of August 31, 2021, 65 of these units are approved/entitled, but not yet under construction. All of these units are expected to be affordable to above moderate income households.

Portola Center (including Second Units)

As discussed in the prior section, Portola Center will include 860 homes; as of August 31, 2021, 140 of these primary units (excluding the Senior Housing Project, which is discussed separately) are approved/entitled, but not yet under construction. An additional 10 second units are also approved/entitled, but not yet under construction. All of the 140 primary units are expected to be affordable to above moderate income households; three of the second units are expected to be affordable to extremely very low/low income households, four are expected to be affordable to low income households, and three are expected to be affordable to moderate income households.

Portola Senior Housing Project

As previously described, the 195-acre Portola Center site will include a 58-unit affordable senior housing project. This project will accommodate extremely low/very low and low-income households and, based on discussions with the developer, the City has assumed that 25 of the units will be affordable to extremely low/very low-income households, 32 will be affordable to low-income households, and 1 (the manager's unit) will be affordable to above moderate-income households.

The Meadows (formerly "Nakase")

The Meadows is a 126-acre subdivision located southeast of the Bake Parkway/Rancho Parkway intersection. The property was previously a plant nursery. The project includes 541 single-family residential units in five neighborhoods, a 65-unit senior affordable housing, and a potential elementary school site. The project includes over 20 acres of parks, open space, and habitat restoration area.

The City is currently finalizing an Affordable Housing Implementation Plan (AHIP) for the Meadows project. The project will include at least 64 deed-restricted affordable units, including 7 permanent supportive housing units (assumed to be affordable to extremely low/very low-income households) and 57 units affordable to low-income households. The remaining units (542) are expected to be affordable to above moderate-income households.

Mountain View

The Mountain View affordable housing project is an approved 71-unit apartment complex to be built at 24551 Raymond Way, near the northeast corner of El Toro Road and Raymond Way. The project will be developed by National Core Renaissance, an affordable housing developer. The project will provide housing for very-low income and extremely low-income households. The project includes the demolition of an existing office building located at the site. Funding for the project requires that all units (except the manager's unit) be affordable to extremely very low/very low-income households. Of the 71 units, 70 will be deed-restricted affordable units for extremely very low/very low-income households and 1 unit (the manager's unit) will be affordable to above moderate- income households.

REMAINING RHNA

As of September 2021, the City has already achieved approximately half of its overall RHNA obligation with housing units constructed, under construction, or approved/entitled (~~1,508~~1,437 units). With these units taken into account, the City has met its allocation of above moderate-income units and has a remaining RHNA of 1,8467 units (~~653~~848 extremely low/ very low-income units, ~~453~~447 low-income units, and ~~558~~552 moderate income units).

TABLE 63: REMAINING 6TH CYCLE RHNA

Status	Extremely Low/Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	956	543	559	1,178	3,236
Completed, Under Construction/Permits Issued (Since 6/30/2021, <u>accurate as of 8/31/2021</u>)	31	13	14	752 <u>451</u>	755 <u>461</u>
Units Approved/Entitled	105 <u>107</u>	97 <u>93</u>	53	544 <u>775</u>	753 <u>976</u>
Remaining Allocation	848	445 <u>447</u>	553 <u>552</u>	0 (with a surplus of 118 <u>48</u> units)	1,84 <u>67</u> *

Source: City of Lake Forest, August 31, 2021, SCAG, 2021

* The total remaining allocation is the remaining allocation of extremely low/very low, low, and moderate income units (848, ~~445~~447, and ~~552~~553, respectively). This results in a remaining allocation of 1,8467 units. The surplus of above moderate-income units (~~118~~48) cannot be deducted from the remaining allocation, which is based on the remaining allocation by income level.

5C. Residential Sites Inventory

Housing element law requires an inventory of land suitable for residential development (Government Code Section 65583(a)(3)). An important purpose of this inventory is to determine whether a jurisdiction has sufficient land allocated for the development of housing to meet the jurisdiction's share of the regional housing need, including housing to accommodate households of all income levels. This section provides an analysis of the land available within the City for residential development. In addition to assessing the quantity of land available to accommodate the City's total housing needs, this section also considers the availability of sites to accommodate a variety of housing types suitable for households with a range of income levels and housing needs.

This Housing Element identifies underutilized sites that can accommodate residential uses (including 100% residential projects) within Lake Forest. It is noted that Lake Forest is essentially built-out with no remaining vacant land designed for residential development. As part of the City's recent comprehensive General Plan update (adopted in 2020), the City proactively planned for growth and identified key areas of the community (referred to as "focus areas") where mixed-use development is desirable. Moreover, the land use designations created and applied to these mixed-use areas allow for development of at least 30 du/ac, further supporting the City's goal of increasing its housing stock affordable to all income categories. This development density is uncommon in Lake Forest. It is the City's intent to promote the production of new housing units for all income levels, including for moderate-income households which have traditionally found it difficult to afford homeownership in Lake Forest.

A Citywide parcel database, aerial photos, and General Plan Geographic Information System (GIS) data were used to identify parcels for this update. In addition, numerous field visits were conducted and outreach with property owners was completed as part of the General Plan Update. Parcel acreages by land use designation referenced herein are based on Orange County Tax Assessor and GIS data.

MIXED-USE SITES

The City adopted a comprehensive update to its General Plan in June 2020. As part of this effort, the City engaged the community in a robust discussion regarding the potential for mixed-use development of key opportunities sites throughout the City. The intent of this process was to strategically identify areas of the City most likely to redevelop over time and to provide appropriate intensity and density standards to facilitate successful redevelopment. As a result, the City's land use plan includes new mixed-use land use designations applied to property along the City's major transportation corridors and around its activity centers. The mixed-use designations accommodate dynamic, vibrant, mixed-use and residential development close to jobs, goods and services. These new mixed-use designated sites are fundamental to the City's commitment to accommodate new residential development for all income levels. Through the General Plan update process, over 380 acres of land was designated for mixed use development at densities up to 32 du/ac or up to 43 du/ac (depending on the location) and an additional 95 acres was designated for mixed-use development at a density of up to 25 du/ac. In summary, the General Plan identified a capacity for at least 10,500 housing units in areas allowing for at least 30 du/ac (in areas designated for MU-32, MU-43, or UI-43), and another 792 units in mixed-use areas allowing for up to 25 du/ac (in areas designated for UI-25).

To harness the energy of the General Plan update and implement the new land use plan, the City immediately initiated an update to its Zoning Code to create new mixed-use zoning districts. The City conducted community surveys and other outreach and engaged a consultant team to create new zoning districts, regulations and development standards for City Council review and adoption by early 2022.

Goal LU-5 (in the City's Land Use Element) addresses focus areas for economic stability and growth, and envisions Lake Forest as "a community featuring mixed-use activity centers located along the City's major roadways and transportation facilities which allow for the co-location and harmonious development of housing, shopping, jobs, and public uses." The Land Use Element includes policies that promote the revitalization of these key focus areas. Additionally, the Land Use Element includes policies promoting densities and intensities sufficiently high to encourage redevelopment of underutilized sites, and an expanded range of housing types and densities to meet the diverse demographic, economic, and social needs of the community. In this context, all sites identified for mixed-use development in the City's General Plan are suitable for redevelopment, but only those sites best suited for redevelopment during the planning period have been identified and included in the City's sites inventory. In identifying those sites most suitable for redevelopment, the City considered the following factors:

- Site size and ownership patterns
- Developer interest in the property
- Redevelopment plans shared by the property owner
- Existing/past uses on the site
- Improvement to land value ratio
- Impacts of the COVID-19 pandemic on commercial real estate
- Site utilization/lot coverage/FAR
- Access to infrastructure, goods, services, and transportation facilities
- Site access and configuration
- Whether the site has similar characteristics to recent redevelopment projects in the region

Based on the factors listed, the City identified 78 parcels totaling approximately 162 acres as the most suitable and likely for redevelopment during the planning period, 60 of which (totaling 127 acres) are designated for development allowing at least 30 du/ac and identified to meet a portion of the City's lower-income RHNA allocation. Although each of these sites are developed with office, industrial, and/or retail uses, the sites typically are underutilized and are suitable for infill development or redevelopment (potentially without needing to demolish existing improvements), have structures at or near the end of their useful life, and/or existing intensity of development substantially lower than allowed by the City's 2040 General Plan. Furthermore, the current COVID-19 pandemic has seriously impacted the viability of many retail, service, and restaurant businesses. In recent years, many non-residential sites in the region have been redeveloped with mixed-use or residential-only projects. Appendix A identifies the sites included in the City's inventory along with existing land use information.

~~To date (September 2021), no projects have been developed on sites designated (2020) for mixed-use in the 2040 General Plan. In order to determine a conservative development estimate for the mixed-use designated areas, the City assumed that these sites will only develop at 50% of their development potential. This conservative estimate considers the following capacity factors, as identified in housing element statute (Gov. Code section 65583.2(c)(2)): land use controls, site improvements, realistic capacity of the site, and typical densities. Of the five factors only land use controls and site improvements, realistic capacity of the site, and typical densities are relevant when considering the capacity of sites in Lake Forest. Infrastructure constraints and environmental constraints are not applicable. Despite the fact that the City has the General Plan land use designations in place to accommodate its RHNA and is nearly complete with the associated update to its Zoning Code, the City does not yet have the zoning in place to accommodate its RHNA and therefore has been found to have a shortfall of sites. The City must complete its rezoning effort to accommodate its RHNA, including its lower income RHNA requirements. The City has included Program 1 to specifically commit to acreage, allowable densities, and anticipated units to accommodate its RHNA for all income levels. In addition, to accommodate the housing needs of lower-income households, the program specifically commits to rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i).~~

HOUSING AFFORDABLE TO LOWER-INCOME HOUSEHOLDS

The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by State law (at least 30 units per acre for Lake Forest), HCD is obligated to accept sites with those density standards (30 units per acre or higher) as appropriate for accommodating the jurisdictions share of regional housing need for lower-income households. Per Government Code Section 65583.2(c)(3)(B), the City's Mixed Use 32, Mixed Use 43, and Urban Industrial 43 designations are consistent with the default density standard (30 units per acre) for metropolitan jurisdictions such as Lake Forest and therefore considered appropriate to accommodate housing for lower-income households. Therefore, based on State law, sites that allow development densities of at least 30 units per acre are credited toward fulfilling a portion of the City's lower-income RHNA allocation. It should be noted that, the City has also assumed that a percentage of the units at these sites will be affordable to moderate income households.

SUITABILITY OF NONVACANT SITES

Because nonvacant sites comprise more than half of Lake Forest's sites inventory, Government Code Section 65583.2(g)(2) requires that the City analyze the extent to which existing uses may constitute an impediment to additional residential development, past experience in converting existing uses to higher density residential development, market trends and conditions, and regulatory or other incentives to encourage redevelopment. Furthermore, the City will make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue during the planning period.

City of Lake Forest is essentially entirely built out. There is no vacant unentitled land remaining to accommodate new multifamily residential development. In order to accommodate its fair share of regional housing growth, the City must identify nonvacant sites to accommodate its remaining RHNA for all income levels (not only its lower income requirements).

Increase in Development Potential in Mixed-Use Focus Areas

In 2018, Lake Forest began a 2-year process to comprehensively update the City's General Plan. As part of the Update, the City evaluated the General Plan Land Use Map to determine if the land uses and development patterns reflected the community's vision for the future of Lake Forest. An extensive outreach effort was initiated that included three community workshops, pop-up events and an on-line survey, which allowed the City to collect input from businesses and residents in the community to identify the locations within the City where land use changes could be supported by the city, local market conditions and economic factors.

The General Plan Update process included the development of an Existing Conditions Report, published in October of 2018. The report identified development patterns, socioeconomic conditions, and natural resources. It included important information of city demographics, housing supply, the size and composition of the local economy, commercial real estate market trends, as well as office, hospitality, and retail trends. Key socio-economic, market and fiscal trends for the City of Lake Forest were analyzed and compared to its regional neighbors-or trade area- in order to better understand the key issues and challenges facing Lake Forest in the future and to ensure that future land use changes would be feasible and implementable.

A General Plan Advisory Committee (GPAC) was formed that included members representing the real estate sector, commercial center owners, business owners, industrial uses, educational community, law enforcement, homeowners, tenants. The potential land use changes were discussed by the GPAC over the course of one year and their recommendations were presented to the City Council for consideration.

Five Focus Areas were identified, including the El Toro Road Corridor, Lake Forest Corridor, the Light Industrial Area, the Civic Center Area and the Foothill Towne Center. Ultimately, new mixed use land designations, allowing development at densities up to 43 du/ac, were adopted as part of the General Plan Update. In building the sites inventory for the 6th Cycle Housing Element, the most viable sites within the Focus Areas were selected for inclusion in the inventory. The RHNA for the lower income households was included in 4 of the Focus Areas. (The Civic Center area ~~doesid~~ not ~~containallow~~ sufficient density to support lower income households).

Property Owner Outreach

Staff met with property owners and property managers in the El Toro and Lake Forest Corridors, the Light Industrial Area and the Foothill Towne Center during the preparation of the General Plan Update. The landowners were supportive of the inclusion of high-density residential land uses in the areas. Since adoption of the General Plan in June of 2020, staff has met with 2 property owners who own sites included in the 6th Cycle inventory. Both landowners have prepared preliminary plans for the development of residential and mixed use on their sites. In one case, the owner would demolish all structures of the site and in another, the owner would modernize an existing office building, demolish several older non-competitive retail properties, and add residential land use at a density of 43 du/acre. In addition, a third property owner in the El Toro Focus Area has approved plans for the demolition of an existing office building and the construction of an affordable housing project. Lastly, during the 5th Cycle of the Housing Element, 2 existing auto dealerships in the Foothill Towne Center were demolished and replaced with medium density residential uses. Therefore, it has been ~~have~~ demonstrated that existing uses on properties do not impede the development of new residential projects and that existing uses are likely to be discontinued during the planning period.

Assessment of Sites (Appendix A)

The City has completed a detailed assessment of the suitability of all nonvacant sites identified to accommodate its RHNA. Included in Appendix A, the City has described the existing uses located at each site, any known constraints to development, any contact with property owners and tenants, and any other relevant information which supports the City's finding that all sites identified in its inventory are suitable for redevelopment during the planning period at densities and intensities consistent with the realistic capacity assumptions identified for the site, by income level. In particular, the City has identified six key trends prevalent in the redevelopment of occupied sites in Lake Forest and south Orange County, more generally. As described in Appendix A, all sites identified in the City's inventory exhibit at least two of these trends. The list of sites identified in the inventory has been reviewed by an economic consultant experienced working with the City and there are no known constraints that would preclude development of residential

uses during the planning period. Moreover, given the significant increase in commercial real estate development potential created through the redesignation of these sites to mixed-use (through the General Plan and ongoing Zoning Code Update), commercial real estate professionals working in and around Lake Forest fully expect to see properties turn-over for redevelopment at levels not previously seen, given the newness of these opportunities. While the City of Lake Forest has only recently adopted a new Land Use Map with new land use designations to allow for the redevelopment of underutilized sites, many of its neighbors (Laguna Hills, Mission Viejo, Irvine) initiated similar efforts in the preceding years and have seen success in redeveloping sites such as Laguna Hills Mall.

Development Trends

In addition to the site characteristics described above for mixed-use sites, the City has specifically considered six trends present in the region that have been identified as factors contributing to the likelihood of a site's redevelopment. These factors, which are described below, are identified by their application to each site anticipated to accommodate a portion of the City's lower-income RHNA in Appendix A. The factors include:

1. Oversupply of Retail
2. Discontinuation of Office Uses
3. Known Vacancies/Buildings for Rent or Sale
4. Opportunity for Infill Development
5. Expressed Interest from Property Owners/Developers
6. Unique Site Characteristics (Low Utilization/Blighted Conditions)

1. Oversupply of Retail

Local market trends were presented to the City council by the Kosmont Companies in May of 2021, in a presentation entitled "Resetting the Economic Development Table: Public and Private Investment Beyond COVID". The presentation noted that store closures and e-commerce is driving changes at malls and retail centers and that retail downsizing is being replaced by new blended use, including residential. Lake Forest is "over-retailed" and the quality of existing retail centers continues to diminish. There is no evidence that commercial development will expand in Lake Forest; in fact, pressure to redevelop commercial property into mixed-use or residential projects is extremely high. The City of Lake Forest has historically had two concentrations of commercial activity: the area adjacent to the Interstate 5 Freeway at El Toro Road and Lake Forest Drive and the Foothill Town center north of the Foothill Corridor State Highway 241. The El Toro Road corridor is flanked by large commercial centers that served as a hub of activity in the Saddleback Valley in the 1970's and 80's. In contrast, the Foothill Towne Center, north of the 241 includes a mix of big box retailers, in-line commercial tenants, movie theatres and offices. The El Toro Road corridor must now compete with commercial centers on the south side of the I-5 Freeway, including a planned mixed-use site on a former regional mall in Laguna Hills and the Irvine Spectrum located 2 miles to the north along the I-5. Irvine Spectrum includes 1.2 million square feet of retail, restaurant and entertainment uses. Faced with this strong retail competition to the north and aging and dated commercial centers adjacent to the I-5 corridor, property owners have expressed strong interest in transitioning to residential and mixed-use projects.

2. Discontinuation of Office Uses

The City finds that the COVID-19 pandemic will have a real impact on commercial real estate and that office use will decline in demand as businesses maintain a long-term work from home option. A Cushman & Wakefield Orange County market report prepared for the Orange County market indicates office vacancies have been on the rise over the past year and are presently at 15.9% (Cushman & Wakefield, Marketbeat OC Office, Q2 2021). Moreover, in Lake Forest, the redevelopment of an underutilized office property into an affordable housing project (Mountain View) demonstrates that the market is ready to take advantage of the opportunity to repurpose sites in Lake Forest for residential uses, including affordable housing.

3. Known Vacancies/Buildings for Rent or Sale

The City has conducted an inquiry to identify vacancies and buildings for rent or sale in Lake Forest that are included in Appendix A. Many of the sites identified in the inventory have vacancies, and in some cases, the entire site is unoccupied (as of December 2021). These sites are particularly well-suited for redevelopment because property owners are incentivized to think about the highest and best use of their property to maximize profit in the face of vacancies.

4. Opportunity for Infill Development

The retail areas in Foothill Towne Center, which are dominated by big-box retailers and abundant surface parking, have been impacted by changing consumer preferences in shopping with the explosion of e-commerce facilities. According to a report from CBRE Group, e-commerce will account for 26% of all retail sales in the US by 2025. The Towne Center area also includes an auto mall, with only one dealer left in operation. Two dealerships closed in the 2000's and were replaced with 219 units of medium density residential uses. At this location, the City anticipates that existing retail uses can and will stay, and new residential development can be accommodated at the location without demolishing existing uses. This pattern is seen at Laguna Hills Mall where new residential development will be introduced at an aging mall, revitalizing the project area for residential and nonresidential tenants.

5. Expressed Interest from Property Owners/Developers

The City regularly receives inquiries from the development community regarding opportunities in the El Toro and Lake Forest Focus Areas. Of note, the new owner of a 9-story office building and surrounding fast food uses has met with the City and informed staff that the lease of the tenant of the office building will expire in 2024. The owner has engaged a design team and prepared preliminary concepts for the development of office and residential on the entire property holding. Sites where developers and/or property owners have expressed interest in developing residential uses in the site are identified in Appendix A.

6. Unique Site Characteristics (Low Utilization/Blighted Conditions)

Lastly, the City has visually inspected each site to determine if the existing uses represent a reasonable utilization of the site based on similar financially successful projects/centers in the region or if there are unique visual characteristics that would indicate the site is not well-maintained and property owners may be interested in selling the property for a higher return. In particular, the City considered the site's existing parking configuration (including whether the parking lots appear regularly occupied), ingress/egress issues, the visual condition of the building and landscaping (whether or not it's in need of repair), and other factors present through a visual inspection. Given the oversupply of retail and availability of retail options in the City and region, marginal uses and buildings are not expected to continue remaining competitive and their corresponding property value is likely higher with the option to develop residential uses on the site.

Suitability of Nonvacant Sites Findings

The City has specifically analyzed whether existing uses constitute an impediment for residential uses on the site. Additional information provided in Appendix A demonstrates that existing uses on the sites identified to accommodate a portion of the City's RHNA **do not constitute an impediment for residential uses on the site.** Additional information regarding current operations and tenants, vacancies, properties listed for rent or sale, the demand for the current use, and contact with property/business owners are included. The City has considered each site individually and has concluded that based on the substantial evidence provided, current uses are not an impediment to the sites redevelopment for residential uses.

REALISTIC CAPACITY

To date (September 2021), no projects have been developed on sites designated (2020) for mixed-use in the 2040 General Plan. In order to determine a realistic development capacity estimate for the mixed-use designated areas, the City assumed that these sites will only develop at 50% of their development potential. This conservative estimate considers the following capacity factors, as identified in housing element statute (Gov. Code section 65583.2(c)(2)): land use controls and site improvements, realistic capacity of the site, and typical densities. Of the five factors only land use controls and site improvements, realistic capacity of the site, and typical densities are relevant when considering the capacity of sites in Lake Forest; infrastructure constraints and environmental constraints are not applicable. While the underlying zoning currently allows for 100 percent nonresidential uses, the City has not seen any applications or had preapplication discussions for mixed-use projects where residential uses represent anything less than 80% of the site's development potential. The City finds that it is not financially feasible or desirable for developers to redevelop *any* of the sites listed in the Housing Element inventory for 100% nonresidential uses. In an abundance of caution, the City has applied a 50% reduction to the maximum site capacity, but all evidence (including the Kosmont study) suggests that residential uses will comprise the vast majority of new development in the City, even if the underlying zone allows for 100% nonresidential uses.

Table 64 summarizes how the various factors identified in housing element statute (Gov. Code section 65583.2(c)(2)) result in an adjusted site capacity of 50 percent the maximum densities in the mixed-use districts.

TABLE 64: CAPACITY ADJUSTMENT FACTORS – MIXED-USE ZONES

Capacity Factor	Adjustment	Reasoning
Land use controls and site improvements	90%	For net acreage due to on-site improvements (sidewalks, easements)
Realistic capacity of the site	85%	Adjustment based on past redevelopment trends in mixed-use zones in Orange County and programs to incentivize development in mixed-use areas
Typical densities	75%	Based on Table 60, market rate projects develop between 70-80% of maximum capacity but affordable housing projects are more likely to be built out to maximum or above-maximum (through density bonus provisions) density
Infrastructure availability	No adjustment	Not applicable, no constraint
Environmental constraints	No adjustment	Not applicable, no constraint

Source: City of Lake Forest, 2021

CAPACITY TO ACCOMMODATE UNMET RHNA ALLOCATION

The City of Lake Forest's 6th Cycle residential capacity falls into three categories:

- 1) Accessory dwelling units
- 2) Underutilized residential sites, and
- 3) Underutilized sites in mixed-use areas.

As described throughout this section, the City has sufficient land appropriately designated in the General Plan for residential uses throughout the community to accommodate its RHNA allocation for the 2021-2029 planning period and the City is currently undertaking a Zoning Code Update to implement the land use designations included in the General Plan (see [Housing Plan Program 1](#)). Moreover, Lake Forest has a proven track record of supporting development of affordable housing, working with affordable housing developers, promoting home types that are affordable to lower-income households, including multifamily projects and mixed-use developments, and addressing

needs of the community's vulnerable populations, including seniors. Sites designated to accommodate the City's RHNA allocation for the 2021-2029 planning period are illustrated on Figure 2, *Housing Sites Inventory*, and detailed in Appendix A.

Accessory Dwelling Units

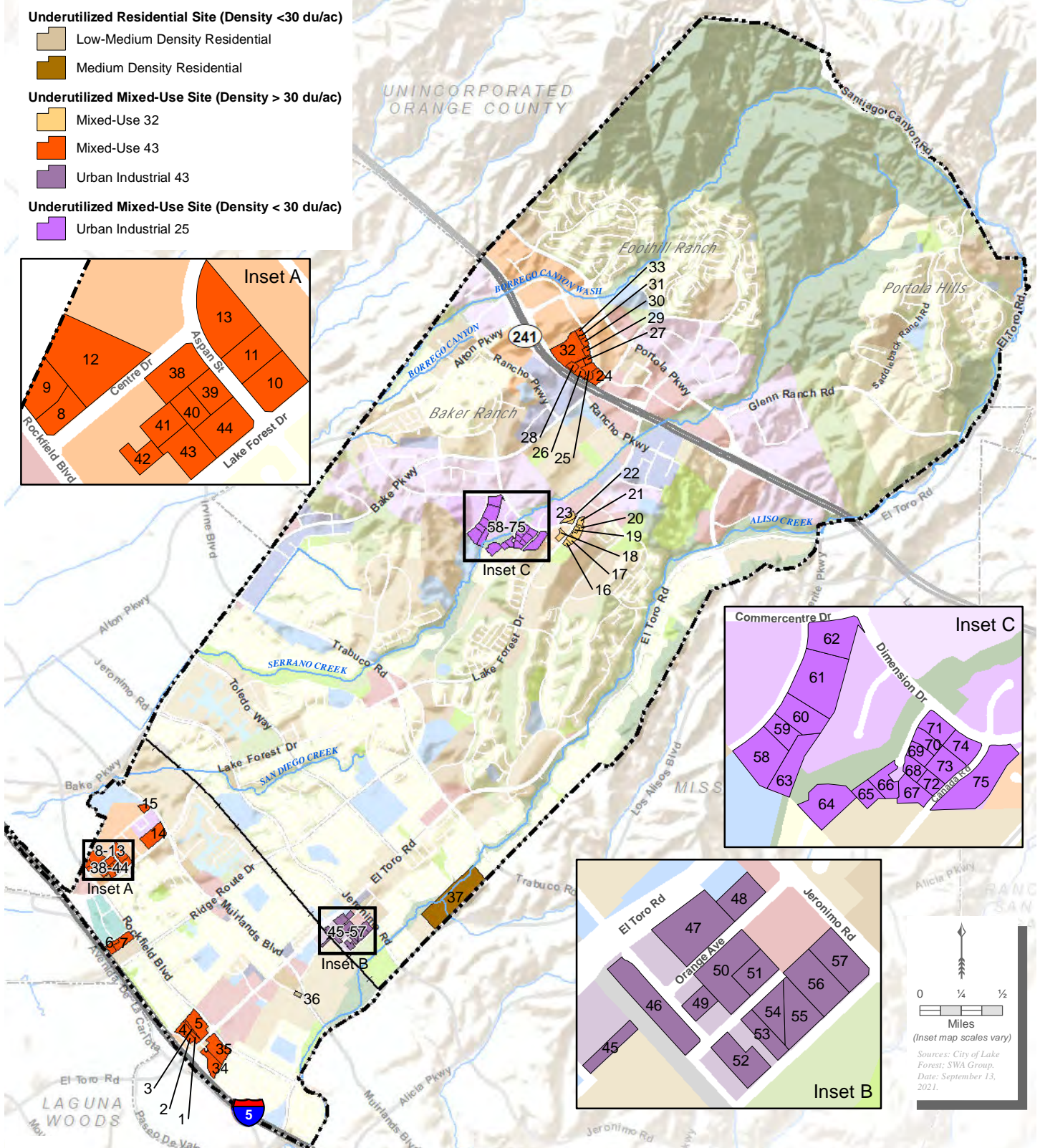
In January 2020, new State legislation pertaining to Accessory Dwelling Units (ADUs) went into effect. The legislation amended Government Code Sections 65852.2 and 65852.22. The City subsequently updated its zoning ordinance for consistency with State law.

The City approved two ADUs in 2018, three ADUs in 2019, and seven ADUs in 2020. The City has taken significant proactive steps to advertise the opportunity for residents to construct ADUs, including information on the City's website, hosting presentations to the Planning Commission and City Council, and answering questions from the public in-person at City Hall and over the telephone.

Lake Forest made a conservative estimate of the number of ADUs that will meet a portion of the City's RHNA obligation. The City used the average annual number of ADUs constructed over the past three years multiplied by 8 (the number of years in the planning period), to estimate the number ADUs (at a minimum) to be constructed during the planning period.

The average annual number of ADUs developed from 2018-2020 was 4, multiplied by 8, yields the estimate of 32 ADUs to be constructed between 2021 and 2029. This is a conservative assumption and production will likely outpace this target during the planning period. Additionally, the affordability level of these ADUs is assumed to be consistent with the findings of SCAG's ADU affordability study and the findings for Orange County.

Figure 2: 2021-2029 Housing Element Site Inventory



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FINAL DRAFT

Underutilized Residential Sites

The City has identified two properties currently designated for residential development as suitable for accommodating a portion of the City's moderate and above moderate-income RHNA allocation.

The first site is an 0.63 acre site designated for low-medium density residential. This site is the last remaining vacant residentially-designated site in the City and can accommodate up to 8 units for above moderate income households.

The City has identified Saddleback Ranch Apartments as an opportunity site for redevelopment. Saddleback Ranch Apartments is currently developed with 304 multifamily units (approximately 9 du/ac), which is significantly less than the maximum allowable density of 25 du/ac. To determine the development potential of this site, the City assumed that redevelopment would occur at 80% of the maximum density (678 units) and subtracted the number of existing units (304) to arrive at a potential additional yield of 374 units. Half of the potential additional units (187) are assumed to be affordable to moderate-income households and half to above moderate-income households.

The owners of the Saddleback Ranch Apartments have met with the City on 3 separate occasions in the last 10 years to discuss their plans to demolish the existing buildings and construct a new 3-4 story apartment project. The property owner continues to indicate that there is an interest in redeveloping the site at a higher density consistent with the current land use designation and zoning standards. The property was constructed over 30 years ago, and is now reaching the end of its useful life. Significant remains and improvements (e.g., plumbing, electrical, and roof repairs) will need to be made to the property to keep it functioning in the coming years and it is likely that the site is now poised to redevelop given the immediate investments that will be required. Additionally, the City of Mission Viejo, located immediately to the property's east, has identified sites to accommodate its RHNA in proximity to Saddleback Apartments. There is an energy and interest for redevelopment of these sites which spans jurisdictional boundaries. Given the age of the building, repairs required to maintain the existing use, the site of the site and development potential (in an area with very few sizable sites designated for multifamily development), the City finds that this is a suitable site to accommodate a portion of the City's moderate and above-moderate income RHNA.

These vacant properties, identified in Table 65, have the potential to yield 382 units. None of these units are assumed to be affordable to lower income households.

TABLE 65: SUMMARY OF RESIDENTIAL DEVELOPMENT POTENTIAL ON GENERAL VACANT SITES

General Plan	Zoning	Max Density	Acres	Realistic Capacity (units)*	Affordability
Low-Medium Density Residential (APN 617-064-18)	R2 Multifamily Dwellings	15 du/ac	0.63	8	Above Mod
Medium Density Residential (APN 613-351-05)	R2 Multifamily Dwellings	25 du/ac	33.92	374**	Moderate/ Above Mod
Total			448.8	382	

Notes:

* Unit count is based on 80 percent of the maximum site density. This estimate is based on existing patterns of development in residential areas.

~~** The City has identified Saddleback Apartments as an opportunity site for redevelopment. Saddleback Apartments is currently developed with 304 multifamily units (approximately 9 du/ac), which is significantly less than the maximum allowable density of 25 du/ac. To determine the development potential of this site, the City assumed that redevelopment would occur at 80% of the maximum density (678 units) and subtracted the number of existing units (304) to arrive at a potential additional yield of 374 units. Half of the potential additional units (187) are assumed to be affordable to moderate-income households and half to above moderate-income households.~~

Underutilized Sites in Mixed-Use Areas

As described in the City's Land Use Element, new residential growth is anticipated to occur in mixed-use focus

areas located throughout the City. Although the General Plan identifies opportunities for development of up to 11,500 units in all of its mixed-use areas, for the purpose of this Housing Element and identifying the remaining units needed to meet the City's assigned housing need, only highly desirable and suitable mixed-use parcels larger than 0.50 acres are included in this portion of the sites inventory. Of the 56 underutilized parcels identified in mixed-use areas which are planned to accommodate a portion of the City's lower income RHNA, only one site (in the Foothill Ranch Towne Center) is larger than 10 acres. However, the City chose to include this site in its inventory due to the changing nature of the movie business and the potential for this large parcel to develop residential units on a portion of its existing surface parking area. The development potential at this site is 342 units. If the site were excluded from the inventory, the City would still have sufficient capacity to accommodate its RHNA allocation at all income levels.

Only 50% of the development potential at mixed-use sites has been allocated to accommodate the City's RHNA allocation, to account for potential mixed-use and non-residential development on portions of the sites. For example, a vacant two-acre parcel designated as Mixed-Use 32, which allows a density of 30 or more du/ac, is assumed a yield of 32 units for purposes of meeting the RHNA allocation. By building in this generous buffer, the City may accommodate development at levels higher than those identified in the sites inventory while ensuring sufficient site availability for units affordable to lower-income households for the duration of the planning period.

Table 66 summarizes the City's inventory of underutilized sites in mixed-use areas. Available sites are shown in Figure 19 and are described in detail in Appendix A.

TABLE 66: SUMMARY OF RESIDENTIAL DEVELOPMENT POTENTIAL ON UNDERUTILIZED MIXED-USE SITES

General Plan	Zoning*	Max Density	Acres	Realistic Capacity (units)**	Affordability Level
Mixed-Use 32	MU-32	32 du/ac	10	161	Ex Low/Very Low, Low, Mod
Mixed-Use 43	MU-43	43 du/ac	97	2,039	Ex Low/Very Low, Low, Mod
Urban Industrial 25	UI-25	25 du/ac	35	426	Mod, Above Mod
Urban Industrial 43	UI-43	43 du/ac	16	339	Ex Low/Very Low, Low, Mod
Total			159	2,965	

Notes:

* The City adopted its comprehensive General Plan Update in June 2020 and immediately began work on an update to its Zoning Code to create new zoning districts to implement the City's new mixed-use land use designations. The new zoning districts are expected to be adopted by early 2022.

** Only 50% of the total potential yield at mixed-use sites has been identified to accommodate the City's RHNA to account for the potential for mixed-use and non-residential development on a portion of the sites. Projects can be 100% residential.

As part of the City's General Plan Update, over 383 acres were designated for mixed-use development allowing for densities of at least 30 du/ac. This Housing Element only relies on 123 acres of the 383 acres designated for such development, or just over 32%. In addition, given that the City has assumed only a 50% yield at mixed-use sites (regardless of density), the City has developed extremely conservative estimates regarding future development potential. It is entirely possible that new development will exceed capacities identified in the Housing Element and more closely reflect the development potential identified and analyzed as part of the City's comprehensive General Plan update.

The City has a successful history of redevelopment of underutilized/developed sites. Successful projects include:

- Foothill Ranch Auto Center: The Foothill Ranch Auto Center, which was previously designated for commercial development, was rezoned and redeveloped as a mixture of single-family and multifamily residential uses.
- Mountain View: The Mountain View affordable project includes demolition of an underutilized office building to allow for development of 71 units (70 affordable units).
- The Meadows (formerly "Nakase"): The Meadows property (approximately 122 acres) was previously a wholesale plant nursery. It is currently (2021) entitled for development of up to 606 units and will include deed-restricted affordable units.
- Parkside: Toll Brothers redeveloped an underutilized 30-acre industrial site, (located northwest of the Rancho Parkway/Portola Parkway intersection) previously used as a sand and gravel mine, with 195 single-family dwellings.
- Encanto: The Encanto project consists of 52 single-family residential units on 5.75 acres that was formerly designated Light Industrial by the General Plan and changed to Low-Medium Density Residential. The site was previously undeveloped but was home to temporary uses.
- Opportunity Study Area (OSA): The vast majority of residential development experienced by the City over the last 15 years is a direct result of redevelopment of underutilized sites included in the City's Opportunities Study Area (OSA). Following City Council approval of a General Plan Amendment, Zone Change, and Development Agreements, which paved the way for redevelopment of 838 acres of land previously zoned for business and industrial uses (on 5 large properties), the development community moved forward with preparing and submitting project applications within 3 months.

Regionally, Lake Forest's neighbors (including Laguna Woods, Mission Viejo, Irvine, and others) are experiencing similar patterns of redevelopment of underutilized sites at densities and intensities not previously seen in the South County area. Development in these cities demonstrates the viability of redevelopment of underutilized sites in the region consistent with the City's assumptions regarding development interest and viability. Recently, in the City of Mission Viejo, a Home Depot center was redeveloped into housing, new residential development was added next to Trader Joe's in Laguna Hills, and the Laguna Hills Mall is adding significant new housing as part of a redevelopment of the underutilized commercial property.

In April of 2021, the City entered into a contract with SWA, an urban planning and design consultant, to prepare the Development Standards for the new Mixed-Use land uses categories included in the General Plan. SWA has teamed up with Economic & Planning Systems (EPS) and economic consultant. While SWA will draft development standards, including density, height, massing, form and setbacks, and prepare Development Standard Feasibility Test for one large site in each of the 5 Focus Areas to ensure that the allowable density for residential uses can be achieved. EPS will prepare a corresponding proforma cash flow model for each of the tests to simulate the project economics of the concepts from the perspective of a private developer to evaluate the economic feasibility.

ENVIRONMENTAL CONSTRAINTS

The sites inventory analysis reflects land use designations and densities established in the recently (2020) adopted Land Use Element. Thus, any environmental constraints that would lower the potential yield (e.g., fire hazards) have already been accounted for. Any additional constraints that would occur on a more detailed site review basis would be addressed as part of the individual project review process.

The City's capacity to meet its RHNA allocation is not constrained by environmental conditions.

ADEQUACY OF SITES FOR RHNA

As described in the previous section, the City was allocated 3,236 housing units by the SCAG Regional Housing Needs Assessment (RHNA) for 2021 through 2029. The City's progress to date includes ~~755~~ 461 units that have been constructed, are under construction, or have received building permits since June 30, 2021. The City also has an additional ~~755~~ 976 units that have been approved/entitled. The City has 1,8476 units remaining to be

accommodated.

As shown in Table 67, the City has adequate sites to accommodate the RHNA for all income levels. For lower income units (extremely low income, very low income, and low income), the City has a remaining allocation of ~~1,306~~1,295 units and can accommodate 1,779 units on sites that allow densities of at least 30 units per acre, consistent with the assumptions for lower income sites established by Government Code Section 65583.2(c)(3)(B)(iii). This is further supported by the City's history of successful redevelopment of underutilized sites, including the development of affordable projects. The City also has a surplus of sites for moderate and above moderate-income units.

TABLE 67: COMPARISON OF RHNA CANDIDATE SITES REALISTIC CAPACITY AND RHNA

Candidate Sites	Extremely and Very Low income (0-50% AMI)	Low income (51-80% AMI)	Moderate income (81-120% AMI)	Above Moderate income (121%+ AMI)	Total
Remaining 6th Cycle RHNA	848	445 447	558 552	0 (with a surplus of 118 48 units)	1,847 6
ADUs	8	14	9	1	32
Underutilized Residential Sites*	0	0	187	195	382
Underutilized Sites in Mixed-Use Areas*	1,167	608	979	218	2,965
Total	+ 327 329 (surplus)	+ 177 (surplus)	+ 622 618 (surplus)	+ 532 456 (surplus)	+ 1,656 1,579 (surplus)

Notes:

*The realistic capacity analysis of underutilized residential land assumes that only 80% of the potential capacity would be realized. The realistic capacity analysis of underutilized sites in mixed-use areas assumes that only 50% of the potential capacity of development at 30 du/ac would be realized. If the sites develop closer to their maximum capacity, which has been realized as part of past projects, the City's surplus of units affordable to lower-income households would be significantly higher.

5D. Housing, Financial, and Administrative Resources

STATE AND FEDERAL RESOURCES

Community Development Block Grant Program (CDBG)

Federal funding for housing programs is available through the Department of Housing and Urban Development (HUD). The City's use of federal funds is described in the 2020-2024 Consolidated Plan. As an Entitlement City, Lake Forest participates in the Community Development Block Grant (CDBG) program. CDBG funds are used by the City to fund its Housing Rehabilitation Loan Program (see Program 11). The City does not currently participate in other HUD programs such as HOME, Emergency Shelter Grant (ESG) or Housing Opportunities for Persons with AIDS (HOPWA).

HOME Investment Partnership

Funds are granted by a formula basis from HUD to increase the supply of decent, safe, sanitary, and affordable housing to lower income households. Eligible activities include new construction, acquisition, rental assistance and rehabilitation. The City participates in the Orange County-administered HOME Program, which administers HOME funds to projects in participating jurisdictions. County-administered HOME funds for first time homebuyer assistance are made available to residents or employees of the local jurisdictions participating in the HOME program. New development projects are typically allocated funding on a competitive basis.

Housing Choice Voucher Program Rental Assistance (Formerly "Section 8")

The City of Lake Forest works cooperatively with the Orange County Housing Authority, which administers the Housing Choice Voucher Program. The program assists very-low-income, elderly and disabled households by paying the difference between 30% of an eligible household's income and the actual cost of renting a unit. The City facilitates use of the voucher program within its jurisdiction by encouraging apartment owners to list available rental units with the County Housing Authority for potential occupancy by tenants receiving vouchers.

Project Based Housing Voucher program is a component of the former Section 8 Housing Choice Voucher program funded through HUD. The program's objective is to induce property owners to make standard housing available to low-income families at rents within the program limits. In return, the Housing Authority or HUD enters into a contract with the owner that guarantees a certain level of rents.

Section 811/202 Program (Supportive Housing for Persons with Disabilities/Elderly) – Non-profit and consumer cooperatives can receive no interest capital advances from HUD under the Section 202 program for the construction of very-low income rental housing for seniors and persons with disabilities. These funds can be used in conjunction with Section 811, which can be used to develop group homes, independent living facilities and immediate care facilities. Eligible activities include acquisition, rehabilitation, new construction and rental assistance.

California Housing Finance Agency (CalHFA) Multifamily Programs

Provides permanent financing for the acquisition, rehabilitation, and preservation or new construction of rental housing that includes affordable rents for Low and Moderate income families and individuals. One of the programs is the Preservation Acquisition Finance Program that is designed to facilitate the acquisition of at-risk affordable housing developments and provide lowcost funding to preserve affordability.

CalHOME Program

Provides grants to local public agencies and non-profit developers to assist households in becoming homeowners. CalHome funds may be used for predevelopment, development, acquisition, and rehabilitation costs as well as downpayment assistance. While CalHOME funding has been limited to disaster assistance in recent years, this would be an appropriate program for the City to pursue to begin to develop a local portfolio of housing assistance programs and funds.

California Housing Finance Agency (CHFA)

Offers permanent financing for acquisition and rehabilitation to for-profit, non-profit, and public agency developers seeking to preserve "at-risk" housing units. In addition, CHFA offers low interest predevelopment loans to nonprofit sponsors through its acquisition/rehabilitation program.

Emergency Housing and Assistance Program (EHAP)

Provides funds to local government agencies and non-profit corporations for capital development activities and facility operation for emergency shelters, transitional housing and safe havens that provide shelter and supportive services for homeless individuals and families. No current funding is offered for this program.

Federal Home Loan Bank System

Facilitates Affordable Housing Programs (AHP), which subsidize the interest rates for affordable housing. The San Francisco Federal Home Loan Bank District provides local service within California. Interest rate subsidies under the AHP can be used to finance the purchase, construction, and/or rehabilitation of rental housing. very low-income households must occupy at least 20% of the units for the useful life of the housing or the mortgage term.

Housing for a Healthy California (HHC)

Provides funding on a competitive basis to deliver supportive housing opportunities to developers using the federal National Housing Trust Funds (NHTF) allocations for operating reserve grants and capital loans. The Department will also utilize from a portion of moneys collected in calendar year 2018 and deposited into the Building Homes and Jobs Trust Fund to provide funding through grants to counties for capital and operating assistance. Funds will be announced through a Notice of Funding Availability.

Infill Infrastructure Grant Program (IIG)

Funds infrastructure improvements to facilitate new housing development with an affordable component in residential or mixed-use infill projects and infill areas.

Low-Income Housing Tax Credit Program

The Low-Income Housing Tax Credit Program was created by the Tax Reform Act of 1986 to provide an alternate method of funding low-and moderate-income housing. Each state receives a tax credit, based upon population, toward funding housing that meets program guidelines. The tax credits are then used to leverage private capital into new construction or acquisition and rehabilitation of affordable housing. Limitations on projects funded under the Tax Credit programs include minimum requirements that a certain percentage of units remain rent-restricted, based upon median income, for a term of 15 years. [The City has included Program 5: Facilitate Affordable and Special Needs Housing Construction to continue assisting developers in gaining funding for the development of affordable housing through the LIHTC program.](#)

Low-income Housing Preservation and Residential Home Ownership Act (LIHPRHA)

Requires that all eligible HUD Section 236 and Section 221(d) projects “at-risk” of conversion to market-rate rental housing through the mortgage prepayment option be subject to LIHPRHA Incentives. The incentives to owners include HUD subsidies which guarantee owners an 8% annual return on equity. Owners must file a Plan of Action to obtain incentives or offer the project for sale to a) non-profit organizations, b) tenants, or c) public bodies for a 12 month period followed by an additional three-month sale to other purchasers. Only then are owners eligible to prepay the subsidized mortgages.

National Housing Trust Fund

A permanent federal program with dedicated sources of funding not subject to the annual appropriations. The funds can be used to increase and preserve the supply of affordable housing, with an emphasis on rental housing for extremely low income households. California is receiving approximately \$10.1 Million for the program in 2019. Funds will be made available through a competitive process and will be announced through a Notice of Funding Availability.

SB 2 Planning Grants Program

Provides one-time funding and technical assistance to all eligible local governments in California to adopt and implement plans and process improvements that streamline housing approvals and accelerate housing production. Eligible activities include updating a variety of planning documents and processes such as general plans and zoning ordinances, conducting environmental analyses, and process improvements that expedite local planning and permitting. The planning grants program is funded through the Building Homes and Jobs Act Trust Fund (SB 2, Chapter 364, Statutes of 2017). The City applied for funds through this program and was approved for funding of various programs.

California Community Reinvestment Corporation (CCRC)

A multifamily affordable housing lender whose mission is to increase the availability of affordable housing for Low-income families, seniors and residents with special needs by facilitating private capital flow from its investors for debt and equity to developers of affordable housing. Eligible activities include new construction, rehabilitation and acquisition of properties.

Southern California Housing Finance Agency (SCHFA) Mortgage Financing for First-Time Homebuyers

The SCHFA raises funds for mortgage financing through the sale of tax-exempt revenue bonds. The City cooperates with lenders and the County in advertising the availability of the SCHFA program.

Supplement Security Income (SSI)

A federal welfare program for persons 65 and over and for blind or disabled persons of any age. "Disabled" means that you have a physical or mental disability that is expected to keep you from working for 12 months or longer, or will result in death. Medicare is a federal health insurance program for people who are 65 and over, for some younger people with permanent disabilities, and for people with end-stage kidney disease. SSI may provide total monthly income or it may supplement a low income. In addition to cash payments, SSI recipients are automatically covered by Medi-Cal, the state health insurance plan.

ADMINISTRATIVE RESOURCES

Agencies with administrative capacity to implement programs contained in the Housing Element include the City of Lake Forest and local and regional nonprofit private developers. The City of Lake Forest Community Development Department takes the lead in implementing Housing Element programs and policies. The City also works closely with non-profit developers to expand affordable housing opportunities in Lake Forest.

COMMUNITY DEVELOPMENT DEPARTMENT

The Community Development Department consists of four divisions: Planning, Housing, Building and Safety, and Code Enforcement. The Department coordinates development activity within the City to ensure planned orderly growth. The Planning Division administers the General Plan and Zoning Code, the California Environmental Quality Act (CEQA) and other environmental regulations, and provides primary staff assistance to the Planning Commission. The Housing Division manages the City's Community Development Block Grant.

NON-PROFIT DEVELOPERS

The City collaborates with a number of affordable housing developers and service providers to accommodate the housing needs of Lake Forest residents. The following are housing developers and service providers active in the region; several are included in the State's list of entities with the legal and managerial capacity to acquire and manage at-risk projects.

- C&C Development
- The Waterford Group
- Community Housing Works
- National Community Renaissance (National CORE)
- The City has included Program 5: Facilitate Affordable and Special Needs Housing Construction to work closely with developers to expand the range of affordable housing options in Lake Forest.

5E. Energy Conservation Opportunities

State of 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 nearly \$80 billion in electricity and natural gas costs since 1978.^{5F}

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.

Examples of techniques for reducing residential energy use include the following:

- Glazing – Glazing on south facing exterior walls allows for winter sunrays to warm the structure. Reducing glazing and regulating sunlight penetration on the west side of the unit prevents afternoon sunrays from overheating the unit.
- Landscaping – Strategically placed vegetation reduces the amount of direct sunlight on the windows. The incorporation of deciduous trees in the landscaping plans along the southern exposure of units reduces summer sunrays, while allowing penetration of winter sunrays to warm the units.
- Building Design – The implementation of roof overhangs above southerly facing windows shield the structure from solar rays during the summer months.
- Cooling/Heating Systems – The use of attic ventilation systems reduces attic temperatures during the summer months. Solar heating systems for swimming pool facilities saves on energy costs. Natural gas is conserved with the use of flow restrictors on all hot water faucets and showerheads.
- Weatherizing Techniques – Weatherization techniques such as insulation, caulking, and weather stripping can reduce energy use for air-conditioning up to 55% and for heating as much as 40%. Weatherization measures seal a dwelling unit to guard against heat gain in the summer and prevent heat loss in the winter.
- Efficient Use of Appliances – Appliances can be used in ways that increase their energy efficiency. Unnecessary appliances can be eliminated. Proper maintenance and use of stove, oven, clothes dryer, washer, dishwasher, and refrigerator can also reduce energy consumption. New appliance purchases can be made on the basis of efficiency ratings.
- In addition to the requirements of Title 24, the City encourages energy conservation through its land use planning policies. Lake Forest contains a mix of housing, employment, commercial, recreation, educational and other community facilities. Lake Forest is located within a jobs-rich portion of south Orange County giving the residents of the City access to a variety of jobs within a short driving distance. Other opportunities for energy efficiency include the following:
 - Voluntary Green Building program for residential remodels
 - Implementation of Citywide design guidelines
 - Energy efficient improvements, including window replacement, are eligible for rehabilitation loan program
 - The City's existing network of on- and off-road bicycle trails link residential areas to employment centers within Lake Forest and surrounding cities.

6. Affirmatively Furthering Fair Housing

All Housing Elements due on or after January 1, 2021 must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of July 16, 2015. Under State law, affirmatively further fair housing means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics”. These characteristics can include, but are not limited to, race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The AFFH analysis must contain the following:

- A: Outreach
- B: Assessment of Fair Housing
 - Key Data and Background Information
 - Fair Housing Enforcement and Outreach Capacity
 - Integration and Segregation Patterns and Trends
 - Racially or Ethnically Concentrated Areas of Poverty
 - Disparities in Access to Opportunity
 - Disproportionate Housing Needs in the Jurisdiction
 - Displacement Risk
- C: Sites Inventory
- D: Identification of Contributing Factors
- E: Goals and Actions

While this section provides a focused analysis of fair housing issues in Lake Forest, several other sections of the Housing Element address the issue and are included in this section by reference.

6A. Outreach

Appendix B of the Housing Element details the public participation that was undertaken as part of the Housing Element preparation process. The City of Lake Forest has made an effort to involve the public in the update of its Housing Element and has solicited input from the public throughout the year-long Housing Element process. The City provided ongoing notification to local housing service providers that represent lower income and special needs populations, such as The Kennedy Commission, Welcoming Neighbors Home, and the Fair Housing Council of Orange County and conducted interviews with each. Appendix B to the Housing Element provides a summary of the key comments received during the Housing Element update process, and how they have been considered and addressed in the Element. The City implemented the following public outreach program.

PROJECT WEBSITE

A dedicated project website (<https://lakeforest.generalplan.org/>) serves as the main conduit of information for individuals who can access material online. The project website launched in January 2018 (first associated with the City's comprehensive General Plan Update) and is regularly updated to reflect ongoing community input opportunities, advertise draft work products, and answer commonly asked questions.

Since the launch of the Housing Element Update in September 2020, the project website received over 1,200 views from 950 unique visitors resulting in a total of 2,700 pageviews. The peak of activity happened coincident with the online surveys in December 2020.

VIRTUAL WORKSHOP

As part of the community outreach, a virtual community workshop was conducted to educate the community about housing issues and opportunities facing Lake Forest, and to gather input on housing-related topics. The virtual workshop was hosted on the project website throughout the month of December 2020. The extended timeframe was intended to allow community members and stakeholders to participate at their leisure and in accordance with their schedule and availability. The Virtual Community Workshop consisted of three parts:

- Part A: Overview video describing Housing Elements and why they are important
- Part B: PowerPoint presentation describing existing conditions in Lake Forest and the City's Housing Element Update process
- Part C: Housing Element Survey (described below)

HOUSING ELEMENT SURVEY

The City hosted two online Housing Element surveys which were available from November 23, 2020 through December 22, 2020. The surveys asked for input on the community's housing priorities and strategies to address Lake Forest's future housing growth needs. A total of 62 individuals responded to the first survey, which focused on issues of home maintenance, affordability, home type, and living conditions. A total of 49 individuals responded to the second survey, which focused on community priorities related to housing. A summary of the key survey results is provided in the Housing Element Introduction section, with the complete results included in Appendix B.

STAKEHOLDER INTERVIEWS

The City invited key community stakeholders to meet with Staff to discuss housing issues in Lake Forest. The City met with the Kennedy Commission, Welcoming Neighbors Home, and the Fair Housing Council of Orange County. The Fair Housing Council of Orange County provided specific input regarding fair housing issues facing Lake Forest residents, such as access to information and the process for training/educating landlords and tenants, and well as issues facing the region.

COMMUNITY OPEN HOUSE

The City is scheduled to host a community open house on the Public Draft Housing Element in early October 2021. At this open house, the City will present the Public Draft Housing Element and solicit feedback on the Element that will be considered and reflected in the final document. The City will specifically present information related to fair housing and describe the goals, policies, and programs that the City has added to the Housing Element to address this topic.

ADVERTISEMENTS

The City of Lake Forest maintains various social media accounts including Facebook, Nextdoor, and Instagram. Starting in September 2020, and continuing throughout the project, the City posted updates to its social media platforms advertising opportunities to provide input and alerting the public to upcoming meetings and workshops.

EMAILS

The project team compiled a database of community members and stakeholders who registered to be notified via email of future public engagement opportunities and key deliverables. Direct emails were sent to these individuals to publicize the Housing Element Community Meeting, the Online Workshop, the Fair Housing Survey, and the Public Review Draft 2021-2029 Housing Element.

3.1 6B. Fair Housing Needs Assessment

This section presents an overview of available federal, state, and local data to analyze fair housing issues in Lake Forest. This data is supplemented with local knowledge of existing conditions in the community to present a more accurate depiction of fair housing issues in Lake Forest, and a more informed perspective from which to base goals, policies and programs to affirmatively further fair housing.

KEY DATA AND BACKGROUND INFORMATION

In 2016, Lake Forest participated with 15 other Orange County Community Development Block Grant (CDBG) entitlement cities to prepare a regional Analysis of Impediments to Fair Housing Choice (AI) to fulfill their HUD requirement and remove barriers to fair housing choice for all their residents. The AI examined policies, procedures, and practices within the region that may limit a person's ability to choose their residence free from discrimination. The AI provided an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual or a household's access to housing in the region. It also presented local and regional demographic profiles, assessed the extent of housing needs among specific groups, identified existing barriers or impediments that may limit housing choice, and proposed actions to overcome those barriers.

The City's demographic and income profile, household and housing characteristics, housing cost and availability, and special needs populations are discussed in previous sections of this Background Report. Barriers to fair housing choice specific to the City of Lake Forest that were identified in the County AI and the commitments of the City to address identified barriers were incorporated into this AFH. Supplemental data analysis was conducted to further understand potential fair housing issues, within the context of AFH topics, at the city-level. Lake Forest is comprised of 16 Census Tracts, although several are only partially located in Lake Forest. Figure 3 shows the Tract boundaries.

FAIR HOUSING ENFORCEMENT AND OUTREACH CAPACITY

The Orange County Analysis of Impediments to Fair Housing Choice (County AI) was adopted by the Lake Forest City Council in June 2020 and “is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA).”⁸

For the County AI, a variety of tools were used for the community participation process, including community meetings, focus groups and public hearings. The AI preparers also reached out to tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal services providers, social services providers, housing developers, and industry groups to hear directly about fair housing issues affecting residents of Orange County. Evening community meetings were held in Mission Viejo, Westminster/Garden Grove, Santa Ana, and Fullerton. Additional outreach was conducted for members of protected classes, including the Latino and Vietnamese communities. All community meetings had translation services available if requested in Spanish and Vietnamese. In addition, all meetings were held in locations accessible to people with mobility issue.⁹

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

During the 2019-2020 report period the City of Lake Forest took the following actions (on its own or in cooperation with regional partners and the Fair Housing Council of Orange County (FHCOC)) to overcome impediments to fair housing choice identified in the regional AI and demonstrate and implement its outreach capacity to provide outreach and education to assure community members are well aware of fair housing laws and rights:

- **Fair Housing Community Education** – During 2019-20, the FHCOC regionally conducted or participated in 115 education and/or outreach activities, reaching a culturally and ethnically diverse audience, in which they made participants aware of fair housing laws and counseling services (including services to help households improve their readiness for a home purchase). Three of these activities took place in the city of Lake Forest. Regionally, over 1,900 people were served by these activities. Through its various regional outreach efforts FHCOC distributed over 36,150 pieces of literature on fair housing, FHCOC’s services and other housing-related topics, in either English, Spanish or Vietnamese. Additionally, throughout Orange County FHCOC held 21 training sessions for rental property owners/managers. FHCOC presented 2 fair housing seminars for housing providers in cooperation with the Apartment Association of Orange County (AAOC), at AAOC’s Santa Ana office. Nineteen general fair housing workshops intended for attendance by either housing consumers and/or providers were held throughout Orange County. One landlord workshop and two tenant workshops occurred in Lake Forest.
- **Fair Housing Enforcement** – On a regional basis, FHCOC staff received 96 allegations of housing discrimination and opened 40 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. Four allegations arose from Lake Forest, however none resulted in the opening of a case file involving housing in Lake Forest. On a regional basis, FHCOC also conducted 114 paired on-site, systemic tests for discriminatory rental housing practices, including 4 for real estate brokerage transactions and 4 for pre-application lending transactions, with 3 of these systemic tests occurring in Lake Forest.

⁸ *Orange County Analysis of Impediments to Fair Housing Choice*, Prepared by the Orange County Jurisdictions and the Lawyers’ Committee for Civil Rights Under Law, August 6, 2020.

⁹ *Orange County Analysis of Impediments to Fair Housing Choice*, Prepared by the Orange County Jurisdictions and the Lawyers’ Committee for Civil Rights Under Law, August 6, 2020.

- **Housing Dispute Evaluation & Resolution** – On a regional basis, activities provided by FHCOC included assisting 1,984 unduplicated households addressing 7,215 issues, disputes and/or inquiries. Of these, 78 unduplicated households, involving 273 issues, disputes and/or inquiries, were from Lake Forest.
- **Reasonable Accommodations** – On a regional basis, 14 inquiries regarding reasonable accommodations and modifications were received by FHCOC that resulted in casework beyond basic counseling. None of the inquiries arose from Lake Forest. Overall, 13 of the 14 clients requested and received a reasonable accommodation, while another request was denied. It is under consideration as to whether an administrative complaint should be filed with the Fair Housing and Equal Opportunity (FHEO) Office of the U.S. Department of Housing and Urban Development (HUD).
- **Web-based Outreach** – FHCOC's website currently has an on-line housing discrimination complaint-reporting tool that generates an email to FHCOC. The tool is also used for other, non-discrimination, housing-related issues, which sometimes indirectly reveal discriminatory practices. The City of Lake Forest has a link to the FHCOC website where residents can access this information.
- **Monitoring On-line Advertising** – Orange County rentals listed on Craigslist were monitored by FHCOC for discriminatory content (as permitted by staffing limitations). Any discriminatory advertisements were flagged as prohibited and FHCOC responded to these ads through Craigslist's reply mechanism in order to inform the poster of possible discriminatory content. In many instances it was not possible to identify the property address and the identity of the individual making the posting. When investigation was found to be feasible, the ad was referred to FHCOC's investigators for possible additional investigation and enforcement action. Other on-line rental advertising sites (e.g., OC Register, LA Times, Westside Rentals, etc.) were sporadically monitored; however, the lack of an efficient text search function on these sites made monitoring them less practical. Regarding federally protected bases, without exception, among the 'apt / housing' Craigslist rental listings, the identified problematic postings indicated restrictions with regard to children under the age of 18 or improper preference for seniors or 'older adults' for housing opportunities that did not appear to qualify as housing for older persons (age 55 and over). Overt racial or national origin discrimination was not observed. Advertising that continued to limit access to housing for persons utilizing a federally-funded Housing Choice Voucher (often called 'Section 8') or other types of rental assistance was observed despite it having become illegal in California as of January 1, 2020. Advertising in the 'rooms / shared' area of Craigslist were observed to have a higher incidence of stated preferences that violated fair housing law. However due to the practical aspects of resource limitations and case law considerations of shared housing situations, almost none were not acted upon.

The monitoring of regional Craigslist and other advertising resulted in the filing of four complaints with HUD for violations involving familial status, all of which involved Orange County properties, none of which were in Lake Forest. One of these four violations was found on a non-Craigslist platform. The Craigslist monitoring also resulted in the filing of three complaints with the California Department of Fair Employment and Housing (DFEH) for violations of California's source of income protection. These all related to new law, effective January 1, 2020, which made it illegal to discriminate on the basis of a person utilizing a federally-funded Housing Choice Voucher (often called 'Section 8') or other types of rental assistance. One of those complaints involved a property in Orange County.

- **Monitor Home Mortgage Disclosure Act Data** - Ongoing monitoring of Home Mortgage Disclosure Act (HMDA) data continues to be infeasible due to limited resources at FHCOC. FHCOC last was able to conduct such analysis using 2008 data (then the latest available) in conjunction with the preparation of the 2010-2015 Regional AI. Analysis of updated HMDA data from 2013, as well as other mortgage lending practices, was included as part of the City of Lake Forest's FY 2015-2020 Regional Analysis of Impediments to Fair Housing Choice (AI), which was submitted as part of its Five-Year Consolidated Plan FY 2015 - 2019. Some analysis of more recent HMDA data is included in the Orange County 2020-2024 Regional Analysis of Impediments, which is submitted as part of Lake Forest's Five-Year Consolidated Plan FY 2020 – 2024.

The following general progress was also made:

- During 2019-20, FHCOC continued efforts to promote housing affordability within Orange County. It provided services and outreach to organizations involved in the creation and preservation of affordable housing. These groups included the Kennedy Commission, Mental Health Association of Orange County, Radiant Health Centers (formerly Aids Services Foundation), Affordable Housing Clearinghouse, Mary Erickson Community Housing, Jamboree Housing Corporation, Orange County Congregations Community Organizations (OCCC), and Orange County Community Housing Corporation.
- During the 2019-20 report period, FHCOC continued to offer fair housing training sessions that were open to all local government staff. Any staff attending training could receive certification of their attendance.
- The FHCOC produced and provided written fair housing related materials in English, Spanish and Vietnamese to residents of Lake Forest, as well as for distribution at public locations operated by the City of Lake Forest. FHCOC also undertook specific outreach efforts to immigrant populations in low-income neighborhoods. On a regional basis, an estimated 1,150 limited English proficiency households were served during the 12-month program period, through a combination of telephonic contact and in-person education and outreach activities. FHCOC also continued to implement activities under HUD Fair Housing Initiatives Program grants, for both education and outreach and fair housing enforcement. These program efforts specifically targeted fair housing services to persons with disabilities, minority groups and immigrant communities, especially immigrants with limited English proficiency. Program efforts included a fair housing testing program that sought to involve members of immigrant populations with limited English proficiency, both for purposes of enforcing fair housing laws as testers and as a vehicle to increase outreach to these populations.
- Through its status as a HUD-approved Housing Counseling agency, FHCOC assisted individuals, including those with limited English proficiency (LEP), with various housing related problems. This included being available to counsel and assist those who had received loans with documents, all prepared in English, which had terms that were different from what they believed or were informed they were obtaining, or of which they had less than a full understanding. Many of the other counseling activities under its HUD-approved Housing Counseling also assisted individuals with LEP.

The City of Lake Forest complies with fair housing laws and regulations as described in Table 68.

TABLE 68: COMPLIANCE WITH FAIR HOUSING LAWS

<u>Law</u>	<u>Description</u>	<u>Compliance</u>
<u>California Fair Employment and Housing Act (FEHA)</u>	<p><u>The Fair Employment and Housing Act (FEHA) applies to public and private employers, labor organizations and employment agencies.</u></p> <p><u>It is illegal for employers of 5 or more employees to discriminate against job applicants and employees because of a protected category or retaliate against them because they have asserted their rights under the law.</u></p> <p><u>The FEHA prohibits harassment based on a protected category against an employee, an applicant, an unpaid intern or volunteer, or a contractor. Harassment is prohibited in all workplaces, even those with fewer than five employees.</u></p>	<u>Compliance is achieved through strict enforcement in hiring practices and regular training of and by Human Resources staff.</u>
<u>Government Code Section 65008</u>	<u>Covers actions of a city, county, city and county, or other local government agency, and</u>	<u>Compliance is achieved by uniform application of the City's codes.</u>

<u>Law</u>	<u>Description</u>	<u>Compliance</u>
	<p><u>makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.</u></p> <p><u>For example, a violation under Government Code section 65008 may occur if a jurisdiction applied more scrutiny to reviewing and approving an affordable development as compared to market-rate developments, or multifamily housing as compared to single family homes.</u></p>	<p><u>regulations, policies and practices, including development standards, design guidelines, application submittal requirements, fees and approval findings.</u></p>
<u>Government Code Section 8899.50</u>	<p><u>Requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.</u></p>	<p><u>Compliance is achieved through consultations with community stakeholders and support agencies as part of program evaluating and funding decisions. The 6th Cycle Housing Element Housing Plan describes how each Program addresses fair housing issues and contributing factors.</u></p>
<u>Government Code Section 11135 et seq.</u>	<p><u>Requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class.</u></p>	<p><u>Compliance is achieved through promotion/availability of activities and programs to all persons of all backgrounds to participate equally in community programs and activities.</u></p>
<u>Density Bonus Law (Gov. Code, § 65915.)</u>	<p><u>Density bonus law is intended to support the construction of affordable housing by offering developers the ability to construct additional housing units above an agency's otherwise applicable density range, in exchange for offering to build or donate land for affordable or senior units. Density Bonus Law also provides for incentives intended to help make the development of affordable and senior housing economically feasible.</u></p>	<p><u>Compliance is achieved by administration of Lake Forest Municipal Code Chapter 9.152 – Affordable Housing Incentives and Density Bonus Provisions, which provides for compliance with Government Code Section 65915 et seq.</u></p>
<u>Housing Accountability Act (Gov. Code, § 65589.5.)</u>	<p><u>Provides that a local agency shall not disapprove a housing development project, for very low, low-, or moderate-income households, or an emergency shelter, or condition approval in a manner that renders the housing development</u></p>	<p><u>Compliance is achieved through the development review process with is completed consistent with the Housing Accountability Act. Additionally, the City is in the process of preparing objective design</u></p>

<u>Law</u>	<u>Description</u>	<u>Compliance</u>
	<u>project infeasible for development for the use of very low, low-, or moderate-income households, or an emergency shelter, including through the use of design review standards, unless it makes certain written findings, based upon a preponderance of the evidence in the record.</u>	<u>standards to facilitate an objective and equitable review of applicable projects.</u>
<u>No-Net-Loss Law (Gov. Code, § 65863)</u>	<u>Ensures development opportunities remain available throughout the planning period to accommodate a jurisdiction's regional housing need assessment (RHNA) allocation, especially for lower- and moderate- income households.</u>	<u>The City's draft Housing Element identifies a surplus of sites with a capacity to accommodate the City's RHNA allocation. The City has also identified additional sites for accommodating any shortfall that may occur with respect to anticipated development density capacity, that may be added to the site list if necessary.</u>
<u>Least Cost Zoning Law (Gov. Code, § 65913.1)</u>	<u>Provides that, in exercising its authority to zone for land uses and in revising its housing element, a city, county, or city and county shall designate and zone sufficient vacant land for residential use with appropriate standards, in relation to zoning for nonresidential use, and in relation to growth projections of the general plan to meet housing needs for all income categories as identified in the housing element of the general plan.</u>	<u>Compliance is achieved through adoption of the City's comprehensive General Plan Update (2020) and the implementation of Housing Element Housing Plan Program 1 which commits the City to completing the rezoning of sites identified to accommodate the City's RHNA at densities and intensities consistent with those specified by site in Appendix A.</u>
<u>Excessive Subdivision Standards (Gov. Code, § 65913.2.)</u>	<u>Provides that, in exercising its authority to regulate subdivisions a city, county, or city and county shall:</u> <u>(a) Refrain from imposing criteria for design, as defined in Section 66418, or improvements, as defined in Section 66419, for the purpose of rendering infeasible the development of housing for any and all economic segments of the community. However, nothing in this section shall be construed to enlarge or diminish the authority of a city, county, or city and county under other provisions of law to permit a developer to construct such housing.</u> <u>(b) Consider the effect of ordinances</u>	<u>Compliance is achieved through the implementation of a fair and equitable development review process which is administrated consistent with the Excessive Subdivision Standards Act.</u>

<u>Law</u>	<u>Description</u>	<u>Compliance</u>
	<p><u>adopted and actions taken by it with respect to the housing needs of the region in which the local jurisdiction is situated.</u></p> <p><u>(c) Refrain from imposing standards and criteria for public improvements including, but not limited to, streets, sewers, fire stations, schools, or parks, which exceed the standards and criteria being applied by the city, county, or city and county at that time to its publicly financed improvements located in similarly zoned districts within that city, county, or city and county.</u></p>	
<u>Limits on Growth Controls (Gov. Code, § 65302.8.)</u>	<p><u>Provides that, if a county or city, including a charter city, adopts or amends a mandatory general plan element which operates to limit the number of housing units which may be constructed on an annual basis, such adoption or amendment shall contain findings which justify reducing the housing opportunities of the region. The findings shall include all of the following:</u></p> <p><u>(a) A description of the city's or county's appropriate share of the regional need for housing.</u></p> <p><u>(b) A description of the specific housing programs and activities being undertaken by the local jurisdiction to fulfill the requirements of subdivision (c) of Section 65302.</u></p> <p><u>(c) A description of how the public health, safety, and welfare would be promoted by such adoption or amendment.</u></p> <p><u>(d) The fiscal and environmental resources available to the local jurisdiction</u></p>	<u>The City's draft Housing Element and the elements in the City's recently adopted General Plan do not include any provisions which further limits (relative to the current Housing Element and prior General Plan) the development of housing, except such provisions as may be required by state or federal laws.</u>
<u>Housing Element Law (Gov. Code, § 65583, esp. subds. (c)(5), (c)(10).)</u>	<p><u>Section 65583 stipulates that the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.</u></p> <p><u>Subdivision (c)(5) provides that, in order to make</u></p>	<u>Compliance is achieved through preparation and adoption of a Housing Element found to be in substantial compliance with State Housing Element Law by the California Department of Housing and Community Development.</u>

<u>Law</u>	<u>Description</u>	<u>Compliance</u>
	adequate provision for the housing needs of all economic segments of the community, the program shall promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.	

Locally, the City of Lake Forest provides outreach and education to assure community members are well aware of fair housing laws and rights by providing information from the Fair Housing Council of Orange County at City Hall, online, and on request. The City has included Program 22 in its Housing Plan to further strengthen its fair housing outreach capacity in a number of ways, including biennial updates to the City Council, additional advertisements and education on the City's social media platforms, and providing information to schools, libraries and other community facilities for distribution.

Other relevant factors include the City's contract with Families Forward, an affordable housing nonprofit to operate the property as affordable housing, rent the units to income-qualified families as part of its transitional housing services, and to operate the units in full compliance with the lease and successfully provide housing to families threatened with homelessness. Together with its partners, the City of Lake Forest is committed to enforcing fair housing laws and conducting meaningful outreach to provide education and support to community members.

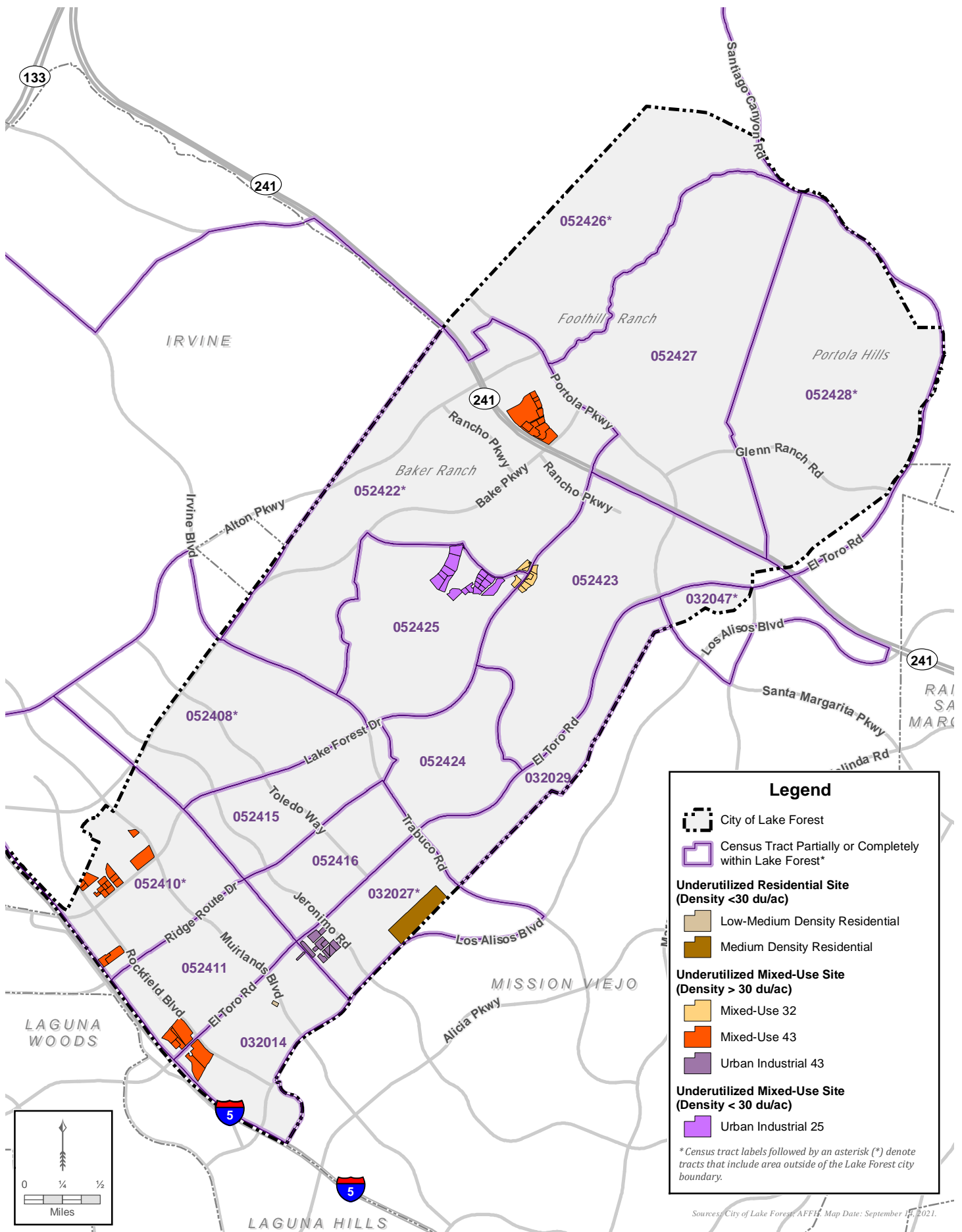


Figure 3: Census Tracts within Lake Forest

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ANALYSIS OF AVAILABLE FEDERAL, STATE, AND LOCAL DATA AND LOCAL KNOWLEDGE

Other Relevant Factors

Lake Forest was incorporated in 1991 and is a relatively new city in South Orange County. Prior to incorporation, residential development took place under the County of Orange. Less than 1,000 units were constructed prior to 1970. Since 1970, development has taken place primarily in Planned Communities, which served as the zoning standards. The Planned Community documents do not include any restrictive covenants or constitute a redlining practice. Since incorporation in 1991, the City approved several zone changes that allowed residential uses to be constructed on land that had formerly been restricted to non-residential development due to the impacts of the former Marine Corps Air Station at El Toro. These rezonings did not create any barriers, redlining practices or restrictive covenants.

Integration and Segregation

To inform priorities, policies, and actions, Lake ~~forest~~ Forest has included an analysis of integration and segregation, including patterns and trends, related to people with protected characteristics. Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. Conversely, integration refers to a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. The following analysis will analyze levels of segregation and integration for race and ethnicity, persons with disabilities, familial status, age, and income to identify the groups in Lake Forest that experience the highest levels of segregation.

Dissimilarity Index

The dissimilarity index is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration of that group. An index score can range in value from 0 percent, indicating complete integration, to 100 percent, indicating complete segregation. An index number between 30 and 60 indicates moderate similarity and community segregation while an index number above 60 is considered to show high similarity and a segregated community.

There are a number of reasons why patterns of racial segregation exist (or don't exist) within a community. Some of these reasons may be institutional (discriminatory lending practices) while others can be cultural (persons of similar backgrounds or lifestyles choosing to live near one another to provide support and familiarity). As such, discussions regarding segregation are complicated and there is not a "one size fits all" approach to addressing patterns of racial segregation.

Figure 4 shows the dissimilarity between each of the identified race and ethnic groups and white population for the City of Lake Forest and the Orange County metropolitan region. The White (not Hispanic or Latino) population within Lake Forest makes up approximately 68% of the City's population. The higher scores indicate higher levels of segregation among those race and ethnic groups. The City does not have any racial or ethnic groups with scores higher than 60 (indicating high similarity and segregation). Several race and ethnic groups (Other Races, American Indian, Native Hawaiian, and Hispanic) exhibit moderate levels of dissimilarity and segregation in Lake Forest (scores between 30 and 60), with most scores indicating moderate levels of segregation on the lower end of the moderate range.

The highest levels of segregation within Lake Forest are Other Races (41.5%) and Native Hawaiian (40.2%), both of which fall within the moderate similarity and segregation range. However, it should be noted that only 102 individuals identified as “Other Race” and only 113 individuals identified as “Native Hawaiian”, and such small populations can indicate a pattern of segregation that is not of significant concern. These scores correlate directly with the percentage of people within that racial or ethnic group that would need to move into a predominately white census tract in order to achieve a more integrated community. For instance, 40.2% of the Native Hawaiian population would need to move into predominately white census tract areas to achieve “perfect” integration.

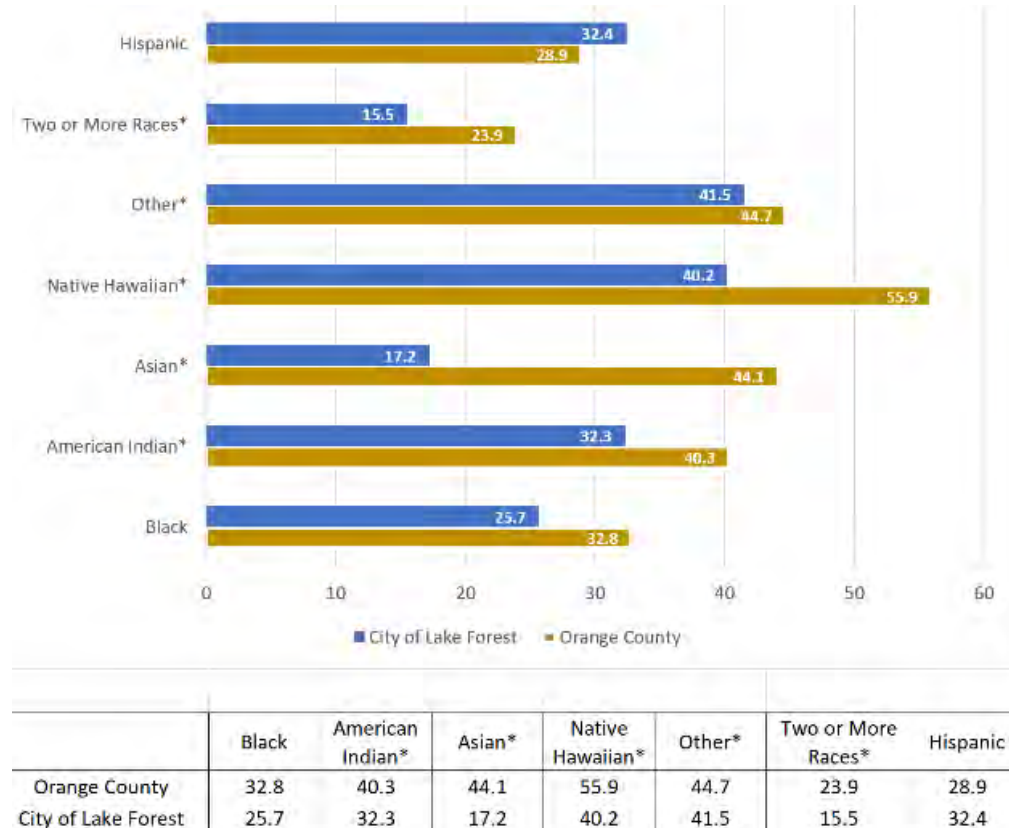
When compared to the Orange County metropolitan region, Lake Forest exhibits lower levels of dissimilarity and segregation than the region as a whole for all race and ethnic groups, except for Hispanic, where the City's index is slightly higher (32.4 in the City and 28.9 in the County). For the categories previously identified as showing moderate levels of segregation in Lake Forest, the Native Hawaiian dissimilarity index is 15 points lower in the City than in the region, while the “Other” category is 3 points lower in the City than the region.

These patterns indicate that in general, Lake Forest is less dissimilar and more integrated for most of the identified racial and ethnic groups, and the community's most dissimilar community (its Native Hawaiian and “Other Race” populations) reflect trends seen throughout the region. This analysis suggested that patterns of segregation at the local level reflect those at the regional level as well, and that partnerships with regional agencies and advocates may be an effective way to address local issues of moderate segregation.

While not evident based on the Dissimilarity Index discussed above, the County AI does identify some patterns of White isolation throughout the County, including in the City of Lake Forest. The County AI points out that white residents have especially high Isolation values in eight Orange County cities (Aliso Viejo, Costa Mesa, Huntington Beach, Laguna Niguel, Lake Forest, Mission Viejo, Rancho Santa Margarita, and San Clemente) and that while some of these cities have lower non-White populations, Lake Forest's Hispanic population suggests that White residents are disproportionately isolated.

A potentially relevant contributing factor to the County AI's identification of potential isolation of White residents in Lake Forest include land use and zoning laws (historic), which may have led to higher concentrations of White residents in areas throughout Lake Forest when compared to the region.

FIGURE 4: DISSIMILARITY INDEX



Source: Census Scope, Social Science Data Analysis Network

* Not Hispanic or Latino

Diversity Index

Tracking the diversity of cities and counties throughout California is crucial to understanding the shifting demographics of race and ethnicity in California and the United States. Esri's Diversity Index captures the racial and ethnic diversity of a geographic area in a single number, from 0 to 100. Scores less than 40 represent lower diversity in the jurisdiction while scores of greater than 85 represent higher diversity. Additionally, scores between 40-55 represent low diversity, 55-70 represent moderate diversity, and 70-85 represent high diversity. As shown in Figure 4, there ~~there~~ generally appears to be higher diversity index scores throughout the City of Lake Forest (compared to its neighbors), with the highest diversity index scores (>85) located along El Toro Road. The lowest diversity index scores include census block groups that border the City of Irvine, which are not very populated and comprised mostly of nonresidential uses. The Citywide average diversity index score is 67.1, which is slightly higher than the County's average diversity index score of 66.7. The City's diversity index is illustrated in Figure 5. As shown in Figure 6, communities in Orange County with higher diversity index scores are somewhat more likely to be located in the more racially and ethnically diverse northern and central portion of the County than they are in the southern and coastal portion of the County.

Mapped Patterns of Integration and Segregation

Patterns of integration and segregation are also considered for people with disabilities, familial status, and income groups. Relying primarily on data available from the US Census, it is possible to map and consider existing patterns which may indicate historical influences and future trends by census tract and census block groups.

As shown in Figure 7, persons with disabilities are present throughout the Lake Forest community, with higher concentrations in areas near transit and major activity centers. with a similar distribution to the adjacent cities of Mission Viejo and Laguna Hills. ~~In Lake Forest,~~ the highest concentration of persons with disabilities exists along both sides of El Toro Road, just east of I-5. This area is composed primarily of single-family detached homes and commercial development with a small population size. Persons with disabilities make up approximately 6.6% of the City's population. The small population may be a contributing factor in the higher percentage of persons reporting disabilities. Housing that accommodates persons with disabilities is more likely to be located near transit and activity centers, as reflected Figure 7. More geographically isolated areas or areas with steep topography, like the City's northern neighborhoods are less suitable for persons with disabilities who may have impaired mobility and difficulty accessing goods and services. The County AI found that across Orange County, concentrations of persons with particular types of disabilities vary widely. In Aliso Viejo, Irvine, Laguna Niguel, Rancho Santa Margarita, San Clemente, Santa Ana, Tustin, and Lake Forest, concentrations of persons with various types of disabilities are generally lower than they are countywide. As shown in Figure 8, communities with higher concentrations of persons with disabilities are somewhat more likely to be located in the more racially and ethnically diverse northern portion of the County than they are in the southern portion of the County. Persons with disabilities account for 8.5% of the Countywide population, which is slightly higher percentage than the City. Based on this analysis, the City finds that there are not significant patterns of segregation impacting persons with disabilities living in Lake Forest.

Lake Forest is also home to a number of female-headed households located throughout the community with limited discernible patterns of segregation, as illustrated on Figure 9. Two census tracts located within the Rancho de los Alisos Planned Community have the highest concentrations of female-headed households in the City, but the ratio is still low. There are no known historic patterns of segregation by familial status, including by household gender, which the City finds as contributing factors to continued segregation in Lake Forest. Figure 9 indicates that female-headed households are located in a variety of census tracts with different incomes, access to opportunities, and resource levels. Female-headed households make up approximately 13.3% of households in the City of Lake Forest, as compared to 13.9% of the total households for the County. As shown in Figure 10, communities in Orange County with higher concentrations of female-headed households are somewhat more likely to be located in the more racially and ethnically diverse northern portion of the County than they are in the southern portion of the County.

The community's older residents, persons 65 years of age or older, tend to be concentrated in a few census tracts in the City's older neighborhoods, specifically along El Toro and Muirlands Boulevard, as shown in Figure 11. These areas generally correspond with the City's older homes, which are some of the more affordable homes in the community and attractive to senior residents. The City continues to find that these options are an important part of the City's housing stock and expects that senior residents will continue to choose to live in these areas as a result of the affordable home options available to them. The City's newer neighborhoods tend to have lower concentrations of seniors; this is due in part to the product type offered (generally larger single-family detached homes) which may not be the preferred housing type of older residents. In Lake Forest, persons 65 years or older comprise of 13.1% of the City's population. In comparison, persons 65 years or older comprise of 13.9% of Orange County's population. As shown in Figure 12, communities in Orange County with higher concentrations of persons 65 years of age or older tend to be concentrated in coastal areas with higher median home prices, as well as the northeastern portion of the County. Central Orange County communities, such as Santa Ana and Tustin have relatively youthful populations, where there are lower median home prices, as well as a larger stock of single-family homes.

Patterns of segregated economic wealth, as indicated by median household income, are not present in Lake Forest, as illustrated on Figure 13. Low and high median household incomes are dispersed throughout the community, with lower and higher levels coexisting in no distinguishable pattern. The two block groups with lower median household incomes are found in two different parts of the City; one of the lower household median income block groups is located near the intersection of Muirlands Boulevard and El Toro Road, where there are several mobile home/manufactured home communities, and the other is located just south of the Civic Center, in a block group with a relatively low population. As shown in Figure 14, communities in Orange County with lower median incomes are somewhat more likely to be located in the more racially and ethnically diverse northern and central portion of the County than they are in the southern and coastal portion of the County. In the southern portion of the County, areas of lower median income are located along the I-5 freeway, where there is a greater concentration of multi-family and more affordable housing. In comparison, the median income in Lake Forest (\$121,747) is higher than the Countywide average of \$98,007.

Findings

The City has considered trends and patterns related to integration and segregation based on racial and ethnic factors, disability, female-headed households, seniors, and median household income. In all cases, there are no distinguishable patterns of segregation, and the community appears to be well-integrated. Moreover, when considering patterns of integration and segregation compared to its neighbors (including the cities of Irvine, Mission Viejo, Laguna Woods, Rancho Santa Margarita, Laguna Hills, and Aliso Viejo – all of which are shown on the above figures), Lake Forest's patterns appear to be consistent with the region. As part of the City's regular participation in the County AI, the City will continue to consider these patterns to determine any changes from current conditions.

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

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

The 2020 AI performed an analysis of R/ECAPs within Orange County. There are four R/ECAPs in Orange County, two of which are found in Santa Ana, two of which are found in Irvine. The two R/ECAPs found in Santa Ana are predominantly Hispanic and found close to the Santa Ana Freeway. The northernmost R/ECAP is located along North Spurgeon Street, while the more southern R/ECAP is found along South Standard Avenue. The R/ECAPs found in Irvine are adjacent to each other and located on the campus of University of California, Irvine, making it likely that they qualify as R/ECAPs due to the high proportions of students. These R/ECAPs have a much more diverse group of residents, with some White, Asian or Pacific Islander, Hispanic and Black residents. However, no R/ECAPs were identified in the City of Lake Forest. Further analysis using the U.S. Department of Housing and Urban Developments RECAP GIS mapping tool confirms that all census tracts within Lake Forest have a RECAP value of 0, indicating that the census tracts within Lake Forest do not meet the defined parameters for a racially or ethnically concentrated area of poverty as defined by HUD.

Comparing Figure 5 to Figure 13, it appears that, generally, areas ranking in the high (70-85) and highest diversity index categories appear to have the lowest median household incomes in the City. Conversely, areas ranking in the low (40-55) and moderate (55-70) diversity index categories appear to have the highest median household incomes in the City. It appears that moderately segregated economic wealth exists within the City based on diversity, as one of the areas of the City with the lowest median household incomes (less than \$30,000 annually) contains a white majority racial concentration while the other contains a Hispanic majority. Figure 15 provides an ethnicity analysis identifying the majority racial concentrations in the City. As shown, the majority of the City contains a white majority racial concentration, with a slim (<10%) to sizeable (10 – 50%) Hispanic majority racial concentration generally located along El Toro Road adjacent to I-5. Overall, it appears that the City does not exhibit significant patterns or trends of greater racial/ethnic concentrations correlating to increased poverty. Figure 16 [provides an ethnicity analysis identifying racial concentrations in the County. Countywide, the northern portion of the County generally has areas with high diversity index scores and lower median incomes, while the southern and coastal portions of the County of lower diversity index scores and higher median incomes.](#)

As discussed in the Findings section, the Housing Plan includes programs to encourage increased diversity and housing opportunities in the City and to provide education related to fair housing rights.

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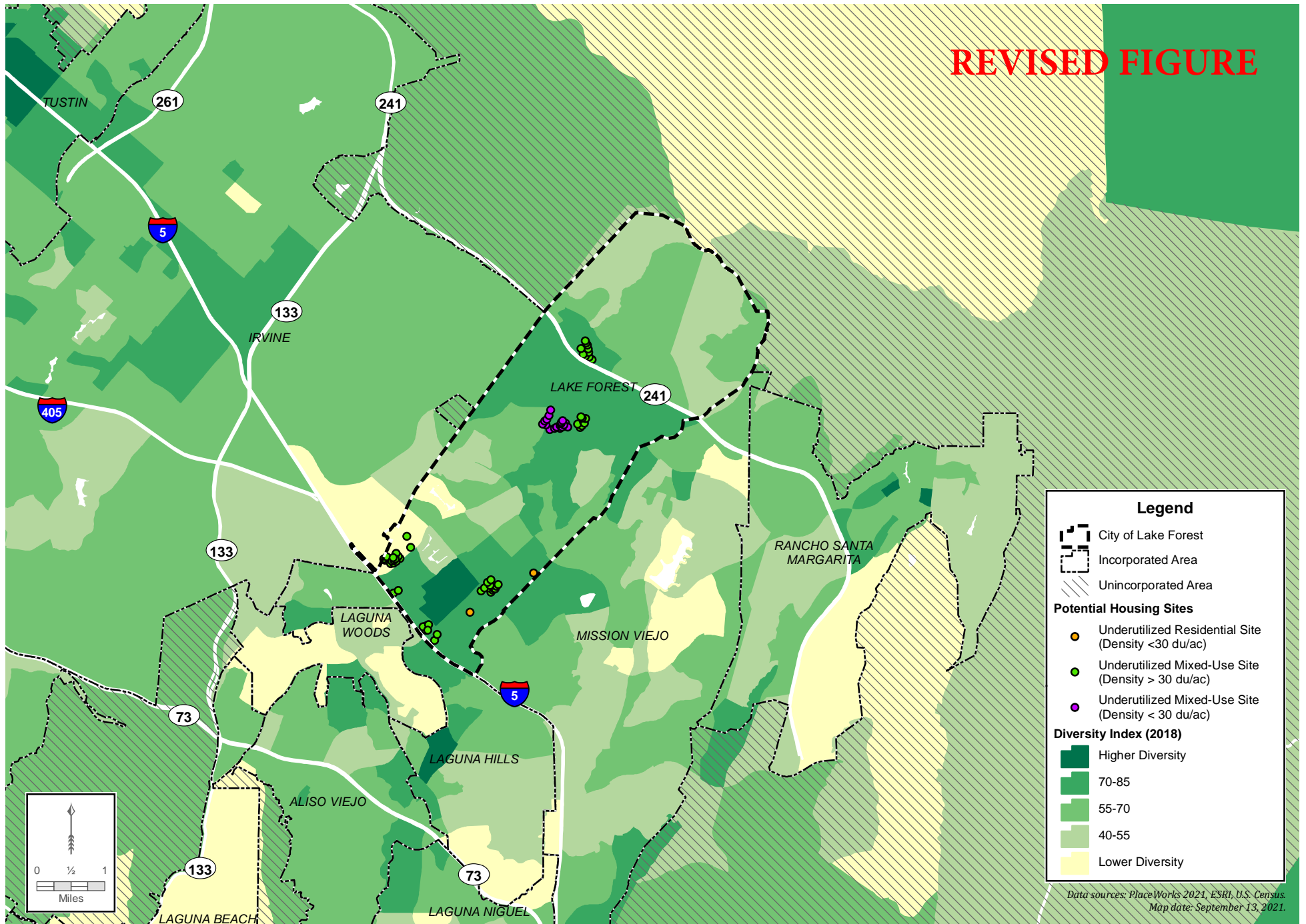


Figure 5: Diversity Index by Census Block Group

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Figure 6: Diversity Index by Census Block Group - Countywide

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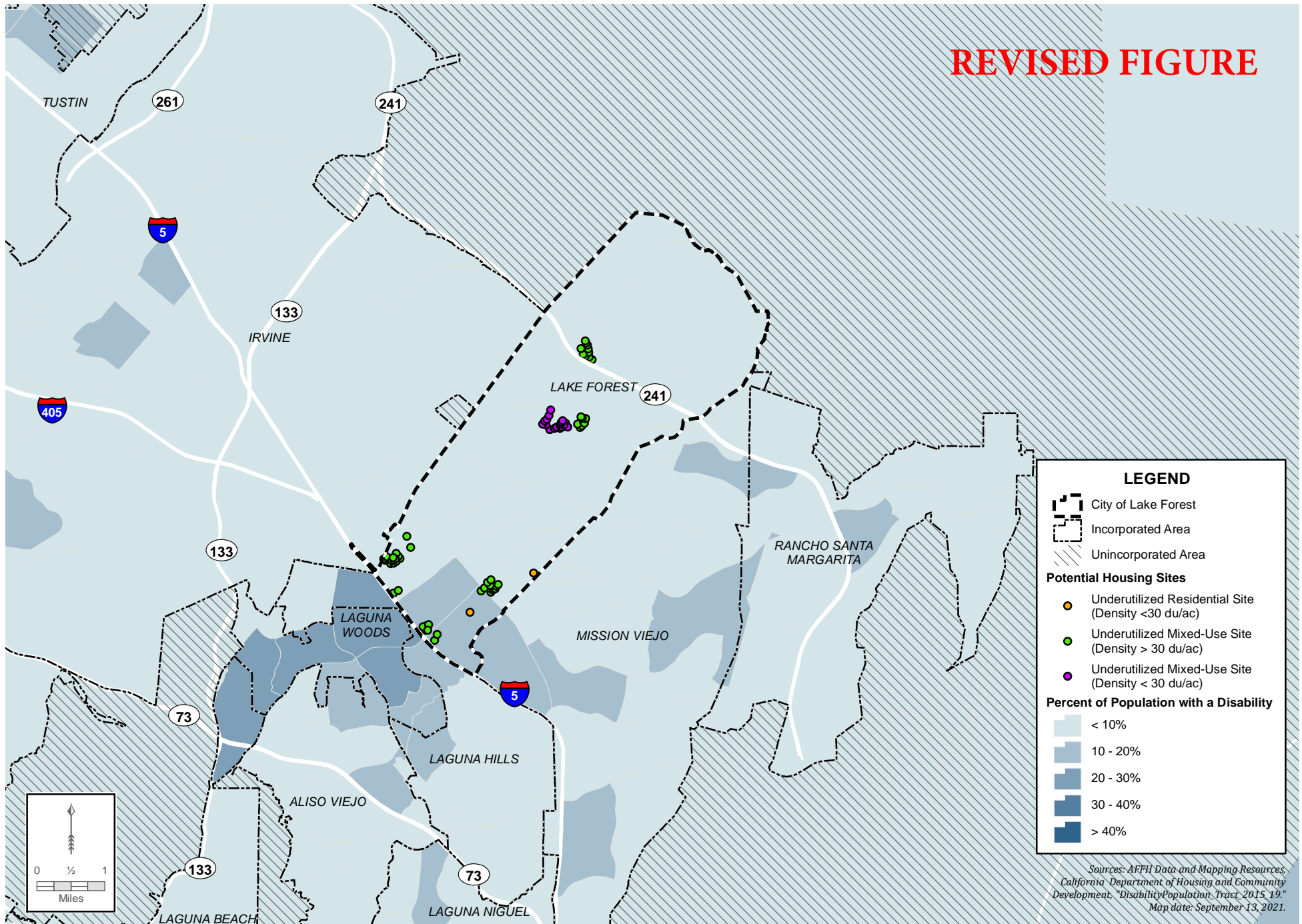


Figure 7: Proportion of Population with Disabilities by Census Tract

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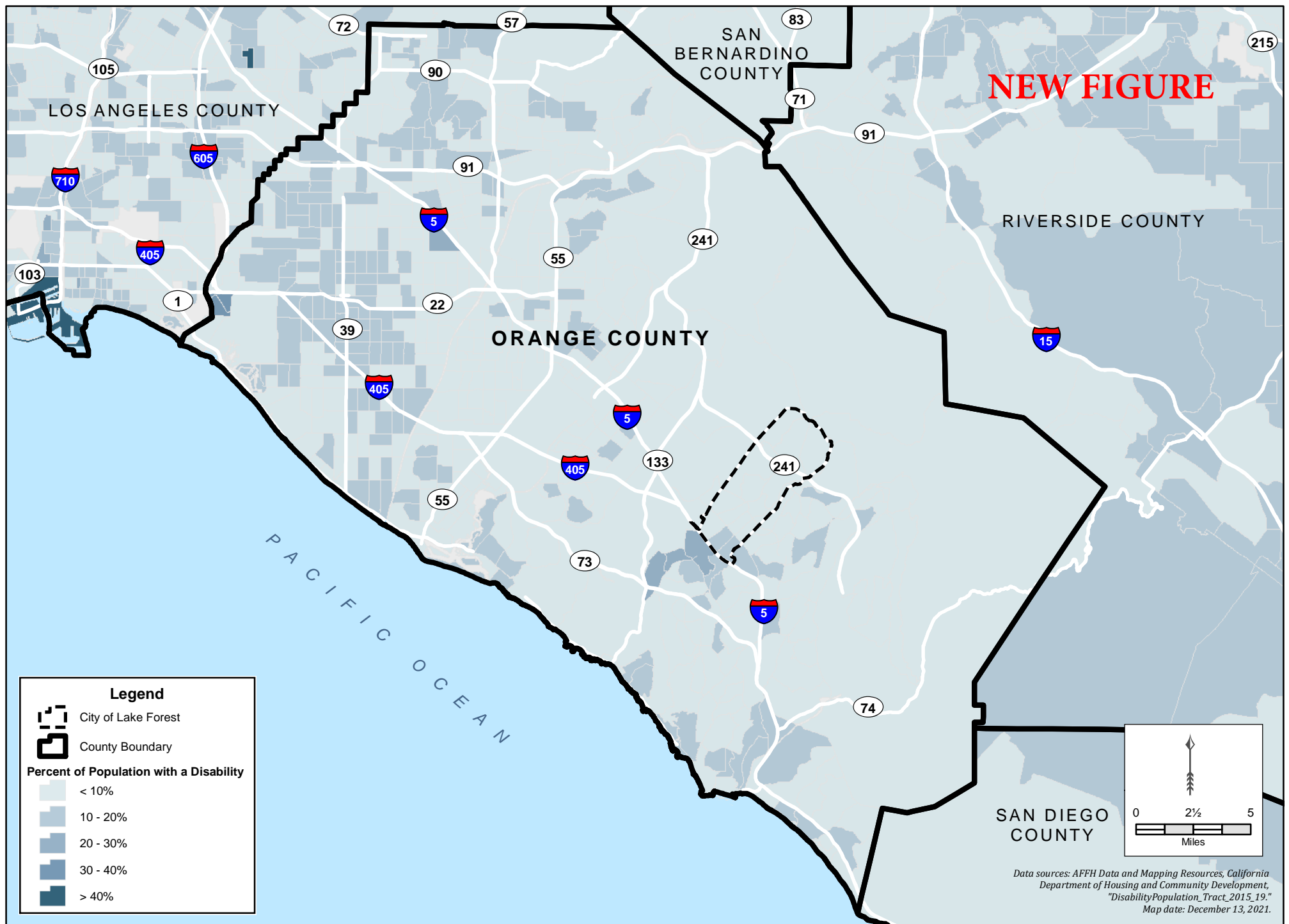


Figure 8: Proportion of Population with Disabilities by Census Tract - Countywide

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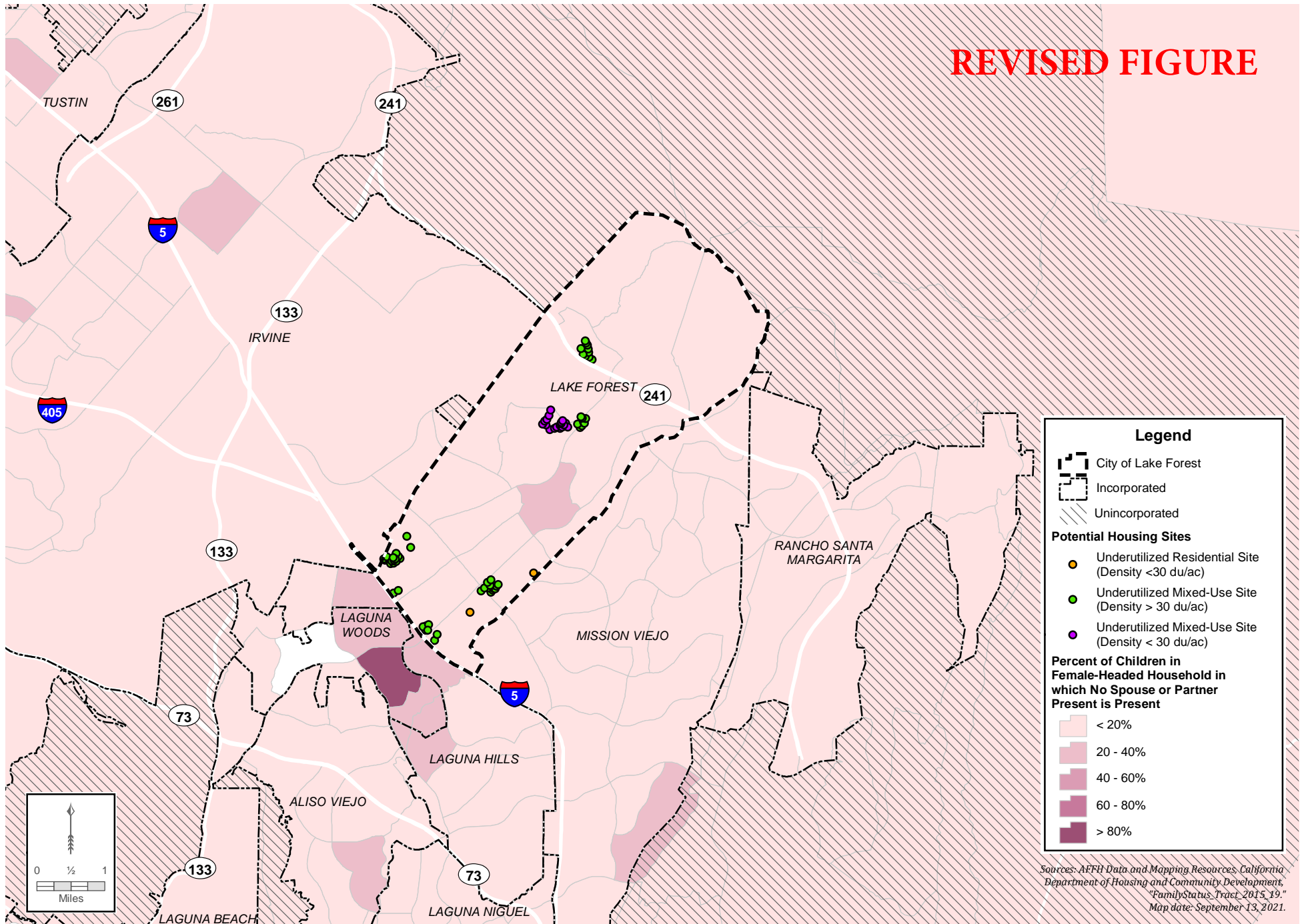


Figure 9: Female-Headed Households by Proportion of Children Present by Census Tract

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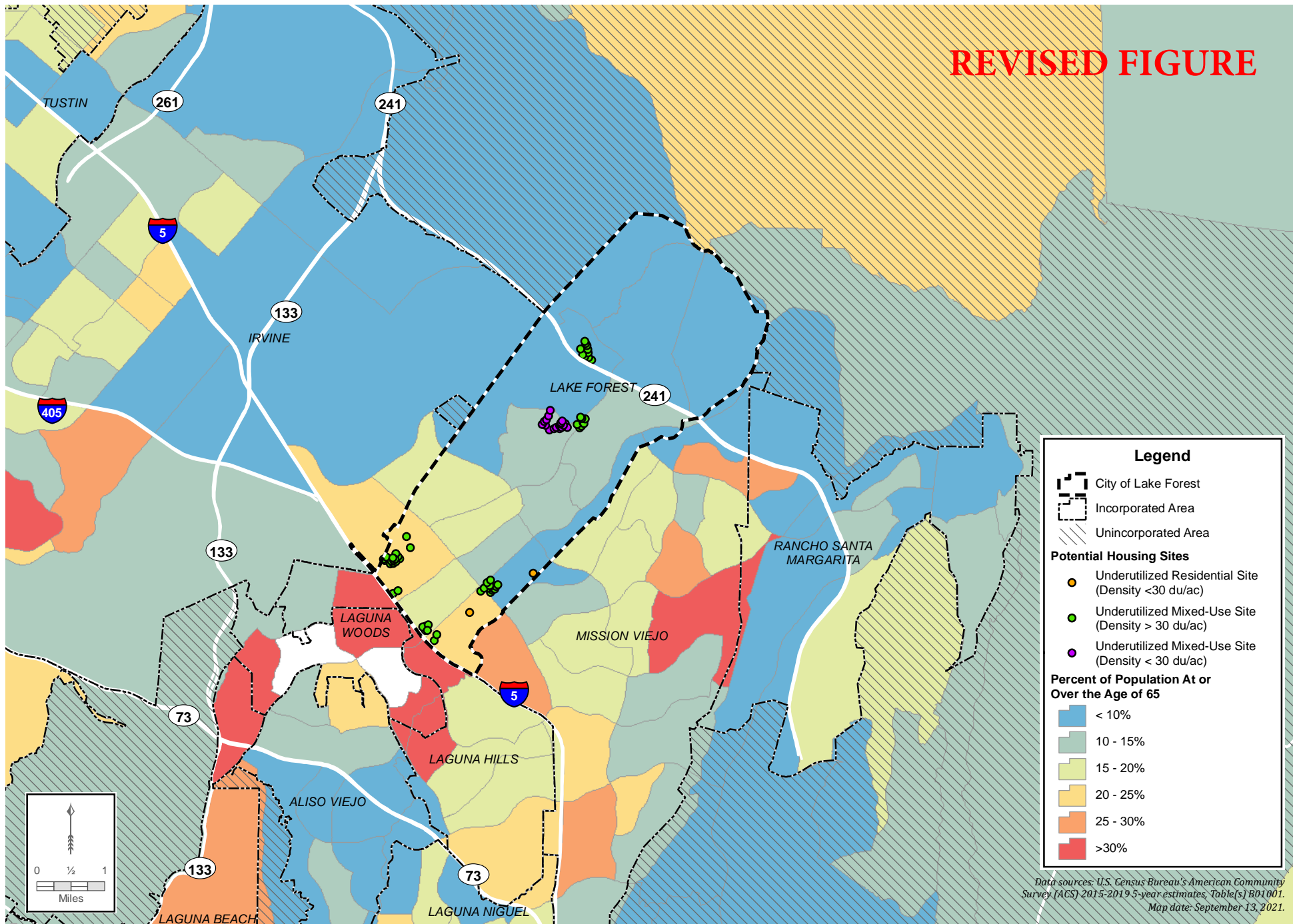


Figure 11: Proportion of Senior Residents by Census Tract

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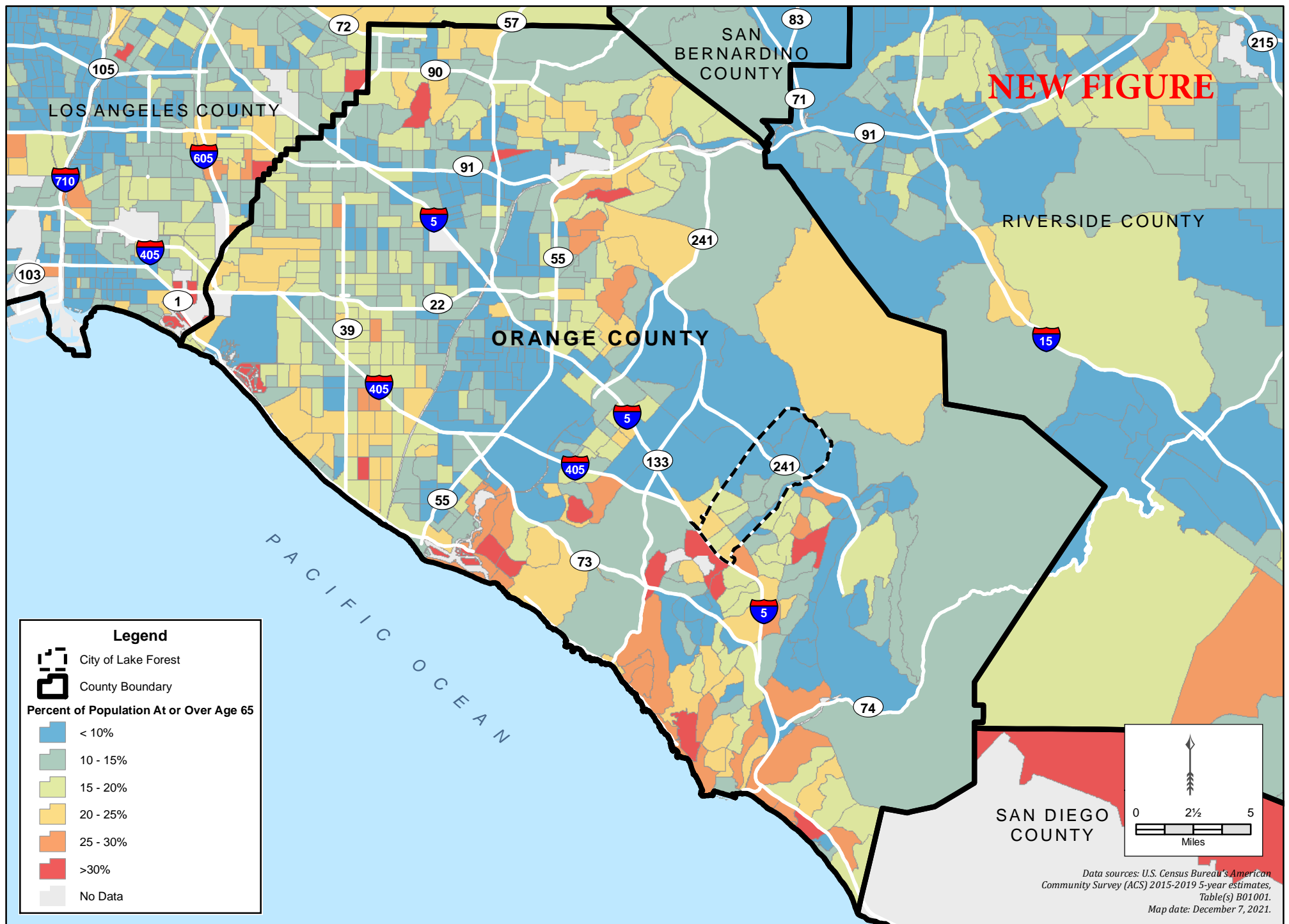


Figure 12: Proportion of Senior Residents by Census Tract - Countywide

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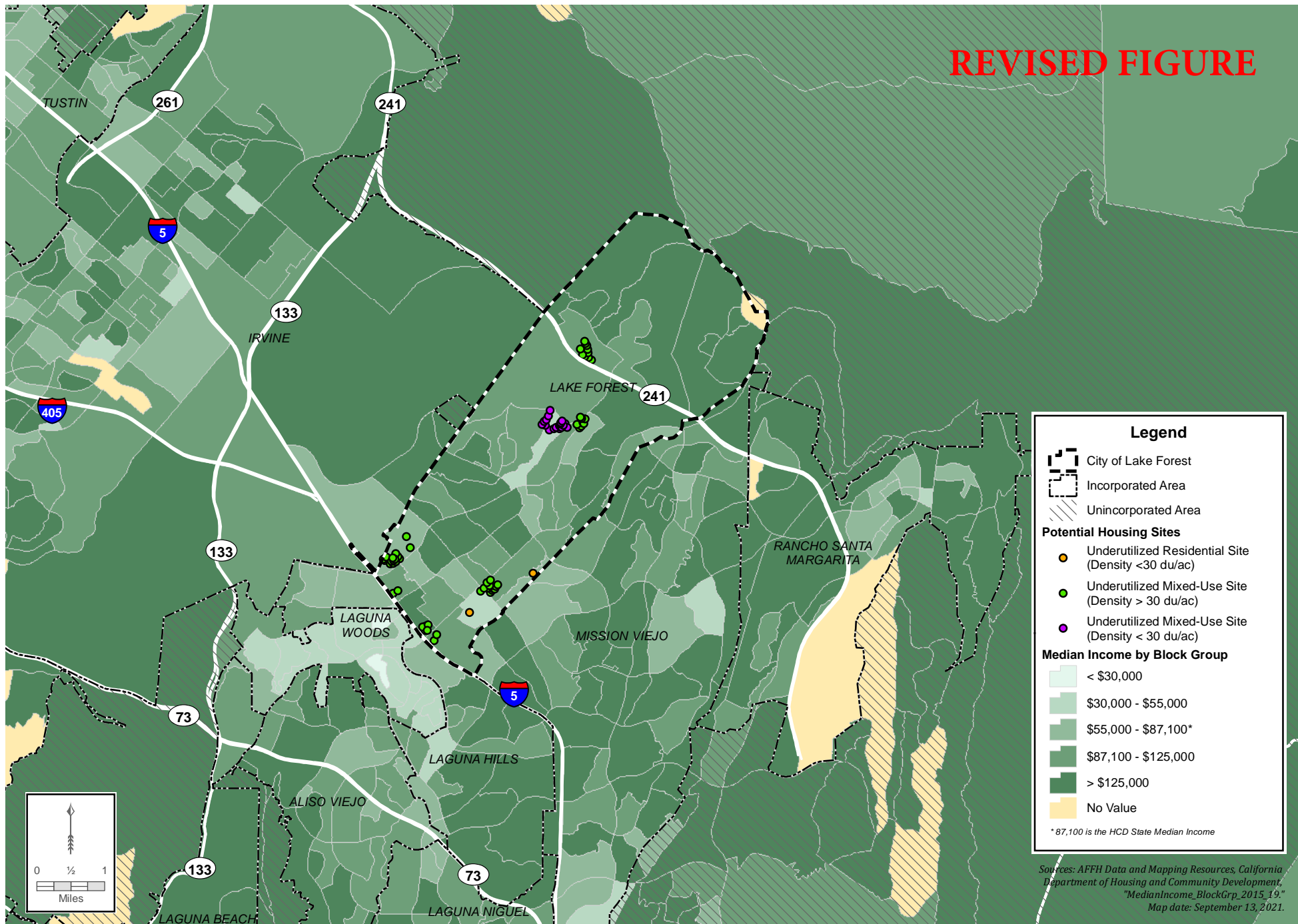


Figure 13: Median Household Income by Block Group

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Figure 14: Median Household Income by Block Group - Countywide

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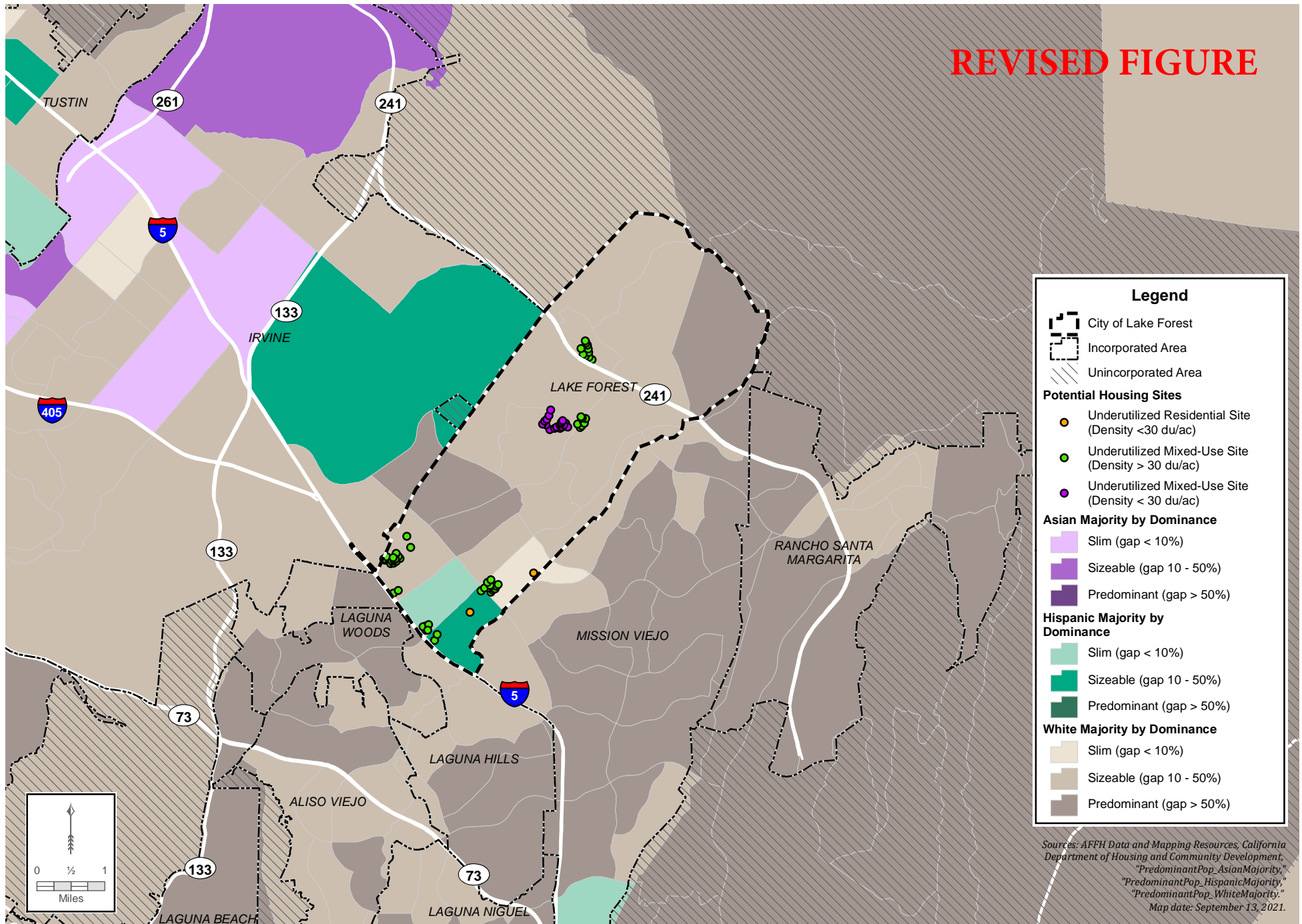


Figure 15: Ethnicity Analysis - Racial Concentrations

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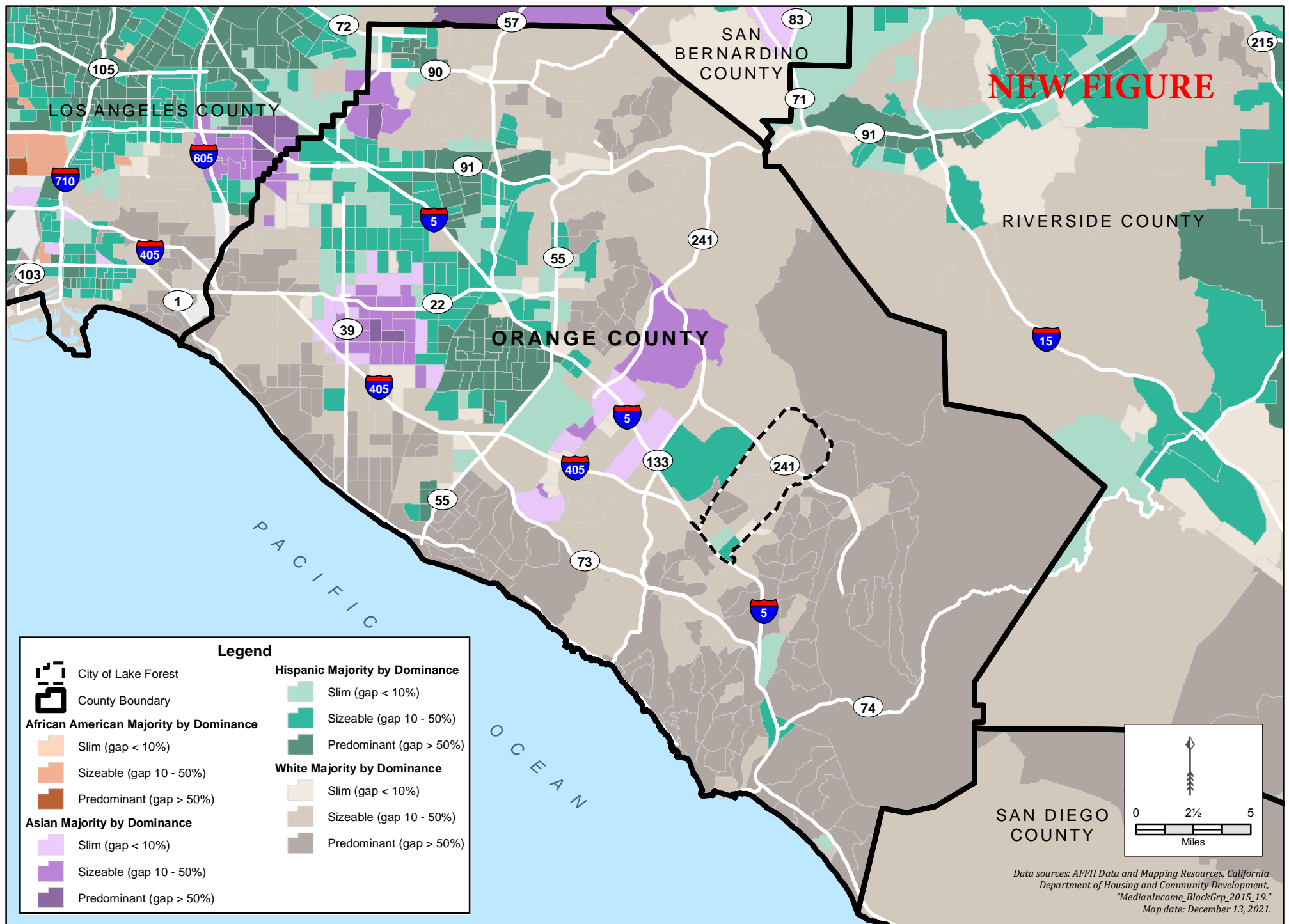


Figure 16: Ethnicity Analysis - Racial Concentrations - Countywide

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Racially/Concentrated Areas of Affluence

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices”. Therefore, both sides of the continuum must be examined. While HCD does not have a standard definition for RCAAs, looking at the percentage of the White population and median household income can provide a good indicator for areas of affluence.

In addition to RECAPs utilized by HUD, scholars at the University of Minnesota Humphrey School of Public Affairs created the Racially Concentrated Areas of Affluence (RCAAs) metric to more fully tell the story of segregation in the United States¹⁰. RCAAs are defined as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016). [Table 69 looks at the median household incomes of white residents in Lake Forest as well as the County as a whole.](#) While the majority of the City contains a white majority racial concentration, there are no census tracts with a median household income of \$125,000 or more. As such, there are no RCAAs located in Lake Forest.

[TABLE 69: REGIONAL OPPORTUNITY INDEX \(ROI\) DATA POINTS](#)

Median Household Income	Lake Forest	Orange County
White households	\$105,661	\$89,504
All households	\$104,449	\$85,398
% of white population	71.8%	65.2%

[Source: American Communities Survey 2014-2018](#)

Disparities in Access to Opportunity

HUD developed the opportunity indicators to help inform communities about disparities in access to opportunity, the scores are based on nationally available data sources and assess resident's access to key opportunity assets in the City. Table 70 provides the index scores (ranging from zero to 100) for the following opportunity indicator indices:

- Low Poverty Index: The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. *The higher the score, the less exposure to poverty in a neighborhood.*
- School Proficiency Index: The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. *The higher the score, the higher the school system quality is in a neighborhood.*
- Labor Market Engagement Index: The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based on the level of employment, labor force participation, and educational attainment in a census tract. *The higher the score, the higher the labor force participation and human capital in a neighborhood.*
- Transit Trips Index: This index is based on estimates of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). *The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.*
- Low Transportation Cost Index: This index is based on estimates of transportation costs for a family that meets the following description: a three-person single-parent family with income at 50% of the median income for renters for the region/CBSA. *The higher the index, the lower the cost of transportation in that*

¹⁰ Goetz, E. G., Damiano, A., & Williams, R. A. 2019. Racially Concentrated Areas of Affluence: A Preliminary Investigation. Cityscape: A Journal of Policy Development and Research, Volume 21(1) [pages 99–124]. Available at: <https://www.huduser.gov/portal/periodicals/cityscpe/vol21num1/ch4.pdf>

neighborhood.

- Jobs Proximity Index: The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. *The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*
- Environmental Health Index: The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. *Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block group.*

Opportunity indicators were obtained for Lake Forest from the HUD Affirmatively Furthering Fair Housing GIS tool. Table 70 identifies the opportunity indicators by race and ethnicity for the total population of Lake Forest.

TABLE 70: OPPORTUNITY INDICATORS BY RACE/ETHNICITY - LAKE FOREST

Race/ Ethnicity	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
White	76.36	72.36	81.64	32.24	69.42	71.33	42.33
Black	73.27	69.65	81.67	32.34	70.96	72.67	42.25
Hispanic	67.04	66.07	76.36	31.35	73.18	70.57	39.94
Asian or Pacific Islander	73.63	72.58	82.39	32.16	69.56	73.34	42.56
Native American	75.43	68.97	79.14	32.03	71.55	69.17	41.59
Total Average	76.36	72.36	81.64	32.24	69.42	71.33	42.33

Source: HUD Affirmatively Furthering Fair Housing GIS Explorer, <https://egis.hud.gov/affht/>

As shown in Table 70, all residents of Lake Forest appear to have relatively high access to opportunity (values over 60), except for transit access and environmental health. Additionally, all residents appear to have fairly similar values. Specifically, all residents had values below 33 in the transit index, which could indicate residents, regardless of race/ethnicity, are not likely to take public transit. Additionally, all residents had values near 40 in the environmental health index, indicating that this area should receive special attention to ensure that the opportunity levels do not dip lower into the lowest quadrant (25 or lower). As such, access to opportunity does not appear to be significantly influenced by race or ethnicity.

The County AI found generally, access to opportunity is highest for non-Hispanic White and Asian/Pacific Islander residents in Orange County. By contrast, access to opportunity is generally lower for Black residents than for non-Hispanic White and Asian residents and access is lowest for Hispanic residents.

Regional Opportunity Index

The UC Davis Center for Regional Change and Rabobank, N.A. partnered to develop the Regional Opportunity Index (ROI) intended to help understand social and economic opportunity in California's communities. The goal of the ROI is to help target resources and policies toward people and places with the greatest need to foster thriving communities. The ROI integrates a variety of data topics, including education, economic development, housing,

mobility, health/environment, and civic life, and “maps” areas of potential investment by identifying specific areas of urgent need and opportunity. The ROI relies on many of the same data sources analyzed in the Housing Element, including the American Community Survey (ACS), the Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES) data, the California Department of Education, the California Department of Public Health, among others (data points are from 2014).

There are two ROI “maps”; the “people” ROI illustrates the relative measure of the **people’s** assets in education, the economy, housing, mobility/transportation, health/environment, and civic life) while the “place” ROI illustrates the relative measure of a **place’s** assets in those same categories. The tool analyzes different specific indicators for each of the 6 data topics, as summarized in Table 71 below.

TABLE 71: REGIONAL OPPORTUNITY INDEX (ROI) DATA POINTS

	People-Based Data Points	Place-Based Data Points
Education	<ul style="list-style-type: none"> Elementary School Truancy English Proficiency Math Proficiency College Educated Adults 	<ul style="list-style-type: none"> High School Discipline rate Teacher Experience UC/CSU Eligible High School Graduation Rate
Economic Development	<ul style="list-style-type: none"> Minimum Basic Income Employment Rate 	<ul style="list-style-type: none"> Bank Accessibility Job Quality Job Growth Job Availability
Housing	<ul style="list-style-type: none"> Housing Cost Burden Homeownership 	<ul style="list-style-type: none"> Housing Affordability Housing Adequacy
Mobility	<ul style="list-style-type: none"> Internet Access Commute Time Vehicle Availability 	<ul style="list-style-type: none"> N/A
Health/Environment	<ul style="list-style-type: none"> Years of Life Lost Births to Teens Infant Health 	<ul style="list-style-type: none"> Air Quality Health Care Availability Access to Supermarket Prenatal Care
Civic Life	<ul style="list-style-type: none"> English Speakers Voting Rates 	<ul style="list-style-type: none"> Neighborhood Stability US Citizenship

As shown in Figure 17 and Figure 19, Lake Forest has a range of opportunity levels throughout the community with slight differences between the relative measure of people-based assets versus place-based assets, with people-based opportunities scoring slightly better than place-based opportunities. All census tracts are shown to have average (yellow) to high (green) levels of **people-based** opportunity, which indicates positive access to opportunities across the six data topics. However, in terms of **place-based** assets, there are two census tracts which indicates a lower level of opportunity (shown in red). The higher and lower levels of opportunity for these two census tracts, by indicator, are summarized in Table 72.

TABLE 72: PLACE-BASED REGIONAL OPPORTUNITY INDEX (ROI) LOW OPPORTUNITY CENSUS TRACTS

Census Tract (Place)	Opportunity Level	Average or Higher Opportunities	Lower Opportunities
06059052423	Lowest Opportunity	<ul style="list-style-type: none"> Economy Education 	<ul style="list-style-type: none"> Health/Environment Civic Life Housing
06059052428	Lowest Opportunity	<ul style="list-style-type: none"> Education Civic Life Housing 	<ul style="list-style-type: none"> Health/Environment Economy

For census tract 06059052423, which is south of SR-241 and along El Toro Road, there appears to be limited opportunities related to civic life, health/environment, and housing. Upon a deeper dive into the data, the most pressing health/environment issue is limited access to a supermarket, which can help inform the City's land use planning decisions. In regards to civic life, the concerns relate to neighborhood stability. This census tract also has low levels of housing affordability. For census tract 06059052428, located along SR-241 and El Toro Road, there appears to be limited opportunities related to health/environment and the economy. The most pressing health/environment issue is limited access to a supermarket and health care. In regard to the economy, the concerns are bank accessibility and job availability. This census tract is predominately residential and surrounded by residential uses, which explains the indicators regarding access to goods and services.

In Orange County, areas with lower people-based and place-based opportunities are concentrated in the central and northern portion of the County, including the cities of Santa Ana and Garden Grove, as illustrated in Figure 18 and Figure 20. For the lowest people-based opportunity census tracts in the County, there appears to be limited opportunities related to housing. For the lowest place-based opportunity census tracts in the County, there are a variety of limited opportunities depending on the location related to civic life, health/environment, housing, economy, and education.

In order to better understand access to opportunities for protected classes (persons with disabilities, race, familial status), this section compares potential patterns of isolation and segregation presented in the prior section with the Regional Opportunity Index (people and place) discussed here.

As shown in Figure 7 and previously discussed, persons with disabilities are located throughout the community. The census tracts with the most significant percentage of its population reporting a disability are located in an area of moderate to high levels of people-based opportunities and high levels of place-based opportunities. There does not seem to be a correlation between where persons with disabilities are located and lower levels of opportunity.

As shown in Figure 9 and previously discussed, female-headed households are prevalent throughout the community and generally represent 20% of households in all census tracts. The census tract with the highest number of female-headed households is located in an area where access to people-based opportunities is moderate and access to place-based opportunities is high. Given that there is no discernable pattern of segregation associated with female-headed households, there does not seem to be a relationship between where female-headed households are more likely to be located and specific resource levels.

As shown in Figure 11 and previously discussed, there are no discernible patterns of isolation or segregation based on age. The census tracts with the highest levels of senior residents are located along the City's southern boundary, which includes the oldest areas of the City. These census tracts are identified as having moderate to high people-based opportunity levels and the highest place-based opportunity levels. In general, the other census tracts showing higher-than-average levels of senior residents also have moderate or better people- and place-based opportunities.

Concentrations of the City's Asian, Hispanic and nonwhite populations are shown in Figure 15. In addition to showing patterns of racial concentration, this Figure, like the others presented here, also identifies candidate housing sites in relation to patterns of racial concentration and illustrate that access to people- and place-based opportunities is most likely to be correlated with patterns of racial concentration versus the other classes discussed earlier in this section. The lowest levels of access to people-based opportunity are consistent with those census tracts with the highest concentration of Hispanic residents. However, while the vast majority of Lake Forest exhibits moderate or better levels of access to place-based opportunity, the two census tracts with lower-levels of opportunity (located in the City's northern area) are predominantly White. So, while this pattern warrants further study and could necessitate focused investment, the pattern is not consistent and areas with high concentrations of Hispanic and nonwhite residents still have access to a variety of resources, consistent with the patterns seen citywide.

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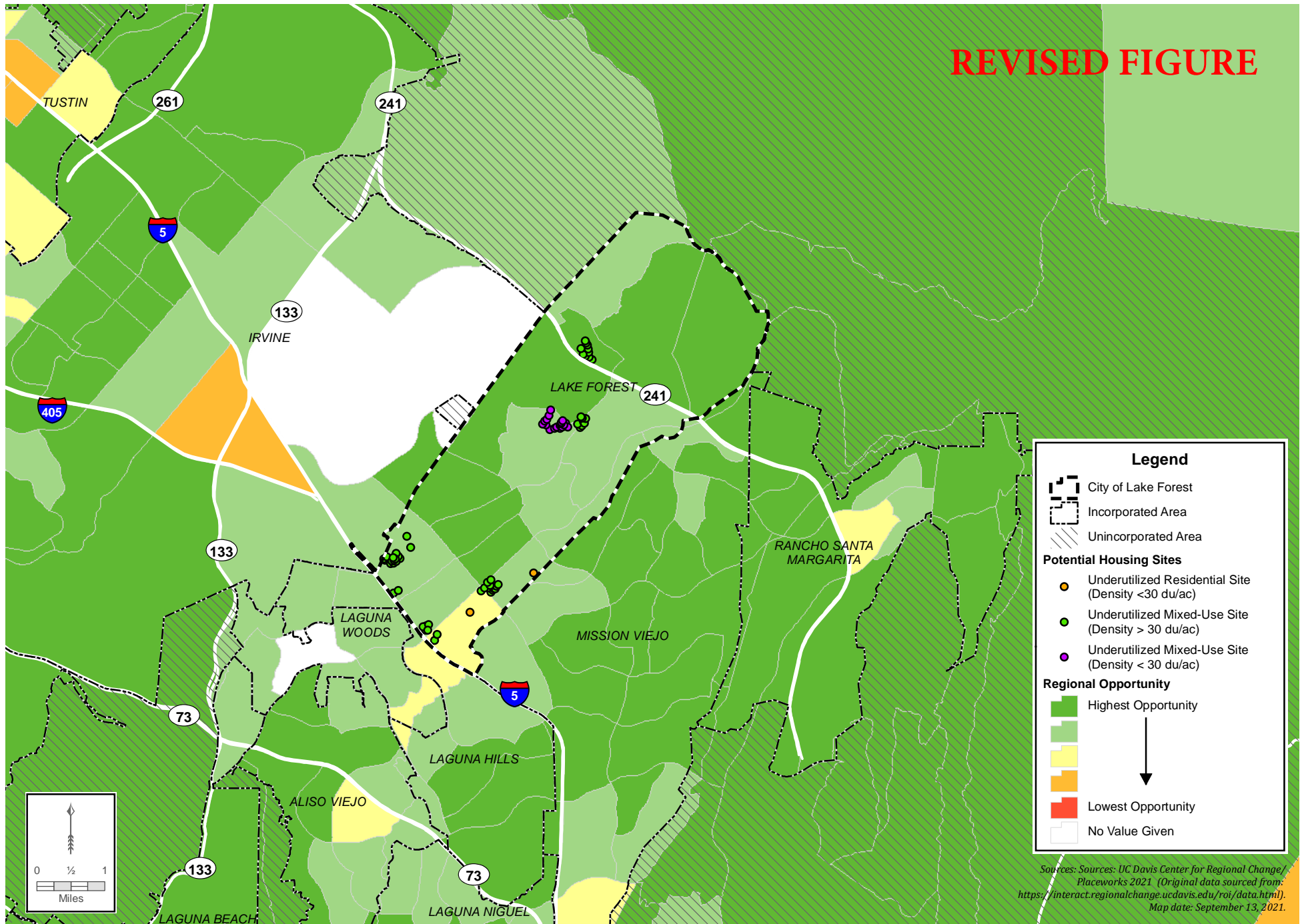


Figure 17: People-Based Opportunities by Census Tract

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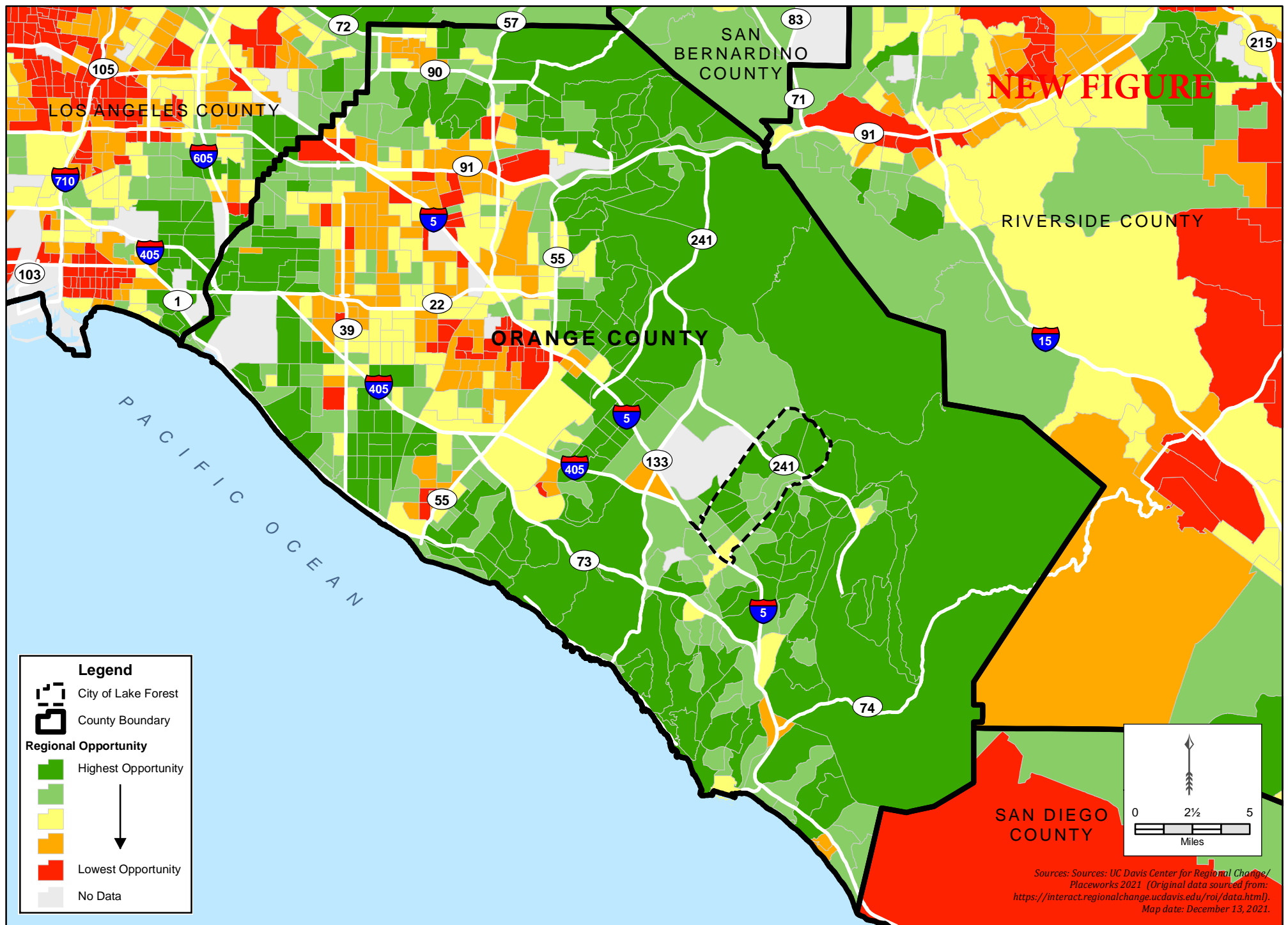


Figure 18: People-Based Opportunities by Census Tract - Countywide

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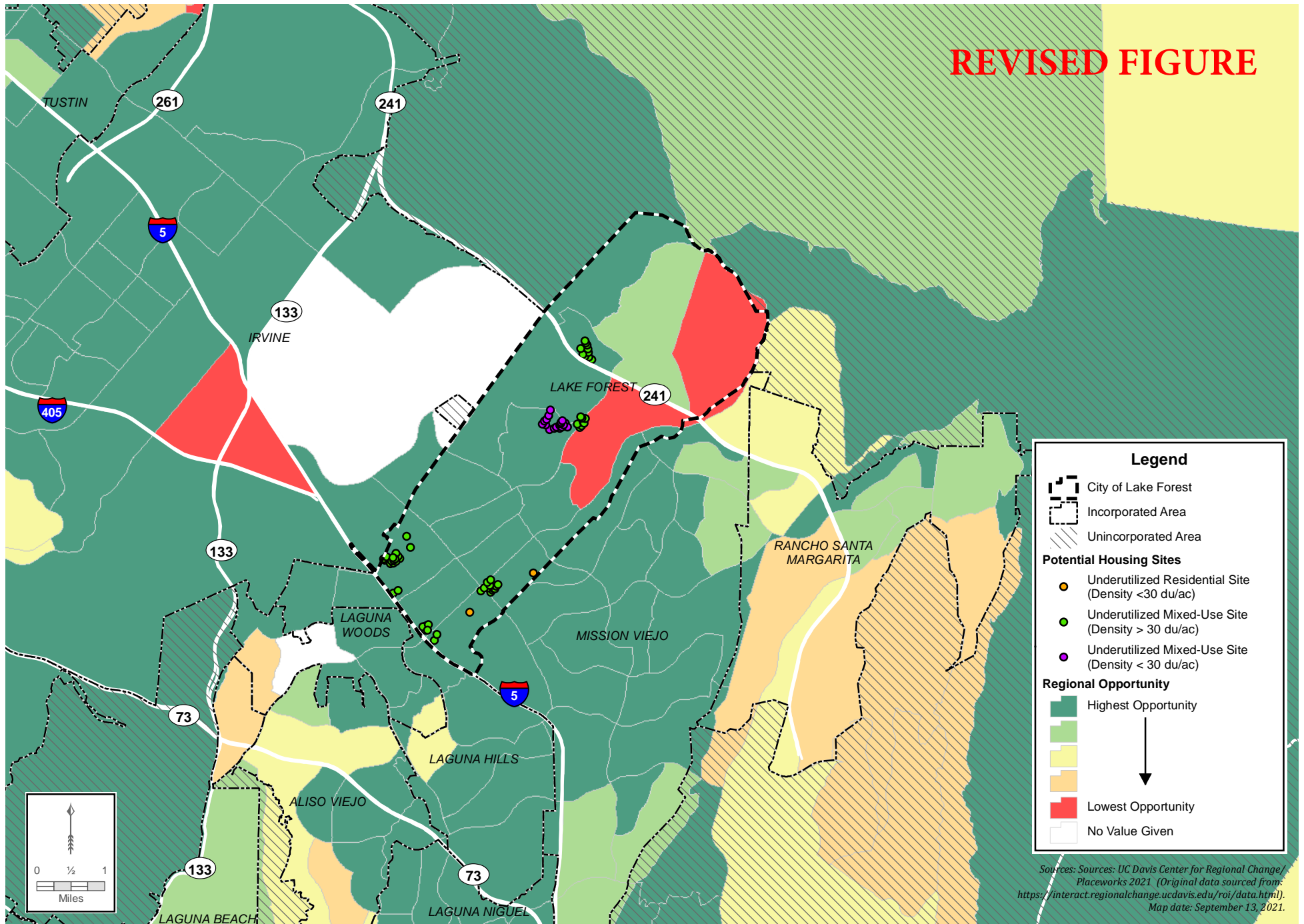


Figure 19: Place-Based Opportunities by Census Tract

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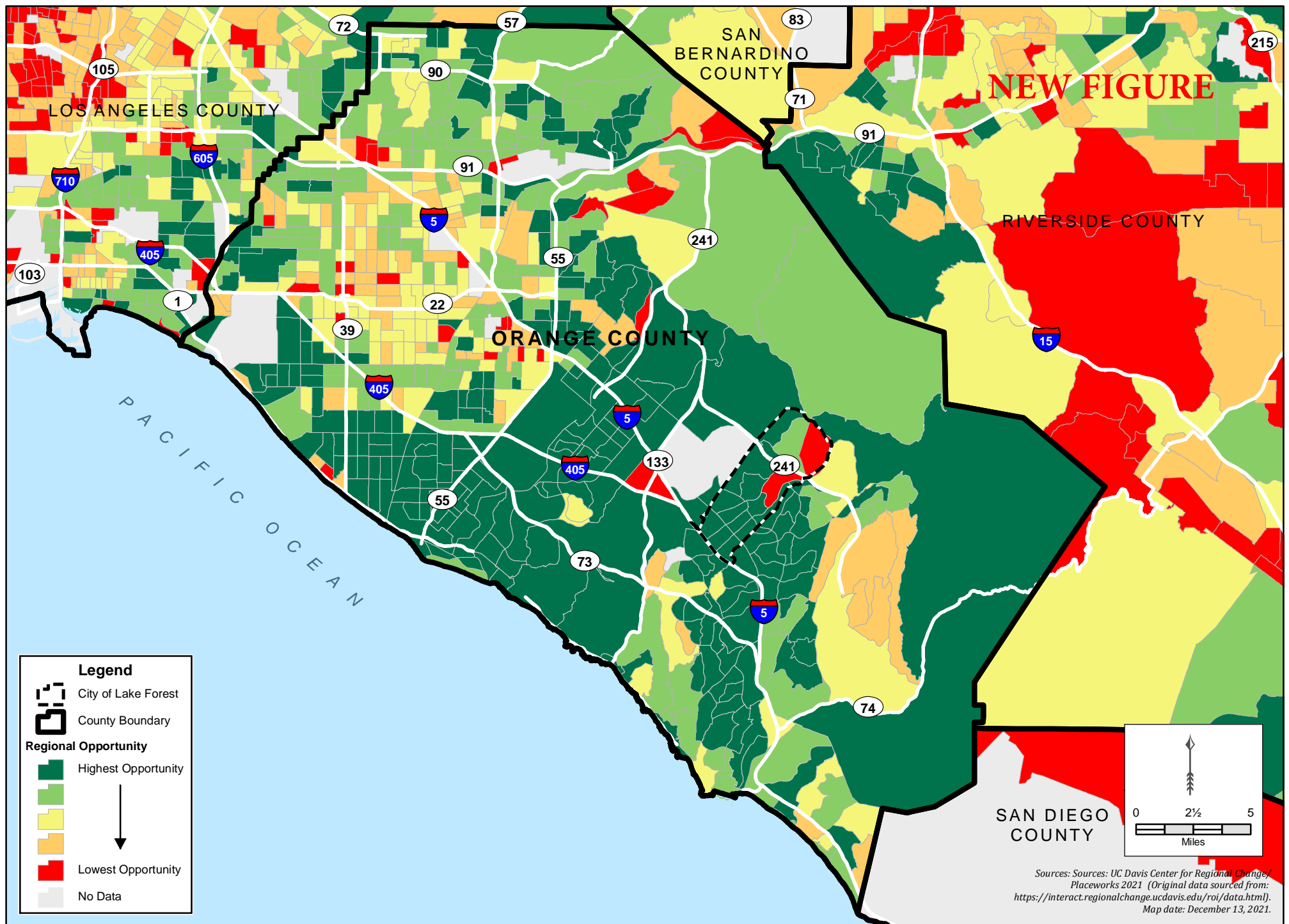


Figure 20: Place-Based Opportunities by Census Tract - Countywide

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2021 TCAC/HCD Opportunity Area Map

Additionally, the Department of Housing and Community Development together with the California Tax Credit Allocation Committee established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD). The Task force developed the 2021 TCAC/HCD Opportunity Area Maps to understand how public and private resources are spatially distributed. The Task force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

According to the Task Force's methodology, the tool allocates the 20 percent of the tracts in each region with the highest relative index scores to the "Highest Resource" designation and the next 20 percent to the "High Resource" designation. Each region then ends up with 40 percent of its total tracts as "Highest" or "High" resource. These two categories are intended to help State decision-makers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice. The remaining tracts are then evenly divided into "Low Resources" and "Moderate Resource". Table 70 identifies the resource levels by census tract and the corresponding scores for economic, education, and environmental indicator scores. As shown in Table 73 and Figure 21, approximately half of Lake Forest is classified as "High" or "Highest" resource, a quarter is classified as "Moderate" resource, and the remaining quarter (four census tracts) is classified as "Low" resource.

TABLE 73: LAKE FOREST OPPORTUNITY RESOURCE LEVELS BY CENSUS TRACTS

Census Tract (Place)	Resource Level	Economic Score	Education Score	Environmental Score
052410*	Low	18	36	1
052411	Low	12	34	9
032014	Low	9	34	14
052408*	Low	68	53	1
052415	Moderate	68	53	58
052416	Moderate	56	49	51
032027*	Moderate	36	42	65
052422*	High	80	63	51
052425	High	51	59	70
052424	Moderate	35	59	59
032029	Moderate	49	44	65
052423	Moderate	55	54	61
032047*	High	49	68	80
052426*	High	67	87	21
052428*	Highest	82	74	64

Source: 2021 TCAC/HCD Opportunity Map, <https://belonging.berkeley.edu/2021-tcac-opportunity-map>.

* Census tracts labels followed by an asterisk (*) denote tracts that include area outside the Lake Forest city boundary.

The four "low" resource level census tracts are all located adjacent to, or near the I-5 freeway. Table 74 shows a more detailed look of the four low resource census tracts

TABLE 74: LOW RESOURCE CENSUS TRACT ANALYSIS

Census Tract (Place)	Census Tract 052410	Census Tract 052411	Census Tract 032014	Census Tract 052408
Race/Ethnicity				
White	50%	37%	35%	67%
Black	2%	2%	2%	0%
Asian	22%	17%	11%	17%
Hispanic	22%	39%	46%	14%
% of Population in Poverty	11.4%	14.9%	18.9%	1.8%
% of Population that is Disabled	8.3%	10.6%	15.7%	5.4%
% of Households in Renter- Occupied Housing Units	32.9%	20.3%	31.6%	13.5%
Overcrowding	3.66%	9.53%	17.15%	2.11%
Overpayment				
Renters	54.2%	56.0%	73.4%	35.6%
Owners	42.7%	31.4%	18.0%	11.6%

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resources.

The County AI found that Countywide, there are disparities across racial/ethnic groups in access to educational opportunities as measured by the index. Across all tracts in Orange County, non-Hispanic White residents exhibit the highest exposure to educational opportunities (index score of 59) and non-Hispanic Asian residents second highest (index score of 53). Hispanic residents have the lowest access to these opportunities (31), with non-Hispanic Black residents in between (46). Countywide, there are disparities across racial/ethnic groups in access to environmental opportunities, measured as lower exposure to and effects from pollution. Jurisdictions with the highest environmental opportunity appear to have primarily large concentrations of non-Hispanic White and Asian/Pacific Islander residents. In Orange County there are significant disparities in access to economic opportunity, with Hispanic residents having the lowest access to economic opportunity of all racial and ethnic groups in Orange County. Economic Opportunity Index scores are generally lower in North Orange County than in South Orange County. Countywide TCAC/HCD Opportunity levels are shown in Figure 22.

The County AI found that Lake Forest, like other jurisdictions in the County, have relatively large disparities by projected class groups and Hispanic residents have significantly lower access to economic opportunity than other racial/ethnic groups. Table 75 shows the opportunity index values for the City of Lake Forest.

TABLE 75: CITYWIDE OPPORTUNITY INDEX VALUES

Population	Economic Score	Environmental Score	Educational Score	Low Transportation Cost Score	Transit Score
Total Population					
White, Non-Hispanic	52	55	61	32	3
Black, Non-Hispanic	49	55	61	34	3
Hispanic	40	44	53	36	3
Asian or Pacific Islander, Non- Hispanic	52	54	60	32	3
Native American, Non-Hispanic	46	54	59	34	3
Population below federal poverty line					
White, Non-Hispanic	43	48	65	35	3
Black, Non-Hispanic	59	62	49	29	3
Hispanic	24	18	43	33	3
Asian or Pacific Islander, Non- Hispanic	35	37	52	39	4
Native American, Non-Hispanic	6	10	40	50	3

Source: Orange County Analysis of Impediments to Fair Housing Choice, May 2020.

Findings

Overall, it appears that residents in Lake Forest have varying levels of access to opportunities, and access to opportunity is not correlated to the location of special groups, like female-headed households, seniors, or persons with disabilities. While there is some minor correlation between access to opportunities and racial/ethnic composition in the southern areas of the City near El Toro/I-5, there are other areas of the City with lower levels of access to opportunity where the residents are predominately white. Access to opportunity appears to be consistent and equitable across the community total population, however inequities exist in populations below the federal poverty line, with Hispanic residents below the federal poverty line have less access to opportunities than other groups. Program 24, Neighborhood Improvement Task Force, has been added to address this Finding.

Discussion of Disproportionate Housing Needs

Across Orange County, many residents face high rates of housing problems, severe housing problems, and severe housing cost burden. The County AI found that 27.1% of households have a severe housing problem, which are lack of kitchen or plumbing, more than one person per room, or cost burden greater than 50%. Hispanic households are most likely to have a severe housing problem (44.5% of households). In comparison, the County AI found that 19.9% of households in Lake Forest have a severe housing problem, with 42.4% of Hispanic households having a severe housing problem. Hispanic residents face severe housing problems at a higher than average in Lake Forest compared to the County. Overall, across the County, Black and Hispanic residents are more likely to face all of these housing problems, with varying rates across different jurisdictions. Housing problems occur more frequently in more populated areas of the County. The County AI found that while housing problems are generally evenly dispersed throughout the County, however, Lake Forest has higher percentages of households with housing problems in areas with higher numbers of Hispanic residents.

The analysis of disproportionate housing needs within Lake Forest evaluated existing housing need, needs of the future housing population, and units within the community at-risk of converting to market-rate (of which there are 11 units).

Future Growth Need

The City's future growth need is based on the RHNA, which allocates production of 956 very-low and 543 low-income units to the City for the 2021-2029 planning period. Figure 2 shows that both existing and proposed affordable units are well dispersed throughout the community and do not present a geographic barrier to obtaining affordable housing. Appendix A of this Housing Element shows the City's ability to meet its 2021-2029 RHNA need at all income levels. This demonstrates the City's ability to accommodate the anticipated future affordable housing needs of the community.

Existing Need

As described earlier in this Background Report, the City has a history of working with affordable housing developers to help facilitate the development of housing for lower-income households. Lake Forest has 202 rent-restricted units, representing approximately 1% of the City's housing stock. The City actively works with affordable housing developers to identify and evaluate potential sites and to expand opportunities for lower-income households throughout the City. Lake Forest continues to encourage development of 15% affordable housing in conjunction with development of market rate housing.

Findings

"Disproportionate housing needs" generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. Based on input from the community and the County AI, the most disproportionate housing needs in Lake Forest includes rehabilitation of the existing housing stock and increased variety of housing types at affordable prices, including housing for lower income households and larger households.

Displacement Risk

As previously discussed, there are 8 deed-restricted affordable units currently at-risk of converting to market-rate within the next 30 years. The vast majority of the City's affordable housing stock was constructed in conjunction with the development of the City's Opportunities Study areas, and these units have an expiration date well beyond the planning period. The City also has a number of units which are affordable to lower-income families but are not deed-restricted. As described earlier in this Background Report, the City plans to accommodate the vast majority of its 2021-2029 RHNA allocation on parcels designated for mixed-use development, with a focus on new development along the City's major transportation corridors and near activity centers, which have good access to transportation facilities, amenities, and infrastructure. Moreover, given that the majority of new residential development will happen in areas envisioned to support mixed-use development, it is expected that residential uses will be developed alongside complementary commercial and civic uses, which will help facilitate bringing jobs and housing closer together. There are two underdeveloped residential sites identified as meeting a portion of the City's moderate- and above-moderate income units; based on the net addition of units at these locations (which currently provide units affordable to moderate-income households), there is no a significant displacement risk associated with the City's current affordable housing stock as a result of new development.

The Urban Displacement Project¹¹ identifies displacement risk throughout Orange County. The eastern, southern and coastal portions of the County are primarily exclusive or at risk of becoming exclusive. Approximately half of the census tracts in the City are considered "Stable/Advanced Exclusive," a little less than half of the census tracts are considered "At Risk for Becoming Exclusive," and one census tract is considered "Stable Moderate/Mixed Income." Additionally, there are three census tracts in the City that according to the AFFH Data and Mapping Resources Map, are considered "Sensitive Communities" where residents may be particularly vulnerable to displacement in the event of increased redevelopment and shifts in housing costs. This includes census tracts 06059052411 and 06059032014 located adjacent to the I-5 freeway and census tract 06059052425, located in central Lake Forest between Lake Forest Drive and Trabuco Road. Census tract 06059032014 includes a large mobile home park that would be at risk for redevelopment. There are affordable housing opportunity sites located in all three census tracts, that would potentially displace existing residents due to redevelopment.

The City recognizes that even though it has identified sufficient land to accommodate its RHNA allocation at all income levels, there is still the potential for economic displacement because of new development and investment. This "knock-on" effect can occur at any time, and it can be challenging for the City to predict market changes and development patterns which have the potential to impact rental rates and sales prices for housing available in the marketplace. To date, the City has no evidence that new development (affordable or market-rate) has resulted in economic displacement. However, the City recognizes that economic displacement might occur in the future and has developed Program 23 to study and address potential issues related to displacement.

The City has also considered the risk of displacement specifically for protected classes, including persons with disabilities, female-headed households, seniors, and nonwhite residents (as discussed previously throughout this Background Report). The highest levels of persons with disabilities, female-headed, and lower income households are not located in areas where residential development is planned, and the risk of displacement to these groups (like to the City's lower-income residents) is low. However, some future housing sites are located in areas with high levels of senior residents, and these groups appear to be more vulnerable to potential future displacement. As discussed above, Program 23 has been included in the City's Housing Plan to study and address issues related to future displacement, and the City remains committed to maintaining its existing affordable housing stock, which includes affordable units throughout the City, including in census tracts with high levels of senior residents.

To the extent that future development occurs in areas where there is existing housing, all housing must be replaced according to SB 330's replacement housing provisions (Government Code Section 66300). SB 330 also provides relocation payments to existing low-income tenants. The State has also adopted "just cause" eviction provisions and statewide rent control to protect tenants from displacement.

Findings

The City is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying displacement. Program 22 detail efforts the City will take to engage these communities during the planning period.

¹¹ Urban Displacement Project, www.urbandisplacement.org/los-angeles/los-angeles-gentrification-and-displacement, December 2021.

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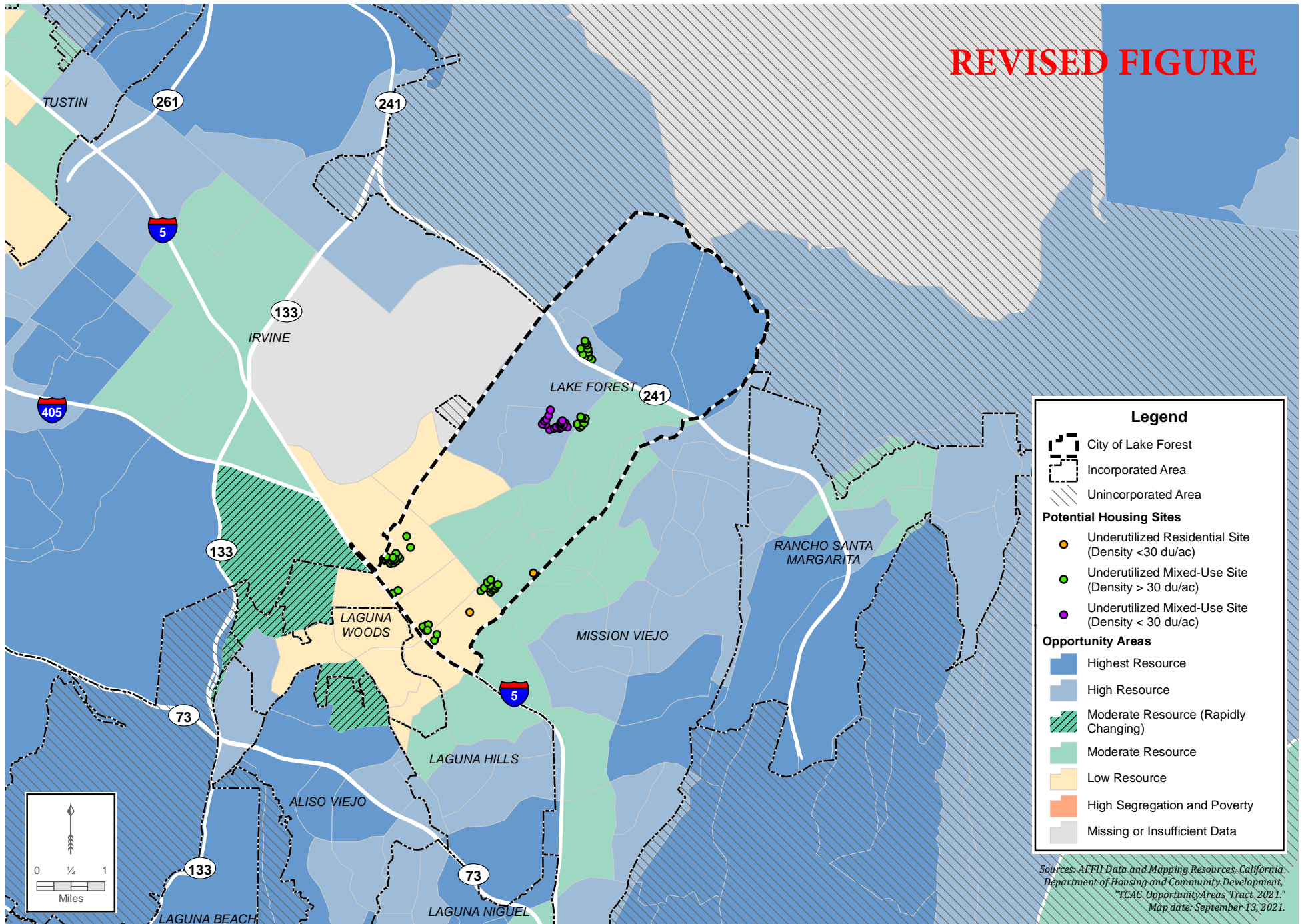


Figure 21: TCAC/HCD Opportunity Area Map

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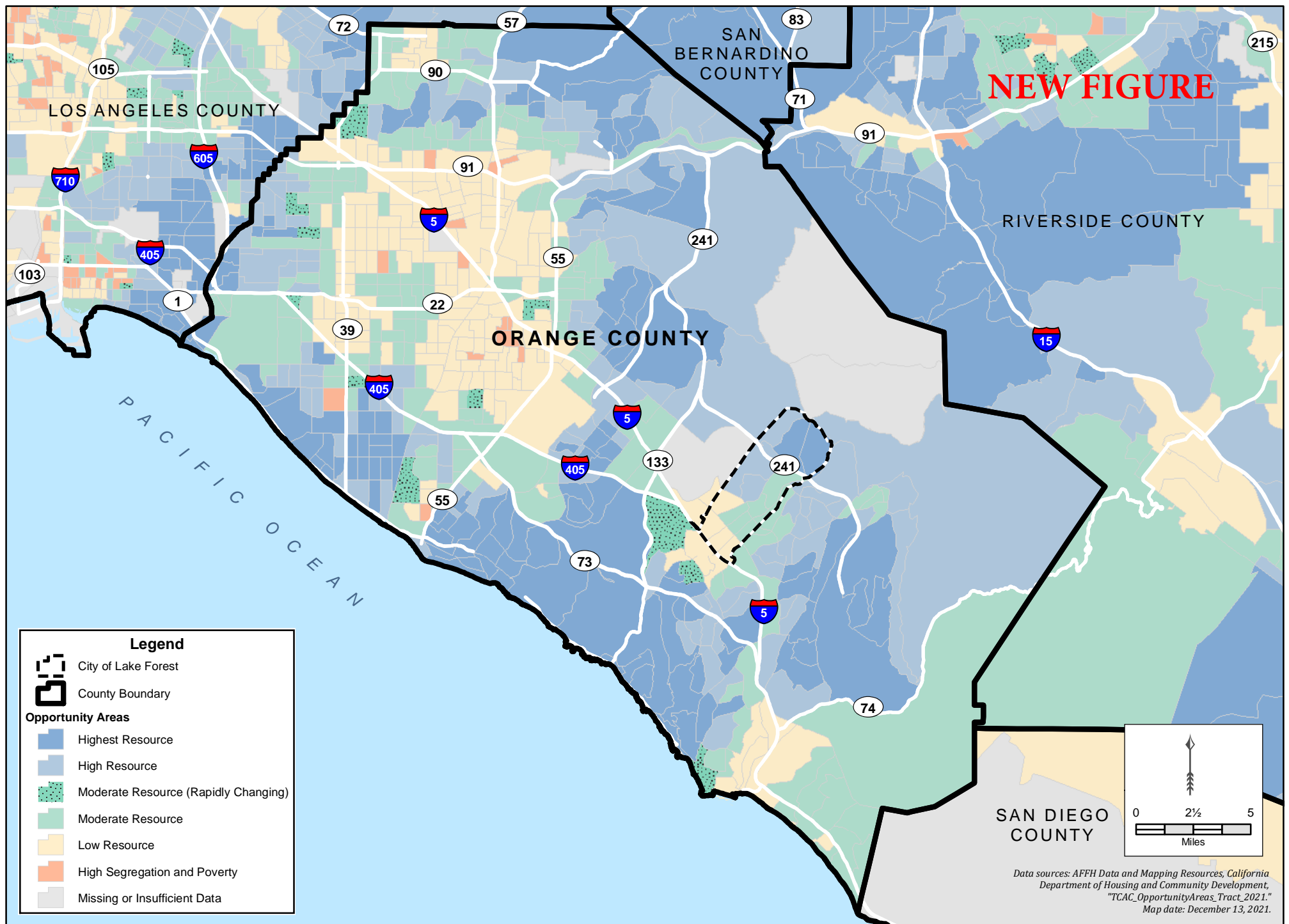


Figure 22: TCAC/HCD Opportunity Area Map - Countywide

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6C. Sites Inventory

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification includes not only an analysis of site capacity to accommodate the RHNA (provided in this section), but also considers whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. This section analyzes the role of all sites, regardless of income level, in assisting to affirmatively further fair housing. However, special attention is paid to those sites identified to accommodate a portion of the City's lower-income RHNA to ensure that the City is thinking carefully about how the development of new affordable housing options can promote patterns of equality and inclusiveness.

SEGREGATION/INTEGRATION

As previously stated, the City finds that there are no known historic patterns of segregation by race and ethnicity, persons with disabilities, familial status, age or income. Nonetheless, as described throughout this Housing Element, the City is committed to supporting the development of housing to promote a balanced and integrated community. This is highlighted in Table 67 in the Housing Resources chapter, as the City has identified a surplus of sites and excess development capacity for housing for all income levels.

Figure 5 shows the sites identified to meet Lake Forest's RHNA allocation in relation to racial/ethnic diversity. As shown, proposed ~~very-low and low-income RHNA sites underutilized mixed-use~~ sites, including those very-low and low-income RHNA sites underutilized mixed-use allowing for densities of at least 30 du/ac), are located throughout the community and are not concentrated in areas of low diversity. The vast majority of sites are located in areas of moderate to high diversity, and some sites (located along Lake Forest Drive) are in areas of low diversity.

Figure 7 shows the sites designated to meet Lake Forest's RHNA allocation in relation to the concentration of persons with disabilities. As shown, proposed sites, including those very-low and low-income sites (underutilized mixed-use sites allowing for densities of at least 30 du/ac), are located throughout the community and are not concentrated in areas with high proportions of persons with disabilities. The vast majority of sites are located in census tracts with 10% or less of the population indicating a disability, including some sites in areas with 10%-20% of residents indicating a disability. Additionally, the City's mixed-use areas are located near transit corridors and activity centers, which also benefits persons with disabilities. However, these sites are not concentrated in areas with already high levels of disability. The locations of sites designated to meet the City's ~~very-low and low-income~~ RHNA allocation are not expected to contribute to patterns of isolation or segregation for persons with disabilities.

Figure 9 shows the sites designated to meet Lake Forest's RHNA allocation in relation to female-headed households. As shown, proposed sites, including very-low and low-income sites (underutilized mixed-use sites allowing for densities of at least 30 du/ac), are located throughout the community and are not concentrated in areas with high levels of female-headed households. No sites are located in the census tract with the highest proportion of female-headed households. The locations of sites designated to meet the City's ~~very-low and low income~~ RHNA allocation are not expected to contribute to patterns of isolation or segregation for female-headed households.

Figure 11 shows the sites designated to meet Lake Forest's RHNA allocation in relation to concentration of senior residents. As shown, proposed sites, including very-low and low-income sites (underutilized mixed-use sites allowing for densities of at least 30 du/ac), are located throughout the community and are not concentrated in areas with high proportions of senior residents. The vast majority of sites are located in areas with low levels of senior residents (less than 20%) and some sites are located in areas where seniors make up 20-25% of the population. However, these areas (located generally along El Toro Road and Lake Forest Drive near I-5) are also good locations for seniors because they provide easy access to goods and services and are located near transportation facilities and activity centers. The locations of sites designated to meet the City's ~~very-low and low income~~ RHNA allocation are not expected to contribute to patterns of isolation or segregation for senior households.

Figure 13 shows the sites designated to meet Lake Forest's RHNA allocation in relation to median household income. As shown, proposed sites, including very-low and low-income RHNA sites (underutilized mixed-use sites allowing for densities of at least 30 du/ac), are located throughout the community and are not concentrated in areas with low median household income. Some candidate sites are located in one of the City's two lowest median household income census tracts, but as previously described, this census tract is home to many mobile/manufactured homes, which are not proposed for redevelopment. Development is expected to occur at other sites where nonresidential uses are currently (2021) located. The location of new development to meet the City's ~~very-low and low income~~ RHNA are not expected to contribute to patterns of isolation or segregation for lower-income households.

R/ECAPS

The City does not have any racially or ethnically concentrated areas of poverty and the identification of sites to accommodate the City's RHNA is not expected to alter this finding.

ACCESS TO OPPORTUNITY

Approximately 5% of the City's underutilized mixed-use sites are located within census tract 06059052423, which is considered an area with low place-based opportunities. The concerns in this area include neighborhood stability, access to supermarkets, and housing affordability. The introduction of new mixed-use development in this area will help to create more housing affordable to households at lower-income levels, introduce new residents to an area which can contribute to higher neighborhood stability, and expand opportunities for people to live and work in the same area. Taken together, new mixed-use development in this area, which is focused on underutilized commercial sites, will help to diversify the land use pattern without displacing existing residents.

One of the high opportunity areas identified in the analysis is the Foothill Ranch Towne Center, which originally represented a concentration of commercial land uses on 216 acres of land within the Foothill Ranch Planned Community. In the 1980's, 30 acres of land was developed as an Auto Center and medical office uses. Several rezonings have been approved by the City that allowed for 219 multi-family residential to be constructed on land that had formerly been used for auto dealerships. In addition, 3,710 single family and multi-family units are included within the Planned Community, which offer opportunities for the development of ADU's and increasing housing choices in the area.

DISPLACEMENT RISK

Figure 23 shows the sites designated to meet the ~~very-low and low-income~~ RHNA allocation ~~for Lake Forest sites (underutilized mixed-use sites allowing for densities of at least 30 du/ac)~~ in relation to percent of renter households overburdened by housing costs, by census tract. Some sites (located within the El Toro Road and Light Industrial focus areas) are located in the census tracts with the highest levels of renter households overburdened by housing costs and some sites (located within the El Toro Road and Lake Forest Drive focus areas) are located in the census tracts with the highest levels of homeowner households overburdened by housing costs. These patterns appear to be generally consistent with the prior analysis regarding median household incomes and access to opportunity as they relate to regional patterns, as illustrated in Figure 24. Figure 25 shows the sites proposed to meet Lake Forest's ~~very-low and low-income~~ RHNA allocation ~~(underutilized mixed-use sites allowing for densities of at least 30 du/ac)~~ in relation to percent of homeowner households overburdened by housing costs, by census tract. The intent of introducing new residential development in these areas (at locations currently developed with commercial uses) is to add new housing to desirable areas and provide a range of housing choices at different prices to current and future residents. The sites designated to accommodate the City's ~~lower-income~~ RHNA are not currently developed with residential uses and are not expected to displace current residents. A regional comparison is provided in Figure 26.

SITE ANALYSIS FINDINGS

To accommodate the City's RHNA allocation, five key focus areas of economic investment/opportunity have been identified consistent with the City's comprehensive General Plan Update (adopted in 2020). These focus areas include: El Toro Road, Lake Forest Drive, Light Industrial/Railroad, Civic Center, and Foothill Ranch Towne Center, all of which allow and incentivize mixed-use development at the densities needed to stimulate affordable housing development. These areas, located along transportation corridors and near activity centers, are designated for mixed-use development in the City's General Plan. ~~The City's very-low and low RHNA needs are largely~~The sites identified to accommodate the City's RHNA at all income levels are largely accommodated in these locations, which do not represent extremely concentrated racial or ethnic populations, persons with disabilities, female household, senior households, or low-income households. However, the City has included a program to encourage additional development of lower-income units throughout the community through its accessory dwelling unit program. For these reasons, the City finds that the sites proposed to accommodate its RHNA allocation do not unduly burden existing areas of concentrated racial or ethnic homogeneity, poverty, or other characteristics. Moreover, the sites affirmatively further fair housing by helping to stimulate investment in areas where additional people- and place-based opportunity is desired, and where new residential and/or mixed-use development can help to improve some of the opportunity level characteristics discussed earlier in this section.

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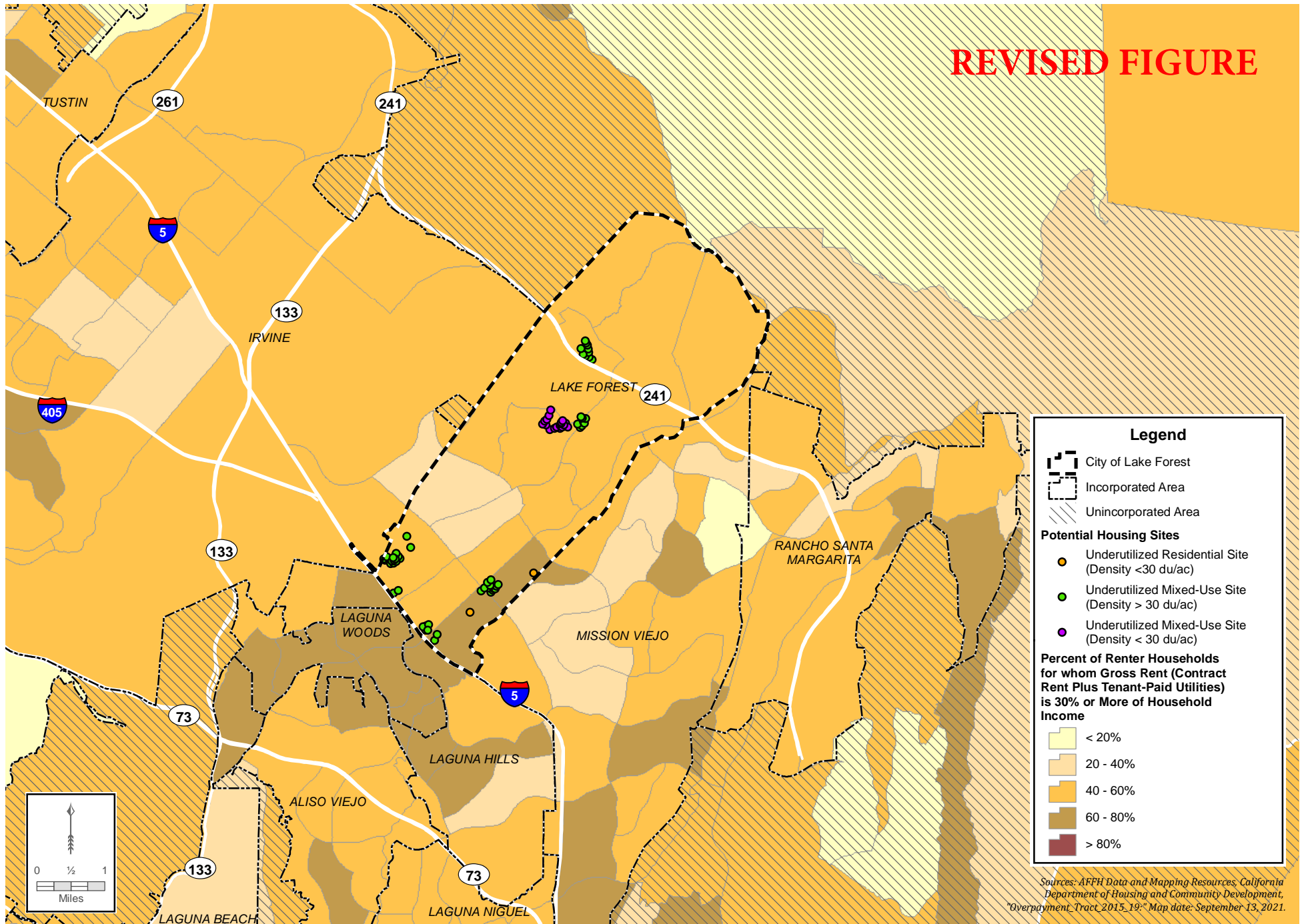


Figure 23: Cost-Burdened Renter Households by Census Tract

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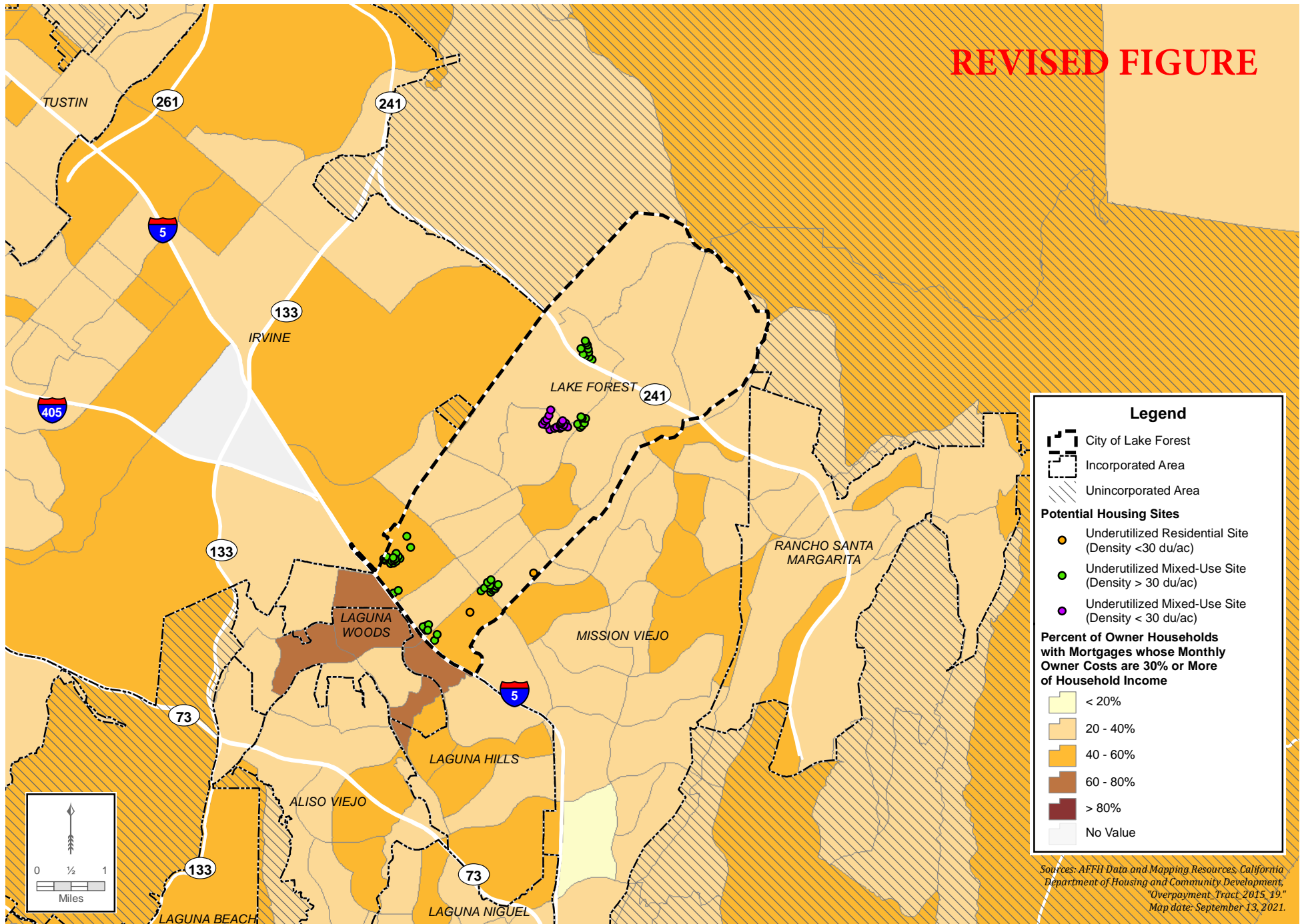


Figure 25: Cost-Burdened Owner Households by Census Tract

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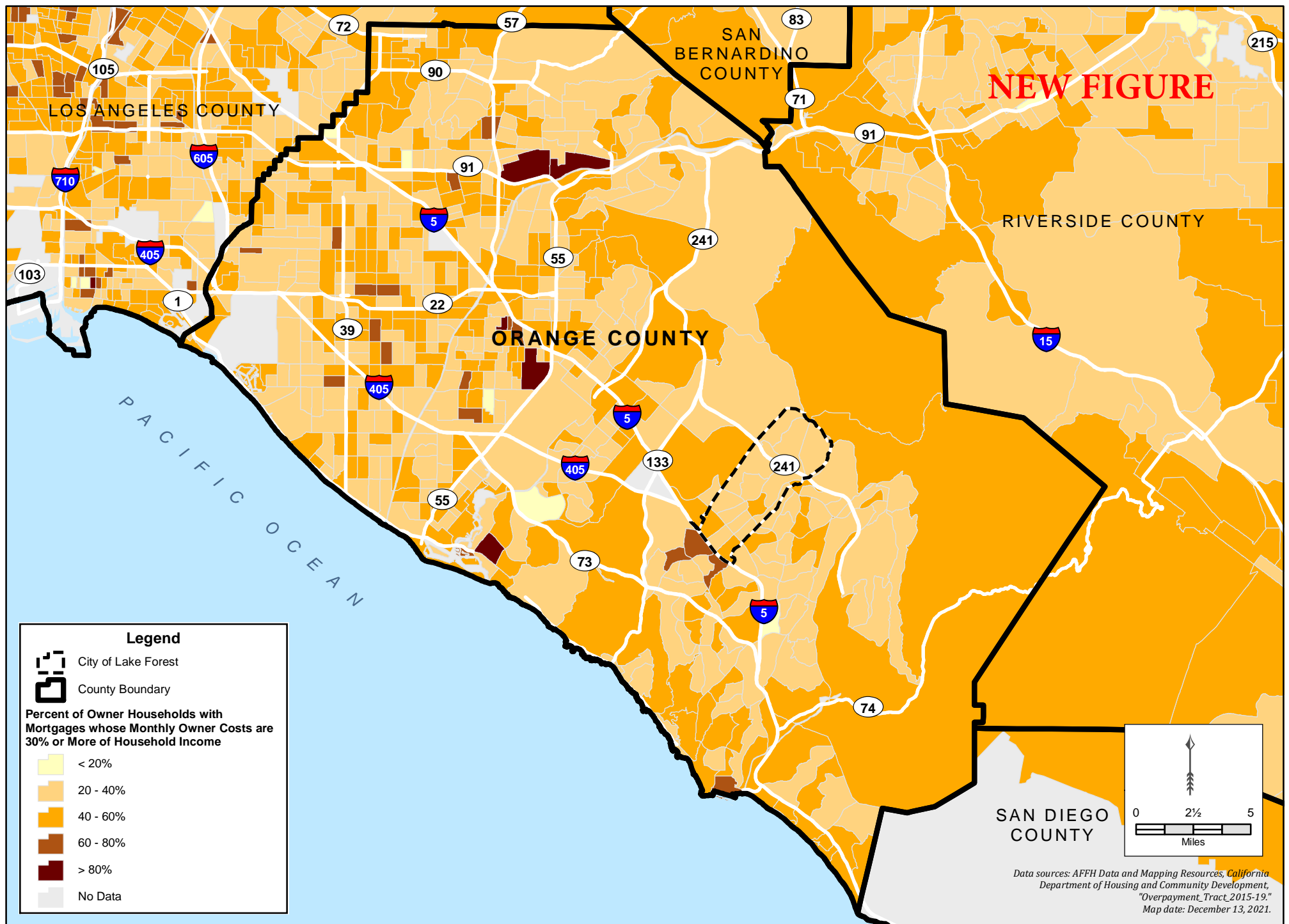


Figure 26: Cost-Burdened Owner Households by Census Tract - Countywide

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6D. Analysis of Contributing Factors and Fair Housing Priorities and Goals

The December 2015 Affirmatively Furthering Fair Housing Rule Guidebook identifies examples of contributing factors by each fair housing issue area: outreach, fair housing enforcement and outreach capacity, segregation and integration, racially and ethnically concentrated areas of poverty, disparities in access to opportunity, disparities in access to opportunities for persons with disabilities, disproportionate housing needs, including displacement risks, and sites inventory. ~~Based on the analysis included in this Background Report, the City has identified the following potential contributing factors to fair housing issues in Lake Forest and, as described later in this section, has developed a series of specific programs to address these contributing factors.~~

~~The following are contributing factors that have been identified based on the fair housing issues presented in the County AI and the analysis in this document that affect fair housing choice in Lake Forest, specifically. Table 76 lists the fair housing issues and contributing factors that exist in the City of Lake Forest and outlines the meaningful actions to be taken. The meaningful actions listed in the table relate to the actions identified in the Housing Plan.~~

~~TABLE 76: FAIR HOUSING ISSUES AND CONTRIBUTING FACTORS~~

<u>Fair Housing Issue</u>	<u>Contributing Factors</u>	<u>Priority</u>	<u>Meaningful Action</u>
<u>Outreach</u>	<ul style="list-style-type: none"> <u>Lack of resources for fair housing agencies and organizations</u> 	<u>Medium</u>	<ul style="list-style-type: none"> <u>Program 11</u> <u>Program 16</u> <u>Program 21</u> <u>Program 22</u>
<u>Fair Housing Enforcement and Outreach Capacity</u>	<ul style="list-style-type: none"> <u>Lack of local private fair housing outreach and enforcement</u> <u>Lack of resources for fair housing agencies and organizations</u> 	<u>High</u>	<ul style="list-style-type: none"> <u>Program 11</u> <u>Program 16</u> <u>Program 21</u> <u>Program 22</u>
<u>Segregation and Integration</u>	<ul style="list-style-type: none"> <u>Community opposition</u> <u>Displacement of residents due to economic pressures</u> <u>Lack of local or regional cooperation</u> <u>Land use and zoning laws</u> <u>Location and type of affordable housing</u> <u>Private discrimination</u> <u>Lack of public investment in specific neighborhoods, including services or amenities</u> 	<u>Medium</u>	<ul style="list-style-type: none"> <u>Program 1</u> <u>Program 2</u> <u>Program 3</u> <u>Program 4</u> <u>Program 5</u> <u>Program 11</u> <u>Program 13</u> <u>Program 15</u> <u>Program 21</u> <u>Program 22</u> <u>Program 23</u>
<u>Disparities in Access to Opportunity</u>	<ul style="list-style-type: none"> <u>Community opposition</u> <u>Displacement of residents due to economic pressures</u> <u>Impediments to mobility</u> <u>Lack of opportunity due to high housing costs</u> <u>Lack of local or regional cooperation</u> <u>Land use and zoning laws</u> <u>Quality of affordable housing information programs</u> <u>Lack of public investment in specific neighborhoods, including services or amenities</u> 	<u>High</u>	<ul style="list-style-type: none"> <u>Program 1</u> <u>Program 2</u> <u>Program 3</u> <u>Program 4</u> <u>Program 5</u> <u>Program 13</u> <u>Program 14</u> <u>Program 15</u> <u>Program 20</u> <u>Program 21</u> <u>Program 22</u> <u>Program 23</u>
<u>Disparities in Access to Opportunity for Persons with Disabilities</u>	<ul style="list-style-type: none"> <u>Access to transportation for persons with disabilities</u> <u>Lack of affordable in-home or community-</u> 	<u>Medium</u>	<ul style="list-style-type: none"> <u>Program 1</u> <u>Program 2</u> <u>Program 3</u>

	<u>based supportive services</u>		<ul style="list-style-type: none"> • <u>Program 4</u> • <u>Program 5</u> • <u>Program 10</u> • <u>Program 11</u> • <u>Program 12</u>
<u>Disproportionate Housing Needs, Including Displacement Risks</u>	<ul style="list-style-type: none"> • <u>Availability of affordable units in a range of sizes</u> • <u>Displacement of residents due to economic pressures</u> • <u>Lack of access to opportunity due to high housing costs</u> • <u>Land use and zoning laws</u> • <u>Lack of public investment in specific neighborhoods, including services or amenities</u> 	<u>High</u>	<ul style="list-style-type: none"> • <u>Program 1</u> • <u>Program 2</u> • <u>Program 3</u> • <u>Program 4</u> • <u>Program 5</u> • <u>Program 13</u> • <u>Program 14</u> • <u>Program 15</u> • <u>Program 20</u> • <u>Program 21</u> • <u>Program 22</u> • <u>Program 23</u>

The City has identified the following primary contributing factors and prioritized their importance:

1. **Land use and zoning laws.** The City of Lake Forest comprehensively updated its General Plan in 2020 to allow for new mixed-use development at densities not previously allowed in Lake Forest. Before this update, the City's land use direction did not allow for development at densities sufficiently high to promote the development of affordable housing. In the past, the City has relied on Development Agreements to procure the development of affording units as part of new residential developers. However, the new General Plan identifies areas for mixed-use development at densities of up to 32 du/ac or 43 du/ac, depending on the location. By allowing for residential development where residential development was not previously allowed, the City formalized a plan to accommodate new growth at key locations near a transportation corridor and activity centers where jobs and housing can be located close together. The City is currently updating its Zoning Code to include new standards for the City's mixed-use areas and to provide clear direction to the development community. As part of this effort, the City continues to encourage the provision of 15% affordable units in conjunction with new market rate housing. Programs 1, 2, and 7 have been included to address this contributing factor.
2. **Lack of public investment in specific neighborhoods, including services or amenities.** The Fair Housing Analysis included in this section illustrates the need for focused attention in the southwest Lake Forest neighborhood, which is one of the City's lower-income neighborhoods, most racially segregated, with the most limited access to opportunity. The southwest Lake Forest neighborhood is one of the oldest residential communities not just in Lake Forest, but in south-Orange County. The homes in this area are more likely to be in need of repair and language barriers may make it more challenging for the City to educate residents on housing programs and their right to fair and safe housing opportunities. To address this contributing factor, the City has created a Neighborhood Improvement Task Force (Program 24), with the intent to identify concerns facing specific neighborhoods (beginning with southwest Lake Forest) and fund improvements to address concerns. The City has identified southwest Lake Forest as the first neighborhood to receive this special attention and has committed \$70,500 in the 2021-2023 budget to implement the recommendations of the Neighborhood Improvement Study.
3. **Community opposition.** The County AI identified community opposition as a potential significant contributing factor to fair housing issues in Orange County and Lake Forest. In Lake Forest, and many other communities, there is a lack of community understanding around affordable housing and the important role it plays in helping meet the needs of a variety of community members, including young people, working professionals, seniors, persons with disabilities, single-parent households, low-income households, and other at-risk populations. Program 22, *Affirmatively Furthering Fair Housing Outreach and Coordination Program*, has been included in the City's Housing Plan to address this contributing factor.

Moving forward, the City remains committed to providing a diversity of housing options for all income levels, encouraging development throughout the community to help overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. The vast majority of the City's Housing Programs designed to address fair housing are required to be implemented on an ongoing basis, with annual progress reports and programs evaluations to ensure they are achieving the City's objectives. The following list summarizes those programs identified in this Housing Element which affirmatively further fair housing and implement the County AI's recommendations:

- Program 4, to replace affordable units
 - Program 5, to facilitate affordable and special needs housing construction
 - Program 7, to accommodate specialized housing types and update the City's policies and procedures regarding mixed-use development, low barrier navigation centers, supportive housing, employee housing, and farmworker housing
 - Program 8, to encourage the production of accessory dwelling units
 - Program 9, to allow for homeless shelters
 - Program 10, to allow for transitional and supportive housing
 - Program 13, to ensure that the City's density bonus ordinance continues to be in compliance with state law
 - Program 22, to continue utilizing a fair housing service provider to assist with addressing fair housing issues in Lake Forest and to educate the community, especially Lake Forest's underserved and underrepresented residents, and affirmatively further fair housing
 - Program 23, to study and address economic displacement risks
3. To the extent that these programs represent ongoing work efforts, these programs are evaluated for effectiveness in Section 2 of this Background Report. The City has undertaken a series of proactive amendments to its Zoning Ordinance to address new requirements related to density bonus law and accessory dwelling units, and the City will continue to partner with local and regional stakeholders to affirmatively further fair housing.

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Appendix A: Site Inventory

~~Public~~ Final Draft
~~September~~ December 2021

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**Please Start Here, Instructions in Cell A2,
Table in A3:B15**

Form Fields

Site Inventory Forms must be submitted to HCD for a housing element or amendment adopted on or after January 1, 2021. The following form is to be used for satisfying this requirement. To submit the form, complete the Excel spreadsheet and submit to HCD at sitesinventory@hcd.ca.gov. Please send the Excel workbook, not a scanned or PDF copy of the tables.

General Information	
Jurisdiction Name	LAKE FOREST
Housing Element Cycle	6th
Contact Information	
First Name	Gayle
Last Name	Ackerman
Title	of Community Deve
Email	ackerman@lakeforestca.g
Phone	(949) 461-3463
Mailing Address	
Street Address	<u>Drive</u>
City	Lake Forest
Zip Code	92630

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

Jurisdiction Name	Site Address/Jurisdiction	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
LAKE FOREST	25072 PROTHERO	92630	617-064-18		LOW-MEDIUM DENSITY RES	R2 - Multifamily Dwell	7	15	0.630937691	Vacant	YES - Current	NO - Privately-Owned	Available				8	8	36	Low Resource	
LAKE FOREST	23139 LOS ALIZOS BLVD	92630	613-351-05		MEDIUM DENSITY RESIDE	R2 - Multifamily Dwell	15	25	33.91986634	Residential, 304	YES - Current	NO - Privately-Owned	Available			187	187	374	374	Moderate Resource	

Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Optional Information1	Optional Information2	Optional Information3
LAKE FOREST	23861 EL TORO RD	92630	617-053-09	12	6	8	0	Shortfall of Sites	1.263383665	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	27	Non-Vacant	Underutilized	1	Low Resource	El Toro
LAKE FOREST	23862 BRIDGER RD	92630	617-053-10	12	6	8	0	Shortfall of Sites	1.300886979	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	27	Non-Vacant	Underutilized	2	Low Resource	El Toro
LAKE FOREST	23861 EL TORO RD	92630	617-053-02	8	4	5	0	Shortfall of Sites	0.852017981	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	18	Non-Vacant	Underutilized	3	Low Resource	El Toro
LAKE FOREST	61782 BRIDGER RD	92630	617-053-03	31	6	20	0	Shortfall of Sites	3.258929751	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	68	Non-Vacant	Underutilized	4	Low Resource	El Toro
LAKE FOREST	23831 EL TORO RD	92630	617-053-11	81	42	53	0	Shortfall of Sites	8.389165381	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	176	Non-Vacant	Underutilized	5	Low Resource	El Toro
LAKE FOREST	MERCURY RD & ROCKFIELD BLVD	92630	617-474-16	20	11	13	0	Shortfall of Sites	2.100187898	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	44	Non-Vacant	Underutilized	6	Low Resource	Lake Forest Dr
LAKE FOREST	23764 MERCURY RD	92630	617-474-10	40	21	26	0	Shortfall of Sites	4.160877054	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	87	Non-Vacant	Underutilized	7	Low Resource	Lake Forest Dr
LAKE FOREST	23591 ROCKFIELD BLVD	92630	617-431-06	8	4	5	0	Shortfall of Sites	0.786263300	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	17	Non-Vacant	Underutilized	8	Low Resource	Lake Forest Dr
LAKE FOREST	23581 ROCKFIELD BLVD	92630	617-431-07	9	5	6	0	Shortfall of Sites	0.963305525	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	20	Non-Vacant	Underutilized	9	Low Resource	Lake Forest Dr
LAKE FOREST	22821 ASPAN ST	92630	617-433-03	14	7	9	0	Shortfall of Sites	1.452112906	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	30	Non-Vacant	Underutilized	10	Low Resource	Lake Forest Dr
LAKE FOREST	22762 ASPAN ST	92630	617-433-04	12	6	8	0	Shortfall of Sites	1.181806178	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	25	Non-Vacant	Underutilized	11	Low Resource	Lake Forest Dr
LAKE FOREST	22771 CENTRE DR	92630	617-431-02	34	18	22	0	Shortfall of Sites	3.465348263	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	73	Non-Vacant	Underutilized	12	Low Resource	Lake Forest Dr
LAKE FOREST	ASPAN ST & CENTRE DR	92630	617-433-08	22	12	14	0	Shortfall of Sites	2.283045846	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	48	Non-Vacant	Underutilized	13	Low Resource	Lake Forest Dr
LAKE FOREST	22681 LAKE FOREST DR	92630	617-482-01	77	40	50	0	Shortfall of Sites	7.995414481	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	168	Non-Vacant	Underutilized	14	Low Resource	Lake Forest Dr
LAKE FOREST	22471 ASPAN ST	92630	617-481-04	13	7	8	0	Shortfall of Sites	1.319692179	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	28	Non-Vacant	Underutilized	15	Low Resource	Lake Forest Dr
LAKE FOREST	20780 LAKE FOREST DR C	92630	613-621-16	6	3	4	0	Shortfall of Sites	0.8517301	MIXED-USE 32	Community Commer	MIXED-USE 32MU-32		0	32	14	Non-Vacant	Underutilized	16	Moderate Resource	Civic Center
LAKE FOREST	20768 LAKE FOREST DR	92630	613-621-17	9	5	6	0	Shortfall of Sites	1.275748018	MIXED-USE 32	Community Commer	MIXED-USE 32MU-32		0	32	20	Non-Vacant	Underutilized	17	Moderate Resource	Civic Center
LAKE FOREST	20761 LAKE FOREST DR	92630	613-622-09	12	6	8	0	Shortfall of Sites	1.603887531	MIXED-USE 32	Community Commer	MIXED-USE 32MU-32		0	32	26	Non-Vacant	Underutilized	18	High Resource	Civic Center
LAKE FOREST	20722 LAKE FOREST DR	92630	613-621-12	6	3	4	0	Shortfall of Sites	0.742644428	MIXED-USE 32	Community Commer	MIXED-USE 32MU-32		0	32	12	Non-Vacant	Underutilized	19	Moderate Resource	Civic Center
LAKE FOREST	20702 LAKE FOREST DR	92630	613-621-10	16	8	10	0	Shortfall of Sites	2.153975934	MIXED-USE 32	Community Commer	MIXED-USE 32MU-32		0	32	34	Non-Vacant	Underutilized	20	Moderate Resource	Civic Center
LAKE FOREST	20652 LAKE FOREST DR	92630	613-621-11	8	4	5	0	Shortfall of Sites	1.116763122	MIXED-USE 32	Community Commer	MIXED-USE 32MU-32		0	32	18	Non-Vacant	Underutilized	21	Moderate Resource	Civic Center
LAKE FOREST	20651 LAKE FOREST DR	92630	613-623-02	5	2	3	0	Shortfall of Sites	0.640688995	MIXED-USE 32	Community Commer	MIXED-USE 32MU-32		0	32	10	Non-Vacant	Underutilized	22	High Resource	Civic Center
LAKE FOREST	20672 LAKE FOREST DR	92630	613-623-01	12	6	8	0	Shortfall of Sites	1.656835566	MIXED-USE 32	Community Commer	MIXED-USE 32MU-32		0	32	27	Non-Vacant	Underutilized	23	High Resource	Civic Center
LAKE FOREST	20672 TOWNE CENTRE DR	92610	612-093-34	37	19	24	0	Shortfall of Sites	3.860876703	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	81	Non-Vacant	Underutilized	24	High Resource	Foothill Ranch
LAKE FOREST	26642 TOWNE CENTRE DR	92610	612-093-33	36	19	22	0	Shortfall of Sites	3.77410289	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	79	Non-Vacant	Underutilized	25	High Resource	Foothill Ranch
LAKE FOREST	26632 TOWNE CENTRE DR	92610	612-093-32	34	18	22	0	Shortfall of Sites	3.503322993	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	74	Non-Vacant	Underutilized	26	High Resource	Foothill Ranch
LAKE FOREST	26622 TOWNE CENTRE DR	92610	612-093-26	11	6	7	0	Shortfall of Sites	1.135987336	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	24	Non-Vacant	Underutilized	27	High Resource	Foothill Ranch
LAKE FOREST	26612 TOWNE CENTRE DR	92610	612-093-27	21	11	14	0	Shortfall of Sites	2.189852497	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	46	Non-Vacant	Underutilized	28	High Resource	Foothill Ranch
LAKE FOREST	26591 TOWNE CENTRE DR	92610	612-093-25	12	6	8	0	Shortfall of Sites	1.254114584	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	26	Non-Vacant	Underutilized	29	High Resource	Foothill Ranch
LAKE FOREST	26582 TOWNE CENTRE DR	92610	612-093-16	12	6	8	0	Shortfall of Sites	1.196160596	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	25	Non-Vacant	Underutilized	30	High Resource	Foothill Ranch
LAKE FOREST	26572 TOWNE CENTRE DR	92610	612-093-30	6	3	4	0	Shortfall of Sites	0.572548683	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	12	Non-Vacant	Underutilized	31	High Resource	Foothill Ranch
LAKE FOREST	26602 TOWNE CENTRE DR	92610	612-093-13	157	82	103	0	Shortfall of Sites	16.26471722	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	342	Non-Vacant	Underutilized	32	High Resource	Foothill Ranch
LAKE FOREST	26526 TOWNE CENTRE DR	92610	612-093-31	10	5	6	0	Shortfall of Sites	1.019581701	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	21	Non-Vacant	Underutilized	33	High Resource	Foothill Ranch
LAKE FOREST	214280 SWARTZ DR 1	92630	617-501-01	59	31	39	0	Shortfall of Sites	6.153220763	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	129	Non-Vacant	Underutilized	34	Low Resource	El Toro
LAKE FOREST	24392 ROCKFIELD BLVD	92630	617-501-04	88	46	58	0	Shortfall of Sites	9.161718949	MIXED-USE 43	Community Commer	MIXED-USE 43MU-43		0	43	192	Non-Vacant	Underutilized	35	Low Resource	El Toro
LAKE FOREST	22722 CENTRE DR	92630	617-432-03	7	4	5	0	Shortfall of Sites	1.326326663	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	28	Non-Vacant	Underutilized	36	Low Resource	Lake Forest Dr
LAKE FOREST	22765 ASPAN ST	92630	617-432-18	7	4	5	0	Shortfall of Sites	0.738090139	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	15	Non-Vacant	Underutilized	37	Low Resource	Lake Forest Dr
LAKE FOREST	22741 ASPAN ST	92630	617-432-19	6	3	4	0	Shortfall of Sites	0.589382745	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	12	Non-Vacant	Underutilized	38	Low Resource	Lake Forest Dr
LAKE FOREST	22684 LAKE FOREST DR	92630	617-432-14	7	4	5	0	Shortfall of Sites	0.742447582	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	16	Non-Vacant	Underutilized	39	Low Resource	Lake Forest Dr
LAKE FOREST	22665 LAKE FOREST DR	92630	617-432-25	5	3	3	0	Shortfall of Sites	0.510942448	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	11	Non-Vacant	Underutilized	40	Low Resource	Lake Forest Dr
LAKE FOREST	22855 LAKE FOREST DR	92630	617-432-13	11	6	7	0	Shortfall of Sites	1.077684003	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	23	Non-Vacant	Underutilized	41	Low Resource	Lake Forest Dr
LAKE FOREST	22831 LAKE FOREST DR	92630	617-432-09	12	6	8	0	Shortfall of Sites	1.304262211	MIXED-USE 43	Industrial Park	MIXED-USE 43MU-43		0	43	27	Non-Vacant	Underutilized	42	Low Resource	Lake Forest Dr
LAKE FOREST	ORANGE AVE & WHISLER DR	92630	617-241-57	6	3	4	0	Shortfall of Sites	0.591088064	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	12	Non-Vacant	Underutilized	43	Low Resource	Industrial/Rail
LAKE FOREST	21142 FRONT ST	92630	613-374-08	19	10	12	0	Shortfall of Sites	1.960023622	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	41	Non-Vacant	Underutilized	44	Moderate Resource	Industrial/Rail
LAKE FOREST	23131 ORANGE AVE	92630	613-371-01	23	12	15	0	Shortfall of Sites	2.43740836	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	51	Non-Vacant	Underutilized	45	Moderate Resource	Industrial/Rail
LAKE FOREST	23081 ORANGE AVE A	92630	613-361-03	9	5	6	0	Shortfall of Sites	0.917284252	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	19	Non-Vacant	Underutilized	46	Moderate Resource	Industrial/Rail
LAKE FOREST	25101 FRONT ST	92630	613-372-05	5	3	3	0	Shortfall of Sites	0.506062343	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	11	Non-Vacant	Underutilized	47	Moderate Resource	Industrial/Rail
LAKE FOREST	23132 ORANGE AVE	92630	613-372-02	19	10	13	0	Shortfall of Sites	1.981549095	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	42	Non-Vacant	Underutilized	48	Moderate Resource	Industrial/Rail
LAKE FOREST	23132 ORANGE AVE	92630	613-372-01	8	4	5	0	Shortfall of Sites	0.844330933	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	18	Non-Vacant	Underutilized	49	Moderate Resource	Industrial/Rail
LAKE FOREST	23222 OLIVE AVE	92630	613-373-06	11	6	7	0	Shortfall of Sites	1.166339659	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	24	Non-Vacant	Underutilized	50	Moderate Resource	Industrial/Rail
LAKE FOREST	CHERRY AVE & FRONT ST	92630	613-373-03	6	3	4	0	Shortfall of Sites	0.65144373	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	14	Non-Vacant	Underutilized	51	Moderate Resource	Industrial/Rail
LAKE FOREST	OLIVE AVE & FRONT ST	92630	613-373-02	8	4	5	0	Shortfall of Sites	0.82959033	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	17	Non-Vacant	Underutilized	52	Moderate Resource	Industrial/Rail
LAKE FOREST	23271 CHERRY AVE	92630	613-373-01	12	6	8	0	Shortfall of Sites	1.218513426	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	26	Non-Vacant	Underutilized	53	Moderate Resource	Industrial/Rail
LAKE FOREST	23211 CHERRY AVE	92630	613-362-04	16	8	10	0	Shortfall of Sites	1.641492507	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	34	Non-Vacant	Underutilized	54	Moderate Resource	Industrial/Rail
LAKE FOREST	25312 JERONIMO RD	92630	613-362-02	14	7	9	0	Shortfall of Sites	1.437847034	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS-U43		0	43	30	Non-Vacant	Underutilized	55	Moderate Resource	Industrial/Rail
LAKE FOREST	INDIAN OCEAN DR & COMMERCE CENTRE DR	92630	610-332-07	0	0	21	21	Shortfall of Sites	3.464594704	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS-U25		0	25	42	Non-Vacant	Underutilized	56	High Resource	Civic Center
LAKE FOREST	20712 CIVIC CENTER DR	92630	610-332-06	0	0	7	7	Shortfall of Sites	1.192169857	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS-U25		0	25	14	Non-Vacant	Underutilized	57	High Resource	Civic Center
LAKE FOREST	INDIAN OCEAN DR & COMMERCE CENTRE DR	92630	610-332-04	0	0	14	14	Shortfall of Sites	2.328404565	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS-U25		0	25	28	Non-Vacant	Underutilized	58	High Resource	Civic Center
LAKE FOREST	26062 CIVIC CENTER DR	92630	610-332-09	0	0	30	30	Shortfall of Sites	4.964294627	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS-U25		0	25	60	Non-Vacant	Underutilized	59	High Resource	Civic Center
LAKE FOREST	26000 COMMERCE CENTRE DR	92630	610-332-08	0	0	19	19	Shortfall of Sites	3.089663236	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS-U25		0	25	37	Non-Vacant	Underutilized	60	High Resource	Civic Center
LAKE FOREST	INDIAN OCEAN DR & COMMERCE CENTRE DR	92630	104-132-79	0	0	15	15														

Table C: Land Use, Table Starts in A2

Zoning Designation (From Table A, Column G)	General Land Uses Allowed
R2 Multifamily	Multifamily dwellings; single-family dwellings; modishome developments; residential condominiums; residential planned (unit) developments.

Suitability of Nonvacant Sites | City of Lake Forest 6th Cycle RHNA

Address	Map Reference	APN	Specific Description of Uses	Known Vacancies/For Rent	Demand for Current Use	Redevelopment Trends Present					Site Characteristics (Low Utilization/Blighted)
						Over supply of Retail	Discontinuation of Office (Work from Home)	Vacancies/For Rent/For Sale	Opportunity for Infill (Keep Existing Uses)	Expressed Property Owner Interest	
23861 EL TORO RD	1	617-053-09	Commercial use, 7-story multi-tenant office building. Saddleback Executive Suites. Former Chase Bank on bottom floor (listed as "permanently closed" on Google) with suites above. Street access from El Toro Road and driveway to back entrance and large parking lot. Not currently listed for lease or sale on Loopnet. https://www.loopnet.com/Listing/23861-El-Toro-Rd-Lake-Forest-CA/11282809/ . Large angled parking lot.	Likely, but unconfirmed	Moderate		X	X	X	X	
23862 BRIDGER RD	2	617-053-10	Commercial use, 1 story restaurant/bar (occupied by The Pub) and parking lot. Connected to fast-food (Arby's) with a drive-thru. Small enclosed outside patio. Small/Medium parking lot as part of a larger parking lot (connects to 23861 El Toro Rd)		Low	X					X
23861 EL TORO RD	3	617-053-02	Parking lot and drive-thru ATM (Chase). Angled parking used for 23861 El Toro Rd		Moderate				X	X	X
23782 BRIDGER RD	4	617-053-03	Commercial/light industrial use, 1 story nursery (Green Thumb Nursery). Small building footprint, larger storage and dirt/gravel plant area with plants for sale, pallets/soil/groundcover and loading/unloading area. 2 in/out driveways along Bridger Rd and 1 loading/unloading driveway. No sidewalk along Bridger Rd (paved sidewalk north and south of site terminates)		Low	X					X
23831 EL TORO RD	5	617-053-11	Multi-tenant commercial use shopping mall and parking lot. Lake Forest Marketplace shopping center. Big box retailers (99 Cent Store, Guitar Center, Harbor Freight), Bank of America, smaller restaurants & retail (T-shirts Plus, Cigar Bar, etc.). Large parking lot with multiple access driveways, parking aisles, a Del Taco drive-thru. Three (3) units for lease (16,838 SF of retail at 23783-23811 El Toro Rd) https://www.loopnet.com/Listing/23783-23811-El-Toro-Rd-Lake-Forest-CA/18001783/	Three units for lease	Low	X		X			X
MERCURY RD & ROCKFIELD BLVD	6	617-474-16	Commercial use and medium/large parking lot. 1 story retail chains (Turner's Outdoorsman and Boot Barn). Part of Rockfield Place shopping mall (along with Map Reference 7). Borders I-5 freeway on western side. Medium/large 90-degree parking lot looks underutilized		Low	X		X			X
23764 MERCURY RD	7	617-474-10	Commercial use and parking lot (Rockfield Showplace). 1 story retail (Salvation Army, restaurant, Leslie's Pool Supplies, massage, dentist) in a strip-mall setting with medium/large 90-degree parking lot, lot looks underutilized. Part of Rockfield Place shopping Mall (along with Map Reference 6). One (1) unit for lease (1,792 SF of retail at 23804) https://www.loopnet.com/Listing/23762-23822-Mercury-Rd-Lake-Forest-CA/12314921/	One unit for lease (23804)	Low	X		X			
23591 ROCKFIELD BLVD	8	617-431-06	1-story commercial use in strip-mall setting: Rockfield Center. Enterprise Rent-A-Car and 5 other small retail/restaurants with a small 90-degree parking lot with one aisle, two driveways (Rockefeller Blvd and Centre Dr). Slightly unkempt.		Low	X					X
23581 ROCKFIELD BLVD	9	617-431-07	Commercial/light industrial use car wash (Checked Flag). Lots of pavement (loading/driveway/parking), enclosed automatic car wash and vacuums at parking stalls. Driveway shares entrance with Map Reference 8 (on Rockefeller Blvd)		Low						X
22821 ASPAN ST	10	617-433-03	1-story commercial with small office/retail uses (fitness studio, trophy engravers, physical therapy, salon). Part of Aspan Plaza neighborhood shopping center, medium size parking lot with multiple aisles, 90-degree parking. Driveway access from Aspan St. two (2) units for lease (5,000 sf of retail) https://www.loopnet.com/Listing/22821-Lake-Forest-Dr-Lake-Forest-CA/11747867/ . Shares parking lot with Map Reference 11	Two units for lease (ste 109 and 206)	Low	X		X			X
22762 ASPAN ST	11	617-433-04	1-story commercial with small office/retail uses (acupuncture, pawn shop). Part of Aspan Plaza neighborhood shopping center, medium size parking lot with multiple aisles, 90-degree parking. Driveway access from Aspan St. Shares parking lot with Map Reference 10	See Map Reference 10	Low	X		X			X
22771 CENTRE DR	12	617-431-02	1-story commercial with one tenant, bowling alley (Forest Lanes) with large parking lot that appears to be severely underutilized		Low					X	X
ASPAN ST & CENTRE DR	13	617-433-08	1-story commercial with small office/retail uses (medical, real estate office, copy store, etc.). Part of Aspan Plaza neighborhood shopping center, medium size parking lot with multiple aisles, 90-degree parking. one (1) unit for lease (500 sf of office/retail). https://www.loopnet.com/Listing/22706-22762-Aspan-St-Lake-Forest-CA/12854621/	One unit for lease (ste 703b)	Low	X	X	X			X
22681 LAKE FOREST DR	14	617-493-01	1-story, multi-tenant commercial use shopping mall and large parking lot. Lake Forest Town Center. Retail big box (99 cent store) and chains (Pepboys, Wingstop, Jack in the Box with drive-thru), with several smaller restaurant and retail uses. Six (6) units for lease (one large 6,225 sf that was former Mimi's Restaurant and five 1,000-1,500 SF units) https://www.loopnet.com/Listing/22651-22671-Lake-Forest-Dr-Lake-Forest-CA/12017031/	6 units for lease	Low	X		X			X
22471 ASPAN ST	15	617-491-04	2 story office building and parking lot. Aspan Office Center. Built in 1980s.		Low		X				X
20780 LAKE FOREST DR C	16	613-621-16	1 story office/restaurant (Starbucks drive-thru, veterinary, bakery, salon) and parking lot. One (1) unit for lease (1800 SF) https://www.loopnet.com/Listing/20770-20780-Lake-Forest-Dr-Lake-Forest-CA/12171787/	1 unit for lease	Moderate/Mixed Low (Newer hotels available)	X	X	X			X
20768 LAKE FOREST DR	17	613-621-17	3-story hotel use (Holiday Inn Express) and parking lot.		Low						
20761 LAKE FOREST DR	18	613-622-09	1 story retail/restaurant in strip-mall setting		Low	X					X
20722 LAKE FOREST DR	19	613-621-12	1 story self-service car wash. 4 long loading driveways going into car wash bay. Parking and vacuums.		Low	X					X
20702 LAKE FOREST DR	20	613-621-10	Multi-tenant 1 story restaurant/auto repair uses in horseshoe-shaped, strip-mall setting.		Low	X					X
20652 LAKE FOREST DR	21	613-621-11	1 story restaurant (Wienerschnitzel) with drive-thru and parking lot.		Low	X					X
20651 LAKE FOREST DR	22	613-623-02	1 story multi-tenant mini-mall (Foothill Retail Center). Liquor store, deli, salon, preschool and parking lot. Main suite appears vacant (dark windows, no signage).	Possibly, at least one unit appears vacant	Low	X		X			X
20671 LAKE FOREST DR	23	613-623-01	1 story corner restaurant/medical uses. In same parking lot as Map reference Number 22.		Low	X		X			X
26672 TOWNE CENTRE DR	24	612-093-34	3 story office uses and parking lot		Low		X				X
26642 TOWNE CENTRE DR	25	612-093-33	3 story office uses and parking lot		Low		X				X
26632 TOWNE CENTRE DR	26	612-093-32	3 story office uses and parking lot. 3 office units for lease	3 units for lease	Low		X	X			X
26622 TOWNE CENTRE DR	27	612-093-26	1 story bank (Wells Fargo) (part of Foothill Ranch Towne Center, a large outdoor mall).		Moderate				X		X
26612 TOWNE CENTRE DR	28	612-093-27	1 story multiple restaurants and large parking lot (part of Foothill Ranch Towne Center, a large outdoor mall).		Moderate				X		X
26592 TOWNE CENTRE DR	29	612-093-25	1 story freestanding restaurant (Miguel's) (part of Foothill Ranch Towne Center, a large outdoor mall).		Moderate				X		X
26582 TOWNE CENTRE DR	30	612-093-16	1 story freestanding restaurant (Islands) (part of Foothill Ranch Towne Center, a large outdoor mall).		Moderate				X		X
26572 TOWNE CENTRE DR	31	612-093-30	1 story freestanding restaurant (vacant, used to be Souplantation). Part of Foothill Ranch Towne Center. For lease, 7,500 SF. https://www.loopnet.com/Listing/26572-Towne-Centre-Dr-Foothill-Ranch-CA/19523509/	Yes, vacant	Moderate			X	X		
26602 TOWNE CENTRE DR	32	612-093-13	Large 1 story cinema (Regal Cinemas) and parking lot (part of Foothill Ranch Towne Center)		Moderate				X		
26526 TOWNE CENTRE DR	33	612-093-31	Large 1 story restaurant/entertainment (Chuck E Cheese) and parking lot.		Moderate				X		
24288 SWARTZ DR 1	34	617-501-01	Large 1-story, multi-building, multi-tenant retail/restaurant (Big 5 Sports, Tommy's, etc.) shopping mall and large parking lot. Built approx. 1980. Two (2) large (~6,000 SF) retail units for lease. https://www.loopnet.com/Listing/24280-24400-Swartz-Dr-Lake-Forest-CA/19523509/	2 units for lease	Low	X		X			X
24392 ROCKFIELD BLVD	35	617-501-04	Large 1-story, multi-unit shopping mall (Sprouts, CVS, Ross) with smaller retail units (massage, clothing store, etc and parking lot.		Low	X					X
23139 LOS ALISOS BLVD	37	613-351-05	Saddleback Ranch Apartments developed with 304 units		Moderate					X	X

Address	Map Reference	APN	Specific Description of Uses	Known Vacancies/For Rent	Demand for Current Use	Redevelopment Trends Present					Site Characteristics (Low Utilization/Blighted)
						Oversupply of Retail	Discontinuation of Office (Work from Home)	Vacancies/For Rent/For Sale	Opportunity for Infill (Keep Existing Uses)	Expressed Property Owner Interest	
22722 CENTRE DR	38	617-432-03	1-story commercial use in a strip mall setting. One larger banquet hall and 4 smaller retail/office (Avis Rent-A-Car, a pub, massage) with a small, one-aisle parking lot and two driveway entrances on Centre Dr.		Low	X					X
22765 ASPAN ST	39	617-432-18	Commercial/light industrial (America's Tire). Alleyway on Aspan St borders northern section of site and leads to other auto-related uses (Map Reference Number 40), cars being repaired parked along alley.		Low	X					X
22741 ASPAN ST	40	617-432-19	Light industrial uses (auto repair shops). Accessed by alleyway on Aspan St. Cars being repaired parked along alley.		Low	X					X
22859 LAKE FOREST DR	41	617-432-14	This property is a vacant Del Taco restaurant building.	Vacant	Very low	X		X			X
22865 LAKE FOREST DR	42	617-432-25	This property is a vacant office building.	Vacant	Very low	X		X			X
22855 LAKE FOREST DR	43	617-432-13	1 story retail/office/restaurant use (medical, cleaners, dentist, Subway). Sadleback Court shopping mall. Small/Medium parking lot with multiple parking aisles. One (1) space for lease (1,189 sf retail) https://www.loopnet.com/Listing/22855-Lake-Forest-Dr-Lake-Forest-CA/22572454/	1 unit for lease	Low	X		X			X
22831 LAKE FOREST DR	44	617-432-09	1 story retail with small wrap-around parking lot. US Bank with drive-thru and retail/office (chiropractic, window treatment, employment agency).		Low	X					X
ORANGE AVE & WHISLER DR	45	617-241-57	2 story Towing and self-storage		Low	X					X
25142 FRONT ST	46	613-374-08	2 story self-storage		Low						X
23131 ORANGE AVE	47	613-371-01	1 story multi-tenant auto repair/light industrial mini-mall. One (1) unit for lease	1 unit for lease	Low			X			X
23081 ORANGE AVE A	48	613-361-03	1 story multi-tenant auto repair/light industrial		Low						X
25101 FRONT ST	49	613-372-05	Tow yard/auto storage, fenced-in		Low						X
23132 ORANGE AVE	50	613-373-02	Industrial (Ganahl Lumber) parking and operations.		Moderate						X
23132 ORANGE AVE	51	613-373-01	Industrial (Ganahl Lumber) parking and operations.		Moderate						X
23222 OLIVE AVE	52	613-373-06	Industrial/storage (closed to public, storage containers visible)		Low						X
CHERRY AVE & FRONT ST	53	613-373-03	Industrial/storage		Low						X
OLIVE AVE & FRONT ST	54	613-373-02	Industrial/storage (Resource Building Materials)		Moderate						X
23271 CHERRY AVE	55	613-373-01	Industrial/storage (Resource Building Materials)		Moderate						X
23211 CHERRY AVE	56	613-362-04	1 story multi-tenant auto repair and two aisle parking lot		Low						X
25312 JERONIMO RD	57	613-362-02	1 story multi-tenant commercial/light industrial (gym, wood and laminate showroom) with parking lot. One (1) unit for lease (3,400 sf @ 25302 Jeronimo Rd) https://www.loopnet.com/Listing/25302-25332-Jeronimo-Rd-Lake-Forest-CA/24105076/	1 unit for lease	Low	X		X			X



23850 County Hwy S18

1: 23861 EL TORO RD



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Image capture: Mar 2018 © 2021 Google

Google

Street View - Mar 2018



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5: 23831 EL TORO RD



Image capture: Mar 2021 © 2021 Google

Google

Street View - Mar 2021

Map Reference: 000005



Lake Forest, California

6: MERCURY RD & ROCKFIELD BLVD



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Map Reference: 000006



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22999 Centre Dr

8: 23591 ROCKFIELD BLVD



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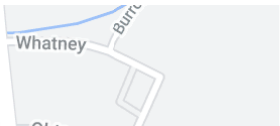
9: 23581 ROCKFIELD BLVD



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Map Reference: 000009



22764 Aspan St

10: 22821 ASPAN ST

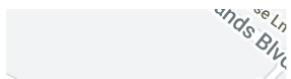


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Map Reference: 000010



22764 Aspan St

11: 22762 ASPAN ST

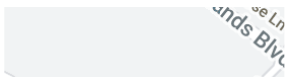


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Google

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Map Reference: 000011



Lake Forest, California

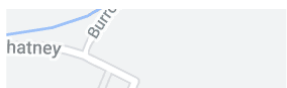
12: 22771 CENTRE DR



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Map Reference: 000012



Lake Forest, California

13: ASPAN ST & CENTRE DR



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Street View - Jan 2021

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ands Biv

Map Reference: 000013



Lake Forest, California

14: 22681 LAKE FOREST DR



Image capture: Mar 2020 © 2021 Google

Google

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Map Reference: 000014



22481 Aspan St

15: 22471 ASPAN ST

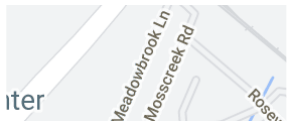


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Map Reference: 000015



Lake Forest, California

16: 20780 LAKE FOREST DR



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20768 Lake Forest Dr

17: 20768 LAKE FOREST DR



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Lake Forest, California

18: 20761 LAKE FOREST DR



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20: 20702 LAKE FOREST DR



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Map Reference: 000020



20672 Lake Forest Dr

21: 20652 LAKE FOREST DR



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22: 20651 LAKE FOREST DR



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Map Reference: 000022



20671 Lake Forest Dr

23: 20671 LAKE FOREST DR

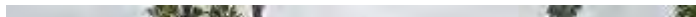


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Map Reference: 000023



Lake Forest, California

24: 26672 TOWNE CENTRE DR



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25: 26642 TOWNE CENTRE DR



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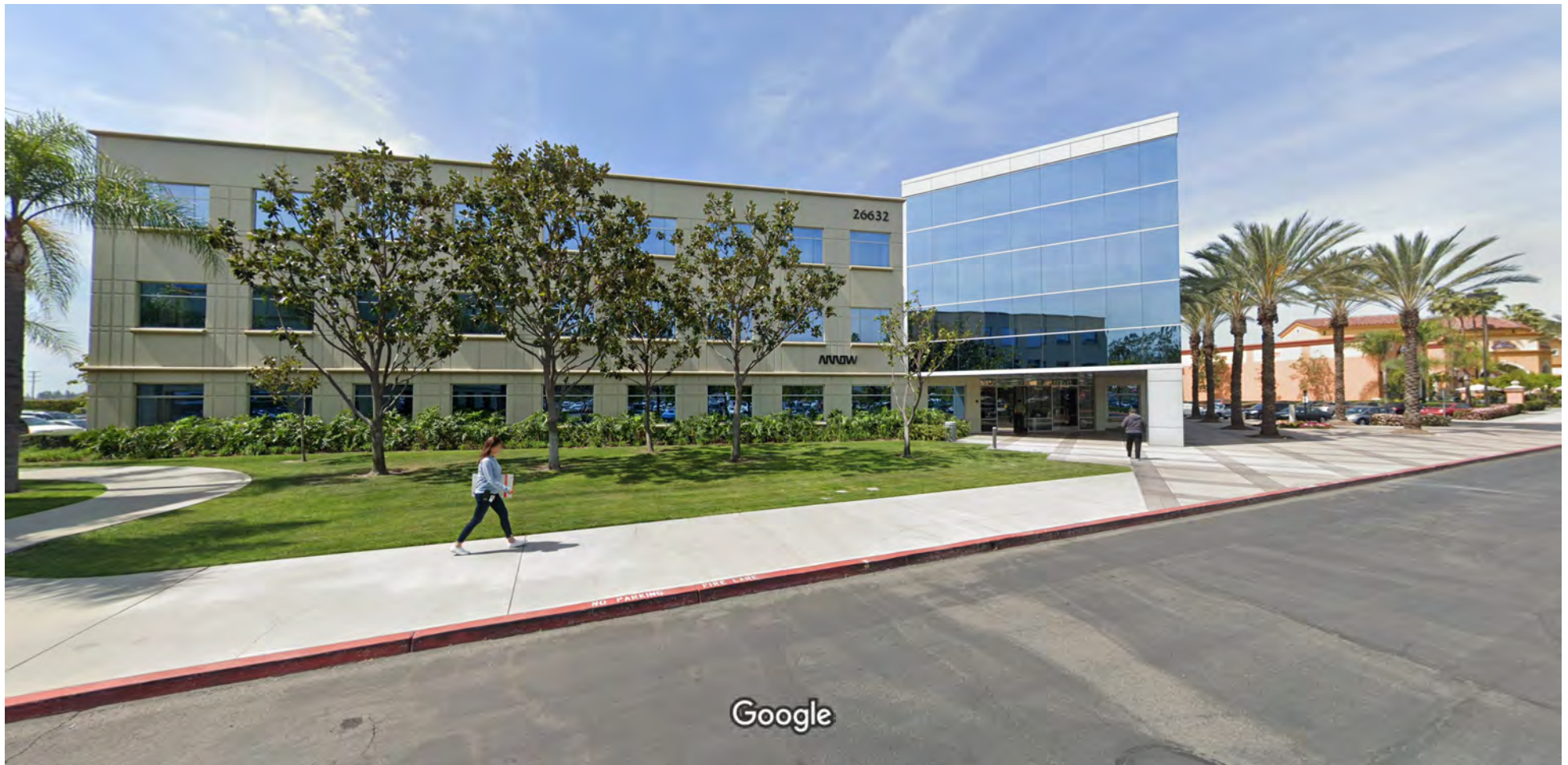


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27: 26622 TOWNE CENTRE DR



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Google

Street View - Apr 2018



Map Reference: 000027



Lake Forest, California

28: 26612 TOWNE CENTRE DR



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Lake Forest, California

29: 26592 TOWNE CENTRE DR



Image capture: Apr 2018 © 2021 Google

Google

Street View - Apr 2018



Map Reference: 000029



Lake Forest, California

30: 26582 TOWNE CENTRE DR



Image capture: Apr 2018 © 2021 Google

Google

Street View - Apr 2018



Map Reference: 000030



Lake Forest, California

31: 26572 TOWNE CENTRE DR



Image capture: Apr 2018 © 2021 Google

Google

Street View - Apr 2018



Map Reference: 000031



Lake Forest, California

32: 26602 TOWNE CENTRE DR



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Map Reference: 000032



Lake Forest, California

33: 26526 TOWNE CENTRE DR



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Lake Forest, California

34: 24288 SWARTZ DR 1



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Google

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22738 Centre Dr

38: 22722 CENTRE DR

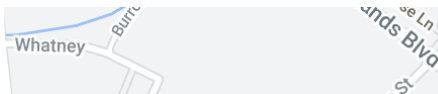


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Map Reference000038



Lake Forest, California

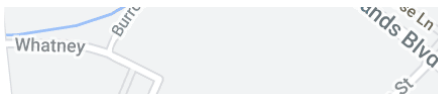
39: 22765 ASPAN ST



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Map Reference000039



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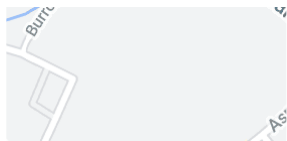
40: 22741 ASPAN ST



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Map Reference000040



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41: 22859 LAKE FOREST DR



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42 : 22865 LAKE FOREST DR



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43: 22855 LAKE FOREST DR



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22798 Aspan St

44: 22831 LAKE FOREST DR



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Lake Forest, California

Google

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Map Reference000045



25101 Front St

46: 25142 FRONT ST



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23160 Orange Ave

47: 23131 ORANGE AVE

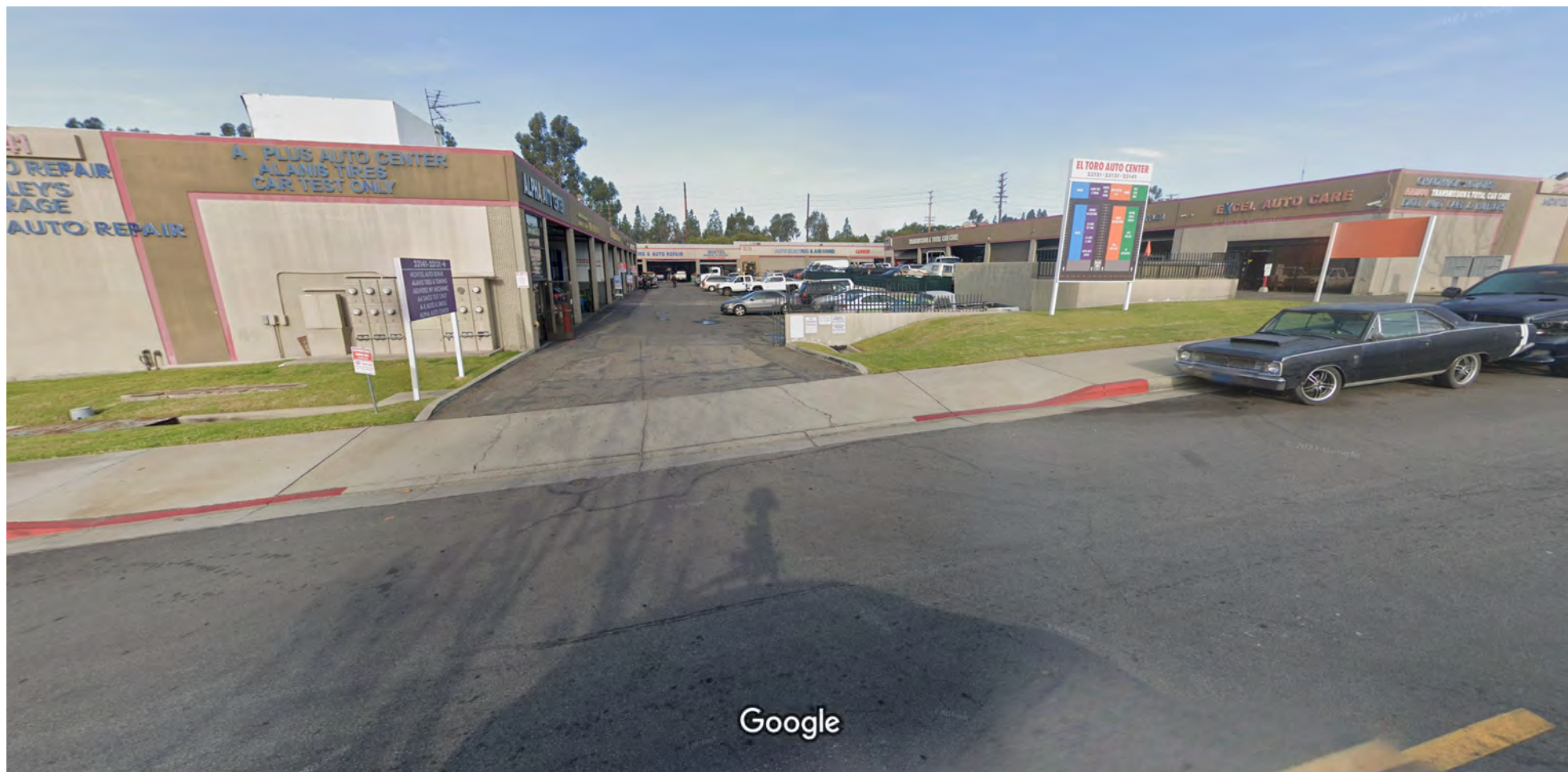
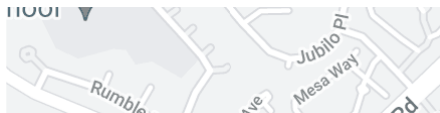


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Map Reference000047



Image capture: Jan 2021 © 2021 Google

Lake Forest, California

Google

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Map Reference000048



25101 Front St

49



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Lake Forest, California

Google

Street View - Jan 2021



23160 Orange Ave

50



Image capture: Jan 2021 © 2021 Google

Lake Forest, California

Google

Street View - Jan 2021



23140 Orange Ave

51

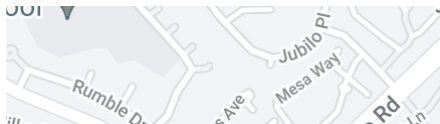


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Map Reference000051



23224 Olive Ave

52: 23222 OLIVE AVE



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Lake Forest, California

Google

Street View - Jan 2021



23281 Cherry Ave

53



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Lake Forest, California

Google

Street View - Jan 2021



23271 Cherry Ave

54



Image capture: Jan 2021 © 2021 Google

Lake Forest, California

Google

Street View - Jan 2021



23271 Cherry Ave

54



Image capture: Jan 2021 © 2021 Google

Lake Forest, California

Google

Street View - Jan 2021



Image capture: Jan 2021 © 2021 Google

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Street View - Jan 2021



25312 Jeronimo Rd

57: 25312 JERONIMO RD



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Lake Forest, California

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Appendix B: Public Engagement Summary

Adopted
January 2022

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Public Engagement Summary

City of Lake Forest Housing Element Update

September-December 2021

In partnership with De Novo Planning Group

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Introduction

The City of Lake Forest is updating its Housing Element as part of the 2021-2029 Housing Element Cycle (Cycle 6). Lake Forest is dedicated to meeting the future housing needs of its residents. The Housing Element Update process is a unique opportunity to connect with residents of Lake Forest and learn more about residents' values, priorities, concerns, and ideas.

While the City's public engagement program connected directly to the Housing Element Update began in late 2020, the City conducted a robust outreach program as part of its comprehensive General Plan Update (which was adopted in mid-2020). As part of that work effort, which included dozens of community meetings, study sessions, and public hearings, the community had the opportunity to weigh-in on key areas for focused future residential and nonresidential growth. Through this effort, the City identified five focus areas where new mixed-use development is desirable. These areas are designated as "Mixed-Use" in the General Plan and the City is currently preparing a focused update to its Zoning Ordinance to adopt new zoning standards for these mixed-use areas. A majority of the sites included in the City's Housing Element Site Inventory (Appendix A) are located within these mixed-use areas. The Housing Element is a continuation of the City's comprehensive General Plan Update and builds upon the legacy of public involvement included in that work, which included focused outreach to the City's lower-income residents through participation of Council-appointed representatives to the General Plan Advisory Committee and pop-up community workshops and events in lower-income neighborhoods of the community. For more information related to the General Plan public engagement program, please see the City's website at <https://www.lakeforestca.gov/292/Planning-Documents>.

Throughout the process, the City supported meaningful public engagement by sending direct advertisements, posting to social media, hosting surveys, facilitating workshops, and sharing summaries of feedback to validate what we heard. Looking forward to the public review period of the Draft Housing Element, the City will continue to engage the community to seek feedback on the goals, policies, and programs included in the Housing Plan as well as input regarding key issues and challenges identified in the Background Report, including the City's plan to accommodate its fair share of future regional housing growth.

The following activities have been conducted in support of the Housing Element Update and are summarized in this document; copies of key advertisements and presentations are included at the end of this document and are also available on the project website at <https://lakeforest.generalplan.org/>.

- General Education and Advertisements
- Project Website
- Virtual Workshop
- Stakeholder Meetings/Consultation
- Public Review of Draft 2021-2029 Housing Element

General Education and Advertisements

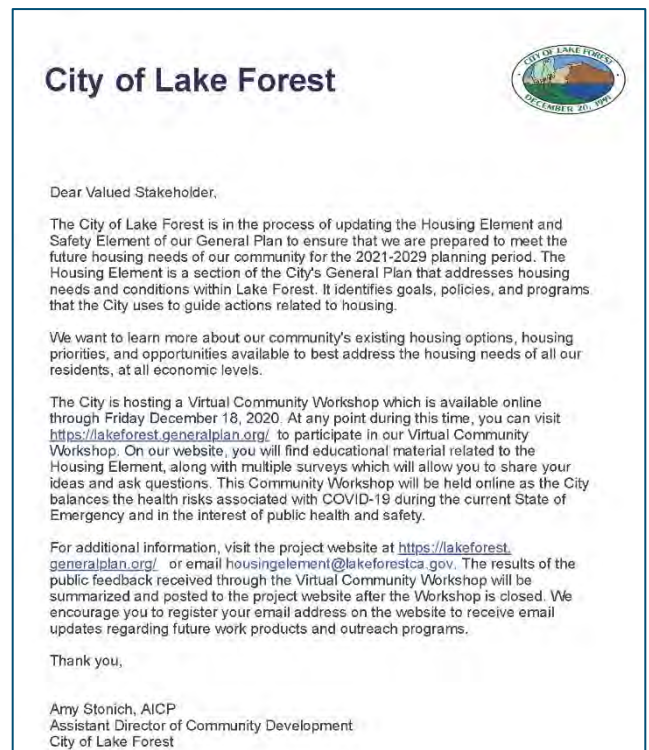
The City engaged in a multifaceted campaign to advertise the focused update to the City's Housing Element to all members of the community, including lower-income households. Using the City's social media accounts, email listserv generated through the General Plan Update, the City's dedicated General Plan Update website and the City's own website, ~~and~~ direct mailers to interested stakeholders, project announcements as part of the City's community services material (delivered to every resident in the City), the City worked hard to educate the community on this project and solicit meaningful feedback from all stakeholders.


Social Media

The City of Lake Forest maintains various social media accounts including Facebook, Nextdoor, and Instagram. Starting in September 2020 and continuing throughout the project, the City posted updates to its social media platforms advertising opportunities to provide input and alerting the public to upcoming meetings and workshops.

Emails

The project team compiled a database of community members and stakeholders who registered to be notified via email of future public engagement opportunities and key deliverables. Direct emails were sent to these individuals to advertise the Housing Element Community Meeting, the Online Workshop, and the Public Review Draft 2021-2029 Housing Element.





CONTACT US

The City is currently preparing a draft Housing Element for public review based on the community's response to our first Virtual Workshop. A draft of the Housing Element will be circulated for public review and during that time the City will hold additional virtual workshops/meetings to collect community feedback.

Please use the "Sign Up" form below to register your email address to be contacted about upcoming outreach events and project materials. You can also contact us by email at housingelement@lakeforestca.gov.

Sign Me Up!

If you would like to learn more about the City's Updates to the Housing and Safety Elements, please complete the information below and click "Sign Up".

* Email


By submitting this form, you are consenting to receive marketing emails from: City of Lake Forest, 100 Civic Center Drive, Lake Forest, CA, 92630, US, <http://lakeforestca.gov>. You can revoke your consent to receive emails at any time by using the [SafeUnsubscribe](#) link, found at the bottom of every email. [Emails are serviced by Constant Contact.](#)

Sign Up!

Select Language ▼

Project Updates

Lake Forest General Plan 2040 Approved by City Council on June 2, 2020.



9

View calendar of meetings and events

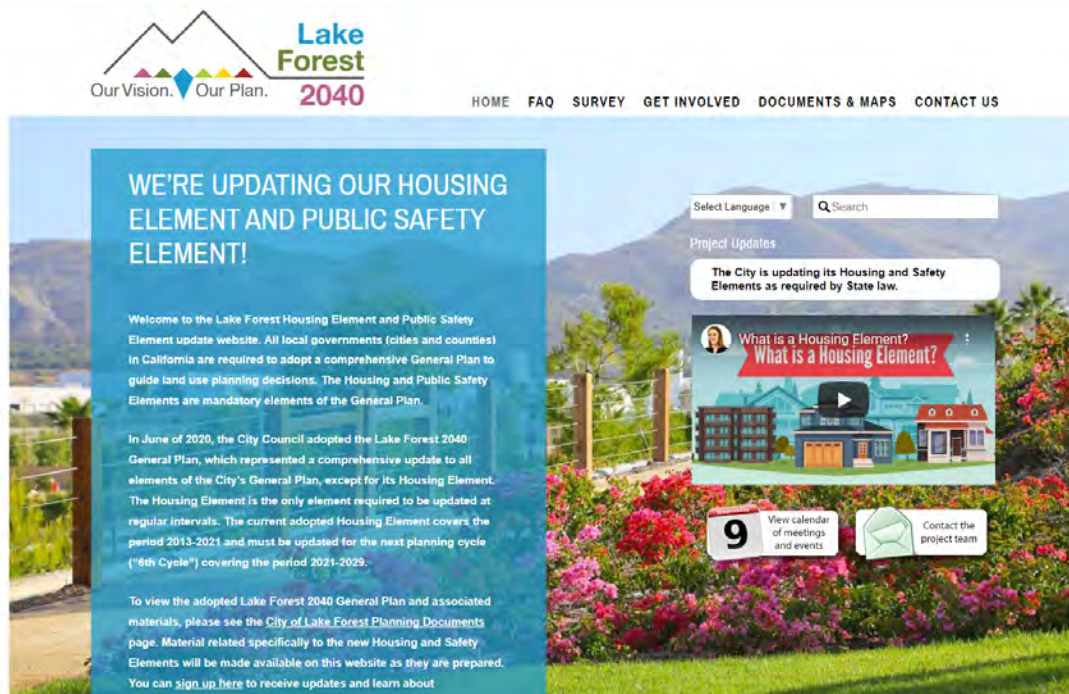
Contact the project team

Project Website

A dedicated project website (<https://lakeforest.generalplan.org/>) serves as the main conduit of information for individuals who can access material online. The project website is a continuation of the General Plan Update website (launched in 2018) and is regularly updated to reflect ongoing community input opportunities, advertise draft work products, and answer commonly asked questions. The project website includes the following pages:

- Home Page: Introduction about the project
- FAQ: A presentation of common questions and answers including an overview of why public feedback is important and how it will be used to shape the work products
- Survey: Dedicated page to host open surveys
- Get Involved: Information regarding upcoming and past meetings and events, including public workshops, open houses, and hearings
- Documents & Maps: Library of relevant documents and maps prepared for the project as well as links to the City's Planning Division webpage which hosts additional City documents
- Contact Us: Project team contact information and a fillable form to submit comments on an ongoing basis and register to receive future project updates

Since September 2020, the project website received over 1,200 views from 959 unique visitors resulting in a total of 2,800 pageviews. The peak of activity happened around the housing survey, facilitated throughout the month of December 2021.



Virtual Community Workshop

As part of the community outreach, a virtual community workshop was conducted to educate the community about housing issues and opportunities facing Lake Forest and gather input on housing-related topics. The virtual workshop was hosted on the project website from November 23, 2020 through December 22, 2020. The extended timeframe was intended to allow community members and stakeholders to participate at their leisure and in accordance with their schedule and availability. The Virtual Community Workshop consistent of three parts:

Part A: [Overview video](#) (narrated in English and subtitled in Spanish) describing Housing Elements and why they are important

Part B: PowerPoint presentation describing existing conditions in Lake Forest and the City's Housing Element Update process (<https://youtu.be/c-LAnI2MGWc>)

Part C: Two surveys to gather information on housing-related issues. Survey #1 focused on issues of home maintenance, affordability, home types, and living conditions in Lake Forest as well as demographic questions. Survey #2 focused on community priorities related to housing. This section includes a summary of the responses received and the general themes that emerged.

- Survey #1 was 14 questions long. It had a 94% completion rate and 124 total responses.
- Survey #2 was 2 questions long. It had an 87% completion rate and 69 total responses.

Community Survey

The City of Lake Forest is updating its Housing Element as part of the 2021-2029 Housing Element Cycle (Cycle 6). The City recently updated its General Plan (2020); updating the Housing Element builds upon that foundation of analysis and community engagement to address the future housing needs of its residents. The Housing Element Update process is a unique opportunity to connect with residents of Lake Forest and learn more about residents' values, priorities, concerns, and ideas.

As part of the community outreach, a virtual community workshop was conducted and two surveys were presented. The two surveys work together to gather information on housing-related issues. Survey #1 focused on issues of home maintenance, affordability, home types, and living conditions in Lake Forest as well as demographic questions. Survey #2 focused on community priorities related to housing. This report is a summary of the responses received and the general themes that emerged.

Both surveys were posted to the website on November 23, 2020 and were open for a month. The surveys were closed on December 22, 2020.

Survey #1 was 14 questions long. It had a 94% completion rate and 62 total responses.

Survey #2 was 2 questions long. It had a 69% completion rate and 49 total responses.

Executive Summary



48% of residents chose to live in Lake Forest for its affordability



86% of residents are very satisfied or somewhat satisfied with their current housing situation



45% of residents chose to live in Lake Forest for its proximity to work, job, family, or friends



28% of residents and 33% of non-residents want to buy in Lake Forest but cannot afford it



55% of residents would rate their housing as being in excellent condition, while 39% rated it as showing signs of minor deferred maintenance



44% of residents think Lake Forest needs more condominiums

Issues that residents rated as most important to them include:



Support fair/equitable housing opportunities (100%)



Support programs to maintain and secure neighborhoods that have suffered foreclosures (100%)



Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs (97%)



Housing affordable to working families (94%)



Rehabilitate existing housing (94%)

Survey #1: Respondent Demographics

The survey contained 7 questions related to demographics. The first question of the survey was, “Do you live in Lake Forest?”¹ Approximately 47% of respondents answered, “No.” Given the large number of responses that came from non-residents on a survey meant to ascertain information about residential conditions and attitudes towards housing within the City, the results from residents and non-residents are analyzed separately in this Community Survey Report. Non-residents also skipped large portions of the survey (which would be expected since the questions are largely non-applicable to non-residents). As such, unless otherwise noted, all survey results reported are from the sample of resident responses (33 in total for Survey #1 regarding housing conditions).

Of the other six demographic questions asked, one of those questions included an opportunity for users to sign-up for more information about the Housing Element update process. The other five questions highlighted the following about the respondents:

- Of those individuals who live in Lake Forest, approximately 64% have lived here for 10+ years. The next highest response (27%) was 5-10 years, followed by 2-5 years (9%).²
- Most of the respondents own their own home (79%), with 21% of respondents renting.³
- Most of the respondents (79%) live in a single-family home, with the next highest category being multi-family homes (15%), followed by duplex/attached homes (5%) and mobile homes (5%).⁴
- Of the respondents surveyed, the most common types of households include couples (33%), couples with children younger than 18 (24%), and single-person households (21%). There was considerable range in household types including 9% who identified as an unlisted household type, such as couples with adult children living with them.⁵
- The respondents were primarily 56-74 years old (36%), followed by 40-55 years old (30%), and 24-39 years old (18%).⁶

¹ Question 1: Do you live in Lake Forest?

² Question 2: How long have you lived in the City?

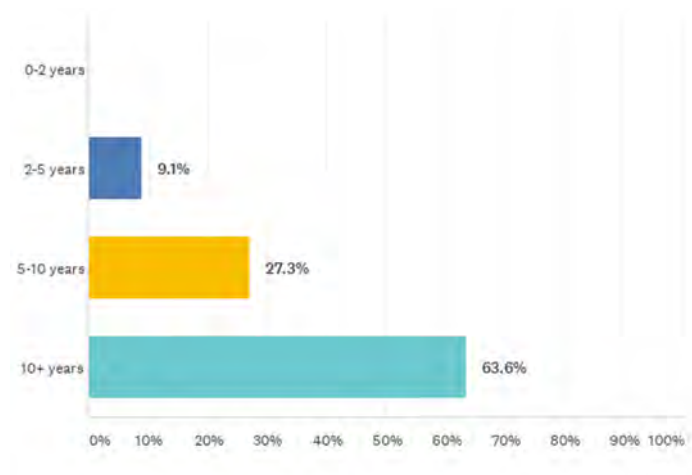
³ Question 4: Do you currently own or rent your home?

⁴ Question 5: Select the type of housing that best describes your current home.

⁵ Question 9: Which of the following best describes your household type?

⁶ Question 14: What age range most accurately describes you?

Figure 1: How long have you lived in the City?



Survey #1 Responses

The survey responses reveal information about housing in Lake Forest. The results are grouped into four categories: values and priorities; housing affordability; housing maintenance; and housing fit.

VALUES AND PRIORITIES

When respondents were asked, “What made you decide to live here?”⁷ the most common answers were:

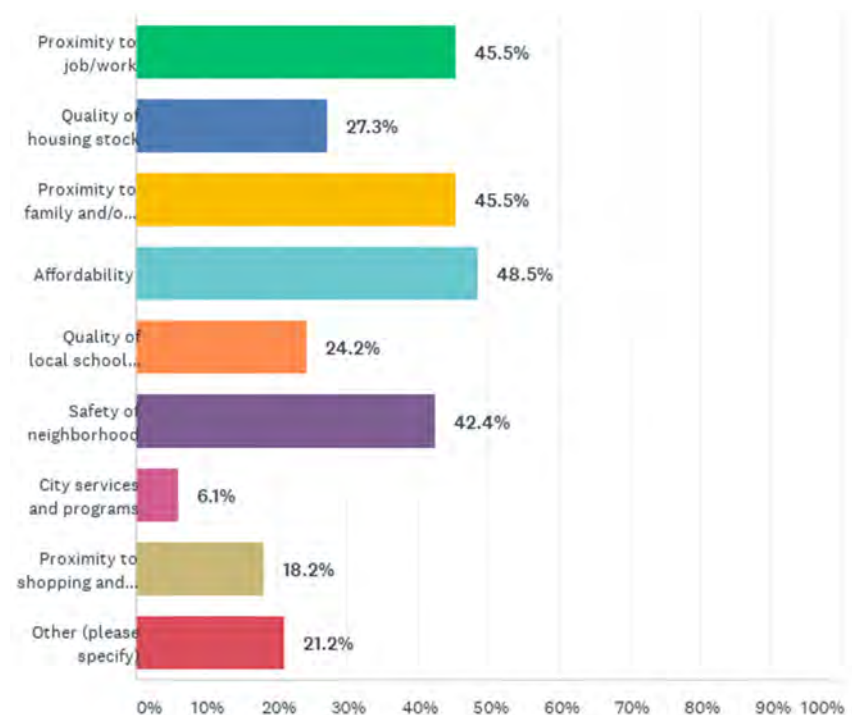
- Affordability (48%)
- Proximity to job/work (45%)
- Proximity to family and/or friends (45%)
- Safety of neighborhood (42%)
- Quality of housing stock (27%)
- Quality of local school system (24%)
- Other (27%)
- Proximity to shopping and services (18%)
- City services and programs (6%)

Some of the other responses included:

- Living with family
- Smaller town atmosphere with lower density and some breathing room
- The view from our house
- Proximity to parks, trails, and other outdoor opportunities
- Quiet neighborhood

⁷ Question 3: What made you decide to live here?

Figure 2: What made you decide to live here?



HOUSING AFFORDABILITY

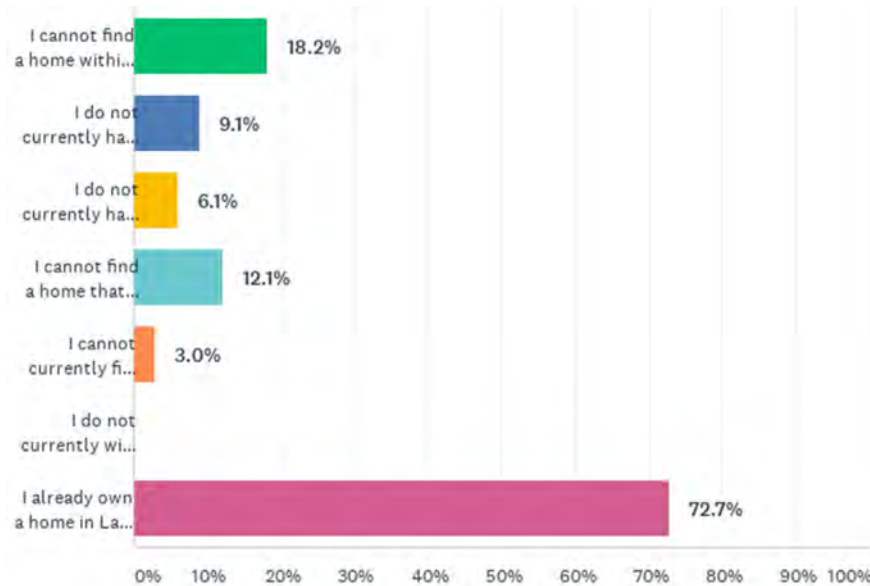
When respondents were asked, “If you wish to own a home in Lake Forest but do not currently own one, what issues are preventing you from owning a home at this time?”⁸ those who do not already own a home responded:

- I cannot find a home within my target price range in Lake Forest (18%)
- I cannot find a home that suits my living needs in Lake Forest (housing size, disability accommodations) (12%)
- I do not currently have the financial resources for an appropriate down payment (9%)
- I do not currently have the financial resources for an adequate monthly mortgage payment (6%)
- I cannot currently find a home that suits my quality standards in Lake Forest (3%)

⁸ Question 10: If you wish to own a home in Lake Forest but do not currently own one, what issues are preventing you from owning a home at this time? (Select all that apply)

Over 70% of Lake Forest residents who responded to this question already owned a home in Lake Forest. None of the residents expressed the opinion that they do not wish to own or rent in Lake Forest.

Figure 3: If you wish to own a home in Lake Forest but do not currently own one, what issues are preventing you from owning a home at this time?



When the responses of non-residents were compared, the following differences occur:

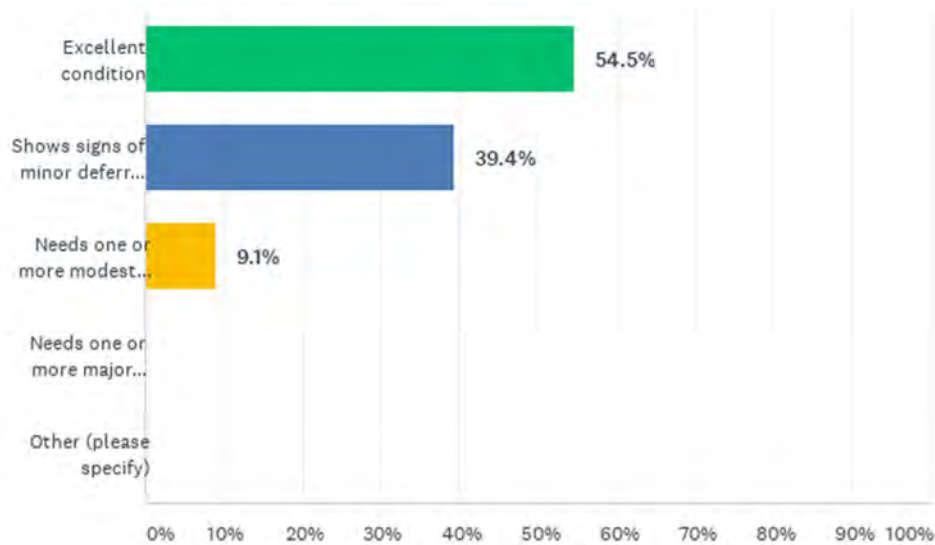
For those who do not currently live in Lake Forest, 67% responded that they do not currently wish to own or rent a home within the City. Additionally, 33% of non-residents responded that they cannot find a home within their target price range in Lake Forest, and 4% responded that they do not currently have the financial resources for an appropriate down payment.

HOUSING MAINTENANCE

When respondents were asked, “How would you rate the physical condition of the residence you live in?”⁹ more than half of all respondents answered positively, with the response “excellent condition” receiving 55%.

⁹ Question 7: How would you rate the physical condition of the residence you live in?

Figure 4: How would you rate the physical condition of the residence you live in?



Approximately 40% of respondents answered that their residence showed signs of minor deferred maintenance such as peeling paint or chipped stucco. No respondents indicated that their home needed one or more major repairs, which is generally consistent with the home maintenance issues related to the City’s relatively young housing stock.

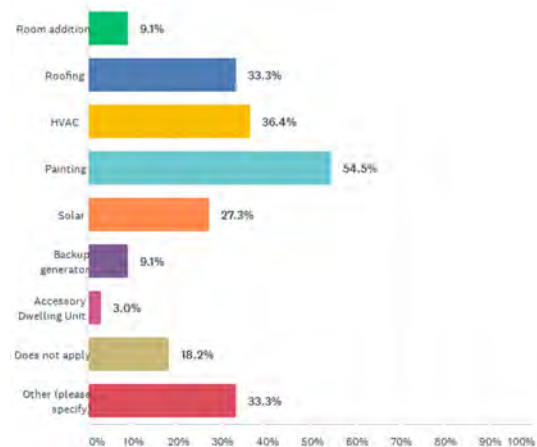
When asked, “Which of the following housing upgrades or expansions have you considered making on your home?”¹⁰ the top responses included:

- Painting (55%)
- HVAC (36%)
- Roofing (33%)
- Other (33%)
- Solar (27%)

The other responses included: landscaping, kitchen or bathroom remodels, plumbing, and other maintenance related to the interior of the home.

¹⁰ Question 8: Which of the following housing upgrades or expansions have you considered making on your home?

Figure 5: Which of the following housing upgrades or expansions have you considered making on your home?



HOUSING FIT

When asked, “How satisfied are you with your current housing situation?”¹¹, over 90% of respondents indicated that they were very satisfied or somewhat satisfied with their current housing. The top responses were:

- I am very satisfied (61%)
- I am somewhat satisfied (30%)
- I am somewhat dissatisfied (9%)
- I am dissatisfied (6%)

Some of the explanations as to why respondents were dissatisfied include:

- The city is growing too fast for the infrastructure (i.e. roadways, etc.)
- Have outgrown current type of housing, but single-family homes in the area are too expensive
- Want to buy a condo, but cannot find one
- Too much traffic-related noise
- On a fixed-income and worried about rising housing costs

¹¹ Question 6: How satisfied are you with your current housing situation?

When asked, “Do you think that the range of housing options currently available in the City of Lake Forest meets your needs?”¹² respondents answered:

- Yes (59%)
- No (41%)

While more than half (59%) of resident respondents answered that there were a sufficient range of housing options currently available in the City, non-residents answered this question nearly the exact opposite. Fifty-eight (58%) of non-residents stated, “No,” while only (42%) of non-residents stated, “Yes.” This shows a fairly even division of opinions on the matter.

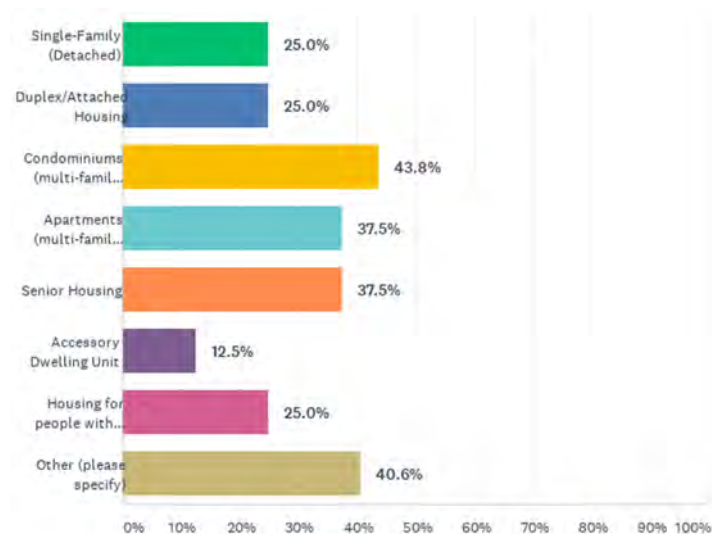
When asked, “What types of housing are most needed in the City of Lake Forest?”¹³ respondents answered:

- Condominiums (multifamily ownership homes) (44%)
- Other (41%)
- Apartments (multi-family rental homes) (38%)
- Senior Housing (38%)
- Duplex/Attached Housing (25%)
- Housing for people with disabilities (25%)
- Single-family (detached) (25%)

¹² Question 11: Do you think that the range of housing options currently available in the City of Lake Forest meets your needs?

¹³ Question 12: What types of housing are most needed in the City of Lake Forest?

Figure 6: What types of housing are most needed in the City of Lake Forest? (Residents)



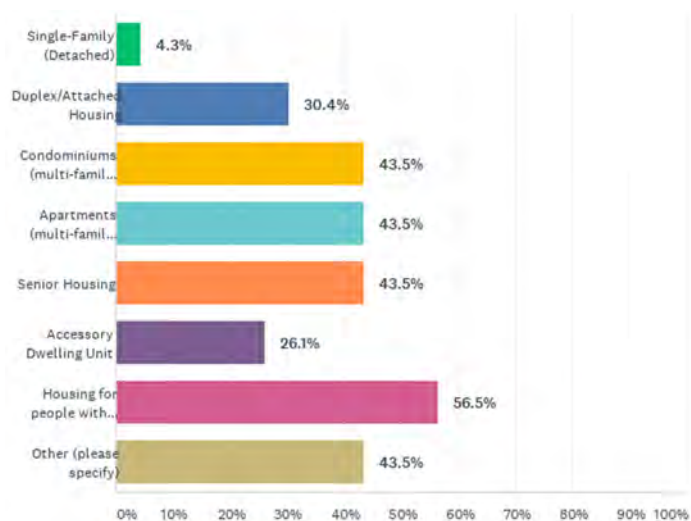
Some of the other responses included:

- Affordable housing including in the low-income and very low-income price ranges
- Handicap accessible housing
- Transition housing for individuals experiencing homelessness
- Single-story single-family homes so individuals can age in place

Non-residents felt differently about the matter. Of non-residents the top responses included:

- Housing for people with disabilities (57%)
- Other (43%)
- Senior Housing (43%)
- Condominiums (multifamily ownership homes) (43%)
- Apartments (multi-family rental homes) (43%)

Figure 7: What types of housing are most needed in the City of Lake Forest? (Non-Residents)



Some of the other responses included:

- Affordable housing
- Homeless housing
- Permanent supportive housing

When asked, “If you are currently employed, approximately how long is your one-way commute to work?”¹⁴ respondents were most likely to reply:

- I am not currently employed (45%)
- 10-25 miles (18%)
- I am employed, but work from home (15%)

These responses, coupled with the age of survey respondents, indicate that a larger percentage of individuals completing the survey are retired. Given the on-going nature of the COVID-19 pandemic, it should be noted that some of those currently employed but working from home may be doing so on a temporary basis. This issue will be explored further as part of the City’s upcoming Community Satisfaction Survey.

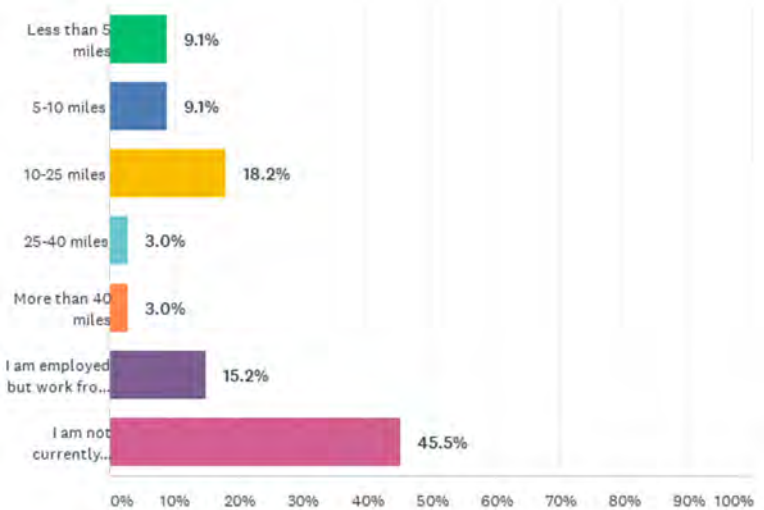
Of non-residents who are employed, the most commonly reported commute distances were 5-10 miles (16%). There were no non-residents who reported commute distances of 25 miles or more

¹⁴ Question 13: If you are currently employed, approximately how long is your one-way commute to work?



which seems to indicate that individuals who work in Lake Forest but live elsewhere live in nearby jurisdictions.

Figure 8: If you are currently employed, approximately how long is your one-way commute to work?



Survey Responses #2

The second survey focused on understanding the relative importance of various housing priorities to the respondent and their family. Of the 49 respondents, 34 responded that they were residents.

When asked, “Do you live and/or work in Lake Forest?”¹⁵ respondents stated:

- Yes (69%)
- No (31%)

Note that if the respondent answered “no,” to this question they were not invited to complete the remainder of the survey; this is because the question relates to prioritization of City resources, and City residents are more directly impacted by how the City elects to spend its resources versus non-residents. This preserves the integrity of the survey questions, but also lowered the completion rate (69%) of the survey. That does mean, however, that 100% of respondents who answered, “Yes” to Question 1, went on to complete the survey.

When asked, “How important are the following housing priorities to you and your family?”¹⁶ the top priorities listed as either “very important” or “somewhat important” were:

- Support fair/equitable housing opportunities (100%)
- Support programs to help maintain and secure neighborhoods that have suffered foreclosures (100%)
- Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs (97%)
- Provide housing affordable to working families (94%)
- Rehabilitate existing housing (94%)

The issue that ranked as the lowest importance were:

- Build more single-family housing (34%)

¹⁵ Question 1: Do you live and/or work in Lake Forest?

¹⁶ Question 2: How important are the following housing priorities to you and your family?

Figure 9: How important are the following housing priorities to you and your family?

	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL
Provide more housing for all income levels	65.63% 21	21.88% 7	12.50% 4	0.00% 0	32
Housing affordable to working families	87.50% 28	6.25% 2	3.13% 1	3.13% 1	32
Build more single-family housing	13.79% 4	20.69% 6	65.52% 19	0.00% 0	29
Build more multi-family housing (apartments, condos, etc.)	37.50% 12	46.88% 15	15.63% 5	0.00% 0	32
Rehabilitate existing housing	29.03% 9	64.52% 20	6.45% 2	0.00% 0	31
Encourage more senior housing	36.67% 11	36.67% 11	26.67% 8	0.00% 0	30
Provide ADA-accessible housing	40.63% 13	37.50% 12	12.50% 4	9.38% 3	32
Provide housing for homeless	59.38% 19	21.88% 7	15.63% 5	3.13% 1	32
Ensure that children who grow up in Lake Forest can afford to live in Lake Forest	63.64% 21	24.24% 8	12.12% 4	0.00% 0	33
Integrate affordable housing throughout the community to create mixed-income neighborhoods	64.71% 22	20.59% 7	14.71% 5	0.00% 0	34
Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs	57.58% 19	39.39% 13	3.03% 1	0.00% 0	33
Support fair/equitable housing opportunities	76.47% 26	23.53% 8	0.00% 0	0.00% 0	34
Support programs to help maintain and secure neighborhoods that have suffered foreclosures	51.61% 16	48.39% 15	0.00% 0	0.00% 0	31

Stakeholder Meetings/Consultation

Throughout preparation of the Public Draft General Plan, the City has engaged directly with community stakeholders working in and around Lake Forest. The City sent a hard copy letter and email to over two dozen stakeholders, including affordable housing developers and advocates, faith-based organizations, and community groups to invite them to consult on the Housing Element Update process. The City met one-on-one with three groups:

- Tapestry, A Unitarian Universalist Congregation/Welcoming Neighbors Home (Tapestry's Initiative to End Homelessness)
- The Kennedy Commission
- Province Group
- Orange County Fair Housing Council

The City was pleased to meet and hear from these organizations as part of the preparation process, and the input received through these meetings was invaluable in helping to plan for and address the City's current and future housing needs.

Public Review of Draft Housing Element

The Public Review Draft 2021-2029 Housing Element was made available to the public on September 22, 2021. The material was posted to the project website and a press release was posted to the City's website and advertised at public hearings and to individuals registered for project notifications. The City is also advertising the Public Review Draft and providing direction on how individuals can provide public comment via its social media challenges and direct letters to stakeholder engaged in housing services in and around Lake Forest.

Interested parties ~~are~~were invited to submit public comments using a fillable comment card available on the project website, provide written comments via mail to City Hall, or email comments to the City's Housing Element Project Manager.

The City ~~will~~hosted a Community Meeting on the Public Review Draft Housing Element on October 7, 2021. The intent of the Community Meeting ~~will~~was ~~be~~ to provide another avenue/opportunity for the public to learn about the Housing Element, provide input, and ask questions. The Community Meeting ~~will~~included a live presentation, and a copy of this presentation ~~will~~was made ~~be~~ available on the project website.

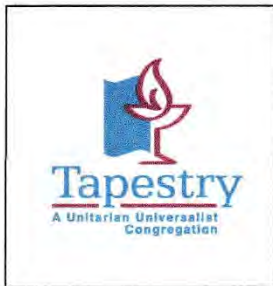
Feedback Influence

The feedback received from the public during preparation of the Housing Element and on the Public Draft Housing Element directly influenced the goals, policies, and programs included in the Housing Plan. Table 1 below summarize how public input is reflected in the Housing Plan.

General Input Received	Applicable Reference			
	Goal	Policy	Program	Other
There should be more affordable housing choices for people who want to live in Lake Forest, including kids who grow up in Lake Forest (Survey)	<ul style="list-style-type: none">Goal 1	<ul style="list-style-type: none">Policy 1.1Policy 1.2Policy 1.3Policy 1.4	<ul style="list-style-type: none">Program 1Program 4Program 5Program 8	
The City should have a range of housing options to meet different personal preferences (Survey)	<ul style="list-style-type: none">Goal 1	<ul style="list-style-type: none">Policy 1.1Policy 1.3Policy 1.4	<ul style="list-style-type: none">Program 1Program 5Program 7Program 8Program 15	
The City should create additional opportunities for lower cost homeownership (Survey)	<ul style="list-style-type: none">Goal 3	<ul style="list-style-type: none">Policy 3.1Policy 3.2Policy 3.3	<ul style="list-style-type: none">Program 20	

Revise policies to include a requirement for affordable housing (Tapestry)	<ul style="list-style-type: none"> Goal 1 	<ul style="list-style-type: none"> Policy 1.6 Policy 1.7 Policy 1.8 	<ul style="list-style-type: none"> Program 1 Program 5 	
Market available housing sites to housing developers (Tapestry)			<ul style="list-style-type: none"> Program 5 Program 22 	<ul style="list-style-type: none">
Assess current fee structure (Tapestry)	<ul style="list-style-type: none"> Goal 1 	<ul style="list-style-type: none"> Policy 1.5 	<ul style="list-style-type: none"> Program 6 	
Work with County representatives and neighboring cities to address affordable and permanent supportive housing (Tapestry)			<ul style="list-style-type: none"> Program 9 Program 10 Program 11 	<ul style="list-style-type: none">
Implement best planning practices (Tapestry)	<ul style="list-style-type: none"> All 	<ul style="list-style-type: none"> All 	<ul style="list-style-type: none"> All 	
Engage the community from the beginning of the Housing Element Update process (Kennedy Commission)				The City provided early opportunities for public input through the community survey on online comment card. The City continues to make opportunities available through the Community Open House and public review process.
City can help advertise fair housing resources in new ways (OC Fair Housing Council)	<ul style="list-style-type: none"> Goal 4 	<ul style="list-style-type: none"> Policy 4.6 	<ul style="list-style-type: none"> Program 22 	
Consider funding new fair housing programs, as requested by service provider(s) (OC Fair Housing Council)	<ul style="list-style-type: none"> Goal 4 	<ul style="list-style-type: none"> Policy 4.3 	<ul style="list-style-type: none"> Program 21 	

Public Comment: Tapestry



To: Debra Rose, City Manager, Lake Forest
Gayle Ackerman, AICP, Director, Community Development Dept, Lake Forest
Ron Santos, Senior Planner, Community Development Dept, Lake Forest

Date: October 20, 2020

Re: Affordable Housing in Lake Forest

The Welcoming Neighbors Home (WNH) Initiative is a ministry of Tapestry, a Unitarian Universalist Congregation in Lake Forest. We work to serve and advocate for people experiencing homelessness or who are at risk of losing their home. We are very proud of our city and the quality of life it enables us to have. At the same time, we are concerned about the increasing problem of homelessness and the lack of attainable housing for those who are most vulnerable living in our city. We want our local government to attend to the needs of all of its residents. Given Lake Forest's high housing costs and significant shortage of affordable homes, many workers and families, especially those on the lower economic rung, overpay for housing and struggle financially to live and work here.

We compliment the Lake Forest City Council on its recent approval of the National CORE Mountain View project which included a mix of affordable housing and supportive housing. We believe that much more of this type of housing is needed in Lake Forest. We also believe that integrating affordable housing for people with extremely low, very low, and low-incomes, and providing more housing vouchers or subsidies, will result in a more fair housing market. We were also pleased to see that the City's recently approved Comprehensive General Plan includes housing for High Density and mixed-use units because we believe this will facilitate the development of more affordable housing.

An Overview of Lake Forest and affordable housing

Between 2000 and 2018, median home sales prices in Lake Forest increased 207% while median prices in the Southern California region increased 151%.¹ The time period from 2010 to 2019 was also one of intense growth for the city, including building over 3,000 new homes on over 800 acres of land.

In order to better understand the issues of affordable housing in Lake Forest, our WNH team reviewed the 5th Cycle² Regional Housing Needs Assessment (RHNA) results.³ We learned that Lake Forest has not met its 5th Cycle RHNA requirements of building 1097⁴ affordable units for very low income (VLI) and low income (LI) residents. Only 57 affordable (VLI and LI) homes were built over 7-8 years. It was disappointing to realize that this limited building has satisfied only 5% of the RHNA requirements, leaving a 95% gap in affordable homes built. However, during this same time period, 2625 homes were added for Above Moderate Income (AMI) residents —achieving 232% of the RHNA requirements. Only 204 Moderate income (MI) homes were built reaching 41% of the RHNA targets.

This year Lake Forest's 6th Cycle RHNA has increased building requirements in the amount of 1,494 in the very low and low-income categories. This is 46% of the total of 3,229 homes. This means that on average 187 housing units per year will need to be developed over the 8-year 6th Cycle for people with lower incomes.

The WNH team also reviewed some of Lake Forest's current housing development policies and processes and the 6th Cycle RHNA requirements. With the perspective we gained, we then developed a brief summary report, "Lake Forest and Affordable Housing". Our report is enclosed in this letter. In it we offer some observations and recommendations that we believe may help Lake Forest increase its success rates for building much needed affordable housing going forward. We believe this will result in a more well-rounded and fair housing market in Lake Forest.

¹ SCAG, Local Housing Data for the city of Lake Forest, August 2020, page 12

² 2014-2019

³ As our report was being finalized, we became aware of two new pending projects from late 2019 that did not appear on the Cycle 5 update: Teresina (85 units) and Nakase. (planned 101affordable senior units in addition to market units). When data is available, whether Cycle 5 or Cycle 6, data review can be updated.

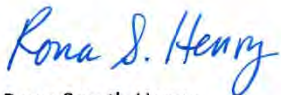
⁴ 647 for VLI, 450 for LI, Lake Forest Annual Progress Report for 2019, p.13, Table B

We understand that you are now developing the Housing Element for the 6th RHNA cycle (2021-2029), and that public comments are welcome during your process. **Please accept this letter and the accompanying report as part of the public comments process.**

Given the importance of the 6th Cycle Housing Element, Welcoming Neighbors Home would like the opportunity to begin a dialogue with the City. We would like to discuss how we can partner with City staff and Housing Element consultants to ensure that the 6th Cycle Housing Element includes specific policies that will result in new affordable homes, particularly for extremely low-, very low- and low-income working families. **We are also very interested in participating in a Lake Forest advisory/working group to provide input on the development of the city's 6th Cycle Housing Element.**

We look forward to learning more about Lake Forest's 6th Cycle Housing Element. We hope to follow-up with you or your staff sometime soon to answer any questions you have about our report and to better understand how the planning process will proceed. In the meantime, if you have any questions, please free to contact Rona Henry at WelcomingNeighborsHome@gmail.com or phone her at 609-216-1784.

Sincerely,



Rona Smyth Henry
Chair, [Welcoming Neighbors Home Initiative](#)
Tapestry, a Unitarian Universalist Congregation
Lake Forest, CA



Reverend Kent Doss
Minister
Tapestry, a Unitarian Universalist Congregation
Lake Forest, CA

Cc: Mayor Neeki Moatazedi
Mayor Pro Tem Mike James
Councilmember Mark Tettermer
Councilmember Scott Voights
Councilmember Dwight Robinson
Beth Thompson, De Novo Planning Group
Ben Richie, De Novo Planning Group
Cesar Covarrubias, Executive Director, Kennedy Commission

Planning Commission Chair Francisco Barajas
Planning Commission Vice Chair Jolene Fuentes
Planning Commissioner Mark Armando
Planning Commissioner Terence Carney
Planning Commissioner Thomas Ludden
Amanda Tropiano, De Novo Planning Group



Lake Forest and Affordable Housing Review and Recommendations

Submitted by
Welcoming Neighbors Home,
a Ministry of Tapestry Unitarian Universalist Congregation

Observations

Lake Forest achieved only 5% of its affordable housing requirements for building very low income (VLI) and low income (LI) homes, under the 5th Cycle Regional Housing Needs Assessment (RHNA) through 2019.¹

However, the City recently took two important steps toward its commitment to improving the availability of affordable housing.

In August of 2020, the City Council approved the National CORE Mountain View project which included a mix of 70 units of affordable housing and supportive housing. And in September of 2020, the City approved the 2040 Comprehensive General Plan which includes housing for High Density and mixed-use units, creating more opportunity for affordable housing.

In our review, Welcoming Neighbors Home (WNH) found that the City's existing policies and program strategies as used in the 5th RHNA Cycle will benefit from further evaluation and updating with current best practices. We hope that our recommendations here will assist Lake Forest in meeting its future goals for affordable housing and in reaching RHNA requirements.

¹Lake Forest Housing Needs Allocation Progress: 2014-2019, supplied by the Kennedy Commission



1) History of Lake Forest's rapid growth

- a. Between 2000 and 2018, median home sales prices in Lake Forest increased 207% while median prices in the Southern California region increased 151%.²
- b. The time period from 2010 to 2019 was also one of intense growth for the City.
- c. The City Council began planning for new Lake Forest community development in 2008, obtaining over \$100 million in public funds.
- d. After several years of study, the City Council approved a General Plan Amendment and zone changes for approximately 800 acres of land, ultimately building over 3000 new homes.
- e. Some incentives were created at that time for market rate developers in order to facilitate the building of affordable housing.³
- f. An "Opportunities Study Environmental Impact Report" was also completed.
- g. This comprehensive planning and funding paved the way for the housing projects mentioned in this report, which were constructed during the 5th RHNA cycle.

Review and Observations of 5th Cycle Housing Element

1) Lake Forest has not yet met its 5th Cycle RHNA goal of 1097 VLI and LI affordable units^{4 5}

- a. Under the 5th RHNA Cycle (2013-2019), 1097 units of VLI and LI housing were required, divided into 647 VLI homes and 450 LI homes.⁶
- b. Only 57 affordable VLI and LI homes were permitted for building, over a seven-year period.
- c. This is only 5%⁷ of affordable housing required under RHNA, a 95%⁸ shortfall in the number required.
- d. However, during this same time period, 2625 homes were added for Above Moderate Income (AMI) residents—achieving 232% of the RHNA requirements. In addition, 204 Moderate income (MI) homes were built, reaching 41% of the RHNA targets (see table below).

² SCAG, Local Housing Data for the City of Lake Forest, August 2020, page 12

³ Lake Forest Developer Agreements with attached Affordable Housing Implementation Plans

⁴ As our report was being finalized, we became aware of two new pending projects from late 2019 that did not appear on the Cycle 5 update: Teresina (85 units) and Nakase. (planned 101 affordable senior units in addition to market units). These 2 developments are not included in our data review. When official data is available, data review can be updated.

⁵ The Arroyo Project, with 189 affordable units, appeared to be completed in 2015. It is our understanding that it was permitted before the start of the 5th Cycle, and that is why it does not appear in that data.

⁶ Lake Forest Annual Housing Element Progress Report for 2019. p.13, Table B

⁷ $57/1097 = 5\%$

⁸ $1040/1097 = 95\%$



Housing Needs Allocation Progress: 2014-2019 ⁹

Income Level		RHNA	2014	2015	2016	2017	2018	2019	Total Units to Date	Remaining RHNA	Percentage to RHNA
Very Low	Deed	647	0	0	0	0	0	32	32	615	5%
	Non-deed		0	0	0	0	0	0			
Low	Deed	450	0	0	0	0	0	25	25	425	6%
	Non-deed		0	0	0	0	0	0			
Moderate		497	145	48	8	2	1	0	204	293	41%
Above Moderate		1,133	688	461	489	749	237	1	2625	-1,491	232%
Total RHNA		2,727	833	509	497	751	238	58	2,886		

2) Lake Forest housing projects built under 5th Cycle Housing Element:

- a. Baker Ranch
 - i. 3000+ homes planned.
 - ii. Planned, projected affordable units: 455 VLI and LI¹⁰ units.
 - iii. 0 affordable permits issued.
 - iv. In-Lieu fees paid, but the amount is not publicly available.
- b. Serrano Summit¹¹
 - i. Approximately total 900+ homes were planned.
 - ii. Projected affordable units: 608 VLI & LI homes.¹²
 - iii. 0 affordable permits issued.
 - iv. Unclear if In-Lieu fees were paid.

⁹ Table obtained from The Kennedy Commission

¹⁰ Table H-31 p. 40, Lake Forest Housing Element 75% built, Baker Ranch is estimated at 455 units (640-185 = 455)

¹¹ 56.2 acres within Serrano Summit will be devoted to medium density residential uses, Lake Forest Developer Agreements and attached Affordable Housing Implementation Plans

¹² Table H-31, p. 40 of Housing Element. "Justification for Serrano Summit" all units can be credited against the lower income RHNA



c. Portola

- i. Total 930 units planned.
- ii. Projected, planned affordable units: 331 VLI & LI homes.¹³
- iii. 57 affordable permits issued.¹⁴
- iv. Portola is the only development site from the RHNA Site Inventory that is building affordable units.

3) Inclusionary Housing Program

- a. Developers are *encouraged*, but not *required*, to have 15% of all units built as affordable.¹⁵
- b. Decisions are made on an individual project basis, as agreed with the developer.
- c. Developers for two of the housing projects discussed here had the option of choosing to pay In-Lieu fees instead of building affordable housing units.¹⁶
- d. It appears these In-Lieu fees were then used as the City's \$3.7M financial contribution for building Mountain View. This is the National Core project recently approved by the City Council with 71 units of VLI and LI affordable housing.
- e. Lake Forest uses a point system meant to increase ways that developers can meet the 15% affordable housing goal in their projects.
 - (i) The In-Lieu fee appears to be a base of \$12,000 per unit, as modified by the point system.
 - (ii) The point system seems very thoughtful but is quite complex.
 - (iii) More information needs to be understood about what the total In-Lieu fees paid were that eliminated almost 900+ units of affordable housing for VLI and LI residents.
 - (iv) It is not clear if the current In-Lieu structure creates the appropriate compensation funding so that the City can incentivize building the omitted affordable units of elsewhere.
- f. It appears that negotiations and concessions to developers worked to eliminate the commitment as outlined in the Cycle 5 Housing Element to use these developments to meet RHNA requirements for VLI and LI.
- g. Lake Forest did not activate a sufficient back-up plan to build these RHNA required units elsewhere.¹⁷

¹³ Lake Forest Developer Agreements with attached Affordable Housing Implementation

¹⁴ Portola Center is a 195-acre site which includes 57 affordable senior units, Lake Forest Developer Agreements and attached Affordable Housing Implementation Plans

¹⁵ Lake forest Housing Element, Policy 1.8 p. 72; private conversation with city staff

¹⁶ Lake Forest Developer Agreements and attached Affordable Housing Implementation Plans

¹⁷ The new Mountain View development approved in September 2020 did authorize 70 affordable units, including 12 PSH. This is a real accomplishment. However, it has not yet been included in RHNA data, so it is excluded from data analysis in this study.



4) Inclusionary Zoning

- a. In the 5th Cycle Housing Element Lake Forest used three large development sites to support the assertion that it had enough available sites to comply with the required RHNA goals of 1097 VLI and LI housing units.
- b. However, most of the planned low-income housing was eliminated from the developer agreements and the final build. This resulted in an almost complete collapse of Lake Forest's commitment to build the number of low-income affordable income homes as proposed in the 5th cycle.
- c. *So, even though significant inclusionary zoning was proposed as part of the 5th Housing Element, the developments as built failed to achieve the goal.*

5) Density Bonus

- a. A density bonus allows for increased development density in excess of existing limits if affordable housing is included in a project. It can create a better overall cost model as an incentive to build more units.
- b. In the three projects under discussion, the density bonus option was specifically waived by developers, as noted in available developer agreements.¹⁸ This appears to have been a sign that inclusionary housing needs would not be seriously considered in the project development.

6) Donation of Land

- a. Baker Ranch had the option to donate 6 acres in-Lieu of affordable housing with a permanent restriction on affordable housing.
- b. Portola Center has no land donation option in agreement.
- c. The Serrano Summit agreement did not have any land donation.

7) Easing governmental and other constraints for market rate developers ¹⁹

- a. Lake Forest did change some of its internal city processes in the 5th Cycle to streamline and expedite the permitting process and the design review.
- b. High density and mixed-use zoning is now used.
- c. The program includes case-by-case flexibility, if rezoning is required.

¹⁸ Lake Forest Developer Agreements with attached Affordable Housing Implementation Plans

¹⁹ Lake Forest Developer Agreements with attached Affordable Housing Implementation Plans



Recommendations for 6th Cycle Housing Element

1) Revise current Policy 1.8 to include a requirement for affordable housing.

- a. Policy now reads: “Encourage residential developments to incorporate a minimum of 15% affordable units, including units affordable to extremely low-income households.”
- b. Without a mandate, affordable housing can be overlooked or ignored.
- c. Strongly suggest Lake Forest strengthen its ordinances to require incorporation of inclusionary housing that includes *all* below market income levels in sufficient numbers to meet RHNA requirements.²⁰ Under current 6th Cycle RHNA requirements, this is 187 units per year on average for people with lower incomes.
- d. Suggest that the City ensure clear accountability in the internal planning and development process to ensure that projects that do not appropriately contribute to RHNA targets are carefully documented and reviewed by the Planning Commission.

2) Strengthen the process and the results of the City’s Inclusionary Housing program

- a. Lake Forest will need to make some significant changes in approach for developing the 6th Cycle Housing Element, especially in the area of meeting RHNA requirements for VLI and LI housing.
- b. The 6th Cycle new RHNA target requirements includes 1,494 VLI and LI units – a 36% increase over the prior cycle. With new housing laws in effect that hold cities much more accountable in achieving RHNA goals, Lake Forest will need to create a much stronger Housing Element plan to meet the needs of these disadvantaged income groups.
- c. In the recently approved 2040 General Plan, it appears that the City has taken a very proactive approach to creating more opportunity for low income housing over the next twenty years.
 - i. Planned housing includes 620 units zoned for High Density (at 25 to 40 du/ac), 7,467 mixed-use units (at 43 du/ac) and 3,265 mixed-use units (at 60 du/ac).
 - ii. It appears that this planning could allow for sufficient housing units to meet RHNA requirements over the 6th Cycle.

²⁰ Currently, Lake Forest’s 6th Cycle RHNA has increased building requirements in the amount of 1,494 in the very low and low-income categories. This is 46% of the total of 3,229 homes. This means that on average 187 housing units per year will need to be developed over the 8-year 6th Cycle for people with lower incomes.



- iii. Many of these sites should be included in the Housing Element Site Inventory so that the needs of below market buyers/renters can be accommodated.
- iv. The City should prepare an in-depth feasibility assessment of the Housing Element sites to provide better information on site suitability to prospective developers.
- v. It will be very important for the City to develop a strong, proactive marketing strategy to attract and engage housing developers at various income levels throughout the 8 year cycle.

3) Assess the current In-Lieu fee structure and explore other options for creating additional funding

- a. In-Lieu fee programs differ widely across cities and counties in California.
 - i) When planners or developers eliminate affordable units from projects, the In-Lieu fees assessed need to be large enough to allow for sufficient fund accumulation to build the required affordable units elsewhere. Often the City can leverage these In-Lieu funds to gain matching financing from other public or private sources in partnership with non-profit developers.²¹
 - ii) The fees also need to be reasonable, in order to not create barriers that prevent developers from building the necessary projects.
 - iii) *We suggest the City use a specialized land-use economic expert to perform the economic analysis needed to determine the cost/benefit of In-Lieu fee options that best fits the City's goal and objectives.*
- b. We recommend that the City work with the Orange County Board of Supervisors and neighboring cities to create a regional local housing bond program to help fund affordable housing and permanent supportive housing.
 - i) Other California cities and counties have taken this approach or are in the process of creating such a program.^{22 23}
 - ii) Other steps that could make building affordable housing more financially feasible and attractive to developers include: increased density bonuses, parking capacity reductions, fee waivers, fast track development processes, building off-site affordable units, land donation, and locating developments near transportation centers.

²¹ This leverage of In-Lieu funds occurred in the Lake Forest Mountain View project

²² The San Diego City Council voted 6-3 to place on the November ballot a \$900 million housing bond that would raise taxes on city property owners to pay for roughly 7,500 subsidized apartments. ... The estimate had ranged from \$500,000 to \$785,000, but now it's \$700,000 to \$1.2 million per ballot measure. San Diego Union Tribune, July 14, 2020.

²³ Los Angeles also has a bond program, known as HHH.



4) Ensure that new 6th Cycle processes take advantage of current best practices and builds on what others have learned

- a. As the urgency of affordable housing needs grows, regulatory oversight will likely continue to be a factor for California cities in their community development. This oversight can include changes through legislative and case law that may require increased accountability for cities and counties.
- b. Recommended best practices continue to evolve as the experience of stakeholders adds to the knowledge base of “what works”.
- c. California public funding opportunities will continue in the 6th Cycle.
- d. The City may find these resources useful in updating its programs and approaches. Both are available online:
 - i) [“Meeting California’s Housing Needs: Best Practices for Inclusionary Housing”](#).²⁴
 - ii) [“Designing Affordability: Innovative Strategies for Meeting the Affordability Gap Between Low Income Subsidy and the Market in High Cost Areas.”](#)²⁵

²⁴ https://www.lgc.org/wordpress/wp-content/uploads/2018/11/inclusionary-factsheet_v2.pdf

²⁵ <https://www.hcd.ca.gov/policy-research/plans-reports/docs/designingaffordability2015.pdf>

**City of Lake Forest Draft Housing Element
Final Response to HCD Findings (Redline Version References)**

The City of Lake Forest has provided the following brief outline to record the City’s response to HCD’s Findings on the Draft 2021-2029 Housing Element. These references are not exhaustive and additional supporting analysis and response to comments may be available in other areas of the Adopted Housing Element beyond those page references listed below.

A. Review and Revision

Finding	Final Page
The element must provide a cumulative evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness)	BR-19 and BR-20

B1. Housing Needs, Resources, and Constraints: Fair Housing

Finding	Final Page
Fair Housing and Enforcement: While the element does include an analysis of trends and patterns related to fair housing enforcement complaints, it must also describe compliance with existing fair housing laws and regulations and include information on fair housing outreach capacity. For additional information, please see pg. 28-30 on HCD AFFH Guidance: https://www.hcd.ca.gov/community-development/affh/index.shtml .	BR-121 through BR-125
Regional Patterns and Trends: While the element includes some regional analysis related to factors such as race and ethnically and racially concentrated areas of poverty (R/ECAP), the element must include regional data and analysis on all fair housing components (e.g., integration and segregation, R/ECAP, access to opportunity, disproportionate housing needs) and analyze that data for patterns and trends.	BR-131 through BR-177
Disproportionate Housing Needs, Including Displacement Risk: The element includes some data on cost burdened, overcrowded, and substandard housing conditions, however the element must analyze this data for patterns and trends over time. Additionally, as noted above, the element should include a regional analysis of disproportionate housing needs. Lastly, the element must include a local and regional analysis of patterns and trends for people experiencing homelessness. With respect to displacement, while the element analyzes displacement risk through examining the city’s affordable housing stock, the analysis must consider other data sources for analysis. For example, according to HCD AFFH data viewer, the City has specific census tracts that have been categorized as “vulnerable to displacement”. The element should incorporate this data and analyze it for trends, patterns, and include appropriate policies and programs.	BR-46 (Homelessness); BR-172 through BR-177 (Disproportionate Housing Needs)
Sites Inventory: While the element analyzed lower-income sites relative most to fair housing components, it must analyze moderate and above moderate	BR-178 through BR-181 (also see

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Finding	Final Page
RHNA sites against all fair housing analysis components and examine whether sites improve or exacerbate fair housing conditions.	updated AFFH Figures)
Other Relevant Factors: The element must include other relevant factors such as changes and barriers in zoning, past redlining practices, restrictive covenants, history of investment and pertinent demographics that contribute to analyzing fair housing issues.	BR-128
Local Data and Knowledge: The element should complement federal, state and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates, public comments, and service providers.	Throughout (e.g., Families Forward on BR-125)
Contributing Factors: The element must identify factors that have contributed, created, perpetuates, or increases the severity of a fair housing condition. The element must also identify actions and programs that are responsive to the contributing factor. Specifically, the element lists land use and zoning laws as a contributing factor; however, the element must indicate what fair housing issues did land use and zoning laws contribute to and how.	BR-190 and BR-191
<p>Programs and Actions: Programs and actions must meaningfully overcome contributing factors and directly address fair housing issues. While the element included several programs for fair housing (e.g., Program 5, 8, 14, 21, 22, 23), these actions do not adequately address the City's fair housing issues. Additionally, while the City does not have any R/ECAPs or census tracts considered "high segregation and poverty." The element did identify the Southeast side of the City to have several overlapping fair housing conditions including low opportunity, high rates of diversity while other census tracts are majority white, and higher levels of cost burdened households. The element should include specific actions or programs that target this community with the goal of conservation and revitalization.</p> <p>Based on the Assessment of Fair Housing (AFH), most of the City is considered a high opportunity area with a white majority. The element should focus on including strong actions that provide new housing choices in areas of high opportunity and enhancing mobility strategies. For examples of programs and actions, please see pg. 72-74 of HCD's AFFH Memo: https://hcd.ca.gov/communitydevelopment/affh/docs/affh_document_final_4-27-2021.pdf</p>	Program 24 (HP-31 through HP-33) targets the community with the goal of conservation and revitalization; BR-180 discusses high opportunity Foothill Ranch Towne Center.

B2. Housing Needs, Resources, and Constraints: Housing Characteristics

Finding	Final Page
Housing Stock Condition: The element analyzed the age of the housing stock, discussed code enforcement data, surveyed community members on housing conditions, and stated that the City's code enforcement and states a very low percentage of the housing stock is in need of replacement. However, the element must explicitly estimate the number of units in need of major rehabilitation or replacement.	BR-30 and BR-31

**City of Lake Forest Draft Housing Element
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B3. Housing Needs, Resources, and Constraints: Sites Inventory

Finding	Final Page
Progress in Meeting the RHNA: The element identifies 1,296 units that have been approved, entitled or under construction for lower and moderate-income households (pg. BR-73). Further, the element states that affordability was based on densities. However, the element must demonstrate affordability through actual or anticipated rents or sale prices or other mechanisms ensuring affordability such as inclusionary requirements or deed-restrictions.	BR-95 through BR-97
Realistic Capacity: The element identifies sites with a mixed-use general plan designation where the base zoning allows for nonresidential uses (commercial, industrial, etc.,). To demonstrate realistic capacity on these sites, the element must analyze and account for the likelihood of residential development in the zones that allow 100 percent nonresidential uses. The analysis should be based on factors such as development trends, performance standards or other relevant factors.	BR-104
Mixed-Use Zoning: HCD understands that while the general plan designations for sites within the mixed-use and urban industrial land use designations are in place, the zoning has not been implemented to approve projects at the densities and uses as identified in the inventory. For your information, if zoning is not in place by beginning of the planning period (October 15, 2021), the element must include a program to commit to adopting the zoning changes. Additionally, for sites that are expected to accommodate the City's lower-income RHNA, programs must commit to housing element rezone requirements pursuant to Government Code section 65583.2 (h) and (i).	BR-100; Program 1 (HP-6)
Suitability of Nonvacant Sites: The element identifies most of its RHNA at all income levels on nonvacant sites. The analysis stated that the City considered various factors when determining sites suitable for development such as ownership patterns, developer or owner interest, existing uses and degree of underutilization. Where applicable, the element should list the actual values for each of the sites to better relate the overall analysis to the sites inventory. Additionally, the analysis should describe why and how these factors demonstrate that these sites are suitable for development. The element could do this by examining current trends of redevelopment and listing past projects that reflect the factors being used.	BR-100 through BR-103
The element must analyze whether existing uses constitute as an impediment for residential uses on the site. The element should include information on whether existing uses are operating, have been operating, or are or not anticipated to continue operating. Currently, the inventory lists most sites as "underutilized commercial;" however the element identifies sites existing uses in greater detail (e.g., strip commercial, retail shopping, grocery store, etc.) The element could also analyze the current existing uses, information on vacancies, the demand for the existing use, past and current development trends, examples of similar existing uses redeveloped into residential at similar densities and affordability as identified in the inventory, and policies and programs that facilitate residential development on nonvacant sites.	BR-100 through BR-102; Appendix A includes new content (description of existing uses on sites, site photos)
The element identifies 374 moderate-income units on an existing project called Saddleback Apartments. The complex was developed at 9 du/ac with 304 units	BR-108

**City of Lake Forest Draft Housing Element
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Finding	Final Page
and the City assumes an additional 374 units will be built during the planning period. However, the element provides no information to support the assumption and solely relies on the fact that the site has not been developed to the maximum capacity. The element must provide additional analysis demonstrating the likelihood of additional development through ownership or developer interest, current market trends, financial feasibility, or other factors.	
Lastly, the element is relying upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. As part of the resolution to adopt the housing element, the City must make findings based on substantial evidence that the use is likely to be discontinued pursuant to Government Code section 65583.2, subdivision (g)(2).	See Resolution
Availability of Infrastructure: While the element examines the availability of infrastructure to accommodate the City's RHNA, the element must discuss planned or existing access to dry utilities.	BR-93
Sites with Zoning for a Variety of Housing Types: Accessory Dwelling Units (ADUs): After a cursory review of the City's ordinance, HCD discovered several areas which were inconsistent with State ADU Law. This includes, but is not limited to, height restrictions, requirement of setbacks for junior accessory dwelling units (JADUs), restricting bedroom count, open space requirements, among others. HCD will provide a complete listing of ADU noncompliance issues under a separate cover. As a result, the element should add or revise a program to update the City's ADU ordinance to comply with state law. For more information, please consult HCD's ADU Guidebook, https://www.hcd.ca.gov/policy-research/accessorydwellingunits.shtml	Program 8 (HP-14)

B4. Housing Needs, Resources, and Constraints: Government Constraints

Finding	Final Page
Land Use Controls: The element must identify and analyze all relevant land use controls as potential constraints on a variety of housing types. The analysis should review land use controls independently and cumulatively with other land use controls. The element should specifically list and analyze requirements related setbacks, lot coverage, minimum lot sizes, height limits, floor area ratios, open space, and any applicable development standards related to housing. The analysis should evaluate how these standards impact the ability to achieve the densities identified in the sites inventory. Additionally, it should discuss any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.	BR-55 through BR-65
Zoning, Development Standards and Fees Transparency: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City's website and add a program to address these requirements, if necessary.	BR-51, Program 1
Residential Care Facilities for Seven or More Persons: Residential care facilities or group homes for seven or more persons appears to be excluded from several zones allowing residential uses and subject to a use permit in the A-1	BR-71 and Program 7

**City of Lake Forest Draft Housing Element
Final Response to HCD Findings (Redline Version References)**

Finding	Final Page
zone. The element should evaluate these requirements as constraints and include programs as appropriate. The element should also discuss any spacing requirements between group homes.	
Reasonable Accommodation: While the element briefly described the City's reasonable accommodation procedure, it must discuss the process for requesting a reasonable accommodation, time and costs associated with the request, and list the actual approval findings and analyze these findings for potential constraints on housing for people with disabilities.	BR-79

B5. Housing Needs, Resources, and Constraints: Nongovernmental Constraints

Finding	Final Page
Permit Times: The element must describe the length of time between project approval and request for a building permit. The analysis should address any hinderances on the jurisdiction's ability to accommodate RHNA by income category and include programs as appropriate.	BR-78
While the element includes some data on farmworkers, it should specifically quantify the number of permanent and seasonal farmworkers at the City or County level (i.e., USDA data) to better understand the broader and unique housing needs of farmworkers.	BR-45

C1. Housing Programs: Sites

Finding	Final Page
<p>As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:</p> <p>Shortfall of Sites: While the jurisdiction identified GP designations to allow for high-density housing to address the RHNA, the element appears to acknowledge that the zoning is not currently in place to implement the GP designations. If so, the City is showing a shortfall of sites to accommodate the RHNA for lower-income households.</p> <p>If a shortfall exists, the element must include a program to specifically commit to acreage, allowable densities, and anticipated units. In addition, to accommodate the housing needs of lower-income households, the program should specifically commit to rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i). Specifically, the program must commit to:</p> <ul style="list-style-type: none"> • permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review 	Program 1 (HP-6).

**City of Lake Forest Draft Housing Element
Final Response to HCD Findings (Redline Version References)**

Finding	Final Page
<p>must not require a Conditional Use Permit, planned unit development permit, or other discretionary review or approval.</p> <ul style="list-style-type: none"> • accommodate a minimum of 16 units per site; • require a minimum density of 20 units per acre; and • at least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need, if those sites: <ul style="list-style-type: none"> ○ allow 100 percent residential use, and ○ require residential use occupy 50 percent of the total floor area of a mixed-use project 	
<p>Program 8 – Accessory Dwelling Units: While the element includes a program to explore ways to incentivize ADUs, it should also commit to revising and adopting an ADU ordinance compliant with state law and monitor trends for ADUs production. Lastly, the program should specify what incentives the City will commit to taking to facilitate the development of ADU within a specified timeframe.</p>	<p>Program 8 (HP-15)</p>
<p>Program 7 – Zoning Code Amendments – Housing Constraints: This Program commits to defining “agricultural worker housing” separate “employee housing” to comply with Health and Safety Code Sections 17021.5, .6, .8. The City should only refer to it as employee housing and not make a distinction between agricultural versus employee housing types.</p>	<p>Program 7 (HP-13)</p>

C2. Housing Programs: Constraints

Finding	Final Page
<p>As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>	<p>Program 6 (HP-12), Program 7 (HP-13)</p>

C3. Housing Programs: AFFH

Finding	Final Page
<p>As noted in Finding B1, the element does not include a complete Assessment of Fair Housing (AFH). Depending on a complete analysis, the element may need to add or revise programs as appropriate. For additional guidance on program requirements to affirmatively further fair housing (AFFH), please see HCD’s guidance at https://www.hcd.ca.gov/community-development/housing-element/housing-elementmemos.shtml.</p>	<p>Addressed fair housing issues and contributing factors for every Program in the Housing Plan (HP-6 through HP-33); see revisions to</p>

**City of Lake Forest Draft Housing Element
Final Response to HCD Findings (Redline Version References)**

Finding	Final Page
	Program 22 and new Program 24

C4. Housing Programs: Affordable Units

Finding	Final Page
Program 15 – Preservation of Affordable Housing Units: While the City’s affordable housing portfolio indicates eleven units at risk of converting to market rate in the next ten years (p. BR-45), the Program only commits to preserving eight of those units. This program should be revised with the goal of preserving all units at risk of converting in the next ten years. Additionally, the Program should commit to coordinating with qualified entities to preserve and maintain affordability of units at-risk of converting to market rate uses and comply with noticing requirements within three years, twelve months, and six months of the affordability expiration date.	BR-37; Program 15 (HP-21)

D. Quantified Objectives

Finding	Final Page
While the element includes quantified objectives for lower-income households, it must also include objectives for the number of units that will be conserved/preserved for moderate and above moderate households.	BR-34

E. Public Participation

Finding	Final Page
The element was made available for public review by the City on September 22, 2021 and subsequently received by HCD on September 23, 2021. As a result, the City made the element available to the public concurrent with its submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD’s ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD’s review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD’s future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City’s consideration of public comments must not be limited by HCD’s findings in this review letter.	Appendix B (updated pp. 3-4, p. 21)

RESOLUTION NO. 2022-01

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LAKE FOREST, CALIFORNIA, ADOPTING THE “2021-2029 HOUSING ELEMENT” OF THE GENERAL PLAN

WHEREAS, the California Government Code requires that cities review and update their Housing Elements every eight (8) years, according to a schedule set forth by the State Department of Housing and Community Development (“HCD”); and

WHEREAS, the Housing Element sets forth the housing policies for the City, facilitates the preservation and development of housing, and establishes programs to accommodate the City's share of the regional housing needs in Southern California; and

WHEREAS, the City of Lake Forest has been assigned an allocation of 3,236 new housing units as its share of the regional housing needs assessment (“RHNA”) in Southern California; and

WHEREAS, in accordance with State Law, the City of Lake Forest has prepared a Draft Housing Element for the 6th Cycle covering 2021-2029 period in accordance with California Government Code Sections 65580-65589.8 attached hereto as Exhibit A; and

WHEREAS, in accordance with Government Code Section 65583, the City finds that the Housing Element (2021-2029) complies with the duty to Affirmatively Further Fair Housing; and

WHEREAS, the Housing Element (2021-2029) complies with the requirements of State law and conforms to the purposes, intent and provisions of all the Elements of the City's General Plan; and

WHEREAS, the Director of Community Development has reviewed the project's potential effects on the environment, and has recommended that the project is categorically exempt from the California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15183 which allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, such as the City's recent General Plan EIR; and

WHEREAS, in preparation of the Housing Element (2021-2029), the City developed a robust Community Engagement Plan with a dedicated website which received over 1,200 views; conducted two online surveys between November 23, 2020, through December 22, 2020, as well as stakeholder interviews with the Kennedy Commission, Welcoming Neighbors Home, and the Fair Housing Council of Orange County; and held a virtual workshop conducted throughout the month of December 2020 to educate the community about housing issues and opportunities and gather input on housing-related topics; and

WHEREAS, on September 23, 2021, pursuant to Government Code section 65585(b)(1), the City submitted the draft 2021-2029 Housing Element to the State of California Department of Housing and Community Development ("HCD"); and

WHEREAS, the California Department of Housing and Community Development must review and provide comments on the Public Draft Housing Element and the City must update the Public Draft Housing Element in response to those comments in order to comply with State Housing Law; and

WHEREAS, on October 7, 2021, the City hosted a public open house event at which the draft Housing Element was shared and feedback was solicited; and

WHEREAS, the City gave notice of the public hearing at which the project would be considered by the Planning Commission by publishing a notice in a newspaper of general circulation on October 21, 2021, and by posting a notice at City Hall and at the Foothill Ranch branch of the Orange County Public Library; and

WHEREAS, on November 4, 2021, the Planning Commission of the City of Lake Forest conducted a public hearing for the purpose of considering a Housing Element update and the Planning Commission reviewed a public review draft for purposes of providing review and program recommendations to staff and adopted a resolution recommending the City Council adopt the Housing Element inclusive of revisions necessary to comply with State Housing Law; and

WHEREAS, the City Council has duly considered all evidence, including the testimony of the City's Consultant, interested parties, and the evaluation and recommendations by staff, presented at said hearing.

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF LAKE FOREST DOES RESOLVE, DETERMINE, FIND AND ORDER AS FOLLOWS:

SECTION 1. CEQA. This project is categorically exempt from the California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15183, which allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, such as the City's recent General Plan EIR. An Environmental Analysis has been prepared to demonstrate this finding attached hereto as Exhibit B.

SECTION 2. The City Council further finds as follows:

- a. Finding: The Draft Housing Element is consistent with the goals and policies of the General Plan.

Fact: The Draft Housing Element is a State-mandated Element of the City of Lake Forest's General Plan. California State Legislation requires that the Housing Element be updated every eight years to adequately plan for the City's housing needs. The Housing Element identifies sites that may accommodate the City's Regional Housing Needs Assessment (RHNA) obligation. As such, the Draft Housing Element is consistent with the goals and policies of the General Plan.

- b. Finding: State law requires the adoption of a Housing Element as part of the General Plan of each municipality and said element shall be updated every eight years.

Fact: The current Housing Element for Lake Forest was adopted by the City Council in January 2014 for the 2014-2021 (5th Cycle) planning period and was certified by the State. Lake Forest has complied with the State mandate to update its Housing Element for the 2021-2029 planning period.

- c. Finding: As required by State law during the preparation of an amendment to the General Plan, the planning agency has provided opportunities for the involvement of citizens, public agencies, civic, educational, and other community groups, though public hearing and other means the city deems appropriate.

Fact: Public involvement has been completed which included the involvement of residents, local housing community, several non-profit housing advocates, and key City staff. The City worked diligently to engage the community in safe and appropriate ways throughout 2020,

during the COVID19 pandemic, when traditional in-person activities were not possible to conduct. This outreach also extended to the General Plan Update which was conducted during pre-COVID-19 protocols and included dozens of community meetings, an open house, and public hearings, where the community had the opportunity to weigh-in on key areas for future residential and non-residential growth. Further, the Planning Commission conducted a public hearing on November 4, 2021.

- d. Finding: The City Council finds that the update to the Housing Element was prepared in accordance with State law and reviewed by the State Department of Housing and Community Development (HCD) as required by the California Government Code.

Fact: The City submitted a copy of the Housing Element on September 23, 2021, to HCD. HCD submitted a review letter to the City on November 22, 2021. Comments received from HCD were addressed and incorporated into the final document for City Council adoption of the Housing Element.

- e. Finding: In accordance with State law, the City Council finds that the existing uses on the nonvacant sites included in the inventory are likely to be discontinued during the planning period.

Fact: City of Lake Forest is essentially entirely built out. There is no vacant unentitled land remaining to accommodate new multifamily residential development. In order to accommodate its fair share of regional housing growth, the City must identify nonvacant sites to accommodate its remaining RHNA for all income levels (not only its lower income requirements). The City has specifically analyzed whether existing uses constitute an impediment for residential uses on the site. Additional information provided in Appendix A Sites Analysis of the Housing Element (Exhibit A attached hereto) demonstrates that existing uses on the sites identified to accommodate a portion of the City's RHNA do not constitute an impediment for residential uses on the site. Additional information regarding current operations and tenants, vacancies, properties listed for rent or sale, the demand for the current use, and contact with property/business owners are included. The City has considered each site individually and has concluded that, based on the substantial evidence provided, current uses are not an impediment to the sites' redevelopment for residential uses (refer to the Suitability of Nonvacant Sites analysis on page BR-100 of Exhibit A).

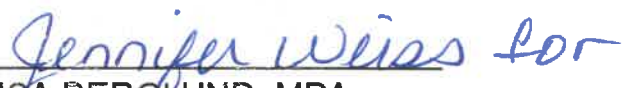
SECTION 3. CITY COUNCIL ACTIONS. The City Council does hereby adopt the Housing Element (2021-2029) inclusive of revisions necessary in order to comply with State Housing Law.

PASSED, APPROVED AND ADOPTED this 4th day of January 2022, by the following vote, to wit:




ROBERT PEQUEÑO
MAYOR

ATTEST:



LISA BERGLUND, MPA
CITY CLERK

APPROVED AS TO FORM:



MATTHEW E. RICHARDSON
CITY ATTORNEY

STATE OF CALIFORNIA)
COUNTY OF ORANGE) SS.
CITY OF LAKE FOREST)

I, Lisa Berglund, City Clerk of the City of Lake Forest, California, do hereby certify that the foregoing Resolution No. 2022-01 was duly passed and adopted at a regular meeting of the Lake Forest City Council on the 4th day of January 2022, by the following vote, to wit:

AYES:	COUNCIL MEMBERS:	CIRBO, PEQUEÑO, MOATAZEDI, VOIGTS
NOES:	COUNCIL MEMBERS:	
ABSTAIN:	COUNCIL MEMBERS:	
ABSENT:	COUNCIL MEMBERS:	TETTEMER

Jennifer Weiss for
LISA BERGLUND, MPA
CITY CLERK

**Please Start Here, Instructions in Cell
A2, Table in A3:B15**

Form Fields

Site Inventory Forms must be submitted to HCD for a housing element or amendment adopted on or after January 1, 2021. The following form is to be used for satisfying this requirement. To submit the form, complete the Excel spreadsheet and submit to HCD at sitesinventory@hcd.ca.gov. Please send the Excel workbook, not a scanned or PDF copy of the tables.

General Information	
Jurisdiction Name	LAKE FOREST
Housing Element Cycle	6th
Contact Information	
First Name	Gayle
Last Name	Ackerman
Title	of Community Deve
Email	ackerman@lakeforestca.c
Phone	(949) 461-3463
Mailing Address	
Street Address	<u>Drive</u>
City	Lake Forest
Zip Code	92630

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
LAKE FOREST	23572 PROTHERO	92630	617-064-18		LOW-MEDIUM DENSITY RES	R2 - Multifamily Dwell	7	15	0.630937691	Vacant	YES - Current	NO - Privately-Owned	Available				8	8	36	Low Resource	
LAKE FOREST	23139 LOS ALISOS BLVD	92630	613-351-05		MEDIUM DENSITY RESIDE	R2 - Multifamily Dwell	15	25	33.91936634	Residential, 304	YES - Current	NO - Privately-Owned	Available			187	187	374	37	Moderate Resource	

Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Optional Information1	Optional Information2	Optional Information3
LAKE FOREST	23861 EL TORO RD	92630	617-053-09	12	6	8		0 Shortfall of Sites	1.263383665	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	27	Non-Vacant	Underutilized d	1	Low Resource	El Toro
LAKE FOREST	23862 BRIDGER RD	92630	617-053-10	12	6	8		0 Shortfall of Sites	1.300886792	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	27	Non-Vacant	Underutilized d	2	Low Resource	El Toro
LAKE FOREST	23861 EL TORO RD	92630	617-053-02	8	4	5		0 Shortfall of Sites	0.852017981	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	18	Non-Vacant	Underutilized d	3	Low Resource	El Toro
LAKE FOREST	23782 BRIDGER RD	92630	617-053-03	31	16	20		0 Shortfall of Sites	3.258929751	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	68	Non-Vacant	Underutilized d	4	Low Resource	El Toro
LAKE FOREST	23831 EL TORO RD	92630	617-053-11	81	42	53		0 Shortfall of Sites	8.389165381	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	176	Non-Vacant	Underutilized d	5	Low Resource	El Toro
LAKE FOREST	MERCURY RD & ROCKFIELD BLVD	92630	617-474-16	20	11	13		0 Shortfall of Sites	2.10018798	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	44	Non-Vacant	Underutilized d	6	Low Resource	Lake Forest Dr
LAKE FOREST	23764 MERCURY RD	92630	617-474-10	40	21	26		0 Shortfall of Sites	4.160877054	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	87	Non-Vacant	Underutilized d	7	Low Resource	Lake Forest Dr
LAKE FOREST	23591 ROCKFIELD BLVD	92630	617-431-06	8	4	5		0 Shortfall of Sites	0.786263309	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	17	Non-Vacant	Underutilized d	8	Low Resource	Lake Forest Dr
LAKE FOREST	23581 ROCKFIELD BLVD	92630	617-431-07	9	5	6		0 Shortfall of Sites	0.963305525	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	20	Non-Vacant	Underutilized d	9	Low Resource	Lake Forest Dr
LAKE FOREST	22821 ASPAN ST	92630	617-433-03	14	7	9		0 Shortfall of Sites	1.452132908	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	30	Non-Vacant	Underutilized d	10	Low Resource	Lake Forest Dr
LAKE FOREST	22762 ASPAN ST	92630	617-433-04	12	6	8		0 Shortfall of Sites	1.181806178	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	25	Non-Vacant	Underutilized d	11	Low Resource	Lake Forest Dr
LAKE FOREST	22771 CENTRE DR	92630	617-431-02	34	18	22		0 Shortfall of Sites	3.465348263	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	73	Non-Vacant	Underutilized d	12	Low Resource	Lake Forest Dr
LAKE FOREST	ASPAN ST & CENTRE DR	92630	617-433-08	22	12	14		0 Shortfall of Sites	2.283045845	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	48	Non-Vacant	Underutilized d	13	Low Resource	Lake Forest Dr
LAKE FOREST	22681 LAKE FOREST DR	92630	617-493-01	77	40	50		0 Shortfall of Sites	7.995414481	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	168	Non-Vacant	Underutilized d	14	Low Resource	Lake Forest Dr
LAKE FOREST	22471 ASPAN ST	92630	617-491-04	13	7	8		0 Shortfall of Sites	1.319692179	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	28	Non-Vacant	Underutilized d	15	Low Resource	Lake Forest Dr
LAKE FOREST	20780 LAKE FOREST DR C	92630	613-621-16	6	3	4		0 Shortfall of Sites	0.8517301	MIXED-USE 32	Community Commer	MIXED-USE 32	MU-32	0	32	14	Non-Vacant	Underutilized d	16	Moderate Resou	Civic Center
LAKE FOREST	20768 LAKE FOREST DR	92630	613-621-17	9	5	6		0 Shortfall of Sites	1.275748018	MIXED-USE 32	Community Commer	MIXED-USE 32	MU-32	0	32	20	Non-Vacant	Underutilized d	17	Moderate Resou	Civic Center
LAKE FOREST	20761 LAKE FOREST DR	92630	613-622-09	12	6	8		0 Shortfall of Sites	1.603887531	MIXED-USE 32	Community Commer	MIXED-USE 32	MU-32	0	32	26	Non-Vacant	Underutilized d	18	High Resource	Civic Center
LAKE FOREST	20722 LAKE FOREST DR	92630	613-621-12	6	3	4		0 Shortfall of Sites	0.742644428	MIXED-USE 32	Community Commer	MIXED-USE 32	MU-32	0	32	12	Non-Vacant	Underutilized d	19	Moderate Resou	Civic Center
LAKE FOREST	20702 LAKE FOREST DR	92630	613-621-10	16	8	10		0 Shortfall of Sites	2.153975934	MIXED-USE 32	Community Commer	MIXED-USE 32	MU-32	0	32	34	Non-Vacant	Underutilized d	20	Moderate Resou	Civic Center
LAKE FOREST	20652 LAKE FOREST DR	92630	613-621-11	8	4	5		0 Shortfall of Sites	1.116763	MIXED-USE 32	Community Commer	MIXED-USE 32	MU-32	0	32	18	Non-Vacant	Underutilized d	21	Moderate Resou	Civic Center
LAKE FOREST	20651 LAKE FOREST DR	92630	613-623-02	5	2	3		0 Shortfall of Sites	0.640688958	MIXED-USE 32	Community Commer	MIXED-USE 32	MU-32	0	32	10	Non-Vacant	Underutilized d	22	High Resource	Civic Center
LAKE FOREST	20671 LAKE FOREST DR	92630	613-623-01	12	6	8		0 Shortfall of Sites	1.656835568	MIXED-USE 32	Community Commer	MIXED-USE 32	MU-32	0	32	27	Non-Vacant	Underutilized d	23	High Resource	Civic Center
LAKE FOREST	26672 TOWNE CENTRE DR	92610	612-093-34	37	19	24		0 Shortfall of Sites	3.860087605	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	81	Non-Vacant	Underutilized d	24	High Resource	Foothill Ranch
LAKE FOREST	26642 TOWNE CENTRE DR	92610	612-093-33	36	19	24		0 Shortfall of Sites	3.77419289	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	79	Non-Vacant	Underutilized d	25	High Resource	Foothill Ranch
LAKE FOREST	26632 TOWNE CENTRE DR	92610	612-093-32	34	18	22		0 Shortfall of Sites	3.503322929	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	74	Non-Vacant	Underutilized d	26	High Resource	Foothill Ranch
LAKE FOREST	26622 TOWNE CENTRE DR	92610	612-093-26	11	6	7		0 Shortfall of Sites	1.135987335	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	24	Non-Vacant	Underutilized d	27	High Resource	Foothill Ranch
LAKE FOREST	26612 TOWNE CENTRE DR	92610	612-093-27	21	11	14		0 Shortfall of Sites	2.189852497	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	46	Non-Vacant	Underutilized d	28	High Resource	Foothill Ranch
LAKE FOREST	26592 TOWNE CENTRE DR	92610	612-093-25	12	6	8		0 Shortfall of Sites	1.254145848	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	26	Non-Vacant	Underutilized d	29	High Resource	Foothill Ranch
LAKE FOREST	26582 TOWNE CENTRE DR	92610	612-093-16	12	6	8		0 Shortfall of Sites	1.196160598	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	25	Non-Vacant	Underutilized d	30	High Resource	Foothill Ranch
LAKE FOREST	26572 TOWNE CENTRE DR	92610	612-093-30	6	3	4		0 Shortfall of Sites	0.57254868	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	12	Non-Vacant	Underutilized d	31	High Resource	Foothill Ranch
LAKE FOREST	26602 TOWNE CENTRE DR	92610	612-093-13	157	82	103		0 Shortfall of Sites	16.26471722	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	342	Non-Vacant	Underutilized d	32	High Resource	Foothill Ranch
LAKE FOREST	26526 TOWNE CENTRE DR	92610	612-093-31	10	5	6		0 Shortfall of Sites	1.019581701	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	21	Non-Vacant	Underutilized d	33	High Resource	Foothill Ranch
LAKE FOREST	24288 SWARTZ DR 1	92630	617-501-01	59	31	39		0 Shortfall of Sites	6.153220763	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	129	Non-Vacant	Underutilized d	34	Low Resource	El Toro
LAKE FOREST	24392 ROCKFIELD BLVD	92630	617-501-04	88	46	58		0 Shortfall of Sites	9.161718949	MIXED-USE 43	Community Commer	MIXED-USE 43	MU-43	0	43	192	Non-Vacant	Underutilized d	35	Low Resource	El Toro
LAKE FOREST	22722 CENTRE DR	92630	617-432-03	13	7	8		0 Shortfall of Sites	1.326328663	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	28	Non-Vacant	Underutilized d	38	Low Resource	Lake Forest Dr
LAKE FOREST	22765 ASPAN ST	92630	617-432-18	7	4	5		0 Shortfall of Sites	0.738090139	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	15	Non-Vacant	Underutilized d	39	Low Resource	Lake Forest Dr
LAKE FOREST	22741 ASPAN ST	92630	617-432-19	6	3	4		0 Shortfall of Sites	0.589382745	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	12	Non-Vacant	Underutilized d	40	Low Resource	Lake Forest Dr
LAKE FOREST	22859 LAKE FOREST DR	92630	617-432-14	7	4	5		0 Shortfall of Sites	0.742447552	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	16	Non-Vacant	Underutilized d	41	Low Resource	Lake Forest Dr
LAKE FOREST	22865 LAKE FOREST DR	92630	617-432-25	5	3	3		0 Shortfall of Sites	0.510942448	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	11	Non-Vacant	Underutilized d	42	Low Resource	Lake Forest Dr
LAKE FOREST	22855 LAKE FOREST DR	92630	617-432-13	11	6	7		0 Shortfall of Sites	1.07768409	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	23	Non-Vacant	Underutilized d	43	Low Resource	Lake Forest Dr
LAKE FOREST	22831 LAKE FOREST DR	92630	617-432-09	12	6	8		0 Shortfall of Sites	1.304262211	MIXED-USE 43	Industrial Park	MIXED-USE 43	MU-43	0	43	27	Non-Vacant	Underutilized d	44	Low Resource	Lake Forest Dr
LAKE FOREST	ORANGE AVE & WHISLER DR	92630	617-241-57	6	3	4		0 Shortfall of Sites	0.591088064	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	12	Non-Vacant	Underutilized d	45	Low Resource	Industrial/Rail
LAKE FOREST	25142 FRONT ST	92630	613-374-08	19	10	12		0 Shortfall of Sites	1.960023625	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	41	Non-Vacant	Underutilized d	46	Moderate Resou	Industrial/Rail
LAKE FOREST	23131 ORANGE AVE	92630	613-371-01	23	12	15		0 Shortfall of Sites	2.43740836	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	51	Non-Vacant	Underutilized d	47	Moderate Resou	Industrial/Rail
LAKE FOREST	23081 ORANGE AVE A	92630	613-361-03	9	5	6		0 Shortfall of Sites	0.917284252	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	19	Non-Vacant	Underutilized d	48	Moderate Resou	Industrial/Rail
LAKE FOREST	25101 FRONT ST	92630	613-372-05	5	3	3		0 Shortfall of Sites	0.506062432	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	11	Non-Vacant	Underutilized d	49	Moderate Resou	Industrial/Rail
LAKE FOREST	23132 ORANGE AVE	92630	613-372-02	19	10	13		0 Shortfall of Sites	1.981549095	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	42	Non-Vacant	Underutilized d	50	Moderate Resou	Industrial/Rail
LAKE FOREST	23132 ORANGE AVE	92630	613-372-01	8	4	5		0 Shortfall of Sites	0.844433033	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	18	Non-Vacant	Underutilized d	51	Moderate Resou	Industrial/Rail
LAKE FOREST	23222 OLIVE AVE	92630	613-373-06	11	6	7		0 Shortfall of Sites	1.166339659	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	24	Non-Vacant	Underutilized d	52	Moderate Resou	Industrial/Rail
LAKE FOREST	CHERRY AVE & FRONT ST	92630	613-373-03	6	3	4		0 Shortfall of Sites	0.651443735	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	14	Non-Vacant	Underutilized d	53	Moderate Resou	Industrial/Rail
LAKE FOREST	OLIVE AVE & FRONT ST	92630	613-373-02	8	4	5		0 Shortfall of Sites	0.82959032	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	17	Non-Vacant	Underutilized d	54	Moderate Resou	Industrial/Rail
LAKE FOREST	23271 CHERRY AVE	92630	613-373-01	12	6	8		0 Shortfall of Sites	1.218513428	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	26	Non-Vacant	Underutilized d	55	Moderate Resou	Industrial/Rail
LAKE FOREST	23211 CHERRY AVE	92630	613-362-04	16	8	10		0 Shortfall of Sites	1.641492507	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	34	Non-Vacant	Underutilized d	56	Moderate Resou	Industrial/Rail
LAKE FOREST	25312 JERONIMO RD	92630	613-362-02	14	7	9		0 Shortfall of Sites	1.437847034	URBAN INDUSTRIAL 43	Industrial Park	URBAN INDUS	UI-43	0	43	30	Non-Vacant	Underutilized d	57	Moderate Resou	Industrial/Rail
LAKE FOREST	INDIAN OCEAN DR & COMMERCENTRE DR	92630	610-332-07	0	0	21		21 Shortfall of Sites	3.464594704	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS	UI-25	0	25	42	Non-Vacant	Underutilized d	58	High Resource	Civic Center
LAKE FOREST	20712 CIVIC CENTER DR	92630	610-332-06	0	0	7		7 Shortfall of Sites	1.192169857	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS	UI-25	0	25	14	Non-Vacant	Underutilized d	59	High Resource	Civic Center
LAKE FOREST	INDIAN OCEAN DR & COMMERCENTRE DR	92630	610-332-04	0	0	14		14 Shortfall of Sites	2.329840458	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS	UI-25	0	25	28	Non-Vacant	Underutilized d	60	High Resource	Civic Center
LAKE FOREST	20602 CIVIC CENTER DR	92630	610-332-09	0	0	30		30 Shortfall of Sites	4.964294627	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS	UI-25	0	25	60	Non-Vacant	Underutilized d	61	High Resource	Civic Center
LAKE FOREST	26000 COMMERCENTRE DR	92630	610-332-08	0	0	19		19 Shortfall of Sites	3.088663236	URBAN INDUSTRIAL 25	Light Industrial	URBAN INDUS	UI-25	0	25	37	Non-Vacant	Underutilized d	62	High Resource	Civic Center
LAKE FOREST	INDIAN OCEAN DR & COMMERCENTRE DR	92630	104-132-79																		

Table C: Land Use, Table Starts in A2

Zoning Designation (From Table A, Column G)	General Land Uses Allowed
R2 Multifamily	Multifamily dwellings; single-family dwellings; modlehome developments; residential condominiums; residential planned (unit) developments.