City of San Clemente Community Development Department - Planning Division

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June 23, 2022 ***sent by e-mail***

California Department of Housing and Community Development
HousingElements@hcd.ca.gov

Mr. Paul McDougall, Housing Policy Manager
California Department of Housing and Community Development
Paul.mcdougall@hcd.ca.gov

Re: City of San Clemente 6th Cycle Housing Element Adopted – Revised

Dear HCD and Mr. McDougall:

Thank you for your assistance throughout the process, including the phone conversation on June 10, 2022. We are pleased to provide the City of San Clemente's *revised* 6th Cycle Housing Element. The Housing Element, adopted by the City Council on October 5, 2021, has been revised twice since January 2022. For each revision, the City sent notifications to interested parties, posted the revisions online for seven days, and met with housing advocates that submitted comments.

The enclosed *revised* Housing Element addresses comments from HCD and incorporates suggestions from housing advocates. Most notably are the City's commitments to program evaluation and expansion (emergency shelters and inclusionary zoning) and our focus on rezoning and zoning amendments in the first year of the 6th Cycle. We want to thank the housing advocates for participating in the process and hope they, like us, appreciate the enclosed revisions that make our Housing Element stronger.

The Housing Element is in full compliance with State Law and we look forward to HCD's certification.

Please let us know if you have any questions.

Sincerely,

Jennifer Savage

Jennifer Savage, AICP
Assistant to the City Manager

Enc: Memo

cc: Cecilia Gallardo-Daly, San Clemente Community Development Director
City of San Clemente Legal Counsel

City of San Clemente
2021-2029 Housing Element

Adopted

October 5, 2021

Revised

June 2022

Community Development Department

Planning Services

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San Clemente, CA 92672

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1 Introduction

1.1 Purpose of the Housing Element

The purpose of the Housing Element is to identify the City's housing needs and outline goals, policies and programs to address them. The Housing Element is an eight-year plan, extending from October 15, 2021 to October 15, 2029.

The primary issues addressed in the Housing Element include: 1) the provision of a decent home in a healthy environment for all economic levels of society; 2) housing affordability for special needs populations; 3) assisting in the development of affordable housing; 4) implementation of housing programs; and 5) rehabilitation and preservation of existing affordable housing.

1.2 Overview

State law requires the preparation of a Housing Element as part of a jurisdiction's General Plan (*Government Code* §65302(c)). It is the primary planning guide for local jurisdictions to identify and prioritize the housing needs of the city and determine ways to best meet these needs while balancing community objectives and resources. The 2021 Housing Element consists of five chapters, including: 1) Introduction; 2) Needs Assessment; 3) Resources and Opportunities; 4) Constraints; 5) Housing Action Plan; and the Appendices.

Guidelines adopted by the Department of Housing and Community Development (HCD) are also to be considered in the preparation of the Element (Section 65585). Periodic review of the Element is required to evaluate (1) the appropriateness of its goals, objectives and policies in contributing to the attainment of the state housing goals; (2) its effectiveness in attaining the City's housing goals and objectives; and (3) the progress of its implementation (Section 65588).

1.3 Consistency with General Plan

According to State planning law, the Housing Element must be consistent with the other General Plan elements. While each of the elements is independent, the elements are also interrelated to a degree. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration of issues throughout the General Plan creates a strong basis for the implementation of plans and programs and achievement of community goals. The Housing Element is most closely tied to the Land Use Element as residential development capacities established in the Land Use Element are incorporated into the Housing Element.

This Housing Element builds upon other General Plan elements and is entirely consistent with the policies and proposals set forth by the General Plan. This Housing Element reflects the land use policies established in the City's General Plan Update in 2014. When an element in the General Plan is amended in the future, the Housing Element will be reviewed and modified if necessary to ensure continued consistency among the various elements. This Housing Element was updated concurrently with the Safety Element update.

1.4 Public Participation

Public participation is an important component of the planning process in San Clemente, and this update to the Housing Element has provided residents and other interested parties numerous opportunities for review and comment.

Public participation for the 2021-2029 Housing Element included two online Housing Element and Safety Element Community Workshops on October 22, 2020 and January 26, 2021. Members of the community were invited to address concerns and give input on the contents of the Housing Element and Safety Element. The workshops included poll questions for participants to answer throughout the presentation. Special invitations were sent to housing developers, housing professionals, and agencies and organizations that provide supportive housing services to lower and moderate income households and persons with special needs (see Appendix A for mailing list). Notices were also posted on City website and social media platforms and the City published press releases. The October 2020 workshop was attended by 22 persons and the January 2021 workshop was attended by 17 persons. Presentations for both workshops were translated to Spanish and available on the City's website. During the October 2020 workshop, participants identified affordable housing and housing for the homeless as priority housing needs in the community, and seniors and young adults as the most underserved groups. During the January 2021 workshop, residents suggested North El Camino Real and Rancho San Clemente Specific Plan as appropriate areas for additional housing, but also suggested avoiding concentration of new housing in specific areas. The meeting recordings are available on the City's YouTube channel.

To further facilitate the community in assessing appropriate areas for increased housing, the City conducted an online survey from February 5 to March 26, 2021. The survey asked residents for their input and density preferences for the potential rezone sites as discussed in the January 2021 webinar. The City published the survey on their website and notified residents through email, two press releases, a special City Council presentation, and social media. As of March 2021, 617 responses were received. The City presented the potential sites for rezoning along before the Planning Commission on April 7, 2021 to solicit further input on the potential sites.

Public participation and input is incorporated into this Housing Element. As a result of Planning Commission and public input regarding potential sites for rezoning, the list was revised to remove protected open space and one site with an active project. In addition, the potential rezoning for sites immediately adjacent to the Pacifica San Clemente/Pacific Crest/Via Pacific neighborhoods was modified to account for concerns about high density housing near those neighborhoods.

Early on in the process, city staff met with the Kennedy Commission and advocacy partners to discuss the upcoming Housing Element Update effort. Their feedback is incorporated into this Housing Element through Community Workshop materials translated into Spanish, and providing public education through Community Workshops, a Housing Element landing page, and updates during the local Beachside Chat hosted by SC Times.

The City continues to engage the public throughout the development and adoption of the Housing Element. The Adopted Housing Element was revised to address additional comments from the State Department of Housing and Community Development (HCD) and other stakeholders who submitted comments to the City and HCD. The revised Housing Element was available for public review between April 8 and April 15, 2022 on the City website. Individuals and agencies/organizations that have previously commented on the Housing Element were notified. The City also sent out an email notification to its list of stakeholders and interested parties.

2 Needs Assessment

This section analyzes demographic and housing characteristics that influence the demand for and availability of housing. The analyses form a foundation for establishing programs and policies that seek to address identified housing needs.

2.1 Population Trends and Characteristics

Housing needs are influenced by population and employment trends. This section provides a summary of the changes to the population size, age, and racial/ethnic composition of the City of San Clemente.

2.1.1 Historical, Existing, and Forecast Growth

The City of San Clemente is one of 34 cities within Orange County. According to the U.S. Census, Orange County's population was 3,194,332 in 2020. Orange County is located between the counties of Los Angeles and San Diego. Population growth in Orange County during the previous decade (six percent) has slowed considerably since the 1990s (18 percent). From 2015 to 2020, the County population increased 1.48 percent. Table 2-1 presents counties in Southern California and their respective population trends.

Table 2-1: Regional Population Trends (2000-2020)

County	2000	2010	2020	% Change	
				2000-2010	2010-2020
Orange County	2,846,289	3,010,232	3,194,332	5.8%	6.1%
Los Angeles County	9,519,338	9,818,605	10,172,951	3.1%	3.6%
San Diego County	2,813,833	3,095,313	3,343,355	10.0%	8.0%

Source: State Department of Finance, E-5 City/County Population and Housing Estimates, 1/1/2020.

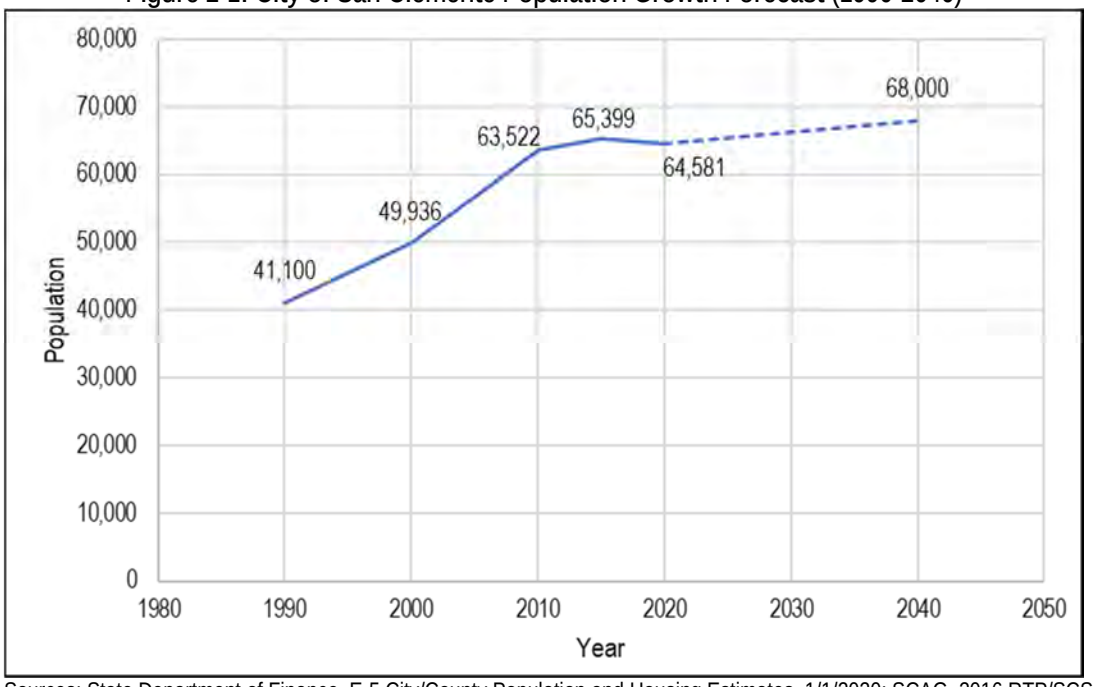
According to the U.S. Census and State Department of Finance (DOF), between 1980 and 2010 the City of San Clemente experienced population growth rates that were consistently higher than that countywide (Table 2-2). However, the City population decreased about one percent between 2015 and 2020. As indicated in Figure 2-1, the Southern California Association of Governments (SCAG) forecasts continued population growth in San Clemente over the next 20 years with an estimated population of 68,300 in 2040. Between 2020 and 2040, SCAG estimates the San Clemente population will increase by 5.3 percent, compared to 29.3 percent from 2000 to 2020.

Table 2-2: Population Growth (1990-2040)

Year	Orange County		San Clemente	
	Population	% Change	Population	% Change
1990	2,410,556	N/A	41,100	N/A
2000	2,846,289	18.1%	49,936	21.5%
2010	3,010,232	5.8%	63,522	27.2%
2015	3,147,655	4.8%	65,399	3.0%
2020	3,194,332	1.5%	64,581	-1.3%
2040	3,461,000	8.3%	68,000	5.3%

Source: State Department of Finance, E-5 City/County Population and Housing Estimates, 1/1/2020; SCAG, 2016 STRP/SCS: Demographics and Growth Forecast.

Figure 2-1: City of San Clemente Population Growth Forecast (1990-2040)



Sources: State Department of Finance, E-5 City/County Population and Housing Estimates, 1/1/2020; SCAG, 2016 RTP/SCS: Demographics and Growth Forecast.

2.1.2 Age Composition

As the "prime working" population, residents aged 25-44 years remain the largest age group in the San Clemente. As shown in Table 2-3, between 2010 and 2018, the percentage of residents between the ages of 45 and 54 decreased, while residents between the ages of 55 and 64 increased. The median age in the City was 44.2 years in 2018, a significant increase from the median age of 39.7 years recorded in 2010. In 2018, the proportion of seniors (65 years and over) in San Clemente was greater than in the County, and the median age of the City's population exceeded the County's by over six years.

Table 2-3: Age Distribution (2010-2018)

Age Group	Orange County		San Clemente	
	2010	2018	2010	2018
0 - 4 Years	6.00%	6.00%	6.50%	4.60%
5 - 17 Years	23.00%	16.50%	17.90%	16.80%
18 - 24 Years	9.50%	9.50%	7.90%	7.50%
25 - 44 Years	26.60%	27.40%	25.90%	22.00%
45 - 54 Years	13.90%	14.30%	16.10%	15.50%
55 - 64 Years	10.10%	12.30%	12.50%	16.10%
65+	10.90%	13.90%	13.20%	17.40%
Total	100%	100%	100%	100%
Median Age	36.2	37.8	39.7	44.2

Source: 2010 Census and ACS 2014-2018, Table S0101 (5-year estimates)

2.1.3 Race and Ethnicity

San Clemente residents are predominantly White. As of 2018, 73.4 percent of San Clemente's residents were Non-Hispanic White (Table 2-4). The City's demographics have remained fairly stable since 2010. By comparison, Orange County's population is significantly more diverse than San Clemente's. The proportion of Hispanic residents countywide is approximately double that of the City's and the percentage of Asian residents in Orange County is more than four times greater than in San Clemente.

Table 2-4: Racial and Ethnic Composition (2010-2018)

Ethnic Group	2010				2018			
	San Clemente		Orange County		San Clemente		Orange County	
Non-Hispanic White	48,254	76.0%	1,328,499	44.1%	47,732	73.4%	1,296,036	41.0%
Black/African American	349	0.5%	44,000	1.5%	419	0.6%	50,412	1.6%
Hispanic or Latino	10,702	16.8%	1,012,973	33.7%	11,135	17.1%	1,080,195	34.1%
Am. Ind./Alaska Native	193	0.3%	6,216	0.2%	140	0.2%	6,348	0.2%
Asian/Pacific Islander	2,347	3.7%	540,834	18.0%	3,144	4.8%	638,178	20.2%
Other	89	0.1%	5,593	0.2%	74	0.1%	5,881	0.2%
Two or more races	1,588	2.5%	72,117	2.4%	2,401	3.7%	87,132	2.8%
Total Population	63,522	100%	3,010,232	100%	65,045	100%	3,164,182	100%

Note: Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%.
Source: ACS 2014-2018, Table B03002 (5-year estimate).

2.2 Employment Trends

Housing needs are influenced by employment trends. Significant employment opportunities within the City can lead to growth in demand for housing in proximity to jobs. The quality and/or pay of available employment can determine the need for various housing types and prices.

As shown in Table 2-5, in 2018, the two industries with the largest number of employed San Clemente residents were "Educational, Health and Social Services" (18.4 percent) and "Professional, Scientific, Management, Administrative, and Waste Management Services" (16 percent). Following these, the three industries of Manufacturing, Retail Trade, and Arts/Entertainment/Recreation/Accommodation and Food Services exhibited represented between 10.4 percent and 11.5 percent of the employed residents.

Table 2-6 shows the San Clemente labor force, which only slightly increased from 31,500 in 2015 to 33,849 in 2018. According to the California Employment Development Department (EDD), the unemployment rate in San Clemente as of 2018 was 4.7 percent, a one percentage point increase since 2015.

Table 2-5: Employment by Industry (2014-2018)

Industry	San Clemente		Orange County	
	Employees	%	Employees	%
Agriculture, Forestry, Fishing and Hunting, and Mining	76	0.2%	8,771	0.6%
Construction	2,086	6.5%	90,153	5.7%
Manufacturing	3,447	10.7%	198,904	12.6%
Wholesale Trade	1,234	3.8%	56,164	3.6%
Retail Trade	3,347	10.4%	165,841	10.5%
Transportation and Warehousing, and Utilities	1,047	3.2%	55,229	3.5%
Information	651	2.0%	31,976	2.0%
Finance, Insurance, Real Estate, and Rental and Leasing	2,588	8.0%	135,201	8.6%
Professional, Scientific, Management, Administrative, and Waste Management Services	5,156	16.0%	227,315	14.4%
Educational, Health and Social Services	5,926	18.4%	304,398	19.3%
Arts, Entertainment, Recreation, Accommodation and Food Services	3,720	11.5%	173,459	11.0%
Other Services (except Public Administration)	2,056	6.4%	86,644	5.5%
Public Administration	930	2.9%	44,024	2.8%
Total	32,264	100.0%	1,578,079	100.0%

Note: Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%.
Source: ACS 2014-2018, Table DP03

Table 2-6: San Clemente Labor Force Trends (2010-2018)

Year	Labor Force	Employment	Unemployment	Unemployment Rate
2010	30,700	28,200	2,500	8.1%
2015	31,500	30,400	1,200	3.7%
2018	33,849	32,264	1,585	4.7%

Source: ACS 2014-2018, Table DP03

2.2.1 Impacts of COVID-19

With the outbreak of the COVID-19 pandemic, over 26 million unemployment insurance claims were filed between March 15 and April 18 at the start of stay-at-home orders as reported by the U.S. Department of Labor. In response Congress passed major relief bills including the $2 trillion CARES Act, which includes benefits and expanded eligibility for unemployment insurance, forgivable small-business loans, economic relief payments sent directly to most U.S. households, aid to state and local governments, and increased funding for housing assistance and other safety net programs.

The Census Bureau along with other governmental agencies partnered to design the Household Pulse Survey to publish data in as close to real time as possible during the COVID-19 pandemic. The survey provides vital insights on how American households are affected and coping during the pandemic. The Census Bureau expects to collect data for 90 days and release data weekly. Household Pulse Survey results were reported for State and Metropolitan Area geographies but data for the Orange County Metropolitan Area was not. Results for the Week 24 Survey (week of February 3 to February 15, 2021) showed that 53.6 percent (16 million) of adults in California reported that they or someone in their household had experienced a loss of employment income since March 13, 2020. Approximately 9.6 million adult

respondents (32.2 percent) also expected themselves or someone in their household to lose employment income in the next four weeks.

According to the Bureau of Labor Statistics, San Clemente's pre-COVID unemployment rate was 3.0 percent as of February 2020 but increased to 6.8 percent by the end of 2020.

2.3 Household Characteristics

This section describes San Clemente household characteristics. The Census Bureau defines a household as all persons living in a single housing unit, whether or not they are related. One person living alone is considered a household, as is a group of unrelated people living in a single housing unit. Residents in dormitory style housing are not considered a household.

2.3.1 Household Formation and Composition

In 2018, the Census reported 24,530 households in San Clemente, a 0.5-percent increase from 2015 (Table 2-7). In comparison, total households in Orange County were reported at 1,032,373 by 2018, indicating an increase by nearly two percent between 2015 and 2018.

Table 2-7: Total Households (2000-2018)

	2000	2010	2015	2018	% Change		
					2000-2010	2010-2015	2015-2018
San Clemente	19,395	23,906	24,409	24,530	23.3%	2.1%	0.5%
Orange County	935,287	992,781	1,012,422	1,032,373	6.1%	2.0%	2.0%
California	11,502,870	12,577,498	12,830,035	12,965,435	9.3%	2.0%	1.1%

Source: ACS 2014-2018, Table S1101

Approximately 66 percent of the City's households in 2018 were owner-occupied (Table 2-9), representing a slight increase since 64 percent in 2010. As shown in Table 2-8, households of two persons made up the largest segments of both owner- and renter-occupied households in San Clemente in 2010. In 2018, two-person owner-occupied households were still the most prevalent, while the number of one-person renter-occupied households surpassed the number of two-person renter-occupied households.

Table 2-8: Household Size Distribution (2010)

Household Size	Total Households[1]	% of Total	Renter-Households	% of Total[2]	Owner-Households	% of Total[2]
1 Person	5,184	21.7%	2,567	10.7%	2,617	10.9%
2 Persons	8,580	35.9%	2,639	11.0%	5,941	24.9%
3-4 Persons	7,674	32.1%	2,412	10.1%	5,262	22.0%
5+ Persons	2,468	10.3%	979	4.1%	1,489	6.2%
Total	23,906	100.0%	8,597	36.0%	15,309	64.0%

Notes:
1. Represents Total Households
2. Percent of Total Households
Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%.
Source: U.S. Census 2010 SF1 QT-H2

Table 2-9: Household Size Distribution (2018)

Household Size	Total Households[1]	% of Total	Renter-Households	% of Total[2]	Owner-Households	% of Total[2]
1 Person	5,719	23.3%	2,982	12.2%	2,737	11.2%
2 Persons	9,263	37.8%	2,323	9.5%	6,940	28.3%
3-4 Persons	7,128	29.1%	2,134	8.7%	4,994	20.4%
5+ Persons	2,420	9.9%	826	3.4%	1,594	6.5%
Total	24,530	100.0%	8,265	33.7%	16,265	66.3%

Notes:
1. Represents Total Households
2. Percent of Total Households
Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%.
Source: ACS 2014-2018, Table B25009

The majority of households in San Clemente were family households (72 percent), a slightly higher proportion than the County as a whole (Table 2-10). The Census defines family household as "two or more people (one of whom is the householder) related by birth, marriage, or adoption residing in the same housing unit." About 29 percent of all households in the City were families with children. More than 29 percent of households had at least one elderly member (65+ years), and 10.7 percent of all households were made up of an elderly person living alone. The average household size in San Clemente is 2.64 persons per household, lower than the Orange County average of 3.02 persons per household. Consistent with the increase in overall average household size since 2010, the average household size for owner-occupied units and renter-occupied increased slightly.

Table 2-10: Household Characteristics (2018)

Household Type	City of San Clemente	Orange County
Household Growth		
Households (2018)	24,530	1,032,373
Households (2010)	23,906	992,781
% Change 2010-2018	0.5%	2.0%
Household Type		
Families	71.9%	70.6%
Families with Children	29.3%	35.1%
Married Families With Children	39.6%	47.1%
Male Headed Families with Children	1.9%	2.2%
Female Headed Families with Children	3.0%	5.2%
Non-Family Households	29.4%	28.2%
Senior Living Alone	10.7%	9.0%
Households with elderly (60+ years) members	29.3%	35.1%
Household Size		
Average Household Size	2.64	3.02
Large Households (5+)	9.9%	14.2%
Large Households - Owners	6.5%	7.4%
Large Households - Renters	3.4%	6.8%

Note: Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%.
Source: ACS 2014-2018, Table S1101 and B09002

2.3.2 Tenure

Tenure preferences are primarily related to household income, composition, and age of the householder. Communities need to have an adequate supply of units available both for rent and for sale in order to accommodate a range of households with varying incomes, family sizes, composition, life-styles, etc. Approximately 66 percent of San Clemente's households were owner-households and 34 percent of the households were renter-households in 2018. As shown in Table 2-11, the percentage of owner-occupied households in San Clemente was higher than in Orange County and California.

Table 2-11: Occupied Units by Tenure (2018)

	Owner-Occupied		Renter- Occupied		Total	
	Number	%	Number	%	Number	%
San Clemente	16,265	66.3%	8,265	33.7%	24,530	100%
Orange County	592,269	57.4%	440,104	42.6%	1,032,373	100%
California	7,165,664	54.8%	5,906,458	45.2%	13,072,122	100%

Note: Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%.
Source: ACS 2014-2018, Table B2009.

2.3.3 Household Income

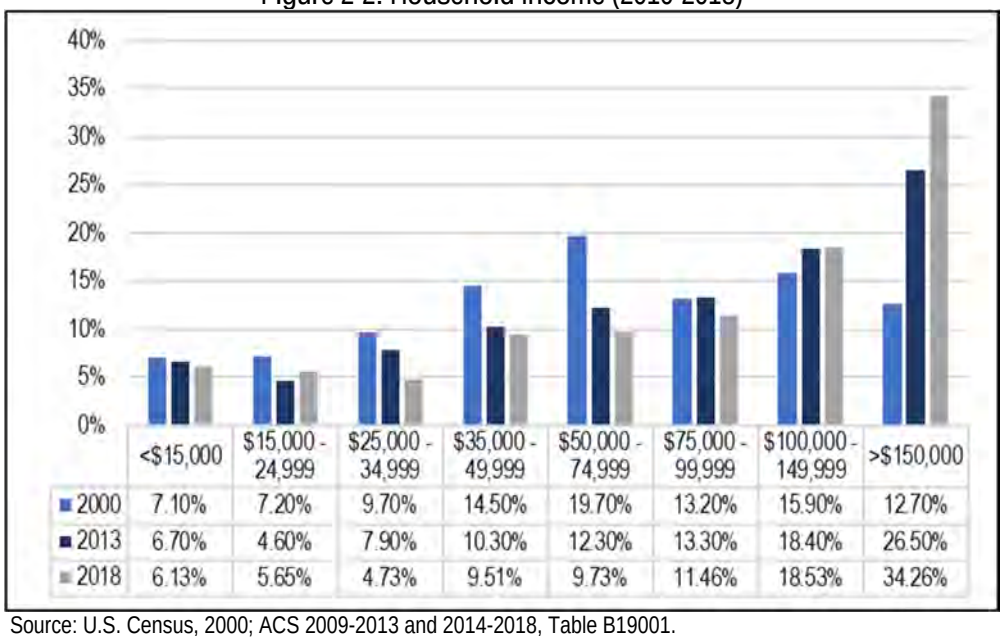
As shown in Table 2-12, about 15 percent of the households earn less than $35,000 and 52 percent of the households earned more than $100,000 (Figure 2-2). As indicated in Table 2-13, according to the 2014-2018 American Community Survey (ACS), the median household income for San Clemente was $105,812. The City has a higher median income than both the County and the State (Table 2-13). Between 2013 and 2018, the median income in San Clemente increased by approximately nine percent compared to five percent Countywide.

Table 2-12: Household Income by Tenure (2018)

	Owner-Households		Renter-Households		Total Households	
	Number	%	Number	%	Number	%
Less than $5,000	298	1.8%	311	3.7%	609	2.5%
$5,000 to $9,999	103	0.6%	185	2.2%	288	1.2%
$10,000 to $14,999	221	1.4%	363	4.4%	584	2.4%
$15,000 to $19,999	131	0.8%	206	2.5%	337	1.4%
$20,000 to $24,999	330	2.0%	448	5.4%	778	3.2%
$25,000 to $34,999	468	2.9%	616	7.5%	1,084	4.4%
$35,000 to $49,999	1,223	7.5%	993	12.0%	2,216	9.0%
$50,000 to $74,999	1,870	11.5%	1,385	16.8%	3,255	13.3%
$75,000 to $99,999	1,275	7.8%	1,322	16.0%	2,597	10.6%
$100,000 to $149,000	2,885	17.7%	1,255	15.2%	4,140	16.9%
$150,000 or more	7,461	45.9%	1181	14.3%	8,642	35.2%
Total	16,265	100%	8,265	100%	24,530	100%

Note: Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%
Source: ACS 2014-2018, Table B25118.

Figure 2-2: Household Income (2010-2018)



Source: U.S. Census, 2000; ACS 2009-2013 and 2014-2018, Table B19001.

Table 2-13: Median Household Income (2013-2018)

Jurisdiction	2013 Median Household Income		2018 Median Household Income (C)	% Change (B to C)
	Unadjusted 2013 (A)	Inflation Adjusted to 2018 (B)		
San Clemente	$90,071	$96,950	$105,812	9.1%
Orange County	$75,422	$81,182	$85,398	5.2%
State of California	$61,094	$65,760	$71,228	8.3%

Source: ACS, 2014-2018, Table S1901; U.S. Department of Labor, Bureau of Labor Statistics.

For the purposes of the Housing Element, the State Department of Housing and Community Development (HCD) has established five income groups based on Area Median Income (AMI) for the County:[1]

- Extremely Low Income: up to 30 percent of AMI
- Very Low Income: 31-50 percent of AMI
- Low Income: 51-80 percent of AMI
- Moderate Income: 81- 120 percent AMI
- Above Moderate Income: >120 percent AMI

Pursuant to state and federal regulations, the Area Median Income refers to the median income for the Metropolitan Statistical Area. For the City of San Clemente, this area refers to Orange County. County Median Income as published by HCD must be used to establish income groups for the purpose of the Housing Element.

The U.S. Department of Housing and Urban Development (HUD) periodically receives "custom tabulations" of Census data from the Census Bureau that are largely not available through standard Census products. This dataset, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrates the extent of housing problems and housing needs, particularly for lower-income households. According to the CHAS data shown in Table 2-14, extremely low and very low income households each comprised about 10 percent of all households in San Clemente. Another 13 percent were within the low income (80 percent AMI) category. The majority of the City's households (nearly 66 percent) were within the moderate/above moderate income category (greater than 80 percent AMI). The proportion of moderate/above moderate income households in the City was higher than that for the County as a whole (66 percent in the City versus 55 percent in the County).

[1] State income definitions are different than federal income definitions. For federal housing programs, eligibility is established for households with incomes up to only 80 percent of the AMI. These households, under the federal definition, are considered moderate income. For housing plans that are required by federal regulations, such as the Consolidated Plan and Analysis of Impediments to Fair Housing Choice, the federal income definitions are used.

Table 2-14: Distribution by Income Group (2017)

Jurisdiction	Total Households	Extremely Low Income (0-30%)	Very Low Income (31-50%)	Low Income (51-80%)	Moderate/Above Moderate Income (80%+)
San Clemente	24,565	10.3%	10.4%	13.7%	65.6%
Orange County	1,024,975	14.9%	12.5%	17.4%	55.2%

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

2.4 Housing Inventory and Market Conditions

2.4.1 Housing Growth

Between 2010 and 2018, housing growth in San Clemente outpaced the County and surrounding jurisdictions. By 2018, the City had approximately 27,868[2] units, a seven-percent increase from 2010 compared to a two-percent increase countywide (Table 2-15).

Table 2-15: Housing Unit Growth (2010-2018)

City/County	# of Units 2010	# Units 2015	% Change 2010-2015	# Units 2018	% Change 2010-2018
Dana Point	15,938	15,972	0.2%	17,317	8.4%
Laguna Niguel	25,312	25,456	0.6%	27,140	6.6%
Mission Viejo	34,228	34,619	1.1%	34,664	0.1%
San Clemente	25,966	26,116	0.6%	27,868	6.7%
San Juan Capistrano	11,940	12,215	2.3%	13,116	7.4%
Orange County	1,048,907	1,069,450	2.0%	1,091,376	2.1%

Note: Department of Finance estimates are corrected for demolition; therefore, housing growth in this table presents net increases in the housing stock.
Sources: Census Bureau 2010 Census; State Department of Finance, Housing Estimates, May 2015; ACS 2014-2018 Table DP04.

2.4.2 Unit Type and Size

2.4.2.1 Composition of Housing Stock

Between 2000 and 2018, the proportion of single-family detached units in the City increased five percentage points and that of multi-family units decreased four percentage points (Table 2-16). Mobile home and other units seemed to fluctuate in size, but probably only a result of small sample sizes. Compared to San Clemente, the composition of housing countywide was stable from 2000 to 2018.

As of 2018, single-family detached units make up 57.7 percent of the City's housing inventory. Multi-family units make up 29.6 percent of the housing inventory. The City has a higher percentage of single-family homes and a lower percentage of multi-family homes compared to the entire County.

[2] "Units" refers to the total number of physical housing units in the City. Vacant, for-sale, for-rent, and units used for a purpose other than housing are counted towards total housing units. Households are occupied housing units.

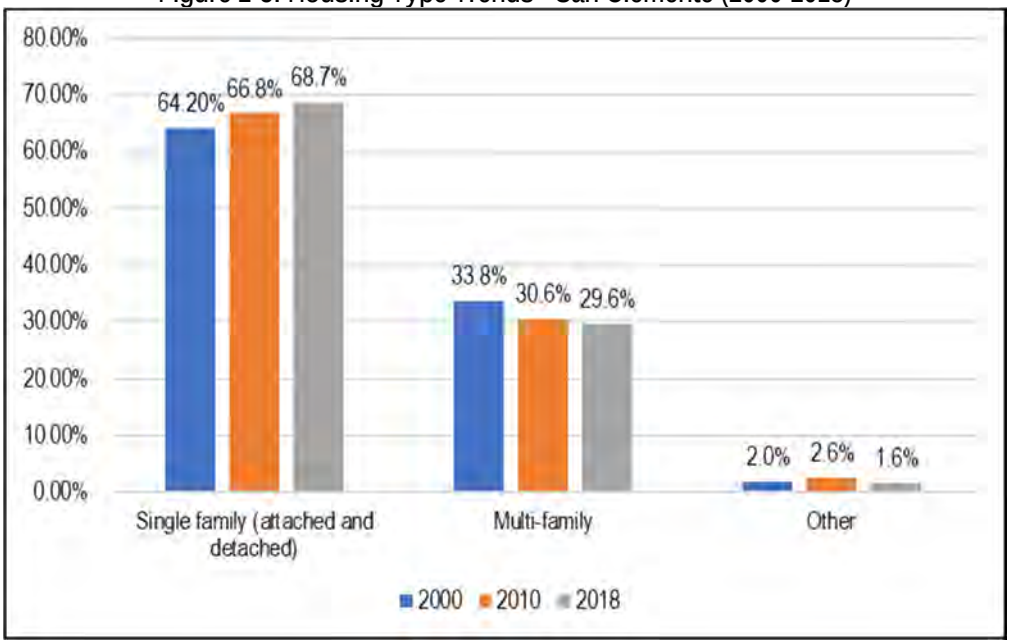
As shown in Table 2-18, 31 percent of housing units in the City are three-bedroom units. Three-bedroom units are the most common, closely followed by two-bedroom units (27 percent) and four-bedroom units (21 percent).

Table 2-16: Housing Inventory by Type (2000-2018)

Housing Type	2000	% of Total	2010*	% of Total	2018	% of Total
San Clemente						
Single family, detached	10,886	52.7%	14,708	56.6%	16,087	57.7%
Single family, attached	2,384	11.5%	2,637	10.2%	3,078	11.0%
Multi-family	6,980	33.8%	7,948	30.6%	8,264	29.6%
Mobile homes and Other (Boats, RV, etc.)	403	2.0%	673	2.6%	439	1.6%
Total Housing Units	20,653	100%	25,966	100%	27,868	100%
Orange County						
Single family, detached	489,657	50.5%	532,087	50.7%	553,164	50.7%
Single family, attached	124,702	12.9%	127,769	12.2%	133,326	12.2%
Multi-family	322,675	33.3%	353,751	33.7%	374,176	34.2%
Mobile homes and Other (Boats, RV, etc.)	32,450	3.3%	35,300	3.4%	30,710	2.8%
Total Housing Units	969,484	100%	1,048,907	100%	1,091,376	100%

*No Census data collected on housing type in 2010. Data displayed for 2010 are estimates based on the 2006-2010 ACS and are not exact.
Note: Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%
Source: U.S. Census, (2000-2010); ACS, (2006-2010); and State Department of Finance, Housing Estimates, (2015), ACS 2014-2018 Table DP04.

Figure 2-3: Housing Type Trends - San Clemente (2000-2018)



Source: U.S. Census, (2000-2010); ACS, (2006-2010); and State Department of Finance, Housing Estimates, (2015), ACS 2014-2018 Table DP04.

Table 2-17: Unit Type by Tenure (2014-2018)

	Owner-Occupied		Renter-Occupied		Total Occupied	
	Units	%	Units	%	Units	%
Single family, detached	13,445	82.7%	1,398	16.9%	14,843	60.5%
Single family, attached	1,692	10.4%	1,102	13.3%	2,794	11.4%
Multi-family (2-4 units)	474	2.9%	2,968	35.9%	3,442	14.0%
Multi-family (5+ units)	437	2.7%	2,765	33.5%	3,202	13.1%
Mobile Homes	217	1.3%	32	0.4%	249	1.0%
Other (Boats, RV, etc.)	0	0.0%	0	0.0%	0	0.0%
Total	16,265	100.0%	8,265	100.0%	24,530	100.0%

Note: Percentages have been rounded to the nearest tenth; therefore, the sum of the values may deviate slightly from 100%
Source: ACS 2014-2018, Table B25032.

Table 2-18: Unit Size by Tenure (2018)

	Total Occupied Housing Units	
	Units	%
Studio	800	2.9%
1 bedroom	2,435	8.7%
2 bedrooms	7,469	26.8%
3 bedrooms	8,697	31.2%
4 bedrooms	5,948	21.3%
5 or more bedrooms	2,519	9.0%
Total	27,868	100%

Source: ACS 2014-2018, Table DP04.

2.4.2.2 Vacancy Rates

A certain number of vacant units are needed to moderate the cost of housing, allow sufficient choice for residents and provide an incentive for unit upkeep and repair. Vacancy rates are generally higher among rental properties, as rental units have greater attrition than owner-occupied units. A healthy vacancy rate — one which permits sufficient choice and mobility among a variety of housing units — is considered to be two-to-three percent for ownership units and five-to-six percent for rental units.

In 2010, the overall vacancy rate in San Clemente was 7.9 percent (Table 2-19). The overall vacancy rate increased to 12 percent in 2018, with the for-rent vacancy at 4 percent and the for-sale vacancy at 0.6 percent. These lower than optimum rates suggest a shortage in housing. Other units were vacant due to seasonal occupancy or other reasons. Specifically, more than 300 housing units in the City are used as vacation rentals. The presence of vacation rentals has the potential to exacerbate the tight rental housing market in the community, reducing affordable housing opportunities for the workforce. To address this issue, the City has a capacity limit on vacation rentals relative to the number of housing units. In reviewing the applications for Short-Term Lodging Units (STLU), the City considers issues such as replacement of affordable units with other uses and coastal approvals.

Table 2-19: Vacancy (2010-2018)

Occupancy Status	2010		2018	
	Total	%	Total	%
Occupied Housing Units	23,906	92.1%	24,530	88.0%
Vacant Housing Units	2,060	7.9%	3,338	12.0%
For-Sale	--	1.3%	--	0.6%
For-Rent	--	5.8%	--	4.0%
Total Housing Units	25,966	100%	27,868	100%

Source: ACS 2014-2018, Table DP04.

2.4.3 Housing Conditions

2.4.3.1 Age of Housing Stock

The age of a housing unit is often an indicator of housing conditions. In general, housing that is 30 years or older may exhibit a need for repairs based on the useful life of materials. Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs.

The ACS provides data on the age of housing stock by tenure. Approximately 66 percent of occupied units in the City were built before 1990 (30+ years old) and approximately 26 percent were built before 1970 (50+ years old). Table 2-20 provides a summary of the age of the City's housing stock by tenure. Based on the age alone, a significant portion of the housing stock may require rehabilitation works in the upcoming decade. A larger percentage of renter-occupied units were built before 1990 (78 percent) compared to owner-occupied units (60 percent).

Table 2-20: Tenure by Age of Housing Stock (Occupied Units - 2018)

Year Built	Owner-Occupied		Renter- Occupied		Total Occupied Housing Units	
	Units	%	Units	%	Units	%
2010 or later	196	1.2%	257	3.1%	453	1.9%
2000 – 2009	4,243	26.1%	748	9.1%	4,991	20.4%
1990 - 1999	2,121	13.0%	798	9.7%	2,919	11.9%
1980 - 1989	3,462	21.3%	1,310	15.9%	4,772	19.5%
1970 - 1979	2,656	16.3%	2,349	28.4%	5,005	20.4%
1960 - 1969	2,037	12.5%	1,577	19.1%	3,614	14.7%
1950 - 1959	993	6.1%	822	10.0%	1,815	7.4%
1940 - 1949	394	2.4%	256	3.1%	650	2.7%
1939 or earlier	163	1.0%	148	1.8%	311	1.3%
Total	16,265	100%	8,265	100%	24,530	100%

Note: The data is from the ACS and therefore, is based on a sample of units and extrapolated to represent the entire housing stock. This table is intended only to provide a general picture of age and tenure of the housing stock.
Source: ACS 2014-2018, Table B25036.

2.4.3.2 Housing Conditions

Housing is considered substandard when conditions are found to be below the minimum standard of living conditions defined in Section 1001 of the Uniform Housing Code. Households living in substandard conditions are considered to be in need of housing assistance, even if they are not seeking alternative housing arrangements, due to the threat to health and safety.

In addition to structural deficiencies and standards, the lack of infrastructure and utilities often serves as an indicator for substandard conditions. According to the 2014-2018 ACS, 0.3 percent of occupied units in San Clemente lacked complete plumbing facilities (Table 2-21). Additionally, 2.1 percent of occupied units lacked complete kitchen facilities. None of the renter-occupied units in the City had a lack of plumbing facilities, but significantly more renter-occupied units lacked kitchen facilities compared to owner-occupied units. It should be noted that there may be some overlap in the number of substandard housing units, as some units may lack both complete plumbing and kitchen facilities. However, the Census typically undercounts substandard housing conditions as it is not able to report on other more subtle housing problems, such as inadequate wiring, leaks, or inadequate or lack of heating.

Table 2-21: Units Lacking Plumbing or Complete Kitchen Facilities (2018)

Units	Owner Occupied	% Owner Occupied	Renter Occupied	% Renter Occupied	Total	% of Total
Lacking plumbing facilities	79	0.5%	0	0.0%	79	0.3%
Lacking complete kitchen facilities	79	0.5%	408	5.4%	487	2.1%
Total	15,618	100.0%	7,595	100.0%	23213	100.0%

Source: ACS 2014-2018, Tables B25049, B25053.

2.4.3.3 Code Enforcement Activities

San Clemente's Code Compliance Services throughout the City are provided solely on a complaint basis. A complaint-based system may result in underreporting of code compliance issues, particularly on the rental housing stock. Often tenants fear retaliation from the landlords and are therefore less willing to report an issue. Language barriers may be another obstacle for reporting code compliance issues.

Between 2017 and 2021, Code Compliance had investigated 169 code compliance issues. The majority of the issues were related to nuisance abatement. About 20 percent were unpermitted construction. Less than five percent were about substandard or unsafe housing conditions. Therefore, the City estimates that less than one percent of the City housing stock may be considered substandard and requiring replacement.

2.4.4 Housing Costs and Affordability

2.4.4.1 Housing Prices and Rents

Table 2-22 displays median home prices for San Clemente and neighboring jurisdictions within Orange County. In June 2020, the median sales price for homes in San Clemente was $1,022,000, an increase of 16 percent from the same month in 2019. The median price of San Clemente homes was near the highest among neighboring communities, exceeded only by Dana Point.

Table 2-22: Median Home Prices (2019-2020)

Jurisdiction	# Sold	Median Price June 2019	Median Price June 2020	% Change 2019-2020
San Clemente	94	$880,000	$1,022,000	16.1%
Aliso Viejo	48	$531,000	$540,750	1.8%
Garden Grove	66	$587,500	$645,000	9.8%
San Juan Capistrano	39	$855,000	$1,020,000	19.3%
Dana Point	43	$960,000	$1,050,000	9.4%
Laguna Niguel	81	$814,250	$799,500	-1.8%
Orange County	2,487	$735,000	$765,000	4.1%

Source: Corelogic.com, California Home Sale Activity by City, 2020. Accessed August 13, 2020.

Information on rental rates in the City was obtained through a review of advertisements on Craigslist in August 2020 and Zillow in April 2021. Available rental housing ranged from studio units to five-bedroom units. The majority of available units in the City were one-and-two bedroom apartment units. Table 2-23 summarizes average apartment rents by unit size. Overall, 85 units of varying sizes were listed as available for rent on craigslist in August 2020 with an average rent of $3,171 and 20 units were listed as available for rent on Zillow in April 2021 with an average rent of $2,733.

Table 2-23: Average Rent by Unit Size (2020, 2021)

	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4+ Bedroom
Craigslist.org	--	$1,892	$2,484	$3,709	$4,599
Zillow.com	$1,995	$2,135	$2,832	$4,321	--
All Listings	$1,995	$1,935	$2,549	$3,831	$4,599

Sources: www.craigslist.org, accessed August 2020; www.Zillow.com, accessed April 2021.

2.4.4.2 Affordability Gap Analysis

The costs of homeownership and renting can be compared to a household's ability to pay for housing to determine affordability. Housing affordability is defined as paying no more than 30 to 35 percent of the gross household income (depending on tenure and income level) on housing expenses. Table 2-24 summarizes affordable rents and purchase prices by income category based on the 2020 HCD median income of $103,000 for Orange County.[3] General cost assumptions for utilities, taxes, and property insurance are also shown. Affordable purchase price assumes a three-percent interest rate with a 30-year fixed rate mortgage loan and a 10-percent down payment. Given the high costs of homeownership, lower

[3] State and federal income limits differ. For the Housing Element, State income limits are used, which are usually higher than the federal levels used in the City's Consolidated Plan and other related documents.

income households are usually confined to rental housing but the affordability problem also persists in the rental market. The situation is exacerbated for large households with lower and moderate incomes given the limited supply of large rental units, and for seniors with their fixed incomes.

Table 2-24: Housing Affordability Matrix - Orange County (2020)

Income	Annual Income	Affordable Monthly Housing Costs	Utilities	Taxes, Insurance and HOA (Ownership)	Maximum Affordable Price	
					Rent	Sale
Extremely Low Income (0-30% AMI)						
1-Person	$26,950	$674	$122	$236	$552	$83,263
2-Person	$30,800	$770	$164	$270	$606	$88,682
3-Person	$34,650	$866	$212	$303	$654	$92,520
4-Person	$38,450	$961	$272	$336	$689	$92,982
5-Person	$41,550	$1,039	$330	$364	$709	$90,972
Very Low Income (30-50% AMI)						
1-Person	$44,850	$1,121	$122	$392	$999	$159,922
2-Person	$51,250	$1,281	$164	$448	$1,117	$176,261
3-Person	$57,650	$1,441	$212	$504	$1,229	$191,020
4-Person	$64,050	$1,601	$272	$560	$1,329	$202,616
5-Person	$69,200	$1,730	$330	$606	$1,400	$209,386
Low Income (50-80%AMI)						
1-Person	$71,750	$1,794	$122	$628	$1,672	$275,123
2-Person	$82,000	$2,050	$164	$718	$1,886	$307,951
3-Person	$92,250	$2,306	$212	$807	$2,094	$339,197
4-Person	$102,450	$2,561	$272	$896	$2,289	$367,067
5-Person	$110,650	$2,766	$330	$968	$2,436	$386,899
Median Income (80-100% AMI)						
1-Person	$72,100	$1,803	$122	$631	$1,681	$276,622
2-Person	$82,400	$2,060	$164	$721	$1,896	$309,664
3-Person	$92,700	$2,318	$212	$811	$2,106	$341,124
4-Person	$103,000	$2,575	$272	$901	$2,303	$369,422
5-Person	$111,250	$2,781	$330	$973	$2,451	$389,468
Moderate Income (100-120% AMI)						
1-Person	$86,500	$2,163	$122	$757	$2,041	$338,291
2-Person	$98,900	$2,473	$164	$865	$2,309	$380,327
3-Person	$111,250	$2,781	$212	$973	$2,569	$420,566
4-Person	$123,600	$3,090	$272	$1,082	$2,818	$457,644
5-Person	$133,500	$3,338	$330	$1,168	$3,008	$484,756

Assumptions: 2020 HCD income limits; Health and Safety code definitions of affordable housing costs (30% of household income); 35% of monthly affordable cost for taxes and insurance; 10% down payment; and 3% interest rate for a 30-year fixed-rate mortgage loan. Taxes and insurance apply to owner costs only; renters do not usually pay taxes or insurance.
Sources: State Department of Housing and Community Development 2020 Income Limits; Orange County Housing Authority Utility Allowances, 2020; Veronica Tam and Associates, 2020.

2.5 Housing Needs

This section provides an overview of existing housing needs in San Clemente. It focuses on four categories:

- Housing need resulting from housing cost burden;
- Housing need resulting from overcrowding;
- Housing need resulting from population growth and demolition of the existing housing stock; and,
- Housing needs of special needs groups such as elderly persons, large households, persons with disabilities, female-headed households, homeless persons, and farmworkers.

2.5.1 Housing Cost Burden

Housing cost burden is generally defined as households paying more than 30 percent of their gross income on housing related expenses, including rent or mortgage payments and utilities. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. High housing costs can cause households to spend a disproportionate percentage of their income on housing. This may result in payment problems, deferred maintenance or overcrowding. This section uses data from the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) published by HUD. The CHAS provides information related to households with housing problems, including cost burden, overcrowding and/or without complete kitchen facilities and plumbing systems. The most recent estimates were posted by HUD in August 2020 and were derived from the 2013-2017 ACS.

As shown in Table 2-25, a significant portion of households were experiencing cost burden greater than 30 percent. Among renters, 54 percent of households paid more than 30 percent of income towards housing costs. About 29 percent of renters paid more than 50 percent of their income towards housing costs. Cost burden rates were also high among San Clemente homeowners. Almost 34 percent of owner-households paid more than 30 percent of income towards housing costs, and 15 percent paid more than 50 percent of household income towards housing costs. Table 2-26 provides further details of housing cost burden by income and household type.

Table 2-25: Housing Cost Burden by Tenure (2017)

Household	Cost Burden (30%+)	Severe Cost Burden (50%+)
Lower Income Households (80% AMI)		
Owner-Occupied	16.1%	12.2%
Renter-Occupied	43.6%	28.4%
All Households	25.5%	17.8%
All City Households		
Owner-Occupied	33.6%	15.3%
Renter-Occupied	53.9%	29.2%
All Households	40.5%	20.1%

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

Table 2-26: Cost Burden by Income Level and Household Type

Household by Type, Income & Housing Problem	Renters				Owners				Total HHs
	Elderly	Small Families	Large Families	Total Renters	Elderly	Small Families	Large Families	Total Owners	
Ext. Low Income (0-30% AMI)	315	635	100	1,560	685	85	55	980	2,540
with cost burden 30%-50%	68.3%	89.0%	100.0%	83.7%	73.0%	82.4%	100.0%	75.5%	80.5%
with cost burden > 50%	65.1%	87.4%	100.0%	82.4%	65.0%	82.4%	100.0%	66.8%	76.4%
Very Low Income (31-50% AMI)	335	635	320	1,440	790	320	35	1,110	2,550
with cost burden 30%-50%	92.5%	96.9%	82.8%	93.4%	54.4%	87.5%	100.0%	64.9%	81.0%
with cost burden > 50%	65.7%	62.2%	31.3%	60.8%	41.1%	64.1%	100.0%	53.6%	57.7%
Low Income (51-80% AMI)	255	625	120	1,520	835	480	50	1,845	3,365
with cost burden 30%-50%	82.4%	63.2%	41.7%	67.4%	32.3%	90.6%	70.0%	61.5%	64.2%
with cost burden > 50%	25.5%	15.2%	20.8%	15.5%	16.2%	55.2%	20.0%	39.0%	28.4%
Moderate/Above Moderate Income (81%+ AMI)	550	1,535	230	3,905	3,269	4,915	1,390	12,205	16,110
with cost burden > 30%	29.1%	23.1%	30.4%	22.2%	24.5%	9.1%	24.5%	23.2%	22.9%
with cost burden > 50%	3.6%	1.0%	0.0%	1.8%	5.2%	3.6%	5.8%	4.1%	3.6%
Total Households	1,455	3,430	770	8,430	5,579	5,800	1,530	16,135	24,565
with cost burden > 30%	61.5%	56.3%	63.0%	53.9%	35.9%	21.2%	30.4%	33.6%	40.6%
with cost burden > 50%	35.1%	30.9%	29.2%	29.2%	19.3%	12.3%	11.8%	15.3%	20.1%

Note: HUD CHAS (Comprehensive Housing Affordability Strategy) data is based on tabulations from the ACS and has a smaller sample size than the Decennial Census. Due to the smaller sample size, the data presented may have significant margins of error, particularly for smaller geographies. The intent of the data is to show general proportions of household need, not exact numbers.
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data (2013-2017 ACS), 2020.

2.5.2 Overcrowding

Some households may not be able to accommodate high cost burdens for housing, but may instead accept smaller housing or reside with other individuals or families in the same home. Household overcrowding is reflective of various living situations: (1) a family lives in a home that is too small; (2) a family chooses to house extended family members; or (3) unrelated individuals or families are doubling up to afford housing. However, cultural differences also contribute to the overcrowded conditions. Some cultures tend to have larger household size than others due to the preference of sharing living quarters with extended family members as a way of preventing homelessness among family members. Overcrowding can strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes.

In general, overcrowding was not an issue in the City compared to the County overall. Less than two percent of all households in San Clemente were overcrowded and another 1.5 percent were severely overcrowded. Overcrowding was significantly more prevalent among renter-households than owner-households (Table 2-27). Countywide, a larger proportion of the households were considered overcrowded.

Table 2-27: Overcrowding by Tenure (2018)

Jurisdiction	Overcrowded (1.01-1.5 occupants per room)			Severely Overcrowded (1.5+ occupants per room)		
	Renter	Owner	Total	Renter	Owner	Total
San Clemente	3.8%	0.7%	1.7%	4.1%	0.2%	1.5%
Orange County	10.9%	2.7%	5.8%	5.9%	1.0%	3.1%

Source: ACS 2014-2018, Table B25014

2.5.3 Housing Growth Need (2021-2029, 6th Cycle)

The State of California determines the future housing needs for the counties that make up the SCAG region. SCAG is responsible for allocating the housing needs to each jurisdiction in its region. A local jurisdiction's share of regional housing needs is the number of additional housing units needed to accommodate the forecasted household growth, to replace expected demolitions and conversion of housing units to non-housing uses, and to achieve an optimum vacancy rate that allows for healthy functioning of the housing market. The allocation is divided into four income categories: Very Low, Low, Moderate, and Above Moderate. Table 2-28, shows the Regional Housing Needs Allocation for the City of San Clemente as determined by SCAG.

Table 2-28: Regional Housing Needs Allocation (2021-2029)

	Total	Very Low Income	Low Income	Moderate Income	Above-Moderate Income
Number of Housing Units	982	282	164	188	348

Source: SCAG 6th Cycle Draft RHNA Allocation, September 2020.

2.5.4 Special Needs Groups

Certain households, because of their special characteristics and needs, may require special accommodations and may have difficulty finding housing due to special needs. Special needs groups include extremely low income households, seniors, persons with disabilities, families with children, single-parent households, large households, homeless persons and persons at-risk of homelessness, farmworkers, and persons with HIV/AIDS.

2.5.4.1 Extremely Low Income Households

Extremely low income households, those making less than 30 percent of the County AMI, have particular difficulty in securing and maintaining affordable housing. These households often have little or no savings and therefore are most at risk of becoming homeless due to sudden change in employment situation or unexpected expenses. Of the 24,565 total households in San Clemente, 10.3 percent are considered extremely low income. About 61 percent of the extremely low income households are renters and 39 percent are homeowners (see Table 2-26). Among the extremely low income owners, 80.3 percent had housing problems (including overcrowding and cost burden). Among the extremely low income renters, 83.6 percent had housing problems. Housing cost burden was the most significant housing problem among these households.

2.5.4.2 Seniors

Seniors (persons age 65 and above) are gradually becoming a more substantial segment of a community's population. Americans are living longer and having fuller lives than ever before in our history and are expected to continue to do so. Elderly households are vulnerable to housing problems due to limited income, prevalence of physical or mental disabilities, limited mobility, and high health care costs. The elderly, particularly those with disabilities, may face increased difficulty in finding housing accommodations. A senior on a fixed income can face great difficulty finding safe and affordable housing. Subsidized housing and federal housing assistance programs are increasingly challenging to secure and often involve a long waiting list.

According to the 2014-2018 ACS, 17.4 percent of all residents in San Clemente were ages 65 and over (Table 2-3). Approximately 29.3 percent of the City's households had an elderly member over 60 (Table 2-10). The 2014-2018 ACS estimates 13.6 percent of San Clemente's elderly population had at least one disability and 13.6 percent had two or more disabilities (Table 2-29). The number of elderly persons with one or more disabilities has increased slightly since the publication of the 2009-2013 ACS, which is consistent with the slight increase in elderly citywide (Table 2-3). Furthermore, approximately 15 percent of renter-occupied households and 35 percent of owner-occupied households were headed by a senior resident (Table 2-30), including 10.7 percent of households where seniors were living alone.

Table 2-29: Elderly with Disabilities (2009-2018)

Disability Status	2009-2013		2014-2018	
	Total	% of People 65+	Total	% of People 65+
With One Type of Disability	1,022	11.5%	1,537	13.6%
With Two or More Types of Disability	1,199	13.5%	1,535	13.6%
Total with a Disability	2,221	25.0%	3,072	27.2%

Source: ACS 2009-2013 and 2014-2018, Table C18108.

Table 2-30: Householders by Age and Tenure (2010-2018)

Householder Age	2010				2018			
	Owner-Occupied	%	Renter-Occupied	%	Owner-Occupied	%	Renter-Occupied	%
Under 35 years	1,126	7.3%	2,616	33.5%	602	3.7%	1,987	24.0%
35-44 years	2,916	18.9%	2,233	28.6%	2,291	14.1%	1,819	22.0%
45-54 years	3,980	25.8%	1,445	18.5%	3,323	20.4%	2,117	25.6%
55-64 years	3,378	21.9%	914	11.7%	4,425	27.2%	1,081	13.1%
65-74 years	2,005	13.0%	312	4.0%	2,959	18.2%	782	9.5%
75-84 years	1,481	9.6%	156	2.0%	1,925	11.8%	210	2.5%
85+ years	524	3.4%	133	1.7%	740	4.5%	269	3.3%
Total	15,426	100%	7,809	100%	15,525	100%	8,265	100%

Source: 2010 QT-H2; ACS 2014-2018, Table B25007.

As indicated in Table 2-31, the 2014-2018 ACS estimates that the median household income for households with a householder age 65 years or older was $74,175. This figure is significantly less than the citywide median household income of $105,812. According to the 2013-2017 CHAS data presented in Table 2-26, 62 percent of elderly renter-occupied households and 36 percent of elderly owner-occupied households experience housing cost burden. Furthermore, the majority of the City's elderly headed households were homeowners. Many may need financial assistance in making necessary repairs or accessibility improvements. The City offers a Neighborhood Revitalization Program that provides funding for housing rehabilitation. However, funding is limited. The City will pursue additional funding in the future.

Table 2-31: Median Income for Senior-Headed Households (2013-2018)

Householder Age	2009-2013	2014-2018
65+ years	$63,275	$74,175

Source: ACS 2009-2013 and 2014-2018, Table B19049.

Resources for Senior Residents

Resources available to senior San Clemente residents are listed below. Senior services in San Clemente include, but are not limited to, meal services, transportation services, case management, and heath and wellness programs.

Age Well Inc. is a non-profit organization that provides meal services, housing assistance, in-home services, and adult day health care services to homebound and low income seniors living in San Clemente and South Orange County. The community-based services provided by Age Well Inc. emphasize an integral continuum of care for their aging constituents. Their network of services includes:

- Meals on Wheels and Congregate Meal Programs
- Operation and Management of Senior Centers
- Case Management
- Non-Emergency Medical Transportation
- Health & Wellness Programs

The Dorothy Visser Senior Center provides an array of programs and services to meet the needs of senior residents. The center has a fitness room, holds classes and programs, provides special services, and has daily lunches. The center is located in Downtown San Clemente at 117 Avenida Victoria.

Senior residents in San Clemente also have options for travel within the City. The San Clemente Senior Mobility Program is available free of charge to transport residents to and from shopping centers, to the downtown area, and to the Senior Center. Group Transportation Services are also available to San Clemente's resident seniors free of charge to the San Clemente Senior Center for lunch and activities five days a week. Seniors residing in San Clemente are provided door-to-door services from home to the Senior Center. As of March 2020, the Senior Mobility Program has been suspended due to the COVID-19 pandemic. The City plans to reopen and establish services with health and safety precautions as soon as feasible based on the status of the pandemic. However, the Grocery Shopper Shuttle remains active and provides shuttle rides, free of charge, to the grocery store and back to their homes three days a week.

The San Clemente Village – Neighbors Helping Neighbors program was established in 2015. The San Clemente Village brings local residents over age 55 together and provides services such as transportation, pet assistance, handyman needs, and technology assistance. Members have access to social and educational opportunities including yoga, bridge, dine around groups, theatre outings, and cooking classes.

Senior Housing Developments

There are 270 completed rental units in three rental properties in San Clemente that are restricted for those age 55 or 62 and older, with renter qualifications not to exceed anywhere from 50 percent to 80 percent of median income. In addition to the senior housing developments listed below (Table 2-32), seniors in the City are also served by 23 State-licensed residential care facilities for the elderly and one adult residential facility, with a combined capacity to serve 309 persons. The Shorecliffs Senior Housing project, located at 510 Avenida Vaquero, was approved on March 26, 2019. The project includes a 150-unit, 4-story market-rate senior rental apartment complex and clubhouse. Although the Shorecliffs Senior Housing project has submitted for building and grading permits, the City does not know when construction is expected to begin.

Table 2-32: Senior Housing Developments

Name	Address	Units
Cotton's Point Senior Apartments	2358 South El Camino Real, San Clemente, CA 92672	76
The Presidio (formerly Casa de Seniors)	105 Avenida Presidio, San Clemente, 92672	72
Vintage Shores Apartments	366 Camino De Estrella San Clemente, California 92672	122
Shorecliffs Senior Housing (under review)	510 Avenida Vaquero	150
Total		420

Source: City of San Clemente, 2020.

2.5.4.3 Persons with Disabilities

Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment." In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and

intellectual impairments. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.[4]

The U.S. Census Bureau classifies disabilities into the following categories:

- **Hearing difficulty:** Deaf or having serious difficulty hearing
- **Vision difficulty:** Blind or having serious difficulty seeing, even when wearing glasses
- **Cognitive difficulty:** Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions
- **Ambulatory difficulty:** Having serious difficulty walking or climbing stairs
- **Self-care difficulty:** Having difficulty bathing or dressing
- **Independent living difficulty:** Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping

According to the 2014-2018 ACS, approximately 7.8 percent of the San Clemente population had one or more disabilities. Of those disabilities tallied between 2014 and 2018 (Table 2-33), hearing, ambulatory, and independent living disabilities were the most prevalent. The elderly population had a significantly larger percentage of all disability types.

Table 2-33: Disability Characteristics

Disability by Age and Type	Under 18	18 to 64 years	65 years and over	Total
Total Persons with a Disability	2.1%	7.8%	43.2%	7.8%
Disability Type				
Hearing Difficulty	0.1%	1.6%	21.7%	3.3%
Vision Difficulty	0.4%	0.7%	8.1%	1.3%
Cognitive Difficulty	1.5%	1.7%	15.0%	2.7%
Ambulatory Difficulty	0.4%	1.3%	28.1%	3.8%
Self-Care Difficulty	0.7%	0.5%	13.4%	1.6%
Independent Living Difficulty[1]	--	1.4%	22.7%	3.7%

Note: 1 – Tailored only for persons 18 years and over.
Source: ACS 2014-2018, Table S1810.

The elderly population has grown over four percent from 2010 to 2018 (Table 2-3). Since seniors have a much higher probability of being disabled, the housing and service needs for persons with disabilities should grow considerably commensurate with senior population growth.

Special housing needs for persons with disabilities fall into two general categories: physical design to address mobility impairments and in-home social, educational, and medical support to address developmental and mental impairments. The California Department of Social Services, Community Care Licensing Division reports that in San Clemente there are 23 State-licensed residential care facilities for the elderly and one adult residential facility. The City allocates CDBG funding to public service agencies that help the frail elderly remain independent in their homes. However, given the City's housing stock consisting primarily of single-family homes (69 percent) (Table 2-16) and nearly half of the units were

[4] U.S. Department of Housing and Urban Development. "Disability Rights in Housing." http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/inhousing. Accessed September 2020.

constructed prior to 1980 (Table 2-20), the availability of accessible units meeting the requirements of the Americans with Disabilities Act would be limited.

Persons with Developmental Disabilities

As defined by State law, "developmental disability" means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 18;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self- sufficiency; and
- Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. This equates to about 976 persons in the City of San Clemente based on the 2018 Census population.

The Regional Center of Orange County (RCOC) is a community-based, private nonprofit corporation funded by the State of California to serve people with developmental disabilities as required by the Lanterman Developmental Disabilities Services Act (Lanterman Act). The Lanterman Act is part of California law that sets out the rights and responsibilities of persons with developmental disabilities. RCOC is one of 21 regional centers throughout California and serves individuals and their families who reside within Orange County. The Regional Center provides diagnosis and assessment of eligibility and helps plan, access, coordinate, and monitor the services and supports that are needed because of a developmental disability. The RCOC serves approximately 19,000 residents with developmental disabilities. During the 2019-2020 FY, the Regional Center served approximately 25,000 clients. Among these clients, approximately 82 percent were residing at home with parents or guardians, 7 percent were in community care facilities, and 6 percent lived in independent or supported living. According to the State Department of Developmental Services, about 324 residents within the three ZIP Codes that generally approximate city limits (92624, 92672, and 92673) sought services from the Regional Center as of December 2020. Among these, 168 residents were adults 18 years of age or older.

2.5.4.4 Families with Children and Single-Parent Households

According to the 2014-2018 ACS approximately 29 percent of all households in San Clemente had children under the age of 18 (Table 2-10). Single-parent households often require special consideration and assistance as a result of their greater need for affordable housing, as well as accessible day care, health care, and other supportive services. Due to their relatively lower per-capita income and higher living expenses such as daycare, single-parent households have limited opportunities for finding affordable, decent, and safe housing.

In 2018, approximately 1,227 San Clemente households were single-parent households, representing five percent of the City's households (Table 2-10). In 2018, an estimated 736 households were female-headed,

single-parent households with children under age 18, representing approximately three percent of all households in the City. Single-parent female-headed households with lower incomes warrant more concern. The 2014-2018 ACS shows that approximately 11 percent of the City's female-headed households had incomes below the poverty level. By comparison, about three percent of all households had incomes below the poverty level (ACS 2014-2018, Table CP03).

Limited household income constrains the ability of single-parent households to afford adequate housing, childcare, health care, and other necessities. The City of San Clemente offers various programs for families with children. The City of San Clemente Youth Programs provide programs, activities, and classes including school site activities, recreation classes and camps, to drop-in recreation programs. The City of San Clemente's Community Center offers early childhood, youth and teen classes and after-school activities.

Single-parent households in San Clemente can also benefit from general programs and services for lower- and moderate-income persons, including the Orange County Housing Authority (OCHA) Housing Choice Voucher program, the City's Housing Rehabilitation Loan Program, and various community and social services provided by non-profit organizations in the region.

2.5.4.5 Large Households

Large households are defined as those with five or more members. These households are usually families with two or more children or families with extended family members such as in-laws or grandparents. It can also include multiple families living in one housing unit in order to save on housing costs. Large households are a special needs group because the availability of adequately sized, affordable housing units is often limited. To save for necessities such as food, clothing, and medical care, lower-and-moderate income large households may reside in smaller units, resulting in overcrowding.

As indicated in Table 2-10, nearly 10 percent of all households in San Clemente had five or more members; specifically 8.7 percent of owner-households and 13 percent of renter-households in the City were considered to be large households (Table 2-34). The proportion of large households in San Clemente (9.9 percent) was lower than at the County level (14.2 percent).

Table 2-34: Large Households by Tenure (2018)

Number of Persons in Unit	Owner-Occupied	Renter-Occupied	Total
Five	812	354	1,166
Six	550	582	1,132
Seven or more	0	52	52
Total Large Households	1,362	988	2,350
Total Households	15,618	7,595	23,213
Percent of Total Households	8.7%	13.0%	10.1%

Source: ACS 2014-2018, Table B25009.

According to the 2013-2017 CHAS data presented in Table 2-26, 63 percent of large renter-occupied households and 30 percent of large owner-occupied households experienced cost burden. As shown in Table 2-18, there are 17,164 occupied housing units with three or more bedrooms throughout the City. Approximately 66 percent of occupied housing units are owned and 34 percent are rented. Therefore, large renter-households were more likely to experience overcrowding than large owner-households.

Similar to single-parent households, large households in San Clemente can benefit from general programs and services for lower-and-moderate income persons, including the Orange County Housing Authority

Housing Choice Voucher program, the City's Housing Rehabilitation Program, and various community and social services provided by non-profit organizations in the region.

2.5.4.6 Homeless Persons

On January 4, 2012, final regulations went into effect to implement changes to the U.S. Department of Housing and Urban Development's (HUD's) definition of homelessness contained in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. The definition affects who is eligible for various HUD-funded homeless assistance programs. The definition includes four broad categories of homelessness:[5]

- People who are living in a place not meant for human habitation, in emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided.
- People who are losing their primary nighttime residence, which may include a motel or hotel or a doubled up situation, within 14 days and lack resources or support networks to remain in housing.
- Families with children or unaccompanied youth who are unstably housed and likely to continue in that state.
- People who are fleeing or attempting to flee domestic violence, have no other residence, and lack the resources or support networks to obtain other permanent housing.

This definition demonstrates the diversity of people experiencing homelessness. The City recognizes homelessness includes people who are homeless by choice, persons impacted by drugs, and persons impacted by mental conditions. The numerous locations in which people experiencing homelessness can be found complicate efforts to accurately estimate their total population. For example, an individual living with friends on a temporary basis could be experiencing homelessness, but would be unlikely to be identified in a homeless count.

The 2019 Orange County Homeless Count and Survey Report counted 6,860 homeless individuals during in Orange County, including 145 in San Clemente (Table 2-35).[6] The point-in-time count is a snapshot of how many homeless people are on streets and in emergency and transitional shelters on any given day in Orange County. The 2019 figure represents a 61 percent increase from 2013. Specifically, the point-in-time count identified 3,961 (58 percent) unsheltered and 2,899 (42 percent) sheltered homeless individuals in the County, indicating an increase in the proportion of unsheltered persons since 2013, when 39 percent of persons were estimated to be unsheltered. The City's homeless population represented about two percent of the County's overall population in 2019.

[5] U.S. Department of Housing and Urban Development. "Expanding Opportunities to House Individuals and Families Experiencing Homelessness through the Public Housing (PH) and Housing Choice Voucher (HCV) Programs: Questions and Answers (Q&As)." (September 2013).

[6] County of Orange/OC Community Services, "2019 Orange County Homeless Count and Survey Report." Previous Homeless Count reports do not contain counts by jurisdiction.

Table 2-35: Homeless Population (2013-2019)

Year	Unsheltered	Sheltered	Total
San Clemente			
2019	96	49	145
Orange County			
2019	3,961	2,899	6,860
2017	2,208	2,584	4,792
2015	2,201	2,251	4,452
2013	1,678	2,573	4,251

Orange County Homeless Count reports did not provide estimates for individual cities until recent years.

Source: Orange County Homeless Count and Survey Report, 2019.

Homeless resources available to San Clemente are presented in **Table 2-36**. Some of the services described below serve different types of low-income populations, not just homeless. Some agencies are located not within San Clemente, but nonetheless serve unhoused people who reside in San Clemente.

Table 2-36: Homeless Resources

Agency/Program	Description	Location
Emergency Shelter		
Family Assistance Ministries	Provision of emergency services including food, clothing, utility, rent, emergency shelter and women's & children's Gilchrist House.	1030 Calle Negocio San Clemente, CA 92673
Friendship Shelter's Alternative Sleeping Location (ASL)	A year-round emergency shelter with the capacity to serve 45 homeless persons per night. ASL also provides supportive services such as case management.	Laguna Canyon Road in Laguna Beach
Laura's House - Domestic Violence Program	Provision of 24-hour crisis hotline, individual and group counseling, court mandated domestic violence programs, legal services, emergency shelter, housing and clothing.	San Clemente (specific location not disclosed for safety purposes)
Community Kitchens		
The St. Michaels Society	Food pantry services available every Thursday only 3:30 - 4:30 pm.	107 W. Marquita San Clemente, CA 92672
Transitional Housing		
Henderson House	Henderson House in San Clemente provides permanent supportive housing for transitional youth.	P.O. Box 4252 Laguna Beach, CA 92652 (Mailing address only)
Gilchrist House	Provides transitional housing for women with or without children. Services to clients include life skills classes, parenting skills classes, support groups, case management, budgeting, debt management, goal setting, resource referrals and six months of aftercare follow-up.	602 Calle Canasta San Clemente, CA 92673
Family Assistance Ministries/ Home Aid Orange County	Provides transitional housing for up to eight homeless families (32 persons).	605 Calle Canasta San Clemente, CA 92673

Table 2-36: Homeless Resources

Agency/Program	Description	Location
Rental and Support Services		
Dayle McIntosh Center for the Disabled	An independent living center which provides services to individuals with any disability. Services available include peer counseling, advocacy, housing assistance, information and referral, equipment loan, employment book, independent living skills training, attendant recruitment and referral, and sensitivity training.	24012 Calle de La Plata #210 Laguna Hills, CA 92653
RIO Adult Day Health Care Center	Non-profit, licensed, Medi-Cal certified day Health Care Program that treats the health and supportive needs of older adults. Staffed with nurses, social workers, therapists, aids, activities, and administrative personnel.	2021 Calle Frontera San Clemente, CA 92673
St. Clemente's-By-The-Sea Episcopal Church	Summer Food Service Program	202 Avenida Aragon San Clemente, CA 92672
CUSD Family Resource Center & Learning Links Program	Interactive center for parents and their children from birth to five years of age. Provides daily activities, parent-child classes, information and referral to community resources, parent education workshops, and health and wellness, speech and language screenings.	1101 Calle Puente San Clemente, CA 92672
South County Outreach	Emergency services including, food, rental assistance, and job search. Transitional apartments are available to qualified applicants.	26776 Vista Terrace Lake Forest, CA 92630
Camino Health Center San Clemente	Low cost primary and general medical services.	1031 Avenida Pico, Suite 104 San Clemente, CA 92673
Salvation Army Family Services	Provides financial assistance to individuals and families. Based on funding available at each office location, the following assistance may be provided: partial rent payment assistance, partial payment assistance with one type of utility bill, prescription payment assistance, bus passes for appointments, picture IDs, clothing vouchers, and furniture vouchers for move-in purposes.	616 South El Camino Real, Suite B San Clemente, CA 92672

Source: Orange County Partnership, City of San Clemente 2020.

2.5.4.7 Farm Workers

Farm worker households tend to have high rates of poverty, live disproportionately in housing in the poorest condition, have very high rates of overcrowding, have low homeownership rates, and are predominately members of minority groups. The 2017 USDA Census of Farmworkers reported 99 farms, employing 1,772 farmworkers in Orange County.[7] Among these farms, 20 farms reported hiring migrant workers. As shown in Table 2-5, there are only 76 people employed in the agricultural industry residing San Clemente. However, farmworkers only account for a portion of the total people employed in the agricultural industry. The City has no agricultural designations in its General Plan or zoning districts in the Zoning Ordinance. While crop or tree farming is conditionally permitted in the RVL zone, no commercial farming activities are located in the City.

2.6 Publicly Assisted Housing

2.6.1 Orange County Housing Authority

The Orange County Housing Authority (OCHA) administers the Housing Choice Voucher Program (HCV) for San Clemente residents. As of September 2019, 146 San Clemente households were receiving Housing Choice Vouchers. For the distribution of voucher assistance within the City, OCHA has established local preferences such as families transitioning from shelter and care, working families, elderly or disabled, and veterans. However, OCHA's waiting list is currently closed and not accepting applications.

OCHA has established a HCV Homeownership option. Under this option, qualified HCV participants may be able to use their housing assistance subsidies for mortgage payments rather than monthly rent. The homeownership option allows first-time homeowners who meet certain qualifications to receive assistance with their monthly homeownership expenses. The high cost of homes in Orange County limits the number of homeownership opportunities. However, if homes and condominiums are priced at affordable levels, it may be possible for a participant in the HCV program to purchase a home.

2.6.2 Affordable Housing Projects

Housing developments utilizing federal, state, and/or local programs, including state and local bond programs, Low-Income Housing Tax Credits (LIHTC), density bonus, or direct assistance programs, are often restricted for use as low income housing and provide another source of affordable housing for a jurisdiction. The affordable housing projects in San Clemente are listed in Table 2-37. Together these projects provide 502 units of affordable housing.

[7] USDA Census of Agriculture 2017, Volume 1, Chapter 2: County Level Data. https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1,_Chapter_2_County_Level/California/. Accessed September 2020.

Table 2-37: Affordable Housing Projects in San Clemente

Property Name	Property Address	Funding Source	Housing Type	Total Affordable Units	Total Project Units	Placed in Service	Expiration of Affordability
Mary Erikson Community Housing	133-135 W. Canada 143 W. Marquita	HOME	Family	12	12	2004	2024
The Presidio (Casa de Seniors)	105 Avenida Presidio	Section 8	Seniors	71	72	2015	2035
Escalones Nuevos	150-152 W. Escalones	HOME/City RDA	Family	6	6	2002	2055
Vintage Shores - Senior Apartments	366 Camino de Estrella	LIHTC	Seniors	120	122	2002	2057
Talega Jamboree Apt Ph. I (Mendocino at Talega I)	123 Calle Amistad	LIHTC/HOME	Family	123	124	2003	2058
Talega Jamboree Apt Ph. II (Mendocino at Talega II)	123 Calle Amistad	LIHTC/HOME	Family	61	62	2003	2058
San Clemente Senior Apartments (Cotton's Point Senior Housing)	2358 S. El Camino Real	MHSA/City RDA	Seniors	75	76	2014	2069
Avenida Serra Apartments	107 Avenida Serra	LIHTC	Family	18	19	2015	2070
Calle Las Bolas	1608 Calle Las Bolas	Permanent Supportive Housing	Family	16	16	2019	Perpetuity
TOTAL				502	509		

2.6.2.1 Units at Risk of Converting to Market-Rate Housing

State law requires that the City identify, analyze, and propose programs to preserve existing multi-family rental units which are eligible to convert to non-low-income housing uses due to termination of subsidy contract, mortgage prepayment, or expiring use restrictions during a ten-year period commencing on the statutory deadline of the Housing Element update. Within the 2021-2031 “at-risk” housing analysis period, one project (133-135 West Canada) is considered at risk of converting to market-rate housing. This project offers 12 affordable units. In January 2021, MECH (Mary Erikson Community Housing) confirmed that 133-135 West Canada has City and County affordability covenants expiring in 2024, and that MECH would identify their needs to maintain affordability.

2.6.2.2 Preservation and Replacement Options

To maintain the existing affordable housing stock, the City works to preserve the existing assisted units or facilitate the development of new units. Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. Preservation options typically include: 1) transfer of units to non-profit ownership; 2) provision of rental assistance to tenants using other funding sources; and 3) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multi-family housing units. The following discussion highlights ways that the City’s at-risk project (133-135 West Canada) could be preserved as affordable housing.

Transfer of Ownership

Transferring ownership of an at-risk project to a non-profit housing provider is generally one of the least costly ways to ensure that the at-risk units remain affordable for the long term. By transferring property ownership to a non-profit organization, low-income restrictions can be secured and the project would become potentially eligible for a greater range of governmental assistance. The estimated market value for 133-135 West Canada is provided in Table 2-38. Mary Erickson Community Housing is nonprofit-owned.

Current market value for the units is estimated on the basis of the project's potential annual income, and operating and maintenance expenses. As indicated below, the estimated market value of 133-135 West Canada is $3.1 million. 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 this project. The actual market value at time of sale will depend on market and property conditions, and lease-out/turnover rates, among other factors.

Table 2-38: Market Value of At-Risk Housing Units

Unit Information	At-Risk Units
Two-Bedroom Units	12
Annual Operating Cost	$90,780
Gross Annual Income	$335,664
Net Annual Income	$244,884
Market Value	$3,061,050

Market value for project is estimated with the following assumptions:

1. Average market rent based on Fair Market Rents (FY 2021) established by HUD. Two-bedroom unit = $2,085.
2. Average size is assumed to be 850 square feet for a two-bedroom.
3. Annual income is calculated on a vacancy rate = 5%.
4. Annual operating expenses per square foot = $8.90.
5. Market value = Annual net project income*multiplication factor.
6. Multiplication factor for a building in good condition is 12.5.

Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. Similar to Section 8 vouchers, the City, through a variety of potential funding sources, could provide rent subsidies to tenants of at-risk units. 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 lower income household. Table 2-39 estimates the rent subsidies required to preserve the affordability of the 12 at-risk units. Based on the estimates and assumptions shown in this table, approximately $128,160 in rent subsidies would be required annually.

Table 2-39: Rental Subsidies Required

Unit Size	Total Units	Fair Market Rent	Household Size	Household Annual Income	Affordable Cost	Monthly per Unit Subsidy	Total Monthly Subsidy
Very Low Income (50% AMI)							
2-bedroom	12	$2,331	3	$57,650	$1,441	$890	$10,680

Notes:
Fair Market Rents (FMR) FY 2021 are determined by HUD.
Orange County 2020 Area Median Household Income (AMI) limits set by the California Department of Housing and Community Development (HCD).
Affordable cost = 30% of household income minus utility allowance.

Purchase of Affordability Covenants

Another option to preserve the affordability of the at-risk project is to provide an incentive package to the owner to maintain the project as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, providing a lump-sum payment, and/or supplementing the rents to market levels. The feasibility and cost of this option depends on whether the complex is too highly leveraged and interest on the owner's part to utilize the incentives found in this option. By providing lump sum financial incentives or ongoing subsides in rents or reduced mortgage interest rates to the owner, the City could ensure that some or all of the units remain affordable. While projects owned by nonprofit organizations have affordable housing as their mission and therefore the long-term use is typically not an issue, subsidies may be needed over time to subsidize the rents if Section 8 contracts are no longer available or funds are needed for rehabilitation.

Construction or Replacement of Units

The construction of new low income housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, size of the units (i.e. square footage and number of bedrooms), location, land costs, and type of construction. Estimated new construction costs for 133-135 West Canada are shown in Table 2-40. The replacement of the six at-risk units would require approximately $803,250. However, this cost estimate does not include land, permits, on- and off-site improvements, and other costs.

Table 2-40: Estimated New Construction Cost

Unit Size	(A) Total Units	(B) Estimated Average Unit Size (sq. ft.)	(C) Estimated Gross Building Size	(D) Estimated Gross Building Costs
2-bedroom	12	850	12,240	$1,606,500
Average Per Unit Cost:				$133,875

Notes:
(C) = (A) x (B) x 1.20 (i.e. 20% inflation to account for hallways and other common areas)
(D) = (C) x $105 (per square foot construction costs)* x 1.25 (i.e. 25% inflation to account for parking and landscaping costs)
Construction cost an estimate only.

Cost Comparisons

The above analysis attempts to estimate the cost of preserving the at-risk units under various options. However, because each project may have unique circumstances and therefore different options available, the direct comparison would not be appropriate. In general, providing additional incentives/subsidies to extend the affordability covenant would require the least funding over the long run, whereas the

construction of new units would be the most costly option. Over the short term, providing rent subsidies would be least costly but this option does not guarantee the long-term affordability of the units.

The cost to build new housing to replace the 12 at-risk units is high, with an estimated total cost of over $1.6 million, excluding land, on- and off-site improvements, and permit fees. When these other costs are considered, new construction is the more expensive option than transfer of ownership ($3.1 million). Both the construction of new housing and transfer of ownership would be substantially more expensive than providing rent subsidies ($128,160 annually). However, rent subsidies do not provide long-term affordable housing.

Resources for Preservation

Preservation of at-risk housing requires not only financial resources but also administrative capacity of nonprofit organizations. These resources are discussed in detail later in this Housing Element in the "Housing Resources" section.

3 Housing Constraints

3.1 Governmental Constraints

Governmental constraints are policies, standards, requirements and actions imposed by the government which affect the development and provision of housing. These constraints may include building codes, land use controls, growth management measures, development fees, processing and permit procedures, and site improvement costs. State and federal agencies play a role in the imposition of governmental constraints; however, these agencies are beyond the influence of local government and are therefore not addressed in this analysis.

3.1.1 Zoning and Fees Transparency

The City complies with the State transparency requirements for posting all zoning and development standards on the City's website:

https://www.san-clemente.org/department-services/planning-services

https://www.san-clemente.org/departments-services/building-services/permits

Information on planning permit applications, zoning information, General Plan and policy plans, and development guidelines is available online.

3.1.2 Land Use Element

Each city and county in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of a General Plan designates the general distribution, location, and extent of uses for land planned for housing, business, industry, open space, and public or community facilities. As it applies to housing, the Land Use Element establishes a range of residential land use categories, specifies densities (typically expressed as dwelling units per acre [du/ac]), and suggests the types of housing appropriate in a community.

A number of factors, governmental and non-governmental, affect the supply and cost of housing in a local housing market. The governmental factors that significantly influence these market conditions are: the allowable density range of residentially designated land; cost of housing based on regulations, including the timeframe expansion caused by Design Review Subcommittee review; environmental review; carrying costs for projects; and other regulatory factors. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce development costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing, and offer a variety of housing options that meet the needs of the community.

Table 3-1 summarizes the land use designations within the City that allow residential uses, as well as their permitted densities. The City of San Clemente provides a range of densities for single-family (up to 10 du/ac without density bonus) and multi-family (15-36 du/ac without density bonus) housing development to accommodate a range of housing options. The City has also established minimum required densities in the mixed-use and affordable housing overlay zones, which ensures that land zoned for multi-family

use, the supply of which is often limited, will be developed as efficiently as possible. Senior housing is also allowed in these overlay zones via a CUP.

In addition to the residential land use designations, the San Clemente General Plan designates appropriate areas for mixed-use development, which allows for residential developments to be integrated with retail and office uses. The Mixed-Use (MU) land use designation has several modifiers (e.g., MU 1, 2, 3, 3.1, 3.2, 3.3, and 5) designed to fine-tune maximum densities, floor area ratios and height limits to meet the objectives of specific focus areas identified in the General Plan. Focus areas that allow mixed-use residential development include North Beach/North El Camino Real, Del Mar/T-Zone, Pier Bowl, South El Camino Real (West of Interstate 5), and South El Camino Real (East of Interstate 5).

Table 3-1: General Plan Residential Land Use Designations

Land Use Designation	Corresponding Zoning District	Intention	Permitted Density (du/acre)
			Maximum
Residential Very Low	RVL	Single-family detached homes, typically in an estate setting.	1 unit per parcel
Residential Low	RL	Single-family detached homes.	7.0 per net acre
Residential Medium Low	RML	Single-family detached and attached homes, including clustered homes and townhomes.	10.0 per net acre
Residential Medium	RM	Single-family detached and attached homes, including clustered homes and townhomes, and multifamily apartments.	24.0 per net acre
Residential High	RH	Single-family attached homes, including townhomes and condominiums, and multifamily apartments.	36.0 per net acre
Mixed Use 1	MU 1	A vertical or horizontal mix of Neighborhood Serving Commercial (NC), Community Serving Commercial (CC), and multifamily housing on the second floor or higher.	36.0 per net acre
Mixed Use 2	MU 2	A vertical or horizontal mix of Neighborhood Serving Commercial (NC), Community Serving Commercial (CC), and multifamily housing.	36.0 per net acre
Mixed Use 3.0	MU 3.0	Applies to Downtown Core. A vertical or horizontal mix of Neighborhood Serving Commercial (NC) Community Serving Commercial (CC). Attached and multifamily housing is permitted on the second floor or higher.	36.0 per net acre
Mixed Use 3.1	MU 3.1	A vertical or horizontal mix of Neighborhood Serving Commercial (NC), Community Serving Commercial (CC), and multifamily housing. Also, standalone residential uses are allowed.	36.0 per net acre
Mixed Use 3.2	MU 3.2	A vertical or horizontal mix of Neighborhood Serving Commercial (NC) and multi-family housing.	24.0 per net acre

Land Use Designation	Corresponding Zoning District	Intention	Permitted Density (du/acre)
			Maximum
Mixed Use 3.3	MU 3.3	Applies to Downtown Core. A vertical or horizontal mix of Neighborhood Serving Commercial (NC) and Community Serving Commercial (CC). Attached and multifamily housing is permitted on the second floor or higher. Also, standalone residential use are allowed.	36.0 per net acre
Mixed Use 5	MU 5	Neighborhood Serving Commercial (NC) commercial uses or multi-family housing.	36.0 per net acre

Note: Density yield may be lower after accounting for streets and other improvements.
Sources: City of San Clemente General Plan, 2014 and Municipal Code, 2020.

3.1.3 Zoning Ordinance

The Zoning Ordinance is the primary tool for implementing the General Plan Land Use Element. It is designed to protect and promote public health, safety and welfare, as well as to promote quality design and quality of life. San Clemente's residential zoning districts control both the use and development standards of each residential lot or parcel, thereby influencing the development of housing. The City has established five residential zoning districts (RVL, RL, RML, RM and RH), seven mixed use districts (MU 1 – MU 5), and four commercial districts (NC 1.2, NC 1.3, NC2, and NC3) that allow for residential development. The MU zones, with the exception of MU 3.2, have a maximum density of 36 units per net acre. NC zones do not permit residential uses except if the properties fall within the Affordable Housing Overlay, in which case affordable housing projects following the RM standards (up to 24 units per acre, plus a density bonus) are permitted with a minimum of 20 units per acre.

In addition to the underlying zoning, overlay districts within the City have been identified and bestowed with special development standards and/or permit processing requirements. Overlay districts identified in the San Clemente Zoning Ordinance include: Inland Canyons, Central Business District, Coastal Zone, Architectural, Affordable Housing, Emergency Shelters, Planned Residential, and Special Residential Overlay Districts. The Mixed Use Overlay was created in 2015 as part of the General Plan update to facilitate the transition of an existing industrial area to a neighborhood with vertical or horizontal mix of commercial and residential uses, while allowing the existing industrial uses to remain as conforming uses. MU1 standards apply to the Mixed Use Overlay. Table 3-2 below lists these areas of special interest and identifies the permits required and the location of the additional regulations, in both the General Plan and the Zoning Ordinance. Standalone residential is permitted in the City's Affordable Housing Overlay and in MU 3.1, MU 3.3, and MU 5 zones.

Table 3-2: Overlay Districts

Overlay District	Area Covered	Purpose	Permits Required	Regulations
Inland Canyons	Non-coastal canyon properties identified with an "IC" on the City Zoning Map.	To preserve important topographical features and/or habitat	Depending on lot designation, may require discretionary review	Zoning Ordinance Section 17.24.060
Central Business District	Areas identified with a "CB" on the City Zoning Map.	To encourage pedestrian uses to be located in pedestrian spaces (on the street level of the project along the sidewalk/street), facilitating pedestrian activity along sidewalks and throughout the area	Uses shall be reviewed for its appropriateness in pedestrian-oriented spaces	Zoning Ordinance Section 17.56.030
Coastal Zone	The area on the ocean side of the Coastal Zone Boundary identified with a "CZ" on the City Zoning Map.	To preserve and protect coastal resources	Coastal Development Permit	Zoning Ordinance Section 17.56.050
Architectural	Properties identified with an "A" on the City Zoning Map.	To signify a visually distinct district characterized by Spanish Colonial Revival architecture and a pedestrian orientation	Site Plan and Architectural Review	Zoning Ordinance Section 17.56.020
Planned Residential	Properties identified with a "PRD" on the City Zoning Map.	To provide flexible regulations in order to foster innovation, variety, amenities, and a sensitivity to the natural topography	Site Plan Permit	Zoning Ordinance Section 17.56.040
Special Residential	Single-family neighborhoods (zoned RL) with unique development standards, identified with a numbered overlay on the Zoning Map.	Unique development standards established through the discretionary process for single-family neighborhoods	Tentative Map and/or Conditional Use Permit	Zoning Ordinance Section 17.56.060
Affordable Housing	MU 3.1, MU 5, NC 1.2, NC 1.3, NC2, and NC3 zoned properties along El Camino Real	Encourage development of affordable housing along commercial corridor	Architectural or Cultural Heritage Permit	Zoning Ordinance Section 17.56.090
Emergency Shelters	Emergency Shelters (ES) Overlay: Rancho San Clemente Business Park	To facilitate efforts to address the needs of homeless persons in the City of San Clemente.	None	Zoning Ordinance Section 17.56.100
Mixed Use	Mixed Use Overlay (MU)	To create a vertical or horizontal mix of commercial and multi-family housing, while allowing existing industrial uses to remain as conforming.	Conditional Use Permit	Zoning Ordinance Section 17.56.110 & 17.40.040

Source: San Clemente Zoning Ordinance, 2020.

3.1.3.1 Variety of Housing Opportunity

The San Clemente Zoning Ordinance provides for a range of housing types, including single-family housing, multi-family housing, accessory dwelling units, manufactured homes, and emergency shelters. Table 3-3 provides a summary of the City's Zoning Ordinance as it relates to ensuring a variety of housing opportunities.

Table 3-3: Permitted Uses

Zoning District	One- Family Dwelling	Multiple Family Dwelling	ADUs	Emergency Shelter	Mobile Home Park
RVL	C	--	P	--	C
RL	P	--	P	--	C
RML	P	P/C[1]	P	--	C
RM	P	P/C[1]	P	--	C
RH	P	P/C[1]	P	--	C
MU	--	P[2,3]	P[2,3]	--	--/C[5]
NC1.2	--	P*	P*	--	--
NC1.3	--	P*	P*	--	--
NC2	--	P*	P*	--	--
NC3	--	P*	P*	--	--
LI(MU)	--	C	P**	--	--
AH Overlay	--	P**	P**	--	--
ES Overlay	--	--	--	P	--
P=Permitted by Right; C= Conditional Use Permit Required; MC= Minor Conditional Use Permit; "—"=Not Permitted; * = Within the Affordable Housing (AH) Overlay only, ** = With housing or mixed-use project					

Notes:

1. Developments over four units require a CUP. The Zoning Code was amended in 2018 to modify the Conditional Use Permit Findings for multi-family housing (with five or more units) so that only the following findings must be made: those in subsection F.1.a and b. and a finding that the proposed use will not be detrimental to the public health and safety to properties and improvements in the vicinity.
2. Residential uses in the MU 1, MU 2, MU 3.0 zones are limited to the second floor or higher. Residential uses may be on the ground level in MU 3.1 and MU 3.3 zones. Within the Affordable Housing Overlay, dwellings that are part of an affordable housing project are permitted to be located at the street level.
3. Standalone residential permitted in MU 3.1, MU 3.3, and MU 5 zones.
4. Manufactured housing permitted with approval of a Minor Conditional Use Permit in the MU 5 zone.
5. Mobile homes permitted with approval of a Conditional Use Permit in MU 5 zone.

Source: City of San Clemente Zoning Ordinance, 2020.

Single-and Multi-Family Uses

Single-and multi-family housing types include detached and attached single-family homes, duplexes, townhomes, condominiums, and multi-family rental apartments. Single-family housing units are permitted by right in all of the City's residential zoning districts, with the exception of the RVL zone where a Conditional Use Permit (CUP) is required for this housing type. Multiple-family housing developments with four or fewer units are permitted in the City's RML, RM, and RH zones. For projects with five or more units, a CUP is required in the RML, RM, and RH zones.

To encourage the development of affordable housing, the City established an Affordable Housing (AH) Overlay where mixed income, standalone, affordable multi-family units are permitted by right in underlying commercial and mixed-use zones. AH Overlay properties are located in the City's Mixed Use (MU), NC 1.2, NC 1.3, NC2, and NC3 zones. Market-rate residential units are also permitted in the mixed-

use zones but some mixed use designations limit residential units to the floors above street level. Between 2011 and 2019, 95 affordable housing units have been constructed in the Affordable Housing Overlay.

In addition, on January 19, 2021, the City adopted the Lot Consolidation Ordinance to incentivize consolidating lots by offering by-right and optional incentives to developers who propose housing built at maximum density. Incentives offered by the Ordinance include:

- Reduced development fees;
- Partial administrative staff review;
- Increased allowable density;
- Decreased parking ratio requirements;
- Modifications to commercial FAR in Mixed Use zones;
- Reduced setbacks;
- Possibility to combine with State Density Bonus; and
- Increased lot coverage and height allowance.

The City is also considering increasing the threshold that triggers a Conditional Use Permit for projects with five or more units (see Program 14).

Accessory Dwelling Units (ADUs)

Accessory dwelling units (ADUs) units are attached or detached dwelling units that provide complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, cooking and sanitation. ADUs may be an alternative source of affordable housing for lower income households and seniors. These units typically rent for less than apartments of comparable size.

In recent years, the State has passed numerous changes to the Accessory Dwelling Unit (ADU) law to facilitate the development of ADUs. The City amended its ADU Ordinance on February 2, 2021 and again on March 9, 2019.

Manufactured Housing

State law requires local governments to permit manufactured meeting federal safety and construction standards on a permanent foundation in all single-family residential zoning districts (Section 65852.3 of the California Government Code). In San Clemente, a manufactured/factory built house is treated as single-family home and permitted by right in all residential zones where single-family homes are permitted.

Residential Care Facilities

The Lanterman Developmental Disabilities Services Act (Sections 5115 and 5116) of the California Welfare and Institutions Code declares that mentally and physically disabled persons are entitled to live in normal residential surroundings. The use of property for the care of six or fewer mentally disordered or otherwise handicapped persons is required by law. A State-authorized, certified or authorized family care home, foster home, or group home serving six or fewer persons with disabilities or dependent and neglected children on a 24-hour-a-day basis is considered a residential use to be permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes (commonly referred to as “group” homes) of six or fewer persons with disabilities than are required of the other permitted residential uses in the zone.

The City of San Clemente Zoning Ordinance contains provisions for "residential care facilities" as defined by California Health and Safety Code section 1566.3 A residential care facility may take various forms like "single housekeeping unit," "short-term lodging unit," or "boarding house." Consistent with California Health and Safety Code Section 1569 the City permits licensed residential care facilities (for six or fewer persons) by-right in all residential zones. Congregate care facilities, facilities for senior citizens, that is arranged in a group setting and includes independent living and sleeping accommodations in conjunction with shared dining and recreational facilities, are also conditionally permitted in the RML, RM, and RH districts. The City continues to monitor the Zoning Ordinance and process amendments as needed to ensure regulations are consistent with State law.

As permitted by State law, specifically the California Community Care Facilities Act and California Health and Safety Code Sections 1566.3 et al., residential care facilities for seven or more persons are conditionally permitted (in RM, RH, and MU5 zones as a boarding house), subject to the following findings:

- The proposed use is permitted within the subject zone pursuant to the approval of a Conditional Use Permit and complies with all the applicable provisions of the Zoning Ordinance, the San Clemente General Plan and the purpose and intent of the zone in which the use is being proposed.
- The site is suitable for the type and intensity of use that is proposed.
- The proposed use will not be detrimental to the public health, safety or welfare, or materially injurious to properties and improvements in the vicinity.
- The proposed use will not negatively impact surrounding land uses.

However, the City has established a Reasonable Accommodation application and process. Residential care facilities for seven or more persons with disabilities may request a Reasonable Accommodation. There is precedent for the City approving a residential care facility for seven or more persons without a Conditional Use Permit through the Reasonable Accommodation process. Using the Reasonable Accommodation reduces potential constraints of obtaining a Conditional Use Permit, especially for residential care facilities serving persons with disabilities. Consistent with State law, the City will continue to allow residential facilities serving six or fewer persons without a conditional use permit, zoning variance, or other zoning clearance.

Emergency Shelters

An emergency shelter is a facility that provides temporary shelter and feeding of indigents or disaster victims, operated by a public or non-profit agency. State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters (Section 65583(c)(1) of the Government Code). State law requires that local jurisdictions make provisions in the Zoning Ordinance to permit emergency shelters by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish standards to regulate the development of emergency shelters.

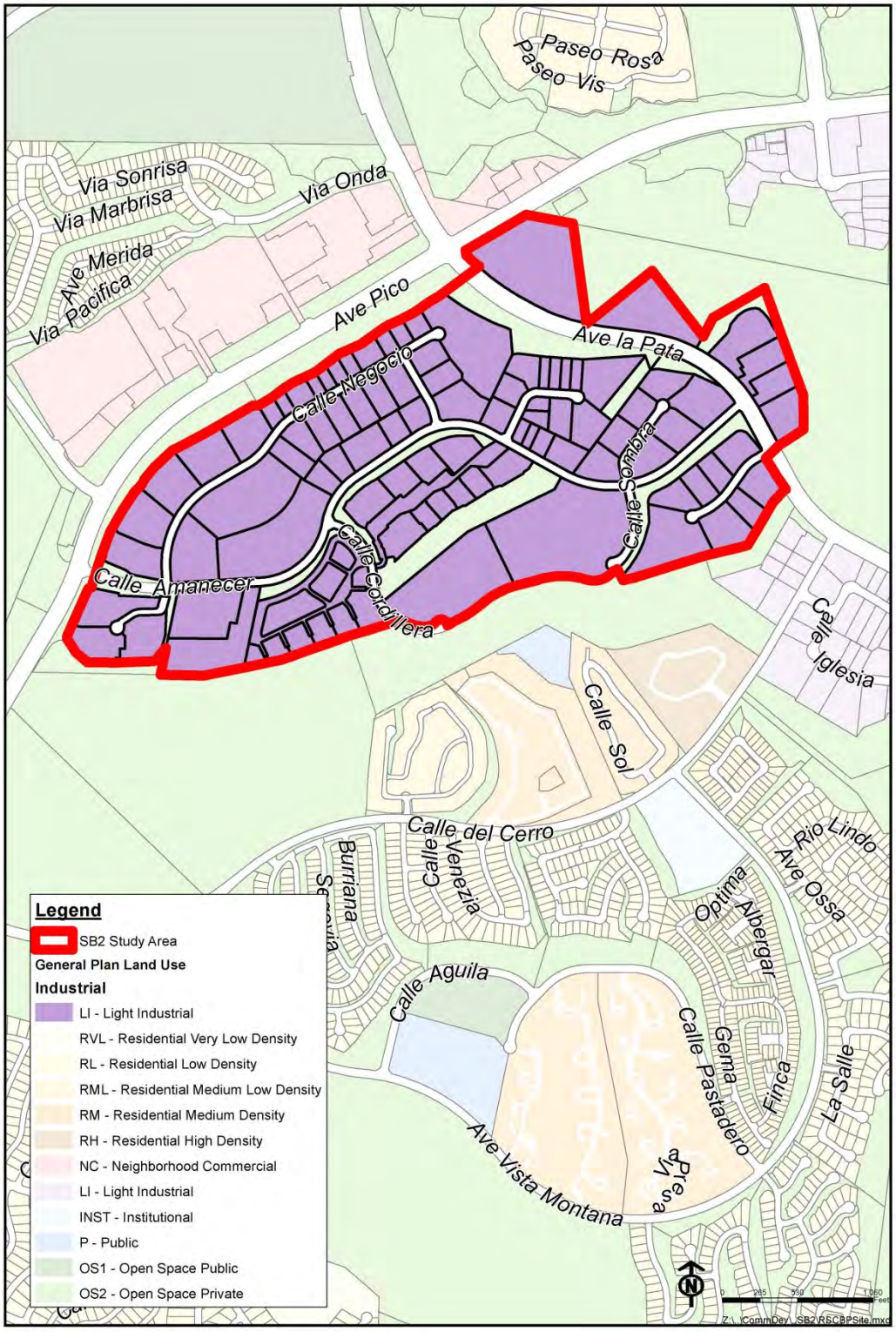
Location of the ES Overlay

On October 18, 2016, the City Council adopted the Emergency Shelter (ES) Overlay within a portion of the Rancho San Clemente Specific Plan (see Figure 3-1). In selecting the area for the ES Overlay, the following criteria were used:

- Close to public transit
- Near public services
- Near job centers

- Free from environmental constraints
- Realistic potential for development

Figure 3-1: Emergency Shelters Overlay – Rancho San Clemente Specific Plan



Capacity of the ES Overlay

State law has not established any specific standards for space per person. Appendix O of the California Building Code recommends an interior floor area of 70 square feet for one occupant with an additional 50 square feet per additional occupant over one. Consistent with dormitory style living, an average of 150 square feet is assumed per shelter bed, including space for waiting/intake areas, kitchen and eating areas, common living space, bathrooms, and storage. This average is only used as an estimate for potential building size and not a requirement in the City's Zoning Ordinance. Based on this general assumption, the ES Overlay (ESO) contains adequate capacity to accommodate at least three shelters of 35 beds each for the City's current unsheltered population of 96 persons.

The Rancho San Clemente Business Park (zoned LI) area with the ESO is comprised of 145 parcels.[8] As of March 2021, four of the parcels, totaling 24 acres, remain vacant. Two of the vacant parcels are large (over five acres) but the other two vacant parcels are 1.4 to 1.9 acres. With an allowable Floor Area Ratio (FAR) of 0.5, even the small vacant parcels can easily accommodate shelters at the maximum allowable bed limit of 35. Assuming 150 square feet per bed, a 35-bed shelter would require a building of about 5,250 square feet. The Zoning Ordinance allows one emergency shelter operator to operate more than one 35-bed emergency shelter less than 300 feet apart.

The remaining area is developed as an industrial park with a variety of business and light industrial uses such as business offices, light manufacturing and warehousing. Of those parcels with existing structures, 25 parcels have an average building size less than 10,000 square feet, 37 parcels have an average building size over 10,000 but less than 20,000 square feet, 21 parcels have an average building size over 20,000 but less than 30,000 square feet; and 12 parcels have an average building size over 30,000 square feet. The remaining parcels, while not considered vacant parcels, do not have building structures on site. These may be used as parking, storage, maintenance yards, or other purposes. Overall, 20 parcels either do not have building structures or have improvements that constituted less than 50 percent of the allowable FAR in this zone. While smaller buildings (less than 10,000 square feet) may be easier to convert into emergency shelters, there is also the potential to convert only a portion of a large warehouse facility. Adequate number of parcels/buildings in the ESO can accommodate shelters of about 5,000 square feet. Furthermore, this area typically maintains some vacancies with a range of sizes. The vacant and underutilized parcels within the ESO provide realistic capacity for development of an emergency shelter, and the services within and adjacent to the ESO provide suitable capacity.

There has been interest in establishing an emergency shelter in the ESO. In 2015, Family Assistance Ministries (FAM) proposed to install a shelter for families with children within the ESO. However, their target clients, families, would not have satisfied SB 2. In 2019, there was interest in developing a shelter in the ESO but it was found to be cost prohibitive.

Development or adaptive reuse of existing buildings and the ongoing operation of an emergency shelter requires substantial financial assistance. In the past HUD's CDBG, ESG, and Continuum of Care were the primary funding sources for emergency shelters. However, the current model of ending homelessness is through the Housing First approach – by providing Rapid Re-Housing and Permanent Supportive Housing. Funding for emergency shelters has been limited. HUD ESG grant recipients are typically metropolitan cities, urban counties, territories, and states and San Clemente is part of the Orange County Continuum of Care program. Because funding is typically provided to counties, the City of San Clemente will continue

[8] Inclusive of commercial condominiums.

to collaborate with the County, adjacent cities, and Orange County's Continuum of Care to support the acquisition of funding to house and support San Clemente's unsheltered population.

Supportive Services in the Area

The ES Overlay is located in the City's job center (see SCAG's 2020 RTP/SCS), an important consideration in establishing the overlay. Furthermore, a number of public and supportive services are located in this ES Overlay:

- City of San Clemente Community Development Department, which houses the City's Housing and Social Services Division
- Family Assistance Ministries (FAM), a nonprofit organization that offers a full housing continuum to help people stabilize including:
    - Rental and utility assistance
    - Emergency shelter for families experiencing homelessness and assistance to graduate into permanent housing
    - Gilchrist House homeless shelter for single women and mothers with children and assistance to graduate to into permanent housing
    - Permanent housing assistance through rapid rehousing and permanent supportive housing
- San Clemente Friendship Center that provides substance abuse services
- Religious organizations such as The Ark Church, Calvary Chapel, and Pacific Coast Church
- Simon Family Foundation, which was established to facilitate students with difficult life and economic circumstances to achieve college education through early intervention and intensive support
- United States Post Office
- Madhero Advanced Urgent Care

Immediately outside the ES Overlay (within half a mile), the following services are available:

- Camino Health Center is located directly across this area, within walking distance. Camino Health Center, a provider of low cost medical services for lower income persons, receives CDBG funds from the City
- Heritage Christian Fellowship
- Sovereign Healthcare, which provides substance abuse services
- A number of relatively low cost, fast food establishments, as well as grocery and convenience stores are located adjacent to the overlay area

Furthermore, other nearby facilities and services include: Rio Adult Day Health Care Center (less than one mile); Fire Station No. 59 (one mile); St. Michaels Society that offers food pantry services (2.4 miles), Salvation Army Family Services (three miles), and several churches that offer supportive services are less than three miles away. The Family Assistance Ministries (FAM) currently operates a transitional living facility for homeless women at Gilchrist House (602 Calle Canasta) and FAMily House (605 Calle Canasta),

a four-unit transitional housing for eight homeless families (up to 32 persons). Both facilities allow stays up to 90 days and are located less than four miles from the ES Overlay.

Access to Public Transportation

The ES Overlay area was previously served by OCTA bus routes 191 and 193. Due to low ridership, the OCTA Board terminated these two routes in October 2016. The bus service was replaced by "SC RIDES", a rideshare program co-sponsored by OCTA and the City of San Clemente via a cooperative agreement. The fixed-route rideshare program utilizes the same routes for Routes 191 and 193, and is open to the public and fully accessible for persons with disabilities. The service is provided during the same hours as the previous 191 and 193 routes (from 6:00 am to 8:00 pm every day of the year). The rideshare program picks up and drop off riders within 500 feet of the previous route 191/193 bus stops.

The City officially launched its ride share program on April 3, 2018. The SC RIDES program offers an on-demand option in which users can request a ride using Lyft, where rides must originate and end along the former bus routes 191 and 193 within San Clemente. Currently the users only pay $2 using a special code. The program also includes a companion service operated by Butterfli for users who need special assistance or wheelchair accessible rides. Based on the information from service providers, approximately 75 percent of homeless individuals have phones and most know someone with a phone and are able to access the service. FAM had previously confirmed that its clients are able to utilize the rideshare program to access FAM services.

The popularity and usage of the SC RIDES program increased significantly and consistently until the Pandemic hit, as shown below:

- FY 2017 (6 months) – 5,008 trips
- FY 2018 – 20,508 trips
- FY 2019 – 46,875 trips
- FY 2020 – 62,666 trips
- FY 2021 (through December 2020) – 13,690 trips

However, the ridership data does not separately identify the number of homeless persons utilizing the system. Information provided by FAM previously indicated that many FAM clients did utilize the rideshare service.

Emergency Shelter Development Standards

In September 2017, the City amended the ES Overlay Ordinance and as amended includes the following:

- **Separation**. An emergency shelter shall not be established or operated at any location less than 300 feet from another emergency shelter providing shelter and other services to homeless persons, provided, however, that this standard shall not apply where homeless shelters proposed to be located within 300 feet of each other are operated by the same social service provider.

- **Number of Emergency Shelters**. The number and capacity of emergency shelters allowed without use permit review shall be limited to that required to meet the shelter needs of the number of estimated homeless persons in the City, as established by current reliable information and approved by the City Council. This number shall be updated every two years, after the "point-in-time" counts are published for the County.

  (According to the 2019 Orange County Point-in-Time Count, the City has an unsheltered homeless of 96 persons.)

- **Maximum Number of Beds**. The maximum number of beds per emergency shelter facility shall not exceed 35 beds.
- **On-Site Waiting and Intake Areas**. On-site waiting and client intake areas shall be provided in the emergency shelter building. Outdoor waiting areas, if provided, shall be visually screened from the public right-of-way and from adjacent land uses.
- **Parking**. On-site parking shall be supplied at a ratio of not less than one vehicle space per five beds. Parking spaces shall be designed to meet City standards. Enclosed, secure bicycle parking shall be provided on-site at the ratio of not less than one bicycle parking space per 10 beds.

  (Pursuant to new State law (AB 139), the City will amend the ES Overlay to establish parking standards based on staffing level only.)
- **Site Lighting**. Site lighting shall be provided for safety and security, consistent with City standards and Design Guidelines.
- **Architectural Review**. Emergency shelters shall comply with the City's Design Guidelines. Specific Plans, and the Zoning Ordinance regarding architectural and development standards to ensure shelters are compatible with their surroundings, provide adequate privacy between uses, and minimize potential impacts of the proposed shelter on adjacent uses.

  The process to review emergency shelter compliance with these requirements shall be a ministerial review that shall be considered at the time of building permit review or business license review, whichever comes first. Emergency shelters shall be exempt from all discretionary review processes in Zoning Ordinance Chapter 17.16, in accordance with State law.

Ministerial Review

While the shelter development will be exempt from "discretionary" reviews, the shelter will still be required to submit a security and management plan (not subject to discretionary review and only a submittal requirement), and to meet applicable architectural and development standards according to the City's Architectural Design Guidelines, Specific Plan Design Guidelines, and Zoning Ordinance (as relevant). However, review of consistency will be performed ministerially at the staff level and no discretionary review or public hearing will be required.

Expansion of Emergency Shelter Overlay

During the development of the Housing Element, the City received suggestions for expanding the ES Overlay to include 10 areas of open space. These areas are located in the vicinity of the ES Overlay. However, these areas are protected by a voter initiative (Measure V) to be preserved as open space. The preservation of sensitive habitat makes these areas unsuitable and unfeasible to be included in the ES Overlay.

Both the national and statewide policy directions toward addressing homelessness focus on rapid rehousing and permanent supportive housing. Even HCD staff recognize that funding for emergency shelters has continued to decline. Nevertheless, the City will explore additional and/or alternative locations to be designated ES Overlay (see Program 15).

Low Barrier Navigation Center (LBNC)

AB 101 requires jurisdictions to allow a Low Barrier Navigation Center (LBNC) development by right in areas zoned for mixed uses and nonresidential zones permitting multi-family uses if it meets the definition. A "Low Barrier Navigation Center" is defined as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions. AB 101 also sets a timeline for jurisdictions to act on applications for Low Barrier Navigation Center developments. The requirements of this bill are effective through the end of 2026, at which point they are repealed. The Housing Plan of this Housing Element includes a program to amend the Zoning Ordinance to allow Low Barrier Navigation Centers by right in mixed use and nonresidential zones permitting multi-family uses.

Transitional and Supportive Housing

State law (AB 2634, SB 2, and SB 745) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, transitional housing means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance (California Government Code Section 65582(h)).

Supportive housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (California Government Code Sections 65582(f) and (g)).

Accordingly, State law establishes transitional and supportive housing as a residential use and therefore local governments cannot treat it differently from other similar types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). In May 2018, the San Clemente Zoning Ordinance was amended to include the definitions of Transitional and Supportive Housing as follows:

- Transitional Housing: as defined by Government Code Sections 65582(i). Transitional housing may take various forms. See, e.g., "Single housekeeping unit" and "Boarding house."
- Supportive Housing: as defined by Government Code Sections 65582(g). Supportive housing may take various forms. See, e.g., "Single housekeeping unit," and "Short-term lodging unit," "Boarding house."

Consistent with State law, transitional and supportive housing, per the definitions established in the Government Code and adopted into the City's Zoning Ordinance, is permitted as similar residential uses in the same zones. However, recent changes to State law AB 2162 require supportive housing to be permitted by right where multi-family and mixed uses are permitted. The Housing Action Plan of this Housing Element includes a program to address AB 2162.

Senior Housing

Housing that is legally allowed to be set aside for seniors is permitted in all residential zones, as well as in nonresidential and mixed use zones in the City. For senior housing in residential zones, the density must be consistent with the allowable density in the respective zone. For senior housing in nonresidential and mixed use zones, the City limits density to 45 units per acre. These density limits do not include the density bonus incentives pursuant to State law, which does not require the senior housing to be deed restricted as affordable housing. Therefore, when density bonus is applied (up to 20 percent per State law), the maximum density can reach 54 units per acre. One parking space per unit is required. However, if State density bonus is used, then the State density bonus parking standards apply.

Single-Room Occupancy (SRO)

Single-room occupancy (SRO) facilities are small studio-type units and are permitted by right in all multi-family residential districts (4 or fewer units) or with a Conditional Use Permit (5 or more units). Development standards for these uses are no more restrictive than for other uses allowed in these districts.

Farmworker and Employee Housing

The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units be treated as an agricultural use and permitted where agricultural uses are permitted.

The City does not permit agricultural uses in any of its zones and is, therefore, not required to specifically provide for farmworker housing. However, the City is still subject to the employee housing requirements of the Employee Housing Act. The City of San Clemente Zoning Ordinance was amended in 2018 to include the definition for "employee housing" as having the same meaning as it does in the California Employee Housing Act (Cal. Health & Safety Code, Div. 13, Pt. 1.).

3.1.3.2 Development Requirements

Table 3-4 summarizes the City's residential zoning districts and their requirements. The maximum number of units allowed in a multi-family residential development is determined primarily by the minimum lot area required per dwelling unit, the maximum allowable site coverage, the maximum permitted building height, and parking requirements. Of these three regulations, the minimum lot area required per dwelling unit is the most important in determining the number of units that can be developed on a site. This regulation accounts for the minimum size of the unit based on bedroom count and the necessary parking and recreational space for each unit.

Mixed-Use (MU) zones allow lot coverage between 60% and 100%. The MU 5 zone is located along South El Camino Real in the southern portion of the City. Although the 60% coverage limitation may potentially constrain mixed-use projects from achieving maximum densities along South El Camino Real, the 60% coverage limitation does not appear to constrain housing development, as evidenced by the 2020 project that resulted in seven housing units. Similarly, the maximum 33-foot height did not constrain the 2020 project from achieving the maximum density.

The Affordable Housing Overlay allows 100% residential projects where residential is not otherwise permitted. The Overlay relies on the underlying zoning designation's development standards (MU or NC/RM). Height limits range from 25 to 45 feet and lot coverage limits range from 55 to 100%. As

evidenced by 100% affordable housing projects in 2014 and 2015, these height limits and lot coverage limitations do not constrain housing development.

Table 3-4: Summary of Residential Zoning Requirements

Zoning District	Minimum Lot Area	Minimum Lot		Maximum Building Height (ft)	Minimum Front Yard (ft)	Minimum Interior Side Yard (ft.)	Minimum Street Side Yard (ft.)	Minimum Rear Yard (ft.)	Lot Coverage
		Width (ft)	Frontage (ft)						
RVL	20 acres	Varies	Lots on Linear Street: Lot Width Lots on Curvilinear Street: 35 feet	30	Varies	Varies	--	--	--
RL	6,000 sf	60		25		6[3]	10	10	50%
RML	6,000 sf[1]	60[2]						10[4]	
RM	6,000 sf	60				5		5	55%
RH	--	60		45			5		
MU 1-3.3[1]	6,000 sf	60		Varies[5]	0	0	0	0	100% (60% - MU2)
MU 5	6,000 sf	60		26-33	10	5	8	5	55%
NC1.2	4,000 sf	40			0	0	0	0	50%
NC1.3	4,000 sf	40			0	0	0	0	50%
NC2	6,000 sf	60			0	0	0	0	60%
NC3	6,000 sf	60		37-45					80%
-AH Overlay[6]	--	--		--	--	--	--	--	--
-ES Overlay	--	--		--	--	--	--	--	--

Source: City of San Clemente Zoning Ordinance, 2020

Notes:

1. Minimum Lot Area is 9,000 square feet for duplexes.
2. Minimum Lot Width is 70 feet for duplexes.
3. Or 10 percent of lot width, whichever is smaller.
4. Minimum Rear Yard is 5 feet for duplexes.
5. For lots greater than 12,000 square feet: TOR=45 ft.; PL=37 ft.; and 3 stories. For lots 12,000 square feet or less: TOR=33 ft.; PL=26 ft.; and 2 stories. An exception for 3 stories, 45 ft. to TOR, and 37 ft. to PL may be granted through the CUP process.
6. Pursuant to MU or RM development standards.

3.1.3.3 Parking Requirements

Table 3-5 summarizes residential parking requirements in San Clemente. The City determines the required number of parking spaces based on the type and size of the residential unit. The City also provides reduced parking requirements for senior housing projects and affordable housing consistent with State Density Bonus law. Because housing projects developed within the Affordable Housing Overlay must be developed with 51 percent of the units affordable to very low income households, these projects are entitled to utilize the State Density Bonus parking standards.

Table 3-5: Residential Parking Requirements

Type of Residential Development	Required Parking Spaces	
Single-Family Dwelling on a Single Lot	Two covered spaces per unit	
Two Dwelling Units on a Single Lot[1]	Two per dwelling unit, one of which must be covered	
Three or More Dwelling Units on a Single Lot	Two spaces per unit minimum or greater of the following methods per unit plus guest parking:[2]	
	Method 1: Number of BR[2]	Method 2: Net Floor Area[2]
	0—1 Bedroom: 1.5 spaces	To 900 sq. ft.: 1.5 spaces
	2 Bedrooms: 2.0 spaces	To 1,800 sq. ft.: 2.0 spaces
	3 Bedrooms: 2.5 spaces	To 2,700 sq. ft.: 2.5 spaces
	Over 3 Bedrooms: 3.0 spaces	Over 2,700 sq. ft.: 3.0 spaces
	Guest Parking: The number of guest parking spaces provided for a project shall be .333 spaces per dwelling unit.	
Accessory Dwelling Unit	One off-street parking space must be provided for the ADU if the ADU does not qualify for parking exceptions. The property owner may establish the required ADU parking in setback areas or as tandem parking on an existing driveway.	
Senior Housing Project	Two parking spaces shall be provided for manager's units. For each residential dwelling unit within a senior housing project, one covered parking space shall be provided on site. In addition, one guest parking space for each five dwelling units, including the manager's unit, shall be provided on site.	
Emergency Shelters[3]	On-site parking shall be supplied at a ratio of not less than one vehicle space per five beds.	
Affordable Housing Projects	0-1 Bedroom: 1.0 space 2-3 Bedrooms: 2.0 spaces 4+ Bedrooms: 2.5 spaces *Guest Parking:* The above parking requirements include guest parking; no additional guest parking will required.	

Source: City of San Clemente Zoning Ordinance, 2020

Notes:

1. Large Two-unit Projects which have a cumulative bedroom count which exceeds seven and/or a project net floor area which exceeds 5,400 square feet shall provide one additional parking space for the project.
2. Fifty percent of the total number of parking spaces required for the dwelling units shall be covered, with no less than one covered assigned parking space being provided for each dwelling unit. For projects with less than five units, if the total number of required parking spaces is a fractional number of .45 or greater, that number shall be rounded up to the next whole number; if the total number of required parking spaces is a fractional number less than .45, that number shall be rounded down to the next whole number. For projects with five or more units, if the total number of required parking spaces is a fractional number, the total number shall be rounded up to the nearest whole number.
3. AB139 requires that the parking standards for emergency shelters be established based on staffing level. This Housing Element includes a program to address this new requirement.

3.1.3.4 Density Bonus Ordinance

California Government Code Section 65915 provides that a local government shall grant a density bonus, and additional incentives or concessions to facilitate affordable housing development. The City of San Clemente adopted a Density Bonus Ordinance and periodically amends this ordinance (most recently in 2018) to comply with updates to State requirements. The State has recently passed several bills that made further changes to the State Density Bonus law. These include:

- AB 1763 (Density Bonus for 100 Percent Affordable Housing) – Density bonus and increased incentives for 100 percent affordable housing projects for lower income households.
- SB 1227 (Density Bonus for Student Housing) – Density bonus for student housing development for students enrolled at a full-time college, and to establish prioritization for students experiencing homelessness.
- AB 2345 (Increase Maximum Allowable Density) – Revised the requirements for receiving concessions and incentives, and the maximum density bonus provided.

The Housing Action Plan of this Housing Element includes a program for the City to amend the Zoning Ordinance to comply with State law.

3.1.3.5 Cumulative Impacts of Development Standards

Residential densities in San Clemente range from one unit per 20 acres in the RVL zone to a maximum of 36 units per acre in the RH and various MU zones, excluding potential density bonuses. The City's Affordable Housing Overlay utilizes the development standards for MU and RM zones. The City's development regulations are comparable to or more flexible than those of neighboring jurisdictions. For example, the maximum density of mixed use zones in the neighboring San Juan Capistrano is 30 units per acre with a height limit of 35 feet (two stories) and a lot coverage of 35 percent. In Mission Viejo, the highest density for mixed use is also 30 units per acre with a height limit of 35 feet (two stories) and a lot coverage of 50 percent.

The City's Affordable Housing Overlay allows between 24 and 36 units per acre with varying height limits from 26 feet (2 stories), to 33 feet, and up to three stories and 47 feet. Lot coverage in San Clemente is more flexible as well, compared to neighboring jurisdictions, from 50 to 100 percent. Local knowledge reveals that land costs are substantial enough to deter development, including housing development. While the City's land-use controls do not constrain housing, the market demand and land costs, which are out of the City's control, do impact the ability of housing development in San Clemente. In addition, funding for affordable housing is typically awarded to larger projects in bigger cities, which further constrains the competitiveness of funding applications for affordable housing development in San Clemente. The City's development standards do not constrain residential uses. Since 2013, the City has only received four applications for variances from development standards for mixed use or multi-family residential projects. These variances requested were for unique circumstances.

- 2013 – Variance for front setback for guest parking space for converting an existing four-plex to a tri-plex development. The variance was withdrawn.
- 2015 – Variance to exceed the perimeter wall height for a multi-family project. The variance was withdrawn and the project was approved.
- 2016 – Variance applied for but not required for a six-unit apartment building. The variance was withdrawn and the project was approved.
- 2019 – Variance for lot coverage to convert an existing commercial building into commercial with one residence. The project is pending.

Nevertheless, the City continues to monitor its development regulations to facilitate residential development. For example, in 2021, the City adopted a lot consolidation ordinance and is considering raising the threshold of multi-family projects requiring Conditional Use Permits (see Program 14). Specifically, the lot consolidation ordinance offers the following incentives:

By-Right Incentives:

- Increased allowable density by 25 percent;
- Increased lot coverage; and
- Reduced setbacks

One of the following optional incentives:

- Reduced development fees;
- Partial administrative staff review;
- Increased building height;
- Decreased parking ratio requirements;
- Modifications to commercial FAR in Mixed Use zones; or
- Greater increase in density.

Furthermore, to plan for the 6th cycle Regional Housing Needs Assessment (RHNA), the City has identified candidate sites for rezoning. As part of the rezoning, the City will develop appropriate objective development standards, including height, lot coverage, and parking, that would facilitate the development of housing at the allowable densities.

3.1.4 Building Codes and Enforcement

Building and safety codes are adopted to preserve public health and safety, and ensure the construction of safe and decent housing. These codes and standards also have the potential to increase the cost of housing construction or maintenance.

On January 1, 2020, the new 2019 series of the California Building Codes became effective. The City adopted the following construction codes: California Building Code (2019); California Administrative Code (2019); California Energy Code (2019); California Historical Building Code (2019); California Existing Building Code (2019); and California Referenced Standards Code (2019). The City's Building Codes, local amendments and code enforcement activities are not constraints to the development, maintenance or preservation of housing. The City did adopt modified exemptions from permits and modified fire codes pursuant to requirements of the Orange County Fire Authority. These amendments do not have a significant impact on the cost of housing.

3.1.5 Housing for Persons with Disabilities

3.1.5.1 Land Use Controls

In 2018, the City amended its Zoning Code to include provisions for residential care facilities for six or fewer persons. The City permits small residential care facilities (for six or fewer persons) by-right in the RVL, RL, RM, RMH and RH districts, similar to any single-family use. Congregate care facilities are also conditionally permitted in the RML, RM, and RH districts.

The City's adopted new rules and standards for transitory-lodging uses include traditional vacation rentals, boarding houses, sober-living homes, and large or unlicensed residential treatment facilities. Short-term rentals are defined as those renting for a period of 29 or fewer consecutive days and are subject to the

transient occupancy tax. Boarding houses, regardless of users, are conditionally permitted in RH, RM, and MU 5 zones and require a 300-foot separation between similar uses unless operated by the same social service provider.

3.1.5.2 Reasonable Accommodation

Building and development standards may constrain the ability of persons with disabilities to live in housing units that are suited to their needs. The City adopted a formal reasonable accommodation procedure in 2015. A Reasonable Modifications/Accommodations application form was created and made available on the City's website. A Reasonable Modifications/Accommodations request requires only an administrative review subject to the following:

- The development will be used by a person(s) with a disability;
- The deviation requested is necessary to make specific housing available to a person with a disability and complies with all applicable development regulations to the maximum extent feasible;
- The deviation request will not impose an undue financial or administrative burden on the City;
- The deviation request will not create a fundamental alteration in the implementation of the City's zoning regulations; and
- For coastal development in the Coastal Overlay Zone, that is not exempt from a Coastal Development Permit, there is no feasible alternative that provides greater consistency with the Coastal Zone Overlay.

3.1.5.3 Definition of Family

The City does not have a definition of "family" in its Zoning Ordinance.

3.1.5.4 Building Code

As indicated above, as of January 1, 2020 the City of San Clemente has adopted the 2019 California Building Standards Code and routinely adopts updates as they become available. The City has not adopted any special amendments to this Code that would impede housing for persons with disabilities. Special Amendments adopted relate to local climate, geological and topographical conditions. In fact, the City's building codes require that new residential construction comply with the federal American with Disabilities Act (ADA). ADA provisions include requirements for a minimum percentage of units in new developments to be fully accessible to the physical disabled. The provision of fully accessible units may increase overall project development costs, however, unlike the UBC, enforcement of ADA requirements is not at the discretion of the City, but is mandated under federal law.

Compliance with building codes and the ADA may increase the cost of housing production and can also impact the viability of rehabilitation of older properties required to be brought up to current code standards. However, these regulations provide minimum standards that must be complied with in order to ensure the development of safe and accessible housing. The City encourages and facilitates the construction of supportive housing by allowing such projects by-right in all residential zones. Current building codes require that all ground floor multi-family units be handicapped-accessible, as well as elevator-served buildings.

3.1.6 Planning and Development Fees

Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, the City of San Clemente relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed. Planning fees for San Clemente are summarized in Table 3-6. Because of limited resources, the City does not typically offer fee waivers; however, the City Council may approve a waiver, offer deferred or reduced fees, or supplement fees with funds from the In-lieu Fee Fund, for affordable housing projects.

Table 3-6: Planning and Building Fees

Application	Processing Fee	Imaging Fee	General Plan Update Fee
General Plan Amendment	Deposit	$53	28%
Variance	Deposit	$33	28%
Zone Amendment	Deposit	$26	28%
Conditional Use Permit	Deposit	$33	28%
Site Plan Permit	Deposit	$33	28%
Cultural Heritage Permit	Deposit	$26	28%
Tentative Parcel Map (Condominiums)	$2,384.22	$53	--
Tentative Parcel Map (Other Subdivision)	$3,559.25	$53	--
Tentative Tract Map	Deposit	$53	28%
Building Plan Check	65% of Building Permit Fee	--	--
Energy Plan Check	10% of Building Permit Fee	--	--
Accessibility Regulations Plan Check	10% of Building Permit Fee	--	--
Orange County Fire Authority Plan Check[3]	$650 + $15 City fee	--	--
Planning Division Plan Check	$100 for residential; $50 for minor construction (tenant improvement, accessory structures)	--	--

Source: City of San Clemente, July 1, 2020.

Notes:

1. Applications on Deposit: Initial deposits shall be determined by the City Planner with actual hourly costs consisting of expenditure of City time, materials, and overhead (including City consultants). In addition, a 28% General Plan Update fee will be charge, where applicable, not exceeding $10,000 per project.
2. Multiple-Entitlement Applications: Fees shall include the highest applicable entitlement fee, plus $500 for each additional entitlement.
3. Collected for single family homes greater than 3600 sq. ft., or more than 50 feet set back from street, or within a special fire protection area or very high fire severity zone.

Until 1978, property taxes were the primary revenue source for financing the construction of infrastructure and improvements required to support new residential development. The passage of Proposition 13 in 1978 has limited a local jurisdiction's ability to raise property taxes and significantly lowered the ad valorem tax rate, increasing reliance on other funding sources to provide infrastructure, public improvements, and public services. An alternative funding source widely used among local governments in California is the development impact fee, which is collected for a variety of improvements including water and sewer facilities, parks, and transportation improvements.

To enact an impact fee, State law requires that the local jurisdiction demonstrate the "nexus" between the type of development in question and the impact being mitigated by the proposed fee. Also, the amount of the fee must be roughly proportional to the impact caused by the development. Nevertheless, development impact fees today have become a significant cost factor in housing development.

The City of San Clemente collects development impact fees to offset impact costs associated with traffic, sewers, storm drains, and parks. In addition, the Transportation Corridor Agency collects development impact fees associated with the debt, additional improvements and operation of the toll roads.

Table 3-7 summarizes the development impact fees required by the City and local agencies for residential development. The City assesses all of its impact fees on a per unit basis, regardless of whether the housing unit is part of a single-family or multi-family project. Building Division and engineering impact fees total approximately $20,000 per unit. In addition to these fees, the Transportation Corridor Agency charges a fee per housing unit depending on housing type and project location (Table 3-7). School fees for residential uses are assessed at $4.08 per square foot regardless of type. Assuming a typical single-family home of 2,500 square feet and a typical apartment of 1,000 square feet, the school fees would total $10,200 for a single-family home and $4,080 for a multi-family unit. Overall, total planning and impact fees would amount to over $44,000 for a typical single-family unit and $35,000 for a typical multi-family unit.

Table 3-7: Development Impact Fees

Application	Fee	
Electrical Permit[1,2]	$1,211.16	
Plumbing Permit[1,2]	$1,418.00	
Mechanical Permit[1]	$625.00	
Public Facilities Construction Fund	$1,659.10	
Sewer Permit	$20 per unit	
Park Acquisition and Development	$400 per unit for "in-fill" development	
Transportation Corridor Agency Fees		
Foothill Transportation Corridor (East of Interstate 5)	Single-Family:	Multi-Family:
	$6,056 per unit	$3,536 per unit
San Joaquin Hills Corridor (West of Interstate 5)	Single-Family:	Multi-Family:
	$4,567 per unit	$2,664 per unit
School Fees	$4.08 per square foot	

Source: City of San Clemente, July 5, 2020; Transportation Corridor Agencies, 2020

Note:

1. Actual fee varies.
2. Includes fees and permit issuance fee. Permit issuance fee is $35.00 for electrical, plumbing, and mechanical (separately).

3.1.7 Local Processing and Permit Procedures

Considerable holding costs are associated with delays in processing development applications and plans. At times, these holding costs are passed through to renters and homeowners in the price/rent of housing, thus affecting the affordability. The City of San Clemente's development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Table 3-8 summarizes the reviewing authority and requirements for the City's most common permit applications.

Table 3-8: Review Authority for Permits and Entitlements

Application	Final Authority	Design Review Subcommittee Required	Public Hearing Required
Architectural Permit/Cultural Heritage Permit	Planning Commission	✓	✓
Coastal Review In-Concept	City Planner		
Conditional Use Permit	Planning Commission		✓
Development Agreements	City Council		✓
General Plan Amendment	City Council		✓
Minor Conditional Use Permit	Zoning Administrator		✓
Site Plan Permit	Planning Commission	✓	✓
Specific Plan Amendment	City Council		✓
Variance	Planning Commission	✓	✓
Zoning Amendment	City Council		✓

Source: City of San Clemente, 2020.

The City's development approval process is designed to accommodate, not hinder, development. While the process does add time and cost to development, the process does not unduly constrain housing in that the review process protects the quality of life and architectural standards of San Clemente; is not unlike the process for all California cities; and costs are minimized to the extent feasible. The following discussion describes in greater detail the City's development review procedures.

3.1.7.1 Residential Permit Processing

Please see Program 1 for analysis regarding projects that propose housing at densities below those anticipated in the sites inventory.

Ministerial Review

Residential developments with four or fewer units do not require a Conditional Use Permit (CUP), and typically do not require any other type of discretionary approval. Allowing smaller projects by right encourages the provision of affordable housing on smaller in-fill and underutilized lots within the older areas of the city. Most developments in San Clemente consist of four or fewer units as San Clemente is mostly built-out with little vacant residential land available, and typical multi-family projects are small infill developments.

Discretionary Review

Projects with five or more units require approval of a CUP by the Planning Commission. The discretionary process allows the project to be reviewed for appropriateness, scale, architecture, design, and compatibility with the surrounding area. Per the Permit Streamlining Act, the review and approval process is as follow:

- City has 30 days to determine whether a project application is complete.
- Once a project is deemed complete, it is scheduled for the City's internal Development Management Team (consisting of fire, police, public works, engineering, building & safety, landscape, and other staff), which reviews the project and recommends appropriate conditions of approval.
- A Planning Commission hearing is then scheduled. If the project is approved, an approval letter, including the conditions of approval, is sent to the applicant.
- The project only proceeds to the City Council if it also requires a legislative act such as a General Plan Amendment or Zone Change. The project approval process is identical for single-family and multiple-family residential projects.

Prior to approval of an application for a Conditional Use Permit (other than for a multi-family dwelling with five or more units), all of the following findings apply:

- The proposed use is permitted within the subject zone pursuant to the approval of a Conditional Use Permit and complies with all the applicable provisions of the Zoning Code, the San Clemente General Plan, and the purpose and intent of the zone in which the use is being proposed.
- The site is suitable for the type and intensity of use that is proposed.
- The proposed use will not be detrimental to the public health, safety or welfare, or materially injurious to properties and improvements in the vicinity.
- The proposed use will not negatively impact surrounding land uses.

Prior to approval of a Conditional Use Permit, a multi-family dwelling with five or more units, the following findings must be made in addition to those listed above:

- Proposed use will not be detrimental to the public health and safety to properties and improvements in the vicinity.

Processing Time

If a housing project does not require a discretionary approval (four or fewer dwelling units requires plan check approval only), the average processing time is three to six weeks. If the project requires a discretionary approval, the process, including legal noticing requirements, project revisions, and the generation of staff reports, typically takes 12 to 16 weeks. If the project requires a legislative act by the City Council such as a General Plan Amendment or Zoning Amendment in conjunction with the discretionary project, an additional five to six weeks is typically required for the public hearing.

Other projects requiring Zoning Amendments or other discretionary actions necessitate a higher level of review, resulting in a longer processing timeline. The City's processing and permit procedures are consistent with State Planning and Zoning Law. While processing and permit procedures add time and cost to development, they are not considered to be an unreasonable constraint on the cost or supply of housing in that such processes protect the historic and architectural integrity desired by the City.

All residential development is reviewed by City staff for zoning, building and fire code compliance prior to issuance of building permits. In addition, residential projects within an Architectural Overlay district or within 300 feet of a City designated historically significant structure will require a Cultural Heritage Permit, regardless of size.

Certain steps of the development process are required by State rather than local laws. The State has defined processing deadlines to limit the amount of time needed for review of required reports and projects. In an effort to provide an efficient permit processing system, the City has implemented the following time and cost saving developmental processes:

- Located all City divisions involved in the permitting process – Planning, Engineering, Building, Public Works, Economic Development, Business Licenses, and Fire Authority – in one location.
- Appointed a Zoning Administrator to implement discretionary approval for less significant projects.
- Facilitated pre-application meetings to ensure issues are identified early in the process and applications are complete prior to submittal for discretionary review.
- Planning staff assists non-profit agencies to determine feasibility of projects.
- Processing fees can be reduced, postponed or supplemented with housing funds for affordable projects meeting City priorities.
- Encourages concurrent processing of applications.

These procedures help to ensure that the development review process meets all legal requirements without causing a significant unwarranted constraint to housing development.

Between project approval and building permit issuance, the time lapse is typically four to 12 months and is usually a function of project applicant's ability to secure financing. In addition, projects located in the Coastal Zone typically require an additional 12 to 36 months' time lapse due to Coastal Commission review.

3.1.7.2 Environmental Review

Environmental review is required for all development projects under the California Environmental Quality Act (CEQA). San Clemente has a substantial number of environmental constraints due to its sensitive habitats, coastal location and conservative approach to preserving its unique natural surroundings. Because of these environmental constraints, larger residential projects have required the preparation of Environmental Impact Reports (EIRs). An EIR is required of all developments that have the potential of creating significant impacts that cannot be mitigated, which is highly typical of large projects approved under Specific Plans. At the same time, most residential projects in San Clemente are either Categorically Exempt or require only an Initial Study and Negative Declaration. The Negative Declaration process typically takes two to three months to complete. Categorically Exempt developments such as second dwelling units require a minimal amount of time. Projects that do not qualify for CEQA exemption do require additional time for CEQA clearance, especially when an Environmental Impact Report (EIR) is required.

3.1.7.3 Senate Bill (SB) 35

SB 35 (Government Code section 65913.4) established provisions streamline development projects with a specified proportion of affordable housing units. Streamlining allows projects to move quickly through the local government review process and restricts the ability of local governments to reject these

proposals. The bill requires a ministerial approval process, removes the requirement for CEQA analysis, and removes the requirement for discretionary entitlements.

Based on the Annual Progress Reports and progress towards the RHNA, San Clemente is currently subject to SB 35 streamlining provisions when proposed developments include at least 50% affordability. Since the adoption of Government Code Section 65913.4, the City has not received an application under SB 35 provisions. The City has included a provision in Program 2B in the Housing Element Update to prepare a checklist and written procedures for processing SB 35 applications.

3.1.8 California Coastal Act

3.1.8.1 Coastal Zone in San Clemente

The Coastal Zone is generally defined as that land and water area which extends inland 1,000 yards from the mean high tide line of the Pacific Ocean and seaward to the State's outer limit of jurisdiction. Within the City, the Coastal Zone comprises 2.79 square miles of the City's 18.45 square miles, making up 15 percent of the total land area. In 1990, 89 percent of the housing units in the City (8,542) were located in the Coastal Zone. By 2000, the number of units increased to 9,148 with an average annual growth of 60 new units a year. Between 1985 and 2005, however, ranch land development east of the Coastal Zone grew at a faster pace. Currently, housing east of the Coastal Zone makes up approximately 50 percent of the City's housing stock.

The California Coastal Act requires each local government lying wholly or partly within the State-designated Coastal Zone to prepare a Local Coastal Program (LCP). While most of the Coastal Zone is built out, the City anticipates re-use of underutilized sites, as well as regular development of the vacant lots situated in the Coastal Zone. While San Clemente does have a certified Land Use Plan, the City does not currently have a certified Implementation Plan. Therefore, in addition to local approval processes, development proposals within the Coastal Zone must also be approved by the California Coastal Commission. This additional process can add time and cost to a development proposal, and may act as a deterrent to developers of affordable housing.

The Coastal Zone includes the following six census tracts: 421.03, 421.06, 421.07, 421.08, 422.01 and 422.06. According to the 2010 Census, the population of the Coastal Zone was 27,632 persons (44 percent of the total population in the City). A number of the coastal census tracts (421.03, 421.06, 421.07, and 421.08) have also been identified as low and moderate income target areas, according to Department of Housing and Urban Development Community Development Block Grant Program (CDBG) guidelines. According to the 2018 ACS estimates, about 49 percent of households in the Coastal Zone own their homes and 51 percent rent their homes. By comparison, 66 percent of all housing units in the City were owner-occupied and 34 percent were renter-occupied. A CDBG target area and central portion of the Coastal Zone is the historic core of the City with a mix of single-family and small multi-family properties.

3.1.8.2 Housing Activities in the Coastal Zone

California Government Code §65588(d) requires that the Housing Element update take into account any low or moderate income housing provided or required in the Coastal Zone pursuant to Section 65590 (the Mello Act). State law requires that jurisdictions monitor the following:

- The number of new housing units approved for construction within the Coastal Zone (after January 1, 1982);
- The number of low or moderate income units required to be provided in new developments either within the Coastal Zone or within three miles of the Coastal Zone;

- The number of existing housing units in properties with three or more units occupied by low or moderate income households that have been authorized for demolition or conversion since January 1, 1982; and
- The number of low or moderate income replacement units required within the Coastal Zone or within three miles of the Coastal Zone.

In order to receive a demolition or a conversion permit, the request must comply with the Mello Act. The City examines any Coastal Zone development that entails the demolition or conversion of residential units that are not categorically exempt from the California Environmental Quality Act (CEQA). A property that is determined to be a public nuisance or is an owner-occupied, single-family dwelling, is not examined in accordance with the Mello Act. All other types of projects are evaluated.

Since 1982, 843 housing (as of December 2019) units have been approved for construction in the Coastal Zone. The majority of the construction activities in the Coastal Zone do not involve the demolition of multi-family units. Eight existing units occupied for very low income households were removed to accommodate the Mary Erickson project. The Mary Erickson project provided six very low income units (with larger size and more bedrooms). Therefore, the City has incurred a replacement requirement of two units. However, the City's affordable housing activities within three miles of the Coastal Zone have more than replaced the other two units removed.

A total 32 units within the Coastal Zone have been converted to condominiums since 1982. All converted properties were duplexes, with the exception of one fourplex. Duplexes are exempt from the Coastal Zone replacement requirements. The fourplex was vacant and did not house low income households prior to conversion. Therefore, no replacement requirements have been incurred as a result of the condominium conversion activities.

Table 3-9: Housing in the Coastal Zone

Housing Activities	Number of Units
Number of New Units Approved for Construction in the Coastal Zone since January 1, 1982:[1]	843 units
Total Number of Units Occupied by Low and Moderate Income Households and Authorized to be Demolished or Converted:	0 units
Total Number of Low and Moderate Income units Required to be Replaced within Three Miles of the Coastal Zone	0 units
Total Affordable Housing Activities in within three miles of the Coastal Zone:	14 units
Within the Coastal Zone:	11 units[2]
Within 3 miles of Coastal Zone:	3 units[2]

1. To December 2019
2. ADUs non-deed restricted, moderate income

3.1.8.3 Alleviating Constraints in the Coastal Zone

The Coastal Zone is subject to many development restrictions due to land use, land cost, and Mello Act compliance. As the number of vacant residential lots has decreased in the Coastal Zone, the City has to consider other options to increase the feasibility of providing low and moderate income housing within the Coastal Zone. The Coastal Act, in general, gives priority to the preservation of existing affordable housing over the production of new housing that may conflict with other coastal resource protection policies. The replacement of low income housing is mandated by the Coastal Act, which requires that any units to be demolished be replaced within three miles of the coastal zone. Currently most of the City's existing low income housing stock consists of apartments within the Coastal Zone. Due to the presence of infill lots surrounding the apartments, these areas are attractive sites for new development of apartments and condominiums, whereas conversions and demolitions of apartments are limited.

The City's Condominium Conversion Code allows conversions on an annual basis depending on the vacancy rate. When vacancy rates are above 10 percent, there are no restrictions on conversions. The California Department of Finance 2020 Housing Estimates recorded the City's overall vacancy rate at 8.4 percent. In 2005, the Condominium Conversion Code was changed to encourage additional conversions (up to 25 units) to stimulate improvements to pre-1981 apartments even when vacancy rates are below 10 percent. Even with this change in the Code, few apartments have been converted since 2000. The limited number of conversions points to the difficulty of converting apartments built before 1980. This is because pre-1980 parking standards required only a one garaged space per unit. Due to the updated parking standard, pre-1980 properties often have to convert two apartments into one. The negative impact of this Code is that fewer properties are upgraded, the streets remain overcrowded, and the prices of converted properties are very high. This Housing Element includes a program to review the City's parking standards.

3.1.8.4 Programs to Increase Affordable Housing in the Coastal Zone

The City has three programs to assist with the preservation and construction of new affordable units in the Coastal Zone. Staff has worked with Mary Erickson Community Housing to acquire and rehabilitate three properties with 18 units within the Coastal Zone since 2000. CDBG funds have also helped to rehabilitate properties owned by Laura's House, an affordable housing developer. The properties were in poor condition, overcrowded and charged high rents. HOME Investment Partnerships Program (HOME) and former redevelopment agency funds were used to purchase the units and ensure long term affordability. These apartments are now excellent examples of model properties on the block. Low income families pay affordable rent, overcrowding was eliminated, and the properties will preserve affordability in the Coastal Zone.

The second program to encourage new construction was adopted by the City Council in 2006. An Affordable Housing Overlay was established which allows vacant and underutilized commercial sites to be used for housing—a mix of affordable units (51 percent for households earning up to 50 percent of median income) and market rate units. The Affordable Housing Overlay was adopted when housing and land values were at their peak, and it was difficult to find land at a value to develop anything but high priced condominiums and single-family housing in the coastal zone. Land values in San Clemente remain very high. The Affordable Housing Overlay allows scenarios where for-profit developers may build condominiums and sell off the market rate units to the public. The affordable units will be owned by a non-profit and rented out to qualified households. This policy is intended to reduce land values enough to allow for mixed income housing in the Overlay Zone. Under new State law (AB 1397), residential projects on reuse and rezone sites, which include 20 percent affordable units for lower income households, are subject to by-right approval without discretionary review. This new requirement would offer additional opportunities for affordable units to be located within the Affordable Housing Overlay.

The third program alleviates some of the financial impact of Mello Act compliance. The City will accept an in-lieu fee for projects unable to provide on-site affordable units. The fee is based on the gap between the market rate units and the amount needed to subsidize units at 50 percent of median household income. In the past, the City has used in-lieu funds to assist non-profit developers (such as Mary Erickson Community Housing and Jamboree Housing) with the construction of new affordable units by providing grants to purchase existing apartments in the Coastal Zone or funds to finance the construction of affordable housing within three miles of the Coastal Zone (i.e. Mendocino Apartments in Talega).

3.1.8.5 City of San Clemente Land Use Regulation in the Coastal Zone

The City's Coastal Zone (CZ) follows the land use regulations of the zone in which the property is located. In addition to a zone's development standards, the following standards in Table 3-10 apply to all applicable projects within the CZ Overlay.

Table 3-10: Coastal Zone Setback Requirements

	Setback Requirement
Coastal Bluff	25 feet from bluff edge
Coastal Canyon	30 percent of the depth of the lot, not less than 15 feet from coastal sage vegetation or less than 50 feet from riparian vegetation

Note: Alternative setbacks may be considered pursuant to Zoning Code.
Source: City of San Clemente, 2020.

The purpose of the coastal standards is to protect coastal resources and reduce hazards to life and property. When there are two or more setback choices available in the standards (e.g., stringline and bluff or canyon edge setback), the City Planner determines which of the setbacks shall be applied to a

development based on the geology, soil, topography, existing vegetation, public views, adjacent development and other site characteristics, subject to the appeals provisions. Unlike other cities, San Clemente's Coastal Zone does not reduce the maximum density of units, or modify the development standards of the zone. These modified setback requirements limit the size of residential projects in the Coastal Zone when they are next to a bluff or canyon. The value of land and property is substantially higher for properties this close to the coast and affordable housing is not expected next to the bluffs or canyons. New affordable units are anticipated primarily within the Affordable Housing Overlay.

3.1.9 On-Site and Off-Site Improvements

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, and street construction and traffic control device installation that are reasonably related to the project. Ultimately, however, the additional costs for residential land development and infrastructure maintenance are borne by the homeowners and their associations. 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 local residential street in San Clemente requires a 60-foot right-of-way, with two 20-foot travel lanes. Road standards vary by roadway designation and are outlined in Table 3-11. The City's road standards are typical for cities in Orange County and do not act as a constraint to housing development.

Table 3-11: Street Design Standards

Roadway Designation	Number of Lanes	Right-of-Way Width	Curb-to-Curb Width
Major Highway	6 lanes	120 feet	100 feet
Secondary Highway	4 lanes	80 feet	64 feet
Collector Street	2 lanes	60 feet	40 feet
Local Street	2 lanes	60* feet	40 feet
Cul-de-Sac Street**	2 lanes	60* feet	Varies

Source: San Clemente Traffic Calming Policy and Resource Manual, 2006; Engineering Division Technical Standards, 2002; City of San Clemente Municipal Code, 2020.
*Municipal Code provides exceptions for Hillside areas.
**Radius of cul-de-sac bulb requires 40 feet.

3.1.10 Inclusionary Housing Program

Inclusionary housing describes a local government requirement that a specified percentage of new housing units be reserved for, and affordable to, lower and moderate income households. The goal of inclusionary housing programs is to increase the supply of affordable housing commensurate with new market-rate development. This can result in improved regional jobs-housing balances and foster greater economic and racial integration within a community. The policy is most effective in areas experiencing a strong demand for housing.

San Clemente adopted an Inclusionary Housing Program (IHP) in 1980 to expand affordable housing options in San Clemente. San Clemente's IHP requires developers of six or more units to set aside four percent of the total number of units for households earning 50 percent or less of the median income. This

affordable requirement can be provided either on-site, off-site, or through the payment of an in-lieu fee or provision of land. The in-lieu fee option was intended primarily for small to midsize in-fill developments or subdivisions where insufficient land exists to provide both for-sale and rental units. As of September 2020, approximately $1.8 million was available in the in-lieu fund to assist nonprofit agencies with purchasing land or existing housing units for the provision of long-term affordable housing.

Overall, the City's inclusionary housing requirement is reasonable compared to most communities with similar policies. Typical inclusionary housing requirements range from ten to 15 percent in the State of California. A four-percent requirement does not unduly constrain housing development in the City and small infill projects with fewer than six units are exempt from this requirement.

3.1.11 Affordable Housing Overlay Zone

The San Clemente City Council established the Affordable Housing Overlay Zone along El Camino Real, the main intra-city transportation corridor, in 2006. The Overlay allows stand-alone mixed income housing to be built in NC1.2, NC1.3, NC2, NC3, MU 3.1, MU 3.2, and MU 5-zoned properties along El Camino Real. In order to develop housing in these commercial districts, the mixed income housing must include at least 51 percent of the units as affordable housing to households earning up to 50 percent of area median income. A minimum density of 20 units per acre is required. The intent of this Overlay Zone is to facilitate the development of affordable rental and for-sale housing in the City's commercial and mixed use zones. In addition, 100 percent senior housing (whether affordable or market-rate) is also permitted in nonresidential and mixed-use zones, including in the AH Overlay Zone.

The AH Overlay offers additional sites for high density residential development in mixed use and high density areas. A number of the vacant and underutilized sites identified in Table 4-4 are located within the AH Overlay. The advantage of this overlay for affordable housing development is that it reduces the competition for limited land from market-rate developers.

The AH Overlay is already in place; properties within the AH Overlay do not have to go through additional application to utilize this designation. Mixed-income housing meeting the affordable housing requirements is a permitted use by right. The AH Overlay establishes the following minimum standards for housing projects in the various zones:

- NC 1.2, NC 1.3, NC 2 and NC 3 (Neighborhood Commercial) Zone. Affordable housing projects located in NC commercial zones shall conform to the same development standards as RM (Residential Medium Density), with the exception of incentives, concessions and density bonuses as required by Government.
- MU 3.1, MU 3.2, and MU 5 (Mixed-Use) Zone. Affordable housing projects located in the MU 3.1, MU 3.2, and MU 5 mixed-use zones shall conform to the same development standards for mixed-use projects in the MU 3.1, MU 3.2, and MU 5 zones, respectively, with the exception of incentives, concessions and density bonuses as required by Government.

An Architectural Permit is required, with the intent to preserve and strengthen the City's unique Spanish village character. The Design Review Subcommittee reviews the application and makes recommendation to the Planning Commission, the final authority. The specific required findings for new structures are:

- The architectural treatment of the project complies with the San Clemente General Plan;
- The architectural treatment of the project complies with any applicable specific plan and this Zoning Ordinance in areas including, but not limited to, height, setback, color, etc.;

- The architectural treatment of the project complies with the architectural guidelines in the City's Design Guidelines;
- The general appearance of the proposal is in keeping with the character of the neighborhood; and
- The proposal is not detrimental to the orderly and harmonious development of the City.
- If an Architectural Permit is required, additional findings apply.

The City's Design Guidelines focus on physical design features such as site design, architectural character, landscape character, parking facilities, and building equipment and services. The Design Guidelines are online and staff is available to provide assistance. As long as the development proposals adhere to the City's Design Guidelines, review by the Design Review Subcommittee usually results in only minor modifications. The typical processing time is 6 weeks from a complete application.

All multi-family housing projects constructed in the City in recent years have been affordable projects in the Affordable Housing Overlay, demonstrating the feasibility of this tool to create affordable units in the City. Given the requirements of the AH Overlay, mixed income housing projects automatically qualify for density bonus, incentives, and concessions under the State density bonus law, including reduction in parking and other development standards, as well as an increase in density bonus beyond State law. For example, Avenida Serra requested and was granted a total density increase 113 percent. Since 2011, 95 affordable housing units have been created within the AH Overlay.

The greatest incentive offered by the AH Overlay is that only senior and affordable housing projects would be allowed on the ground floor where regularly, stand-alone residential uses would not. With limited vacant and underutilized properties available in the City, the AH Overlay adds available sites for affordable housing in area designated for commercial and mixed use zones, creating new opportunities for allowable uses that incentivizes development of housing projects that could not be permissible otherwise without the overlay provisions. Therefore, this creates competition for potential buyers of property in the overlay and fosters new potential for housing with affordability covenants. Furthermore, the AH Overlay requires a minimum density of 20 units per acre, providing certainty in project feasibility. City staff also works closely with the developer to expedite the processing of affordable projects in the AH Overlay. As funding permits, the City may also assist in gap-financing affordable housing projects and/or support the developers' funding applications to local, State, and federal agencies.

3.2 Environmental and Infrastructure Constraints

3.2.1 Environmental Constraints

Environmental hazards affecting housing units include seismic hazards, flooding, toxic and hazardous waste, fire hazards and noise. The hazards discussed below may impact future development of residential units in the City. However, these are common factors that impact development throughout California. Furthermore, none of the sites included in the residential sites inventory in this Housing Element would be significantly impacted by these factors to the extent that is not mitigatable with regular construction techniques or practices. Concurrent with this Housing Element update, the City is also updating the Safety Element, pursuant to State law.

3.2.1.1 Seismic Hazards

There are no known active faults within the City of San Clemente; however, ground shaking resulting from regional seismic activity can have a significant local impact. Additionally, areas of the City where the water table is shallow with loose, unconsolidated sandy soils have the potential for liquefaction during a seismic

event. The City's hillsides and coastal and canyon bluffs can be steep and subject to landslides and slope failures. Potential geologic and soil hazards can be increased by inappropriate development, seismic activity and heavy rains.

3.2.1.2 Flooding, Tsunami, and Sea Level Rise

Potential water-related hazards in San Clemente include flooding, tsunami, and sea level rise. Flood hazards include coastal inundation, flash flooding down watercourses and channels throughout the community, and sheet flooding across low lying areas adjacent to these watercourses. A tsunami is a series of ocean waves triggered by the displacement of a large volume of water after a submarine disturbance, such as an underwater earthquake or landslide. While there is no record of large or moderate tsunamis in the San Clemente area, the potential for tsunami damage exists, as it does in most coastal California communities. Distant source tsunamis have produced run-up of less than two feet in San Clemente; however global climate changes affecting sea level have been observed over time and if observed patterns continue, a sea level rise should be expected. Sea level rise is a long-range concern and while predictions vary, a significant rise in sea level rise could adversely affect land use, transportation and water quality in low-lying coastal areas. In 2019, the City completed a Sea Level Rise Vulnerability Assessment. The City Emergency Planning Program has designated tsunami hazard zones and tsunami evacuation routes.

3.2.1.3 Fire

San Clemente residents enjoy access to and views of natural open spaces. Several neighborhoods in San Clemente are adjacent to expansive open space resources, such as the Richard and Donna O'Neill Conservancy to the north and east of City limits, and San Onofre State Beach and Camp Pendleton to the south. These large open space areas at the urban-wildland interface contain vegetation that provides fuel for wildfires which can threaten life and property in San Clemente. Wildfires are of particular concern during Santa Ana wind events, when forceful winds blow dry air from the east to the west. They create extremely dry conditions in which wildfires can easily develop due to natural or human causes. Historically, wildfire is one of the most destructive hazards in San Clemente, affecting homes, businesses, the natural environment, and human lives.

3.2.1.4 Noise

Excessive noise can adversely affect human health and well-being, economic productivity, and property values, especially in areas where sensitive land uses such as senior housing, schools, child care, and hospitals are located. Mobile and stationary noise sources contribute to overall noise levels, and the impacts of both must be analyzed when considering environmental effects of new development. Bisected by Interstate 5, San Clemente's primary noise source is from automobile, truck and motorcycle traffic. Passenger and freight rail services utilize a rail line that skirts the coastline and are also significant mobile noise sources. The City has successfully used federal tools to reduce train noise near sensitive land uses, and has earned a federal "Quiet Zone" designation at rail crossings by making federally approved safety improvements.

3.2.1.5 Radiological Hazards

The San Onofre Nuclear Generating Station (SONGS) is the only nuclear power plant in Southern California. It is located in San Diego County, approximately three miles south of the City of San Clemente. SONGS is primarily owned by Southern California Edison, which is in charge of its operations and maintenance. The plant was shut down in 2013 after replacement steam generators failed; it is currently in the process of

decommissioning. Coordination of policies and procedures for radiological hazards will continue to be relevant to the City.

3.2.1.6 Hazardous Materials

San Clemente's industrial and manufacturing uses contribute to the City's prosperity. However, these uses can pose hazards related to the use and storage of toxic materials and the creation of toxic waste as byproducts. The storage, transportation, and disposal of these materials are sensitive processes. Seismic activity, flooding, marine hazards, and fires can result in hazardous materials being released onto land or into the air and water, contaminating the environment and endangering public safety. The transportation of hazardous materials is of particular concern in San Clemente. Hazardous materials are transported through the community due to San Clemente's location along a busy rail route and along Interstate-5, a major north-south corridor for California.

3.2.2 Infrastructure Constraints

3.2.2.1 Water

The City of San Clemente draws water from several sources, including groundwater from City wells, imported water from the Metropolitan Water District through the City's wholesaler (Municipal Water District of Orange County), and production of recycled water at the City's Water Reclamation Plant. The majority of the community's potable water supply is imported through purchases from the Municipal Water District of Orange County. Three water districts serve different areas of the City—the City of San Clemente Water Utility serves the majority of the City, the Santa Margarita Water District provides water and wastewater services to the Talega community, and the South Coast Water District provides water services to a small portion of north San Clemente. The General Plan does not identify water supply as a major constraint to residential development. Adequate water is available to accommodate the City's needs through this Housing Element planning period. Furthermore, desalinization treatment facilities and other regional sources are being evaluated, which could play an important role in meeting the future water needs and supply reliability in the region.

3.2.2.2 Wastewater

Wastewater collection and treatment are important components of protecting public and environmental health. The City of San Clemente owns and operates a water treatment plant, located within the City. In 2014, the City completed a major expansion of its recycled water distribution system. With this improvement, recycled water provides a key tool in the community's strategy for reducing imported water and using water resources efficiently. The General Plan does not identify wastewater treatment as a constraint to residential development. Adequate wastewater treatment and conveyance capacity is available to accommodate the City's needs through this Housing Element planning period. Efforts to conserve water in the City over the years has yielded less wastewater flows than forecasted in the City's utilities master plan and therefore capacity has sustained despite increases in population and development.

3.3 Market Constraints

3.3.1 Land Prices

Land costs have a significant influence on the cost and availability of housing. Land prices are determined by a number of factors, most important of which are land availability and permitted development density.

As land becomes less available, the price of land increases. In coastal San Clemente, undeveloped land is very limited. As shown in Table 3-12, average unit cost of land decreases with density.

Table 3-12: Land Costs

Address	Lot Size	Density Allowed (Maximum Capacity)	Listing Price	Per Unit Land Cost
3008 La Ventana (RL-CZ)	6,481 sq. ft.	7.0 du/acre (1 unit)	$875,000	$875,000
1206 Via La Mesa (RL)	9,147 sq. ft.	7.0 du/acre (1 unit)	$499,000	$499,000
2211 S El Camino Real (NC1.2- AH)	9,487 sq. ft.	24.0 du/acre (5 units)	$699,000	$139,800

Source: Zillow, October 2020.

3.3.2 Timing and Density

Due to the high land costs, development projects in the City often approach the maximum density. Furthermore, the City's newly adopted Lot Consolidation program incentivizes the development of housing at the maximum allowable density. Program 1 addresses analysis for projects proposed at densities below those anticipated in the sites inventory.

The timing between project entitlement and building permit issuance varies though, depending on a variety of factors, such as ability of the project applicant to make corrections to construction plans, ability to secure construction financing, or investment objectives. On average, the time lapse between entitlement and building permit issuance is about four to 12 months.

3.3.3 Construction Costs

Construction costs are primarily determined by the market pricing of materials and labor costs. Construction costs depend on the type of unit being built and the quality of the product being produced. However, construction costs are set by regional and national factors that rarely impede housing development in specific localities.

3.3.4 Home Financing

The availability of financing can affect a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing, whether financed at market rate or with federal government assistance. Locally assisted mortgages (such as first-time homebuyer programs) are not subject to HMDA reporting.

Table 3-13 summarizes the disposition of loan applications submitted to financial institutions for home purchase, home refinance and home improvement loans within San Clemente in 2017. Included is information on loan applications that were originated (approved); approved but not accepted by the applicant; denied; and withdrawn by the applicant or closed for incomplete information.

Table 3-13: Mortgage Lending Approval Rates – San Clemente (2017)

Loan Type	Total Applications	Loans Originated		Approved, But Not Accepted		Applications Denied		Withdrawn or Incomplete	
Conventional	1,870	1,264	67.6%	50	2.7%	183	9.8%	373	19.9%
Government Backed	151	120	79.5%	3	2.0%	7	4.6%	21	13.9%

Home Improvement	335	200	59.7%	13	3.9%	66	19.7%	56	16.7%
Refinancing	2,612	1,588	60.8%	64	2.5%	441	16.9%	519	19.9%
Total	4,968	3,172	63.8%	130	2.6%	697	14.0%	969	19.5%

Source: Lending Patterns™, 2020.

In 2017, a total of 1,870 households applied for conventional home purchase loans in the City of San Clemente. The overall loan approval rate for this type was 70 percent and 10 percent of applicants were denied. A total of 151 households applied for government backed loans (e.g. FHA, VA) in 2017. The approval rate for this loan type was higher than for conventional home purchase loans (82 percent). About five percent of applications for government-backed loans were denied. The majority of all loan applications in San Clemente were for refinancing (53 percent). A total of 2,612 home refinance applications were filed by residents in the City in 2017. Approval rates for home refinancing were the second lowest of all loan types at 61 percent.

3.3.5 Energy Conservation

The City of San Clemente is committed to conserving energy and reducing pollution associated with the production of electricity. The City continues to require compliance with Title 24 of the California Administrative Code on the use of energy efficient appliances and insulation. Through compliance with Title 24, new residential development has produced reduced energy demands. The Green Building Code also requires new residential development to install solar panels. Furthermore, the City's Climate Action Plan and General Plan contain policies to encourage energy conservation measures.

In addition, San Clemente residents and business owners are eligible to finance energy efficient property improvement projects through the Property Assessed Clean Energy (PACE) financing program. Three PACE programs are available to San Clemente residential and commercial property owners: CaliforniaFIRST, Figtree Financing, and HERO financing. PACE programs fund a wide range of energy and water efficiency as well as energy generation projects. These include: insulation, heating/cooling systems, windows, doors, low-flow toilets, efficient irrigation systems, solar photovoltaic systems and more.

4 Housing Resources

4.1 Potential for Future Housing

State law requires that jurisdictions provide an adequate number of properly zoned sites to facilitate the production of their regional share of housing. To determine whether a jurisdiction has sufficient land to accommodate its share of regional housing needs for all income groups, that jurisdiction must identify "adequate sites." Under State law (California Government Code section 65583[c][1]), adequate sites are those with appropriate zoning designations and development regulations —with services and facilities— needed to facilitate and encourage the development of a variety of housing for all income levels. The land resources available for the development of housing in San Clemente are addressed here.

4.1.1 Regional Housing Needs Assessment (RHNA)

California General Plan law requires each city and county to have land zoned to accommodate its fair share of the regional housing need. HCD allocates a numeric regional housing goal to the Southern California Association of Governments (SCAG). SCAG is then mandated to distribute the housing goal among the cities and counties in the region. This share for the SCAG region is known as the Regional Housing Needs Assessment, or RHNA. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. The major goal of the RHNA is to assure a distribution of housing among cities and counties within the SCAG region so that every community provides for a mix of housing for all economic segments. The housing allocation targets are not building requirements; rather, they are planning goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period.

The current RHNA for the SCAG region covers an eight-year planning period (June 30, 2021 to October 15, 2029)[9] and is divided into four income categories: very low, low, moderate, and above moderate. As determined by SCAG, the City of San Clemente's allocation is 982 new housing units during this planning cycle, with the units divided among the four income categories as shown in Table 4-1.

[9] The Housing Element planning period differs from the RHNA planning period. The Housing Element covers the planning period of October 15, 2021 through October 15, 2029.

Table 4-1: RHNA 2021-2029

Income Group	Total Housing Units Allocated	Percentage of Units
Extremely/Very Low	282	28.7%
Low	164	16.7%
Moderate	188	19.1%
Above moderate	348	35.4%
Total	982	100.0%

Source: Southern California Association of Governments (SCAG).
Note: The City has a RHNA allocation of 282 very low income units (inclusive of extremely low income units. Pursuant to State law (AB 2634), the City must project the number of extremely low income housing needs based on Census income distribution or assume 50 percent of the very low income units as extremely low. Assuming an even split, the City's RHNA allocation of 282 very low income units may be divided into 141 very low and 141 extremely low income units. However, for purposes of identifying adequate sites for the RHNA allocation, State law does not mandate the separate accounting for the extremely low income category

4.1.2 Credits Toward RHNA

4.1.2.1 Anticipated Accessory Dwelling Units (ADUs)

New State laws passed since 2017 have substantially relaxed the development standards and procedures for the construction of Accessory Dwelling Units (ADUs). In March 2019, the City amended the ADU ordinance to comply with new State law, including allowing for Junior ADUs. The City permitted 19 ADUs in 2018, four ADUs in 2019, and 20 ADUs in 2020, for an average of 15 ADUs annually. The City anticipates the permitting of ADUs will increase over time. This Housing Element includes a program to proactively facilitate ADU development. Based on annual averages and increased City efforts, the City conservatively anticipates 15 units per year or 120 ADUs during the eight-year planning period between 2021 and 2029. Affordability of the potential ADUs, shown in Table 4-2, is based on SCAG's Regional Accessory Dwelling Unit Affordability Analysis as approved by HCD.

Table 4-2: Potential Accessory Dwelling Units (ADUs)

Income Level	ADUs	SCAG ADU Affordability	Remaining RHNA
Extremely Low	18	15%	123
Very Low	12	10%	129
Low	52	43%	112
Moderate	36	30%	152
Above Moderate	2	2%	346
Total	120	100%	862

Sources: City of San Clemente, 2020; SCAG Regional Accessory Dwelling Unit Affordability Analysis, 2021.

4.1.3 Residential Sites Inventory

4.1.3.1 Density and Affordability

The State has established "default" density standards for local jurisdictions. State law assumes that a density standard of 30 units per acre for suburban jurisdictions, such as San Clemente, is adequate to facilitate the production of housing affordable to lower income households. Therefore, in estimating potential units by income range, it is assumed that:

- A density of 0 to 10 units per acre (primarily for single-family homes) is assumed to facilitate housing in the above moderate income category;
- A density of 10.1 to 29 units per acre (primarily for medium density multi-family developments) is assumed to facilitate housing in the moderate income category; and
- A density of 30 or more units per acre (primarily for higher density multi-family developments) is assumed to facilitate housing in the very low and low income category. However, sites not meeting the minimum size requirement (0.5 acre) are also assumed to facilitate only moderate income housing.

Because none of the selected vacant, underutilized, or rezone sites are zoned for 10 units per acre or less, parcels that fall into the moderate income category (10.1 to 29 units per acre) will be split between moderate and above moderate income RHNA.

4.1.3.2 Methodology

Sites Selection

The City identified vacant and underutilized sites for residential development based on staff knowledge of existing conditions. Following the identification of vacant and nonvacant sites, City staff selected non-residential sites for rezone candidacy because no residentially zoned vacant sites are greater than 0.5 acres. Rezone sites were chosen based on existing uses (vacant or underutilized), location, and consolidation potential, and existing land use compatibility. The vacant, underutilized, and rezone sites are shown in Figure 4-1. For nonvacant sites, the focus was to identify sites with low existing Floor Area Ratios (FARs), building structures that are older than 30 years, and existing uses are either operating at marginal level or have surface parking areas with the potential to accommodate housing development.

Estimating Development Potential

Table 4-3 presents examples of completed projects, both market-rate and affordable. These projects demonstrate that the City's development standards are reasonable and that developers are able to achieve a range of densities to accommodate different housing types and designs. For market-rate housing, even townhome projects in the MU3.1 district were able to achieve over 95 percent of the maximum allowable density. All three of the recent affordable housing projects achieved actual development density of over 29 units per acre. Specifically, Cotton's Point was developed at almost 100 percent of the maximum allowable density, and Avenida Serra requested and was granted additional density bonus for being a 100 percent affordable project. Vintage Shores, a senior housing project funded with LIHTC, developed at a moderately high density at 29 units per acre, not utilizing any density bonus. Though some projects achieved up to 100 percent of the allowable density, several, including 412 Arenoso Lane, 253 Marquita, and the Vintage Shores Apartments, were built to less than 65 percent of the allowable density. In estimating the capacity of the City's residential sites inventory and rezone sites inventory, the potential number of units is based on 80 percent of allowable density.

4.1.3.3 Vacant and Underutilized Residential Sites Inventory

Characteristics of Underutilized Properties

The following vacant and underutilized properties are listed in Table 4-4 and are shown in Figure 4-1.

One underutilized parcel is a vacated gas station (Site L). Due to the Environmental Protection Agency's (EPA) increased regulations on Underground Storage Tanks (USTs), many old gas stations, particularly those for smaller gasoline companies, could no longer meet the federal standards for the USTs. As a result, many such gas stations have been vacated and redevelopment of these sites has become an infill development trend throughout the nation. Resources and technical guides are available to assist in the redevelopment of vacated gas stations. Specifically, both the federal and California EPA have established funding programs to assist in the cleanup. Given the limited vacant land available in San Clemente, the City views this vacated gas station as a potential site in the future. Since the 2017 Midterm Update of the Housing Element, the property owner has remediated the environmental issues associated with the site.

This area along Calle de Los Molinos (Site M) is currently developed with low intensity and older commercial and light industrial uses, and a few residences. The Los Molinos area was the original industrial area of San Clemente. An area which was once the outskirts of town in the 1920s now finds itself at the center of it. With the additional of master planned community, Marblehead Coastal, and the revitalization of the adjacent North Beach area, Los Molinos is primed to redevelop. Most of the properties were developed in the 1950s and 60s with single story developments and have been minimally remodeled. The oldest building constructed in 1939 (82 years old). These buildings do not typically have the amenities and configurations for modern day uses. In addition, the land value of the area and its close proximity to the beach and transit (approximately a mile away) have resulted in added interest for redevelopment. Businesses are relatively small independent operations. Redevelopment of these properties would not involve the strategic considerations of major chain businesses. Specifically, several of the vacant and underutilized parcels are owned by real estate investment companies. Recognizing the area's redevelopment potential, the City modified the zoning to Mixed Use to help incentivize residential development near a transit district and future entertainment district.

Buildings are primarily single-story structures with large surface parking areas. Of the 18 parcels included as Site M, seven have no building structures on site and are either vacant or used as parking or salvage yards. The existing average FAR for Site M is 0.25, significantly less than the 1.5 allowable for a mixed use development for its MU2 designation.

Site N is primarily occupied by warehouse and self-storage uses with the majority of the site being vacant. The existing average FAR at Site Q is 0.03, compared to the 2.0 allowable for a mixed use development for is LI (MU) designation that utilizes the MU1 standards. Immediately adjacent to this area are medium to high density residential uses. The significant discrepancies between allowable FAR and existing improvements on site, the location as a transition area between visitor-serving businesses and residential neighborhoods, and the small-scale business operations, along with City General Plan policy direction, encourage the future transition of these sites into a mixed use neighborhood.

Two underutilized parcels (Site F and Site G) are currently occupied by low intensity commercial uses and are immediately adjacent to vacant parcels, offering great potential for lot consolidation.

Lot Consolidation Potential

Properties in the sites inventory are grouped into sites for potential lot consolidation because of their adjacency. As shown in Figure 4-1 and Table 4-4, below, many of these parcels have common ownership, enhancing the likelihood of lot consolidation. In 2021, the City adopted a Lot Consolidation ordinance

that provides a range of incentives encouraging lot consolidation to achieve better site design and larger number of units on site. The City has also seen lot consolidation efforts to provide housing. A recent project consolidated four small parcels for the construction of a primary unit and an ADU on each lot. The project resulted in a total of eight units. Nevertheless, the City does not rely on lot consolidation to achieve its lower income RHNA. Small sites are expected to accommodate moderate income RHNA units only.

Residential Uses in Nonresidential Zones

San Clemente is a primarily built out community. However, the City recognizes that it must provide opportunities for new residential, commercial, and job-generating uses in targeted areas. Recognizing the success of the Affordable Housing Overlay in creating new residential units in nonresidential zones, the Centennial General Plan retains the existing mixed use designations and introduces a new mixed use overlay to expand opportunities for mixed use development. The City has seen an increased interest in residential development in the mixed use zones due to their proximity to services and transportation corridors. The two latest affordable housing projects have been developed in such areas also because of the preference of State and Federal funding programs to locate housing in transit-oriented areas.

The City anticipates increased residential and mixed use developments in the City's nonresidential zones (via the Affordable Housing Overlay) and in the mixed use zones for the following reasons:

- There is a general lack of vacant and underutilized land in the City.
- The General Plan incentivizes mixed use development by allowing higher FARs for mixed use than commercial projects.
    - MU1 – Commercial: 1.00 FAR; Mixed Use: 2.00 FAR
    - MU2 – Commercial: 0.50 FAR; Mixed Use: 1.50 FAR
    - MU3.0 – Commercial: 1.00 FAR; Mixed Use: 2.00 FAR
    - MU3.1 – Commercial: 1.00 FAR; Mixed Use: 2.00 FAR
    - MU3.2 – Commercial: 1.00 FAR; Mixed Use: 1.50 FAR
    - MU3.3 – Commercial: 1.00 FAR; Mixed Use: 2.00 FAR
- To encourage lot consolidation for mixed use development, the General Plan also allows an additional story for sites larger than 12,000 square feet in most mixed use zones

During the last three years, over 300 development projects of various sizes and types have been processed in the City. Only one 100 percent nonresidential development was approved in the Mixed Use areas.

Affordable Housing Overlay

The majority of parcels identified in the residential sites inventory are within this Affordable Housing (AH) Overlay. Nearly all vacant residential sites in the City are small, infill parcels located west of Interstate 5. To assist in the development of affordable housing, the City established the AH Overlay which allows for mixed income housing to be built in NC 1.2, NC 1.3, NC2, NC3, MU 3.1, MU 3.2and MU 5 zoned properties along El Camino Real, the main intra-city transportation corridor. Overall, the AH Overlay covers 21.2 acres and 243 parcels (excluding the residentially designated parcels that also allow for affordable housing development). The sites inventory in this Housing Element includes only a sample of properties within the Overlay. Additional opportunities may be available in the Overlay.

In order to develop housing in the AH Overlay, 51 percent of the units must be affordable to households earning up to 50 percent of median income. The residential development must have a minimum density of 24 units per acre. Because of the 51 percent affordable housing requirement within the Overlay, the allowable density can effectively be increased to up to 32.4 units per acre for NC properties and to 48.6

units per acre for the MU properties. Projects not providing affordable housing are not allowed in the Affordable Housing Overlay.

Several of the City's affordable housing projects are located within the AH Overlay – Vintage Shores Senior Apartments (NC3), Cotton's Point Senior Apartments (NC3), and Avenida Serra Workforce Apartments (MU3) – demonstrating the financial feasibility and development potential of locating affordable housing in the Overlay. These three projects achieved an average density of 36 units per acre.

Development Potential

Based on the City's development standards and past experience, the City's inventory of vacant and underutilized land totals 12.88 acres and has the potential to yield 320 units. Table 4-4 organizes the City's sites inventory based on potential for lot consolidation. As shown, consolidated parcels can achieve a project ranging from 4 to 91 units. The City's most recent affordable housing project – Avenida Serra Apartments – is a 19-unit project, with 58 percent of the units being affordable to extremely low and very low income households, and the other 37 percent of the units being affordable to low income households.

However, development potential available on the City's vacant and underutilized sites zoned properly for residential or mixed-use development is not adequate to accommodate the City's overall RHNA for the 6th cycle. Therefore, the City has identified additional properties within the City for rezoning for residential uses. In addition, for projects that propose housing at densities below those anticipated in the sites inventory, the City would follow Program 1.

Table 4-3: Housing Projects and Achieved Densities

Project Address (Zoning)	Total Units	Project Type	Total Buildable Lot Size (acres)	DU/AC Allowed in Zone	Density Bonus per 17.24.070	DU/AC Allowed with Bonus	Maximum Units on Site with Bonus	Project Density	Percent of Maximum Achieved
412 Arenoso Lane (RH)	23	Market-Rate Townhome	1.58	36.0	---	---	57	14.6	40.4%
253 Marquita (RM)	6	Market-Rate Townhome	0.39	24.0	---	---	9	15.4	64.1%
1520 N. El Camino Real (MU3)	16	Market-Rate Townhome	0.46	36.0[1]	---	---	17	34.8	96.6%
Vintage Shores Apartments (NC3)	122	Affordable Senior Housing	4.20	45.0[3]	20%	54.0	227	29.0	53.8%
Cotton's Point Senior Apartments (NC3)	76	Affordable Senior Housing	1.45	45.0[2]	20%	54.0	78	52.4	97.1%
Avenida Serra Workforce Apartments (MU3.1-A-AH)	19	Affordable Housing	0.37	36.0[1]	35%	48.6	18	51.4[3]	105.7%
Santiago Mixed Use (MU3.2)	7	Market Rate Apartments	0.3	24.0	---	---	7	23.3	97.2%

Notes:

1. Based on one unit/1200sf of lot area allowed in MU zones
2. NC3 qualifies for 24 DU/AC for affordable housing per 17.56.090.E; Senior housing projects in commercial zones are allowed a higher density at 45 DU/AC per 17.28.270
3. Project qualifies for additional density bonus per subsection 4(b)(iv) of 17.24.070.C. Per staff report: "A total density bonus of 113 percent (35 percent bonus allowed by right, plus an additional 78 percent density bonus) was granted for the affordable housing project."

Table 4-4: Residential Sites Inventory

Site ID	Map ID	APN	Property Address	Acres	GP	Zone	Allowable Density	Potential Units (80%)	Year Built/ Existing Use	AH Overlay	5th HE	4th HE	Common Owners	Redevelopment Potential	Afford-ability
A	1	692-131-06	Near 1201 S. El Camino Real	0.42	NC2	NC2	32.4	11	Vacant	✓	✓	✓			Moderate
B	2	692-171-18	1430 S. El Camino Real	0.22	MU3.2	MU3.2	32.4	6	Vacant	✓	✓	✓	A		Moderate
	3	692-171-19	1430 S. El Camino Real	0.22	MU3.2	MU3.2	32.4	6	Vacant	✓	✓	✓	A		Moderate
C	4	690-422-03	2211 S. El Camino Real	0.1	NC1.3	NC1.3	32.4	2	Vacant	✓	✓	✓	B		Moderate
	5	690-422-04	2213 S. El Camino Real	0.1	NC1.3	NC1.3	32.4	2	Vacant	✓	✓	✓	B		Moderate
D	6	692-362-08	1400 Calle Mirador	0.11	NC2	NC2	32.4	3	Vacant	✓	✓				Moderate
E	7	692-395-27	902 N. El Camino Real	0.27	NC2	NC2	32.4	7	Built 1962 – Rush Electrical Service (electrical repair shop)	✓	✓				Moderate
F	8	692-381-25	1300 block N. El Camino Real	0.09	RM	RM	24	2	Vacant	✓	✓	✓	C		Above Moderate
	9	692-381-26	1300 block N. El Camino Real	0.09	RM	RM	24	2	Vacant	✓	✓	✓	C		Above Moderate
	10	692-381-27	1300 block N. El Camino Real	0.09	RM	RM	24	2	Vacant	✓	✓	✓	C		Above Moderate
	11	692-381-28	1300 block N. El Camino Real	0.1	RM	RM	24	2	Vacant	✓	✓	✓	C		Above Moderate
	12	692-381-29	1300 block N. El Camino Real	0.1	RM	RM	24	2	Vacant	✓	✓	✓	C		Above Moderate
	13	692-381-30	1300 block N. El Camino Real	0.1	NC2	NC2	24	2	Vacant	✓	✓	✓	D		Above Moderate
	14	692-381-31	1200 N. El Camino Real	0.09	NC2	NC2	32.4	2	Built in 1954 – Small single-story building (insurance office) with 75% of lot unimproved; adjacent to six vacant parcels	✓	✓	✓	D	The current use is a dilapidated commercial building. There has been little to no improvements. The properties are significantly underutilized and could be developed with up to 5 units. If the lots combined with the other six adjacent vacant lots the sites could developed up to 14 units.	Moderate

Table 4-4: Residential Sites Inventory

Site ID	Map ID	APN	Property Address	Acres	GP	Zone	Allowable Density	Potential Units (80%)	Year Built/ Existing Use	AH Overlay	5th HE	4th HE	Common Owners	Redevelopment Potential	Afford-ability
G	15	692-394-06	100 W. El Portal	0.09	NC1.2	NC1.2	32.4	2	Vacant	✓	✓	✓	E		Moderate
	16	692-394-07	100 W. El Portal	0.09	NC1.2	NC1.2	32.4	2	Vacant	✓	✓	✓	E		Moderate
	17	692-394-20	100 Avenida Del Poniente	0.65	NC1.2	NC1.2	32.4	17	Built in 1957 – Low intensity strip shopping with large parking lot including Ranch Market; adjacent to two vacant parcels	✓	✓	✓		The property owner of this site had previously approached the City about development of an affordable housing development while maintaining the on-site market.	Lower
H	18	690-445-02	2200 S. El Camino Real	0.15	NC1.3	NC1.3	32.4	2	Vacant	✓	✓		F		Moderate
	19	690-445-03													
I	20	060-041-02	2400 & 2603 S. El Camino Real	0.15	NC1.3	NC1.3	32.4	2	Vacant	✓	✓				Moderate
	21	060-041-03													
J	22	057-151-26	111 La Ronda	0.17	RM	RM	24	3	Vacant		✓	✓	H		Above Moderate
	23	057-151-04	La Ronda	0.15	RM	RM	24	2	Vacant		✓	✓			Above Moderate
	24	057-151-05	La Ronda	0.16	RM	RM	24	2	Vacant		✓	✓	H		Above Moderate
K	25	690-013-01	North La Esperanza	2.18	RM	RM	24	42	Vacant	✓	✓			Multiple easements on site that may present some challenges for development. The City will assist with and/or facilitate the removal of easements.	Above Moderate
L	26	692-173-04	1502 S. El Camino Real	0.25	NC2	NC2	48.6	10	Built 1957 – Vacated gas station	✓	✓			The gas/service station has been vacated for several years. The site has been remediated since the 2017 Midterm Review of the Housing Element.	Moderate
M	27	057-182-21	105 Calle De Los Molinos	0.14	MU2	MU2	36	4	Built in 1951 – Single-story business, no longer in use		✓	Upzoned after 4th cycle HE		This small single-story building was a baseball equipment store with a batting cage facility in the back that has since been closed. The building (constructed in 1951) has had	Moderate

Table 4-4: Residential Sites Inventory

Site ID	Map ID	APN	Property Address	Acres	GP	Zone	Allowable Density	Potential Units (80%)	Year Built/ Existing Use	AH Overlay	5th HE	4th HE	Common Owners	Redevelopment Potential	Afford-ability
														minor modifications. Due to its small on-site development (849 square feet) and increase in property value since time of purchase, the project has great potential to be redeveloped.	
	28	057-182-52	109 Calle De Los Molinos	0.26	MU2	MU2	36	7	Built in 1958 – Currently 2 units on site, being used a furniture store, has been remodeled in the last 10 years		✓	Upzoned after 4th cycle HE		This is a large parcel measuring over 12,000 square feet. The property was developed in 1958 and has two buildings located onsite; a one story and a two-story building, totaling 7,287 square feet. The buildings currently house a furniture and mattress store. This parcel could accommodate up to 7 units.	Moderate
	29	057-170-22	110 Calle De Los Molinos	0.11	MU2	MU2	36	3	Vacant		✓	Upzoned after 4th cycle HE	I	The adjacent parcel located at 115 Calle De Los Molinos is owned by the same property owner. If the two parcels were merged the development could provide 7 residential units.	Moderate
	30	057-182-18	111 Calle De Los Molinos	0.11	MU2	MU2	36	2	Built in 1958 – Second-hand store		✓	Upzoned after 4th cycle HE		The parcel is currently developed with a 1,960 square foot-single story commercial building that houses a second-hand store. The building has had minimal improvements since its construction in 1958. Individually the parcel could provide 2 residential units.	Moderate
	31	057-170-21	112 Calle De Los Molinos	0.1	MU2	MU2	36	2	Built in 1951 – Small 2-story house being used as an office		✓	Upzoned after 4th cycle HE		See description of area under the "Characteristics of Underutilized Properties" subsection.	Moderate
	32	057-170-20	114 Calle De Los Molinos	0.11	MU2	MU2	36	3	Built in 1977 – Auto repairs and paint shop		✓	Upzoned after 4th cycle HE		See description of area under the "Characteristics of Underutilized Properties"	Moderate

Table 4-4: Residential Sites Inventory

Site ID	Map ID	APN	Property Address	Acres	GP	Zone	Allowable Density	Potential Units (80%)	Year Built/ Existing Use	AH Overlay	5th HE	4th HE	Common Owners	Redevelopment Potential	Afford-ability
														subsection.	
	33	057-182-19	115 Calle De Los Molinos	0.15	MU2	MU2	36	4	Built in 1948 – Single-story residence		✓	Upzoned after 4th cycle HE	I	This 840 square-foot single story residence was constructed in 1948 and has had minimal improvements. As a single-family home in a commercial and mixed use area it is anticipated that this property will redevelop in the near future. In addition the same property owner also owns three adjacent parcels. If all four of these parcels were to be developed they could develop 10 residential units.	Moderate
	34	057-170-64	116 Calle De Los Molinos	0.22	MU2	MU2	36	6	Built in 1976 – Sheet metal business		✓	Upzoned after 4th cycle HE	J	It has a single-story commercial building that is 5,760 square feet which was constructed in 1976.	Moderate
	35	057-182-10	117 Calle De Los Molinos	0.08	MU2	MU2	36	2	Built in 1939 - Used to be a surfing and appliance repair shop, but has closed and is now a drivers' education school		✓	Upzoned after 4th cycle HE	I	Same as 115 Los Molinos	Moderate
	36	057-182-11	119 Calle De Los Molinos	0.09	MU2	MU2	36	2	Built in 1965 – No building on site, parking/salvage		✓	Upzoned after 4th cycle HE	I	Same as 115 Los Molinos	Moderate
	37	057-182-12	Calle De Los Molinos	0.1	MU2	MU2	36	2	Built in 1965 – No building on site, parking/salvage		✓	Upzoned after 4th cycle HE	I	Same as 115 Los Molinos	Moderate
	38	057-170-17	120 Calle De Los Molinos	0.11	MU2	MU2	36	3	Built in 1964 – T-shirt store)		✓	Upzoned after 4th cycle HE	J	See description of area under the "Characteristics of Underutilized Properties" subsection.	Moderate
	39	057-170-16	122 Calle De Los	0.11	MU2	MU2	36	3	Built in 1962 –		✓	Upzoned		See description of area under	Moderate

Table 4-4: Residential Sites Inventory

Site ID	Map ID	APN	Property Address	Acres	GP	Zone	Allowable Density	Potential Units (80%)	Year Built/ Existing Use	AH Overlay	5th HE	4th HE	Common Owners	Redevelopment Potential	Afford-ability
			Molinos						Office building			after 4th cycle HE		the "Characteristics of Underutilized Properties" subsection.	
	40	057-170-15	124 Calle De Los Molinos	0.11	MU2	MU2	36	3	Built in 1959 – Furniture repairs		✓	Upzoned after 4th cycle HE		See description of area under the "Characteristics of Underutilized Properties" subsection.	Moderate
	41	057-170-14	126 Calle De Los Molinos	0.11	MU2	MU2	36	3	Built in 1968 – Parking lot		✓	Upzoned after 4th cycle HE	K	120-126 Calle de Los Molinos are 4 parcels developed as a parking lot in 1968. The parcels have a single owner and total approximately 19,944 square feet. If the parcels were developed with residential they could develop up to 12 dwelling units.	Moderate
	42	057-170-13	124 Calle De Los Molinos	0.11	MU2	MU2	36	3	Built in 1968 – Parking lot		✓	Upzoned after 4th cycle HE	K	See above	Moderate
	43	057-170-12	122 Calle De Los Molinos	0.11	MU2	MU2	36	3	Built in 1963 – Parking lot		✓	Upzoned after 4th cycle HE	K	See above	Moderate
	44	057-170-11	120 Calle De Los Molinos	0.12	MU2	MU2	36	3	Built in 1963 – Parking lot		✓	Upzoned after 4th cycle HE	K	See above	Moderate
N	45	057-191-57	1607 Calle Lago	0.34	LI(MU)	LI	36	10	Built in 1977 – Hair Salon		✓	Upzoned after 4th cycle HE		See description of area under the "Characteristics of Underutilized Properties" subsection. In addition, these larger parcels also have great potential for redevelopment due to the number of residential units that could be developed. For each acre 36 units could be developed by right. These three parcels alone could produce 91 units.	Moderate
	46	057-191-59	108 Calle Lago	1.46	LI(MU)	LI	36	42	Built in 1997 – Warehouse		✓	Upzoned after 4th		See above	Lower

Table 4-4: Residential Sites Inventory

Site ID	Map ID	APN	Property Address	Acres	GP	Zone	Allowable Density	Potential Units (80%)	Year Built/ Existing Use	AH Overlay	5th HE	4th HE	Common Owners	Redevelopment Potential	Afford-ability
												cycle HE			
	47	691-433-03	1623 N El Camino Real	1.35	LI(MU)	LI	36	39	Built in 1975 – Self storage		✓	Upzoned after 4th cycle HE	L	See above	Lower
O	48	058-091-16	Avenida Rosa	0.09	RM	RM	24	2	Vacant		✓			100-130 are contiguous parcels.	Above Moderate
	49	058-091-15	100 Avenida Rosa	0.09	RM	RM	24	2	Vacant		✓				Above Moderate
	50	058-091-14	100 Avenida Rosa	0.1	RM	RM	24	2	Vacant		✓		M		Above Moderate
	51	058-091-43	130 Avenida Rosa	0.09	RM	RM	24	2	Vacant		✓		M		Above Moderate
P	52	057-191-60	1801 N El Camino Real	0.74	MU1	MU1	36	22	Vacant						Lower
Q	53	057-191-31	1629 N El Camino Real	0.23	MU1	MU1	36	6	Vacant				L		Moderate
		Total		12.88				320							

4.1.3.4 Sites for Rezoning

The vacant and underutilized sites shown in Table 4-4 would not be sufficient to meet the City's RHNA alone. The vacant and underutilized sites provide 320 RHNA units and the ADU analysis provides 120 RHNA units. In addition to the Vacant and Underutilized Residential Sites Inventory and ADU assumptions, the City must consider rezoning sites to accommodate 542 RHNA units. The City identified potential candidate sites for rezoning. The current zoning of the candidate sites is industrial, mixed use, commercial, and open space. These sites are identified as candidate sites due to the current underutilized conditions. The City has proposed that these sites be rezoned to Rancho San Clemente Specific Plan (RSCSP) residential medium (RM) (15 du/ac), RM Affordable Housing Overlay (AH) (24 du/acre), residential medium high (RMH) AH (30 du/acre), Talega Specific Plan (TSP) residential high (RH) (40 du/acre), or RH AH (45 du/ac).

Most of these sites are vacant, located in areas that are transitioning, or are near existing residential uses. The same development potential methodology discussed previously was used to determine potential on these candidate sites. The non-vacant sites that were selected, specifically the sites located along Avenida Pico and Pico Plaza, are largely surface parking lots. The non-vacant sites were also selected due to closures, reduced usage, and the proximity to other residential communities. Based on the City's development standards and past experience, the City's candidate sites for rezoning total 85.17 acres and has the potential to yield 1,481 units (Table 4-6). To facilitate City Council consideration on the rezone sites, the City implemented a survey to solicit public input (see Appendix A).

Suitability of Non-Vacant Sites

The City of San Clemente is the first planned development city and, as such, contains large areas of open space with valuable habitat and natural resources. In 2008, the City voted to protect these areas in order to retain the valuable natural resources and guide development to areas planned for development, balancing the residential and commercial land use with provision of park, recreation, and open space. The areas specified for development, and in fact all of San Clemente, are designated as moderate resource areas. Therefore, all sites identified for potential rezoning are in moderate resource areas, including sites designated for lower income and above moderate income households.

Of the sites identified for potential rezoning, there are four groups of non-vacant sites:

- **Site B** is adjacent to a Target, which was constructed in 2012, and open space. The site is across the street from park and aquatic facilities, around the corner from a fire station, and along a public transportation route (the former OCTA Route 193, currently served by Lyft). The City previously received a proposal to develop the parcel with commercial. However, with declining demand for commercial/retail space, the site is prime for a mixed-use or housing development and the density can accommodate lower income housing units. The site is located in a moderate resource area and in an area of lower minority concentration (21-40 percent).
- **Sites C – P** are located in Plaza Pacifica located within the Rancho San Clemente Specific Plan. The group of sites contain and/or are adjacent to services including food, grocery, home improvement, and bank services. The sites are within and adjacent to the Job Center identified in our region's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Job Center is a Priority Growth Area, where the Southern California Association of Governments (SCAG) envisions "[m]ore and varied housing types and employment opportunities would be located in and near job centers …[and] goods and services are easily accessible …" The group of sites are also along a public transportation route (the former OCTA Route 193, currently served by Lyft). In addition to aligning with the SCAG RTP/SCS, identifying potential housing or mixed-

use opportunities on surface parking areas aligns with redevelopment trends. City staff confirmed this trend from a panel of experts through the Urban Land Institute Los Angeles Housing Element Office Hours, and through research such as the articles listed below. The sites are located in a moderate resource area and in an area of lower minority concentration (21-40 percent).

- The Latest Trend in Redevelopment: Parking Lot to Multi-Family Residential (https://www.planetizen.com/news/2020/01/108125-latest-trend-redevelopment-parking-lot-multi-family-residential)
- Are parking lots the answer to the housing shortage? (https://www.us.jll.com/en/trends-and-insights/cities/are-parking-lots-the-answer-to-the-housing-shortage)
- Carmel wants to infill U.S. 31 parking lots with mixed-use projects (https://www.dailyadvent.com/news/69ee92d5f43b256bb35cdf0711aa7793-Carmel-wants-to-infill-US-31-parking-lots-with-mixeduse-projects)
- Parking Lots, Once Asphalt Wasteland, Become Golden Opportunities (https://www.nytimes.com/2019/12/03/business/parking-lot-death-redevelopment.html#:~:text=Square%20Feet-,Parking%20Lots%2C%20Once%20Asphalt%20Wasteland%2C%20Become%20Golden%20Opportunities,owners%20of%20empty%20parking%20lots.)

- **Sites Q –S** consist of commercial and surface parking known as Pico Plaza. The sites are within the Neighborhood Mobility Area, a Priority Growth Area, identified in our region's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The group of sites are prime for mixed-use or housing redevelopment as the anchor commercial suite stands vacant and, as analyzed in SCAG's HQTA Pilot Project, the site would connect housing to services and transportation, including trails, bike routes, and a train station. The group of sites are along public transportation routes (the former OCTA Routes 191 and 193, currently served by Lyft, and Route 91). In addition to aligning with the SCAG RTP/SCS, identifying potential housing or mixed-use opportunities in underutilized commercial areas aligns with redevelopment trends. City staff confirmed this trend from a panel of experts through the Urban Land Institute Los Angeles Housing Element Office Hours, and through research not limited to the articles list below. The site is located in a moderate resource area and immediately adjacent to areas of lowest minority concentration (0-20 percent).
  - Malls to mixed-use centers and other opportunities (https://www.cnu.org/publicsquare/2019/10/08/malls-mixed-use-centers-and-other-opportunities)
  - Strip Mall Redevelopment To Become an Even Bigger Issue (https://www.useful-community-development.org/strip-mall-redevelopment.html)
- **Site V** – A developer contacted the City about development at the closed hospital at 654 Camino de los Mares. Utilizing the anticipated Housing Overlay, Site V could be built to 45 du/ac plus 7,500 square feet (sf) of commercial/medical office.

San Clemente is located at the southernmost edge of Orange County, immediately bordering San Diego County. The City's development trends, in many ways, are influenced by both counties. According to CoStar, a provider of information, analytics and marketing services to the commercial property industry, investors have been acquiring aging properties along commercial strips with the intention of converting

these properties into housing. Uses such as country clubs, auto body shops, office buildings, vacant big boxes, and old industrial facilities are target properties.[10]

As part of rezoning efforts, the City will develop objective development standards that allow developers the flexibility to achieve the allowable unit potential through a combination of redevelopment and/or adaptive reuse of existing buildings. The City has seen redevelopment of commercial uses into housing, including affordable housing. Table 4-5 shows examples of non-vacant sites used for residential development in the City as well as in nearby and similar jurisdictions. As the demand for housing continues, the City anticipates commercial sites in the City would be recycled into mixed use or high density residential uses in the next eight years.

[10] CoStar Analytics, February 7, 2022.

Table 4-5: Non-Vacant Sites Examples

Project Name/Address	Total Units	Lot Size (acres)	Zoning	Existing Use	Project Description	Status
Cotton's Point Senior Apartments (060-032-04) *San Clemente*	76	1.46	NC3	One-story commercial building and surface parking.	Project developed 76 affordable senior housing units and achieved 97.1% of maximum density.	Completed
Avenida Serra Workforce Apartments (058-073-18 & 058-073-46) *San Clemente*	19	0.10 & 0.27	MU3.1-A-AH	One-story commercial/ office building and surface parking.	Project developed 19 affordable housing units and achieved 105.7% of maximum density.	Completed
Santiago Mixed Use (692-152-23) *San Clemente*	7	0.30	MU3.2	Gasoline station and asphalt surface.	Project developed 7 apartments and achieved 97.2% of maximum density.	Completed
The Commons *Aliso Viejo*	497	9.9	MU (Mixed Use)	Surface parking and former commercial (Lowe's) site; adjacent to operating Michael's and Tuesday Morning.	Operating commercial uses will be retained in addition to proposed residential units.	Approved.
22931 Arroyo Vista 29977 Avenida De Las Banderas 30200 Avenida De Las Banderas *Rancho Santa Margarita*	344	38.4	WHO (Workforce Housing Overlay)	Office building with interested developer; underutilized surface parking.	Existing use will be retained in addition to proposed workforce housing.	Interested Developer
1925 W. Temple Street Los *Angeles*	93	--	--	Retail and office; surface parking.	Project would include demolishing existing strip mall and construction of a 93-unit apartment building including live/work units and subterranean parking.	Interested Developer
625 Valley Avenue *Solana Beach*	2	--	C (Commercial)	Commercial dentistry offices.	Redeveloped to retain dentistry office uses and parking and add two residential units.	Completed
330 S. Cedros Avenue *Solana Beach*	8	--	SC (Special Commercial)	Commercial nursery with outdoor sales and small commercial store.	Developed 8 units with ground floor commercial space and additional creative office space.	Completed
343 S. Highway 101 *Solana Beach*	25	1.95	C (Commercial)	Commercial car repair, vacant mobile home park, vacant homes, and residences converted to office.	Project included 25 residential units and 52,000 sf of commercial space including office, restaurant, and retail.	Completed
La Placita Cinco *Santa Ana*	51	2.3	--	Retail buildings	Two existing retail buildings were renovated and retained; constructed additional building with residential units and community space.	Completed

Table 4-6: Candidate Sites for Rezoning

Map ID	APN	Address	Existing Use (Year Built)	Improvement /Land Ratio (Existing FAR)	Owner	Acres	Current Zoning	Current GP Designation	Proposed GP/Zoning Changes		Afford-ability	Available Site Area for Redevelopment Based on Existing Uses
									Zone (du/ac)	Potential Units (80%)		
A	688-161-04	190 Avenida La Pata	Vacant	0.00 (0.00)	Church Cristianitos Community, Inc.	2.17	RSCSP (Business Park)	LI	RMH (30.0)	52	Lower	
B	678-161-02	990 Avenida Vista Hermosa	Commercial building and surface parking (2011)	0.72 (0.22)	Target Corporation	15.13	FRSP (NC)	NC1.2	RMH (30.0)	38*	Lower	Of the 15.13-acre site, only 3.3 acres are developed with existing uses. That leaves 11.79 acres available to add a residential component and that remaining acreage is enough to accommodate the proposed number of units. (see Figure 4-1)
C	688-021-36	907 Avenida Pico	Commercial building and surface parking (2000)	1.43 (0.26)	Lowes HIW, Inc.	10.75	RSCSP (MU)	NC1.2	RSCSP RM (15.0)	129	Above Moderate	Of the 10.74-acre site, 3.45 acres are developed with existing uses. That leaves 7.26 acres available to add a residential component by clustering the proposed number of units within the available 7.26-acre area. (see Figure 4-1)
D	688-021-37	Avenida Pico	Parking lot (2017)	0.00 (0.12)	Hong Wun Young	0.83	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	16	Above Moderate	Of the .83-acre parcel, .11 is utilized with an existing commercial building. The remaining .72 acres is a parking lot

												and may be redeveloped with a residential component to accommodate the number of units proposed. (see Figure 4-1)
E	688-021-33	911 Avenida Pico	Commercial building and surface parking (2004)	0.63 (0.22)	Edward R. Chiuminatta	0.69	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	13	Above Moderate	Of the .69-acre site, .15 acres are developed with a commercial use. The remaining .53 acres of surface parking is adequate to accommodate the proposed number of residential units.
F	688-021-34	915 Avenida Pico	Commercial building and surface parking (2000)	1.19 (0.18)	Novogroder & San Clemente, LLC	0.68	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	13	Above Moderate	Of the .68-acre site, .12 is utilized with an existing commercial structure. The remaining .56 acres could accommodate the potential number of units through redevelopment. (see Figure 4-1)
G	688-021-30	937 Avenida Pico	Commercial building and surface parking (2000)	0.60 (0.29)	The Shim Family Foundation	2.36	RSCSP (MU)	NC1.2	RSCSP RM (15.0)	28	Above Moderate	Of the 2.36 acres, .62 contain an existing building. That remaining 1.73 acres have the potential for redevelopment with the proposed number of residential units without affecting the existing uses. (see Figure 4-1)
H	688-021-14	957 Avenida Pico	Commercial building and surface parking	0.77 (0.11)	Wiles Restaurants, Inc.	0.79	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	15	Above Moderate	Of the .79-acre site, .08 is utilized. The remaining .7 acres could be

			(2000)									redeveloped to accommodate the potential number of residential units. (see Figure 4-1)
I	688-021-31	943 Avenida Pico	Commercial building and surface parking (2002)	0.51 (0.23)	Nick V. Mosich	2.18	RSCSP (MU)	NC1.2	RSCSP RM (15.0)	26	Above Moderate	Of the 2.18-acre site, .5 acres are developed with a commercial structure. The remaining 1.67 acres, which includes surface parking, could be redeveloped to accommodate the potential number of residential units without impacting the current uses. (see Figure 4-1)
J	688-021-15	951 Avenida Pico	Commercial building and surface parking (2008)	1.53 (0.23)	Walmart Real Estate Business Trust	10.48	RSCSP (MU)	NC1.2	RSCSP RM (15.0)	126	Above Moderate	Of the 10.48-acre site, 2.5 acres contains a retail building. The remaining 7.9 acres is surface parking that could be redeveloped to accommodate the potential residential units by clustering a residential development on a portion of the surface parking lot without impacting the existing commercial uses. (see Figure 4-1)
K	688-021-16	959 Avenida Pico	Commercial building and surface parking (1999)	0.37 (0.10)	Richard B. Armstrong	0.53	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	10	Above Moderate	The .53-acre site is utilized with .05-acres of a commercial structure. The

												addition of the proposed number of residential units can be accommodated within the remaining .47 acres by redeveloping the surface parking. (see Figure 4-1)
L	688-021-17	963 Avenida Pico	Commercial building and surface parking (1999)	0.63 (0.16)	SRH Management, Inc.	0.56	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	11	Above Moderate	Of the .56-acre site, .08 is currently developed with a commercial structure The remaining .47 acres can accommodate the proposed number of residential units through redevelopment of surface parking. (see Figure 4-1)
M	688-131-22	979 Avenida Pico	Commercial building and surface parking (2000)	0.57 (0.28)	45 Plaza Association, LLC	2.43	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	47	Moderate	The 2.43-acre site is developed with .72 acres of commercial building. The proposed number of units can be accommodated within the remaining 1.7 acres of unutilized surface parking area by concentrating the redevelopment on a portion of the lot without impacting existing uses. (see Figure 4-1)
N	688-131-21	989 Avenida Pico	Commercial building and surface parking (2002)	1.00 (0.21)	ABS CA-O, LLC	6.42	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	123	Moderate	Only 1.4 acres of the 6.42-acre site is developed with a commercial building. The remaining 4.99 acres of the

												property, which consists of surface parking, could be redeveloped to accommodate the proposed number of residential uses without impacting the existing commercial uses. (see Figure 4-1)
O	688-021-18	965 Avenida Pico	Commercial building and surface parking (2004)	0.43 (0.17)	Bank of America NA	0.74	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	14	Moderate	The .74-acre site is utilized with .13 acres of a commercial building. The remaining .6 acres, which includes surface parking, could accommodate the proposed number of residential units through redevelopment of the surface parking area without impacting the existing building. (see Figure 4-1)
P	688-131-20	993 Avenida Pico	Commercial building and surface parking (2003)	0.49 (0.23)	Stephen C. Huang	2	RSCSP (MU)	NC1.2	Housing Overlay RM (24.0)	38	Moderate	Only .53 acres of the 2-acre site is utilized with a commercial structure. The remaining 1.46 acres, which includes surface parking, could be redeveloped to accommodate the proposed residential units without impacting the existing

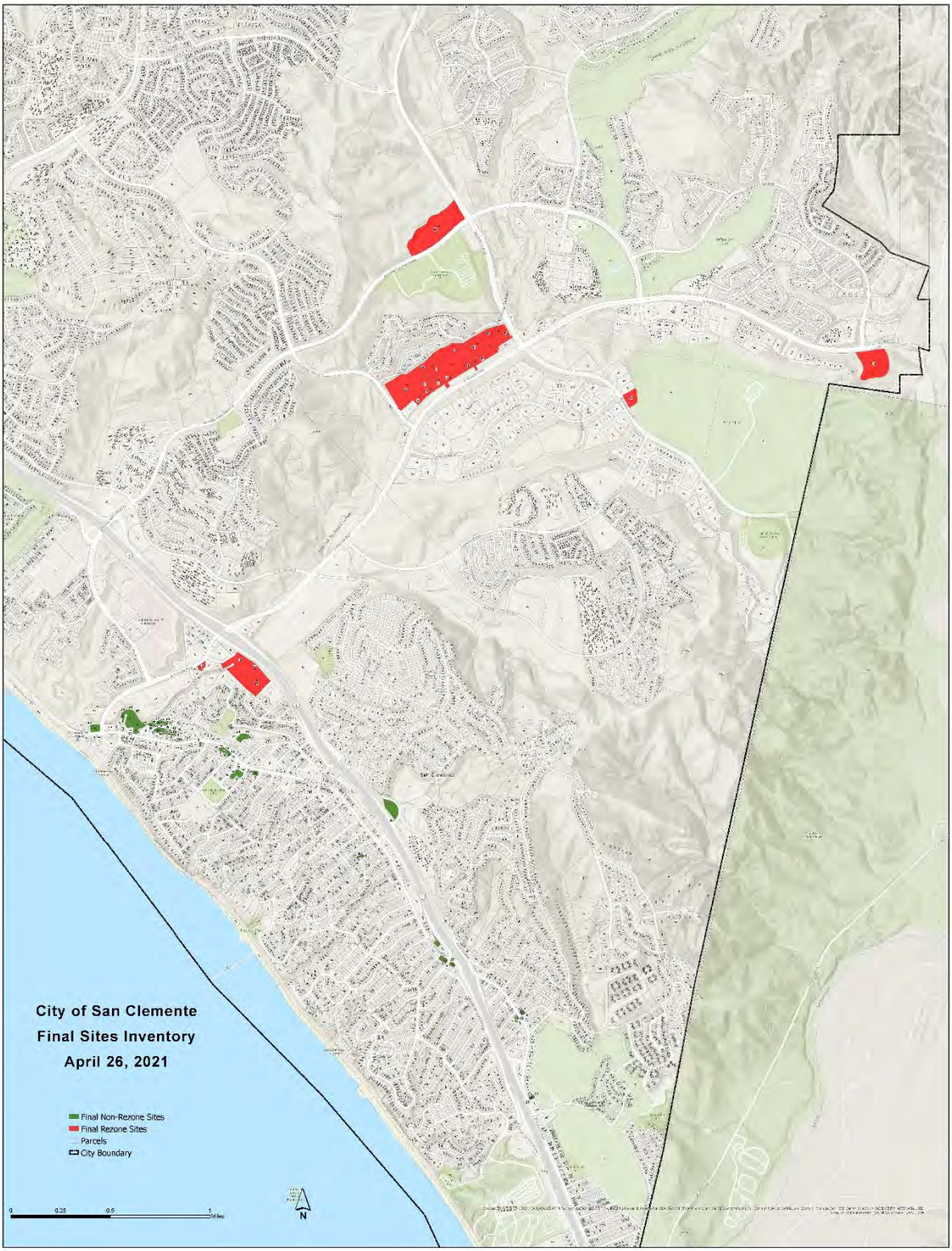
												commercial structure. (see Figure 4-1)
Q	692-351-09	101 Pico Plaza	Commercial building (1979)	0.17 (0.28)	MG Pico Associates	7.46	WPCSP (CC2)	CC2-PB	Housing Overlay RMH (30.0)	178	Lower	Only .17 acres of the 7.46-acre site is developed with a commercial building. The remaining 7.29 acres of the property, which consists of surface parking, could be redeveloped to accommodate the proposed number of residential uses without impacting the existing commercial uses. (see Figure 4-1)
R	692-351-05	85 Pico Plaza	Shopping center and surface parking (1979)	0.26 (0.19)	99 Cents Only Stores, LLC	3.03	WPCSP (CC2)	CC2-PB	Housing Overlay RMH (30.0)	73	Lower	Of the 3.03-acre site, 2.22 acres are developed with a commercial building. The remaining .8 acres of the property is surface parking which could be redeveloped to accommodate the proposed number of residential units by clustering the development on a portion of the surface parking area without impacting the existing commercial uses. Alternatively, this shopping center is an ageing commercial development that could accommodate

												additional residential through redevelopment of the entire parcel. (see Figure 4-1)
S	692-351-10	91 Pico Plaza	Surface parking (1979)	0.16 (0.18)	MG Pico Associates	0.37	WPCSP (CC2)	CC2-PB	Housing Overlay RMH (30.0)	9	Moderate	Only .06 acres of the .37-acre site is developed with a commercial building. The remaining .3 acres of the property, which consists of surface parking, could be redeveloped to accommodate the proposed number of residential uses without impacting the existing commercial uses. (see Figure 4-1)
T	057-020-68	416 E Ave Pico	Commercial building and surface parking (1979)	8.04 (0.30)	Gregori and Gregori, LLC	0.48	WPCSP (CC2)	CC2-PB	Housing Overlay RMH (30.0)	12	Moderate	
U****	701-043-09	Pico	Vacant	0.00 (0.00)	Talega Associates	8.46	TSP (C & OS)	OS2	TSP RH (40.0)	271	Lower	The vacant property could accommodate the number of residential units proposed after rezoning.
V**	675-072-19	654 Camino de los Mares	Closed hospital and surface parking (1982)	0.91*** (0.27)***	Saddleback Memorial Medical Care	6.63	RMF1	RMF	Housing Overlay RH (45.0)	239	Lower/ Above Moderate	The existing structures on site have been vacant for seven years. The former hospital building is not suitable for adaptive reuse due to its deteriorating condition. It is anticipated that a redevelopment of

												the site with residential would occur utilizing all 6.63 acres.
	Total					85.17				1,481		

Note: Potential units are 80% of maximum allowable units.
* Potential units calculated using only 1.6 acres (surface parking only) due to the existing commercial use.
** Includes 7,500 sf for commercial/medical office.
***Data source: https://maps.scag.ca.gov/helpr/, accessed September 2021
****Also known as 701-043-04 (Santa Margarita Water District), 701-043-08 (Foothill Eastern Transportation), and 701-043-07 (Talega Associates).

Figure 4-1: Residential Sites and Rezone Sites Inventory



4.1.4 Adequacy of Sites to Meet RHNA

4.1.4.1 Summary of RHNA Strategy

For the 6th Housing Element, the City was allocated 982 units. The inventory of sites currently zoned for residential and mixed use development can accommodate up to 320 units. Specifically, up to 103 affordable units can be accommodated on high-density residential properties that allow up to 36 units per acre. Another 17 affordable units can be accommodated on NC properties within the proposed Housing Overlay at an effective density of 32.4 units per acre. Several sites identified in the sites inventory are located in zones that allow high density residential (30+ units per acre). However, the sites are not large enough accommodate affordable housing. Along with anticipated ADUs (120 units), the existing sites inventory still has a shortfall of 244 lower income units, 21 moderate income units, and 277 above moderate income units.

To augment the sites inventory, the City identified a list of potential candidate sites for rezoning to make up the shortfall. Combined, the overall rezone strategy provides a capacity for at least 1,481 units; at least 636 units are on sites suitable for the development of lower income housing. Specifically, 341 lower income units can be accommodated on properties rezoned to RMH (30 du/ac), 271 lower income units can be accommodated on properties zoned to RH in the Talega Specific Plan (TSP) (40 du/ac) and 24 lower income units can be accommodated at Site V zoned to RH (AH) (45 du/ac).

The combination of the anticipated ADUs, vacant and underutilized sites inventory, and rezone sites inventory would adequately accommodate with City's RHNA. Table 4-7 summarizes the RHNA strategy.

Table 4-7: Summary of RHNA Strategy

Unit Capacity	Lower Income Units	Moderate Income Units	Above Moderate Income Units	Total Units
RHNA	446	188	348	982
Anticipated ADUs	*82*	*36*	*2*	*120*
Vacant and Underutilized Sites	*120*	*131*	*69*	*320*
RM (24 du/ac)	--	--	69	69
NC2/NC3 (32.4 du/ac)	17	47	--	64
RH/MU1/MU2/LU(MU) (36 du/ac)	103	74	--	177
MU3 (48.6 du/ac)	--	10	--	10
Candidate Sites for Rezone	*645*	*234*	*602*	*1,481*
RSCSP RM (15 du/ac)	--	--	309	309
RM (AH) (24 du/ac)	--	222	78	300
RMH (AH) (30 du/ac)	341	21	--	362
TSP RH (40 du/ac)	271	--	--	271
RH (AH) (45 du/ac)	24	--	215	239
Total	838	410	673	1,921
Surplus	392	222	325	939
	+88%	+118%	+93%	+96%

Table 4-8 shows the distribution of units used to meet the RHNA by income category and site vacancy. This estimate combines the vacant and underutilized sites inventory, and the candidate rezone sites inventory. Over 77 percent of the City's lower income RHNA is fulfilled on vacant sites.

Table 4-8: Distribution of RHNA Units by Site Vacancy

	Units on Vacant Sites	Percent of RHNA	RHNA
Lower Income	345	77.4%	446
Moderate Income	47	25.0%	188
Above Moderate Income	69	19.8%	348
Total	461	46.9%	982

4.1.5 Availability of Infrastructure and Services

The City is an urbanized community, and the sites inventory includes only properties that are along the City's transportation corridors and infill sites where existing infrastructure and facilities are available. The City's Water and Sewer Utilities Division has confirmed its ability to provide potable water and sanitary sewer service to accommodate the City's remaining RHNA during this planning period. Due to water conservation and the expansion of the City's recycled water system, there is additional capacity in the City's water and sewer systems to accommodate the residential growth. Furthermore, the City's Urban Water Management Plan (UWMP) prioritizes water for lower income housing to address Government Code Section 65589.7.

4.1.6 Environmental Constraints

Environmental conditions can also pose constraints on development. The City prepared an environmental analysis (Environmental Impact Report or EIR) with the Housing Element Update which evaluated and accounted for optional impacts. The following discussion examines the environmental constraints in the City. Please see the EIR for further and detailed discussion as to how environmental constraints are mitigated. Environmental constraints were considered when determining the potential sites for rezoning listed in Table 4-5.

Land in San Clemente is vulnerable to earthquakes, flooding, sea level rise, tsunamis, and wildfires, and contains sensitive habitat areas. Geologic and seismic hazards are environmental constraints in some areas of the city. Development in these areas could potentially require additional requirements for retrofits or building construction to address geologic and seismic hazards. Mitigation measures would apply to future development and reduce potential impacts to less than significant.

Sea level rise, flooding, and tsunamis constrain development along vulnerable bluffs and low-lying areas near the coast. Flooding can erode soil, and compound other hazards, such as landslides. The watercourses adjacent to potential rezone Sites C through P, and Site Q are entirely underground and channelized; there is no impact.

CalFire identifies and maps areas of fire risk in California based on physical conditions that create a likelihood that an area will burn over a 30- to 50-year period including fuel, slope, and weather. Sites that fall within the Very High Fire Hazard Severity Zone were not excluded from the available sites inventory, but these areas are noted as this may contribute to additional costs for design considerations, structure hardening, or buffers. Climate change is likely to increase the fire and flooding impacts on property and residents in the long term. All of these constraints have been accounted for potential rezone sites in the land inventory.

Environmentally sensitive habitat areas (ESHA) are mapped throughout the City's coastal zone. The City's coastal Land Use Plan calls for additional protections for these areas including buffers between ESHA and development. Sensitive habitat and species are also mapped for non-coastal areas throughout the City. Potential rezone Site A is mapped as containing grassland vegetation, and Site U is mapped as containing Coastal Sage scrub with some grassland. Mitigation measures would apply to future development and reduce potential impacts to less than significant. The EIR evaluated and accounted for potential impacts and no conditions exist that preclude development.

4.2 Financial Resources to Support and Provide Affordable Housing

The provision of affordable housing to low and moderate income households, especially those with extremely low incomes, requires significant financial investment in the form of subsidies. Below is a summary of funding sources available to the City for new construction, acquisition and/or rehabilitation, and preservation of housing, as well as providing housing assistance and supportive services.

4.2.1 Inclusionary Housing In-Lieu Fund

San Clemente adopted an Inclusionary Housing Program (IHP) in 1980 to expand affordable housing options in San Clemente. The IHP requires developers of six or more units to provide a portion of their development to be designated and made available as affordable rental housing on-site, off-site, or through the payment of an in-lieu fee. The City collects an in-lieu fee for projects that choose not to build affordable housing units. The fee is based on the gap between the market rate units and the amount needed to subsidize units at 50 percent of median household income. In the past, the City has used in-lieu funds to assist non-profit developers (such as Mary Erickson Community Housing and Jamboree Housing) by providing grants to purchase existing housing or to finance the construction of new affordable housing. As of September 2020, approximately $1.8 million was available in the in-lieu fund.

4.2.2 Community Development Block Grant (CDBG) funds

The City of San Clemente is an entitlement jurisdiction, eligible to receive CDBG grants directly from the U.S. Department of Housing and Urban Development (HUD) on an annual basis. Activities proposed by the City must meet the objectives and eligibility criteria of CDBG legislation. The primary CDBG objective is the development of viable urban communities, including decent housing and a suitable living environment, and expanding economic opportunity, principally for persons of lower income (<80 percent AMI). Each activity must meet one of the following three broad national objectives:

- Benefit lower income families
- Aid in the prevention or elimination of slums or blight
- Meet other community development needs having a particular urgency due to existing conditions that pose a serious and immediate threat to the health or welfare of the community

Through the CDBG program, HUD provides funds to local governments for a range of housing and community development activities. The City of San Clemente uses federally entitled grant funds to support a wide range of services and programs that benefit the community's lower and moderate-income households. CDBG funds may be used in the acquisition of land for housing and in the funding of rehabilitation and preservation programs. The City of San Clemente receives approximately $300,000 annually in CDBG funds.

4.2.3 SB2 Grants

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the State's housing shortage and high housing costs. Specifically, it included the Building Homes and Jobs Act (SB 2, 2017), which establishes a $75 recording fee on real estate documents to increase the supply of affordable homes in California. Because the number of real estate transactions recorded in each county will vary from year to year, the revenues collected will fluctuate.

The first year of SB 2 funds are available as planning grants to local jurisdictions. The City of San Clemente received $310,000 for planning efforts to facilitate housing production. For the second year and onward, 70 percent of the funding will be allocated to local governments for affordable housing purposes. A large portion of year two allocations will be distributed using the same formula used to allocate federal Community Development Block Grants (CDBG). The City is eligible to receive approximately $189,000 under this Permanent Local Housing Allocation (PLHA) component of SB 2.

4.2.4 Public Financing

The HCD and HUD offer construction, rehabilitation, and permanent financing as low as three percent to qualified applicants such as housing authorities or private not-for-profit developers. Application for these funds is highly competitive and a successful application depends on the availability of other funding sources for leverage and the extent and urgency of local needs.

4.3 Partnership Resources

The City collaborates with various nonprofit housing developers to provide affordable housing for lower and moderate income households and households with special needs through new construction, acquisition/rehabilitation, and preservation of at-risk affordable housing. The following agencies have the capacity and experience to develop and manage affordable housing in San Clemente:

- **Mary Erickson Community Housing (MECH):** The mission of Mary Erickson Community Housing is to promote the well-being of working families by preserving and increasing the supply of affordable housing. In 1994, MECH acquired its first apartment project in central San Clemente—a blighted eight-unit property. MECH currently operates four affordable apartment communities in San Clemente.
- **Jamboree Housing:** Jamboree was founded in 1990 to expand housing opportunities for low-income families and seniors. Jamboree developed the 186-unit Mendocino at Talega in San Clemente in 2003.
- **National CORE:** National CORE was founded over 20 years ago and manages affordable housing properties in California, Texas, Arkansas, and Florida. The organization also created the Hope Through Housing Foundation in order to provide high-quality supportive services for their over 27,000 residents.
- **Meta Housing:** Meta Housing was founded in 1993 and has since developed over 6,000 multi-family residential units in Southern California. In 2014, Meta completed their 50th affordable housing community—San Clemente's Cotton's Point Senior Apartments.

5 Housing Action Plan

5.1 Goal: Adequate opportunities for new housing for all economic levels and those with special needs.

5.1.1 Strategies

- Ensure that the General Plan and Zoning Ordinance designate sufficient land at appropriate densities and in appropriate locations to accommodate the City's share of regional housing needs.
- Facilitate the production of high-quality affordable housing for lower income and special needs households through inclusionary housing, incentives, direct financial assistance, and administrative support.

5.1.2 Programs

Program 1: Provide Adequate Sites and Monitoring for No Net Loss

The City is committed to ensuring that adequate sites at appropriate densities remain available during the planning period, as required by law. The City will maintain an inventory of vacant and underutilized sites to accommodate the City's Regional Housing Needs Assessment (RHNA) of 982 units (282 very low income, 164 low income, 188 moderate income, and 348 above moderate income). Between anticipated ADUs (120 units) and the vacant/underutilized sites currently zoned for residential or mixed use development (320 units), the City can provide up to 440 units, with a shortfall of 542 units (244 lower income units, 21 moderate income units, and 277 above moderate income units).

To fully accommodate the City's RHNA and to foster additional residential growth, the City will apply a housing overlay (H) to up to 26.4 acres (6 parcels) to accommodate the lower income RHNA shortfall and apply the housing overlay (H) to up to 45.2 acres (16 parcels) to accommodate the moderate and above moderate income RHNA shortfall. Rezoning of candidate sites as summarized in Table 5-1 below and detailed in Table 4-6 will be completed within three years of the statutory deadline of the Housing Element. The rezoned sites for lower income RHNA shortfall will meet the requirements of Government Code 65583.2, including, but not limited to a minimum density of 20 units per acre, minimum site size to permit at least 16 units on site, and allow ownership and rental housing by right in which at least 20 percent of the units are affordable to lower income households.

Table 5-1: Candidate Sites for Rezoning to Meet RHNA

Current Zone	Proposed Zone	Acreage	Parcels
RSCSP (BP)	RSCSP (H)	2.2	1
FRSP (NC)	FRSP (H)	1.6	1
RSCSP (MU)	RSCSP (H)	41.4	14
WPCSP (CC2)	WPCSP (H)	11.3	4
TSP (OS/C)	TSP (H)	8.5	1
RMF1	RMF1 (H)	6.6	1
Total		71.6	22

To comply with SB 166 (No Net Loss), the City will monitor the consumption of residential acreage to ensure an adequate inventory is available to meet the City's RHNA obligations throughout the Housing Element planning period. The City will implement an 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.

The City will maintain an inventory of available sites for residential development and provide the inventory on the City's website, including in form of a GIS web app showing a map of the sites inventory.

Objectives:

- Within three years of the 6th Housing Element statutory deadline, rezone candidate sites with a housing overlay (H) of up to 71.6 acres but at least necessary to accommodate the City's RHNA shortfall of 244 lower income units, 21 moderate income units, and 277 above moderate income units. The rezoning process will include community outreach, including community outreach for additional potential rezone sites if the candidate sites become unavailable.
- Facilitate development on the rezoned sites by establishing appropriate objective development standards (including height limit, lot coverage, and parking) that would allow development projects to achieve the allowable densities. Specifically, consistent with City practice, the City will allow development potential to be calculated for the entire site based on gross density, while allowing the residential units/mixed use components to be clustered on portions of the site.
- Monitor and update the sites inventory continuously to assess its adequacy for meeting the RHNA, particularly for sites capable of facilitating the development of lower income housing.
- Make the inventory of vacant and underutilized sites available to interested developers. The sites inventory will be posted on the City's website, the City's housing sites GIS app, and updated annually.
- Should properties identified in the residential sites inventory become unavailable during the planning period for housing for lower income households, resulting in a shortfall in sites for meeting the RHNA, within six months, the City will identify additional sites of appropriate size and density and rezone, if and as necessary per Government Code § 65863.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget, SB 2 grant funding

Program 2A: By-Right Approval for Projects with 20 Percent Affordable Units

Pursuant to AB 1397 passed in 2017, the City will amend the Zoning Ordinance and apply a Housing Overlay (H) to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower income (very low and low) households, on the following types of sites for meeting the City's RHNA:

- Sites being used to meet the 6th cycle RHNA that represent a "reuse" of sites previously identified in the 4th and 5th cycles Housing Element. The "reuse" sites are specifically identified in the inventory (Table 4-4).
- Candidate sites that are rezoned within three years from the statutory deadline of the 6th cycleHousing Element (Table 4-6).

Objectives:

- For reuse sites, amend the Zoning Ordinance by the end of 2022 and apply a housing overlay to establish by-right approval process as required by AB 1397, which allows the City to require the architecture/design of all projects to meet objective design standards.
- Concurrently with the establishment of a housing overlay on candidate sites and within three years of the 6th Housing Element statutory deadline, establish a by-right approval process allowing the City to require the architecture/design of all projects to meet objective design standards.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget, SB 2 grant funding

Program 2B: SB 35 Streamlining for Projects with Affordable Units

Pursuant to SB 35 passed in 2017, to facilitate residential development and to comply with State law, the City will 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, as provided for by applicable sections of the Government Code.

Objectives:

- Within three years of Housing Element adoption, and no later than October 2024, develop procedures to address the streamlining requirements of SB 35

Responsible Agency: San Clemente Community Development Department

Funding Sources: Grant funding to be determined

Program 3: Lot Consolidation

The City does not rely on small lots for its lower income RHNA units. Nevertheless, the residential sites inventory includes some small parcels that are clustered and offer excellent opportunity for consolidation in order to facilitate high-quality and well-designed developments. In January 2021, the City adopted the Lot Consolidation Ordinance to incentivize consolidating lots by offering by-right and optional incentives to developers who propose housing built at maximum density. Incentives offered by the Ordinance include:

By-Right Incentives:

- Increased allowable density by 25 percent;
- Increased lot coverage; and
- Reduced setbacks

One of the following optional incentives:

- Reduced development fees;
- Partial administrative staff review;
- Increased building height;
- Decreased parking ratio requirements;
- Modifications to commercial FAR in Mixed Use zones; or
- Greater increase in density.

When developing on sites listed in the Residential Sites Inventory, a developer is not required to pursue the Lot Consolidation Ordinance and the incentives provided and instead can develop each parcel

individually. A developer also has the right to consolidate lots and choose not to take advantage of incentives provided in the ordinance. If a developer wants to benefit from the incentives, a project must propose to develop at the maximum allowed density provided by the Lot Consolidation Ordinance. A developer can also propose a "combined density bonus", which is a combination of the Lot Consolidation Ordinance and State Density Bonus, and allows an even greater maximum density while benefiting from one of the additional optional incentives listed in the ordinance.

A "combined density bonus" offers developers a greater number of units and development with additional concessions/incentives, while generating more, or the same amount of affordable housing units for the City than if the developer pursues the affordable State Density Bonus or Lot Consolidation Ordinance separately. To ensure the City receives an adequate number of affordable units, when pursuing a "combined density bonus", the Lot Consolidation Ordinance establishes that the number of affordable units required by the State Density Bonus must be equal to or greater than the number of affordable units required for Lot Consolidation.

Objectives:

- Facilitate lot consolidation via the following:
  - By the end of 2022, develop informational materials on the City's new Lot Consolidation program and promote available incentives to developers, especially to property owners and developers of sites in the Residential Sites Inventory and Candidate Rezone Sites.
  - On an ongoing basis, provide technical assistance regarding the lot consolidation process to interested parties.
- By 2022, make the inventory of vacant and underutilized sites available to interested developers. The sites inventory will be posted on the City's website, the City's housing sites GIS app, and updated annually and assist in identifying sites with lot consolidation potential. (Table 4-4 identifies vacant and underutilized parcels in the City and Table 4-6 identifies candidate sites for rezoning.)
  - Process lot consolidation applications concurrently with other applications for development.
  - By 2025, re-evaluate the trend of lot consolidation and make modifications as necessary to promote housing and mixed use development on small sites, if the City determines lot consolidation is relevant and appropriate.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

Program 4: Density Bonus Ordinance

In accordance with Chapter 4.3 Section 65915 et. seq. of the California Government Code, the City of San Clemente adopted a Density Bonus Ordinance and periodically amends this ordinance (most recently in 2018) to comply with updates to State requirements.

Objectives:

- Update Density Bonus Ordinance by the end of 2022 to reflect recent changes to the State density bonus law.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

Program 5: Affordable Housing Overlay

In 2006, the San Clemente City Council adopted the Affordable Housing Overlay Zone along El Camino Real. The Overlay applies to nonresidential sites and housing-only projects must be mixed income housing with 51 percent of the units affordable to very low income households (up to 50 percent AMI). In 2011, the City adopted a number of amendments to the Affordable Housing Overlay Zone. The minimum density in the Overlay was increased to 20 units per acre. The City also removed the Conditional Use Permit (CUP) requirement in the Overlay. In 2018, the City changed the Affordable Housing Overlay zoning standards to allow stand-alone residential units and affordable housing on any mixed-use zoned lots in the Housing Element sites inventory. The City will continue to review various aspects of the Affordable Housing Overlay Zone in order to improve its effectiveness at producing affordable housing units and make amendments as necessary.

Objectives:

- Continue to implement the requirements of the Affordable Housing Overlay Zone.
- Concurrently with the housing overlay in Program 1, and by-right approvals in Program 2A, modify the Affordable Housing Overlay Zone to improve the effectiveness of the Overlay Zone and make amendments as necessary. Specifically, evaluate the effectiveness of one Housing Overlay (H) with objective design standards, minimum levels of affordable housing units, and by-right approval if 20 percent of the units are set aside for lower income (very low and low) households (see Program 2A). As part of this review, evaluate the development standards for height limits, lot coverage, and parking requirements to ensure that development projects have the ability to achieve the allowable densities.
- Prioritize inclusionary in-lieu fees for lower income affordable housing projects proposed in the Affordable Housing Overlay / Housing Overlay (see also Program 7).

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

Program 6: Inclusionary Housing Program

San Clemente adopted an Inclusionary Housing Program (IHP) in 1980 to expand affordable housing options in San Clemente. San Clemente's IHP requires developers of six or more units to set aside four percent of the total number of units for households earning 50 percent or less of the median income. This affordable requirement can be provided either on-site, off-site, or through the payment of an in-lieu fee or provision of land. The in-lieu fee option was intended primarily for small to midsize in-fill developments or subdivisions where insufficient land exists to provide both for-sale and rental units.

Objectives:

- Continue implementation of the Inclusionary Housing Program.
- By 2025, the City will retain a consultant to evaluate the effectiveness of Inclusionary Housing Program in facilitating the development of all income levels, and conduct a feasibility study to evaluate increasing the inclusionary housing requirement from 4% very low to 15% (5% very low, 5% low, and 5% moderate). Updates to the Inclusionary Housing Program will reflect the new requirement with a corresponding updated in-lieu fee (paid if affordable units are not provided on-site) to reflect current land and construction costs, and other related updates.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

Program 7: Affordable Housing Development

Local governments can support the production of affordable and workforce housing by contributing capital funds to local affordable housing developments. This financial assistance can come in a variety of ways, such as by deferring, waiving, or reimbursing permitting fees for affordable units, either in 100 percent affordable developments or in mixed-income inclusionary projects. While jurisdictions cannot legally waive impact fees, which are meant to mitigate impacts generated by the project, they may offer financial assistance to cover these costs. Alternately, cities can pay for the necessary infrastructure improvements to prepare a site for residential development, in lieu of collecting impact fees. Below-market rate loans for land acquisition and predevelopment can prove vital for affordable housing developers with limited capital. The State also offers a number of funding sources for acquisition and predevelopment costs.

Objectives:

- Proactively encourage and facilitate the development of affordable housing by non-profit organizations for lower income households, particularly those with special needs including large households, seniors, extremely low-income (ELI) households, and households with persons who have disabilities or developmental disabilities with the goal of creating 446 affordable units for lower income households between 2021 and 2029 (282 extremely low and very low income and 164 low income units, see Program 1). Specifically, the City will:
    - Provide letters of support to affordable housing developers' applications to local, State, and Federal agencies for funding, provided the proposed projects are consistent with the goals and policies of the City's General Plan.
    - Evaluate, every other year, the City's Zoning regulations for potential constraints to the development of housing for persons with special needs.
- Continue to provide density bonuses and other incentives to developers who provide affordable units. By the end of 2022, develop informational materials on the City's website regarding the City's Lot Consolidation incentives, density bonus, Affordable Housing Overlay, and Inclusionary Housing. Establish priority for assistance for workforce housing targeting those who work and/or live in San Clemente.
- Continue to implement the Affordable Housing Overlay Zone (new Housing Overlay) and Inclusionary Housing Program.
- Every other year, meet with non-profit developers and housing organizations to evaluate projects for acquisition and rehabilitation/new construction of new shelters and long-term affordable housing.
- Annually, evaluate available housing funding programs administered by the State HCD and if appropriate, pursue funding for affordable housing (new construction, acquisition/rehabilitation, infrastructure improvements, and other housing assistance).

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget; Inclusionary Housing In-Lieu Fee Funds

Program 8: Accessory Dwelling Units (ADUs)

In March 2019, the City adopted the ADU ordinance in accordance with the applicable State law at the time. The City was adhering to State ADU regulations to permit ADUs in the community since January 2020. In March 2021, the City's updated ADU Ordinance became effective.

Objectives:

- Develop a monitoring program to ensure City is on track to meet the ADU construction goals:
  - If by October 2025 the City is not on track in meeting its ADU goal of 120 units, review and revise policies and efforts to increase ADU construction as necessary.
- Facilitate ADU construction through:
  - Developing a one-stop shop to assist homeowners to prioritize issues in building ADUs by 2022.
  - At least semi-annually, promoting the use of pre-approved site/floor plans for ADU created by the Orange County Council of Governments (OCCOG), such as through the City's newsletter and other social media platforms.
  - Pursuing funding at the State level to assist lower income homeowners in developing ADUs.

Responsible Agency: San Clemente Community Development Department
Funding Sources: Departmental Budget

Program 9: Pursue Funding Sources and Programs

The City of San Clemente is an entitlement jurisdiction, eligible to receive CDBG grants directly from HUD on an annual basis. Through the CDBG program, HUD provides funds to local governments for a range of housing and community development activities. In the past, the City of San Clemente has used CDBG funds to support a wide range of services and programs that benefit the community's lower income households, including the acquisition of land and the funding of housing rehabilitation and preservation programs. In addition to the CDBG program, a number of other funding programs and sources are available to affordable housing developers, including funds administered by the State Department of Housing and Community Development (HCD).

Objectives:

- Continue to apply for and administer CDBG grants annually.
- Pursue funding from sources such as the Permanent Local Housing Allocation (PLHA), CalHome or CalHFA to assist in housing rehabilitation, homeownership, and ADU development.
- Provide letters of support to affordable housing developers' applications to local, State, and Federal agencies for funding, provided the proposed projects are consistent with the goals and policies of the City's General Plan.

Responsible Agency: San Clemente Community Development Department

Funding Sources: CDBG; Departmental Budget

Program 10: Acquisition and Conversion of Market-Rate Housing to Affordable Housing

Facilitate the acquisition and conversion of market-rate housing to affordable status by non-profit organizations, with priority on substandard properties in need of rehabilitation. Properties will be evaluated for acquisition with in-lieu fees.

Objectives:

- At least every other year, discuss with non-profit organizations or affordable housing developers the opportunity to collaborate in purchasing a site to be used as transitional housing and/or long-term permanent housing with the goal of increasing the affordable housing inventory by 446 lower income units by 2029.
- On an ongoing basis, work with Code Enforcement to evaluate substandard properties as opportunities for rehabilitation as affordable housing units. Develop a list of potential properties and update annually. Offer the list to nonprofit housing developers.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Inclusionary Housing In-Lieu Fee

5.2 Goal: Energy conservation in residential developments

5.2.1 Strategies

- Establish green building incentive policies in the city to take advantage of new building techniques and construction methods.
- Adopt new building codes and housing techniques to accommodate new construction methods.

5.2.2 Programs

Program 11: Sustainable Policies

The City is committed to promoting sustainable design policies, standards and codes that result in attractive, energy efficient neighborhoods. In 2010, the City adopted a Sustainability Action Plan, which includes a series of sustainable Urban Design targets and actions. A number of energy efficiency programs are also available to residents of San Clemente. Residents and business owners are eligible to finance energy efficient property improvement projects through the Property Assessed Clean Energy (PACE) financing program. Three PACE programs are currently available to San Clemente residents: CaliforniaFIRST, Figtree Financing, and HERO financing.

Objectives:

- Continue to implement the Sustainability Action Plan.
- Continue to promote resident participation in available PACE programs by providing links to these programs on City website.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

5.3 Goal: Equal housing opportunity

5.3.1 Strategies

- Conduct outreach and education on fair housing rights and requirements.
- Enforce fair housing laws.
- Review and implement City policies through the lenses of equity.
- Encourage redevelopment and adaptive reuse of infill sites and properties in Affordable Housing Overlay Zone, such as conversion of residential motels to apartments.
- Ensure that the City's planning and development regulations accommodate special needs housing, such as homeless and transitional shelters, and related supportive services.
- Provide housing resources for prevention of homelessness and alternative housing for the homeless and disabled.
- Increase physical access through universal design and programmatic access to emergency, transitional shelters and regulated affordable housing, ensuring persons with disabilities are included in the range of services that supportive housing provides.

5.3.2 Programs

Program 12: Affirmatively Furthering Fair Housing

Appendix C provides a detailed assessment of the City's fair housing status.

Objectives:

Table 5-2 below summarizes the City's actions for addressing fair housing issues and concerns.

Table 5-2: Fair Housing Issues and Actions

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions	Priority Level
Racial Segregation	• Patterns of racial and ethnic concentration are present in low resource areas on the western side of the City • Lack of investments in specific neighborhoods • Location and type of affordable housing	• Annually promote equal access to information for all residents, with the goal to increase distribution of information by 20%. Specifically, by the end of 2022 outreach methods will expand beyond traditional media (newspaper or City website) to include other social median platforms such as Facebook, Twitter, and Instagram. • Focus outreach efforts in the area along the western side of Interstate 5 where racial/ethnic minorities and LMI households are concentrated. Continue to implement CDBG-funded infrastructure and facility improvements, including but not limited to sidewalk projects, which benefit	Moderate

Table 5-2: Fair Housing Issues and Actions

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions	Priority Level
		7,000 low- and moderate-income residents.[11] • Continue to work under contract with the Fair Housing Foundation (FHF) and/or other qualified fair housing service providers to provide fair housing services for all segments of the community, with the goal to serve at least 50 households each year[12]. Annually, evaluate and adjust the scope of services to ensure the City address any emerging trends in fair housing issues.	
Housing Mobility and Protection Against Displacement	• Unaffordable rents and sales prices in a range of sizes • Displacement of residents due to economic pressures	• By the end of 2022 and annually thereafter, provide outreach and education to landlords and tenants regarding the State's new source of income protection (SB 329 and SB 229) that recognizes public assistance such as Housing Choice Vouchers (HCV) and Veterans Assistance Supportive Housing (VASH) as legitimate source of income for rent payments. Specifically, provide fair housing responsibility to new ADU applicants. Through outreach, education, and OCHA's mobility counseling program, increase vouchers from Orange County Housing Authority by 10%. • Help non-profits acquire and convert market-rate housing to affordable housing (Program 10). • Work to preserve the City's affordable housing inventory (see Program 17).	High
Disproportionate Housing Needs	• Unaffordable rents and sales prices in a range of sizes • Shortage of subsidized housing units • Cost of repairs or rehabilitation • Dominance of single-family housing, which is typically more expensive than multi-family	• Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities by facilitating affordable housing throughout the community through: o By-Right Approval for Projects with 20 Percent Affordable Units (Program 2) o Lot Consolidation (Program 3) o Density Bonus (Program 4) o Affordable Housing Overlay (Program 5)	Moderate

[11] 22-23 Annual Action Plan. https://www.san-clemente.org/home/showpublisheddocument/68590/637849406590170000

[12] 22-23 Annual Action Plan. https://www.san-clemente.org/home/showpublisheddocument/68590/637849406590170000

Table 5-2: Fair Housing Issues and Actions

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions	Priority Level
		o Inclusionary Housing Program (Program 6) o Affordable Housing Development (Program 7) • Provide rehabilitation financing assistance, with a goal to at least two homeowners per year, through the Neighborhood Revitalization Program (Program 16) and advertise this program to the western and southern areas of the City with older housing units and overpaying households. • Increase public outreach to at least once a year and encourage residents to learn about available programs. • Connect lower-income residents with affordable homeownership and rental opportunities. Through outreach, education, and OCHA's mobility counseling program, increase vouchers from Orange County Housing Authority by 10%.	
Outreach and Education	• People obtain information through many media forms, not limited to: traditional newspaper noticing or other print forms. • Increasingly fewer people rely on the newspapers to receive information. Public notices and printed flyers are costly and ineffective means to reach the community at large.	• In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on source of household income (SB 329 and SB 229) at least once a year. • Through the City's fair housing service provider (FHF) increase materials distribution by 25% through the following: o Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful through fair housing service contract at least once a year. o Conduct multi-faceted fair housing outreach at least once a year to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature. o Provide general fair housing counseling and referral services to address tenant landlord issues, and investigate allegations of fair	High

Table 5-2: Fair Housing Issues and Actions

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions	Priority Level
		housing discrimination and take appropriate actions to reconcile cases or refer to appropriate authorities. o Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements. o Include testing/audits within the scope of work with fair housing provider.	

Responsible Agency: San Clemente Community Development Department

Funding Sources: CDBG and General Fund

Program 13: Social Services Grant Program

The City continues to set aside approximately 15 percent of its annual CDBG allocation for social services, including support for homeless services. Grant applications are announced in the local newspaper, at the City's Human Affairs Committee meetings, and are available on the City's website and through direct mail.

Objectives:

- Continue to provide grant applications for housing funds annually.
- Provide assistance to approximately 2,000 persons with special needs, including homeless, seniors and disabled persons, on an annual basis through grant awards.

Responsible Agency: San Clemente Community Development Department

Funding Sources: CDBG

Program 14: Zoning Ordinance Amendments

Pursuant to State law, the City is obligated to address, and where legally possible, remove governmental constraints affecting the maintenance, improvement, and development of housing. Removing constraints on housing development can help address housing needs in the City by expediting construction, and lowering development costs. The City will amend the Zoning Ordinance to address the following:

- Low Barrier Navigation Centers (AB 101): Establish provisions for Low Barrier Navigation Centers (LBNC) as development by right in areas zoned for nonresidential zones (including mixed use zones as required by law) permitting multi-family uses if it meets specified requirements. A "Low Barrier Navigation Center" is defined as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing."
- Emergency and Transitional Housing (AB 139): Establish parking requirements based on staffing level only.

- Supportive Housing (AB 2162): Establish provisions for supportive housing consistent with bill requirements. Projects of up to 50 units shall be permitted by-right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions, such as providing a specified amount of floor area for supportive services. The City may choose to allow projects larger than 120 units by right, as well. Prohibit minimum parking requirements for supportive housing within ½ mile of a public transit stop.
- Residential Care Facilities for Seven or More Persons: Ensure the permitting requirements and necessary findings for residential care facilities for seven or more persons are consistent with State law and fair housing requirements.
- Density Bonus (see Program 4)
- Accessory Dwelling Units (see Program 8)
- Multi-Family Uses in Multi-Family Zones: By end of 2023, process amendments to remove CUP requirement for 5+ units, if the project meets certain objective standards.

Objectives:

- Complete the above necessary amendments to the Zoning Ordinance by the end of 2022, except where otherwise noted.
- Monitor the Zoning Ordinance for any potential constraints to the development of housing, including the City's procedures for multi-family housing, and process amendments as necessary.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

Program 15: Monitoring of Emergency Shelter Overlay

In September 2017, the City amended the Emergency Shelter (ES) Overlay for the Rancho San Clemente Business Park area and launched its rideshare program in 2018. The City will continue to monitor the effectiveness of the Overlay as well as the rideshare program.

Objectives:

- Provide information to property owners and tenants in the Rancho San Clemente Business Park regarding the ES Overlay, including the purpose and intent behind the requirement to accommodate emergency shelter sites in the City.
- Evaluate the rideshare program annually and work with the vendor to improve the program or find alternatives to the program.
- In the event an emergency shelter is proposed, the City will work with the social service providers and shelter proponents to determine if the rideshare program serves as a feasible transportation option, or secure other alternatives while avoiding burden and costs on the applicants.
- Should an emergency shelter locate in the business park, the City would work with or partner with the emergency shelter operator to evaluate and implement options for providing transit service to and from the emergency shelter from existing transit routes.
- At least every two years and as emergency shelters are proposed, assess and update the City's unmet homeless shelter needs, upon review and analysis of reliable data and consideration of input from service providers and public input in a City Council meeting. The unmet homeless shelter needs will be updated when:

- Results of the Biannual Homeless Census (point-in-time) conducted by the Orange County Continuum of Care are available. Annually, the City will participant in the Homeless Census to obtain a specific homeless count for San Clemente, with specific counts for sheltered versus unsheltered homeless.
- Emergency shelters will be allowed without discretionary action until the unsheltered homeless need identified in this assessment is met and continue to be permitted through a discretionary review process.
- Significant changes in the housing market conditions occur that would impact the City's homeless shelter needs between the Homeless Censuses. The City will consult homeless service providers to establish the appropriate modifications to the established unmet homeless shelter needs.
- Significant changes to the City's homeless strategy occur, such as funding available for homeless housing programs that would reduce the unmet shelter needs.

- In 2024, evaluate additional areas in the City of San Clemente for inclusion in the Emergency Shelter Overlay (ESO), including evaluation of access to transportation and services. If appropriate, amend the ESO in 2026 to expand the boundaries to include additional areas. Evaluate amending ESOZ operating and development standards, including parking, so ensure development standards comply with State law and are not impediments to siting shelters. Update the ESOZ development standards, including but not limited to bed-limit and maximum separation requirement allowable under State law, to reflect and accommodate the most recent-point-in-time count.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

5.4 Goal: Maintenance of existing housing, especially affordable units, shelters, and properties owned by lower income residents

5.4.1 Strategies

- Continue a pro-active code enforcement program to identify housing in need of repair and make owners aware of resources for financial assistance.
- Preserve and enhance improvements to older, higher density neighborhoods by pursuing grant funding opportunities for housing rehabilitation and neighborhood improvements.
- Monitor assisted units at risk of conversion to market rate, and work with owners to preserve these affordable units to the greatest extent feasible.
- Preserve and enhance affordable mobile home parks.
- Maintain current policy regarding apartment conversions.

5.4.2 Programs

Program 16: Neighborhood Revitalization Program

The Neighborhood Revitalization Program is implemented by the City's Community Development Department and includes the Home Rehabilitation Program. The CDBG-funded Home Rehabilitation Program provides loans to qualified rental properties and owner-occupied properties. The program is advertised through the City's magazines, the local television channel, Facebook blasts, press releases, and direct mailings.

Objectives:

- Continue to implement the Neighborhood Revitalization Program and advertise at least annually the availability of this program to eligible residents and property owners by announcing in City magazines, placing flyers at all City buildings, posting on City website and social media. Code Enforcement also refers eligible property owners to the City's various programs for assistance.
- Provide 20 loans through the Home Rehabilitation Program during the Housing Element planning period.
- Annually, explore and pursue if appropriate, housing funding programs administered by the State HCD to expand the City's Neighborhood Revitalization Program.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget; CDBG

Program 17: Preserve At-Risk Housing

As of 2021, the City has an inventory of 486 affordable housing units with different terms of affordability covenants. One of City's affordable housing projects (133-135 West Canada) is at-risk of converting to market rate during the planning period. In 2020, the City met with MECH regarding these at-risk units and the City will continue to monitor these at-risk units. MECH has indicated the intent to maintain these as affordable housing. However, should a notice of intent to convert to market rate be filed, the City will work with MECH and potential purchasers to preserve the units and ensure that tenants are properly notified of their rights under California law.

Objectives:

- Monitor status of affordable units by maintaining contact with property owners and monitoring updates from websites such as the California Housing Preservation Commission.
- Ensure property owners adhere to new state noticing requirements prior to conversion – three-year, one-year, and six-month notices are required.
- Solicit interest and participation of nonprofit housing developers to acquire and preserve the at-risk units as affordable units.
- Provide letters of support to affordable housing developers' and non-profit applications to local, State, and Federal agencies for funding. See also Programs 7 and 9.
- Continue to work under contract with the Fair Housing Foundation (FHF) and/or other qualified fair housing service providers to provide fair housing services for all segments of the community, including tenant education and assistance. By the end of 2022 and annually thereafter, conduct outreach and education to landlords and tenants regarding the State's new source of income protection (SB 329 and SB 229) that recognizes public assistance such as Housing Choice Vouchers

(HCV) and Veterans Assistance Supportive Housing (VASH) as legitimate source of income for rent payments. See also Program 12.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

5.5 Summary of Quantified Objectives

The following table summarizes the quantifiable objectives from the various programs.

Table 5-3: Summary of Quantified Objectives (2021-2029)

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	141	141	164	188	348	982
ADU Construction	24	16	69	48	3	160
New Construction	30	30	50	75	200	385
Rehabilitation	5	5	10	0	0	20
Preservation of At-Risk Housing	12			0	0	12
Conversion of Market Rate	4					4

Appendix A: Public Outreach

The City implemented a public participation program for the development of the Housing Element. Below is an overview of the work program and schedule for public participation.

Public Outreach Schedule		
Outreach	Description	Date
Meeting flyer e-mailed to stakeholders and meeting notification blast to San Clemente news subscribers		October 8, 2020
Housing and Safety Element Webinar #1	Introductory presentation about the Housing and Safety Elements and respective policies.	October 22, 2020
Housing Survey – Housing Needs		December 11, 2020
Meeting flyer e-mailed to stakeholders and meeting notification blast to San Clemente news subscribers		January 12, 2021
Housing and Safety Element Webinar #2	An overview of the Housing and Safety Elements and description of the residential sites inventory.	January 26, 2021
Housing Survey – Rezone Sites	Survey and rezone site maps were published and promoted through the City's website, an e-blast, social media.	February 5, 2021
Housing Survey – Housing Types		March 26, 2021
Review of Draft Housing Element	Conducted Planning Commission and City Council meetings to receive input on the Draft Housing Element	May 2021
Housing and Safety Element Workshop #3	In-person workshop to discuss the draft Housing Element	July 1, 2021

The list of candidate sites for rezoning was revised multiple times as a result of community input throughout the development of the Draft Housing Element.

A.1 Community Meetings

A.1.1 Virtual Community Meeting – October 22, 2020

On October 22, 2020, the City conducted virtual community meetings where staff presented background information and initial finds on the Housing Element. Attendees were invited to participate in interactive polls and speak or share text comments.

<u>Comments Received (comments include those received regarding the Safety Element update)</u>

Participants were invited to participate in a poll during the October 22 virtual community meeting. The following key concepts were identified through the polling process and question and answer session:

- High housing cost and providing new rental housing are the biggest housing challenges the City faces;
- Seniors and young adults have the highest need for housing and housing-related services;
- Most participants thought the City should prioritize affordable housing and housing for homelessness over the next 8 years;
- Attendees felt that earthquake hazards and emergency services were the most important Safety Element topics to San Clemente residents;
- Attendees felt that wildfire and drought were the highest climate change-related issues residents are concerned about;
- There was concern about what the City will do differently this Housing Element cycle to meet the City's RHNA, specifically for lower income housing;
- Attendees expressed interest in additional outreach, a Housing Element working group, and public review.

Attendees at the meeting included the Kennedy Commission, Fair Housing Foundation and members from the San Clemente Affordable Housing Coalition.

A.1.2 Virtual Community Meeting – January 26, 2021

On January 26, 2021, the City conducted an additional virtual community meeting. Staff presented basic information related to the Housing and Safety Elements and solicited input on community values, housing issues, and the sites identified to meet the RHNA. A Spanish translation of the presentation was provided. Attendees were invited to participate in interactive polls to participate in interactive polls and speak or share text comments.

Comments Received

Participants were invited to participate in a poll during the January 26 virtual community meeting. The following key concepts were identified through the polling process and question and answer session:

- Attendees thought the North El Camino Real area and the Rancho San Clemente Specific Plan area were the most appropriate areas for additional housing;
- A higher density for identified properties was desired;
- Attendee expressed concern about affordable housing being located in the vicinity of high resource areas and ensuring affordable housing is not segregated;
- An attendee expressed interest in mixed income housing (moderate and affordable units);
- There were concerns about the Housing Element addressing COVID-19 related impacts, including evictions;
- An attendee expressed concern about the lack of an emergency shelter in the area.

A.2 Stakeholder Outreach

A.2.1 Agencies Invited

The following agencies were on the City's mailing list to receive information about public meetings related to the Housing Element update. The following agencies are community-based organizations or housing developers, public or private non-profit (including churches or religious entities), that are engaged in meeting human, educational, environmental, or public safety needs.

- Building Industry Association (BIA)
- Mission Hospital – Southern Orange County Housing Alliance

- Michael Luna (Developer)
- Mark McGuire (Developer)
- Rob Williams (Developer)
- National Core (Affordable Housing)
- Meta Housing (Affordable Housing)
- Mary Erickson Community Housing (Affordable Housing)
- Jamboree Housing (Affordable Housing)
- San Clemente Collaborative (SCC)
- Mercy House
- Laura's House
- Friendship Shelter and Henderson House
- Fair Housing Foundation
- Brilliant Corners
- The Kennedy Commission
- Habitat for Humanity – Orange County
- Orange County Community Housing
- Orange County Housing Authority
- Regional Center of Orange County
- Fair Housing Foundation
- Camino Health Center
- Family Assistance Ministries
- Homeless Youth Center
- Families Forward
- South County Community Outreach
- Saddleback Memorial Medical
- Orange County Association of Realtors
- Associated Builders and Contractors Inc. – Southern California
- Whittaker Planning Services
- Mendocino Apartments/John Stewart Comp.
- National CORE
- AMCAL Multi-Housing, inc.
- Western Senior Housing
- Conner, Fletcher & Hedenkamp
- Illumination Foundation
- iHOPE Orange County
- Redwood Housing Services
- Innovative Housing Services
- Human Options
- CHEC Family Resource Center
- Age Well Inc. - City's Senior Center
- OC Human Relations Commission
- San Clemente Military Family Outreach
- San Clemente Chamber of Commerce
- San Clemente Downtown Business Assoc.
- SC Historical Society
- Unichem Industries Inc
- Boys and Girls Club of South Coast Area
- Western Youth Services
- Coast Property Management
- Del Mar Property Management
- Bertha Henry Realtors
- Terra Vest Inc
- Apartment Association of Orange County

A.2.2 Stakeholder Discussions

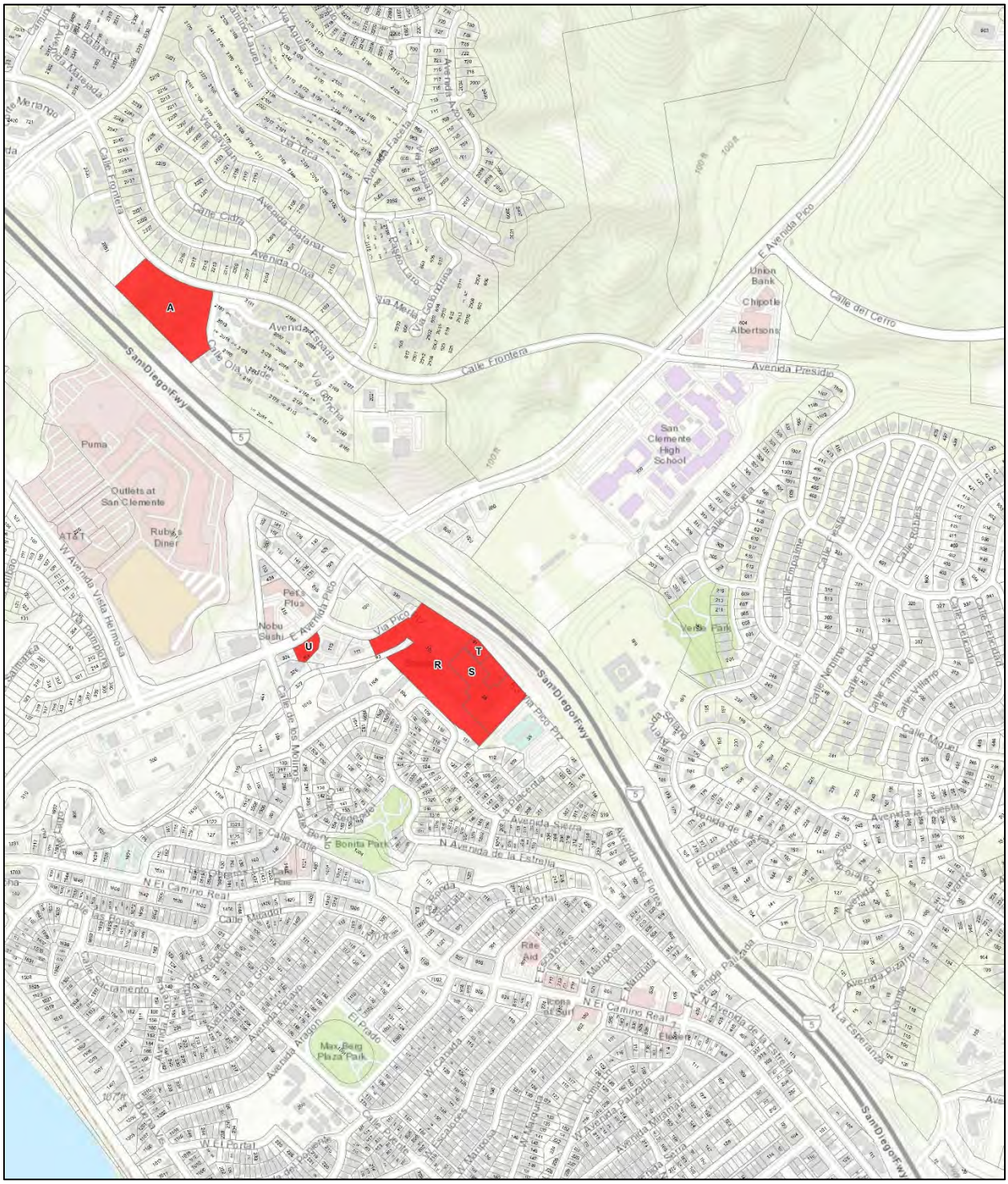
The City conducted a call with representatives from the Kennedy Commission, San Clemente Affordable Housing Coalition, and Welcoming Neighbors Home. Comments received from the call were addressed by: translating notices, webinars, and surveys to Spanish; holding an in-person workshop in neighborhood with highest Spanish speaking population; and educating participants in virtual workshops before asking for input. May 2021 was the City's public review period for the Draft Housing Element. The City held Planning Commission and City Council meetings, published a press release and public notices, and emailed the City's Housing Element email list.

The City also held separate stakeholder calls with the Kennedy Commission, San Clemente Affordable Housing Coalition, Emergency Shelter Coalition, and Public Law Center.

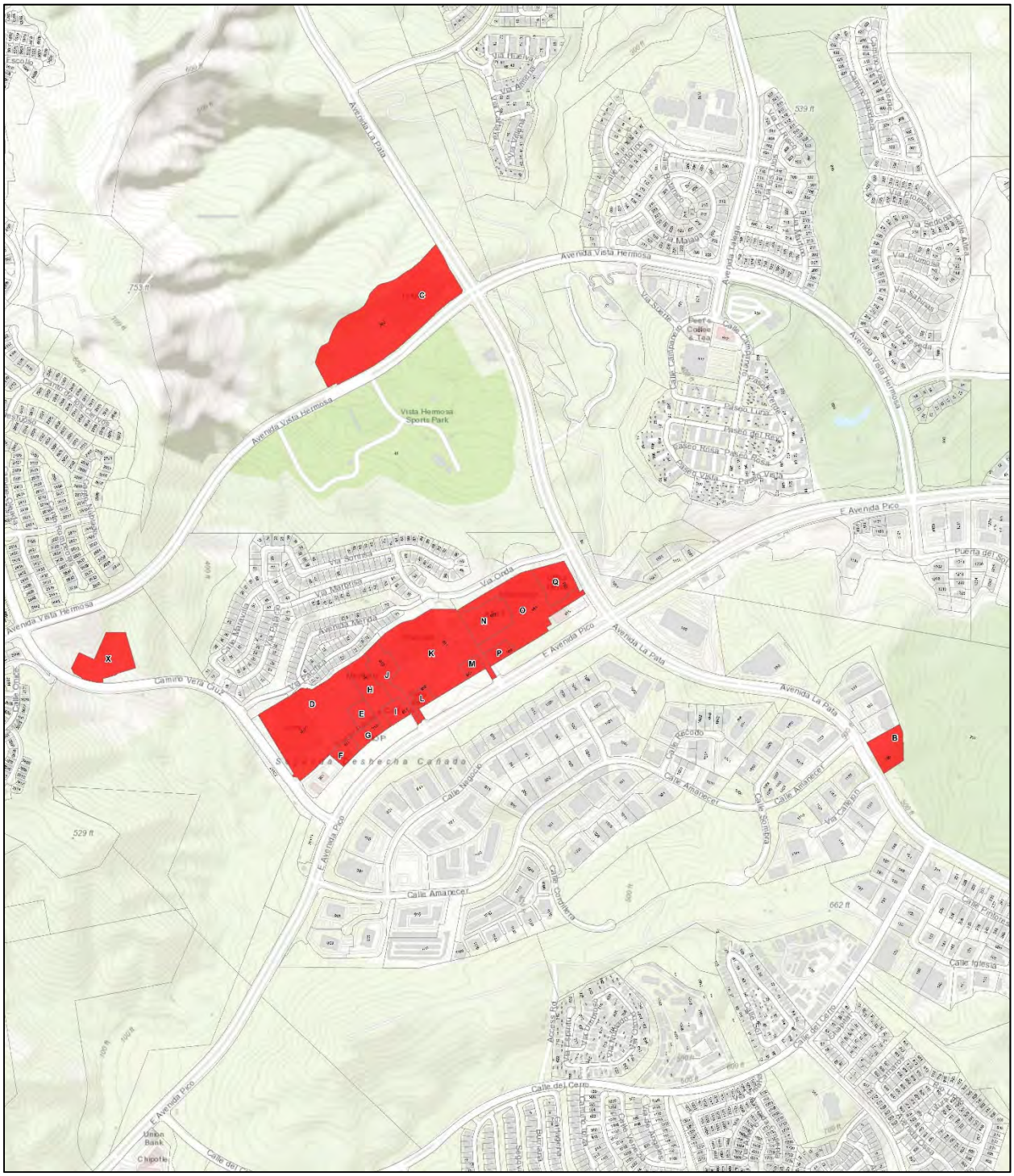
A.3 Community Surveys

The City published a residential rezone sites survey on February 25, 2021. The survey invited all San Clemente residents to provide their input on density of the proposed rezone sites listed in *Section 4: Housing Resource*. The survey was published three times on the City's social media pages. The City received 617 responses. The survey maps, questions, and responses are shown below.

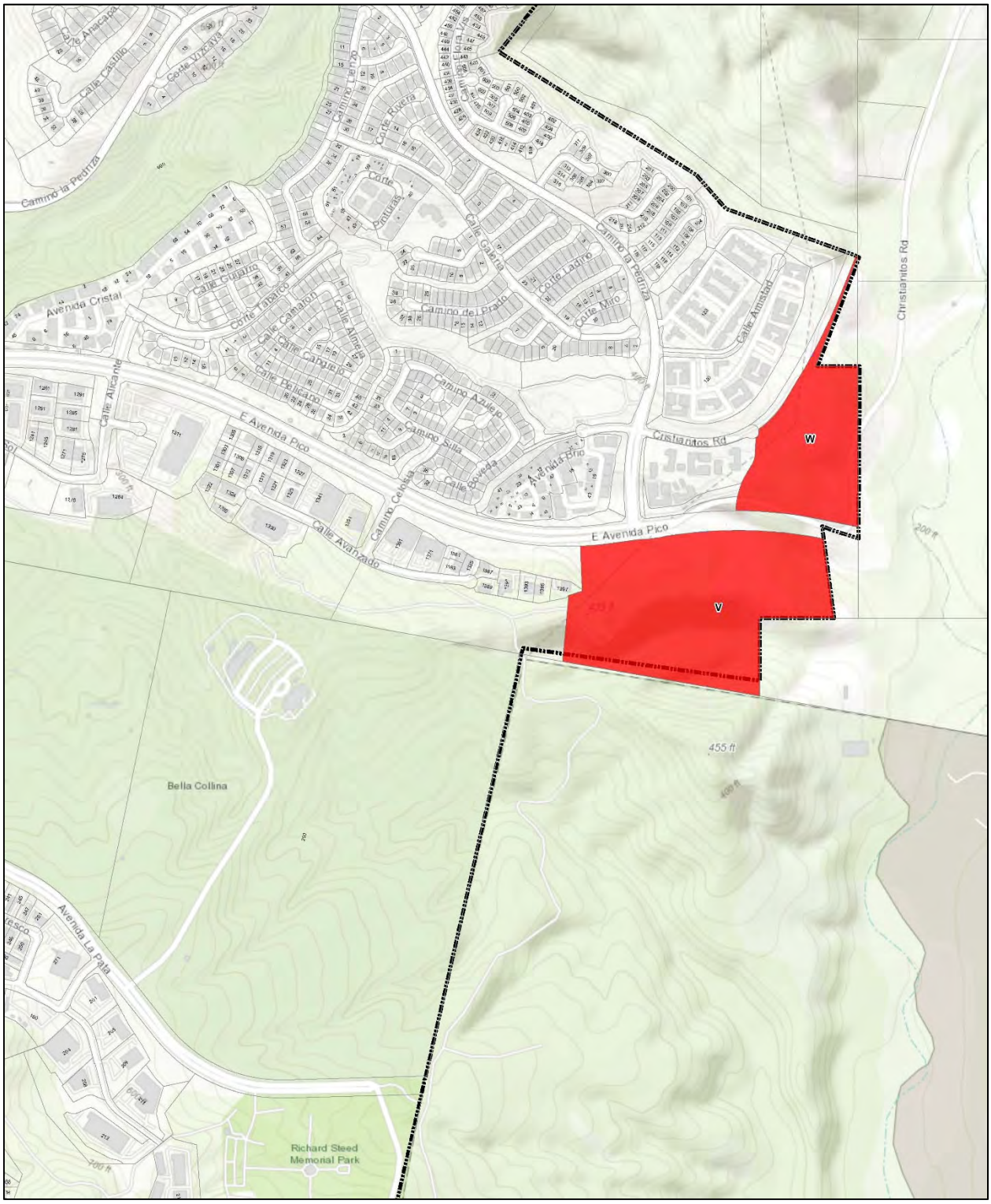
Rezone Sites (1)


A
R
S
T
U
San Diego Fwy
Calle Frontera
Avenida Pico
E Avenida Pico
Calle del Cerro
Avenida Presidio
Union Bank
Chipotle
Albertsons
San Clemente High School
Puma
Outlets at San Clemente
AT&T
Ruby's Diner
Pete's Plus
Nobu Sushi
Via Pico
Via Pico Pitr
Avenida Vista Hermosa
Calle de los Molinos
Calle Bery
Calle Valle
Bonita Park
N Avenida de la Estrella
N El Camino Real
Calle Matador
Calle Sacramento
Avenida Aragon
Max Berg Plaza Park
El Prado
W El Portal
E El Portal
Rite Aid
Avenida Palizada
N La Esperanza
Avenida Pizarro
Calle Escalera
Calle Estrella
Calle Neptuno
Calle Pueblo
Calle Familia
Calle Miguel
Calle Robles
Calle Delicada
Avenida la Cuesta
Avenida de la Estrella
Avenida Los Flores
Avenida Sierra
Avenida Cidra
Avenida Olina
Avenida Pajanar
Avenida Seguia
Calle Frontera
Calle Olla Verde
Via Lata
Via Mesia
Via Colombina
Avenida Facetas
Avenida Arboleda
Avenida Laurel
Calle Merlano
Calle Mariposa
Calle Mirlo
Calle Palmera
Via Rambla
Via Aguila
Via Cibola
Via Rocca
Via Gaviota
Via Lata
Via Lata Pitr
Via Mesia
Via Colombina
Via Pico
Via Pico Pitr
Via Rambla
Via Mariposa
Via Mirlo
Via Palmera
Via Aguila
Via Cibola
Via Rocca
Via Gaviota
Via Lata

Rezone Sites (2)


Avenida La Pata
Avenida Vista Hermosa
Vista Hermosa Sports Park
E Avenida Pico
Via Orda
Camino Vera Cruz
Calle Amanecer
Calle Negocio
Calle Recodo
Calle Sombrera
Calle del Cerro
Calle Iglesia
Puerta del Sol
Paseo Luna
Paseo del Rey
Paseo Vista
Via Sonrisa
Via Marbrisa
Avenida Mendoza
Via Pacifica
Calle Miguelita
Via Alegre
Via Serena
Via Rumosa
Via Salinas
Via Regalo
Calle Dolores
Calle Cantamar
Calle Contento
Calle Lagunita
Calle Pimienta
Calle Primavera
Calle Ambiente
Calle Sonrisa
Via Canino
Calle Ambiente
Calle Primavera
Calle Primavera
Calle Primavera

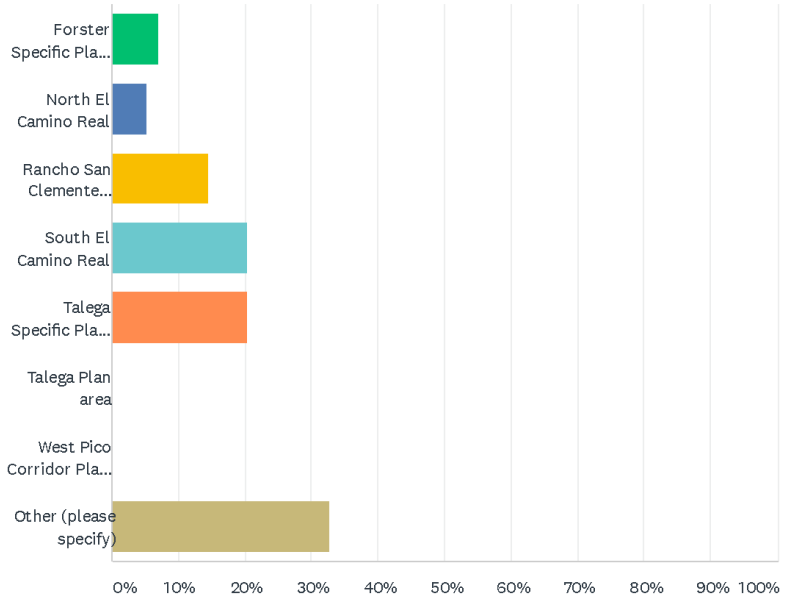
Rezone Sites (3)



City of San Clemente Housing Survey

Q1 What areas of the City would be most appropriate for additional housing?

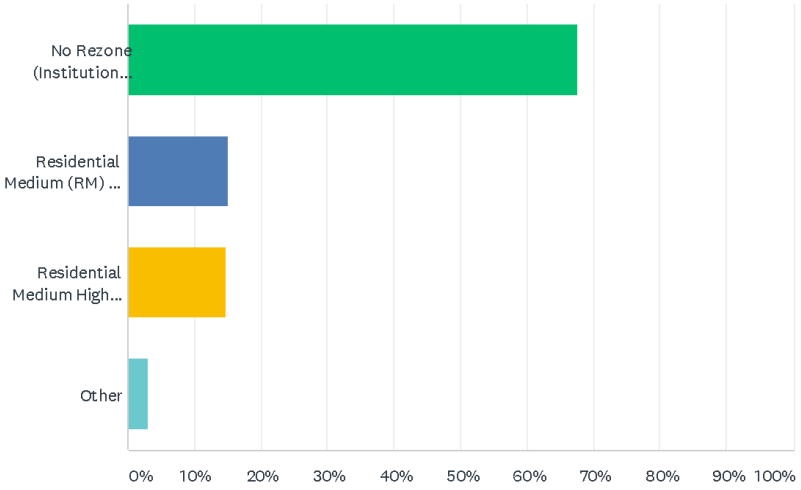
Answered: 590 Skipped: 27



ANSWER CHOICES	RESPONSES	
Forster Specific Plan area	6.95%	41
North El Camino Real	5.25%	31
Rancho San Clemente Specific Plan area	14.41%	85
South El Camino Real	20.34%	120
Talega Specific Plan area	20.34%	120
Talega Plan area	0.00%	0
West Pico Corridor Plan area	0.00%	0
Other (please specify)	32.71%	193
TOTAL		590

Q2 Site A: Calle Frontera (5.31 acres)

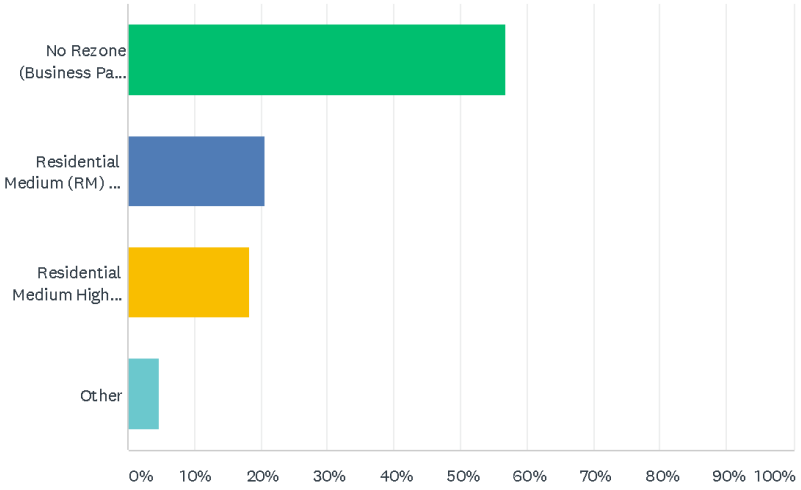
Answered: 446 Skipped: 171



ANSWER CHOICES	RESPONSES	
No Rezone (Institutional) (0 units)	67.49%	301
Residential Medium (RM) (24 units/acre)	15.02%	67
Residential Medium High (RMH) (30 units/acre)	14.57%	65
Other	2.91%	13
TOTAL		446

Q3 Site B: 190 Avenida La Pata (2.17 acres)

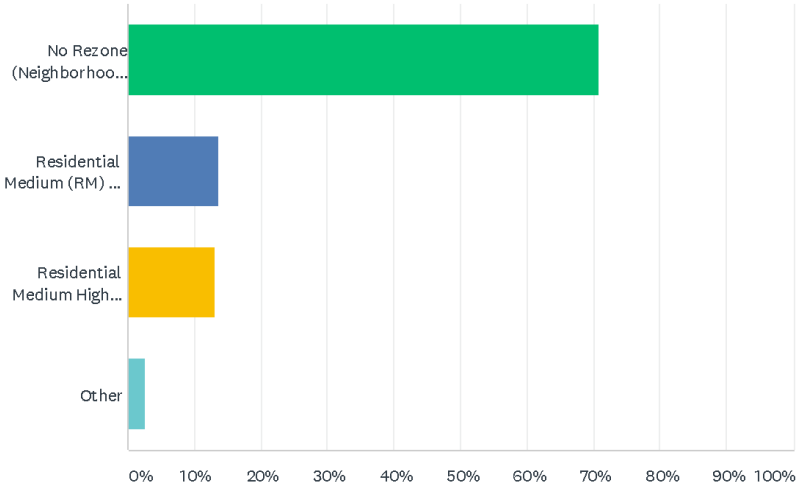
Answered: 434 Skipped: 183



ANSWER CHOICES	RESPONSES	
No Rezone (Business Park) (0 units)	56.68%	246
Residential Medium (RM) (24 units/acre)	20.51%	89
Residential Medium High (RMH) (30 units/acre)	18.20%	79
Other	4.61%	20
TOTAL		434

Q4 Site C: 990 Avenida Vista Hermosa (1.6 acres)

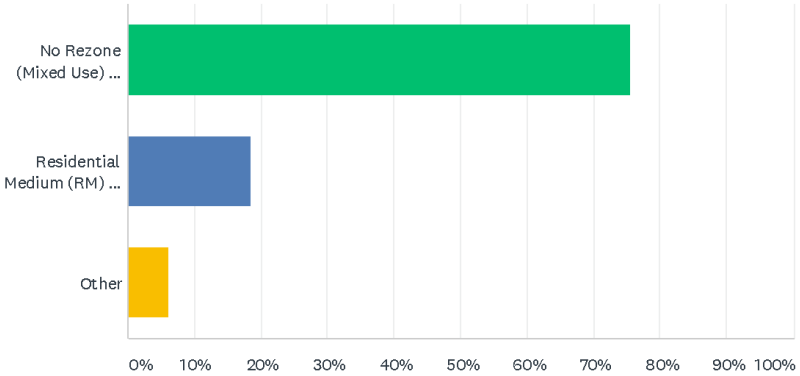
Answered: 438 Skipped: 179



ANSWER CHOICES	RESPONSES	
No Rezone (Neighborhood Commercial) (0 units)	70.78%	310
Residential Medium (RM) (24 units/acre)	13.70%	60
Residential Medium High (RMH) (30 units/acre)	13.01%	57
Other	2.51%	11
TOTAL		438

Q5 Sites D-Q: Avenida Pico (41.44 acres)

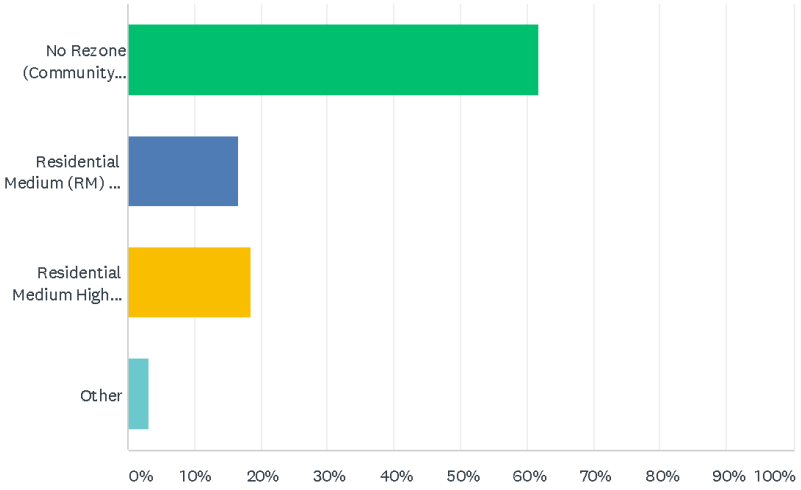
Answered: 418 Skipped: 199



ANSWER CHOICES	RESPONSES	
No Rezone (Mixed Use) (15 units/acre)	75.60%	316
Residential Medium (RM) (24 units/acre)	18.42%	77
Other	5.98%	25
TOTAL		418

Q6 Site R: 101 Pico Plaza (7.46 acres)

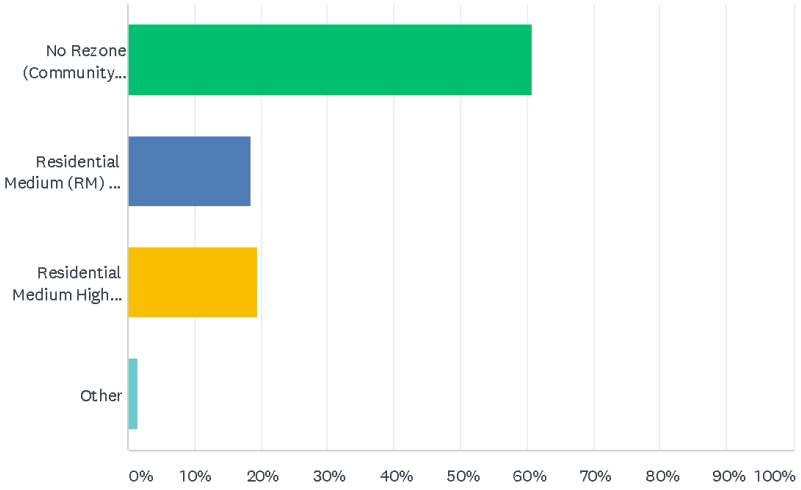
Answered: 440 Skipped: 177



ANSWER CHOICES	RESPONSES	
No Rezone (Community Commercial) (0 units)	61.82%	272
Residential Medium (RM) (24 units/acre)	16.59%	73
Residential Medium High (RMH) (30 units/acre)	18.41%	81
Other	3.18%	14
TOTAL		440

Q7 Sites S & T: 85 Pico Plaza (3.03 acres), 91 Pico Plaza (0.37 acres)

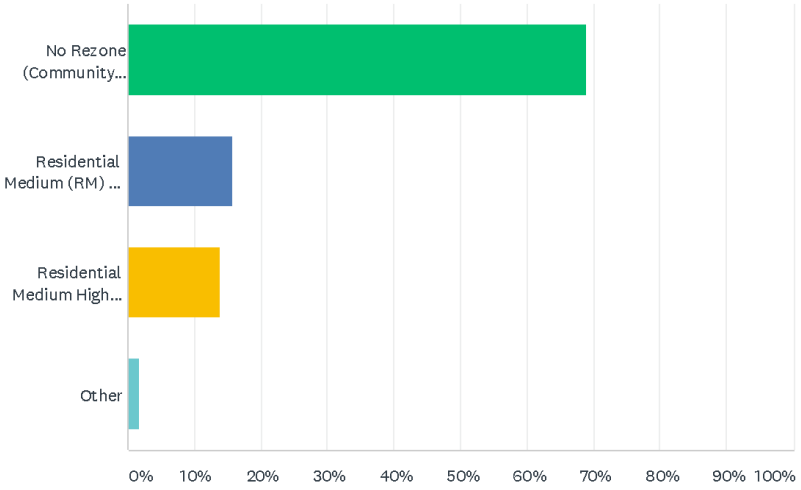
Answered: 438 Skipped: 179



ANSWER CHOICES	RESPONSES	
No Rezone (Community Commercial) (0 units)	60.73%	266
Residential Medium (RM) (24 units/acre)	18.49%	81
Residential Medium High (RMH) (30 units/acre)	19.41%	85
Other	1.37%	6
TOTAL		438

Q8 Site U: 416 E Ave Pico (0.48 acres)

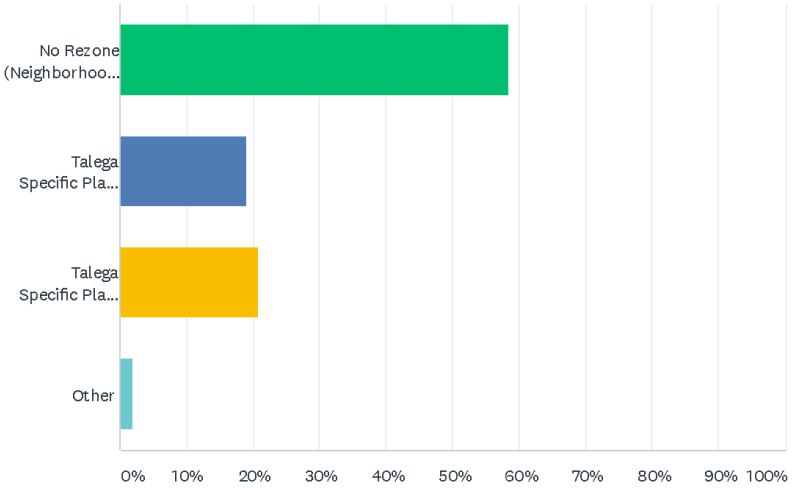
Answered: 437 Skipped: 180



ANSWER CHOICES	RESPONSES	
No Rezone (Community Commercial) (0 units)	68.88%	301
Residential Medium (RM) (24 units/acre)	15.79%	69
Residential Medium High (RMH) (30 units/acre)	13.73%	60
Other	1.60%	7
TOTAL		437

Q9 Site V: Pico (14.47 acres)

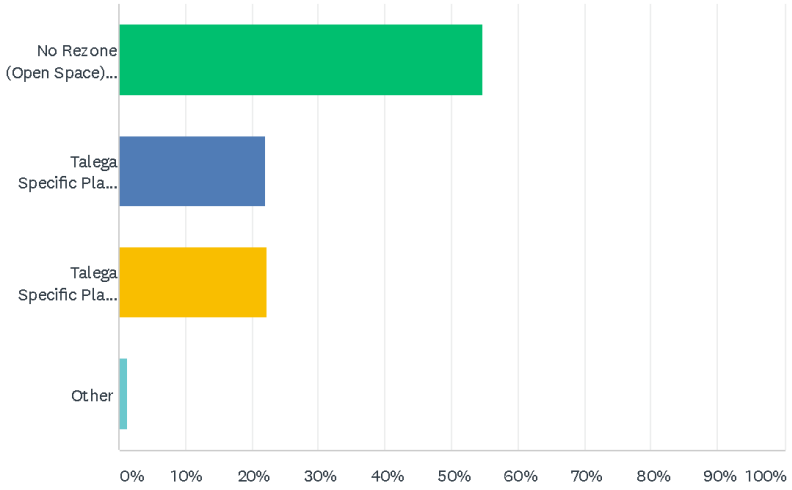
Answered: 440 Skipped: 177



ANSWER CHOICES	RESPONSES	
No Rezone (Neighborhood Commercial & Open Space) (0 units)	58.41%	257
Talega Specific Plan (TSP) Residential Medium High (RMH) (24 units/acre)	19.09%	84
Talega Specific Plan (TSP) Residential High (RH) (40 units/acre)	20.68%	91
Other	1.82%	8
TOTAL		440

Q10 Site W: Pico (7.5 acres)

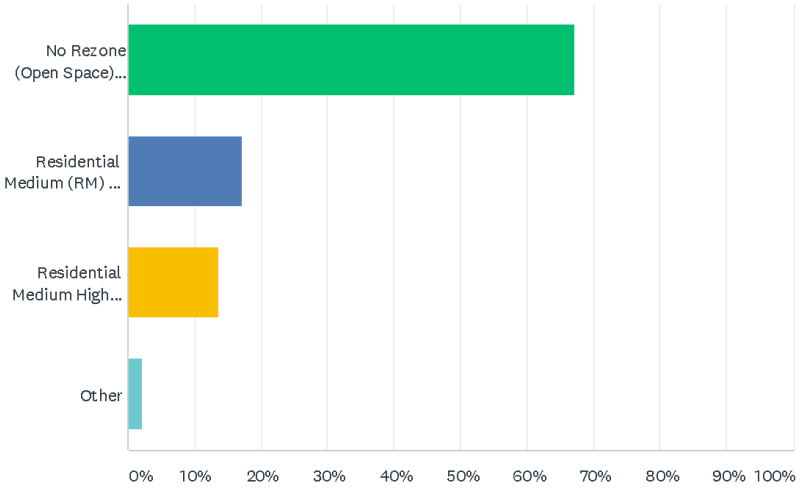
Answered: 442 Skipped: 175



ANSWER CHOICES	RESPONSES	
No Rezone (Open Space) (0 units)	54.52%	241
Talega Specific Plan (TSP) Residential Medium High (RMH) (24 units/acre)	21.95%	97
Talega Specific Plan (TSP) Residential High (RH) (40 units/acre)	22.17%	98
Other	1.36%	6
TOTAL		442

Q11 Site X: Camino Vera Cruz (3.33 acres)

Answered: 439 Skipped: 178



ANSWER CHOICES	RESPONSES	
No Rezone (Open Space) (0 units)	67.20%	295
Residential Medium (RM) (24 units/acre)	17.08%	75
Residential Medium High (RMH) (30 units/acre)	13.67%	60
Other	2.05%	9
TOTAL		439

Q12 Please list any other site/s the City should consider including in the Housing Element Update.

Answered: 191 Skipped: 426

#	RESPONSES	DATE
1	No to forced zoning . There is not enough infrastructure to support.	3/29/2021 5:35 AM
2	At the power plant	3/28/2021 2:21 PM
3	Near the county dump	3/28/2021 10:13 AM
4	North and West city boundary areas off La Pata	3/28/2021 8:28 AM
5	Surf Ghetto; S El Camino Real	3/28/2021 7:54 AM
6	None	3/28/2021 7:49 AM
7	none	3/28/2021 12:24 AM
8	No other sites! This is insane...	3/27/2021 11:28 PM
9	City Hall!	3/27/2021 9:11 PM
10	Cannot fathom how San Clemente can accommodate this number of units. There must be a miscalculation somewhere. We simply do not have the land for that many units.	3/27/2021 7:35 PM
11	more sites need to be explored south of the city away from the coast.	3/27/2021 3:26 PM
12	On boarder on Camp Pendleton and not near any existing housing.	3/27/2021 2:50 PM
13	Unincorporated land in Orange County away from residential	3/27/2021 2:40 PM
14	Why are there no sites being considered on the south end of San Clemente ?	3/27/2021 1:26 PM
15	Please consider the residents that live here and what we want, no more housing, we have RMV building right behind us, no more please.	3/27/2021 9:52 AM
16	There are no other sites. This city has kept its charm by following the citizens desires not by outside persons on a planning commision. If you do not live here you should not make decisions for the citizens of San Clemente.	3/27/2021 9:40 AM
17	We've fought the Toll Road and now you want to take away our open space for housing. ABSOLUTELY NO! The very far end of Talega is ok . Do not destroy our open land!	3/27/2021 9:38 AM
18	Height restrictions for the proposed housing due to established homes/views in applicable proposed locations.	3/27/2021 8:47 AM
19	No re zoning pay another city to take our housing	3/27/2021 8:15 AM
20	Inland open space areas	3/27/2021 8:00 AM
21	Rezone up as close as possible to the landfill or don't put them in our city.	3/27/2021 7:51 AM
22	Pendleton	3/27/2021 7:49 AM
23	None	3/27/2021 7:41 AM
24	High density housing is in north beach and that is part of the character of that area. It is near the train station, freeways and transportation hubs as well. The character of the area would remain the same if additional high density units were added. Other areas of San Clemente are not high density areas and adding high density units would change the current environment.	3/27/2021 7:39 AM
25	Near the SkatePark, Dog Park area	3/27/2021 7:20 AM
26	Building these units won't do anything and opens up the door to the state deciding to commandeer people' personal property to let others live there instead. They are like the TCA	3/27/2021 6:50 AM

	and nothing will ever be enough.	
27	the city-owned lot in North Beach on El Camino Real between the restaurant and the flower shop should be zoned for residential medium high for family housing	3/26/2021 11:37 PM
28	None	3/26/2021 11:01 PM
29	By the dump off La Pata.	3/26/2021 10:48 PM
30	San Clemente Island, Garden Grove, Fountain Valley, Santa Ana and in Fair Oaks next to Gavin and First Partner Newsom's house.	3/26/2021 8:32 PM
31	Where the old hospital is on Camino de los Mares.	3/26/2021 8:13 PM
32	None	3/26/2021 8:04 PM
33	None!	3/26/2021 7:58 PM
34	As far south and as far east as possible.	3/26/2021 7:44 PM
35	Talega has more open land where traffic will not be as impacted. Also, there are already low income housing areas in San Clemente proper, not in Talega though.	3/26/2021 7:39 PM
36	Best site is in Sacramento so the politicians in CA can see what they have created	3/26/2021 7:27 PM
37	Look in South San Clemente as well	3/26/2021 7:20 PM
38	Please just keep the architecture classy and with Ole Hanson feel. Tenants will honor and keep it nice.	3/26/2021 6:51 PM
39	None	3/26/2021 6:32 PM
40	Along La Pata, across from the business sector.	3/26/2021 6:00 PM
41	This is a good idea. Just needs to be in appropriate parts of the City.	3/26/2021 5:43 PM
42	City owned sites	3/26/2021 5:36 PM
43	None	3/26/2021 5:10 PM
44	Pico Plaza ,pico blvd ,south of the San Diego freeway has access to shopping,restaurants,post office, a large developed lot,close to high school and the major shopping. The site is perfect for a larger unit housing unit.	3/26/2021 4:33 PM
45	Irvine	3/26/2021 4:09 PM
46	Nothing on the north side of our city is appropriate for this type of rezoning.	3/26/2021 4:03 PM
47	None	3/26/2021 3:54 PM
48	Look for more sites in southwest San Clemente.	3/26/2021 3:41 PM
49	THE IDEA TO DO THIS IS UNACCEPTABLE	3/26/2021 3:41 PM
50	No other sites	3/26/2021 3:24 PM
51	If they're going to resume they should re-zoned as far down south San Clemente as possible. Maybe towards the Marine base	3/26/2021 3:20 PM
52	Here is the bottom line, if this is all state-mandated, we need to know exactly how many total units are required. I don't believe it is fair to require any of the sites to accommodate more than 24 units/acre. In addition, you need to consider parking issues. Calle Frontera itself is already an overflow parking lot for residents of Faire Harbour and the other dwellings/apts by the Pacific Coast Community church. There simply is no room for density housing here based solely and lack of parking. If it is forced upon this neighborhood, then the units must not exceed 2 stories. What happened to the senior living community that was to be built there? Taking parking lot space away from commercial businesses makes absolutely no sense, unless they are willingly offering it. This survey is requesting much input regardless of the lack of details provided. I understand it is a starting point, but residents have no educated basis for meaningful participation. I did my best, and I at least appreciate the opportunity to participate. Thank you.	3/26/2021 3:20 PM
53	Church or other faith institution sites	3/26/2021 3:09 PM

54	None	3/26/2021 3:04 PM
55	northrup grumman property	3/26/2021 3:03 PM
56	South El Camino District	3/26/2021 3:02 PM
57	None	3/26/2021 2:53 PM
58	Shopping center at old pier 1 site.	3/26/2021 12:28 PM
59	Please figure out how to assemble properties from various owners to then put out to RFP for affordable housing.	3/26/2021 11:56 AM
60	Affordable housing should be offered throughout the city!	3/26/2021 11:53 AM
61	The city should also consider redevelopment opportunities of blighted parcels and units.	3/26/2021 11:37 AM
62	North beach west of the hwy	3/26/2021 11:05 AM
63	This is going to ruin our beautiful city	3/26/2021 10:23 AM
64	None	3/26/2021 9:48 AM
65	Emergency Homeless Shelter	3/26/2021 9:13 AM
66	San Clemente is already over built. What the hell are you thinking about I will fight this idea day and night. No building is the right decision	3/26/2021 8:32 AM
67	I really don't think any of these areas in town should be rezoned for low/moderate housing. Worse case scenario is east end of Pico where there are already higher density buildings seems most logical. To build an apt complex in a random spot like Vera Cruz or Pico Plaza just doesn't make sense nor will it look good. Don't think neighbors will like it either. Seems crazy to build apts with an ocean view next to PCC on Frontera..only other place that seems possible is Rancho San clemente area. I think several lower density spots vs one big one would be better if absolutely needed.	3/26/2021 8:10 AM
68	None. There is no room. We must protect our open spaces and zoning.	3/26/2021 6:49 AM
69	None. Do not take our open space	3/25/2021 10:06 PM
70	Nothing. We are crowded here. Focus on re-developing the surf ghetto to mimic the funk zone in Santa Barbara. Build a bike park like every other up and coming city...this support our San Clemente culture. No gas Stations...gas is in the past!	3/25/2021 9:05 PM
71	Anywhere outside of the City of San Clemente. Ideally out of CA.	3/25/2021 8:52 PM
72	Out of town!	3/25/2021 8:32 PM
73	NO MORE HOUSING anywhere in our open spaces!	3/25/2021 8:17 PM
74	Out of Town!!! NOT IN SAN CLEMENTE.	3/25/2021 8:10 PM
75	Not in SC! Out of town!	3/25/2021 7:39 PM
76	I would like the city to identify city owned property that could be dedicated to this need. I the City to consider the 10 acres owned by the Emergency Shelter coalition on Pico/Calle de Cerro.	3/25/2021 6:24 PM
77	Out of town	3/25/2021 5:43 PM
78	La Plata that's it...would you ever put a shelter or low income housing in upscale neighborhoods ...depresses property values.	3/25/2021 5:07 PM
79	San Juan Capistrano	3/25/2021 4:40 PM
80	Somewhere else	3/25/2021 4:10 PM
81	Out of town	3/25/2021 3:59 PM
82	None	3/25/2021 1:41 PM
83	None	3/25/2021 1:29 PM

84	None in San Clemente	3/25/2021 1:00 PM
85	None	3/25/2021 12:31 PM
86	none.	3/25/2021 11:36 AM
87	Business area off S El Camino Real	3/25/2021 9:56 AM
88	Old hospital site	3/25/2021 9:34 AM
89	None. This is not about equitable housing. This is about DEVELOPERS MAKING MONEY - and lining politicians pockets. Period. San Clemente even considering cramming high density housing into our quaint beach town is a slap in the face to all residents to moved here to get away from that. Keep San Clemente a quaint beach town like our LEADERS PROMISED RESIDENTS.	3/25/2021 9:16 AM
90	Why go this route when you can set up a retirement hone facility for low income. I am from Illinois - this is what elmhurst, Oakbrook and Hinsdale did there and it helped a lower income population that was aging and that needed help because ssn is not enough to live off of. So instead of Nanking our elderly homeless - let's set up low income for retirees who will love their place and our community.	3/25/2021 9:14 AM
91	OUT OF TOWN	3/25/2021 8:27 AM
92	No additional housing. Period.	3/25/2021 8:17 AM
93	Anything along Pico is just increasing traffic. What about schooos to accommodate, bad plan.	3/25/2021 7:59 AM
94	Too many people. No more people	3/25/2021 7:43 AM
95	Not needed in San Clemente.	3/25/2021 7:40 AM
96	None	3/25/2021 7:31 AM
97	N/a	3/25/2021 7:23 AM
98	First and Foremost San Clemente NEEDS A HOSPITAL!!!!! It's UNACCEPTABLE that there is not even one Hospital in San Clemente.	3/25/2021 7:23 AM
99	None	3/25/2021 7:21 AM
100	San Clemente needs a Hospital	3/25/2021 7:14 AM
101	Suspend all construction, we don't have road and schools to accomodate	3/25/2021 7:14 AM
102	No where	3/25/2021 7:03 AM
103	Irvine San Clemente does not have Hospital irvine is better choice or Santa Ana	3/25/2021 6:56 AM
104	San Clemente Municipal Golf Course and the Bella Colinas Golf Course properties.	3/25/2021 6:49 AM
105	SC does not need anymore housing developments! Please stop and consider all the new houses already being build next door in SJC. It's too much!!!	3/25/2021 6:33 AM
106	Nowhere!!!! DO NOT BUILD THESE IN SAN CLEMENTE. Go to HUNTINGTON BEACH	3/25/2021 6:31 AM
107	None	3/25/2021 6:25 AM
108	None! Stop building.	3/25/2021 4:48 AM
109	None	3/25/2021 4:23 AM
110	We are already overwhelmed here with too many people and homes. We don't need SC to look like Huntington Beach or better yet Los Angels county beach cities.	3/25/2021 3:47 AM
111	Leave San Clemente the quaint small beachy town it is and was.	3/25/2021 1:22 AM
112	NO to adding more housing/traffic to our city.	3/24/2021 11:39 PM
113	None	3/24/2021 11:34 PM
114	No don't put more housing into an already impacted community	3/24/2021 11:00 PM
115	San Juan Capistrano	3/24/2021 10:42 PM

116	Lowest south west corner of Rancho SC. Close and easy access the city and much need usable space with least amount of impact on city.	3/24/2021 10:31 PM
117	None	3/24/2021 10:18 PM
118	None, no more building in san Clemente!	3/24/2021 10:11 PM
119	No location that increases traffic substantially! I would be okay with a location if it does not significantly impact traffic or the current neighborhood atmosphere. Forster Ranch, Talega and Avenida Pico are already high traffic areas.	3/24/2021 10:00 PM
120	There are NO other sites to be considered	3/24/2021 9:52 PM
121	There really is no adequate open space. Keep our open space open	3/24/2021 9:36 PM
122	It seems as if the same communities are targeted for undesirable housing and roads. Southwest and Southeast seem to be spared. Also 41 acres will destroy entire communities. So saddened by that lack of planning and vision to our incredible city. Or the protection of all the tax paying residents.	3/24/2021 9:31 PM
123	No other site! We do not need anymore housing in San Clemente! We are already over crowded. Let people save for 10 years to move here like I did!!!	3/24/2021 9:28 PM
124	East of LA Pata to Pico end	3/24/2021 9:28 PM
125	No rezoning. No low income units.	3/24/2021 9:25 PM
126	Pico east of lapata	3/24/2021 9:21 PM
127	None. Regional shelter out of San Clemente. We do not have city infrastructure to handle wrap around services needed.	3/24/2021 9:19 PM
128	What city owned properties are being considered?	3/24/2021 9:10 PM
129	None	3/24/2021 8:49 PM
130	We don't need ANY additional housing in our already crowded community.	3/24/2021 8:44 PM
131	Rancho mission Viejo in the commercial area or in the old staples / fitness 19 parking lot	3/24/2021 8:44 PM
132	None	3/24/2021 8:32 PM
133	None	3/24/2021 8:30 PM
134	None	3/24/2021 8:28 PM
135	Please no rezoning of open space. HIgh density housing should be in areas with close freeway access.	3/24/2021 8:28 PM
136	Beverly Hills	3/24/2021 8:19 PM
137	None	3/24/2021 8:18 PM
138	No more housing. Traffic is already difficult.	3/24/2021 8:14 PM
139	None! This is an ill advised plan that will negatively impact current homeowners and make the city less desirable to live in for many reasons. We don't need this project at all and it's mystifying and perplexing why you'd even consider it!!	3/24/2021 8:08 PM
140	None	3/24/2021 8:00 PM
141	not in the business park what so ever.	3/24/2021 7:53 PM
142	Next door to Kathy Ward and Chris Duncan.	3/24/2021 7:49 PM
143	Nowhere	3/24/2021 7:48 PM
144	The residents of San Clemente don't want this low income housing anywhere!	3/24/2021 7:46 PM
145	Consider never doing this!!!	3/24/2021 7:44 PM
146	No more housing	3/24/2021 7:43 PM
147	There are enough houses and apartments in SC. NO MORE BUILDING! Traffic is bad enough	3/24/2021 7:42 PM

	with annexing Talega after it was built LEAVEOPEN SPACE ALONE	
148	Newport Beach	3/24/2021 7:35 PM
149	We do not need anymore traffic or cars coming to Forster Ranch!	3/24/2021 7:33 PM
150	Noothers	3/24/2021 7:09 PM
151	South El Camino	3/24/2021 7:01 PM
152	Rezone the San Onofre nuke plant for low income hobo village.	3/24/2021 6:47 PM
153	City parking lot where the temporary homeless shelter was.	3/24/2021 6:39 PM
154	None	3/24/2021 6:12 PM
155	None	3/24/2021 5:53 PM
156	None	3/24/2021 5:51 PM
157	Mars	3/24/2021 5:50 PM
158	None	3/24/2021 5:35 PM
159	Why is nothing listed in the south end of town? Is it because council members live down there and don't want it?	3/24/2021 5:03 PM
160	Any city owned unused space that is not prime real estate, but has access to basic needs/busses/food, etc.	3/24/2021 12:44 PM
161	Talega is the best bet	3/24/2021 9:59 AM
162	ESC site Location: 33.445259 - 117.6147466	3/22/2021 2:48 PM
163	No More Housing	3/22/2021 12:21 PM
164	The site where an emergency shelter was planned.	3/22/2021 9:50 AM
165	Assessor Parcel Nos. 688-011-01 and 688-011-02 should be zoned for high density and added to the SB2 zone	3/18/2021 8:03 PM
166	I heard that ESC would donate the land they bought if it could be developed into affordable housing.	3/18/2021 8:02 PM
167	There are a lot of older apartments in the North part of town that could be changed over to this plan. These apartments are owned by slum lords and should be addressed.	3/18/2021 12:26 PM
168	None	3/18/2021 11:06 AM
169	Any public land should be included in these sites, per new legislation that designates that public land must be considered.	3/17/2021 12:18 PM
170	East of Talega	3/16/2021 8:33 PM
171	Regional shelter should be north or central OC where hospitals and facilities are located.	3/16/2021 6:51 PM
172	None. We do not have the resources to support this type of housing.	3/16/2021 6:31 PM
173	San Clemente is built out. None of these locations make sense for additional housing. Turning Walmart into apartments? Come on. This is unnecessary and ridiculous.	3/9/2021 9:34 AM
174	Do not place along freeway in Pico Plaza that is 1980's thinking. Place denser housing near open space and parks for quality of life. Please do better than the past.	3/8/2021 2:39 AM
175	none	3/7/2021 1:21 PM
176	More areas in South San Clemente. The City should focus on turning some of the current motels into low income, high unit housing.	3/4/2021 3:05 PM
177	Old police station site	3/3/2021 12:14 PM
178	NONE	2/28/2021 2:15 PM
179	Take 30 years to figure it out	2/27/2021 6:21 AM

180	No more housing. Open space is needed for preservation of environmental habitats. Water is so expensive through the city and concerning about new building in times of drought.	2/25/2021 7:53 PM
181	Downtown	2/25/2021 9:23 AM
182	None	2/25/2021 5:29 AM
183	No more housing	2/24/2021 8:31 PM
184	The City should work with professional urban planners to create housing in locations with access to public transit, grocery stores, and businesses. Asking publicly will only create more NIMBY issues in a city so resistant to accepting diversity of race and income. Transitional housing also needs to be build for those who are unhoused/homeless so that they can be safe as they get back on their feet.	2/24/2021 7:45 PM
185	Hospital	2/24/2021 7:19 PM
186	None	2/24/2021 6:54 PM
187	-None	2/24/2021 6:53 PM
188	Sue SCAG - restore local control	2/24/2021 6:41 PM
189	Don't understand the point here. Councilwoman Ferguson will complain about not receiving the results.	2/24/2021 6:39 PM
190	Annex open space!	2/23/2021 7:22 PM
191	Downtown Old commercial area	2/8/2021 8:52 PM

The City also conducted a Housing Needs survey in December 2020, a Housing Types survey in March 2021, and an Emergency Shelter survey in April 2021. The survey results are shown below.

FlashVote

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FlashVote helps you make a difference in your community

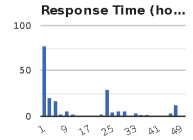
Survey Results: Housing Needs

Survey Info - This survey was sent on behalf of the City of San Clemente to the FlashVote community for San Clemente, CA.

These FlashVote results are shared with local officials

192
Total Participants
182 of 485 initially invited (38%)
10 others
Margin of error: ± 7%

Applied Filter:
Locals only
Participants for filter:
164

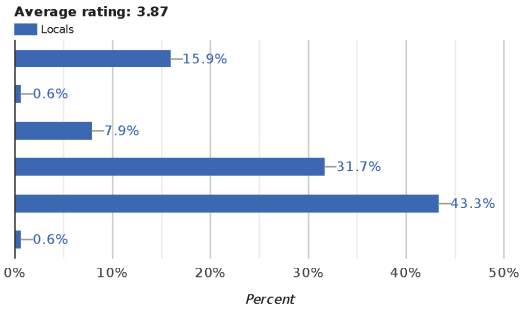


Started:
Dec 9, 2020 11:09am PST
Ended:
Dec 11, 2020 11:00am PST
Target Participants:
All San Clemente

Q1 Please rate how expensive or inexpensive you think housing is in San Clemente:

(164 responses by locals)

Options	Locals (164)
Very Inexpensive (1)	15.9% (26)
Slightly Inexpensive (2)	0.6% (1)
OK (3)	7.9% (13)
Slightly Expensive (4)	31.7% (52)
Very Expensive (5)	43.3% (71)
Not Sure	0.6% (1)

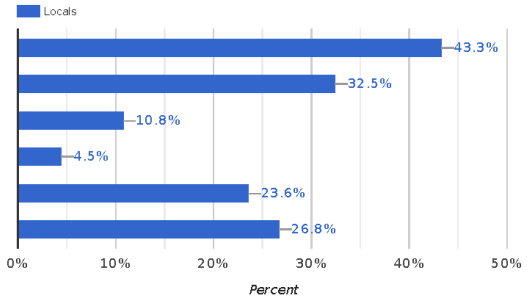


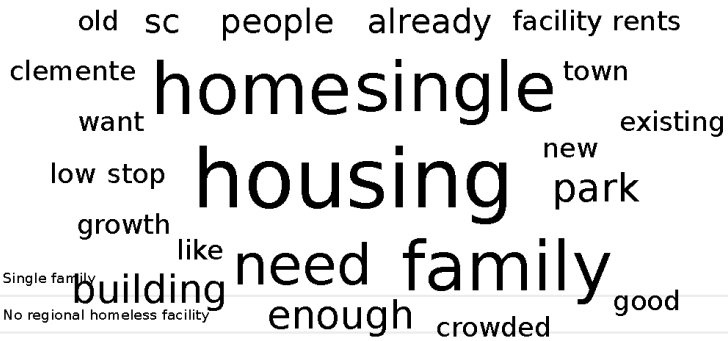
Q2 Which of the following do you think are the best options for more housing in San Clemente? (Choose all that apply, if any)

(157 responses by locals)

Options	Locals (157)
Duplex, triplex, and four-plex homes	43.3% (68)
Small multifamily buildings (up to 15 units)	32.5% (51)
Mid-size multifamily buildings (15-50 units)	10.8% (17)

Options	Locals (157)
Large multifamily buildings (50-200+ units)	4.5% (7)
Tiny Home communities	23.6% (37)
Other:	26.8% (42)





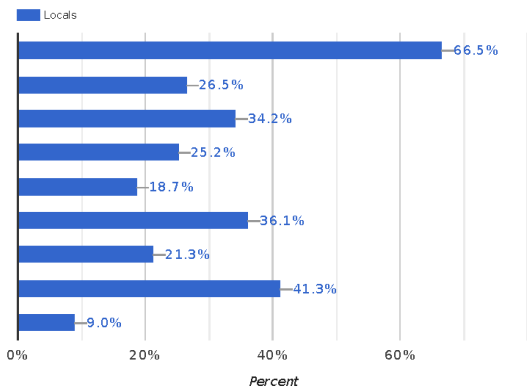
Single family
No regional homeless facility
SC does not need any new housing and does not need any growth.
Homes
condo are afordable entry level homes and maybe rented by the owners
none of the above. Single Family
We don't need more people in SC, it's crowded enough. Stop this please!!!!
I don't want more housing crammed into SC
I don't believe the city needs more housing
Section 8 housing with walking access to bus and trains, grocery stores, and medical facilities.
single family homes
We have enough housing.
mixed use business and residences
Single family
Medium to large single family homes
No more building of housing
Single family homes
No more housing.
Single Family Residential

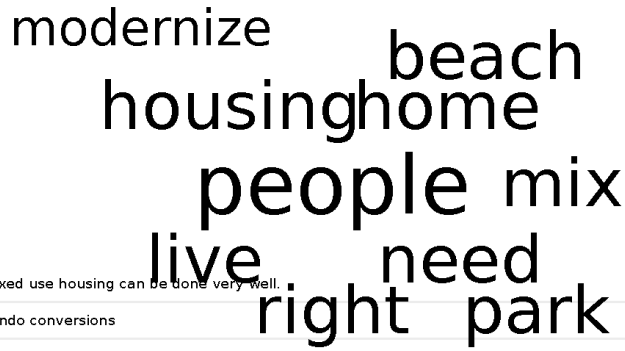
less expensive single family homes
Stop building duplexes and up in town because there are not enough parking for single homes
I would need more information before answering this question. Parking is already a significant pro
We don't need more housing
More like starter homes for young folks
None. Crowded enough
Why do we need more housing. Growth is not always good. How will the infrastructure handle it?
This town is built out.
Single family home communities.
Ok as is
None of these, if people want more affordable housing they should move inland.
Many apartment complexes inside Clemente are 85+ years old... I'd like these old buildings demolished
No development until power grid and water supply is addressed
No more expansion building.
Manufactured housing
Luxury beachfront homes
We should record low-cost rents already existing so we can add to our State required inventory.
Percentage of low income housing in all new housing
The problem is where are all these people going to park there cars parking is already a nightmare!
None
None of the above
single family homes only

Q3 Which of the following would you like to see more of in San Clemente, if any? (Choose all that apply)

(155 responses by locals)

Options	Locals (155)
Renovating older buildings	66.5% (103)
Teardowns (replace old houses with new houses on site)	26.5% (41)
First time homebuyer assistance	34.2% (53)
Accessory dwelling units (apartment or cottage on a lot with an existing home)	25.2% (39)
Senior housing complexes	18.7% (29)
Affordable housing for low and moderate income households	36.1% (56)
Studios and one-bedroom apartment buildings	21.3% (33)
Mixed use housing (retail on first floor, living spaces above)	41.3% (64)
Other:	9.0% (14)





Mixed use housing can be done very well.

condo conversions

ADU's

We don't need more people in SC, it's crowded enough. Stop this please!!!!

We should ban zoning laws and let the market work and meet the demands of the people.

Truly low income housing that is a home for a family than costs LESS THAN $400K

If you can't afford to live at the beach, look elsewhere...beach living isn't a right.

Lower taxes to offset expensive homes

Current mix is just right.

Parking needs to be addressed. Maximum occupancy a problem.

Nothing

How about we modernize some of El Camino. Or modernize some of the Del Mar shops and restaurants.

Where will all these people park there cars?

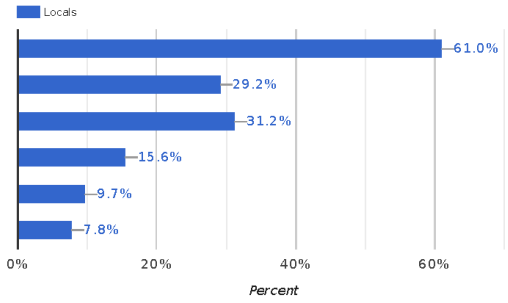
None

Q4 Which of the following are TRUE for you, if any? (Choose all that apply)

(154 responses by locals)

Options	Locals (154)
I'm living in something pretty close to my ideal home now	61.0% (94)
I'd like to move to something more ideal, but it would cost too much	29.2% (45)

Options	Locals (154)
I'd like to learn more about how the city plans for housing growth	31.2% (48)
I'd like to learn more about affordable housing and how it gets funded and financed	15.6% (24)
I'm not really that interested in housing plans or development	9.7% (15)
I'd like to know more about:	7.8% (12)



condo conversions that help me get my equity out for more investment

How to stifle high-density housing

Local housing for the homelessness

Status of a regional homeless shelter NOT in SC

Some of the ideas you have listed previous and their successes elsewhere.

Stopping this affordable housing silliness

how increased housing will effect schools, parking, and traffic in the city

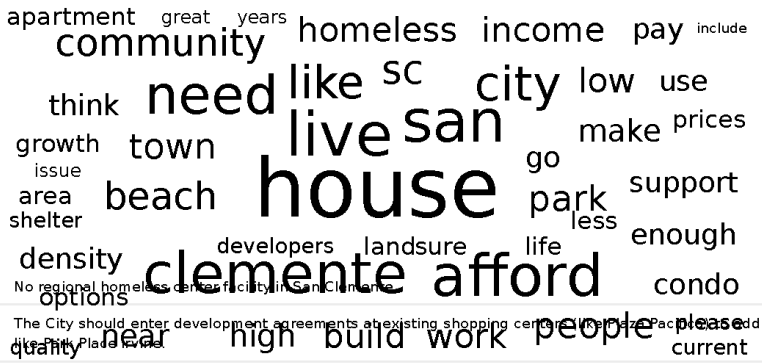
incentives to renovate older parts of town with better quality housing

Happy with present situation, looking forward to purchasing.

how rental pricing is determined in san clemente

Q5 Any other comments or suggestions about ways to get more housing choices in San Clemente?

(50 responses by locals)



No regional homeless center/facility in San Clemente.

The City should enter development agreements at existing shopping centers (Ikea, Plaza Pacifica) to add apartments/condos -- like Pitk Plaza Irvine.

San clemente needs no growth. No more housing required.

I understand there is concern about the RHNA numbers being too high. That might be the case, but I'm pretty sure that if the numbers were adjusted in the city's favor, we would still be falling far short of anything that could be called meaningful progress. Council has expressed support in pushing for revisions, I hope they don't mistake that for making progress on housing.

I'd like to see a structure like the outlet center but with housing above. I've seen this well done in Europe and in Irvine. Also, with growth in the surrounding areas like rmv we dont need to add as much.

Why do you constantly take on the assumption that cities need to grow!! Enough is enough. We don't need more people in SC, it's crowded enough. Stop this please!!!!

Assisting homebuyers that have steady income with help.

back off parking codes for housing ,,,,if apartments and condos have the same codes why are condos so difficult in san clemente

We need affordable housing for families and seniors.

Opposed to high density residential. San Clemente needs to better control residential land uses so they are not abused by sober living and others for commercial purposes. San Clemente should be encouraging residential solar and ADU's.

landlords are increasing rents during a pandemic and I think it is heartless and unbelievable that they are allowed to do this.

We don't need more housing choice in SC. We need to give our current residents quality of life that they pay so much for. This includes less crime, less homeless being dropped off, no motel/hotel vouchers allowed in SC, etc.

Please reduce taxes, regulations, and zoning laws. This allows creative and innovative people to create products and services to meet the needs of the people.

We dont need affordable housing. If you can't afford the community...look elsewhere! I say this...and I'm a renter! Beach living is a luxury...and if you can't afford it...live somewhere else!

This city population's NIMBY attitude and ineffective City Council has created a culture of racism, white supremacy, and economic inequality. A homeless shelter and services need to be built, supported, and sustained in San Clemente! Prices for housing are out of control and this city cannot sustain itself if there isn't affordable housing to buy, rental assistance during a pandemic, and Section 8 housing near transit, grocery, and medical services.

Homeowners often pay to offset those who can't afford to live in the area, and that's not ok. Charging the working class who have worked hard and continue to do so to pay for others isn't ok. After years and years of sacrificing, I'd like to enjoy the fruits of my labor.

San Clementeans like our town the way it is. Oppose change.

We all know what a gem we have in this city and while I am blessed to have found an "affordable" apartment in a great location, as I speak to others apartment prices have gone sky high. Low income housing can sometimes bring an undesirable crowd but that's not to say it can't be explored.

Have public forums/dialogs that include ONLY people who live here - not developers or government employees.

Like the extension of the 241, just say NO! And don't do it...

A homeless shelter and permanent supportive housing like Ed Connor is proposing DO NOT belong in SC nor do high rise buildings. Keep the small town feel please.

Do not wish to see homeless shelters or housing.

Sad that young adults who grew up in San Clemente rarely can afford to live here.

Infill. Old San Clemente is gone - it's time to accommodate for growth in California.

There is no parking so there should be no more multi-family homes. The questions are not real questions because others need to be incorporated in the equation.

Let the free market determine housing needs in San Clemente

I think San Clemente is perfect the way it is. I would hate to see it turned into a bigger city with people living on top of eachother with ugly apartments and condos.

Housing density and street parking issues go hand in hand. As housing density go up then parking will be an issue. I am in favor of resident parking permits. Make money for the city and pay to park on the streets.

Sure would like more information on this subject. Including how much undeveloped parcels exists. Would you consider provided issues and options to educate the public. I certainly like what Laguna Niguel has done near the railroad stop there. I seems smart and promising.

We don't need more housing. City is crowded enough

No regional shelter in San Clemente! We cannot support it.

We've owned 3 houses in SC, currently renting. But I can't afford to retire here. Sad. My great uncle was Ole Jr. been here or near by for 65 years.

Stop the growth. The new homes in RMV will thousands of homes to neighboring communities. The non-toll road will connect SC to other parts of the state as well. How do the roads, water, sewer, schools keep up? More Mella Roos? Higher taxes? What about quality of life? Close Del Mar to traffic. Add parking structures downtown. Make SC more small business friendly. No more residences please.

Living at the beach is expensive! I waited my whole life and saved up to be able to live at the beach. I lived in the Inland Empire where I could afford to live until I had enough money to make the move. Beach communities that do not have a lot of empty land do not need to start building low income housing.

Hope this survey is not a marketing gimmick! Do not sell my information!

Use some of are open space to meet the requirements of low income housing

More senior living options...

None

Isn't San Clemente built out? Why decrease the quality of life in a coastal town with increased density? Perhaps some older parts of town could be redeveloped with better quality MF housing but the infrastructure cost would be significant and likely uneconomical for SC. Affordable housing is a Regional issue and the County should look at less desirable open space for developing more affordable housing.

Quit all new construction Create sustainable housing

I live in San Clemente for 26 years I still cannot buy a house my children were born here I worked for the community of San Clemente how could I have information for low-income houses that we qualify? Thank you Bertha Wynne

I am not sure if I checked the mixed use box earlier, but the Los Molinos district may provide some potential for mixed use development.

Does the City need help identifying Short Term Rentals and monitoring usage and collecting TOT from them? I can help. I am the VP of Sales and Government Relations for https://Deckard.com reach out to me on my cell (949) 701-0501 or email Dustin@Deckard.com

I think this is great that San Clemente is seriously considering housing alternatives.

No low end "affordable housing". San Clemente is the most affordable beach community as is.

We must be a more diverse community and must support those who are less fortunate regardless of race color creed orientation. This community has many individuals who are overtly and covertly racist. And they are proud of it.

I don't want more development

Simplify permitting process. Be cooperative and not as obstructive

We live in a highly desirable area and new housing and new inventory will only benefit in lowering the housing prices. But with limited land to build on in coastal communities this will always remain a difficult task to keep housing "affordable."

no

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FlashVote

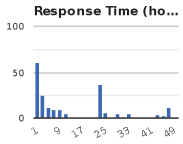
Survey Results: Housing Types

Survey Info - This survey was sent on behalf of the City of San Clemente to the FlashVote community for San Clemente, CA.

These FlashVote results are shared with local officials

193
Total Participants
190 of 504 initially invited (38%)
3 others
Margin of error: ± 7%

Applied Filter:
Locals only
Participants for filter:
162

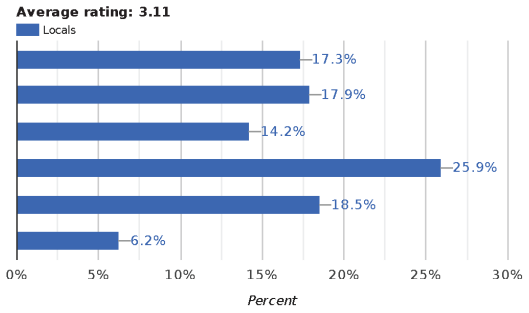


Started:
Jun 23, 2021 11:10am PDT
Ended:
Jun 25, 2021 11:01am PDT
Target Participants:
All San Clemente

Q1 How much do you agree or disagree with the following statement? "The range of housing costs in San Clemente should match the range of people's incomes"

(162 responses by locals)

Options	Locals (162)
Strongly Disagree (1)	17.3% (28)
Disagree (2)	17.9% (29)
Neutral (3)	14.2% (23)
Agree (4)	25.9% (42)
Strongly Agree (5)	18.5% (30)
Not Sure	6.2% (10)

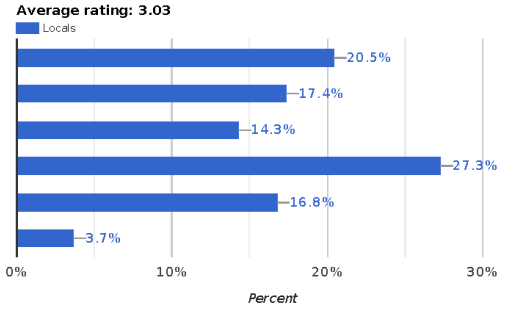


Q2 How much do you agree or disagree with the following statement? "San Clemente should remove barriers to building smaller and less expensive housing units"

(161 responses by locals)

Options	Locals (161)
Strongly Disagree (1)	20.5% (33)
Disagree (2)	17.4% (28)
Neutral (3)	14.3% (23)

Options	Locals (161)
Agree (4)	27.3% (44)
Strongly Agree (5)	16.8% (27)
Not Sure	3.7% (6)

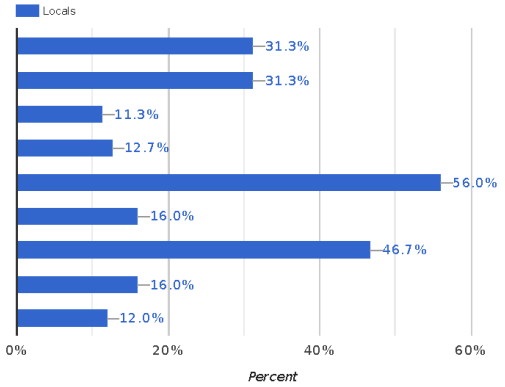


Q3 In our December 2020 survey, there seemed to be significant support for duplexes, triplexes, fourplexes, and small multifamily buildings (5 to 15 units).

Where in San Clemente would you put multifamily housing like duplexes, triplexes, fourplexes, and small multifamily buildings (5 to 15 units)? (Choose all that apply)

(150 responses by locals)

Options	Locals (150)
Near bus or train stops	31.3% (47)
Near shopping or town centers	31.3% (47)
Near trails or bike pedestrian facilities	11.3% (17)
In single-family zoned neighborhoods	12.7% (19)
In multi-family zoned neighborhoods	56.0% (84)
In business park or industrial areas	16.0% (24)
In renovated buildings (vacant warehouses, former public facilities, former commercial areas, etc.)	46.7% (70)
Not Sure	16.0% (24)
Other:	12.0% (18)



Talega

Nowhere. I already have a mortgage. I don't want my property value to go down.

San Clemente is working on a 100 year plan, and we're almost built out. DON'T CHANGE IT.

Nowhere. We do not want to look like Dana point

San Clemente has enough of this already. Build SFR's only and not zero lot line property or aptmts

I don't believe this is the answer to the housing situation. High density housing doesn't help.

former prisons or hospitals that have closed

Annexation to the city of San Clemente county planning areas 5 & 8 that are on our border, make use

I think mixed use areas. I prefer to avoid concentrating one type of housing in an area.

four plex has more parking than the miramar and casino put togeghter and they tell me i need more

I don't want to balloon the population of San Clemente and turn it into a high density city!!

I don't support small multi family units

It would have to be democratically planed.

No where

On the dump property when available.

any unused space used effectively,still providing adequate ammenities/parking/life quality for all

In more central parts of Orange County or San Diego County

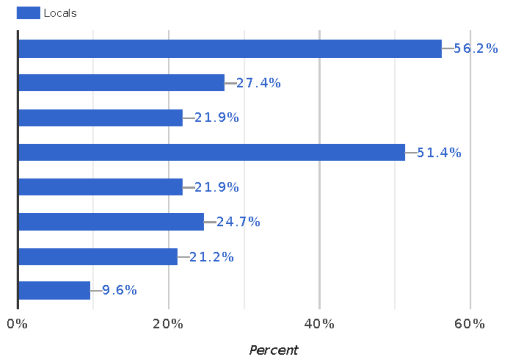
Q4 Similarly, our December 2020 survey showed that many people wanted to see older building renovation.

Where do you see the biggest opportunity for renovating older buildings for housing in San Clemente?

(146 responses by locals)

Options	Locals (146)
Renovating old commercial to new mixed-use (commercial and residential)	56.2% (82)
Converting commercial to multiplex housing	27.4% (40)

Options	Locals (146)
Converting warehouses to multiplex housing	21.9% (32)
Fixing up existing apartments	51.4% (75)
Downtown and/or nearby areas	21.9% (32)
El Camino Real	24.7% (36)
Calle de Los Molinos and nearby areas	21.2% (31)
Other:	9.6% (14)



Find businesses for long vacant lots near El Camino Real and the 5.

Not needed

Telaga - remove the suburban blight or let them incorporate as to remove the San Clemente moniker.

Let the market decide. HELP the market, rather than become a historical hinderance.

Renovations should not increase the number of houses. Population is already too high.

Former Staples shopping center (Via Pico Plaza); Converting golf course(s) to 9-holes with housing

Annexation to the city of San Clemente county planning areas 5 & 8 that are on our border...

north beach

Not sure

not near the beach

Again, I don't want San Clemente to become a high density city.

None

Mixed used Zoning with more pedestrian and bike friendly lanes /paths

North Beach

Q5 Any other comments or suggestions about where or how to add more housing in San Clemente?

(56 responses by locals)

Just remove the barriers. Multi-use buildings (Business and housing) add charm to a location when planned properly.

The old Staples retail center is a perfect place to have housing and a community Plaza with green space. It could have some retail, however would need to have a different mix that would support the residential aspect of the redevelopment. Many of the current retailers are 'tired' or could be moved.

Yeah.... Don't do it.

SFR zones

Affordable housing is needed really badly. Our children are forced to move far away as they cannot afford to live here ven with relatively well paid jobs.

San Clemente does not need to jam in low income housing and apartment buildings! Stop exploiting our Spanish Village by the Sea for greedy developers! Watch the news for Pete's Sake-over 180k people have left CA in 2021 alone. Numbers are expected to triple in 2022. Remote work is here to stay and people are fleeing CA because of overcrowding, high taxes, and homeless issues. We don't need more housing in SC.

San Clemente City has the highest obligation to Ole Hanson's vision, and to our long-term city plan to not jump on the high-density, low cost housing bandwagon. California as a whole is failing, and if anything it's the job of the city to separate and insulate ourselves from the truly stupid direction and decisions made by Sacramento..

People work hard to be able to live in SC and are willing to pay the high price to do so. Stop turning our small city into a dump!

Affordable housing for all income brackets (at less than $1M) is needed - not just for the poorest residents

Consider some "OpenSpace" that yields minimal current public benefit.

Build a homeless shelter! We need to support our current population AND build housing that can be bought by people for under $500k!

Having a two story parking for downtown.

We can’t handle more traffic on our already congested roads. We don’t need any more housing.

Open more affordable housing in San Clemente to section 8 and other state ran programs to reduce the homeless population

We need more housing for low to middle income people.

When government gets involved hey tend to fail in achieving heir result. The open market usually creates the best results

Please remove all barriers to housing development such as zoning laws, excessive taxation, and government involvement. The best way for decisions to be made is through free individuals and the price system.

I see that areas that have switched to high density housing deteriorate the beauty of any city, IE San Diego, and parts of Dana Point. The 4 story apartment complexes make the city look trashy and this should not be allowed.

We who have lived in San Clemente for years see ourselves priced out of the market. So this changes the nature of our community.

The open spaces should be preserved. No new housing in open spaces.

I’m in favor of in fill with multi family dwellings. I’m not in favor of converting commercial or the industrial park to build apartments. I think those properties tax generators the city should leave as is.

Wal-Mart and former Staples parking lots. Also, consider up zoning of existing multi-family areas.

How about building parking structures on city parking lots and adding housing above! There are several around the downtown area.

I don't believe we need more housing in San Clemente. We could fix up what is already here but no more development.

With the SB2 zoning and the CA State low-low, low, & moderate housing units, plus or minus 1000 'new' units while preserving open space is a doable project. It will just take some work on agreements, owning renting plans, qualifications for and such nuts and bolts decisions. Live, work, shop, enjoy San Clemente.

We need a variety of housing opportunities. Someone who just gets their first job after graduating from college can’t even find housing here. Let’s change it so everyone has a chance to buy a home if they work hard and need that first home opportunity.

i tried to convert my 4 units to condos and get a lot split im told i dont have enough parking i have more parking than the miramar and casino put together but im not rich ..no tandum parking on 3 units and more ,,,undergrounding alleys instead of our common streets ,,, work force housing but whos working ? oh the guy with the ladder on his truck !

I do not think San Clemente needs more housing, especially multi-family housing.

Build East

Thanks for the survey to seek input.

Annex and build on property to the East of present San Clemente city boundaries seems to be the most logical to me!!

My suggestion is to get rid of people with dangerous ideas such as 2nd Amendment sanctuary cities.

We desperately need low income housing and homeless shelters.

Hold a public meeting for all of us to better understand the issue and the options. I worry that developers and wealthy residents will unduly influence the decisions.

limit the housing do not turn san clemente into santa ana.

Need to create housing for homeless like they are doing in LA with small container units with social services and care onsite

There is enough housing in San Clemente! Go and develop inland areas.

This is ridiculous. We're trying to solve a problem that is not solvable. Of course more people want to live here; there are roughly 40 million people in CA and many want to move to the beach to live. That's not possible. Stop trying to "accommodate" and recognize what San Clemente IS!! It's not an inland city where employment location is directly linked to living locale. Take the time to study other CA coastal cities to figure out what they have done, or more importantly, not done.

New housing should be press out throughout the city, not concentrated in one location. Old, unused or dilapidated building can be removed and medium density (20-50 units) can be built.

With housing more expensive than ever, developers are able to make unprecedented profits. This creates rare opportunity for the city to increase the in-lieu fees for multi-unit buildings, and to increase the percentage of units required to be designated "affordable". If we let this opportunity pass us by, we may not get another chance for a decade or more. When the market cools down the rates can be modified, if warranted.

With all due respect, as a small town can’t we just keep it a small town and not raise crime rates...

I would love to see more senior discount housing available. As we roll in to retirement years, renting is no longer afordable to stay in my home town of 30+ years.

let larger lots add a rental property where it fits.

Buildings with basements for parking. Green sustainable architecture could be subsidized to make living in small quarters of multi unit homes more attractive in inland San Clemente.

If you can’t afford to live at the beach...live somewhere else

I think it's great that SC is looking at this issue.

Space should be used efficiently. There is condemned, blocked off and unused space, while people struggle to find parking & housing. why is this space going unused? I assume those are the "barriers" mentioned, but don't have enough information. space that isn't used currently should be used, there is opportunity for economic growth and resolve issues of housing and parking. Building of affordable and multi-family complexes, however, should be done with quality of life in mind - for existing and future residents. Is there enough parking for all who will reside? Are things like laundry, storage, transportation easily accessible? The last thing San Clemente residents want is multi-unit/affordable housing turning into an eye sore and source of traffic congestion and drain on resources that will actually drive UP the cost of living. There are plenty of opportunities and ways to go about making this work for all, putting needs/concerns of those opposing construction of this type of housing

Why do we need to add.

Limit new housing to smaller homes

This is a beach community. It is expensive as are all beach communities. People have earned the right to live at the beach through hard work and savings. We should not turn this town into an apartment and condo place with low cost housing.

No more single family housing tract homes

Make sure all ages can afford living here

How will an increase in population affect the shared use of public space? And if the population is increased—how will enough parks and public recreation space be created so that the current quality of life isn’t ruined?

If you are going to approve more high density housing in San Clemente, you need to approve the Toll Road. And not through the center of the city! It should have been approved years ago and still needs to be approved to run behind the city as originally planned and then down Cristianitos to the 5.

Add projects east of the I-5 - possibly Telega, etc. in that area.

There are other places to live which are cheaper they should investigate those opportunities

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San Clemente Emergency Shelter Survey

Survey Methodology*

From March 16, 2021 to April 1, 2021, Probolsky Research conducted a survey in-person and by telephone among representatives from each of the designated non-profit organizations that fund or operate emergency shelters in Orange County.

This survey was conducted as part of a monitoring program in the City's Housing Element. And is the third survey we have conducted for the City. Comparison data is included.

Probolsky Research specializes in opinion research on behalf of corporate, election, non-profit, government and special interest clients.

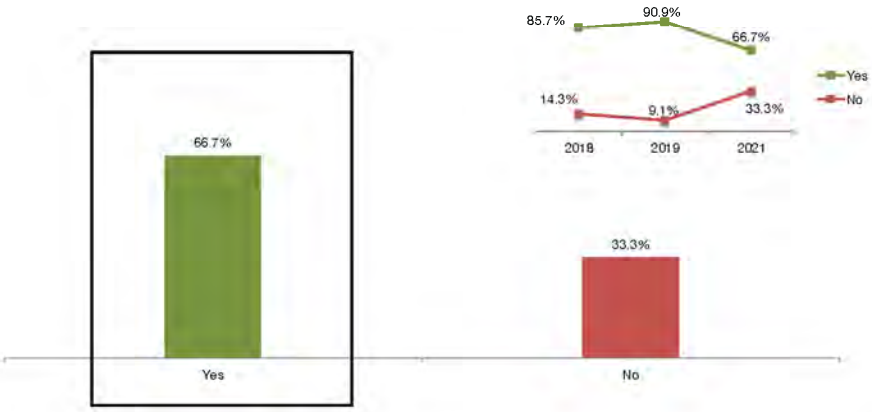
PROBOLSKY RESEARCH

*Due to rounding, totals shown on charts may not add up to 100%

1

67% operate an emergency shelter in Orange County

Question 1: Do you currently operate an emergency shelter in Orange County?

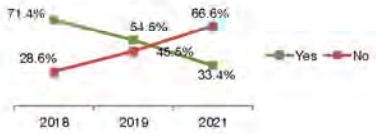


PROBOLSKY RESEARCH

2

66% did not considered opening an emergency shelter in Orange County in the last year

Question 2: In the past year, have you considered opening an emergency shelter in...?*



*This question was slightly different in previous years.

3

Costa Mesa, Huntington Beach, San Clemente, and Santa Ana were considered

Question 3: In what Orange County cities/communities, have you considered opening an emergency shelter in the past year?
[AMONG THOSE WHO SAID "YES" TO Q2]

"All cities, always looking for new opportunities"

"Anywhere in OC, San Clemente"

"Santa Ana, Huntington Beach, Costa Mesa"

4

Varied reasons for not considering a new shelter

Question 4: Why didn't you consider opening an emergency shelter in Orange County cities/communities in the past year? [AMONG THOSE WHO SAID "NO" TO Q2]

"Covid"

"Focusing on rental assistance"

"Occupancy rates are low"

"We develop and own them, don't operate"

"No viable conversation"

PROBOLSKY RESEARCH

5

Funding and operational structure are the top barriers organizations have faced when considering opening a shelter

Question 5: What are the barriers your organization has faced in the past year when considering opening a new emergency shelter in Orange County cities/communities?

"Funding and time"

"Not part of operations plan"

"Government guidelines - no accountability for addicts"

"NIMBY, Cost and time of regulations"

"Not our mission"

"Location and support (funding)"

"Funding for lease"

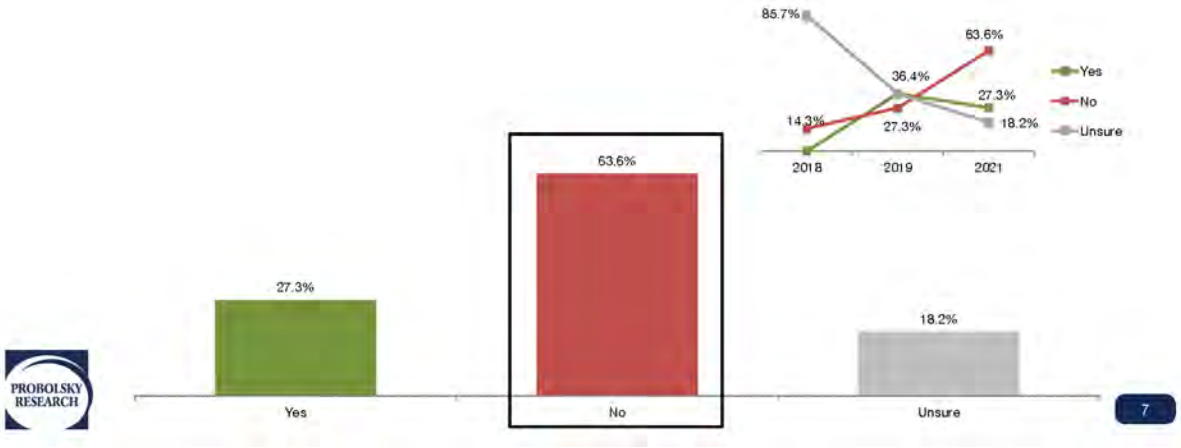
"Communicating to government that costs go up annually"

PROBOLSKY RESEARCH

6

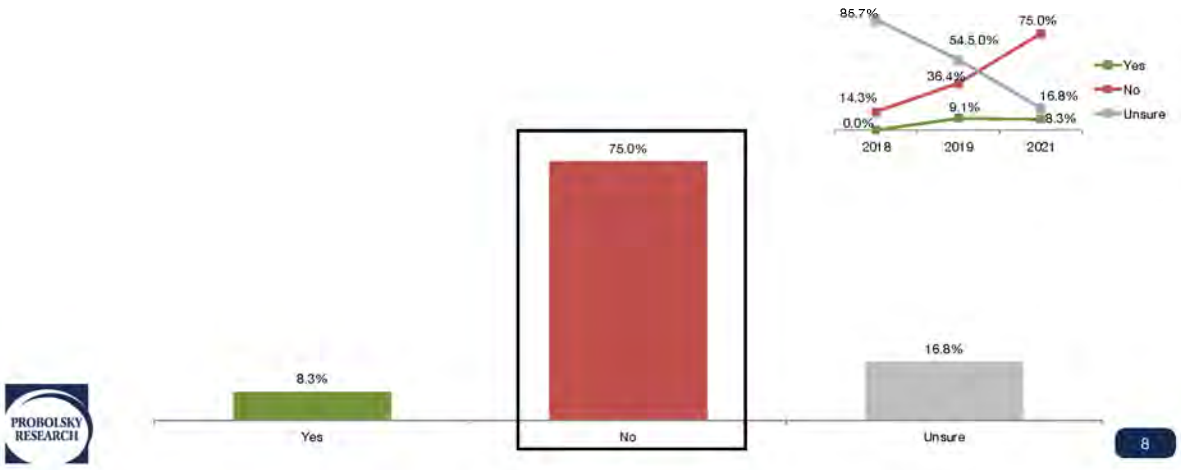
64% say the Emergency Overlay Zone is not a barrier for developing a shelter in San Clemente

Question 6: The City of San Clemente has an Emergency Overlay Zone where shelters can be located. Is the **specific location** that the City has established, a barrier for developing a shelter in San Clemente?



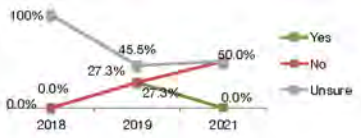
75% say re-use limitations are not an obstacle in developing a shelter in San Clemente

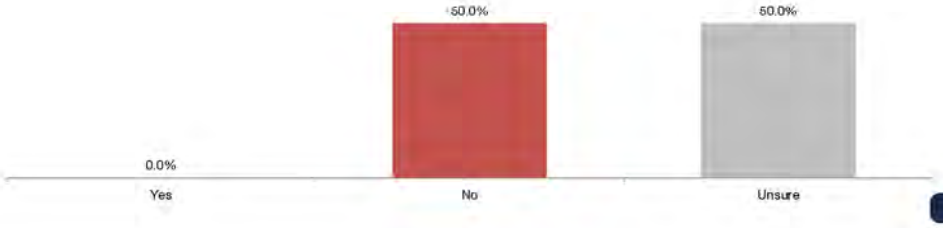
Question 7: Do office building **re-use limitations** present an obstacle to developing a shelter in San Clemente within the areas identified for shelter locations?



Half of respondents are unsure if the City's ordinance is an obstacle to developing a shelter

Question 8: Are there any obstacles to developing a shelter in San Clemente created by the Emergency Overlay Zone and the development standards in the City's Ordinance?



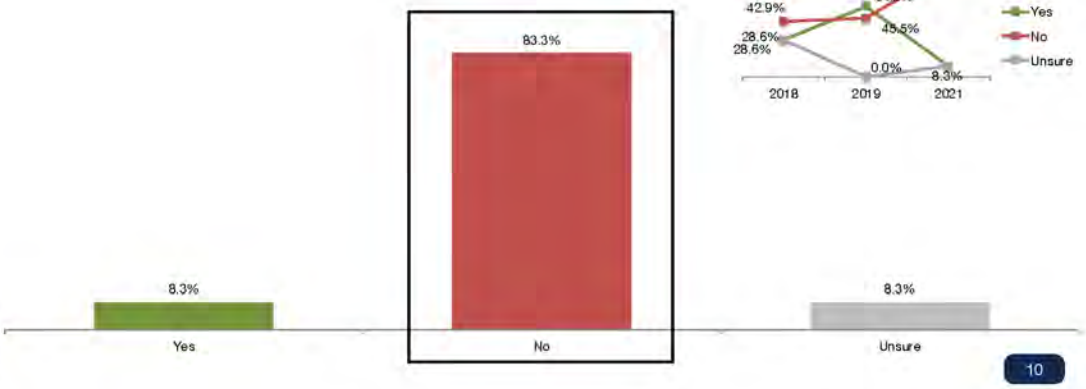


PROBOLSKY RESEARCH

9

83% respondents say barriers are not different in San Clemente compared to other Orange County communities

Question 10: Are the barriers to opening an emergency shelter in San Clemente different from the barriers in other Orange County cities/communities?



PROBOLSKY RESEARCH

10

Differences in opening a shelter in San Clemente

Question 11: Please explain what those differences are.
[AMONG THOSE WHO SAID "YES" TO Q11]

"Too small, need to partner with other cities to get to scale"

"South County in general - transportation if needed to go to central OC, moving from shelter to perm. housing - expensive"

PROBOLSKY RESEARCH

11

A.4 Public Comments

In addition to the comments received during the Community Meetings and Community Survey described above, the City received public comments that focused on the following:

- The City should consider the following sites for affordable housing: Emergency Shelter Coalition owned sites along Avenida Pico and 100 Avenida Presidio (old City Hall).
- Strengthen the inclusionary housing program, specifically to require a 15% affordability requirement.
- Concern about the lack of analysis regarding non-vacant sites.
- Concern about the use of open space sites.
- Update the SB2 Zone to make an emergency shelter more feasible.
- Lack of assessment of fair housing.
- ADU monitoring to ensure affordability.

A.5 Response to Public Comments

Based on the public input received at public meetings and response to the Sites Inventory Survey, the City adjusted its overall strategy for meeting the RHNA by:

- Expanding efforts to facilitate ADU development, recognizing this type of housing as an important resources for affordable housing.
- Removing some candidate sites for rezoning due to location in open space reserve.
- Adjusting the density of some candidate sites for rezoning, considering their proximity to existing residential uses.
- Adding additional information and feasibility analysis for non-vacant rezone sites.

- Removing one of the two rezone sites with the Open Space zoning and reducing the other to only include the commercially zoned portion of the site.
- Reduction in potential units for non-vacant rezone site with existing commercial use.
- Added information about housing and discussions related to maintaining affordability covenants expiring during the 6th cycle.
- Added substantial analysis regarding the Emergency Shelter Overlay, which complies with State law.
- Added discussion regarding financial constraints of the ES Overlay.
- Eliminated designation of "small sites" for lower income households in the residential sites inventory.
- Expanded the discussion of environmental constraints.
- Added explicit community outreach as part to the rezone process in Program 1.
- Expanded description of Program 3.
- Modified timelines and added timelines for Program 3 objectives.
- Modified timeline of Programs 5 and 6.
- Expanded Program 7, including timelines and objectives.
- Expanded Program 15 to include education for property owners and tenants in the Rancho San Clemente Business Park.
- Added additional discussion regarding public engagement.
- Added discussion regarding expansion of the Emergency Shelter Overlay.
- Further expanded discussion of non-vacant site suitability.
- Re-evaluated and modified the RHNA Strategy based on changes to the sites inventory and candidate sites, including elimination of small sites for lower income households.
- Further expanded the discussion of environmental constraints.
- Modified Program 3 to identify that the City does not rely on small sites.
- Updated proposed rezoning to reflect that sites would maintain base zoning and one Housing Overlay (H) would apply (Table 5-1).
- Modified Programs 1, 2A, and 5 to coordinate and create one Housing Overlay (H) to apply to previous and new housing sites, and to make housing development throughout the city clearer, easier, and more streamlined.
- Modified Program 6 to reflect suggested language and include a feasibility study to increase the requirement.
- Expanded Program 15 to include an evaluation of additional areas in the City for emergency shelters.
- Modified the timeline for Program 15 to begin the evaluation earlier.

Appendix B: Review of Past Accomplishments

B.1 Summary of Accomplishments

During the 2013-2021 Housing Element, the City worked diligently to implement the programs outlined in the Housing Plan. Table B-1 provides an overview of the City's accomplishments and also an assessment of each program's continued appropriateness to be included in the 2021-2029 Housing Element.

Table B-1: Review of Past Accomplishments

Program	Objectives	Progress
Goal 1: Provide adequate opportunities for new housing for persons at all economic levels as well as those with special needs.		
Program 1. Provide Adequate Sites and Monitoring for No Net Loss	▪ Monitor and update the sites inventory annually to assess its adequacy for meeting RHNA, particularly for sites capable of facilitating the development of lower income housing. ▪ Make the inventory of vacant and underutilized sites available to interested developers after adoption of the Housing Element. The sites inventory will be posted on the City's website and updated annually. ▪ In 2018, develop marketing and economic development strategies to implement the Centennial General Plan land use goals and affordable housing opportunities for all income levels in mixed use areas. ▪ Should properties identified in the residential sites inventory (such as the Shorecliffs Golf Course) become unavailable during the planning period for housing for lower income households, resulting in a shortfall in sites for meeting the RHNA, within one year, the City will identify additional sites of appropriate size and density and rezone, as necessary, In addition to maintaining adequate sites for the RHNA, the City will explore and rezone additional sites at appropriate density for all household types within two years of Housing Element adoption. ▪ In 2019, evaluate the feasibility of an affordable housing	As of 2019, San Clemente constructed 675 housing units during the planning period leaving a remaining 212 lower and moderate income units per RHNA. In March 2019, the City approved the Shorecliffs Senior Housing development project on the Shorecliffs golf course property identified in the residential sites inventory. The project is subject to the City's Inclusionary Housing Program. A building permit was issued in 2020; therefore the site becomes "unavailable." However, there are remaining adequate sites in the sites inventory with the capacity to meet RHNA for all income categories. The City continues to monitor the residential sites inventory and provide the inventory to interested affordable housing developers on their website. San Clemente began marketing the Vista Hermosa/Avenida La Pata property on the publicly available Multiple Listing Service (MLS) in 2019. As of December 2019, the City had not received a formal offer from a housing provider.

Program	Objectives	Progress
	opportunity on the City-owned site at Vista Hermosa and Avenida La Pata.	*Continued Appropriateness*: This program continues to be appropriate. A modified version is included in the in the 2021-2029 Housing Element to reflect new Regional Housing Needs Assessment (RHNA) and strategy for meeting the RHNA.
Program 2: Lot Consolidation	▪ Facilitate lot consolidation with the goal of achieving at least one small/medium size housing project via the following: o Provide technical assistance regarding the lot consolidation process to interested parties o At least annually and on an ongoing basis, provide the sites inventory to interested developers and assist in identifying sites with lot consolidation potential. o Process lot consolidation application concurrently with other applications for development. o Evaluate the City's lot consolidation activities in 2017 and within one year of the Housing Element adoption, adopt appropriate incentives. Incentives to be considered include, but are not limited to: waiver or subsidy or development fees, reduction in parking standards, allowance for shared parking, and reduction in commercial FARS for projects in mixed use zones. o Re-evaluate the trend of lot consolidation and make modification as necessary to promote housing and mixed-use development on small sites.	In 2018, the City initiated a Lot Consolidation Ordinance, which was adopted in 2021. The ordinance offers a range of incentives for lot consolidation and building at maximum density. The Staff completed one residential lot consolidation in 2017. *Continued Appropriateness*: This program continues to be appropriate and an updated version is included in the in the 2021-2029 Housing Element to identify incentives for lot consolidation.
Program 3: Density Bonus Ordinance	▪ Update Density Bonus Ordinance by the end of 2017 to reflect the requirements of AB 2222 (effective January 2015), including extending the affordability control for the affordable units to 55 years, and required the replacement of existing affordable united demolished or removed in order to qualify for a density bonus, incentive, or concession.	Density Bonus Ordinance amendments reflecting AB 2222 requirements were initiated in 2017 and became effective March 19, 2018. *Continued Appropriateness*: This program continues to be appropriate. A modified version is included in the in the 2021-2029 Housing Element to update the Density Bonus Ordinance for recent changes to State law.

Program	Objectives	Progress
Program 4: Affordable Housing Overlay	▪ Expand the City's affordable housing inventory for lower income households by 150 units (50 extremely low income, 50 very low income, and 50 low income units) between 2014 and 2021 through the following efforts: o Prepare annual analysis of development in Affordable Housing Overlay Zone to evaluate effectiveness of zoning standards. o Continue to implement the requirements of the Affordable Housing Overlay Zone. o Review the requirements of the Affordable Housing Overlay Zone on an annual basis to improve the effectiveness of the Overlay Zone and make amendments as necessary. o Prioritize in-lieu fees for lower income affordable housing projects proposed in the Affordable Housing Overlay.	A total of 93 lower income affordable housing units were constructed during the planning period. The Affordable Housing Overlay was analyzed in the 2017 Housing Element Midterm Update. The overlay has been effective in developing affordable units. The City continues to apply the overlay and seek opportunities to enhance its effectiveness. In 2018, the City changed the Affordable Housing Overlay zoning standards to allow stand-alone residential units and affordable housing on any mixed-use zoned lots in the Housing Element site inventory. There were no proposed affordable housing projects in 2018 or 2019 that would take advantage of the in-lieu fees. *Continued Appropriateness*: This program continues to be appropriate and is included in the in the 2021-2029 Housing Element.
Program 5: Inclusionary Housing Program	▪ Continue implementation of the Inclusionary Housing Program. ▪ Initiate public outreach to advise the development of policy guidance for the uses and method of distributing the in-lieu fee. Criteria for awarding the in-lieu fee will be established, prioritizing funding for the projects that propose affordable housing for lower income families especially those that offer deeper levels of affordability and/or reserve units for persons with special needs. ▪ Develop a new formula for calculation in-lieu fees to establish adequate funding for affordable housing and provide clarity for staff and developers. ▪ Annually evaluate the effectiveness of inclusionary housing program in facilitating the development of all income levels. ▪ Develop incentives for new affordable development partnerships.	In 2017, the City conducted a public survey on how to prioritize the in-lieu fee. The City initiated an in-lieu fee ordinance in 2019 (see Program 5). The City reviewed the in-lieu fee formula in 2021 and determined the current formula is appropriate. *Continued Appropriateness*: This program continues to be appropriate and an updated version is included in the in the 2021-2029 Housing Element.

Program	Objectives	Progress
Program 6: Affordable Housing Development	▪ Encourage and facilitate non-profit led affordable housing development with the goal of creating 150 affordable units for lower income households. The City will implement the following measures: o Contact developers with expertise in special needs housing to discuss affordable housing opportunities annually, o Initiate public outreach to advise and establish criteria for the in-lieu fee or other discretionary housing funds, o Provide letters of support to affordable housing developers' applications for funding, o Monitor Zoning regulations for constraints to the development of housing for persons with special needs, o Develop marketing strategies to implement Centennial General Plan land use goals and affordable housing opportunities. ▪ Provide density bonuses and other incentives to affordable housing developers. ▪ Implement the Affordable Housing Overlay Zone and Inclusionary Housing Program. ▪ Identify and pursue funding sources for affordable housing development, ▪ Meet with non-profit developers and housing organizations to evaluate projects for acquisition and rehabilitation of new shelters and long-term affordable housing.	In 2017, Staff completed a list of affordable housing developers for contact. Staff continues to work with developers and non-profits to explore funding and development opportunities for the construction of affordable housing units or conversion of existing homes to affordable units. The City initiated an in-lieu fee ordinance in 2019 (see Program 5). The City reviewed the in-lieu fee formula in 2021 and determined the current formula is appropriate. Staff continue to provide letters of support for affordable housing developers' applications. The City plans to develop marketing and economic development strategies to implement the Centennial General Plan land use goals. Projects are reviewed according to density bonus regulations. The City continues to implement the Affordable Housing Overlay Zone and Inclusionary Housing Program. Staff consult the HCD website to identify funding sources for affordable housing and meet with housing organizations annually. *Continued Appropriateness*: This program continues to be appropriate and is included in the in the 2021-2029 Housing Element.
Program 7: Second Unit Ordinance	▪ Work to increase second/accessory unites by an average of five units annually via the following: o Confirm the City's second unit ordinance is consistent with State law and amend the ordinance to comply, o Determine whether the City can expand its second unit programs to provide additional low-income units, o Promote second/accessory units and provide technical assistance to interested HOAs.	On March 6, 2019, the City adopted the ADU ordinance in accordance with State law at the time An ordinance to update the ADU zoning standards was initiated again in 2020 to comply with recent changes to State law. As of 2020, 49 ADUs had been issued City permits under the 2017 State ADU law changes.

Program	Objectives	Progress
		Continued Appropriateness: This program continues to be appropriate. An updated version is included in the in the 2021-2029 Housing Element. As required by State law (AB 671), the Housing Element includes the City's plan on incentivizing ADUs.
Program 8: Pursue Funding Sources and Programs	▪ Continue to apply for and administer CDBG grants annually. ▪ Annually evaluate the viability of other grant sources and pursue available funding whenever feasible.	The City continues to seek new funding opportunities and partnerships. The City administered 15 percent of its CDBG grant funds (approximately $50,000 annually to nonprofit organizations, including Family Assistance Ministries (FAM) and Laura's House that serve the homeless and those at risk of becoming homeless. The City also received $310,000 in SB 2 grants and $300,000 in LEAP grants to support planning efforts/initiatives that would facilitate the development of housing. *Continued Appropriateness*: This program continues to be appropriate and is included in the in the 2021-2029 Housing Element.
Program 9: Acquisition and Conversion of Market-Rate Housing to Affordable Housing	▪ Work with a non-profit to purchase a site to be used as transitional housing and/or long-term, permanent housing with the goal of increasing the affordable housing inventory by 50 lower income units by 2021.	The City continues to seek opportunities to work with non-profits to build transitional housing and/or long-term permanent housing. However, the City has not yet identified a viable project. *Continued Appropriateness*: This program continues to be appropriate and is included in the in the 2021-2029 Housing Element.
Goal 2: Reduce energy consumption in residential developments.		

Program	Objectives	Progress
Program 10: Sustainable Policies	▪ Continue to implement the Sustainability Action Plan. ▪ Continue to promote PACE programs on the City website and in brochures.	The City continues to implement the Sustainable Action Plan through the General Plan and promote the PACE program through the City's website. *Continued Appropriateness*: This program continues to be appropriate is included in the in the 2021-2029 Housing Element.
Goal 3: Ensure equal housing opportunity and prevent housing discrimination of protected persons.		
Program 11: Fair Housing	▪ Continue to contract with a qualified agency to provide fair housing services to residents. ▪ Continue to promote available fair housing services to residents. ▪ Participate in at least three fair housing outreach events annually.	The City contracts with the Fair Housing Foundation (FHF) to provide fair housing services to residents. Services include outreach, education, and enforcement for tenants, landlords, and property managers. FHF has provided over 1,000 pieces of fair housing literature in English and Spanish. Public service announcements were aired on the City's cable station. *Continued Appropriateness*: This program continues to be appropriate. A modified version is included in the in the 2021-2029 Housing Element. Specifically, new State law (AB 686) requires that the Housing Element incorporates actions to address the impediments to fair housing identified in the Orange County Regional Analysis of Impediments to Fair Housing Choice.
Program 12: Social Services Grant Program	▪ Continue to provide grant applications for housing funds annually. ▪ Provide assistance to approximately 2,000 homeless persons and persons with special needs, including seniors and disabled persons, on an annual basis.	The City's General Fund supports grants related to housing, homelessness, health, and youth. The City has awarded Family Assistance Ministries (FAM), $8,100 from CDBG grants, and $22,000 from the City's General Fund to support FAM's housing and supportive service for households at risk of homelessness and for those that are homeless. It is estimated that FAM has assisted over 80,000 individuals in 2018 and 2019. According to

Program	Objectives	Progress
		the FAM Executive Director, persons assisted range from homeless, nearly homeless, very low and low income levels, and includes a variety of special needs groups including but not limited to seniors and the disabled. *Continued Appropriateness*: This program continues to be appropriate is included in the in the 2021-2029 Housing Element.
Program 13: Zoning Ordinance Monitoring	▪ Continue to monitor the Emergency Shelter Overlay. ▪ Initiate the following amendments to the Zoning Ordinance: o Transitional and Supportive Housing: To regulate transitional and supportive housing as a residential use subject to the same standards as similar uses in the same zones o Farmworker and Employee Housing: Housing for six or fewer employees will be treated as a regular residential use. Housing for agricultural workers is treated as an agricultural use and permitted where agricultural uses are permitted (California Employee Housing Act). o Density Bonus: To address the affordability and replacement requirements consistent with AB 2222. ▪ Consider the following amendments to the Zoning Ordinance: o Residential Care Facilities: To address the provision of small residential care facilities consistent with the Lanterman Act and larger residential care facilities in accordance with applicable State laws. o Conditional Use Permit for Multifamily: Modify the Conditional Use Permit Findings for multi-family housing to ensure the required Findings are objective and comply with zoning requirements and public health and safety. ▪ Monitor the Zoning Ordinance for potential housing development constraints.	The City continues to monitor the Emergency Shelter Overlay (see Program 14). Zoning amendments were initiated, approved, and became effective in June 2018. The City continues to monitor the Zoning Ordinance and process amendments as needed to ensure regulations are consistent with State law. In February 2019, the City conducted a survey of shelter providers in the region to identify impediments to shelter development within the ES Overlay. The survey found that Shelter Operators would not allow homeless persons from other cities to utilize available beds. San Clemente is in the process of collaborating with neighboring cities to apply for State grants and other resources in order to address the needs of the unsheltered. The survey also found that there was a general lack of interest from the County and other private entities to develop a shelter in the ES Overlay. They concluded that the lack of interest was not a result of impediments that fall within the scope of factors outlined in Program 14. *Continued Appropriateness*: This program continues to be appropriate. A modified version is included in the in the 2021-2029 Housing Element. Specifically, the Housing Element outlines various zoning amendments

Program	Objectives	Progress
		necessary to comply with new State laws – AB 101 (Low Barrier Navigation Centers); AB 139 (Emergency and Transitional Housing); AB 2162 (Supportive Housing).
Program 14: Monitoring of Emergency Shelter Overlay	▪ Evaluate the rideshare program and pursue options to enhance transit accessibility. ▪ Work with social services providers and shelter proponents to determine if the rideshare is a feasible transportation option or secure other alternatives while avoiding burden and costs on the applicants. ▪ Assess and update the City's unmet homeless shelter needs every two years and as emergency shelters are proposed. Unmet homeless shelter needs will be updated when: o The Biannual Homeless Census is available, o Emergency shelters will be allowed without discretionary action until the need is met, o Significant changes in the housing market that would impacts homeless shelter needs occur, o There are significant changes to the City's homeless strategy. ▪ Conduct a survey of shelters in the region to identify impediments to shelter development every two years if no emergency shelter is proposed in the ES Overlay. If impediments are identified, the City will make the necessary modifications to the emergency shelter ordinance or Housing Element.	The City officially launched its rideshare program on April 3, 2018. The City sent the HCD a rideshare progress letter in 2018 and continues to monitor the effectiveness of the program. After an extensive marketing campaign within the Lyft outreach program at the end of 2018 and beginning of 2019, the program ridership appears to still be growing, increasing from roughly 5,000 riders per month to 6,000 per month by the end of 2019. The City has continued to work with OCTA to improve the program and increase access to the services. On top of establishing a toll free phone number (1-844-440-4672) for riders who need ADA accessible ride services, OCTA agreed to fund ADA ride services 100 percent for this program. The City also expanded the eligible service area around each bus stop from a 0.1 mile to 0.25 mile radius. Through the OCTA grant, the City already covers a majority of the costs for program users. However, those that may not have the ability to pay the base program fare may be able to receive direct ride assistance from either the City through their Lyft account, or from a local nonprofit. In January 2019, the Orange County Continuum of Care conducted a Point In Time Count and Survey which found that there are 96 unsheltered homeless and 49 sheltered in the City of San Clemente. In May 2019, the City designated a campsite for the homeless to provide for the needs of unsheltered individuals. Due to the significantly reduced homeless population in San

Program	Objectives	Progress
		Clemente by the end of 2019, the City chose to close the designated campsite in December of 2019. In addition, the City is monitoring for the release of the 2021 Point In Time Count and Survey. In August 2019, the City considered a lease proposal for a shelter in the City's SB2 Overlay area. The proposal illustrates that there is interest in establishing a shelter in the existing SB2 Overlay area. In April 2021, the City completed the two-year shelter impediment survey. The survey found that while the City's emergency shelter development standards are not an impediment, the cost to operate an emergency shelter is an impediment. The City is in the process of collaborating with neighboring cities to apply for State grants and other resources to address unsheltered needs. City staff and elected officials are meeting with nearby cities and the County to find a solution to meet the needs of the region's unsheltered population. *Continued Appropriateness*: This program continues to be appropriate. A modified version is included in the in the 2021-2029 Housing Element.
Goal 4: Ensure that existing housing units, especially affordable units, shelters and properties owned by lower income residents are maintained and, where necessary, rehabilitated so that this valuable resource is preserved.		
Program 15: Neighborhood Revitalization Program	▪ Continue to implement and advertise the Neighborhood Revitalization Program. ▪ Provide 40 loans through the Home Rehabilitation Program during the Housing Element planning period. ▪ Complete one rehabilitation project in the Shorecliffs Mobile Home Park annually.	The City continues to provide CDBG grants for housing rehabilitation to improve neighborhoods and advertises the availability of the Neighborhood Revitalization Program to continue implementation, such as publication in City magazines, advertisement on local channel, Facebook blasts, press release, and direct

Program	Objectives	Progress
	▪ Partner with various agencies to organize community events in the Neighborhood Pride area annually.	mailing. Since 2014, the City has provided 23 loans through the Home Rehabilitation Program. Although the City did direct marketing to the Shorecliff Mobile Home Park in 2017, as of 2019, no residents applied for the program. The City continues to offer the program to the community. *Continued Appropriateness*: This program continues to be appropriate and an updated version is included in the in the 2021-2029 Housing Element.
Program 16: Preserve At-Risk Housing	▪ Monitor status of affordable units annually by maintaining contact with property owners and HUD Multi-Family Housing division. ▪ Solicit interest and participation of non-profit housing developers to acquire and preserve housing to be maintained as affordable units.	Staff maintains a contact list to monitor status of affordable units with property managers. Staff also evaluated units at risk of converting to market rate housing, and none of the affordable housing units are at risk within the 10-year planning period (2013-2023). *Continued Appropriateness*: This program continues to be appropriate and is included in the in the 2021-2029 Housing Element.
Program 17: Preserve Affordability of Existing Housing Stock	▪ Study options for the retention of affordable housing, especially containing and managing vacation rentals in the community.	The City requires proposals to demolish or convert residential units into condominiums in the Coastal Zone, per California Government Code Section 65588 ("Mello Act"). For vacation rentals, in 2017 the City adopted an ordinance that limits vacation rentals, known as Short Term Lodging Units (STLUs) or Short Term Apartment Rentals (STARs), to specific zones of the City and applies a cap based on the ratio of vacation rentals to the number of housing units. This restricts the use to retain the supply of housing units, including affordable housing. For ADUs, the City prohibits use of ADUs as vacation rentals as part of the review process. The State

Program	Objectives	Progress
		passed a similar law in 2019 to prohibit ADUs to be used as short-term rentals. *Continued Appropriateness*: This program continues to be appropriate. A modified version is included in the in the 2021-2029 Housing Element.

Progress Toward RHNA (2019)

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA	134	95	108	244	581
Units Constructed	65	28	32	550	675
Remaining	69	67	76	0	212
% Completed	49%	30%	30%	Over 100%	64%

B.1.1 Effectiveness in Addressing Special Needs

During the 2013-2021 Housing Element planning period, the City facilitated the development of the Shorecliff Senior Housing project. In addition, the City utilized CDBG funds to support Family Assistance Ministries and Laura's House that provide emergency and transitional housing for the homeless and at-risk homeless. The City also used General Fund to leverage the Lyft rideshare that provide subsidized rides along the two previous bus routes. Specifically, the City expanded the geographic coverage of the program to 0.25 mile from the route. FAM had previously reported successful use of this program to serve its clients. In May 2019, the City also designated a campsite for the homeless to provide for the needs of unsheltered individuals. The campsite ran from May 2019 through December 2019. While the City also housing rehabilitation assistance to mobilehome owners (who are primarily seniors), few took advantage of the program.

Appendix C: Affirmatively Furthering Fair Housing

C.1 Introduction and Overview of AB 686

Introduction and Overview of AB 686

In 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined "affirmatively further fair housing" to mean "taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

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

Analysis of the fair housing issues in this section summarizes analysis and conclusions from the 2020 Orange County Analysis of Impediments to Fair Housing Choice (AI), and supplements with additional data as available and appropriate.

C.2 Assessment of Fair Housing Issues

C.2.1 Fair Housing Enforcement and Outreach

As included in the 2020-2024 Orange County Analysis of Impediments to Fair Housing Choice (2020 AI), the federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA), including FEHA Regulations, protects residents from discrimination on the basis of race, color, religion, national origin, sex/gender, handicap/disability, familial status, marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination. The City also has committed to complying with the following laws related to fair housing:

- *Unruh Civil Rights Act* – Protects residents from discrimination by all business establishments in California, including housing and accommodations.
- *Ralph Civil Rights Act (California Civil Code Section 51.7)* – forbids acts of violence or threats of violence on the basis of race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute.
- *Bane Civil Rights Act (California Civil Code Section 52.1)* – protects residents from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing.
- *California Civil Code Section 1940.3* – prohibits landlords from questioning potential residents about their immigration or citizenship status.

- *Government Code Sections 11135, 65008, and 65580-65589.8* – prohibit discrimination in programs funded by the State and in any land use decisions. Recent additions related to housing for special needs groups include: Housing for persons with disabilities (SB 520); Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2); Housing for extremely low-income households, including single-room occupancy units (AB 2634); Housing for persons with developmental disabilities (SB 812).

The Fair Housing Foundation (FHF) provides fair housing services to guarantee equal housing opportunity to San Clemente residents. Annually, the FHF provides the following fair housing related services:

- Workshops and trainings for tenants, landlords, and property managers
- Fair housing counseling and dispute mediation
- Fair housing literature in both English and Spanish
- Housing program promotion
- Real estate and rental practice discrimination audits
- Tenant-Landlord mediation
- Legal services and advocacy
- Enforcement of fair housing laws through conciliation, litigation, or administration referrals

In San Clemente, FHF held 4 property management trainings, 4 landlord trainings, 3 tenant workshops, and 4 walk-in clinics, and participated in 11 community events from 2015 to 2020. FHF also conducted 3 landlord and 3 certified property managers trainings. The City participates in quarterly Orange County Housing Authority (OCHA) Housing Advisory Committee Meetings for information regarding housing choice voucher (HCV) availability, procedures and policies and regional housing issues.

Between July 2015 and January 2020, FHF served 261 San Clemente households. The FHF maintains a record of all housing discrimination complaints filed in San Clemente. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status, and retaliation. According to the 2020 AI, the FHF received five housing discrimination inquiries between 2015 and 2020 from San Clemente residents. Of the five inquiries, four were related to disability discrimination and one was related to marital status.

For FY 2020 (ending June 30, 2021), FHF served 30 San Clemente residents with fair housing services. Due to the current COVID-19 pandemic, FHF reached out to the San Clemente community in different ways. FHF offers Virtual Fair Housing Workshops in English every Tuesday and Virtual Fair Housing Workshops in Spanish every Thursday. Also, FHF offers Virtual Walk-in Clinics every Wednesday throughout the month. Residents can call its Outreach Coordinator and schedule a 30-minute session with one of the Housing Counselors. The workshops and clinics allow residents to have their questions answered and learn about housing, safely from the comfort of their home. The Community Engagement Liaison conducted Virtual Fair Housing Workshops for the City of San Clemente on August 4, 2020, and February 16, 2021. Other outreach and education activities included:

- 8/13/20 - Case Analyst attended the IAOHRA Fair Housing Matters webinar
- 9/21/20 - Analyst attended the Hearing on Hate in California for the Fair Employment and Housing Council
- 7/14/20 - Executive Director went on Congresswoman Linda Sanchez Facebook live event on housing rights for California's 53rd District
- 9/10/2020 - Housing Counselor attended the NeighborWorks webinar

The Project Specialist distributed quarterly newsletters to the email correspondents. On Facebook, FHF had a combined 3,889 Posts Reach, Instagram had 3,878 Impressions and 353 Engagements, Twitter had 7,669 Tweet Impressions, and the FHF website had 4,927 sessions from July to September.

Figure C-1 shows the HUD Office of Fair Housing and Equal Opportunity (FHEO) inquiries from 2013-2021, and renter households receiving housing choice vouchers (HCVs). There are no public housing buildings in the City of San Clemente. Overall, there were less than 0.5 inquiries per 1,000 people in San Clemente. Between 2013 and 2021, HUD recorded 19 FHEO inquiries from San Clemente residents; three related to disability, one related to race, two related to familial status, one related to sex, and 12 that were not related to a specific discrimination category (disability, race, familial status, national origin, religion, sex, or color). Of the 19 inquiries, 13 failed to respond, two were found to have no valid basis, two were found to have no valid issue, and one was not timely filed.

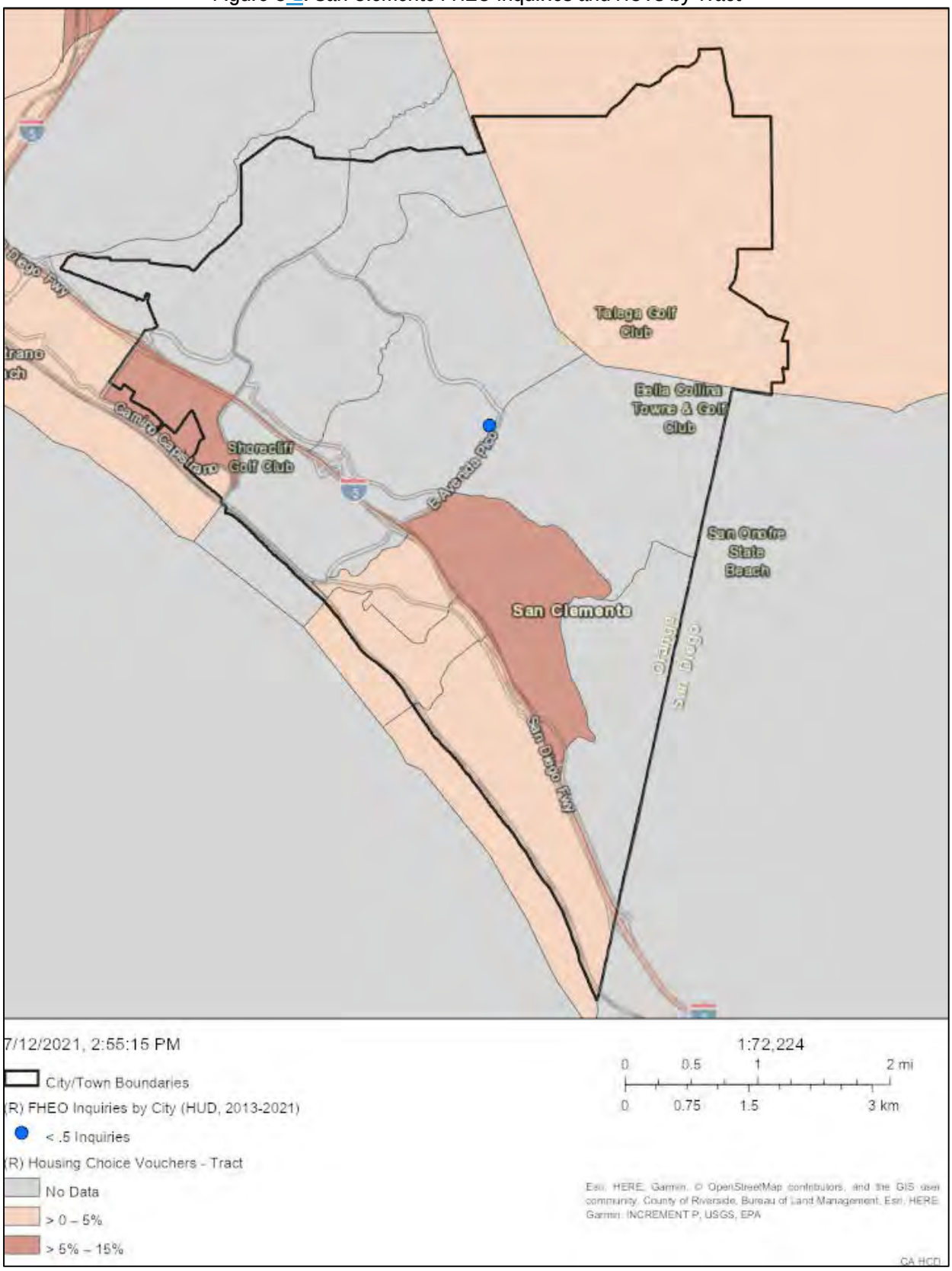
Up to 5% of renters in five San Clemente tracts received HCVs, and 5 to 15% of renters in two San Clemente tracts received HCVs. To protect the confidentiality of those receiving Housing Choice Voucher Program assistance, tracts containing 10 or fewer voucher holders have been omitted from this data set. The City receives up-to-date information about HCVs by attending quarterly OCHA Housing Advisory Committee Meetings. Table C-1 shows that in San Clemente, a total of 72 units are supported through project-based Section 8 Program and 130 units are supported through the HCV Program.

Table C-1: Publicly Supported Housing Units by Program Category

Housing Units	Total	Percent
San Clemente		
Total Housing Units	25,556	--
Project-Based Section 8	72	0.78%
HCV Program	130	0.51%
Orange County		
Total Housing Units	1,048,907	--
Project-Based Section 8	4,121	0.39%
Other Multi-Family	104	0.01%
HCV Program	22,958	2.19%

Source: HUD AFFH-T Data Documentation, July 2020.

Figure C-1: San Clemente FHEO Inquiries and HCVs by Tract



Source: HCD Data Viewer, HUD 2013-2021 Data, 2021.

C.2.2 Integration and Segregation

Race and Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility.

Dissimilarity indices can be used to measure the evenness of distribution between two groups in an area. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

The following racial/ethnic minority segregation analysis also includes racial/ethnic minority population trends, maps of minority concentrated areas over time, and an analysis of the City's sites inventory as it relates to racially/ethnically concentrated areas.

Regional Trend

As presented in Table C-2, in Orange County, racial/ethnic minority groups make up 59.4% of the population. White residents make up approximately 40.6% of the population, while Hispanic/Latino and Asian residents make up 34.1% and 20.3%, respectively. San Clemente and other jurisdictions in the vicinity of the City have lower racial/ethnic minority populations compared to the County. Of the selected jurisdictions, San Clemente has the smallest racial/ethnic minority population of 25.3% and San Juan Capistrano has the largest of 44.4%.

As discussed previously, HUD's dissimilarity indices can be used to estimate segregation levels over time. Dissimilarity indices for Orange County are shown in Table C-3. Dissimilarity indices between non-White and White groups indicates that the County has become increasingly segregated since 1990. Segregation has increased most between Hispanics and Whites since 1990. According to HUD, segregation between White and all non-White groups, including Black, Hispanic, and Asian/Pacific Islander, is considered moderate.

As shown in Figure C-2, block groups in south Orange County coastal cities, including San Clemente, Laguna Beach, and Newport Beach, have smaller concentrations of racial/ethnic minorities. Block groups with large racial/ethnic minority populations are most concentrated in northern County jurisdictions such as Anaheim, Garden Grove, and Santa Ana.

Table C-2: Racial Composition in Neighboring Cities and Orange County

	Orange County	San Clemente	Dana Point	Laguna Niguel	Mission Viejo	San Juan Capistrano
White alone	40.6%	74.7%	74.1%	66.6%	65.1%	55.6%
Hispanic/Latino	34.1%	16.4%	17.6%	16.4%	17.7%	38.7%
Black/African American	1.6%	0.8%	1.4%	1.2%	1.1%	0.4%
American Indian/Alaska Native	0.2%	0.3%	0.1%	0.0%	0.1%	0.3%
Asian	20.3%	4.2%	3.6%	10.2%	11.7%	2.4%
Hawaiian/Pacific Islander	0.3%	0.1%	0.1%	0.3%	0.1%	0.1%

Other	0.2%	0.2%	0.2%	0.8%	0.2%	0.0%
Two or more races	2.8%	3.3%	2.9%	4.6%	4.0%	2.6%
Racial/Ethnic Minority (non-White)	59.4%	25.3%	25.9%	33.4%	34.9%	44.4%

Source: 2015-2019 ACS (5-Year Estimates).

Table C-3: Orange County Dissimilarity Indices

	1990 Trend	2000 Trend	2010 Trend	Current
Orange County				
Non-White/White	30.4	34.7	33.6	44.7
Black/White	32.6	33.6	32.3	47.0
Hispanic/White	36.1	41.1	38.2	52.8
Asian or Pacific Islander/White	32.6	34.3	34.8	43.2

Source: Orange County 2020-2024 Analysis of Impediments to Fair Housing Choice, 2020.

Local Trend

Table C-4 shows the change in race/ethnicity composition in San Clemente from 2010 to 2019. The White population has decreased slightly since 2010, while the Hispanic/Latino, Asian, and Black/African American populations have seen marginal growth. Since 2010, the racial/ethnic composition in San Clemente has remained relatively constant.

San Clemente showed a significantly lower extent of segregation in comparison to Orange County as a whole (Table C-5). The City has seen an increase in segregation between Black and White and Asian or Pacific Islander and White communities. However, dissimilarity between non-White and White communities has generally decreased since 1990. Segregation is lower in San Clemente for all racial/ethnic groups compared to the County as a whole. According to HUD, segregation between White and all non-White groups, including Black, Hispanic, and Asian/Pacific Islander, is considered low.

Table C-4: Change in Race/Ethnicity Composition (2006-2019)

Race/Ethnicity	2010	2019
White alone	76.5%	74.7%
Black/African American	0.6%	0.8%
Amer. Indian/Alaska Native	0.5%	0.3%
Asian	3.8%	4.2%
Native Hawaiian/Pac. Isldr.	0.1%	0.1%
Other	1.4%	0.2%
Two or more races	2.6%	3.3%
Hispanic/Latino	14.5%	16.4%

Source: 2006-2010 and 2015-2019 ACS (5-Year Estimates).

Table C-5: San Clemente Dissimilarity Index

	1990 Trend	2000 Trend	2010 Trend	Current
San Clemente				
Non-White/White	21.9	25.9	16.8	17.2
Black/White	13.9	19.1	14.9	37.5
Hispanic/White	27.2	32.9	23.7	22.0

Asian or Pacific Islander/White	14.7	14.8	16.6	27.3

Source: Orange County 2020-2024 Analysis of Impediments to Fair Housing Choice, 2020.

Isolation and exposure indices can also be used to measure segregation in a given jurisdiction or area. As part of the 2020 Orange County AI, isolation and exposure indices were calculated for Orange County jurisdictions including San Clemente. When used together, these indices can show neighborhood demographics experienced by particular racial or ethnic groups. As defined by the 2020 AI, the isolation index returns values from 0 to 100 and "measures what percentage of the census tract in which a person of a certain racial identity lives is comprised of other persons of that same racial/ethnic group." Exposure indices, also valued from 0 to 100, measure a single racial or ethnic groups exposure to all other racial or ethnic groups. Larger values indicate that an average group member lives in a tract with a higher percentage of people from another group.

Isolation indices for White residents are significantly higher than Black, Hispanic, and Asian residents in San Clemente (Table C-6). According to the 2020 Regional AI, in Orange County, White residents have an isolation index of 55.2, Black residents 3.3, Hispanic residents 52.8, and Asian residents 31.8. White residents in San Clemente have a significantly higher isolation index value of 75.5, while Black, Hispanic, and Asian residents have significantly lower isolation indices compared to the County (1.6, 23.4, and 6.2, respectively). The exceptionally high isolation value for White residents in San Clemente can be attributed to the large White population Citywide; 75% of the population in San Clemente is White compared to only 41% in the County. Since 1980, isolation values for White populations in San Clemente have gone down, indicating they are increasingly less isolated. Conversely, isolation values for Black, Hispanic, and Asian populations have increased during the same period. Isolation index trends in San Clemente reflect the overall increase in non-White populations Citywide.

According to the 2020 Regional AI, exposure to White residents (by Black, Hispanic, and Asian residents) is exceptionally high in San Clemente compared to other Orange County jurisdictions. Since 1980, exposure to White residents by non-White residents has decreased. Exposure to Black residents has remained the same or decreased in 1980, while exposure to Hispanic and Asian residents has increased for all other racial/ethnic groups. Black, Asian, and Hispanic populations in San Clemente have all grown marginally in the last decade.

Table C-6: San Clemente Isolation and Exposure Indices

	1980	1990	2000	2010	2020
Isolation Index					
White/White	88.4	84.5	80.4	77.1	75.5
Black/Black	1.2	0.7	1.0	1.0	1.6
Hispanic/Hispanic	10.0	19.3	25.8	22.4	23.4
Asian/Asian	1.7	2.9	4.1	6.1	6.2
Exposure Index					
Black/White	85.5	82.3	75.9	75.3	76.4
Hispanic/White	86.0	77.1	68.6	70.8	69.0
Asian/White	87.1	83.6	79.3	76.4	74.1
White/Black	0.8	0.6	0.8	0.9	0.8
Hispanic/Black	1.1	0.6	1.0	0.9	0.6
Asian/Black	1.0	0.6	0.9	1.0	0.8
White/Hispanic	8.2	11.9	13.9	15.7	15.9
Black/Hispanic	10.4	13.8	18.2	17.0	14.8

Asian/Hispanic	9.0	12.4	14.5	15.5	15.0
White/Asian	1.5	2.6	3.7	5.4	4.3
Black/Asian	1.6	2.8	3.8	5.7	4.5
Hispanic/Asian	1.6	2.5	3.3	4.9	3.8

Source: Orange County 2020-2024 Analysis of Impediments to Fair Housing Choice, 2020.

Figure C-3 and Figure C-4 compare racial/ethnic minority concentrations in 2010 and 2018. An important note on the mapping of racial/ethnic concentrations is that concentration is defined by the proportion of a racial/ethnic group in the total population of a census block group. If a block group has low population, the proportion of a racial/ethnic group may appear high even though the number of residents in that group may be limited. In most San Clemente block groups, there has been an increase in racial/ethnic minority populations, representing less than 20% in 2010 to 21% to 40% in 2018. Four block groups in the central western section of the City and one block group in the northwestern corner have racial/ethnic minority concentrations between 41% and 60%, the highest in the City.

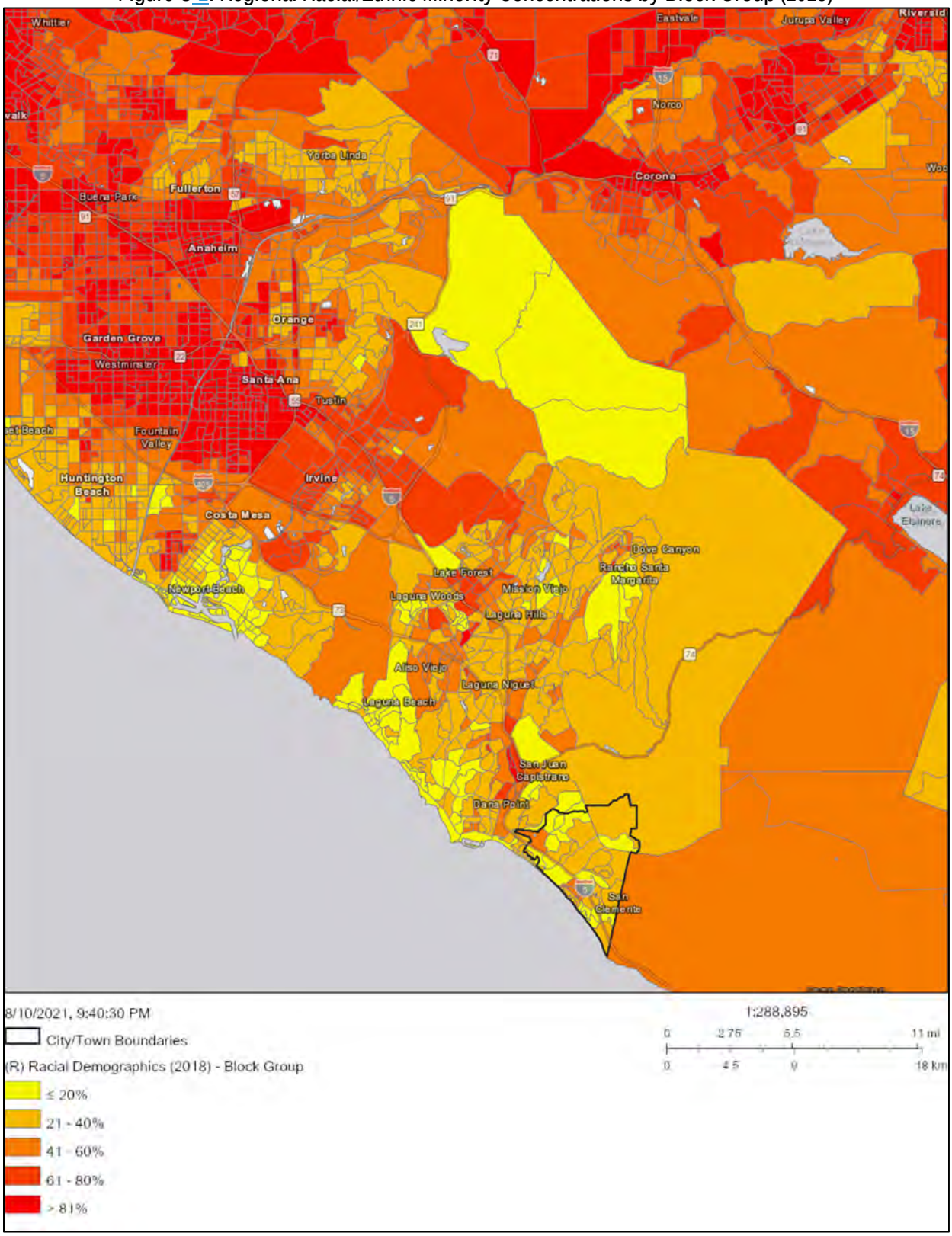
Sites Inventory

Figure C-4 also shows the City's sites inventory used to meet the 2021-2029 Regional Housing Needs Assessment (RHNA). RHNA sites are generally concentrated along Interstate 5, Avenida Pico, and Avenida Vista Hermosa. As shown in Table C-7, nearly half (49.3%) of lower income RHNA units are in block groups where racial/ethnic minorities account for 41-60% of the total population, compared to only 26.5% of moderate income units and 34.9% of above moderate RHNA units. A majority of moderate (67.1%) and above moderate (58.9%) income RHNA units are located in block groups where only 21-40% of the population belongs to a racial/ethnic minority group. There is a significantly higher concentration of lower income units in block groups with small non-White populations below 20%; 38.8% of lower income units are in block groups with racial/ethnic minority populations in this range compared to only 6.4% of moderate income and 6.3% of above moderate income units.

Table C-7: Distribution of RHNA Units by Racial/Ethnic Minority Population

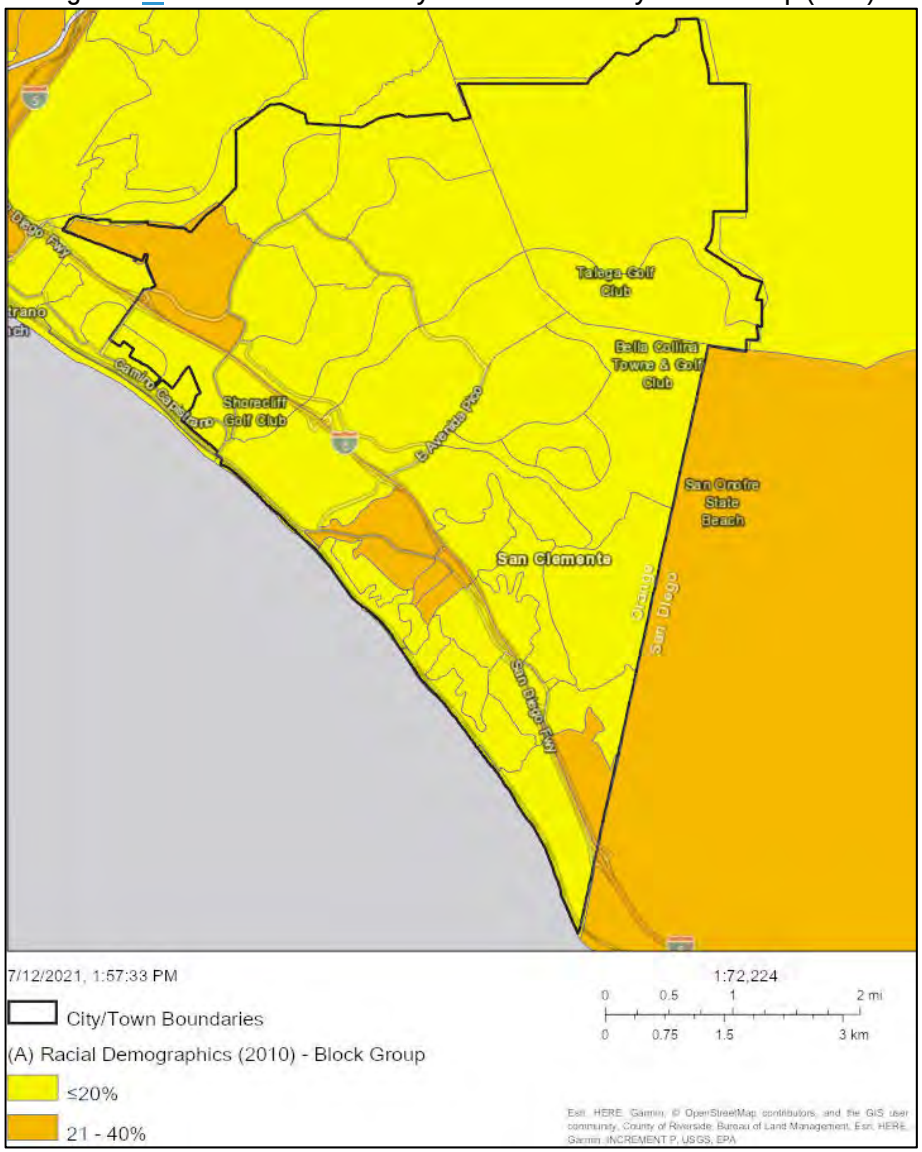
Racial/Ethnic Minority Population (Block Group)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
<20%	293	38.8%	24	6.4%	72	6.3%	359	19.9%
21-40%	90	11.9%	251	67.1%	395	58.9%	736	40.9%
41-60%	373	49.3%	99	26.5%	234	34.9%	706	39.2%
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Figure C-2: Regional Racial/Ethnic Minority Concentrations by Block Group (2018)



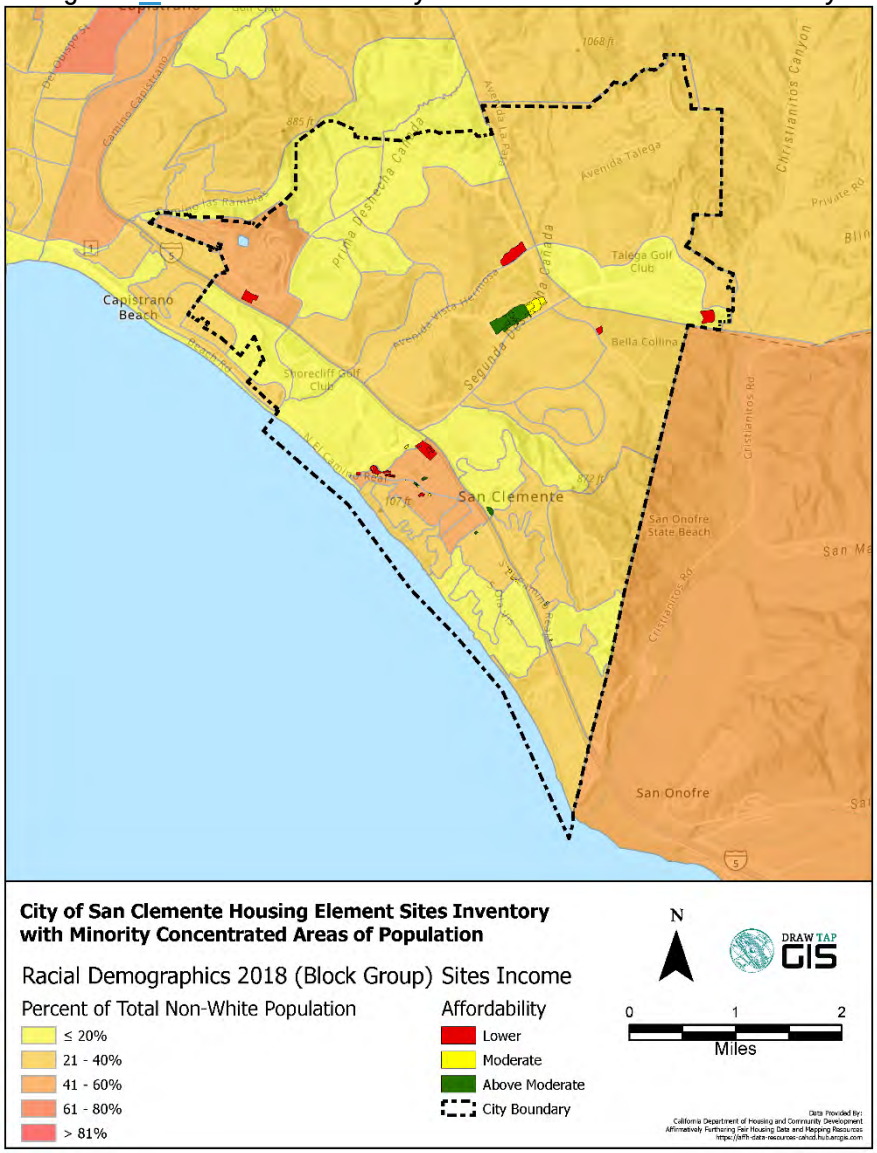
Source: HUD AFFH Data Viewer (2018), 2021.

Figure C-3: Racial/Ethnic Minority Concentrations by Block Group (2010)



Source: HCD AFFH Data Viewer (2010), 2021.

Figure C-4: Racial/Ethnic Minority Concentrations and Sites Inventory



Source: HCD AFFH Data Viewer (2018), 2021.

Disability

Persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability.

Regional Trend

According to the 2015-2019 ACS, 8.5% of Orange County residents experience a disability. San Clemente has a smaller population of residents with disabilities, making up only 7.6% of the population compared to 9.6% in Dana Point, 8% in Laguna Niguel, 10% in Mission Viejo, and 11.2% in San Juan Capistrano. The most common disabilities in the County are ambulatory difficulties (4.5% with a disability) and independent living difficulties (4.3% with a disability).

As shown in Figure C-5, most jurisdictions in the southern County areas have concentrations of persons with disabilities similar to San Clemente. Tracts with disabled populations exceeding 20% are in the Laguna Woods, Anaheim, and Seal Beach areas.

Local Trend

According to the 2015-2019 ACS, approximately 7.6% of San Clemente residents experience a disability, compared to 8.5% Countywide. Disabilities are most common amongst elderly residents; approximately 25% of persons aged 65 and over experience a disability, including 40.2% of residents aged 75 and older. The most common disabilities in San Clemente are ambulatory difficulties (3.8%) and independent living difficulties (3.6%). The population of persons with disabilities has declined from 7.8% during the 2009-2013 ACS.

Figure C-6 and Figure C-7 compare the population of persons with disabilities by census tract using the 2010-2014 and 2015-2019 ACS. In all but three tracts, the disabled population has stayed the same or gone down to less than 10% of the total tract population. Tracts where the population of persons with disabilities accounts for between 10% and 20% of the population are located along the northwestern City boundary and in the central southern areas of the City.

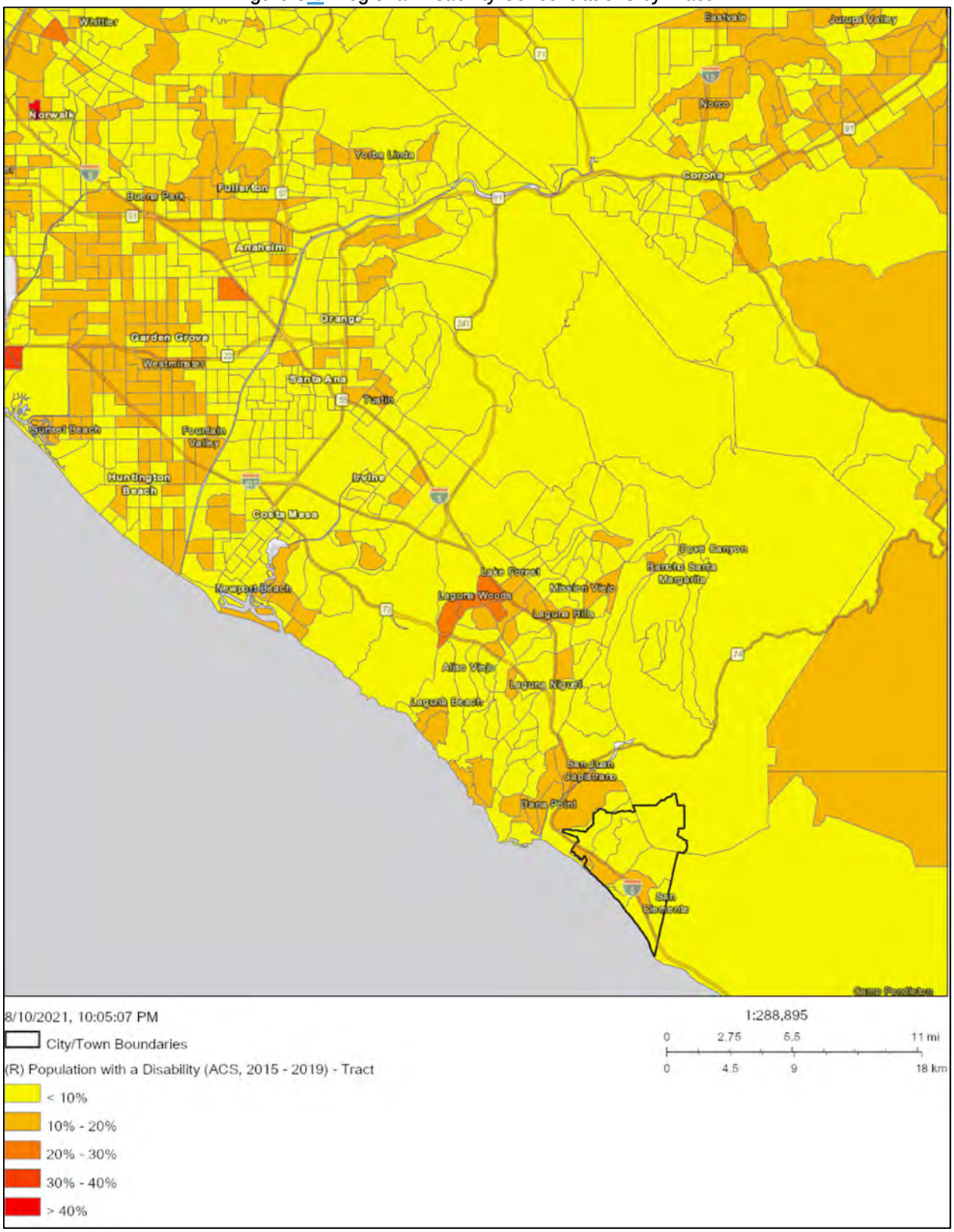
Sites Inventory

Figure C-7 also shows the sites inventory used to meet the City's 2021-2029 RHNA. Most sites are located in tracts where the disabled population is below 10%. As shown in Table C-8, approximately 93% of all RHNA units, including 97.1% of lower income RHNA units, 86.4% of moderate income units, and 92.5% of above moderate income units, are in tracts with a disabled population below 10%. There are more moderate and above moderate income units in areas with populations of persons experiencing disabilities exceeding 10% (13.6% and 7.5%, respectively), compared to lower income units (2.9% of units).

Table C-8: Distribution of RHNA Units by Disability Concentration

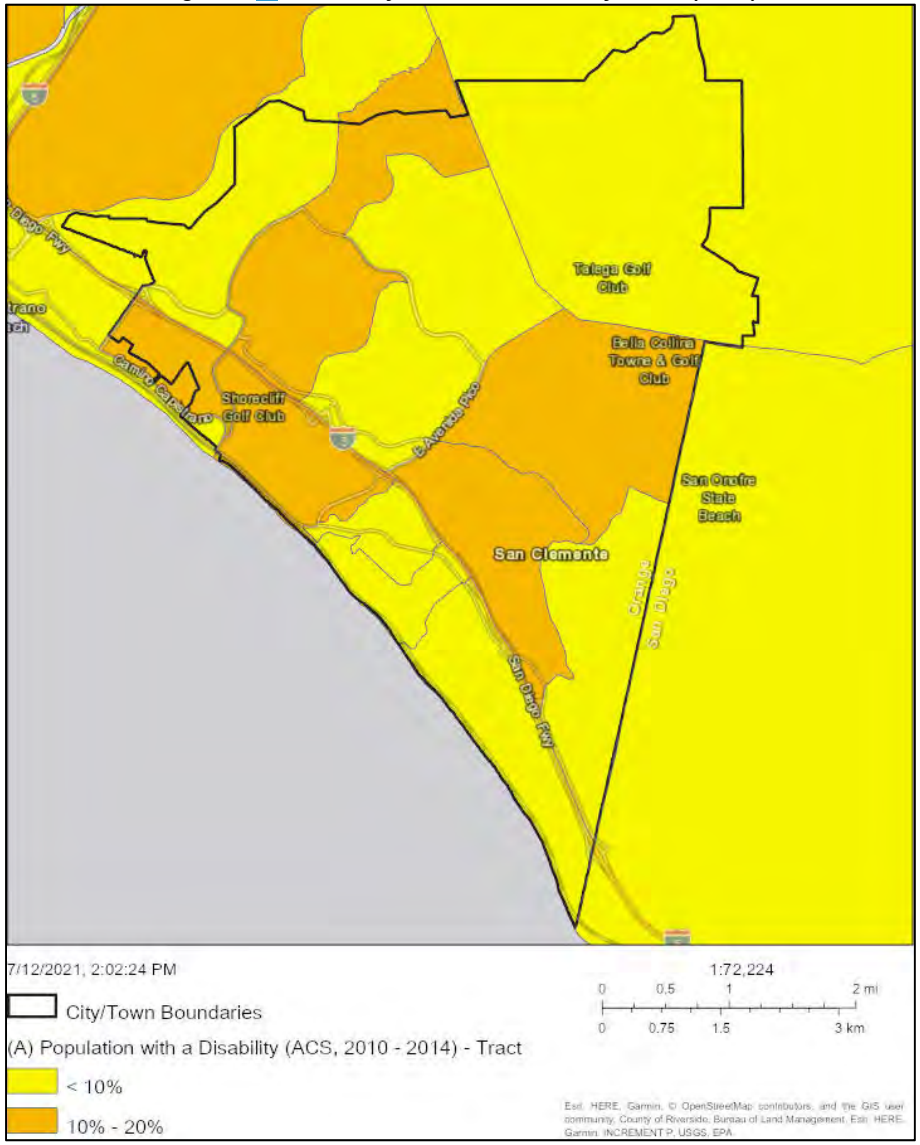
Disabled Population (Census Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
<10%	734	97.1%	323	86.4%	621	92.5%	1,678	93.2%
10-20%	22	2.9%	51	13.6%	50	7.5%	123	6.8%
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Figure C-5: Regional Disability Concentrations by Tract



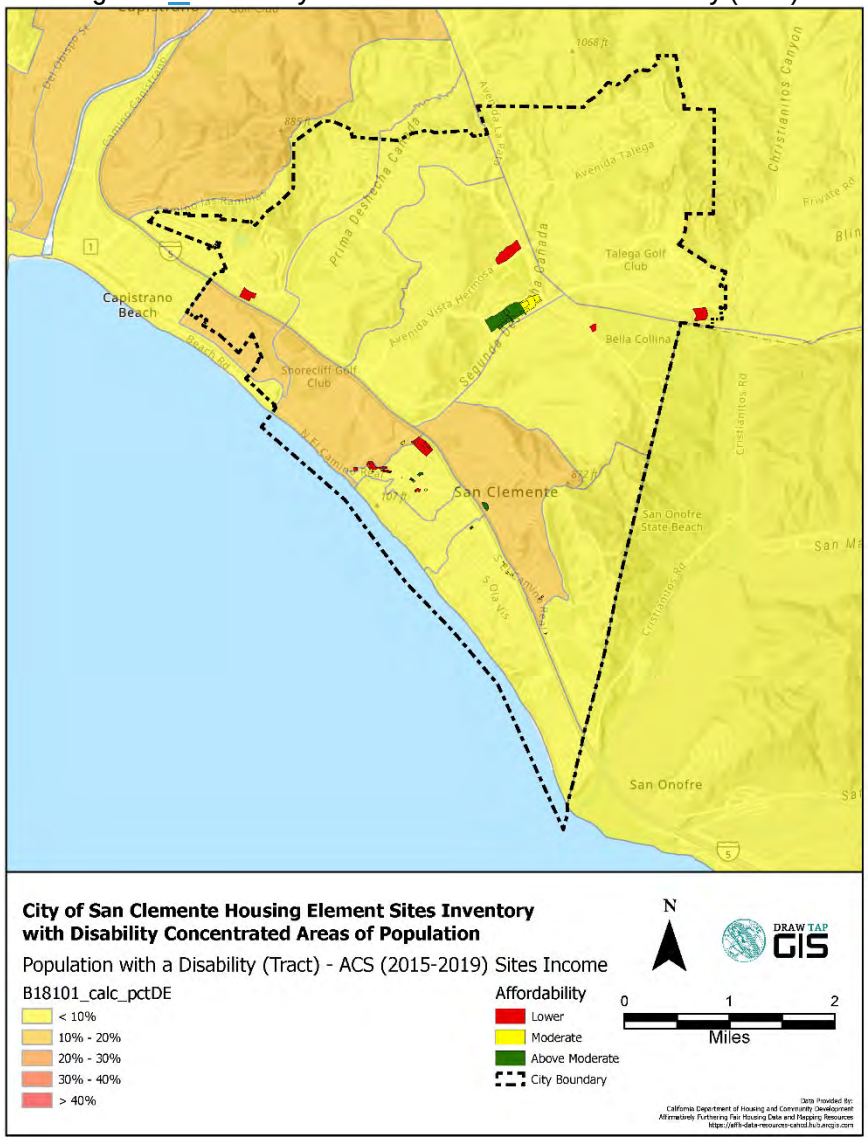
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure C-6: Disability Concentrations by Tract (2014)



Source: HCD AFFH Data Viewer (2010-2014 ACS), 2021.

Figure C-7: Disability Concentrations and Sites Inventory (2019)



Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Familial Status

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

Regional Trend

According to the 2015-2019 ACS, 28.1% of San Clemente households are families with children.[13] The City's share of families with children is lower than the County (30.9%), but similar to neighboring cities including Laguna Niguel (26.6%), Mission Viejo (27.6%), and San Juan Capistrano (30.1%). Dana Point's share of families with children accounts for only 17.9% of households. Countywide, single-parent households make up 7.1% of all households, including 5% single-parent female-headed households.

Figure C-8 and Figure C-9 show the percent of children living in married couple households and female-headed households. Southern Orange County, including the cities and surrounding areas of San Clemente, Dana Point, Laguna Beach, Laguna Niguel, and Mission Viejo, tend to have higher concentrations of children living in married couple households. Fewer children live in married couple households in the northern section of the County, in areas such as Orange, Garden Grove, and Santa Ana. Fewer than 40% of children live in female-headed households in most Orange County census tracts. More than 40% of children live in female-headed in a handful of tracts located in Laguna Woods, Newport Beach, and Santa Ana.

Local Trend

As discussed above, approximately 28.1% of households in San Clemente are families with children, including 22.7% married couple households and 5.4% single-parent households, 3.7% of which are female-headed. Since the 2006-2010 ACS, the City has seen a decrease in families with children, including married-couple families and single-parent families. According to 5-year 2010 ACS estimates, there were approximately 7,668 families with children in San Clemente, compared to 6,844 currently.

As shown in Figure C-10, more than 60% of children live in married couple households in all San Clemente census tracts. In tracts along the southwestern City boundary and in the northwestern corner of the City, 60% to 80% of children live in married couple households, fewer compared to the rest of the City. There are no tracts in San Clemente where over 20% of children live in single-parent female-headed households (Figure C-9).

[13] Families with children refers to families with children of the householder.

Table C-9: Change in Household Type (2006-2019)

Household Type	2006-2010	2015-2019
Families with Children	33.0%	28.1%
Married Couple Families	25.7%	22.7%
Single-Parent Families	7.2%	5.4%
Male-Headed	2.3%	1.7%
Female-Headed	4.9%	3.7%
Total Households	23,235	24,384

Source: 2006-2010 and 2015-2019 ACS (5-Year Estimates).

According to the 2015-2019 ACS, 22.9% of households in San Clemente are single-person households compared to 21.1% Countywide. Additionally, 11% of households in the City and 9.1% of households in the County are elderly residents living alone. The slightly higher proportion of single households and single elderly households reflects the overall composition of the City; 17.7% of the San Clemente population is aged 65 or older, while only 14.4% of the population in the County falls into the same age range. Figure C-11 shows the concentration of adults living alone by tract. There are two tracts in the City where more than 20% of households are single-person households. The tract in the northwestern corner of the City has a larger population of elderly residents (27.1%). Despite the concentration of householders living alone in the tract 421.08 (along the western City boundary), only 11.6% of the population in this tract are aged 65 or older. Residents aged 15 to 44 comprise 44.9% of the population in tract 421.08, compared to only 28.7% in tract 422.06 (northwestern tract). Tract 421.08 has a higher concentration of racial/ethnic minority populations and persons below the poverty level (see Figure C-4 and Figure C-16).

According to City staff, the northwestern area is comprised mostly of condos/townhomes, which are less unaffordable than larger single-family homes, in 5 developments. There is also a senior living facility located in this area. The midwestern area of the City has older homes, which may indicate they are smaller and less unaffordable for a single person household. There are also concentrations of smaller, older multifamily dwellings, which also likely translate into less unaffordable for a single person household.

Sites Inventory

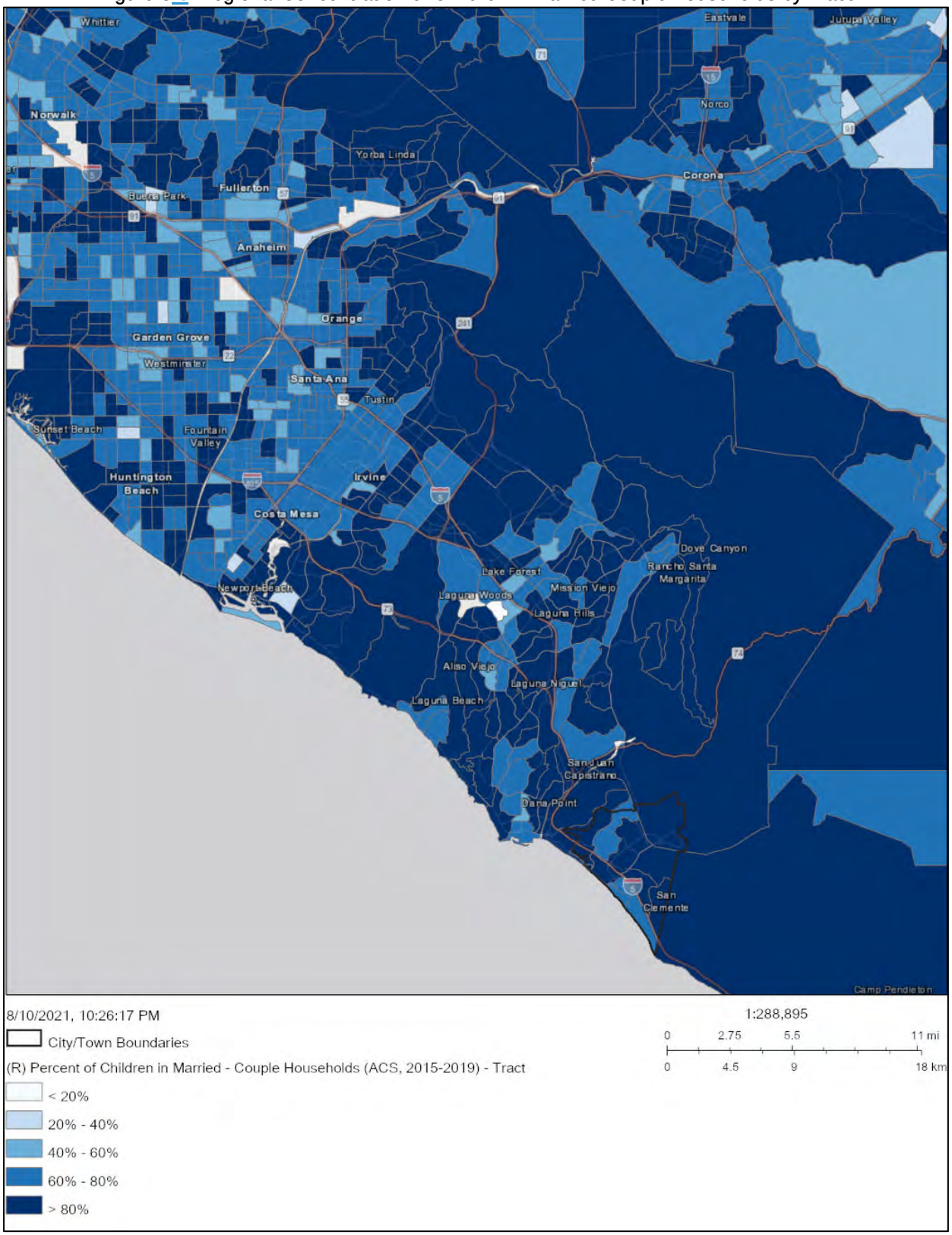
Figure C-10 shows the percent of children in married couple households by tract and the sites inventory used to meet the City's 2021-2029 RHNA. In a majority of San Clemente tracts, over 80% of children live in married couple households. However, as shown in Table C-10, only 53.8.% of lower income RHNA units are in tracts where over 80% of children live in married couple households, compared to 64.7% of moderate and 96% of above moderate income units. Overall, 71.8% of RHNA units are in tracts where over 80% of children live in married couple households. The remaining 28.2% of RHNA units, including 46.2% of lower income units, are in tracts where 60-80% of children live in married couple households. The distribution of RHNA sites by children in female-headed households was omitted because there are no tracts in San Clemente where the percent of children living in female-headed households exceeds 20%.

Table C-10: Distribution of RHNA Units by Percent of Children in Married Couple Households

Percent of Children in Married Couple Households (Tract)	Lower Income Units	Moderate Income Units	Above Moderate Income Units	All RHNA Units

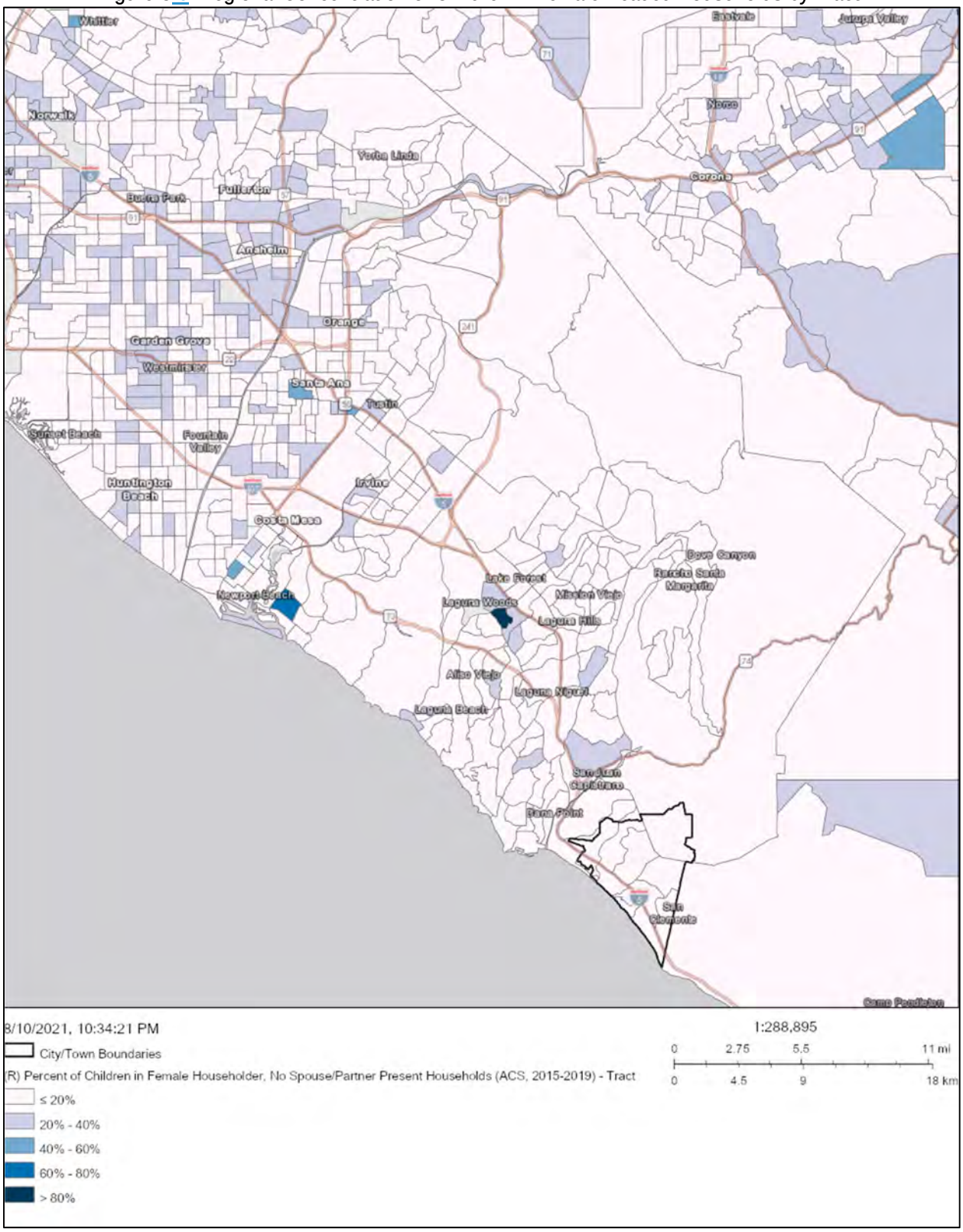
60-80%	349	46.2%	132	35.3%	27	4.0%	508	28.2%
>80%	407	53.8%	242	64.7%	644	96.0%	1,293	71.8%
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Figure C-8: Regional Concentration of Children in Married Couple Households by Tract



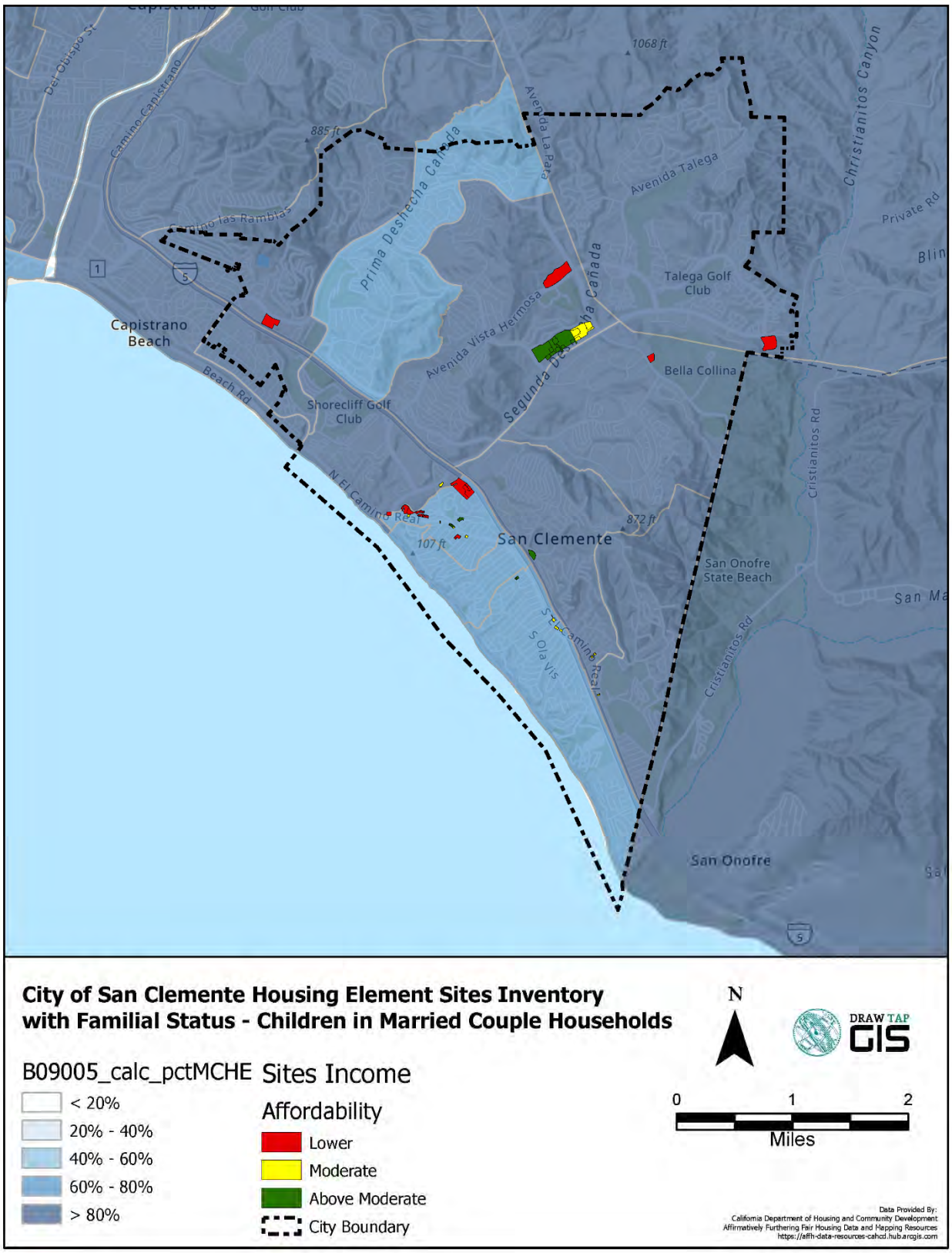
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure C-9: Regional Concentration of Children in Female-Headed Households by Tract



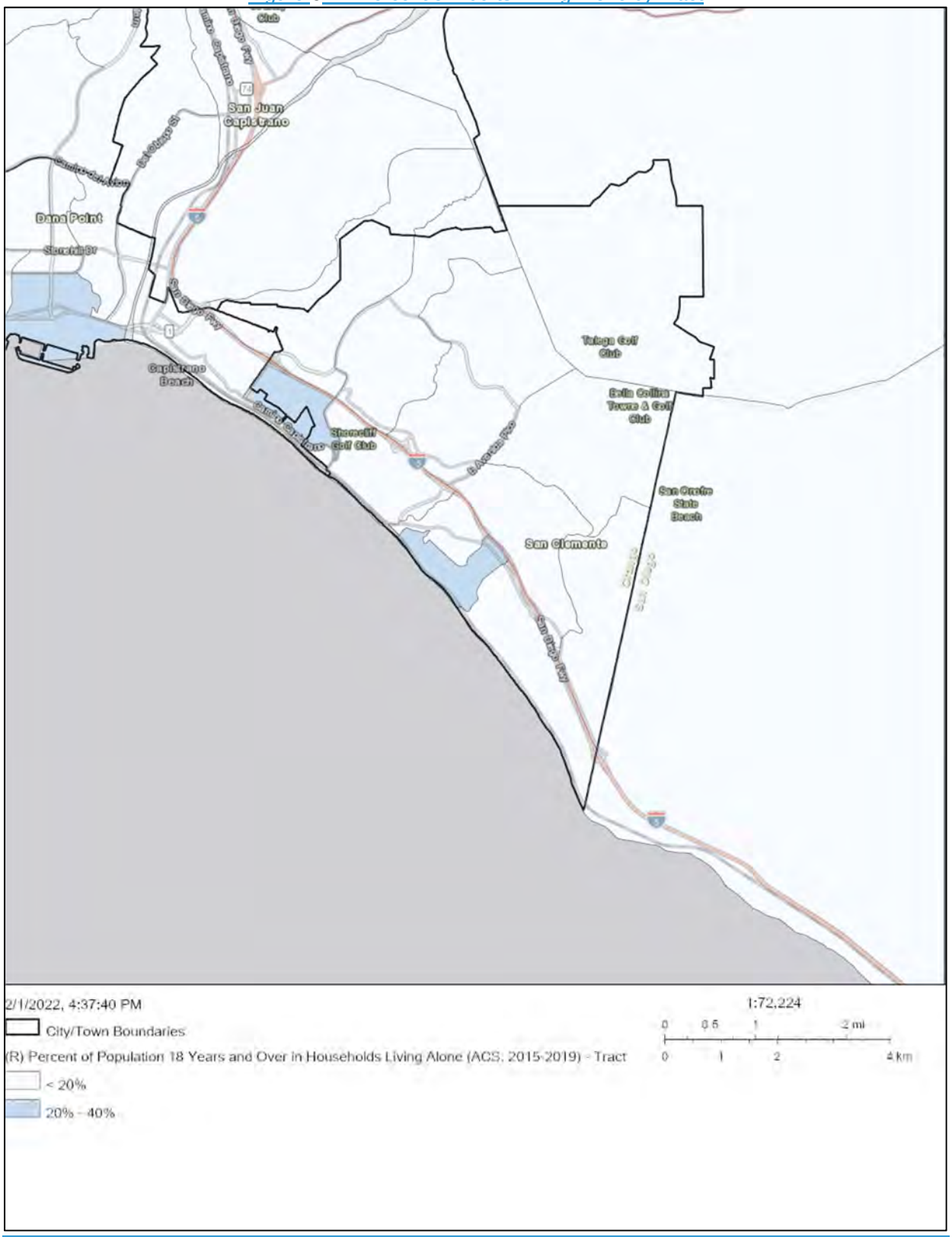
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure C-10: Concentration of Children in Married Couple Families and Sites Inventory



Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure C-11: Percent of Adults Living Alone by Tract



Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Income

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

Regional Trend

HUD's 2013-2017 CHAS data (Table C-11) shows that 34.4% (10.3% + 10.4% + 13.7%) of San Clemente households earn 80% or less than the area median family income and are considered lower income, compared to 44.8% Countywide (14.9% + 12.5% + 17.4%). According to the 2015-2019 ACS, the median household income in San Clemente is $110,434, significantly higher than $90,234 in Orange County. Figure C-12 shows concentrations of LMI households in the Orange County region. LMI households are most concentrated around Buena Park, Garden Grove, Anaheim, and Santa Ana where in many tracts, over 50% of households are low or moderate income. Most tracts in the southern areas of Orange County have less than 50% LMI households.

Local Trend

Figure C-13 shows the Lower and Moderate Income (LMI) areas in the City by census block group and sites used to meet the City's RHNA. In most of the northern and eastern sections of the City, LMI households make up less than 25% of the block group population. Block groups with larger LMI populations are generally concentrated in the southern section of the City and along the western City boundary. There are three block groups in San Clemente where the LMI population exceeds 75% located along the western City boundary.

Some block groups with higher concentrations of LMI households also contain mobile home parks which typically house lower income households (see Figure C-50) There are concentrations of fair housing issues related to segregation, access to opportunities, and disproportionate housing needs in San Clemente, specifically in tracts 421.07 and 421.08 located along the central western City boundary. Up to 5% of renters receive HCVs in these tracts. Additionally, these communities contain block groups with higher concentrations of racial/ethnic minority populations and LMI households. There are fewer children living in married couple households in this area and tract 421.08 has a larger percentage of householders living alone and persons below the poverty level. Tract 421.07 is categorized as a low resource tract, the only low resource area in the City. Further, this area has worse CalEnviroScreen and jobs proximity index scores but are still at levels better than other tracts in Orange County. Tract 421.07 is also the only tract in the City with concentrations of overcrowded households exceeding the Statewide average of 8.2%. Housing units tend to be older in this section of the City and both tracts are considered sensitive communities at risk of displacement. In general, San Clemente has positive healthy places index scores throughout the City.

As shown in Figure C-51 there is one subsidized housing project and one mobile home park in these communities, which may contribute to the concentration of sensitive populations, as these housing types typically house lower income households. Figure C-51 also shows the Healthy Places Index (HPI) by tract. HPI uses community conditions, including housing, transportation, and environmental conditions, to predict life expectancy. It is relevant to note that three of the six subsidized housing projects are in the highest scoring HPI tracts (>80 percent) and two are in the second highest scoring tracts (60 to 80 percent). Tracts 421.07 and 421.08 have the lowest HPI scores in the City. According to the HPI, these tracts have most park access and retail density, but lower supermarket access (Figure C-51, Figure C-52, Figure C-53).

These neighborhoods also have high employment rates but lower median incomes and fewer persons with college degrees (Figure C-54, Figure C-55, Figure C-56). Homeownership is also lower in these tracts and a significantly lower proportion of adults have health insurance (Figure C-57, Figure C-58). Tract 421.08 also has a larger population of non-English speakers compared to the remainder of the City (Figure C-59). Downtown San Clemente is located in tract 421.08, and likely has more lower paying retail and service jobs due to the concentration of retail and service employers in the area. According to the HPI, there is also a higher concentration of adults who work outdoors in these communities (Figure C-60).

Figure C-50). There are two subsidized housing projects in near the concentration of LMI households in the central western area of the City, and two in the northeastern corner of the City. One tract along the central western City boundary, with higher concentration of LMI households, also has a larger Hispanic population, while the remainder of the City has White majority populations.

Table C-11: Distribution of Households by Income Level

Income Category	San Clemente		Orange County	
	Households	Percent	Households	Percent
<30% HAMFI	2,540	10.3%	152,410	14.9%
31-50% HAMFI	2,550	10.4%	128,445	12.5%
51-80% HAMFI	3,365	13.7%	178,365	17.4%
81-100% HAMFI	2,315	9.4%	104,380	10.2%
>100% HAMFI	13,795	56.2%	461,375	45.0%
Total	24,565	100%	1,024,975	100.0%

Source: HUD CHAS data (2013-2017 ACS), 2020.

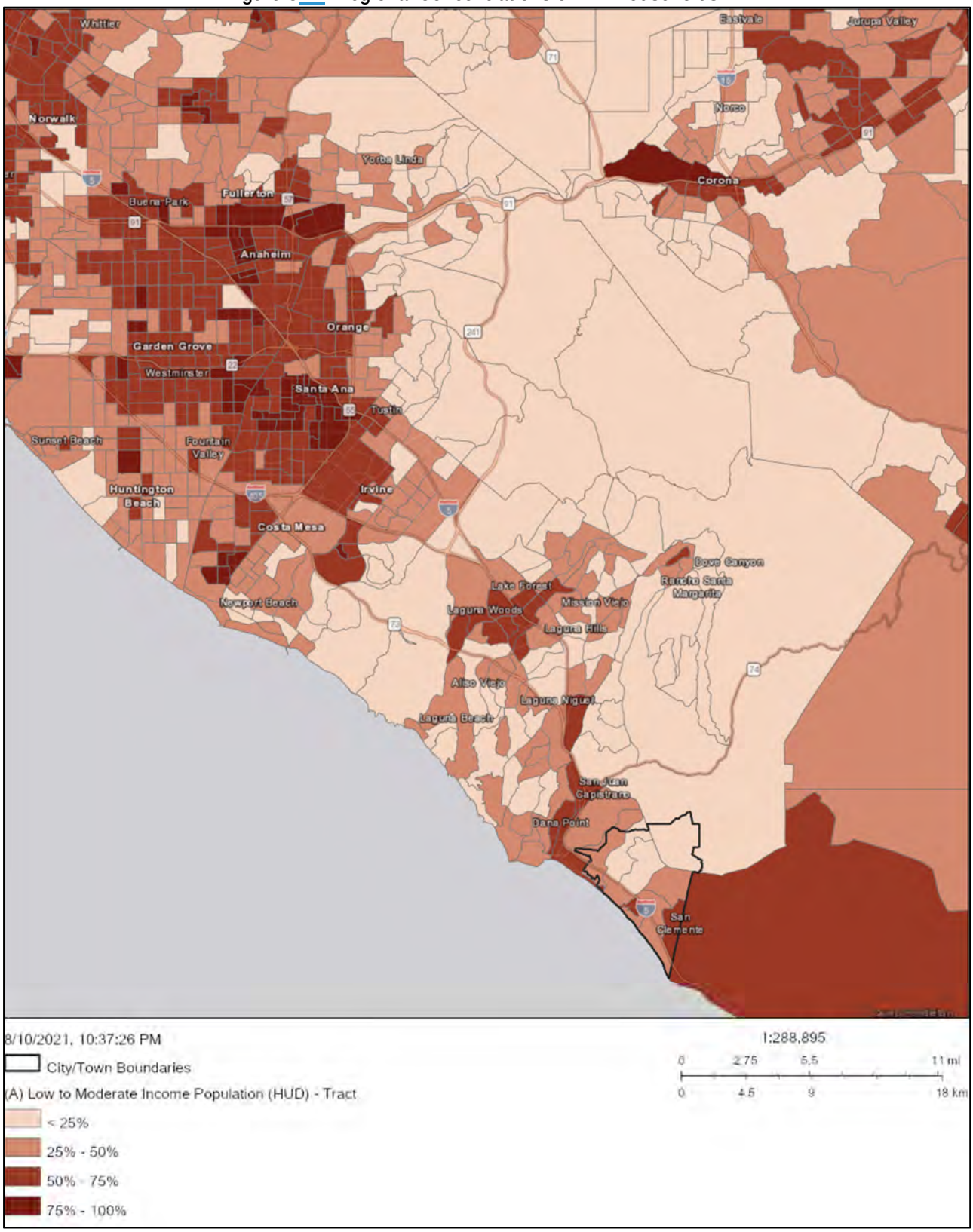
Sites Inventory

Over half (52.7%) of all RHNA units are in block groups with an LMI population below 25% (Table C 6). However, only 15.1% of lower income units and 62.6% of moderate income units, and 89.7% of above moderate income units are in block groups where the LMI population accounts for less than 25% of the population. As discussed above, LMI areas are considered tracts or block groups where more than 50% of the population is low or moderate income. A significantly higher proportion of lower income units are in LMI areas (46.2%) compared to moderate income units (27%) and above moderate income units (2.8%).

Table C-12: Distribution of RHNA Units by LMI Population

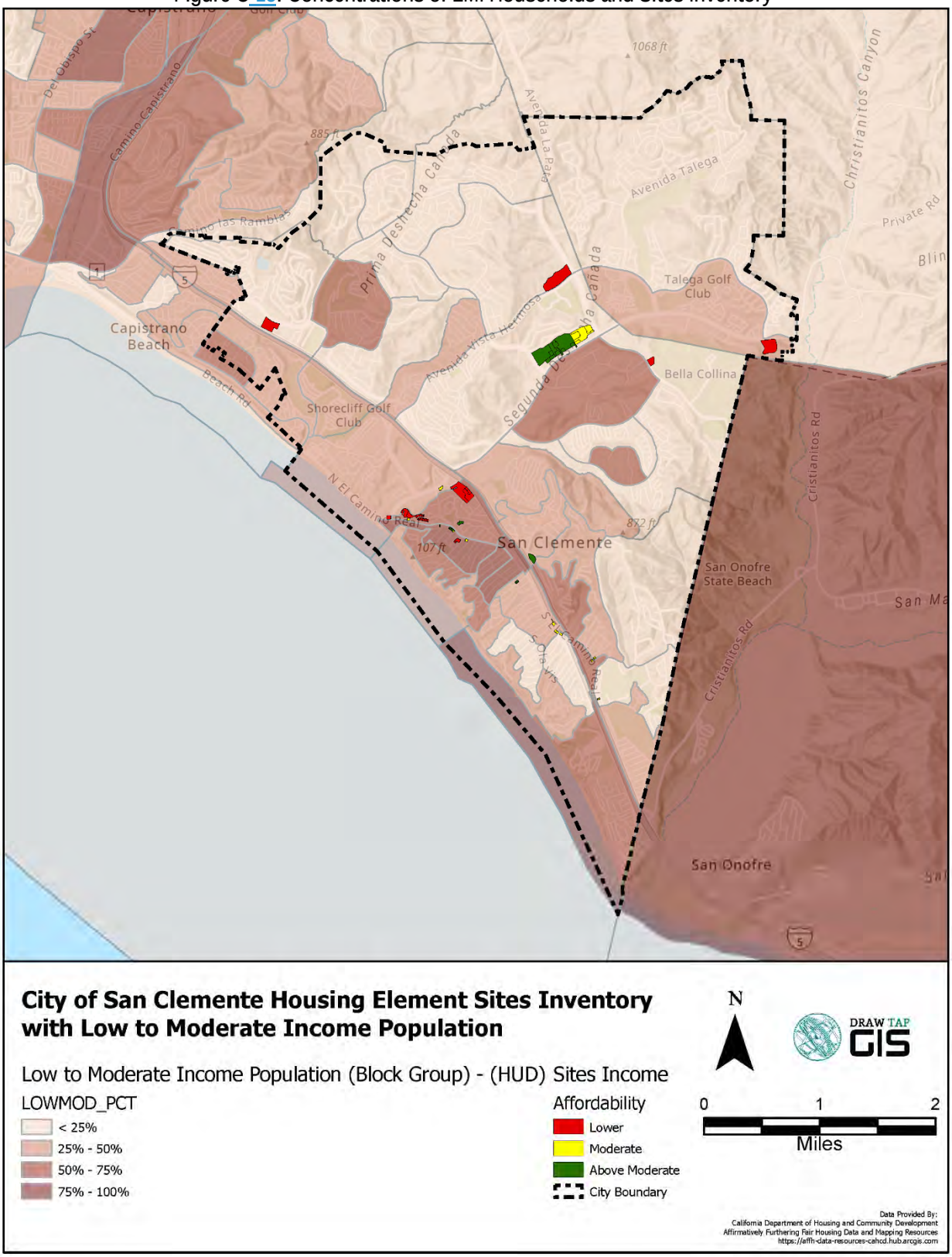
LMI Population (Block Group)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
<25%	114	15.1%	234	62.6%	602	89.7%	950	52.7%
25-50%	293	38.8%	39	10.4%	50	7.5%	382	21.2%
50-75%	332	43.9%	85	22.7%	7	1.0%	424	23.5%
75-100%	17	2.2%	16	4.3%	12	1.8%	45	2.5%
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Figure C-12: Regional Concentrations of LMI Households



Source: HCD AFFH Data Viewer (HUD, 2020), 2021.

Figure C-13: Concentrations of LMI Households and Sites Inventory



Source: HCD AFFH Data Viewer (HUD, 2020), 2021.

Summary of Fair Housing Issues

According to HUD dissimilarity indices, segregation in San Clemente is low, while the County is moderately segregated. San Clemente has a significantly larger White population compared to the region. San Clemente generally has a small racial/ethnic minority population; however, there are concentrations of racial/ethnic minorities in some block groups on the western side of the City along Interstate 5. The area along the central western boundary of the City has larger Hispanic populations while the remainder of the City has White majority populations. There are more lower income RHNA units in block groups with higher concentrations of racial/ethnic minorities compared to moderate and above moderate income units. These block groups also have higher concentrations of LMI households. More than half of lower income RHNA units are in LMI areas where more than 50% of households are low or moderate income. However, the potential rezone sites help to move that metric by identifying sites that meet the minimum density to accommodate lower income households in areas with lower concentrations of LMI and higher concentrations of White households.

Most of the City has populations of persons with disabilities below 10% and there are no concentrations of children in female-headed households. Over 90% of RHNA units are in tracts where less than 10% of the population experiences a disability.

C.2.3 Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50%) and has a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. According to HCD's AFFH Data Viewer based on HUD's R/ECAP database, there are no R/ECAPs in San Clemente. Figure C-14 shows TCAC designated areas of high segregation and poverty, R/ECAPs, and poverty status by tract. There are no TCAC designated areas of high segregation and poverty or R/ECAPs in the southern Orange County areas. The Costa Mesa, Santa Ana, Garden Grove, and Anaheim areas have the highest concentration of persons under the poverty level, R/ECAPs, and areas of high segregation and poverty.

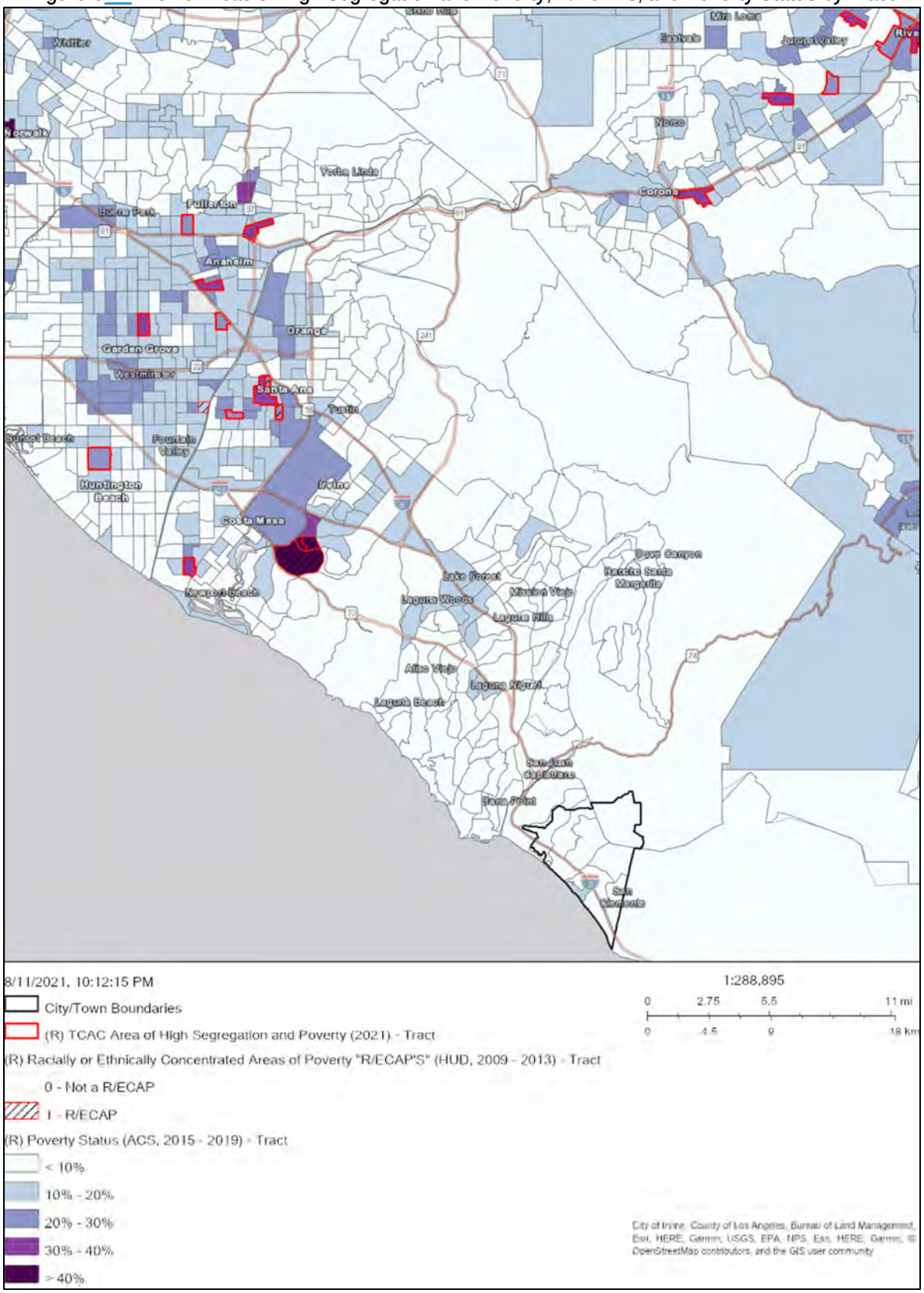
There is one tract in San Clemente where 11.6% of the population is below the federal poverty level. This tract also contains block groups where 21-40% of the population belongs to a racial or ethnic minority group. Figure C-15 and Figure C-16 compare change poverty status by tract in San Clemente since the 2010-2014 ACS. The population below the poverty level has been significantly reduced in the area along the western border. During the 2010-2014 ACS, 30% to 40% percent of the population was below the poverty level in one tract, and 10% to 20% of the population was below the poverty level in three tracts. Black/African American and American Indian/Alaska Native residents have the highest rates of poverty in San Clemente of 12.3% and 11.1%, respectively. There are no Native Hawaiian/Other Pacific Islander residents experiencing poverty. Approximately 4.4% of residents of two or more races and 5% of the White population are below the poverty level.

Table C-13: Poverty Status by Racial/Ethnic Group

Race/Ethnicity	Total Population	Below Poverty Level
White alone, not Hispanic or Latino	48,412	5.0%
Black or African American alone	504	12.3%
American Indian and Alaska Native alone	252	11.1%
Asian alone	2,750	6.9%
Native Hawaiian and Other Pacific Islander alone	86	0.0%
Some other race alone	4,113	8.9%
Two or more races	3,241	4.4%
Hispanic or Latino origin (of any race)	10,512	5.7%

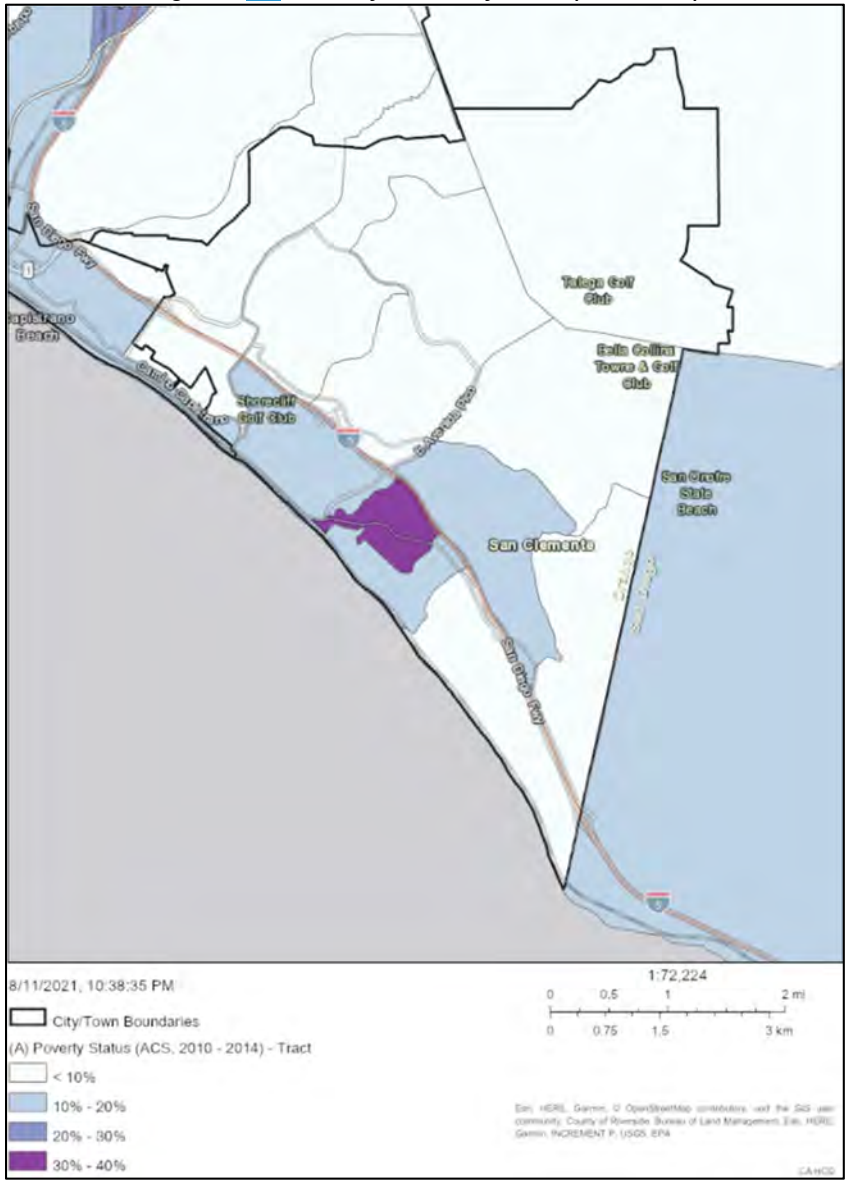
Source: 2015-2019 ACS (5-Year Estimates).

Figure C-14: TCAC Areas of High Segregation and Poverty, R/ECAPs, and Poverty Status by Tract



Source: HCD AFFH Data Viewer (TCAC 2021, HUD 2009-2013, 2015-2019 ACS), 2021.

Figure C-15: Poverty Status by Tract (2010-2014)



Source: HCD AFFH Data Viewer (2010-2014 ACS), 2021.

Figure C-16: Poverty Status by Tract (2015-2019)

Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Racially/Ethnically Concentrated Areas of Affluence

While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. A HUD policy paper defines racially concentrated areas of affluence as affluent, White communities.[14] According to the HUD report, Whites are the most racially segregated group in the United States and "in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities."

Based on this research, HCD defines RCAAs as census tracts where 80% or more of the population is White and the median household income is $125,000 or greater (slightly twice the national median household income in 2016). As discussed previously, there are several block groups in the City where less than 20% of the population belongs to a racial/ethnic minority group. Figure C-17 shows racial/ethnic minority populations and median income by block group. There are five block groups where the non-White population is below 20% and the median income is greater than $125,000. Two are located in southern San Clemente along Interstate 5, one in the central area at the intersection of Avenida Pico and Interstate 5, one in the northwestern corner, and two along the northern City boundary.

The 2015-2019 ACS estimates presented in Table C-14 below show that in San Clemente, populations of two or more races have the highest median income of $132,833, followed by Asian residents ($127,760). Countywide, non-Hispanic White populations ($101,958) and Native Hawaiian and other Pacific Islander populations ($95,150) have the highest median incomes. In San Clemente, residents of a race not listed ("some other race") and American Indian and Alaska Native populations have the lowest median incomes. Populations of some other race and American Indian and Alaska Native populations represent 4.4% and 0.4% of the City's population, respectively. Non-Hispanic Whites and Hispanic/Latinos, making up the largest proportions of San Clemente's population, earn median incomes of $114,515 and $84,132, respectively.

[14] Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation.' Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in Cityscape: A Journal of Policy Development and Research (21,1, 99-123).

Table C-14: Race/Ethnicity and Median Income

Race/Ethnicity	San Clemente		Orange County	
	Percent Distribution	Median Income	Percent Distribution	Median Income
White alone, not Hispanic or Latino	81.4%	$114,515	52.0%	$101,958
Hispanic or Latino origin (of any race)	12.0%	$84,132	24.2%	$68,971
Black or African American	0.5%	--	1.8%	$76,136
American Indian and Alaska Native	0.4%	$68,684	0.4%	$72,476
Asian	3.2%	$127,760	19.6%	$93,777
Native Hawaiian and Other Pacific Islander	0.2%	--	0.3%	$95,150
Some other race	4.4%	$64,798	8.1%	$62,963
Two or more races	3.2%	$132,833	2.7%	$91,071

-- = Insufficient data.
Source: 2015-2019 ACS (5-Year Estimates).

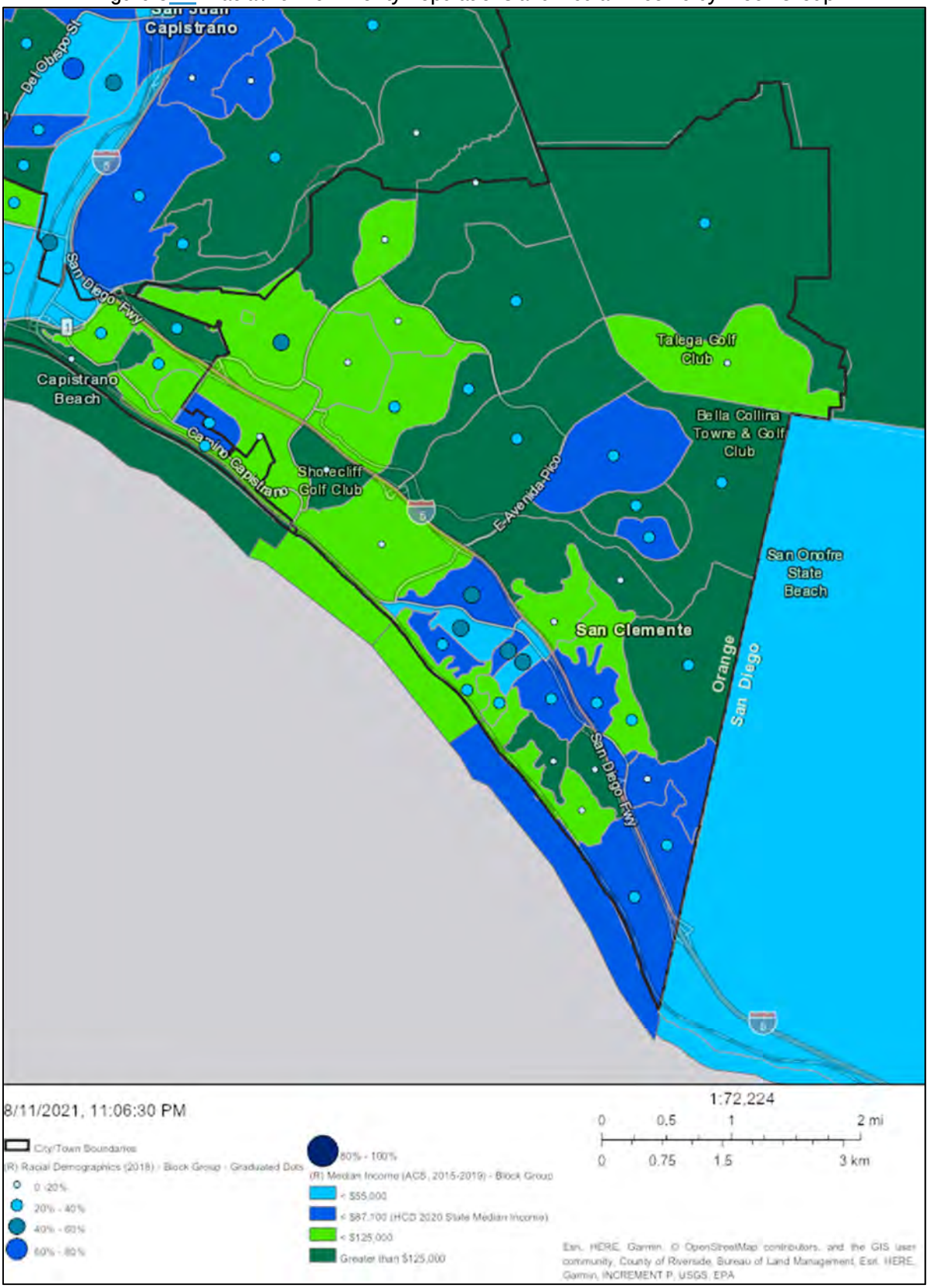
Employment status and rates by racial and ethnic groups are shown in Table C-15. Of the working age population in San Clemente, aged 20 to 64, 79% are in the labor force and 72.1% are employed. Native Hawaiian and other Pacific Islander residents have a significantly higher unemployment rate of 16.2% compared to other racial/ethnic groups. The unemployment rate for the population of persons of two or more races is 8.5%, followed by 7.5% amongst African Americans. Populations of some other race and Asian populations have the lowest rates of unemployment of 3.4% and 5.1%, respectively. Despite having the lowest unemployment rate, persons of a race not listed have the lowest median income. Further, despite non-Hispanic White and Hispanic/Latino populations having the same unemployment rate of 7.3%, Hispanic/Latinos have a significantly lower median income. This pattern indicates that Hispanic/Latino workers in San Clemente are paid less or have lower paying jobs compared to non-Hispanic Whites, which are paid lower than populations of two or more races and Asian populations. According to the 2015-2019 ACS, the tracts along the western City boundary containing block groups with lower median incomes and larger non-White populations have significantly larger Hispanic/Latino populations of 34.6% and 20.5% compared to the rest of the City (16.4%).

Table C-15: San Clemente Labor Force Participation and Employment Rate by Race/Ethnicity

Race/Ethnicity	In Labor Force	Employed	Unemployment Rate
White alone, not Hispanic or Latino	65.3%	59.2%	7.3%
Hispanic or Latino origin (of any race)	71.4%	64.6%	7.3%
Black or African American	63.7%	53.8%	7.5%
American Indian and Alaska Native	54.8%	51.1%	6.7%
Asian	64.4%	60.8%	5.1%
Native Hawaiian and Other Pacific Islander	80.4%	67.4%	16.2%
Some other race	75.2%	70.8%	3.4%
Two or more races	70.6%	64.6%	8.5%
Population 20 to 64 years	79.0%	72.1%	6.6%

Source: 2015-2019 ACS (5-Year Estimates).

Figure C-17: Racial/Ethnic Minority Populations and Median Income by Block Group



Source: HCD AFFH Data Viewer (2010-2014 ACS), 2021.

Summary of Fair Housing Issues

There are no R/ECAPs or TCAC designated areas of high segregation and poverty in San Clemente. There is one tract in the City where more than 10% of the population is below the poverty level. Black or African American and American Indian and Alaska Native populations experience poverty at the highest rate. There are five RCAAs in the City; however, RCAAs are not generally concentrated in one area of the City. Areas with lower median incomes are most concentrated in the southern areas of the City. Block groups with lower median incomes in the southwestern section of the City along Interstate 5 also have higher concentrations of racial/ethnic minorities and LMI households (see Figure C-4and Figure C-13).

C.2.4Access to Opportunities

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity. Table C-16 shows index scores for the following opportunity indicator indices in San Clemente and the Orange County region (values range from 0 to 100):

- **Low Poverty Index:** The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** The higher the trips transit index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The higher the value, the better environmental quality of a neighborhood.

As shown in Table C-16, Hispanic and Native American communities in San Clemente were more likely to be impacted by poverty. Asian/Pacific Islander and Black communities were most likely to have access to higher quality school systems. Hispanic communities had the lowest labor force participation and were least likely to have access to employment opportunities.

Of the population below the federal poverty line, Black residents were the most likely reside in areas with the lowest environmental quality levels, lowest school proficiency, lowest labor market engagement and most exposure to poverty.

Compared to the Orange County region, San Clemente residents, regardless of race or ethnicity, were less likely to be exposed to poverty, had more access to high quality school systems, had higher labor market participation, and experienced better environmental quality.

Table C-16: HUD Opportunity Indicators by Race/Ethnicity

	Low Poverty	School Proficiency	Labor Market	Transit	Low Transportation Cost	Jobs Proximity	Environmental Health
San Clemente							
Total Population							
White, non-Hispanic	76.02	73.91	77.79	15.18	58.61	30.53	54.50
Black, non-Hispanic	75.72	74.47	77.50	15.14	58.28	33.23	53.99
Hispanic	64.41	66.23	74.88	16.13	64.05	28.18	54.33
Asian/Pacific Islander, non-Hispanic	77.00	75.99	77.85	14.57	56.60	36.23	53.93
Native American, non-Hispanic	70.21	72.47	77.11	16.20	60.72	31.36	54.49
Population below federal poverty line							
White, non-Hispanic	72.53	69.89	77.05	15.87	60.90	29.70	54.94
Black, non-Hispanic	33.81	63.97	69.04	14.71	67.68	30.34	53.00
Hispanic	64.44	65.67	75.42	15.59	64.76	30.60	54.22
Asian/Pacific Islander, non-Hispanic	75.99	79.46	77.89	13.66	59.13	42.42	53.36
Native American, non-Hispanic	69.92	82.92	81.47	13.38	53.61	35.91	53.08
Orange County Region							
Total Population							
White, non-Hispanic	65.19	68.03	67.43	77.63	73.13	54.59	21.35
Black, non-Hispanic	36.07	33.82	35.34	87.25	79.02	40.72	11.92
Hispanic	35.53	39.72	35.73	86.48	77.78	43.70	12.36
Asian/Pacific Islander, non-Hispanic	55.03	61.94	57.64	85.13	75.98	51.11	13.13
Native American, non-Hispanic	48.40	50.70	48.58	81.04	75.36	45.88	17.68
Population below federal poverty line							
White, non-Hispanic	53.66	60.62	59.62	83.19	78.51	56.98	18.46
Black, non-Hispanic	24.12	28.03	26.41	88.34	81.07	36.90	11.74
Hispanic	25.05	33.70	29.50	89.09	80.94	44.63	10.63
Asian/Pacific Islander, non-Hispanic	45.45	57.59	51.41	88.58	80.61	52.88	11.05
Native American, non-Hispanic	33.63	39.10	36.05	84.43	78.22	47.65	16.22

Source: Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool (AFFH-T), 2020.

To assist in this analysis, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened as 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 created Opportunity Maps to identify resources levels across the state "to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with nine percent Low Income Housing Tax Credits (LIHTCs)". These opportunity maps are made from

composite scores of three different domains made up of a set of indicators. Table C-17 shows the full list of indicators.

Table C-17: Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Poverty and Racial Segregation	Poverty: tracts with at least 30% of population under federal poverty line Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020.

Regional Trend

As shown in Figure C-18, Orange County contains a mix of highest, high, moderate, and low resource tracts. Low resource tracts are most concentrated in the Santa Ana/Anaheim areas; smaller concentrations are also located around the cities of Dana Point and Laguna Woods. Highest resource tracts are most concentrated in the coastal areas from Laguna Beach to Newport Beach and in some Huntington Beach tracts.

Local Trend

Table C-18 shows the Opportunity Map scores for the census tracts in the City. Categorization is based on percentile rankings for census tracts within the Orange County region. High composite scores mean higher resources. All tracts but one in the City are considered moderate resource. The Opportunity Map is shown in Figure C-19. The low resource tract is located along the western City boundary along Interstate 5. The low resource tract also has larger racial/ethnic minority and LMI populations, and fewer children living in married couple households compared to the rest of the City. The domain scores by tract are shown geographically in the following sections. The low resource tract has a higher Hispanic population while the remainder of the tracts in the City have higher White populations. This tract also has higher concentrations of overcrowded households and is considered a sensitive community at risk of displacement. Disproportionate housing needs, including displacement risk, are detailed in Section C.2.5, *Disproportionate Housing Needs*, below.

Table C-18: Opportunity Map Scores and Categorization

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index	Final Category
6059042103	0.615	0.782	0.334	-0.012	Moderate Resource
6059042114	0.409	0.806	0.385	-0.015	Moderate Resource

6059042108	0.371	0.825	0.225	-0.199	Moderate Resource
6059042107	0.135	0.846	0.225	-0.349	Low Resource
6059042113	0.333	0.951	0.225	-0.177	Moderate Resource
6059042109	0.333	0.951	0.225	-0.177	Moderate Resource
6059042106	0.549	0.594	0.354	-0.059	Moderate Resource
6059042112	0.549	0.594	0.354	-0.059	Moderate Resource
6059042206	0.388	0.745	0.381	-0.061	Moderate Resource
6059042111	0.463	0.501	0.381	-0.082	Moderate Resource
6059042205	0.513	0.414	0.177	-0.295	Moderate Resource
6059032023	0.664	0.355	0.452	0.043	Moderate Resource

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020.

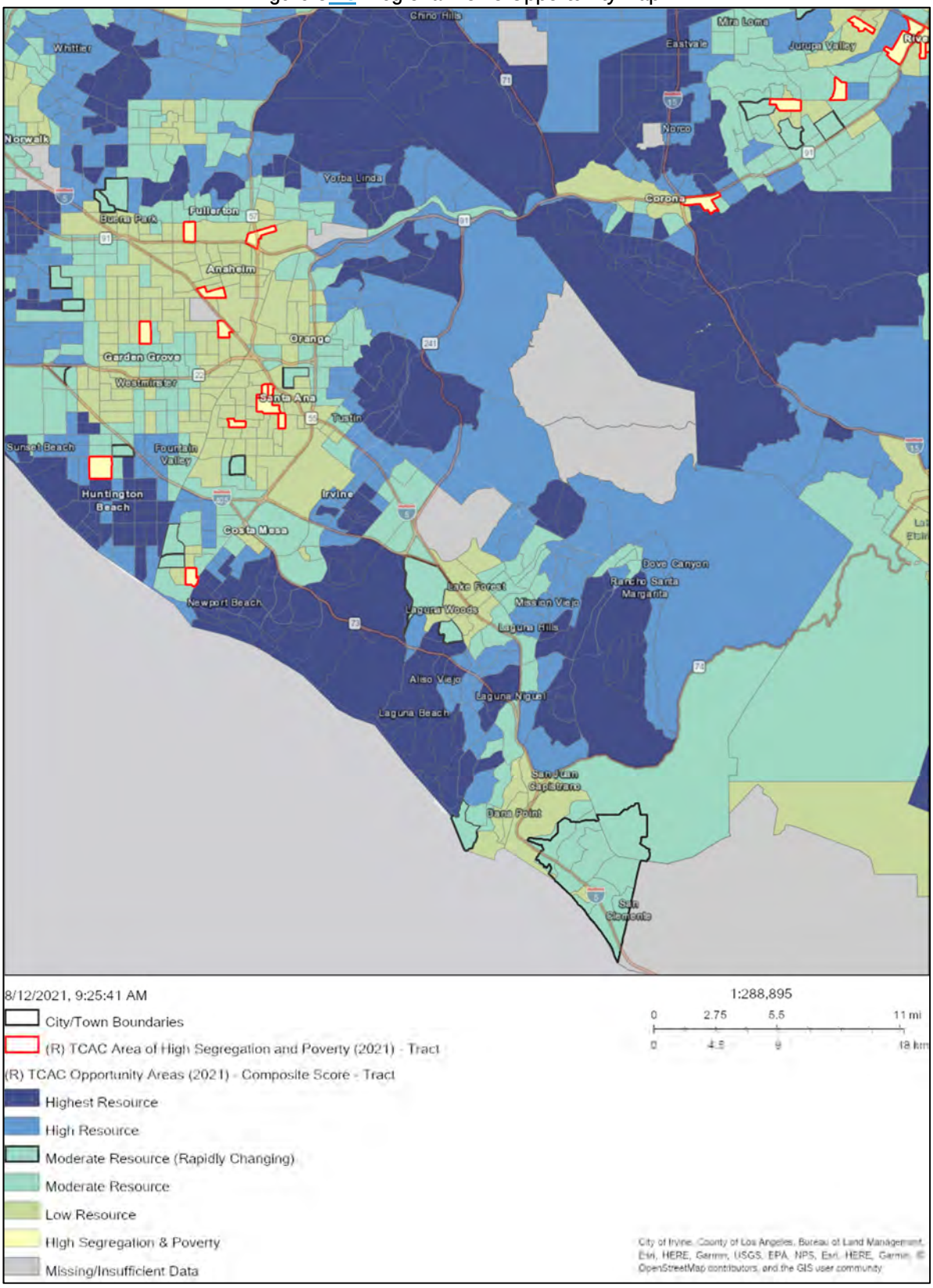
Sites Inventory

As shown in Figure C-19, there are several sites used to meet the City's 2021-2029 RHNA in the low resource tract. Approximately 74.1% of RHNA units are in moderate resource tracts and 25.9% are in low resource tracts. A larger proportion of lower income units (46.2%) are in the low resource tract compared to moderate income units (26.5%) and above moderate income units (2.8%). As discussed previously, this area also has larger proportions of racial/ethnic minorities and LMI households. All but one tract in San Clemente are categorized a moderate resource; however, only 53.8% of lower income units are in moderate resource tracts.

Table C-19: Distribution of RHNA Units by TCAC Opportunity Map Category

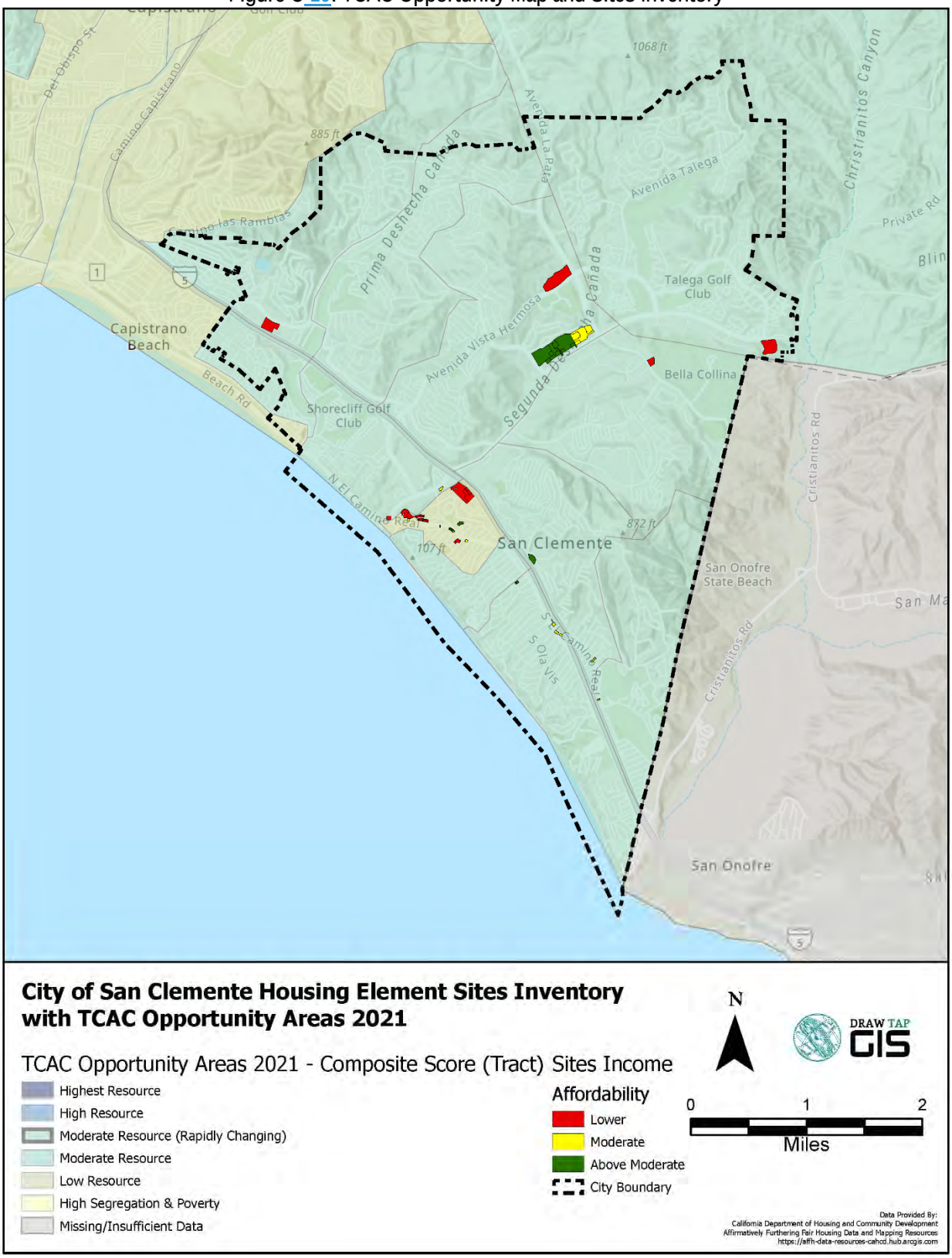
TCAC Opportunity Map Categorization (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
Moderate Resource	407	53.8%	275	73.5%	652	97.2%	1,334	74.1%
Low Resource	349	46.2%	99	26.5%	19	2.8%	467	25.9%
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Figure C-18: Regional TCAC Opportunity Map



Source: HCD AFFH Data Viewer (2021 TCAC/HCD Opportunity Map), 2021.

Figure C-19: TCAC Opportunity Map and Sites Inventory



Source: HCD AFFH Data Viewer (2021 TCAC/HCD Opportunity Map), 2021.

Economic

As discussed previously, economic scores are determined by the Fair Housing Task Force based on the following indicators: poverty, adult education, employment, job proximity, and median home value. Refer to Table C-17 for the complete list of TCAC Opportunity Map domains and indicators.

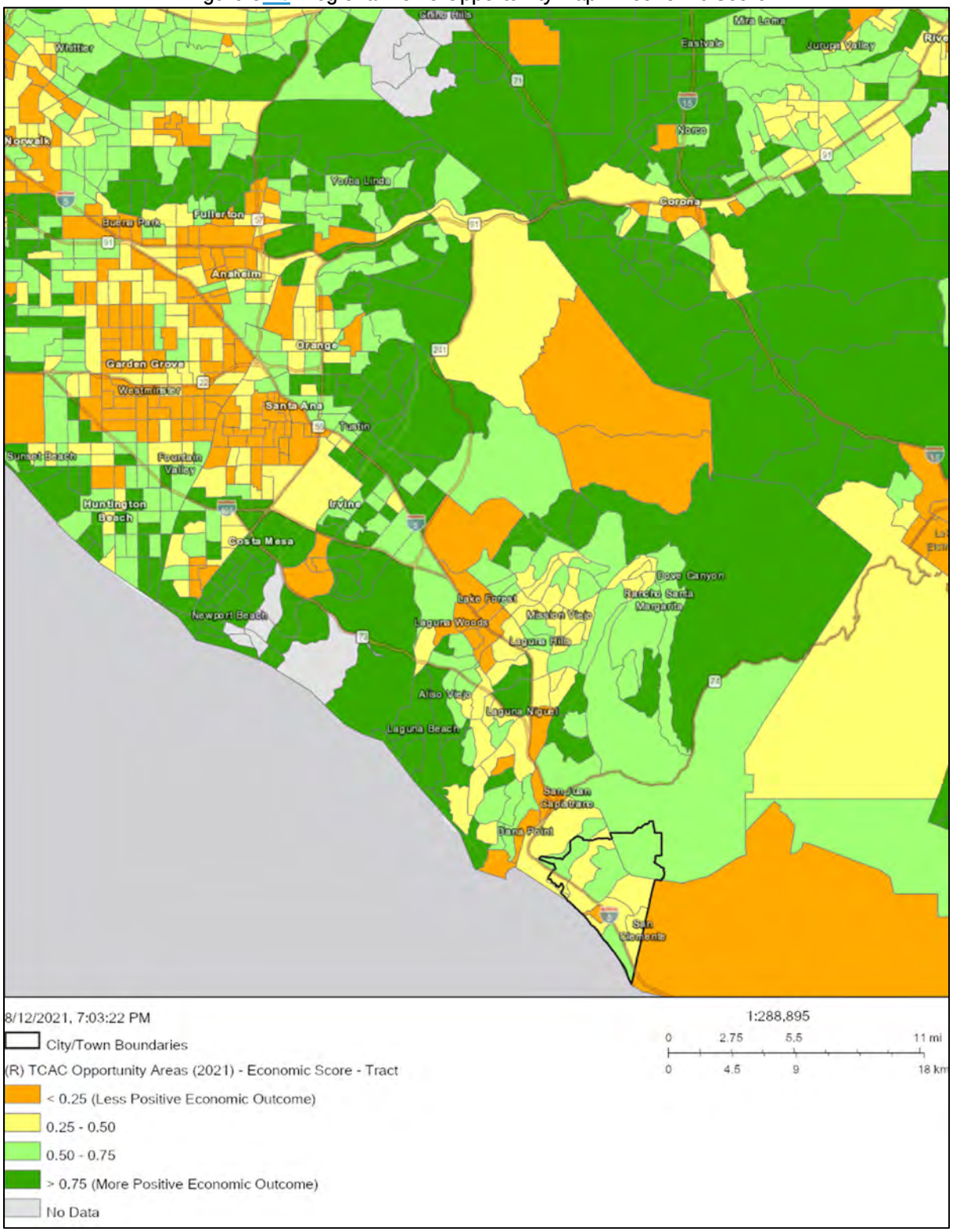
Regional Trend

Consistent with the overall TCAC opportunity area categorizations, tracts with the lowest economic score are most concentrated in Garden Grove, Anaheim, and Santa Ana (Figure C-20). Tracts with more positive economic scores are located in the coastal areas from Laguna Beach to Huntington Beach, the northeastern County areas near Yorba Linda, areas along the Interstate 241 in Irvine, and in the areas surrounding Rancho Santa Margarita. The southern County areas, from Laguna Woods to San Clemente, are comprised of tracts with a mix of economic scores, a majority ranging from 0.25 to 0.75.

Local Trend

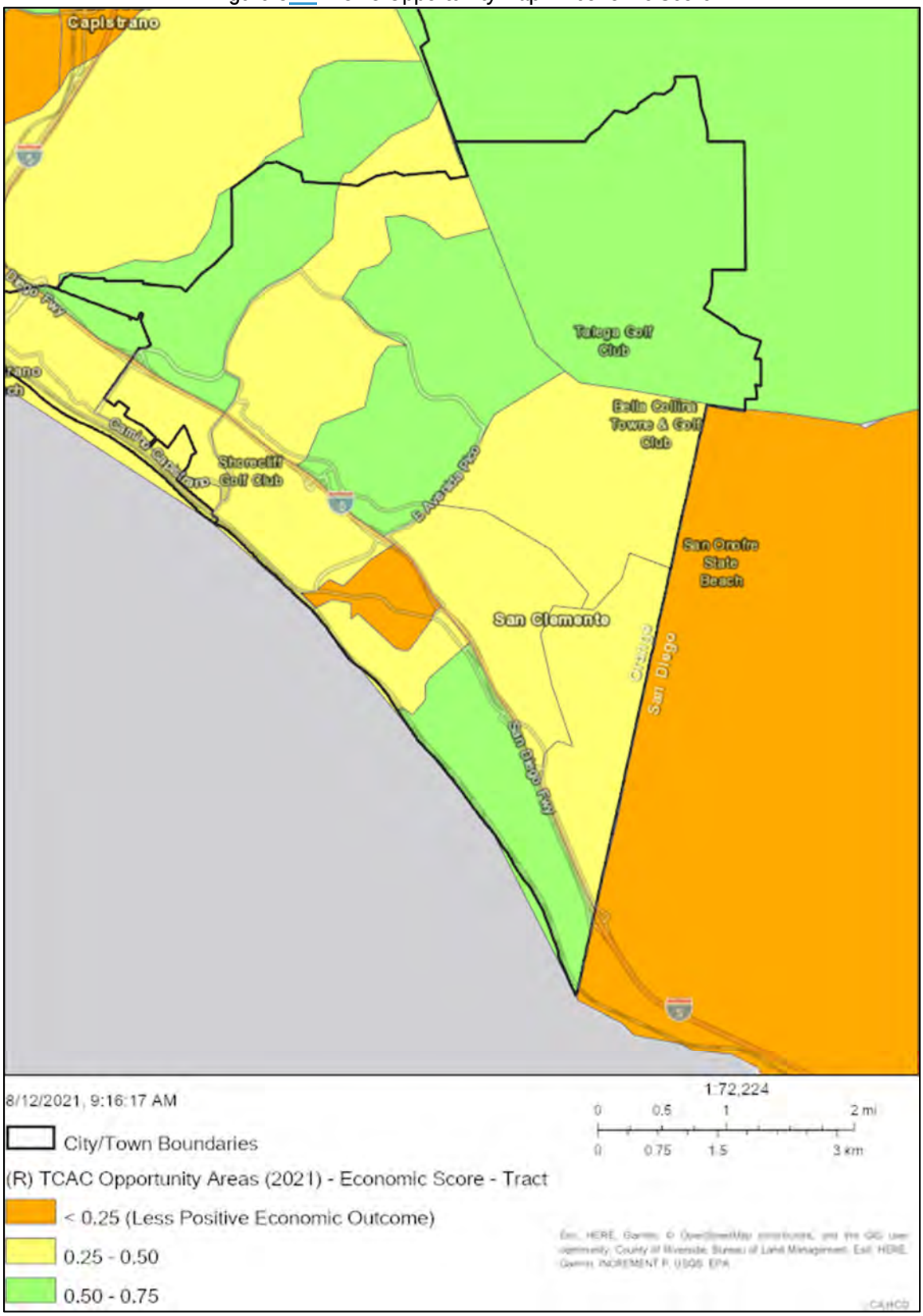
Figure C-21 presents Task Force economic scores by census tract. All but one tract in the City received economic scores between 0.25 and 0.75. One tract, located along the western City boundary, scored in the lowest quartile. This tract is categorized as a low resource area (see Figure C-19). This tract also has higher concentrations of racial/ethnic minorities, LMI populations, and lower concentrations of children in married couple households (see Figure C-4, Figure C-10, and Figure C-13). As discussed previously, over 50% of lower income units used to meet the RHNA are in this tract. According to UC Berkeley's Urban Displacement project, the tract with the lowest economic score (421.07) along with both tracts south of tract 421.07 (tracts 421.08 and 421.03) have a higher job displacement risk due to COVID-19. Job displacement risk is further discussed in Section C.2.5, *Disproportionate Housing Needs*: *Displacement*.

Figure C-20: Regional TCAC Opportunity Map – Economic Score



Source: HCD AFFH Data Viewer (2021 TCAC Opportunity Map), 2021.

Figure C-21: TCAC Opportunity Map – Economic Score



Source: HCD AFFH Data Viewer (2021 TCAC Opportunity Map), 2021.

Education

The Fair Housing Task Force uses math and reading proficiency, high school graduation rates, and student poverty rates to determine education scores for census tracts. Refer to Table C-17 for the complete list of TCAC Opportunity Map domains and indicators.

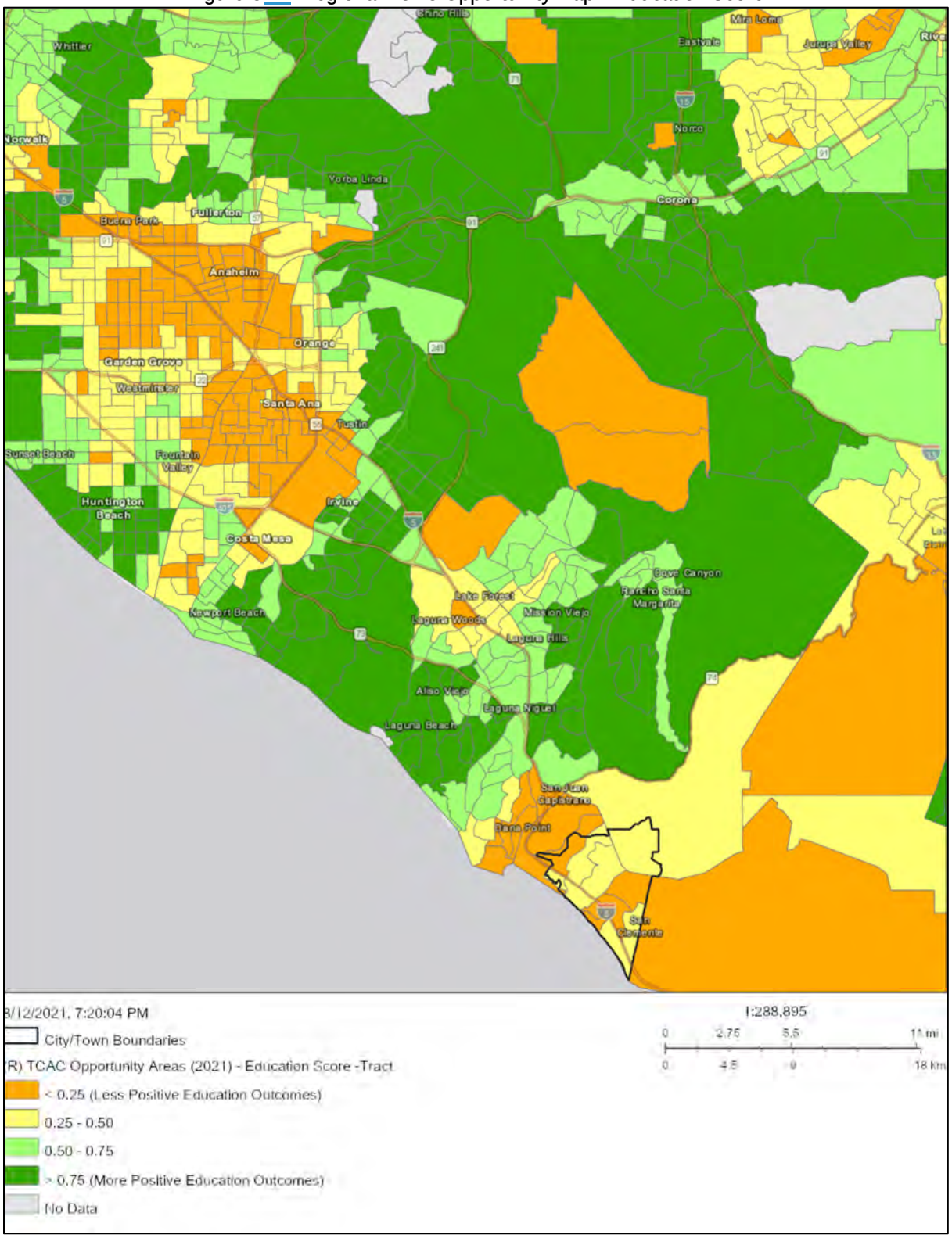
Regional Trend

Figure C-22 shows education scores for tracts the Orange County region. Tracts with lower education scores are most concentrated in the northern and central areas of Orange County near Anaheim, Garden Grove, and Santa Ana, and in the southern County near Dana Point, San Clemente, and San Juan Capistrano. Most tracts in these areas have education scores below 0.50. Coastal areas and most tracts on the eastern side of the City generally scored higher for education.

Local Trend

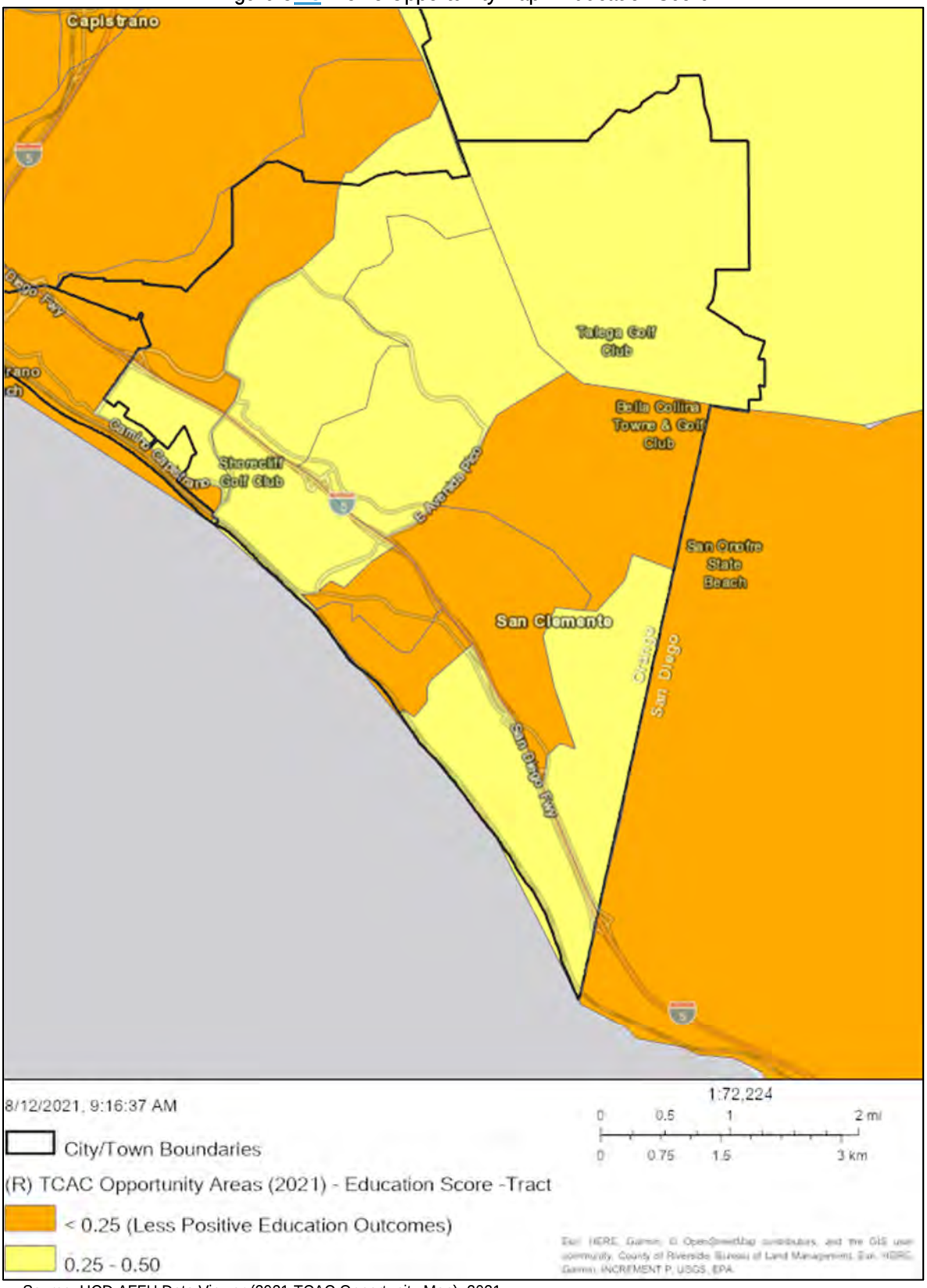
As shown in Figure C-23, all tracts received education scores of 0.50 or below. Four tracts in the center of the City and one tract in the northwestern corner received education scores in the lowest quartile. These tracts contain block groups with higher racial/ethnic minority and LMI concentrations and one tract is considered a low resource area (see Figure C-4, Figure C-10, and Figure C-13). San Clemente as a whole generally received the lowest marks for education, compared to the TCAC economic and environmental domains.

Figure C-22: Regional TCAC Opportunity Map – Education Score



Source: HCD AFFH Data Viewer (2021 TCAC Opportunity Map), 2021.

Figure C-23: TCAC Opportunity Map – Education Score



Source: HCD AFFH Data Viewer (2021 TCAC Opportunity Map), 2021.

Environmental

The Fair Housing Task Force uses CalEnviroScreen 3.0 pollution indicators and values to establish environmental scores. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Refer to Table C-17 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend

In general, tracts east of Interstate 5 received lower environmental scores compared to the western side. Most tracts on the western side, from San Clemente to Garden Grove, scored 0.25 or higher for environmental conditions (Figure C-24). The southern County areas, including Laguna Beach, Rancho Santa Margarita, and San Clemente, and the Huntington Beach area have the highest concentration of tracts with environmental scores in the top percentile. The northeastern County areas, including Fullerton, Orange and Yorba Linda, and tracts along the eastern County boundary are comprised of mostly tracts with environmental scores in the lowest percentile.

Local Trend

As shown in Figure C-25, tracts in the southern section of the City, generally south of Avenida Pico, scored in the highest percentile for environmental outcomes, including the low resource tract (see Figure C-18). Tracts in the center of the City scored between 0.50 and 0.75 and tracts along the northern City boundary scored between 0.25 and 0.50. Two block groups in the northern tracts with lower environmental scores have racial/ethnic minority populations exceeding 20% (see Figure C-4).

While the fair housing task force uses CalEnviroScreen 3.0 scores to determine environmental domain scores, OEHHA has released an updated CalEnvrioScreen map in 2021, CalEnviroScreen 4.0. CalEnviroScreen 4.0 scores are shown in Figure C-26. CalEnviroScreen 4.0 is the OEHHA's most updated California Communities Environmental Health Screening Tool used to identify communities that are disproportionately burdened by multiple sources of pollution. CalEnviroScreen 4.0 scores are based on percentiles (the percentage of all ordered CalEnviroScreen scores that fall below the score for that area). All tracts in San Clemente scored within the 40th percentile, with most of the City scoring between the 11th and 20th percentile. One area on the western side of the City scored slightly lower (31st to 40th percentile). This area has also been identified as a low resource area with higher concentrations of racial/ethnic minorities and LMI households and lower proportions of children living in married couple households (see Figure C-4, Figure C-10, Figure C-13, and Figure C-19).

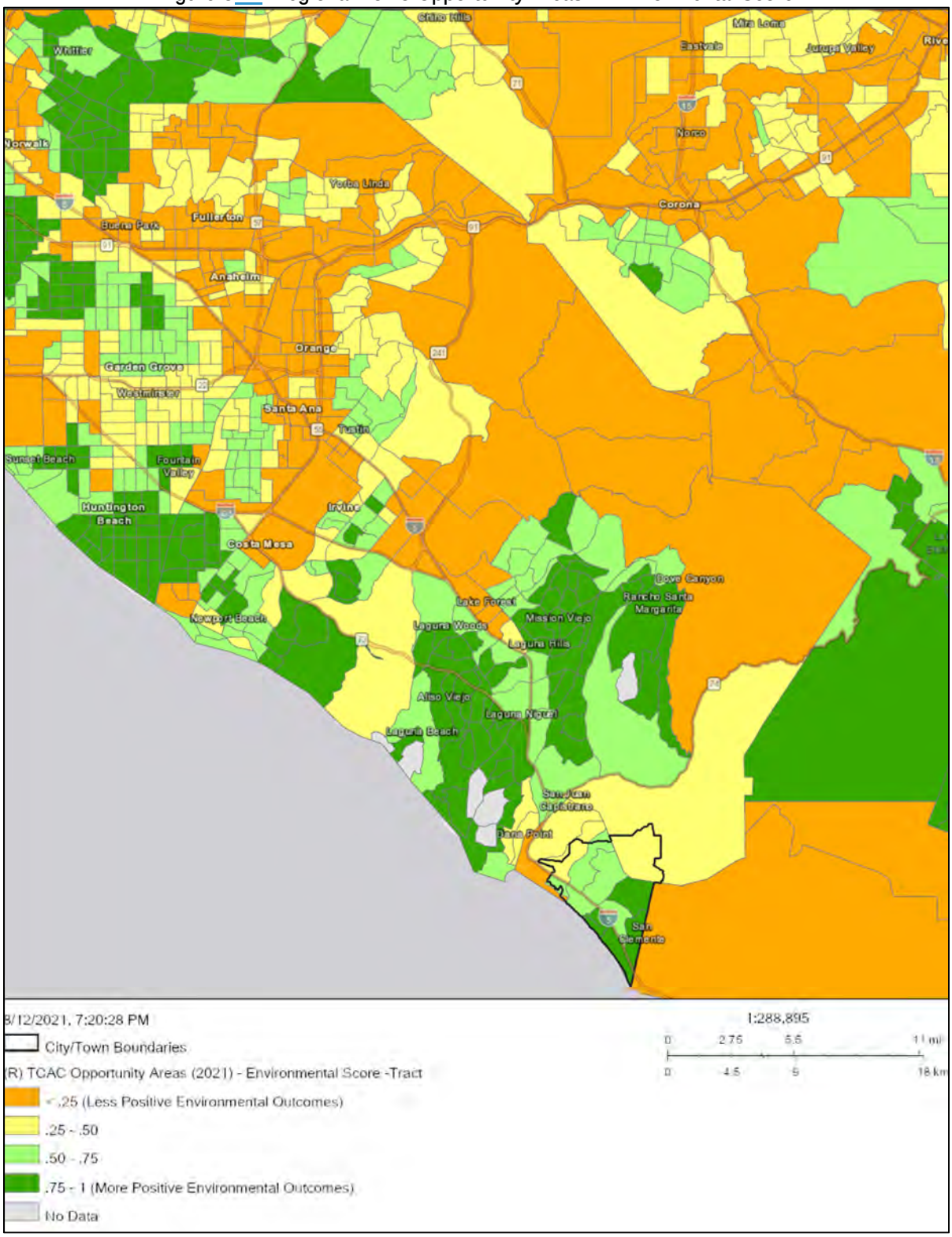
Sites Inventory

As shown in Table C-20, a higher proportion of lower income RHNA units (46.2%) are in 31st to 40th percentile tracts compared to moderate income units (26.5%) and above moderate income units (2.8%). Conversely, 39% of lower income units are in 1st to 10th percentile tracts, compared to 32% of above moderate income units and no moderate income units. Overall, 28.3% of units are in 1st to 10th percentile tracts, 45.8% are in 11th to 20th percentile tracts, and 25.9% are in 31st to 40th percentile tracts.

Table C-20: Distribution of RHNA Units by CalEnviroScreen 4.0 Percentile

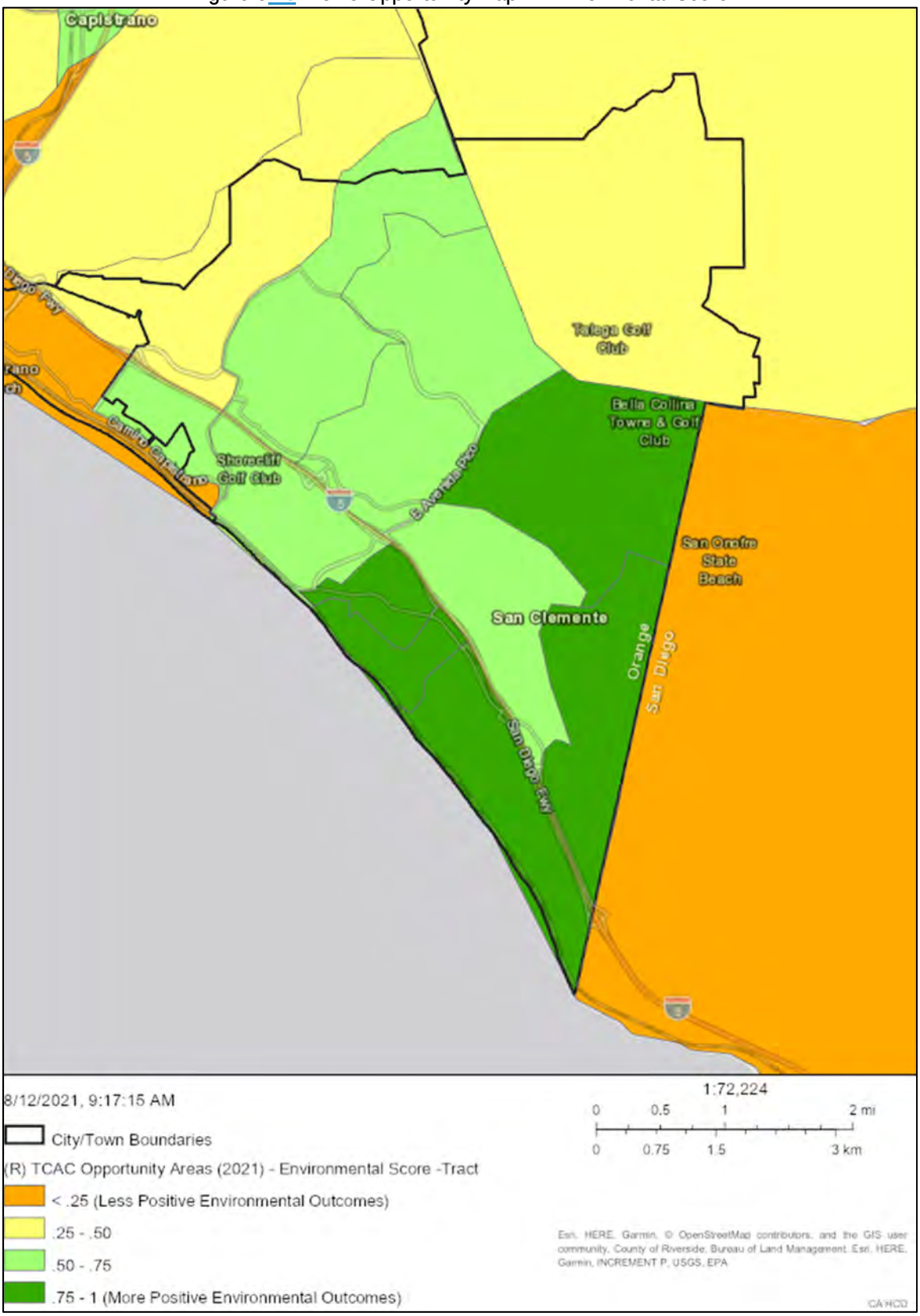
CalEnviroScreen 4.0 Percentile (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
1-10%	295	39.0%	0	0.0%	215	32.0%	510	28.3%
11-20%	112	14.8%	275	73.5%	437	65.1%	824	45.8%
21-30%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
31-40%	349	46.2%	99	26.5%	19	2.8%	467	25.9%
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Figure C-24: Regional TCAC Opportunity Areas – Environmental Score



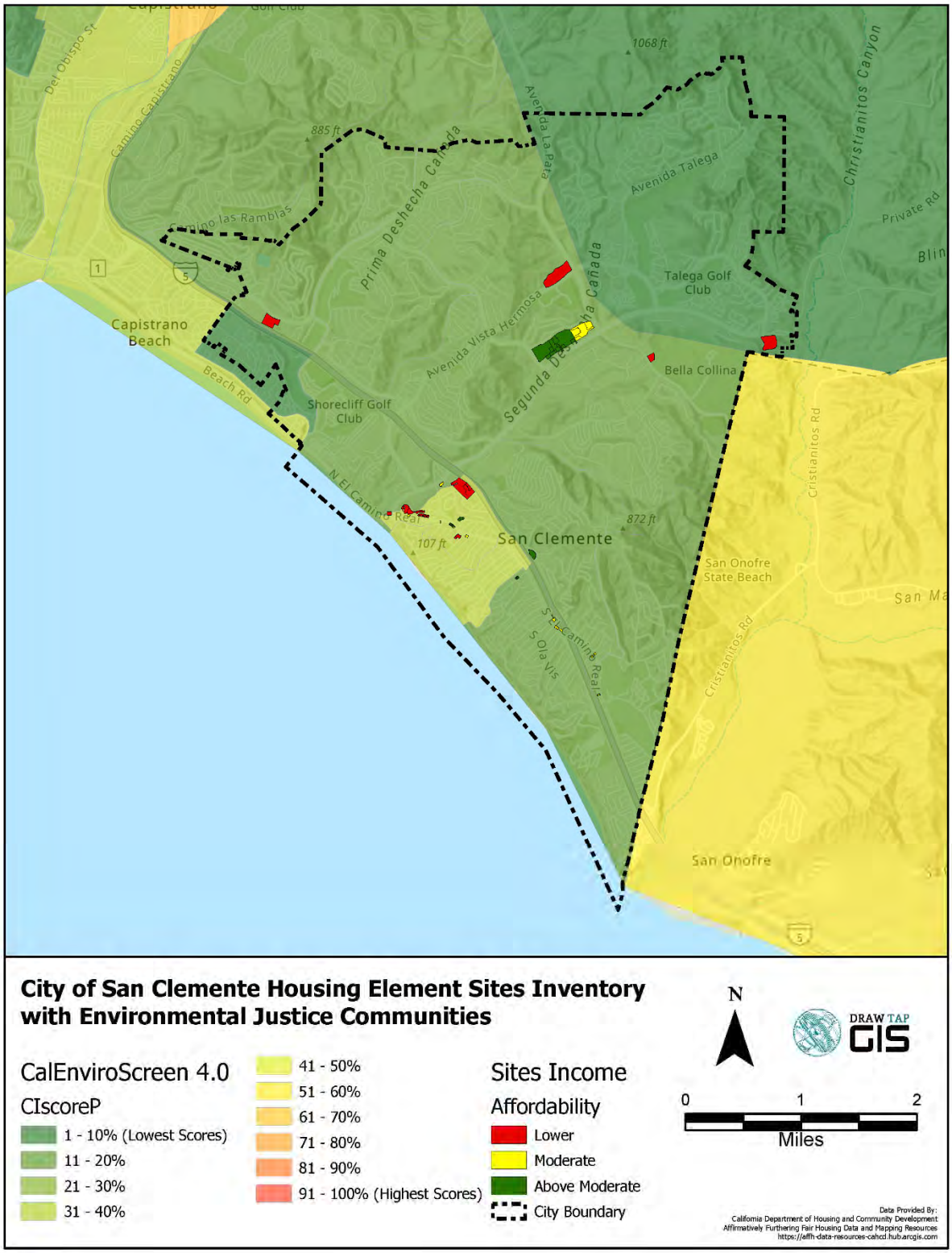
Source: HCD AFFH Data Viewer (2021 TCAC Opportunity Map), 2021.

Figure C-25: TCAC Opportunity Map – Environmental Score



Source: HCD AFFH Data Viewer (2021 TCAC Opportunity Map), 2021.

Figure C-26: CalEnviroScreen 4.0 Percentile Scores by Tract



Source: HCD AFFH Data Viewer (CalEnviroScreen 4.0), 2021.

Transportation

HUD's Job Proximity Index, shown in Table C-16 previously, can be used to show transportation need geographically. The Job's Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Areas (CBSA), with larger employment centers weighted more heavily. Block groups with lower jobs proximity indices are located further from employment opportunities and have a higher need for transportation.

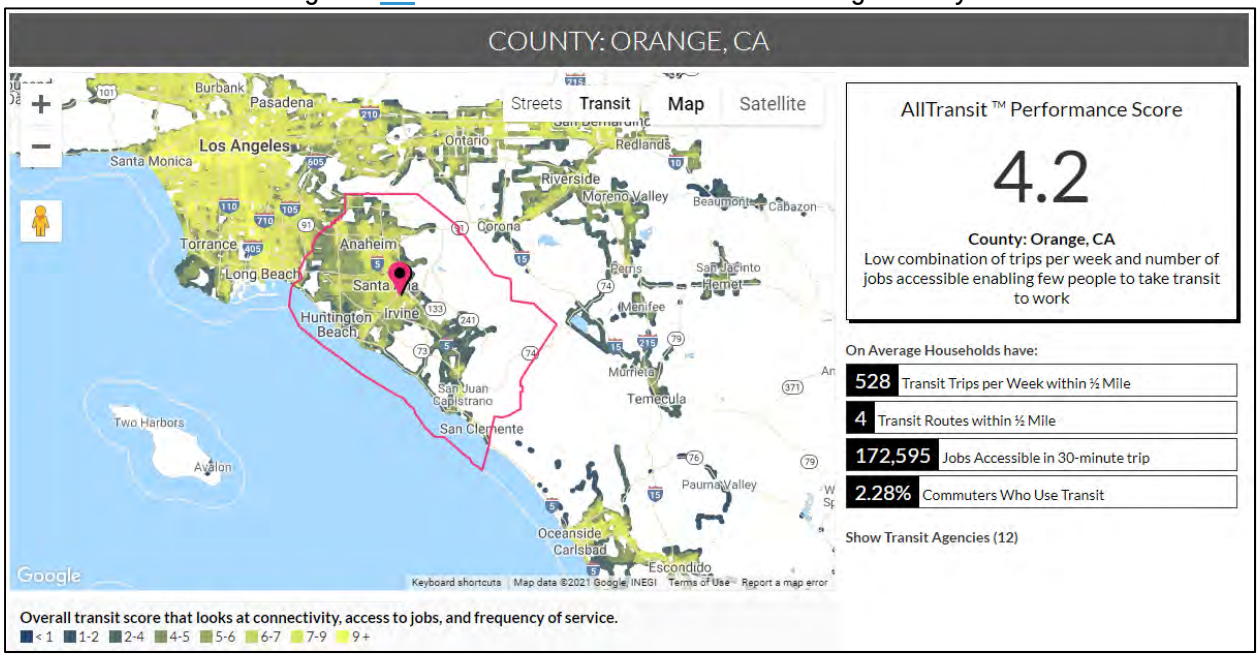
Regional Trend

The All Transit Performance Score explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the most recent data posted (2019), Orange County has an AllTransit Performance Score of 4.2 (out of 10), indicating a low combination of trips per week and number of jobs accessible by transit (Figure C-27).

As shown in Figure C-29, areas closest to employment opportunities in Orange County are most concentrated around Newport Beach, Costa Mesa, Irvine, and Orange. Jobs Proximity index scores progressively decrease moving further away from this area. Garden Grove, Buena Park, Huntington Beach, and many of the southern County areas including Dana Point and Rancho Santa Margarita are all located furthest from employment opportunities.

Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. SCAG developed a mapping tool for High Quality Transit Areas (HQTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. Garden Grove, Anaheim, Fullerton, Santa Ana, Costa Mesa, and the surrounding areas are all considered HQTAs. There is currently one small HQTA in San Clemente, located along the western City boundary (Figure C-31).

Figure C-27: AllTransit Performance Score – Orange County

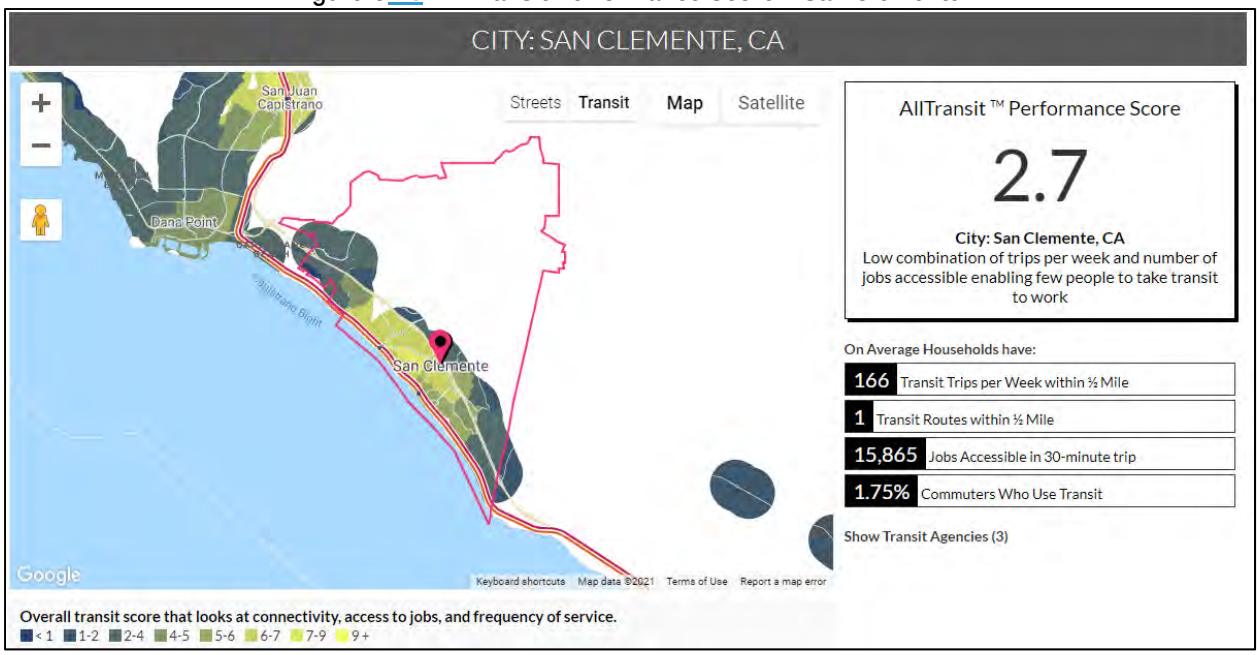


Source: AllTransit Metrics – Orange County, 2019

Local Trend

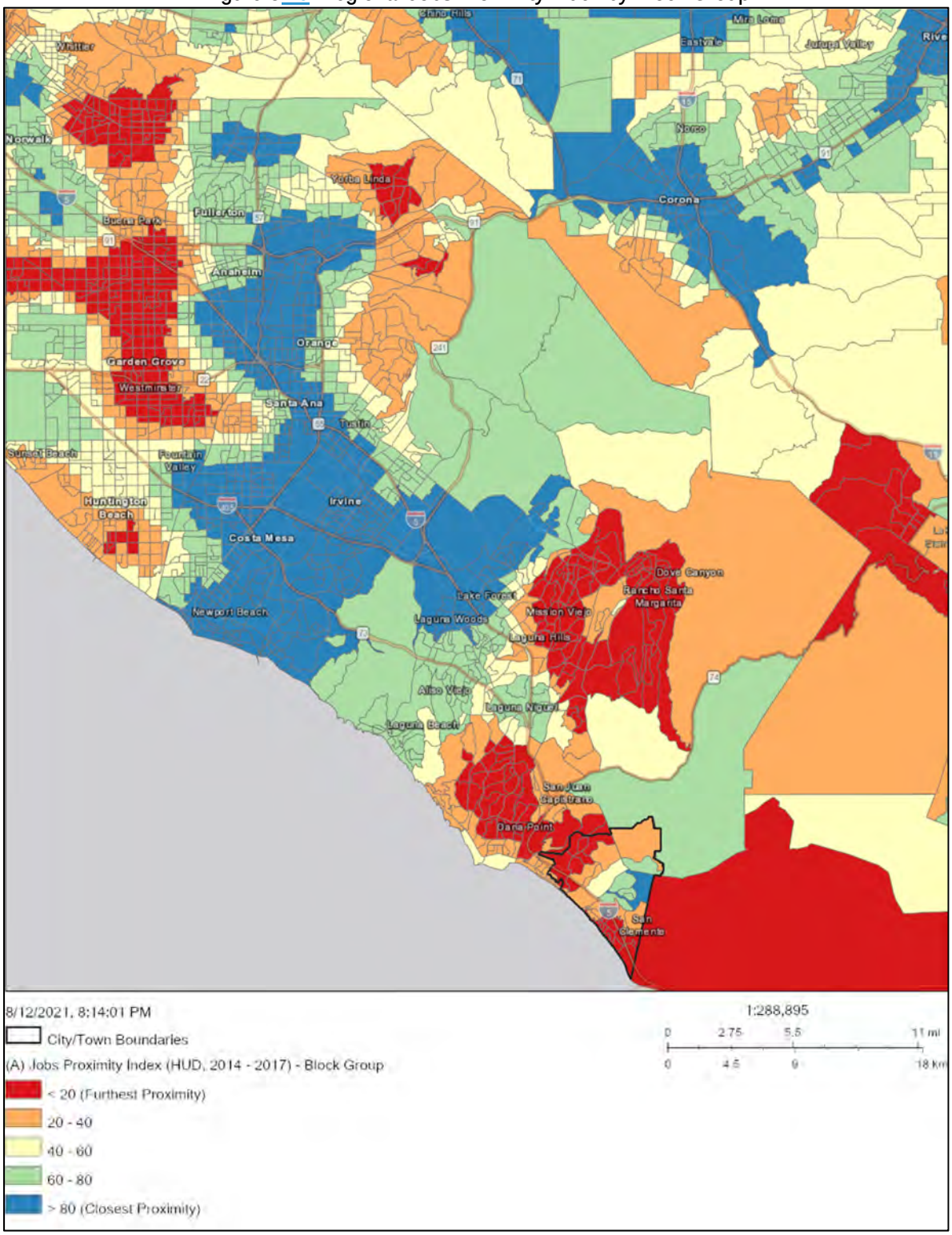
According to All Transit, San Clemente has a performance score of 2.7, significantly lower than the County (Figure C-28). Jobs are generally not accessible by transit in San Clemente. As shown in Figure C-30, employment opportunities are less accessible to communities in the southern and northwestern areas of San Clemente. A small group of block groups in the central eastern section of the City received higher jobs proximity scores, but a majority of the City scored below 40. While the central area of the City along the western border has low job proximity indices (tracts 421.07 and 421.08), the only two existing transit stations in the City are located within these tracts (see Figure C-43). Transit stations and other facilities, including hospitals and industrial sites, are further described in Section C.2.5 , *Disproportionate Housing Needs: Displacement.*

Figure C-28: AllTransit Performance Score – San Clemente



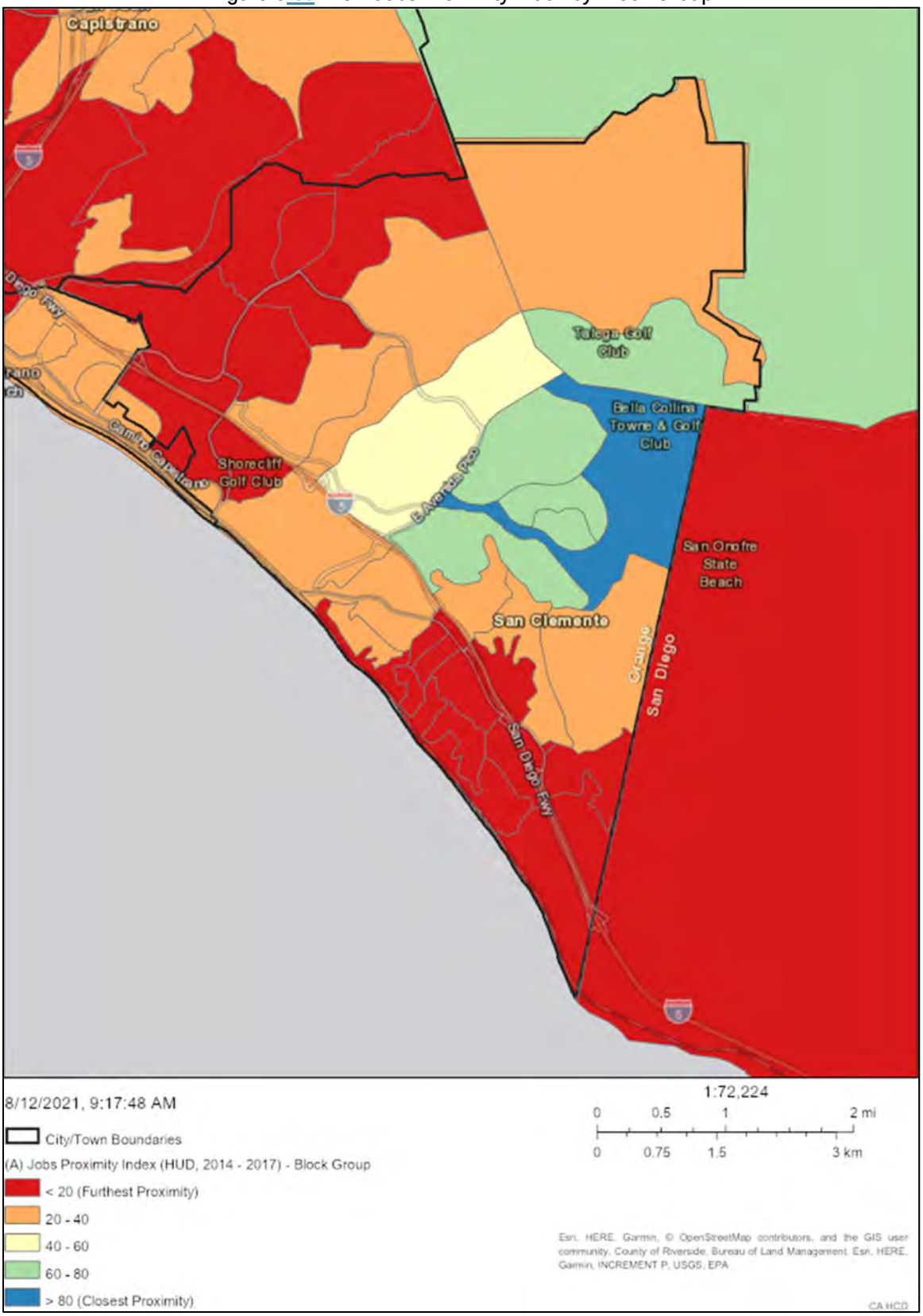
Source: AllTransit Metrics – Orange County, 2019

Figure C-29: Regional Jobs Proximity Index by Block Group



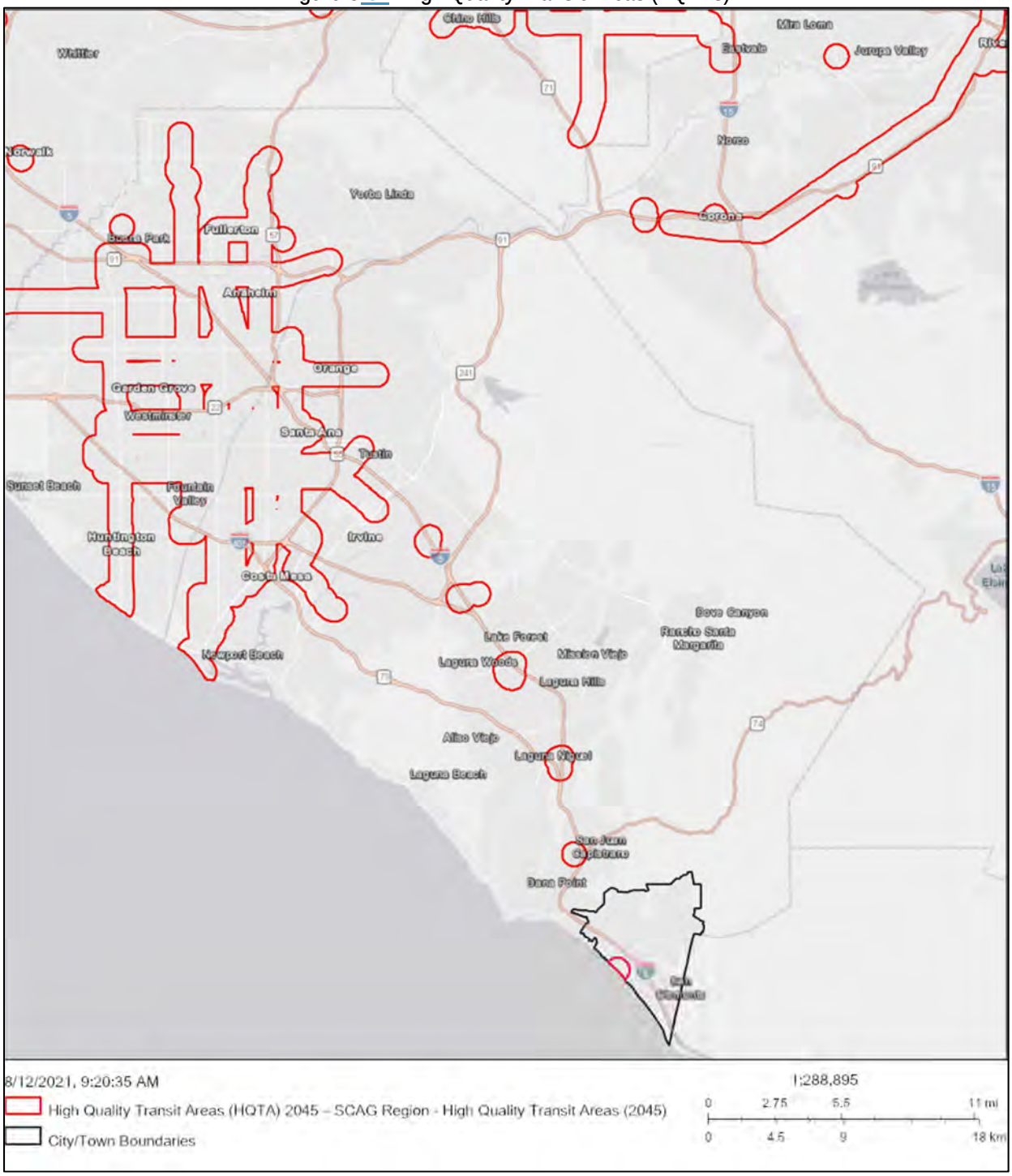
Source: HCD AFFH Data Viewer (HUD 2014-2017), 2021.

Figure C-30: HUD Jobs Proximity Index by Block Group



Source: HCD AFFH Data Viewer (HUD 2014-2017), 2021.

Figure C-31: High Quality Transit Areas (HQTAs)



Source: HCD AFFH Data Viewer (CalEnviroScreen 4.0), 2021.

Summary of Fair Housing Issues

According to HUD opportunity index scores, Black, Hispanic, and Native American communities in San Clemente were more likely to be impacted by poverty, and Hispanic communities had the lowest labor force participation and had the least access to employment opportunities. San Clemente is comprised of all TCAC designated moderate resource areas and one low resource area. The low resource tract also has

higher concentrations of racial/ethnic minority populations, LMI households, and persons below the poverty level (see Figure C-4, Figure C-13, and Figure C-16). Over 50% of lower income RHNA units are in the low resource tract compared to only 6% of moderate income units and 3% of above moderate income units. This tract received economic and education scores in the lowest quartile and lower CalEnviroScreen 4.0 percentile scores. Most of the City has limited transportation opportunities.

C.2.5 Disproportionate Housing Needs

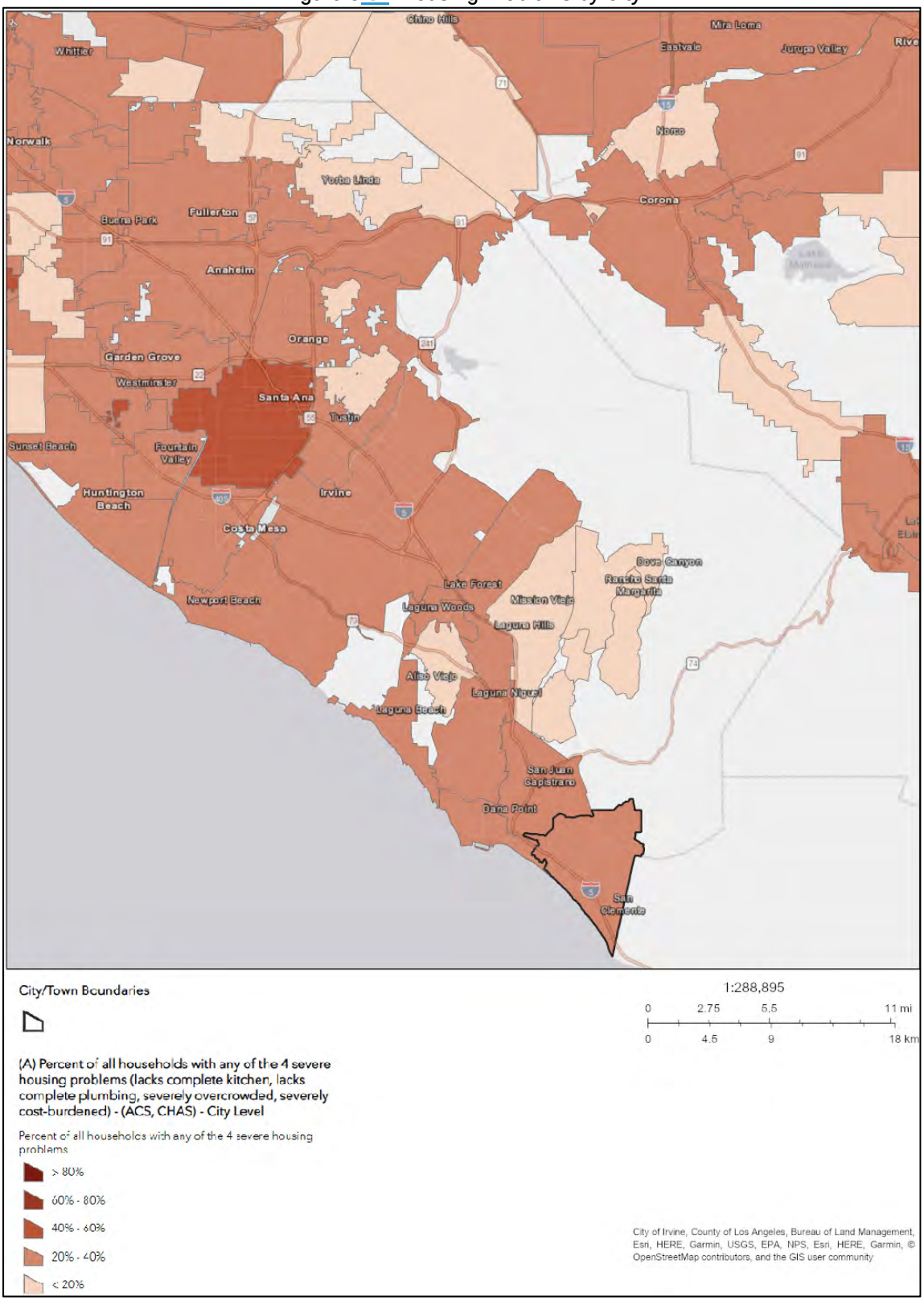
The AFFH Rule Guidebook defines disproportionate housing needs as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population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

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in San Clemente. Housing problems considered by CHAS include:

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

According to CHAS data based on the 2013-2017 ACS, the proportion of San Clemente households with one or more housing problem (42.5%) is comparable to Orange County as a whole (45.3%). In both jurisdictions, housing problems are more common amongst renter households compared to owner households. As shown in Figure C-32, between 20% and 40% of households have one or more housing problem in most cities in Orange County. Santa Ana has a higher concentration of households with a housing problem ranging from 40% to 60%.

Figure C-32: Housing Problems by City



Source: HCD AFFH Data Viewer (2020 HUD CHAS), 2021.

Cost Burden

Approximately 40.6% of households in San Clemente are cost burdened, nearly identical to the County where 40.5% of households are cost burdened. Cost burden in more common amongst renter-occupied households than owner-occupied households. Approximately 33.6% of owner households in San Clemente and 31.4% in the County are cost burdened, compared to 53.9% of renter households in San Clemente and 52.8% in the County.

Table C-21 breaks down households in San Clemente by race or ethnicity and presence of housing problems including cost burden. Pacific Islander non-Hispanic households were most likely to experience a housing problem including cost burden. Hispanic households also experienced housing problems at a higher rate than White non-Hispanic, Black non-Hispanic, and Asian non-Hispanic households. Approximately 58% of Pacific Islander households and nearly 50% of Hispanic households experienced a cost burden over 30%. In comparison, only 42% of all households experienced one or more housing problems including cost burden.

Table C-21: Housing Problems by Race/Ethnicity

Race or Ethnicity	Cost Burden >30%		With 1 or More Housing Problems		Total Households
	Total	Percent	Total	Percent	
White, non-Hispanic	7,820	39.9%	8,020	41.0%	19,580
Black or African American, non-Hispanic	35	20.0%	35	20.0%	175
Asian, non-Hispanic	175	21.2%	215	26.1%	825
American Indian or Alaska Native, non-Hispanic	0	0.0%	0	0.0%	30
Pacific Islander, non-Hispanic	95	57.6%	95	57.6%	165
Hispanic or Latino	1,545	49.1%	1,750	55.6%	3,145
Other (including 2 or more races), non-Hispanic	300	46.9%	325	50.8%	640
Total	9,970	40.6%	10,425	42.5%	24,565

Source: HUD CHAS data (2013-2017 ACS), August 2020.

Figure C-33 compares overpaying owners by census tract using the 2010-2014 and 2015-2019 ACS. The proportion of overpaying owners has decreased or remained the same in all tracts since the 2010-2014 ACS. Between 20% and 60% of homeowners in all tracts experience cost burden. More owners are cost burdened in tracts along the western and southern City boundaries, and in the tract in the northeast corner of the City.

Cost burdened renters over time are presented in Figure C-34. The proportion of cost burdened renters has increased in some tracts but decreased in others. Fewer than 20% of renters in one tract in the northern section of the City are cost burdened, but 20% to 80% of renters in all other San Clemente tracts are cost burdened. Tracts with the highest concentration of overeating renters (between 60% and 80%) are located along the eastern City boundary, in the central northern section of the City, and in the northwestern corner.

A majority of lower income RHNA units are in tracts where between 40 and 60% of owners are cost burdened, while a majority of moderate and above moderate units are in tracts where only 20 to 40% of owners are cost burdened. Conversely, 59.9% of moderate income units and 57.7% of above moderate income units are in tracts where 60 to 80% of renters are cost burdened compared to only 11.9% of lower

income units. Most lower income units are in tracts where only 40 to 60% of renters overpay for housing. Although San Clemente is a high cost burden for both renters and owners, the potential rezone sites help alleviate the existing disproportions by identifying sites suitable for lower income households in less cost burdened areas.

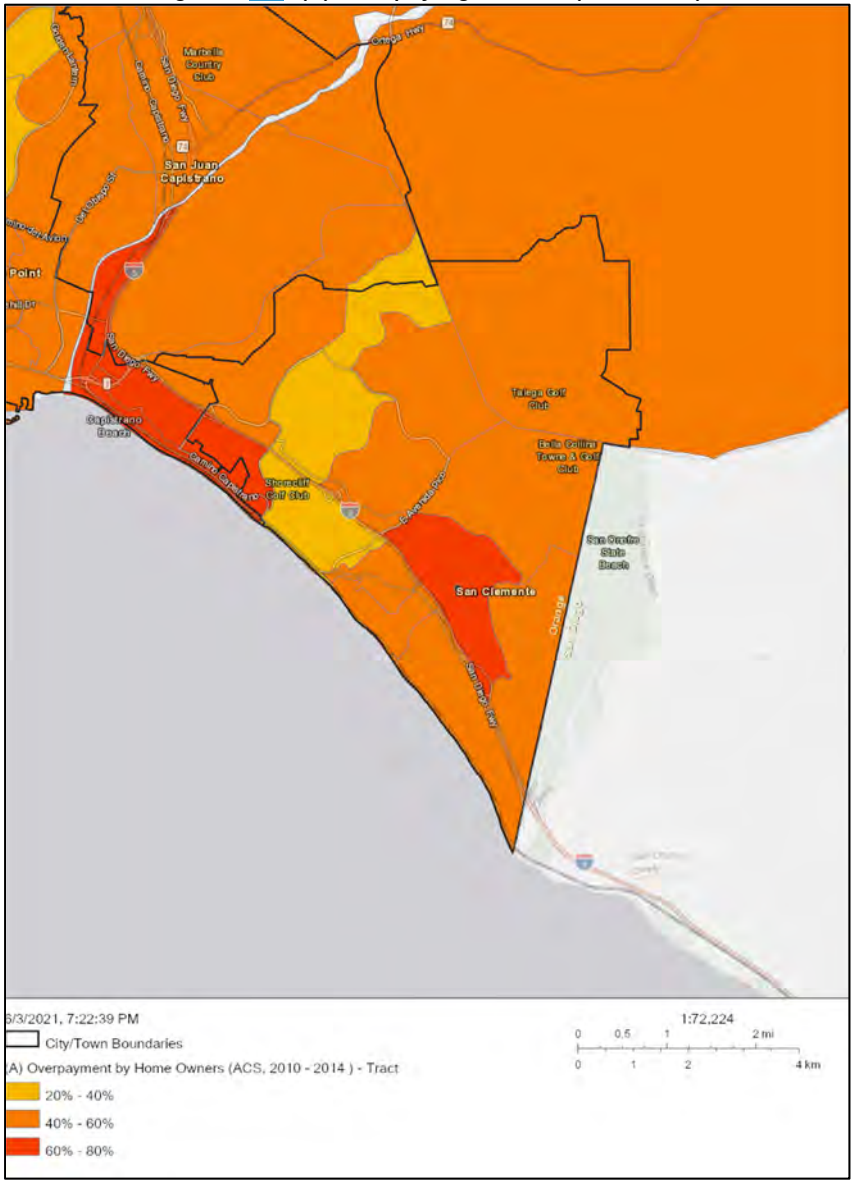
Table C-22: Distribution of RHNA Units by Cost Burdened Owners

Cost Burdened Owners (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
20-40%	114	15.1%	222	59.4%	602	89.7%	938	52.1%
40-60%	642	84.9%	152	40.6%	69	10.3%	863	47.9%
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Table C-23: Distribution of RHNA Units by Cost Burdened Renters

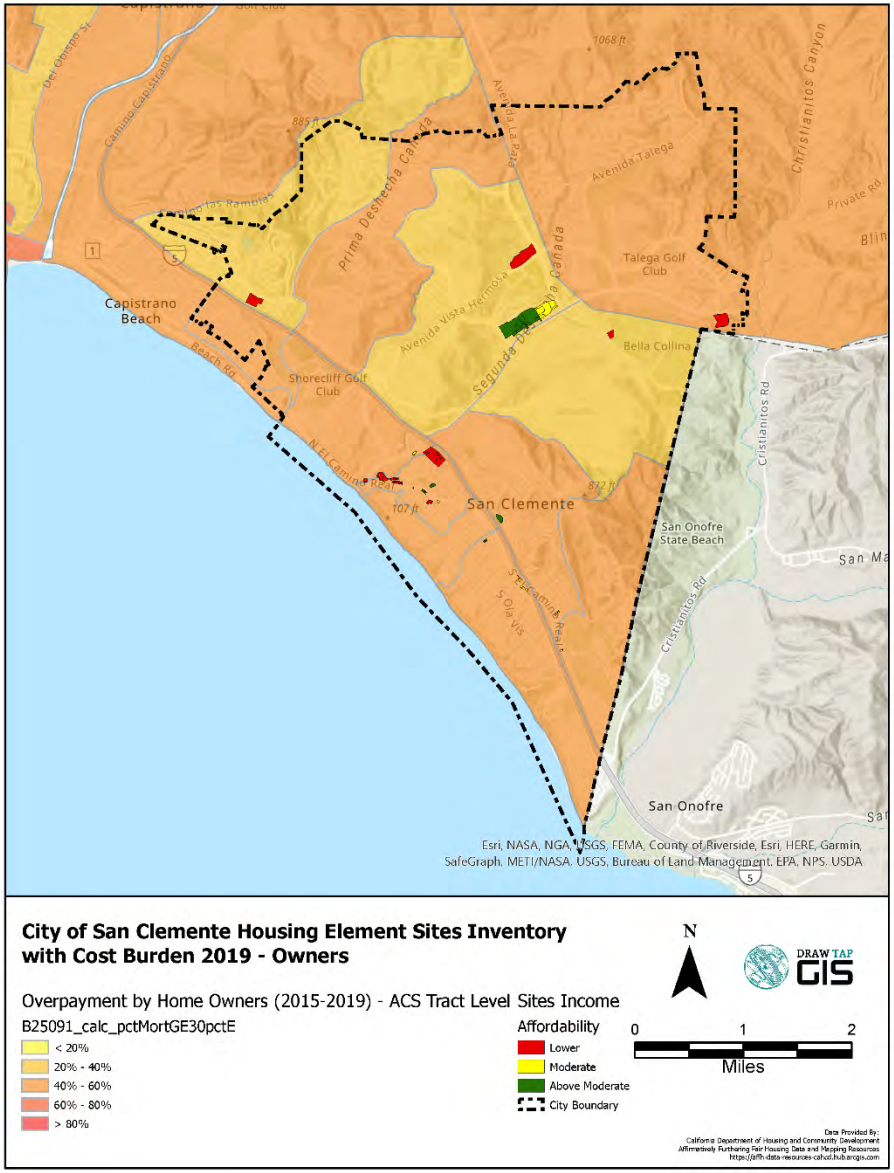
Cost Burdened Renters (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
20-40%	22	2.9%	18	4.8%	42	6.3%	82	4.6%
40-60%	644	85.2%	132	35.3%	242	36.1%	1,018	56.5%
60-80%	90	11.9%	224	59.9%	387	57.7%	701	38.9%
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Figure C-33: (A) Overpaying Owners (2010-2014)



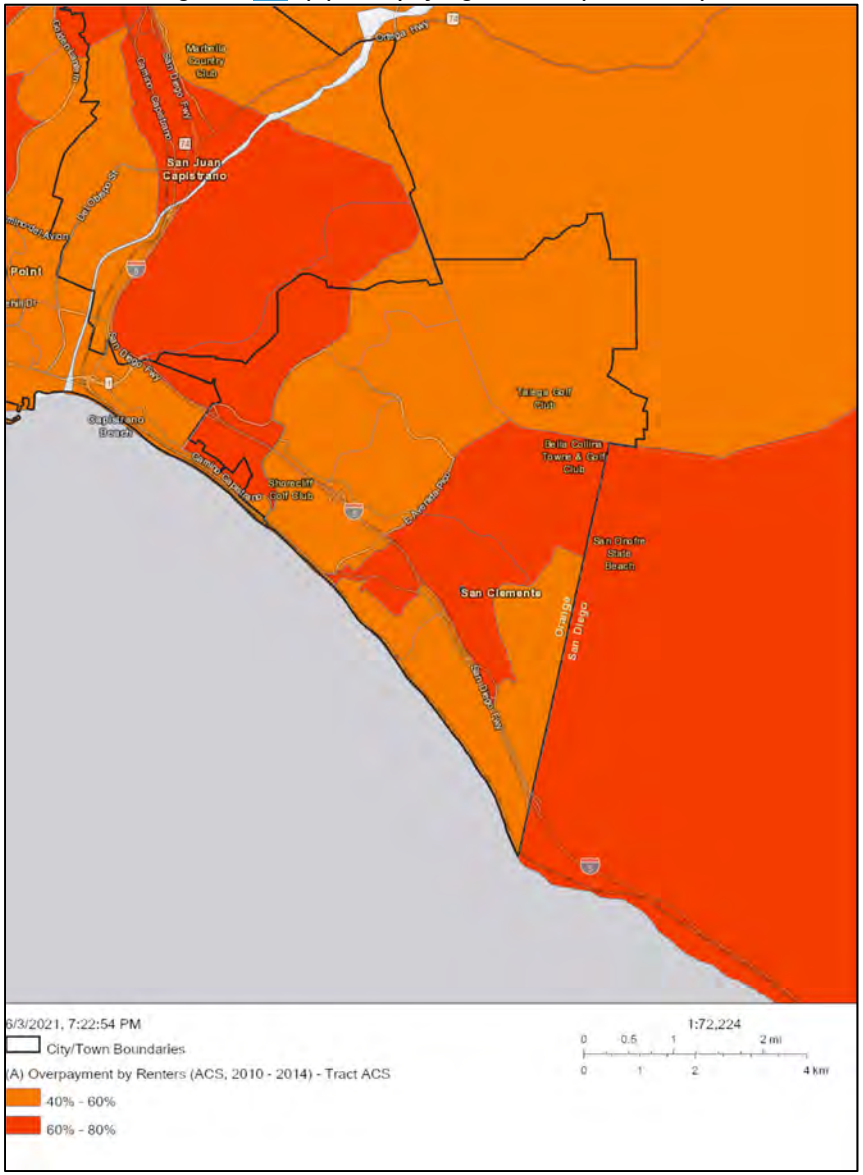
Source: HCD AFFH Data Viewer (2010-2014 ACS), 2021.

(B) Overpaying Owners (2015-2019)



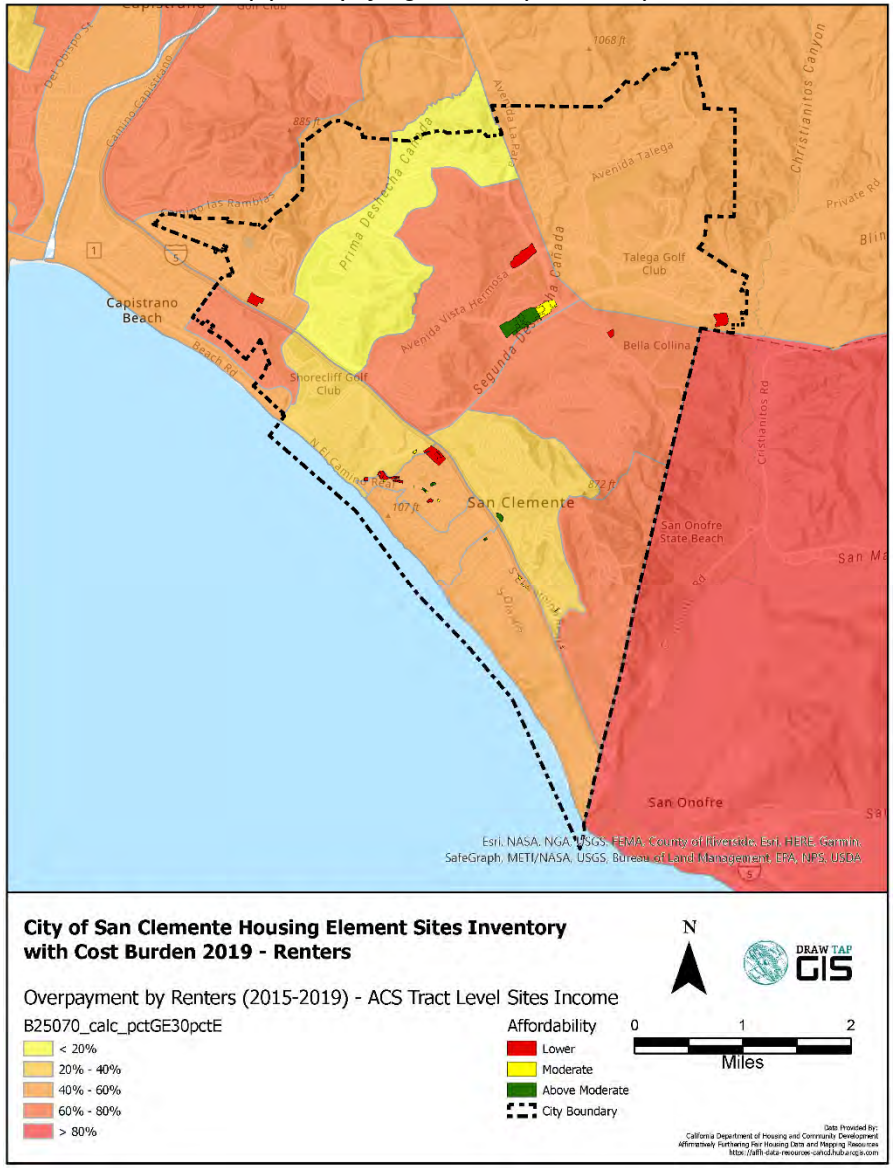
Source: HCD AFFH Data Viewer (2010-2014 ACS), 2021.

Figure C-34: (A) Overpaying Renters (2010-2014)



Source: HCD AFFH Data Viewer (2010-2014 ACS), 2021.

(B) Overpaying Renters (2015-2019)



Source: HCD AFFH Data Viewer (2010-2014 ACS), 2021.

Overcrowding

Overcrowding in most common in the northern and central areas of San Clemente around Garden Grove, Orange, Anaheim, and Santa Ana (Figure C-35). In the southern County areas, overcrowding is far less prevalent. In most tracts in southern Orange County, less than 8.2% (Statewide average) of households are overcrowded.

Overcrowding is generally not an issue in the City of San Clemente. According to 2020 HUD CHAS data based on the 2013-2017 ACS, there are no owner-occupied households of any income category that experience overcrowding. Further, there are no households that are severely overcrowded (over 1.5 persons per room). Table C-24 below shows overcrowded renter-occupied households. Only about 0.2% of renter-occupied households are overcrowded. Overcrowding is most common in higher income households but is generally not concentrated in one income category.

As presented in Figure C-36, there is only one tract with a concentration of overcrowded households exceeding the statewide average of 8.2%. Approximately 16.9% of households in this tract are overcrowded. As discussed previously, this tract is considered a low resource area. It also has higher concentrations of racial/ethnic minorities and LMI households, and lower concentrations of children in married couple households (see Figure C-4, Figure C-10, Figure C-13, and Figure C-19). As discussed previously, a larger proportion of lower income units used to meet the 2021-2029 RHNA are located in this area. There are no tracts in San Clemente with severely overcrowded households.

Figure C-36 also shows the sites inventory used to meet the City's RHNA. Nearly half of the units used to meet the lower income RHNA are in the tract where 17% of households are overcrowded compared to only 26.5% of moderate income units and 2.8% of above moderate income units. A majority of moderate income (73.5%) and above moderate income (97.2%) units are in tracts were fewer than 8.2%, the Statewide average, of households are overcrowded. The potential rezone sites would help alleviate this disproportion by identifying sites suitable for lower income households in areas with lower rates of overcrowding.

Table C-24: Overcrowding by Income Category – Renter-Occupied Households

Income Category	Overcrowded (1-1.5 Persons per Room)		Total Renter Households
	Total	Percent	
0-30% HAMFI	0	0.0%	1,560
31-50% HAMFI	0	0.0%	1,440
51-80% HAMFI	4	0.3%	1,520
81-100% HAMFI	0	0.0%	1,055
<100% HAMFI	10	0.4%	2,850
Total	14	0.2%	8,430

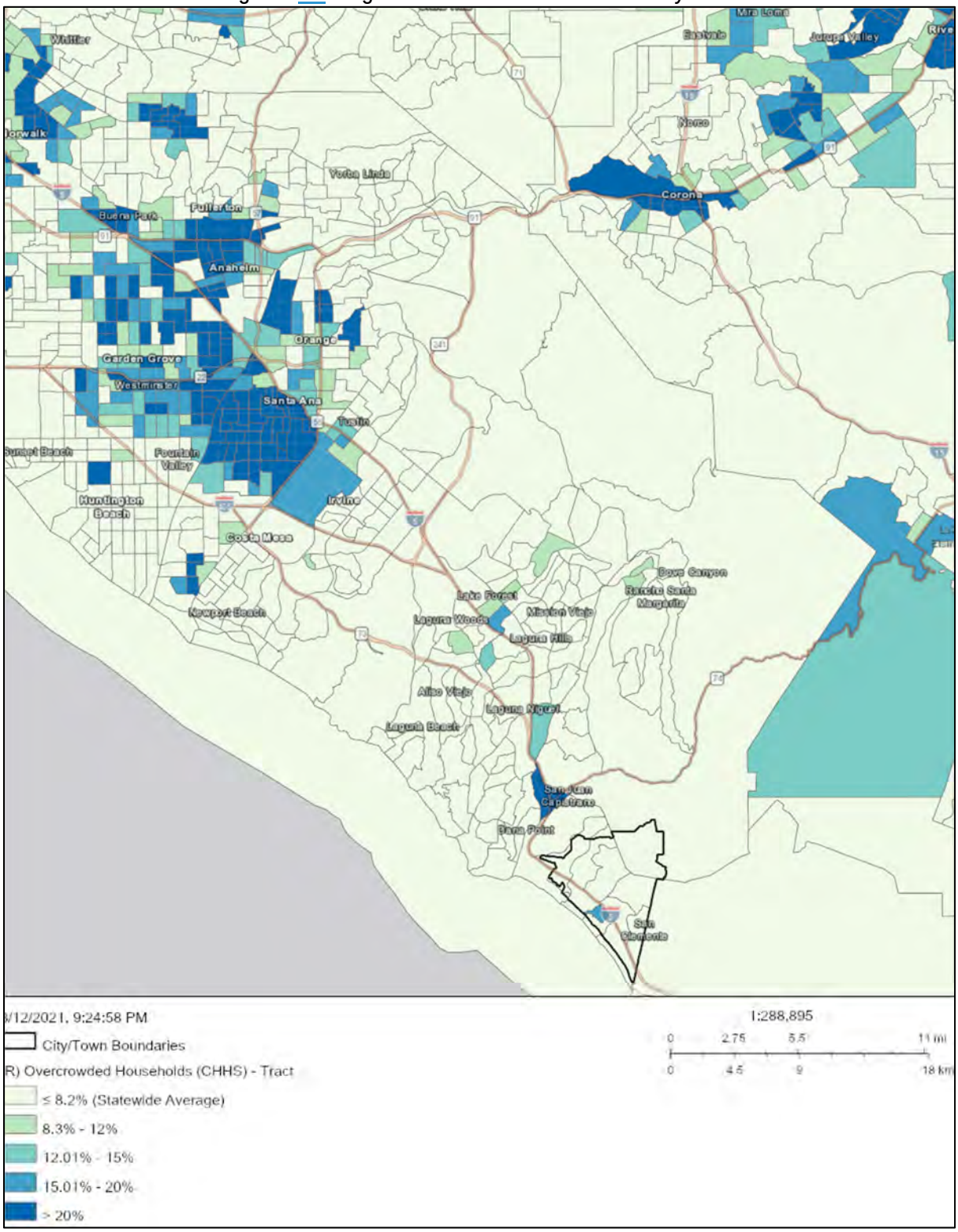
Source: HUD CHAS data (2013-2017 ACS), August 2020.

Table C-25: Distribution of RHNA Units by Overcrowded Households

Overcrowded Households (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
<8.2%	407	53.8%	275	73.5%	652	97.2%	1,334	74.1%
8.2-12%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
12-15%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
15-20%	349	46.2%	99	26.5%	19	2.8%	467	25.9%

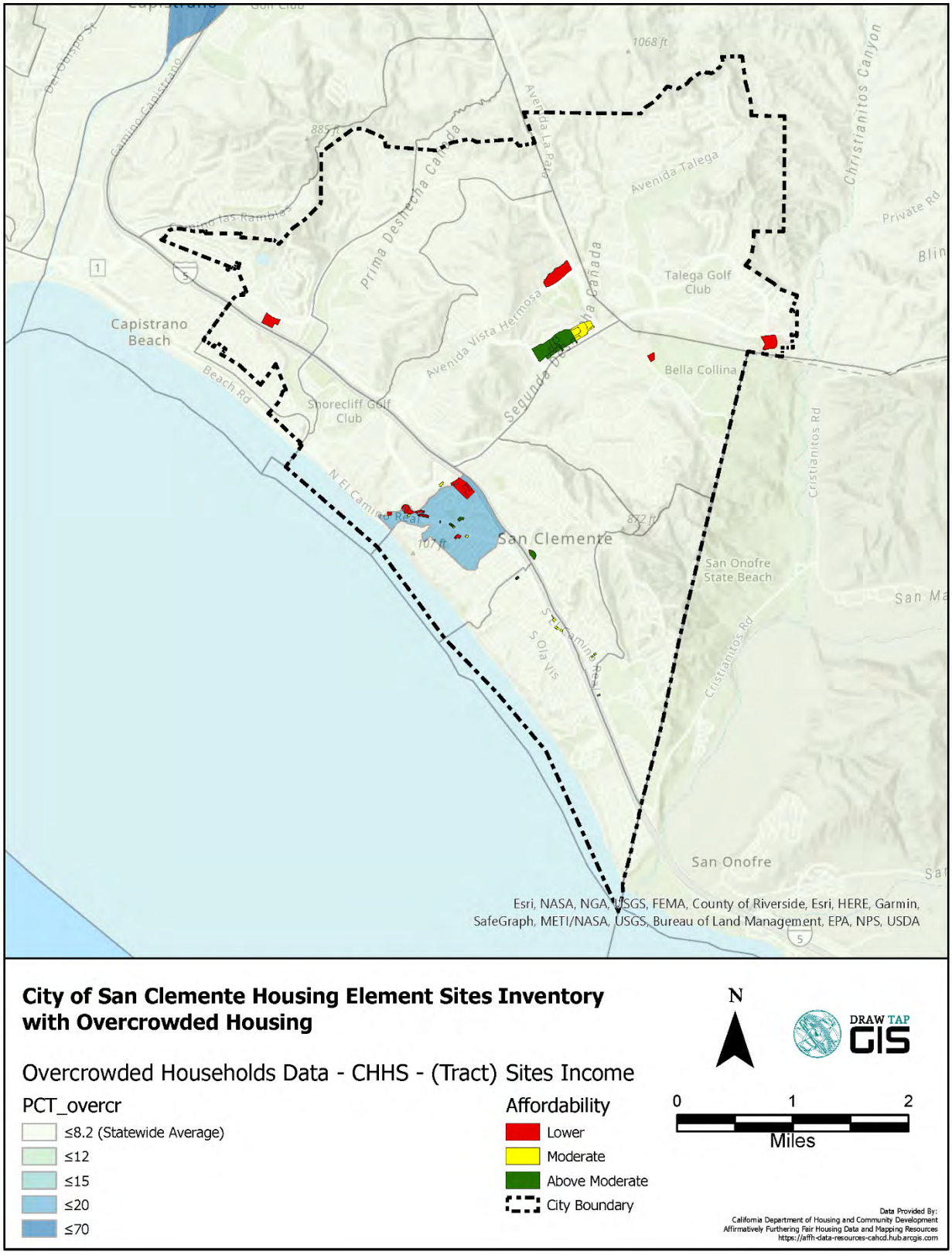
Total Units	756	100.0%	374	100.0%	671	100.0%	1,801	100.0%

Figure C-35: Regional Overcrowded Households by Tract



Source: HCD Data Viewer (2020 HUD CHAS), 2021.

Figure C-36: Overcrowded Households by Tract



Source: HCD Data Viewer (2020 HUD CHAS), 2021.

Substandard Housing

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. In San Clemente, 0.5% of owner-occupied households lack complete plumbing or kitchen facilities. There are no renter households that lack complete plumbing facilities, but 5.4% of renter-occupied households lack compete kitchen facilities. In comparison, only 0.2% of owner-occupied households lack complete plumbing facilities and 0.3% lack complete kitchen facilities Countywide. Similarly, only 2.5% of renter-occupied households Countywide lack complete kitchen facilities.

Table C-26: Substandard Housing Conditions

Income Category	Owner-Occupied		Renter -Occupied		Total
	Total	Percent	Total	Percent	
San Clemente					
Lacking complete plumbing facilities	79	0.5%	0	0.0%	79
Lacking complete kitchen facilities	79	0.5%	408	5.4%	487
Orange County					
Lacking complete plumbing facilities	1,394	0.2%	1,455	0.3%	2,849
Lacking complete kitchen facilities	1,674	0.3%	10,857	2.5%	12,531

Source: ACS 2014-2018 (5-Year Estimates).

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs.

As shown in Table C-27, 26.5% of housing units in San Clemente are older than 50 years, compared to 37.1% Countywide. Tracts 421.06 and 421.07 have the highest concentration of housing units built in 1969 or earlier. As shown in Figure C-37, these tracts are located in the northwestern corner of the City. Tract 421.07 is considered a low resource area and has a higher concentration of racial/ethnic minorities and LMI households and a lower proportion of children in married couple households (see Figure C-4, Figure C-10, Figure C-13, and Figure C-19). Tracts 320.23 and 421.12, located in the northern and northeastern areas have the largest proportion of new housing built in 1990 or later.

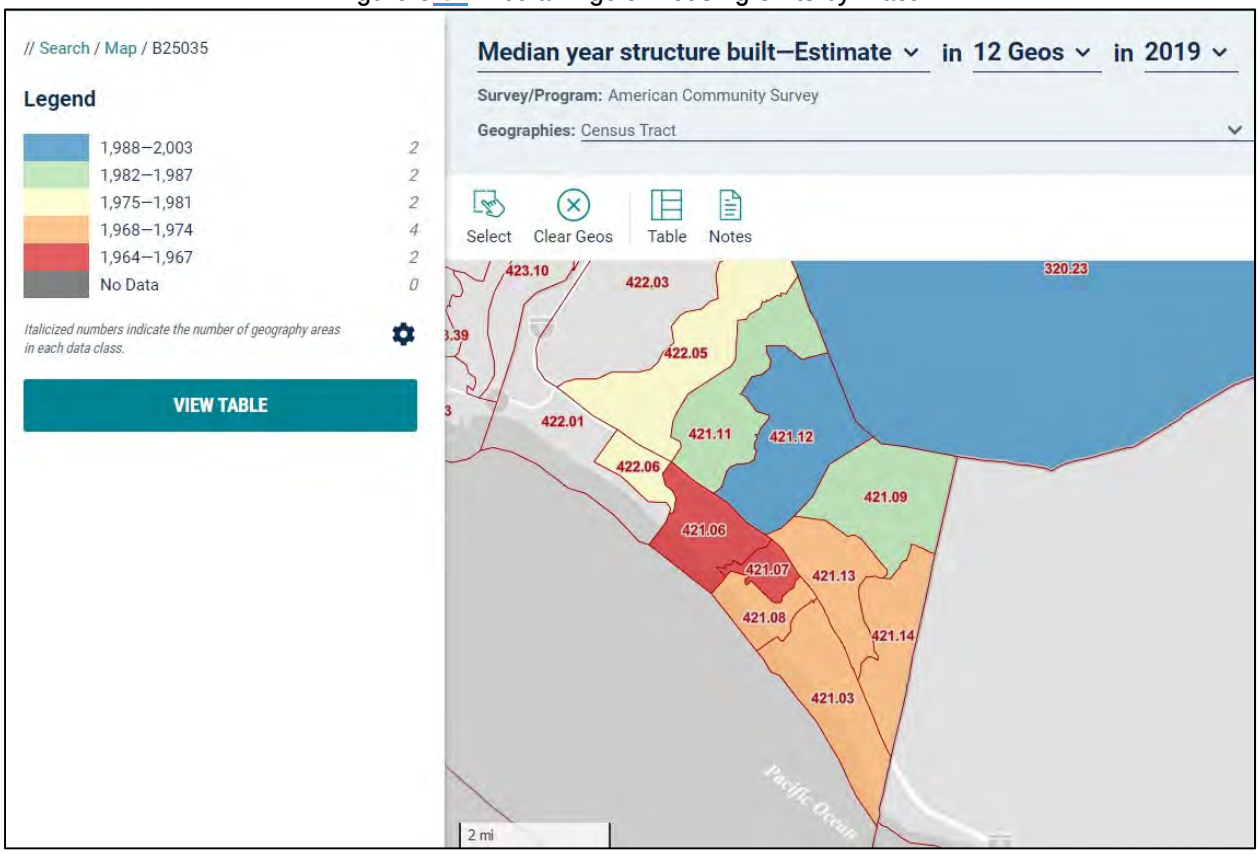
Table C-27: Housing Unit Age

Tract/Jurisdiction	Year Built			Total Housing Units
	1969 or Earlier (50+ Years)	1970-1989 (30-40 Years)	1990 or Later (<30 Years)	
320.23	3.0%	13.1%	83.9%	5,160
421.03	49.0%	42.0%	9.0%	3,571
421.06	72.1%	13.8%	14.0%	1,026
421.07	67.9%	26.8%	5.3%	1,590
421.08	45.9%	46.5%	7.6%	3,349
421.09	4.9%	59.7%	35.4%	2,258
421.11	2.5%	64.0%	33.4%	2,335
421.12	3.1%	37.9%	59.0%	2,424
421.13	42.9%	49.3%	7.7%	2,039
421.14	32.7%	58.6%	8.7%	1,791

422.05	23.0%	52.1%	24.9%	2,739
422.06	7.0%	79.0%	14.0%	1,617
San Clemente	26.5%	42.4%	31.1%	27,885
Orange County	37.1%	38.2%	24.7%	1,100,449

Source: 2015-2019 ACS (5-Year Estimates).

Figure C-37: Median Age of Housing Units by Tract



Source: 2015-2019 ACS (5-Year Estimates).

Displacement Risk

UC Berkley's Urban Displacement project defines residential displacement as "the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control." As part of this project, the research has identified populations vulnerable to displacement (named "sensitive communities") in the event of increased redevelopment and drastic shifts in housing cost. They defined vulnerability based on the share of low income residents per tract and other criteria including: share of renters is above 40 percent, share of people of color is more than 50 percent, share of low income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps.

Regional Trend

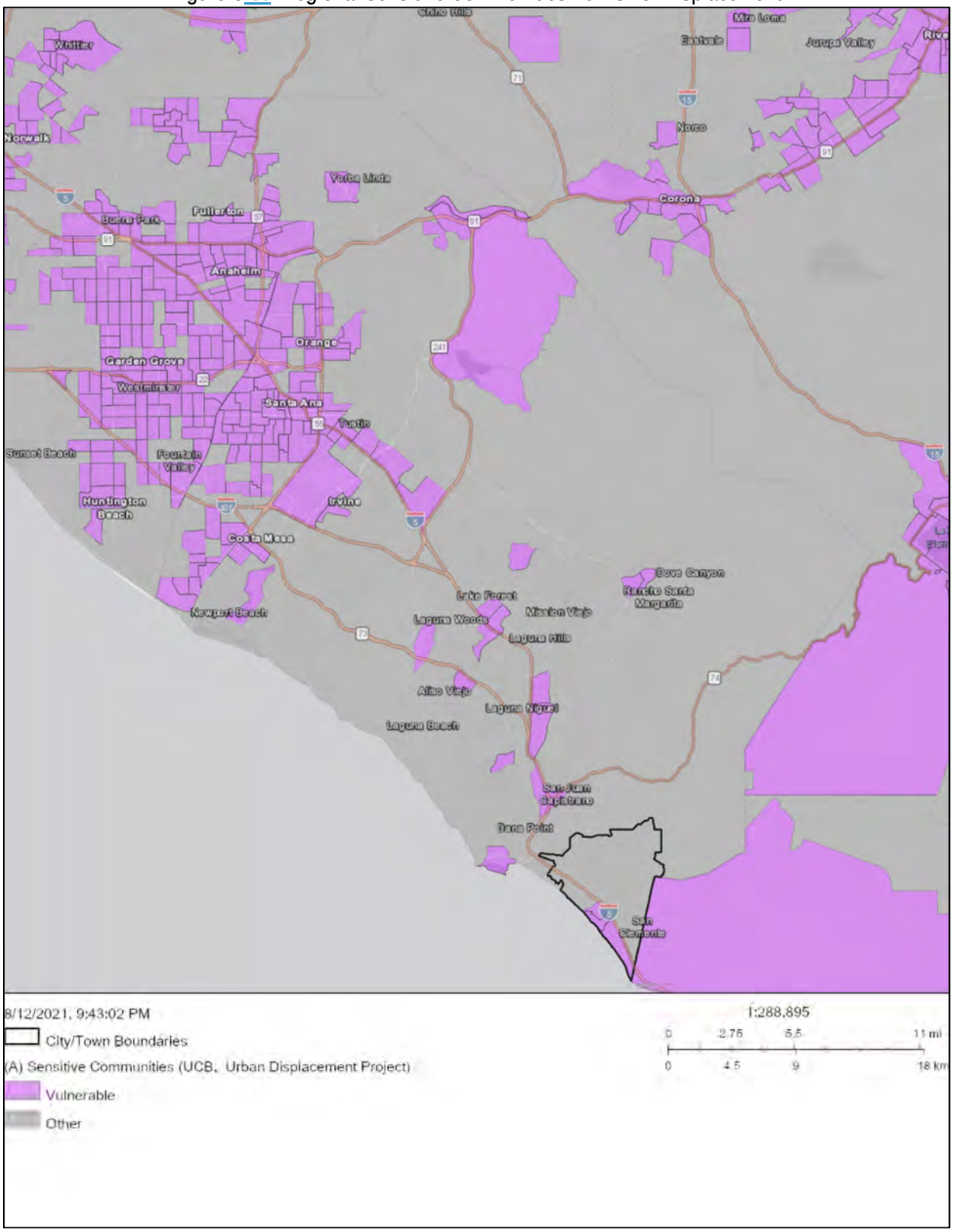
As shown in Figure C-38, there are many communities identified as vulnerable to displacement in Orange County, but sensitive communities are most concentrated in the central and northern County around Garden Grove, Anaheim, Santa Ana, and Orange. Sensitive communities have also been identified in the

southern County region, Laguna Woods, Rancho Santa Margarita areas, but at a far lower density than the northern and central regions.

Local Trend

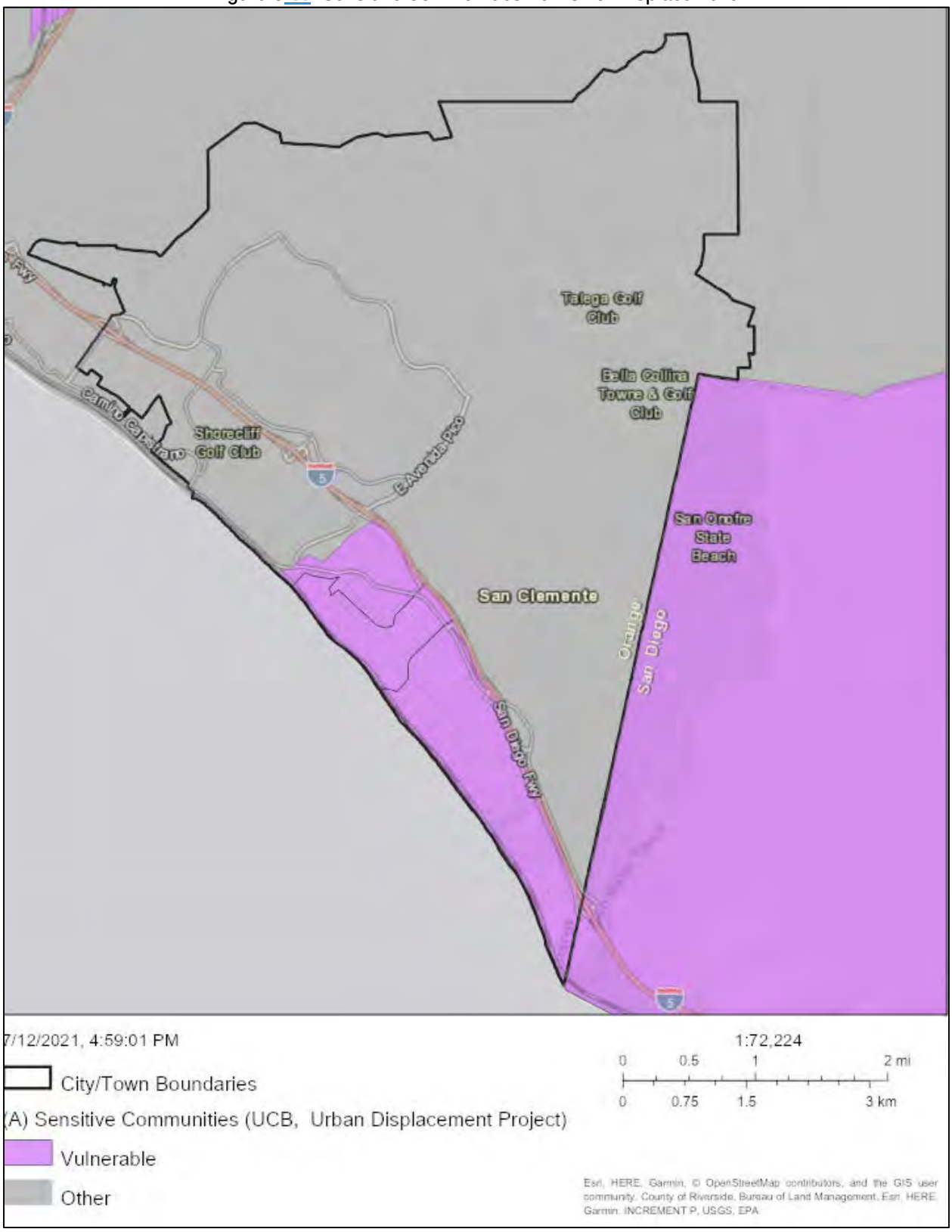
HCD has identified three sensitive communities in San Clemente located along the southwestern City boundary (Figure C-39). These communities have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. The identified vulnerable communities also have higher concentrations of racial/ethnic minorities, LMI households, cost burdened owners, and aging housing units, and lower concentrations of children in married couple households (see Figure C-4, Figure C-10, Figure C-13, Figure C-33, and Figure C-37). One tract is categorized as a low resource area and has a larger proportion of overcrowded households (see Figure C-19 and Figure C-36).

Figure C-38: Regional Sensitive Communities At Risk of Displacement



Source: HCD AFFH Data Viewer (2020 Urban Displacement Project), 2021.

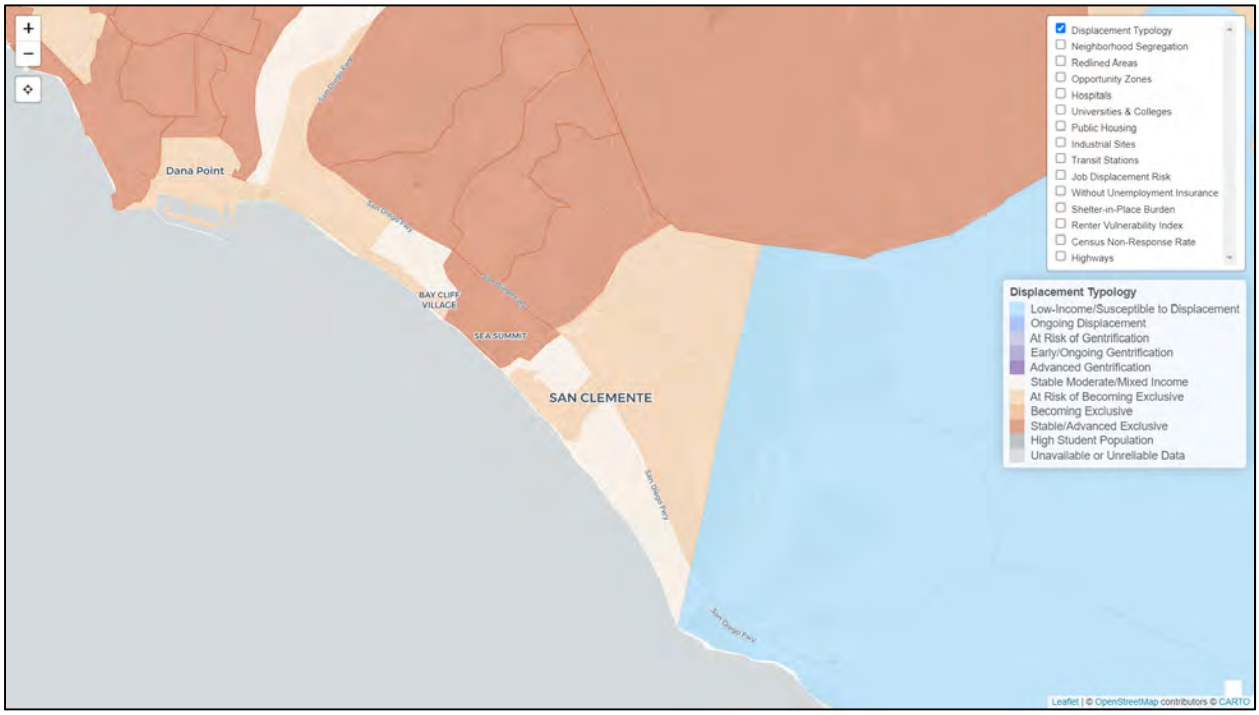
Figure C-39: Sensitive Communities At Risk of Displacement



Source: HCD AFFH Data Viewer (2020 Urban Displacement Project), 2021.

As shown in Figure C-40, most coastal areas in San Clemente are defined as "Stable Moderate/Mixed Income," northern areas are considered "Stable/Advanced Exclusive," and the remainder of the City is "At Risk of Becoming Exclusive." Stable Moderate/Mixed Income tracts are defined as moderate, mixed moderate, mixed high, or high income tracts in 2018; Stable/Advanced Exclusive tracts are defined as high income tracts in 2000 and 2018 affordable to mixed high-income households in 2018 with marginal change or increase in housing costs; At Risk of Being Exclusive tracts are defined as moderate or high income tracts in 2018 with housing affordable to middle and high income levels and marginal increases in housing costs. The Stable/Advanced Exclusive communities tend to have higher median incomes and lower concentrations of LMI households. In all but one block group in these communities, less than 40% of the population belongs to a racial or ethnic minority. There are no communities in San Clemente that are defined as "Low-Income/Susceptible to Displacement," "Ongoing Displacement," "Early/Ongoing Gentrification," or "Advanced Gentrification."

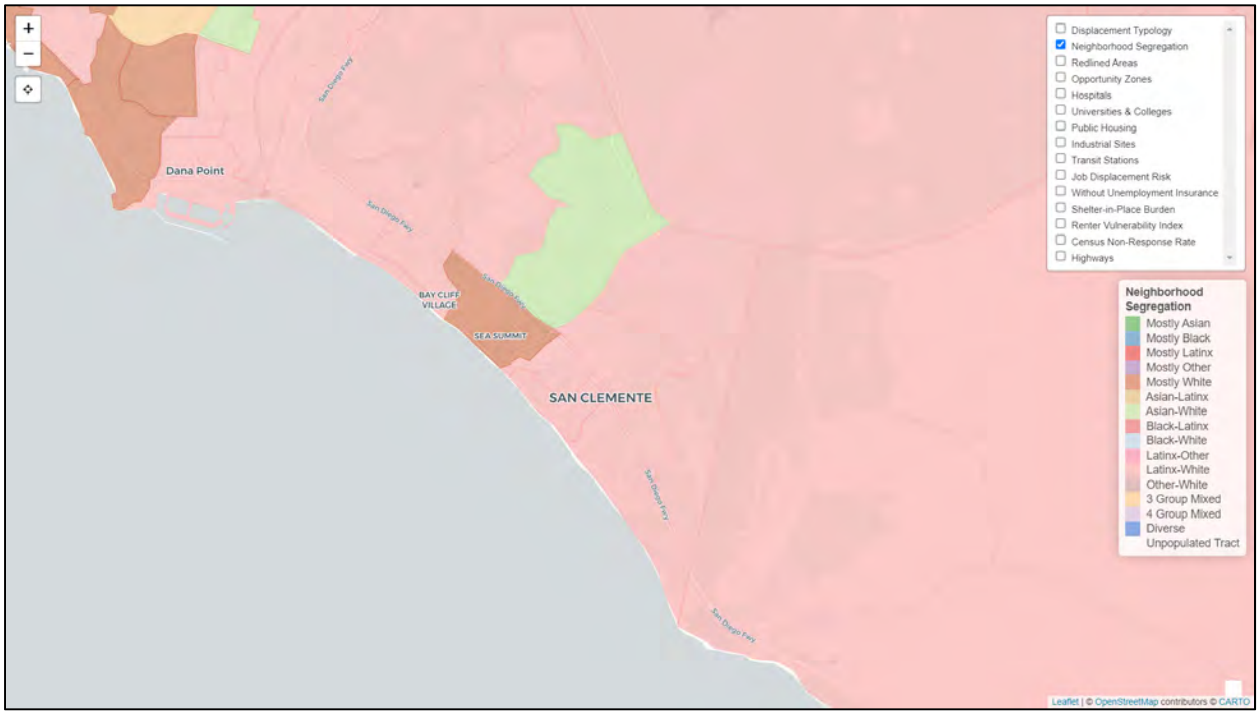
Figure C-40: Urban Displacement Project – Displacement Typology



Neighborhood Segregation. As discussed in Section C.2.2, *Integration and Segregation*, most areas in San Clemente have White majority populations. As shown in Figure C-41, most communities in San Clemente are defined by White-Latinx populations while the tract encompassing the Sea Summit community along the western City boundary is mostly White, and the tract in the central northern section of the City is Asian-White. The Asian-White areas have lower concentrations of LMI households and fewer overpaying owners, but a high concentration of overpaying renters. The mostly White tract has a population of

persons with disabilities exceeding 10% and contains one mobile home park. This tract has a moderate concentration of LMI households and a median income exceeding the State average.

Figure C-41: Urban Displacement Project – Neighborhood Segregation



Opportunity Zones. As part of the Tax Cuts and Jobs Act of 2017, the Opportunity Zone program grants preferential tax benefits to investments made in Qualified Opportunity Zones (QOZs) or "economically distressed areas" designated by the State governor. The program aims to encourage economic development in these communities. According to the Urban Displacement Project, "there is concern among community developers and advocates that the program contains insufficient safeguards for tenants and businesses in low-income neighborhoods susceptible to investment driven displacement."[15] There is one QOZ in San Clemente, also defined as a sensitive community at risk of displacement. This area has a larger Hispanic population than the remainder of the City. More than 50% of households in this tract are low or moderate income and it is the only TCAC-designated low resource area in the City. It is also the only tract with a concentration of overcrowded households (16.9% of households are overcrowded). There is one mobile home park located in this neighborhood (see Figure C-50). There are concentrations of fair housing issues related to segregation, access to opportunities, and disproportionate housing needs in San Clemente, specifically in tracts 421.07 and 421.08 located along the central western City boundary. Up to 5% of renters receive HCVs in these tracts. Additionally, these communities contain block groups with higher concentrations of racial/ethnic minority populations and LMI households. There are fewer children living in married couple households in this area and tract 421.08 has a larger percentage of householders living alone and persons below the poverty level. Tract 421.07 is categorized as a low

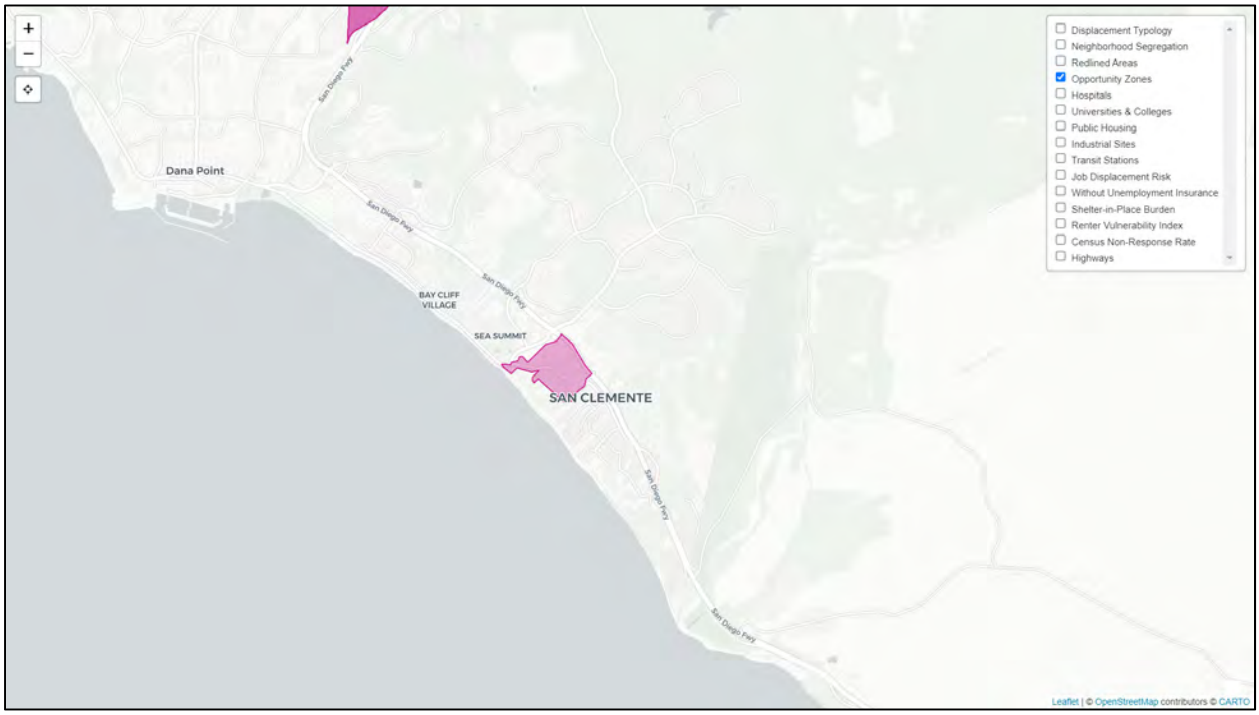
[15] The Strong, Prosperous, and Resilient Communities Challenge (SPARCC)/Urban Displacement Replication Project: A Modified Gentrification and Displacement Methodology for Atlanta, Chicago, Denver, and Memphis SPARCC, October 2020. https://www.urbandisplacement.org/wp-content/uploads/2021/08/udp_replication_project_methodology_10.16.2020-converted.pdf.

resource tract, the only low resource area in the City. Further, this area has worse CalEnviroScreen and jobs proximity index scores but are still at levels better than other tracts in Orange County. Tract 421.07 is also the only tract in the City with concentrations of overcrowded households exceeding the Statewide average of 8.2%. Housing units tend to be older in this section of the City and both tracts are considered sensitive communities at risk of displacement. In general, San Clemente has positive healthy places index scores throughout the City.

As shown in Figure C-51 there is one subsidized housing project and one mobile home park in these communities, which may contribute to the concentration of sensitive populations, as these housing types typically house lower income households. Figure C-51 also shows the Healthy Places Index (HPI) by tract. HPI uses community conditions, including housing, transportation, and environmental conditions, to predict life expectancy. It is relevant to note that three of the six subsidized housing projects are in the highest scoring HPI tracts (>80 percent) and two are in the second highest scoring tracts (60 to 80 percent). Tracts 421.07 and 421.08 have the lowest HPI scores in the City. According to the HPI, these tracts have most park access and retail density, but lower supermarket access (Figure C-51, Figure C-52, Figure C-53). These neighborhoods also have high employment rates but lower median incomes and fewer persons with college degrees (Figure C-54, Figure C-55, Figure C-56). Homeownership is also lower in these tracts and a significantly lower proportion of adults have health insurance (Figure C-57, Figure C-58). Tract 421.08 also has a larger population of non-English speakers compared to the remainder of the City (Figure C-59). Downtown San Clemente is located in tract 421.08, and likely has more lower paying retail and service jobs due to the concentration of retail and service employers in the area. According to the HPI, there is also a higher concentration of adults who work outdoors in these communities (Figure C-60).

Figure C-50).

Figure C-42: Urban Displacement Project – Opportunity Zones



Facilities and Resources. Figure C-43, below, shows hospitals (red), existing transit stations (blue), and industrial sites (gray). Accessibility transit stations is important in reducing displacement risk by ensuring

vulnerable populations have access to services and employment opportunities. Hospitals and universities/colleges, referred to as "anchor institutions," are included in the Urban Displacement Project mapping tool as they can add additional employment opportunities in the area but also attract higher income workers, thereby increasing housing prices.[16] The Urban Displacement Project includes industrial sites as "Industrial land can maintain disinvestment in a neighborhood, priming it either for gentrification pressures or disinvestment-induced displacement."[12] Two industrial sites, two transit stations, and one hospital have been identified in San Clemente. However, the Saddleback Memorial Medical Center identified below has been closed since 2016.

Both existing transit stations identified in San Clemente are located along the western City boundary. Both are located in areas with higher concentrations of non-White populations. The neighborhood containing the southern transit station is has a population of persons below the poverty level exceeding 10%, while the northern station tract is considered an LMI area. As discussed previously, this area also has more overcrowded households and is considered an QOZ and TCAC Low Resource area. Despite the accessible transit stations, this area has the highest concentration of sensitive communities in the City (non-White populations, LMI households, cost burdened households, overcrowded households). There is also one industrial site located in the aforementioned neighborhood.

Figure C-43: Urban Displacement Project – Hospitals, Industrial Sites, and Transit Stations

Job Displacement Risk. Job displacement risk was added to the Urban Displacement Project's methodology and mapping tool to identify neighborhoods with a disproportionately high number of retail and service-sector employees vulnerable to job displacement due to COVID-19. As shown in Figure C-44,

[16] The Strong, Prosperous, and Resilient Communities Challenge (SPARCC)/Urban Displacement Project: Building a National Narrative of Anti-Displacement Strategies, October 2020. https://www.urbandisplacement.org/wp-content/uploads/2021/08/building_a_national_narrative_october_2020-converted.pdf.

the southern coastal region of San Clemente has higher job displacement risk values, encompassing the QOZ, two transit stations, and one industrial site. This span of San Clemente also has larger non-White and LMI populations, lower median incomes, and more renter households. There is one mobile home park and one subsidized housing project in neighborhoods more vulnerable to job displacement risk.

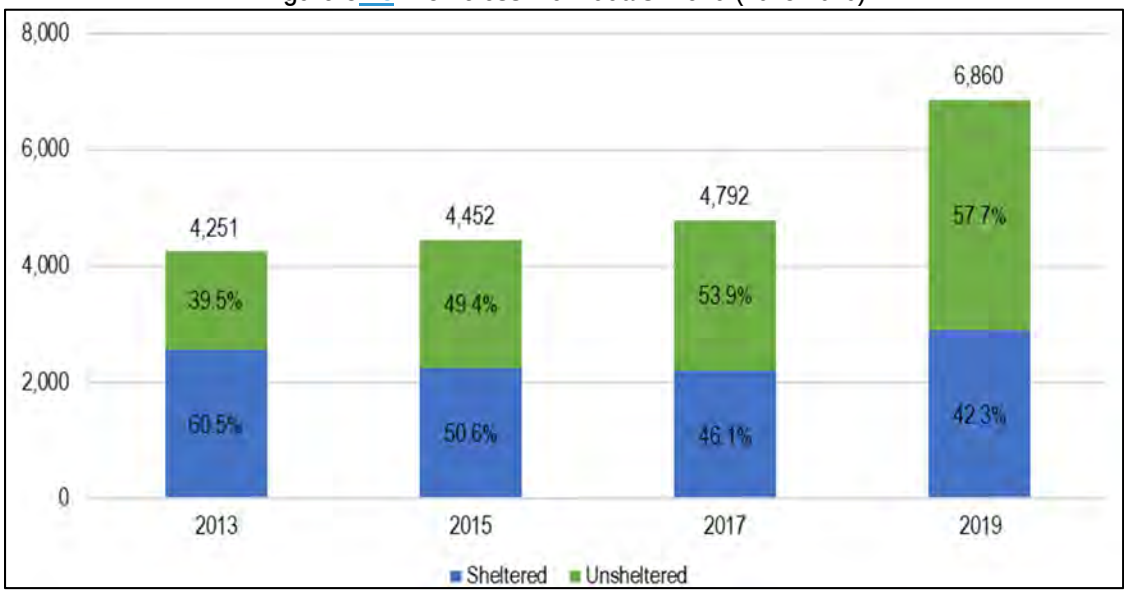
Figure C-44: Urban Displacement Project – Job Displacement Risk

Homelessness

Regional Trend

The Orange County Continuum of Care (CoC CA-602) encompasses the entirety of Orange County including all 34 cities and the unincorporated areas. In compliance with HUD requirements, the Orange County conducts sheltered and unsheltered homeless counts every other year. The County released the Everyone Counts: 2019 Point in Time (PIT) homelessness report July 30, 2019. According to the PIT, there were 6,860 persons experiencing homeless in the County in 2019. Approximately 57.7% of homeless individuals were unsheltered and 42.3% were sheltered. As shown in Figure C-46, the County has seen an increase in homeless individuals since 2013. The proportion of unsheltered homeless individuals has also increased as the population of homeless individuals has grown. Since 2017, the homeless population has grown approximately 43.2%.

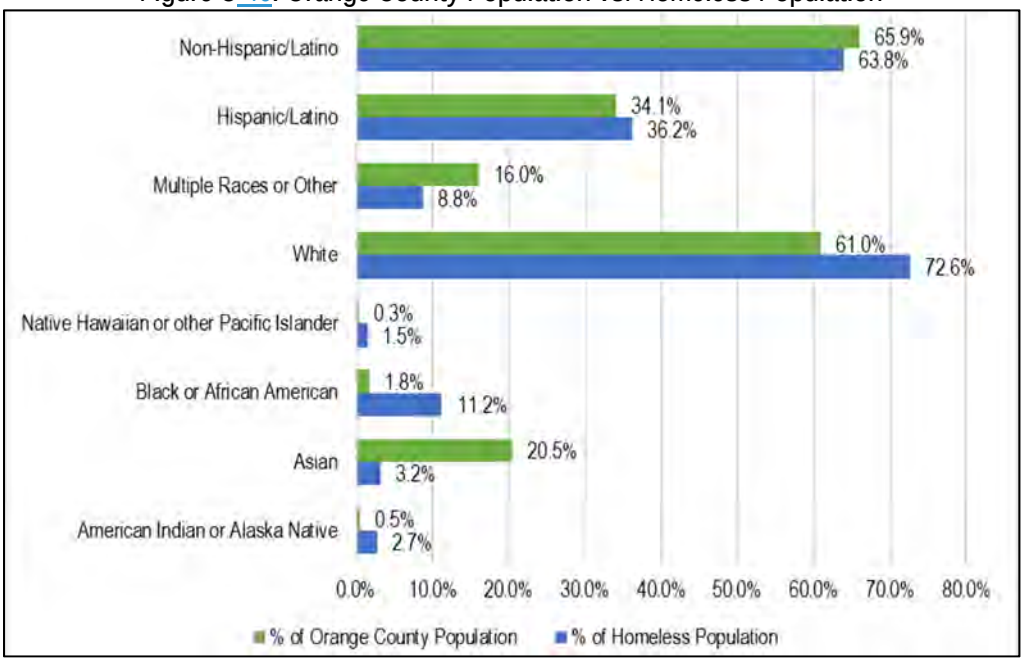
Figure C-45: Homeless Individuals Trend (2013-2019)



Source: Orange County CoC 2017 Homeless Count and Survey Report; Everyone Counts: 2019 Point in Time (PIT) Report.

Figure C-47 compares the distribution of homeless persons and County population by race and ethnicity according to the most recent 2015-2019 ACS. The White and Black populations are the most overrepresented racial groups in the County homeless population. Approximately 72.6% of the homeless population is White compared to only 61% of the population Countywide; 11.2% of the homeless population is Black, compared to only 1.8% of the population Countywide. Hispanic/Latino families are also overrepresented in the homeless population. While only 36.2% of the total homeless population is Hispanic or Latino, comparable to 34.1% Countywide, over 50% of homeless families are Hispanic or Latino.

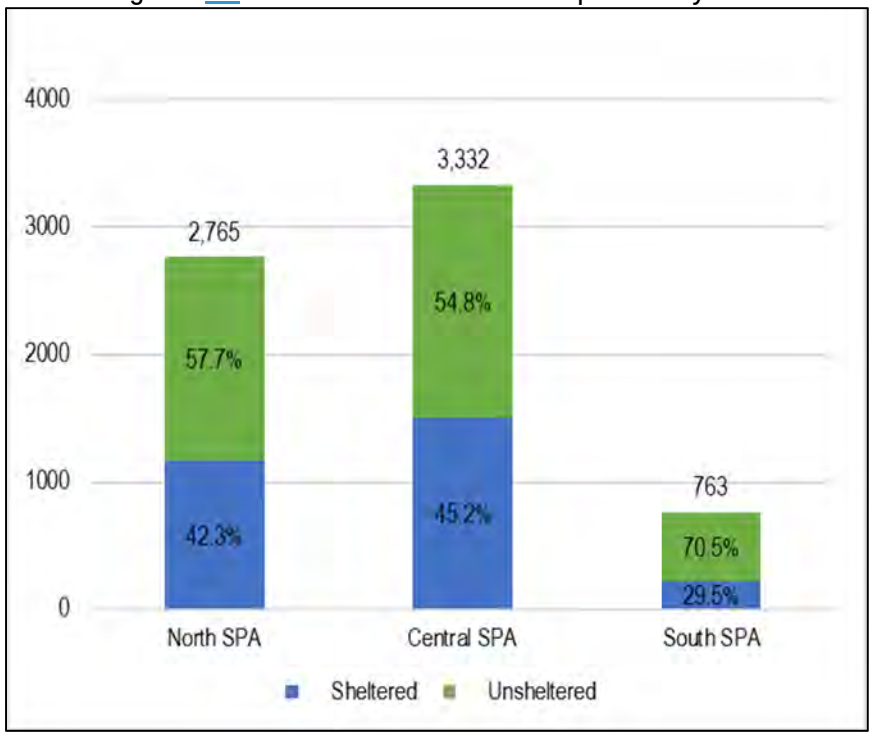
Figure C-46: Orange County Population vs. Homeless Population



Source: Orange County Everyone Counts: 2019 Point in Time (PIT) Report; 2015-2019 ACS (5-Year Estimates).

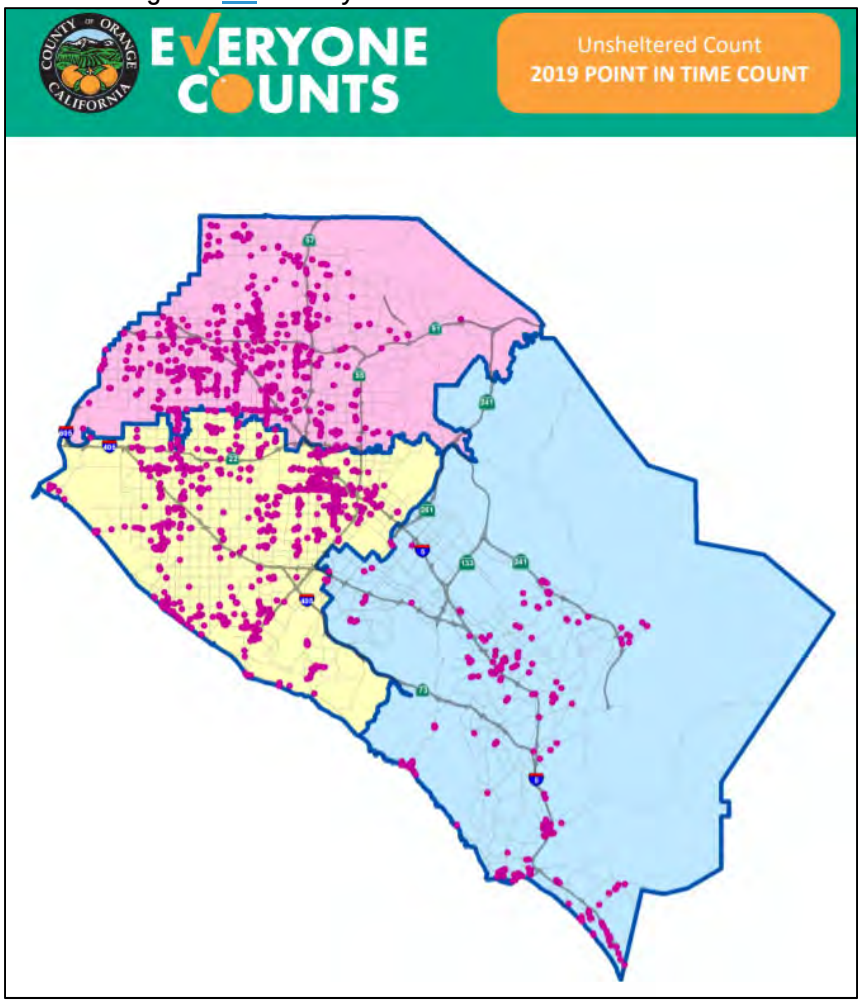
Figure C-48 shows the distribution of homeless populations by Orange County Service Planning Area (SPA). The South SPA, which includes the City of San Clemente, has a far smaller homeless population compared to the North and Central SPAs. The South SPA also has a significantly smaller proportion of sheltered homeless (29.5%), compared to the North SPA (42.3%) and Central SPA (45.2%). The 2019 PIT unsheltered survey was conducted using a smartphone application that GIS mapped the locations of individuals experiencing homelessness. The map included in the 2019 PIT is shown in Figure C-49. The northern and central areas have a high concentration of homeless individuals. In the South SPA, the homeless population was most concentrated along the main highways (I-5, SR 241, and SR 73).

Figure C-47: Distribution of Homeless Population by SPA



Source: Orange County Everyone Counts: 2019 Point in Time (PIT) Report.

Figure C-48: County Unsheltered Point in Time Count



Source: Orange County Everyone Counts: 2019 Point in Time (PIT) Report.

Special needs groups are considered elderly or disabled (including developmental disabilities), female-headed households, large families, farmworkers, and people experiencing homelessness. Table C-28 shows the homeless populations of some of these groups in the County and South SPA, including physically and developmentally disabled, seniors, and families. Homeless persons in families represent 22.6% of the County homeless population and nearly a third of the South SPA. The population of homeless persons with a physical or developmental disability also represent a large proportion of the homeless population in the County and the South SPA.

Table C-28: Homeless Populations – Orange County and South SPA

	Orange County		South SPA	
	Total Persons	Percent	Total Persons	Percent
Physical Disability	1471	25.0%	166	27.4%
Developmental Disability	622	10.6%	66	10.9%
Seniors	612	8.9%	78	10.2%
Families*	1,550	22.6%	244	32.0%
Veterans	311	4.5%	36	4.7%
Transitional Age Youth (18-24)	275	4.0%	44	5.8%
Seniors	612	8.9%	78	10.2%
Total	6,860	100.0%	763	100.0%

* Figure in table represents total persons in homeless families (at least one child and one adult). Orange County has a total of 466 homeless families, and the South SPA has a total of 75 homeless families.
Source: Orange County Everyone Counts: 2019 Point in Time (PIT) Report.

Local Trend

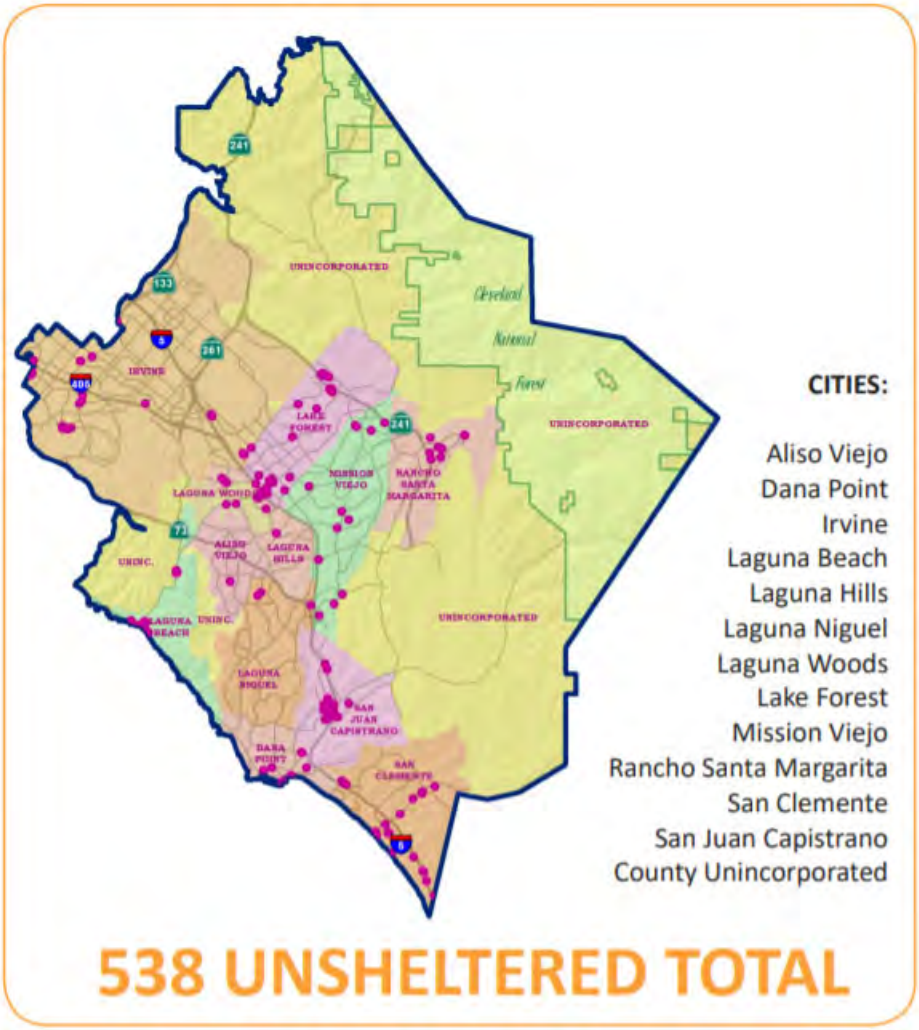
According to the 2019 PIT, 145 people on San Clemente are homeless, 66.2% of which are unsheltered. Over 40% of the homeless population in San Clemente is part of a family, compared to only 22.6% in the County and 32% in the South SPA. A larger proportion of transitional age youth (aged 18-24) also experience homelessness in San Clemente compared to the County (4%) and South SPA (5.8%). Figure C-49 shows the location results of the 2019 PIT unsheltered survey. The unsheltered homeless population was mostly identified along Interstate 5 and Avenida Pico.

Table C-29: Homeless Populations – San Clemente

	Unsheltered	Sheltered	Total
Individuals	90.7%	9.3%	86
Families	30.5%	69.5%	59
Veterans	100.0%	0.0%	6
Transitional Age Youth (18-24)	100.0%	0.0%	9
Seniors	80.0%	20.0%	5
Total	66.2%	33.8%	145

Source: Orange County Everyone Counts: 2019 Point in Time (PIT) Report.

Figure C-49: South SPA Unsheltered Point in Time Count



Source: Orange County Everyone Counts: 2019 Point in Time (PIT) Report.

As part of the City's ongoing effort to reduce homelessness and to address the concern of residents, the City employs a Community Outreach Worker to provide outreach services. The Community Outreach Worker coordinates closely with the Orange County Sheriff's Department, Code Compliance staff, and Park Rangers to provide outreach, case management, appropriate resources, and referrals for homeless individuals and families. From January 2020 to January 2021, the City's Community Outreach Worker engaged with 2,748 individuals for an average of 211 per month. Beyond the 2019 PIT and outreach program data, there are no other data resources on local homeless populations available for San Clemente.

Summary of Fair Housing Issues

Approximately 41% of San Clemente households are cost burdened. Pacific Islander and Hispanic households experience cost burden at the highest rate. There is only one tract in San Clemente where more than 8.2% of households are overcrowded. This tract is a low resource area and has higher concentrations of racial/ethnic minorities and LMI households (see Figure C-4, Figure C-13, and Figure C-19). Tracts along the southwestern City boundary, including the area just mentioned, are considered sensitive communities at risk of displacement.

Over 40% of the City's homeless population are members of families with one or more child. Most families experiencing homelessness are sheltered, but all transitional aged youth and veterans counted in the 2019 PIT were unsheltered.

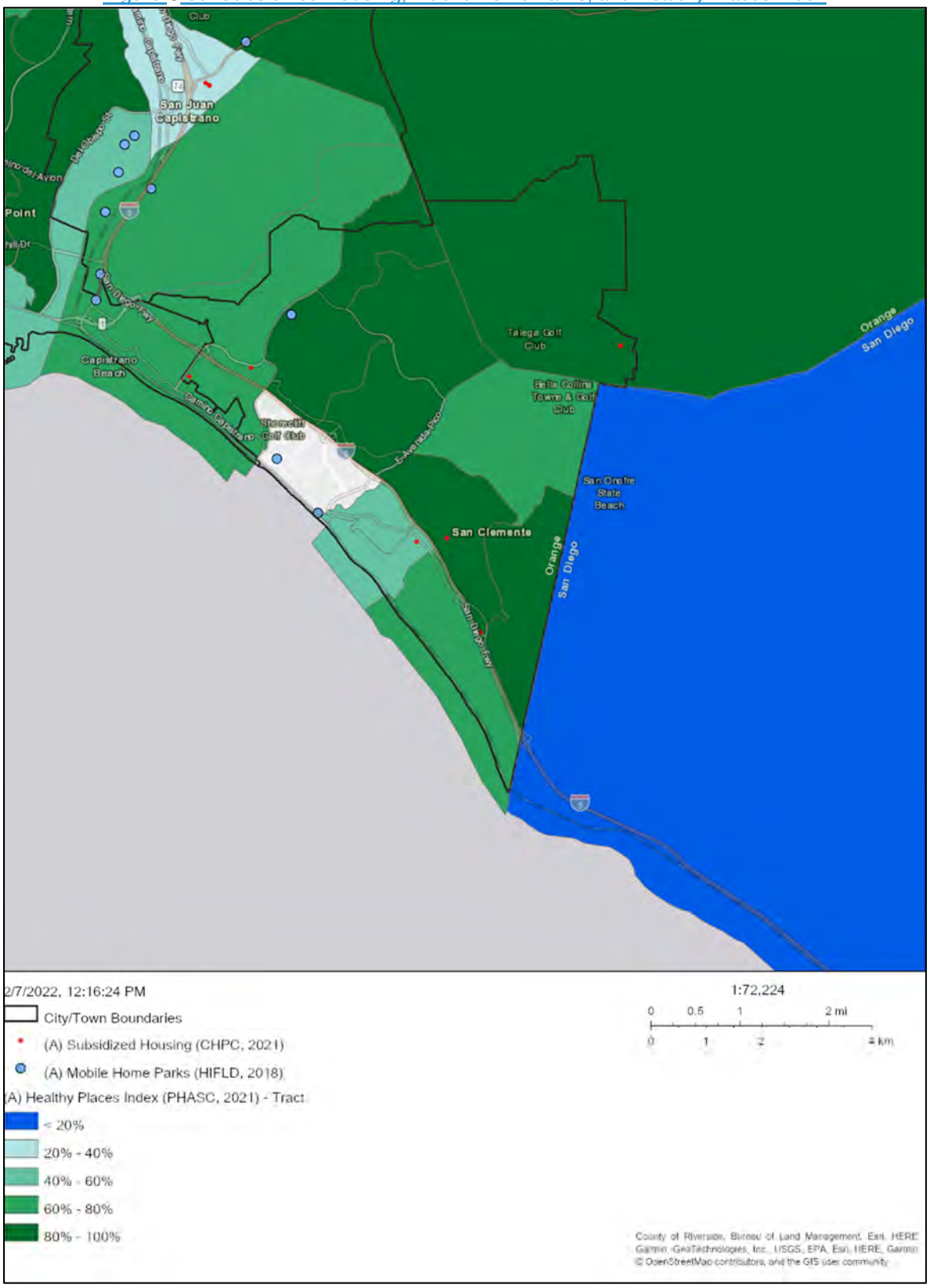
C.2.6 Other Relevant Factors

Concentrations of Fair Housing Issues and Healthy Places Index

There are concentrations of fair housing issues related to segregation, access to opportunities, and disproportionate housing needs in San Clemente, specifically in tracts 421.07 and 421.08 located along the central western City boundary. Up to 5% of renters receive HCVs in these tracts. Additionally, these communities contain block groups with higher concentrations of racial/ethnic minority populations and LMI households. There are fewer children living in married couple households in this area and tract 421.08 has a larger percentage of householders living alone and persons below the poverty level. Tract 421.07 is categorized as a low resource tract, the only low resource area in the City. Further, this area has worse CalEnviroScreen and jobs proximity index scores but are still at levels better than other tracts in Orange County. Tract 421.07 is also the only tract in the City with concentrations of overcrowded households exceeding the Statewide average of 8.2%. Housing units tend to be older in this section of the City and both tracts are considered sensitive communities at risk of displacement. In general, San Clemente has positive healthy places index scores throughout the City.

As shown in Figure C-51 there is one subsidized housing project and one mobile home park in these communities, which may contribute to the concentration of sensitive populations, as these housing types typically house lower income households. Figure C-51 also shows the Healthy Places Index (HPI) by tract. HPI uses community conditions, including housing, transportation, and environmental conditions, to predict life expectancy. It is relevant to note that three of the six subsidized housing projects are in the highest scoring HPI tracts (>80 percent) and two are in the second highest scoring tracts (60 to 80 percent). Tracts 421.07 and 421.08 have the lowest HPI scores in the City. According to the HPI, these tracts have most park access and retail density, but lower supermarket access (Figure C-51, Figure C-52, Figure C-53). These neighborhoods also have high employment rates but lower median incomes and fewer persons with college degrees (Figure C-54, Figure C-55, Figure C-56). Homeownership is also lower in these tracts and a significantly lower proportion of adults have health insurance (Figure C-57, Figure C-58). Tract 421.08 also has a larger population of non-English speakers compared to the remainder of the City (Figure C-59). Downtown San Clemente is located in tract 421.08, and likely has more lower paying retail and service jobs due to the concentration of retail and service employers in the area. According to the HPI, there is also a higher concentration of adults who work outdoors in these communities (Figure C-60).

Figure C-50: Subsidized Housing, Mobile Home Parks, and Healthy Places Index



Source: HCD AFFH Data Viewer (California Housing Partnership (CHPC) 2021, Homeland Infrastructure Foundation-Level Data (HIFLD) 2018), Healthy Places Index – Public Health Alliance of Southern California (PHASC)), 2022.

Figure C-51: Healthy Places Index – Park Access

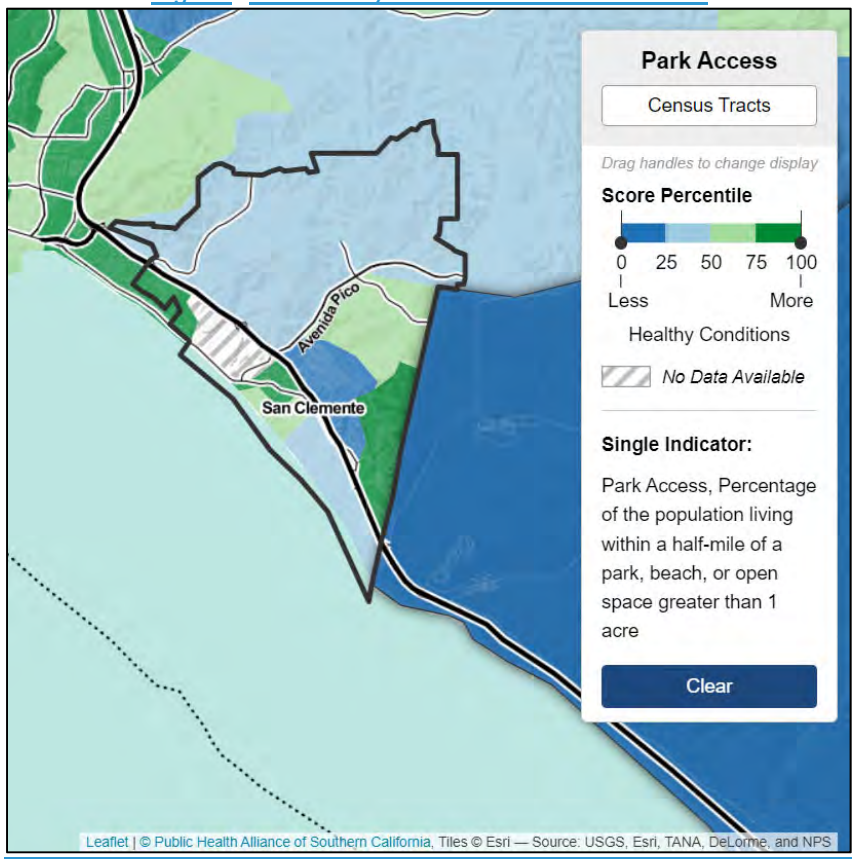


Figure C-52: Healthy Places Index – Retail Density

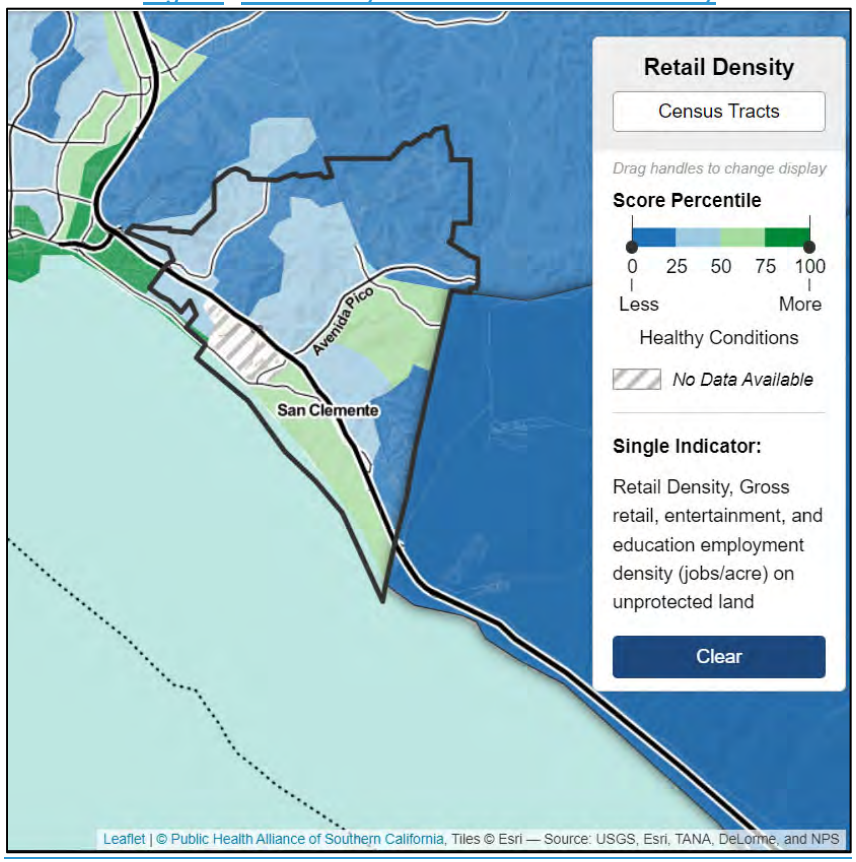


Figure C-53: Healthy Places Index – Supermarket Access

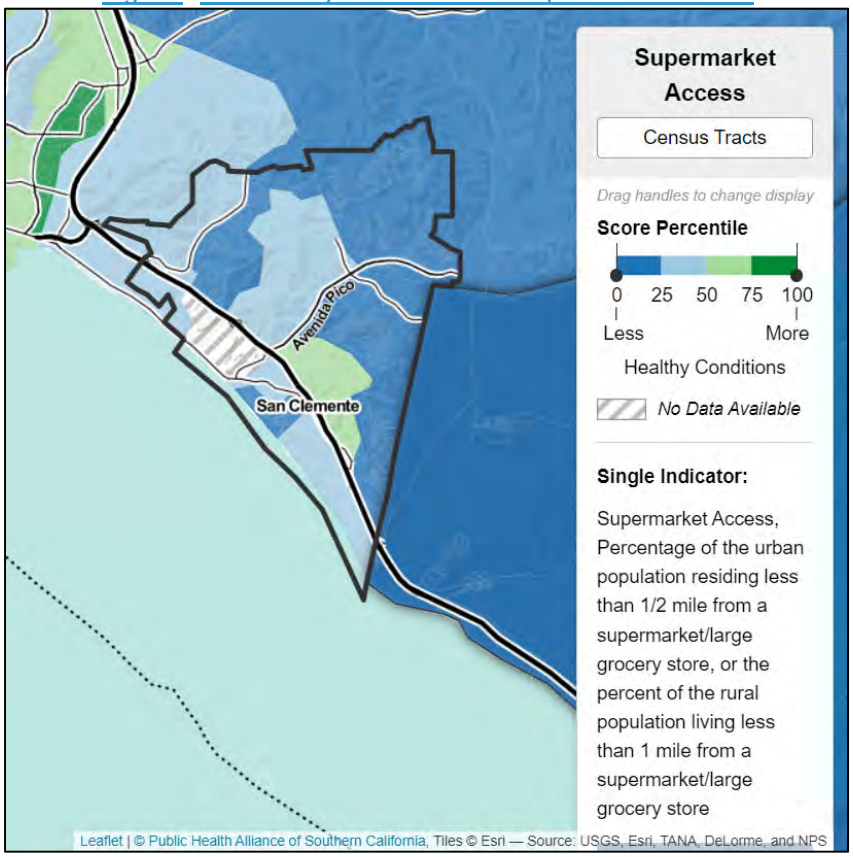


Figure C-54: Healthy Places Index – Employed

Figure C-55: Healthy Places Index – Median Household Income

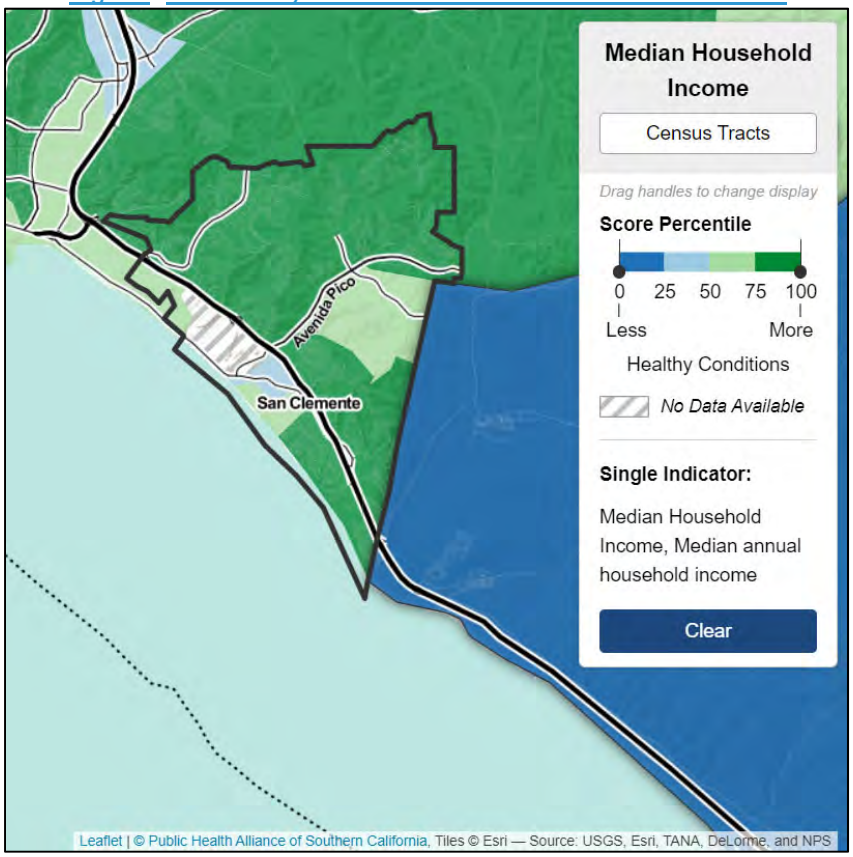


Figure C-56: Healthy Places Index – Bachelor's Education or Higher

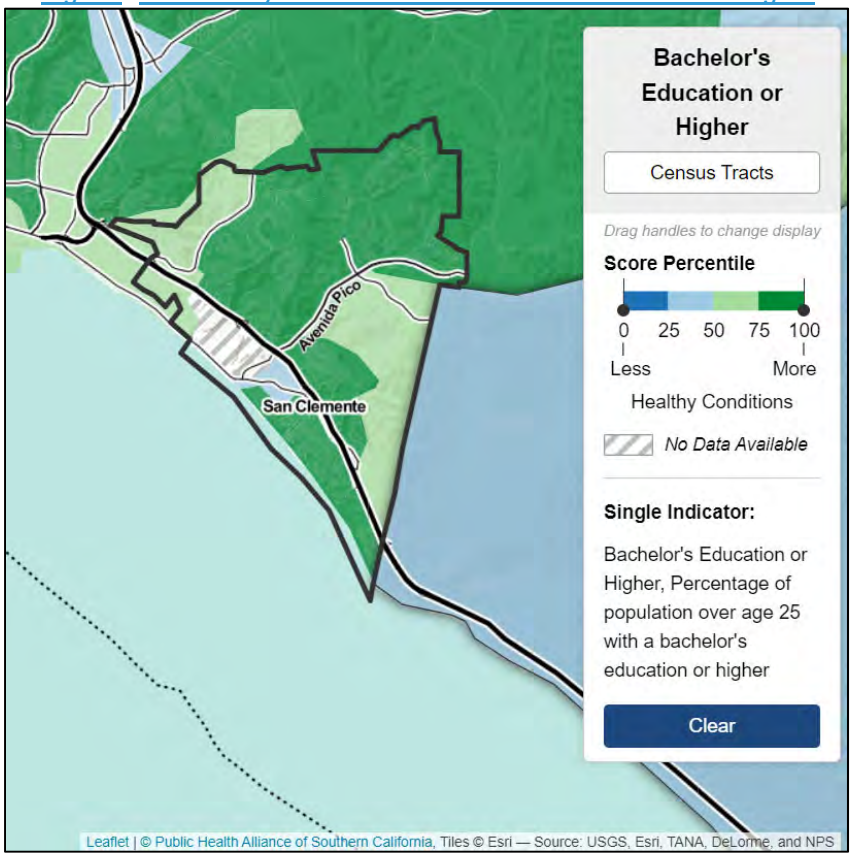


Figure C-57: Healthy Places Index – Homeownership

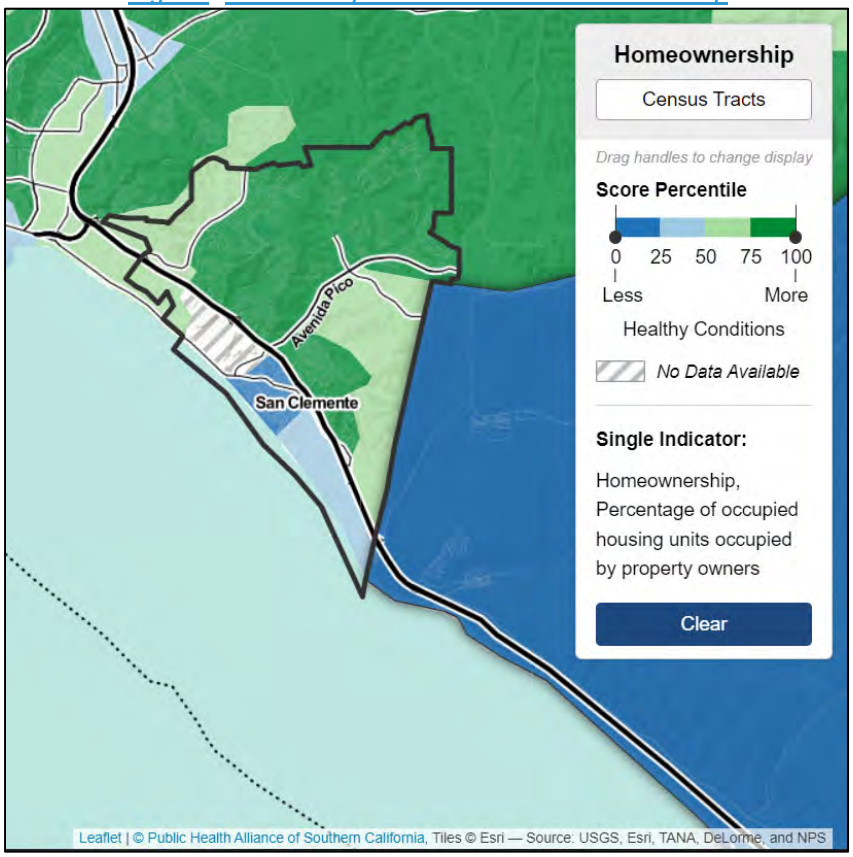


Figure C-58: Healthy Places Index – Insured Adults

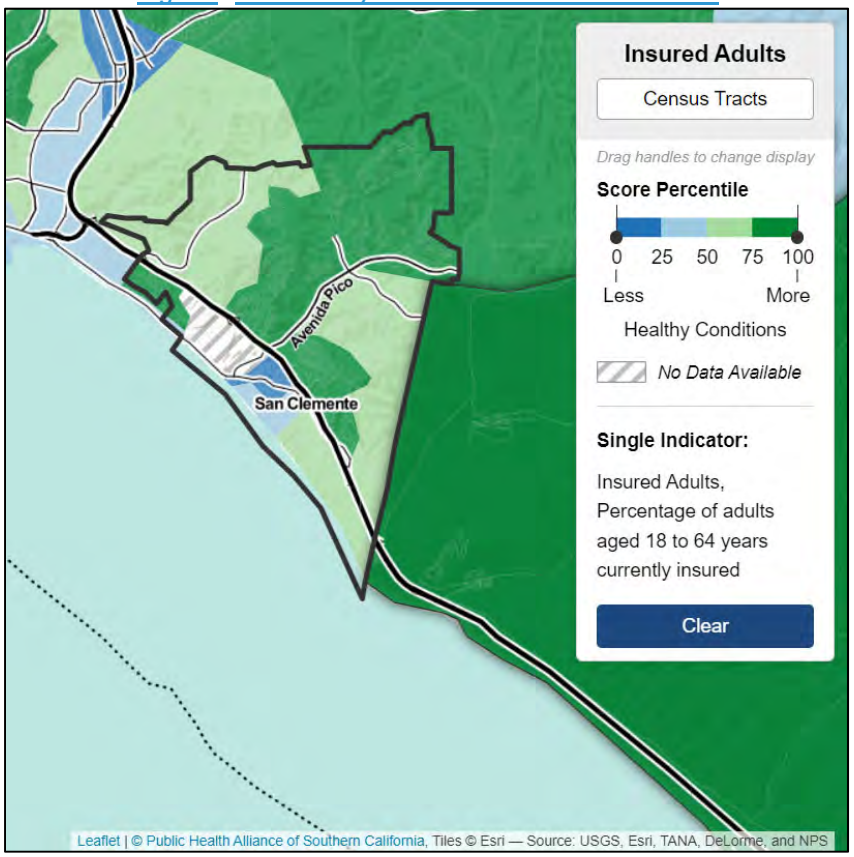


Figure C-59: Healthy Places Index – English Speaking

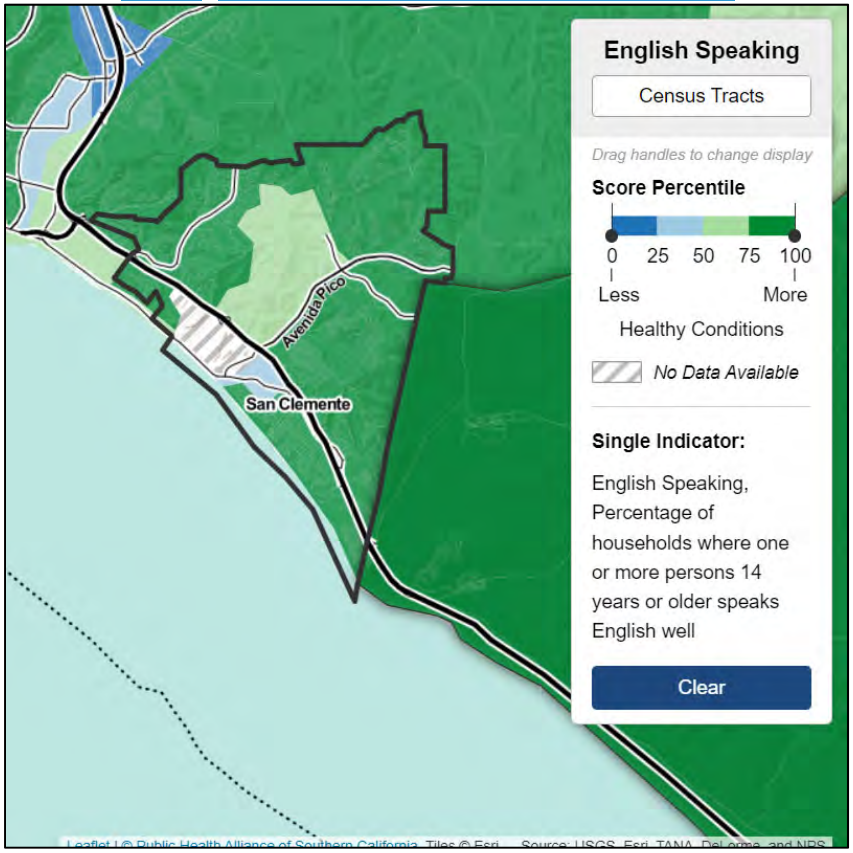
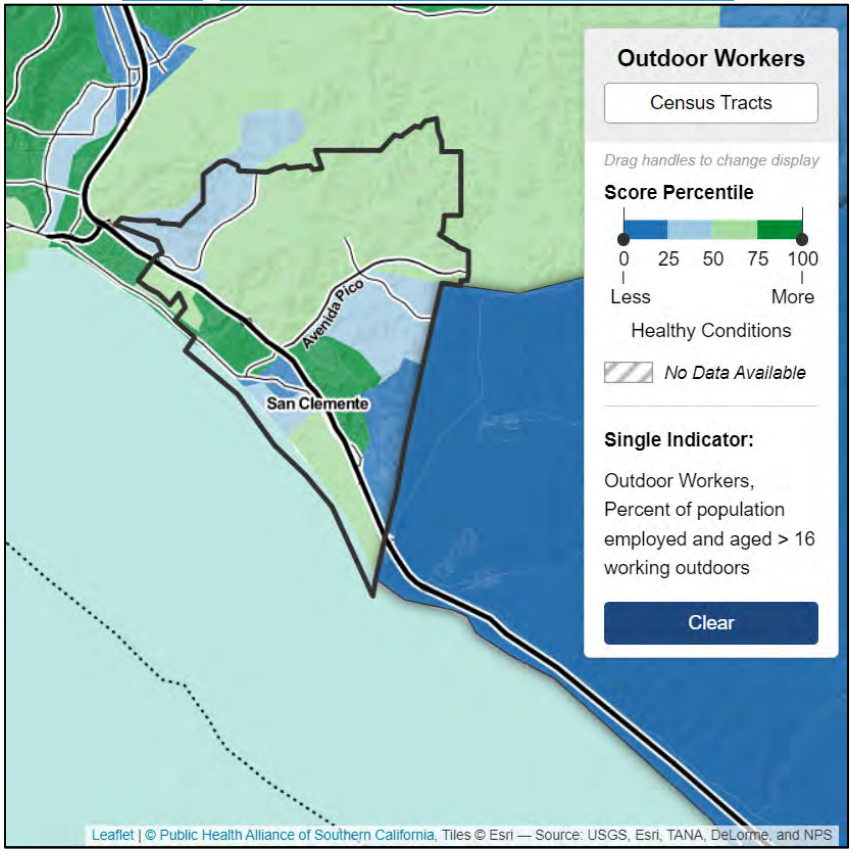


Figure C-60: Healthy Places Index – Outdoor Workers



Lending Patterns

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. In the past, credit market distortions and other activities such as "redlining" were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants. Table C-30 examines detailed 2020 HMDA data for the City of San Clemente.

American Indian/Alaska Native and Asian applicants had the highest loan denial rates in the City of 28.6% and 25%, respectively. Although Hispanic or Latino applicants were denied at a higher rate (16.9%) compared to non-Hispanic applicants (15.7%), the difference of 1.2% indicates preferential treatment is not present. Conversely, only 14.3% of joint race applicants, 15.2% of White applicants, and no Hawaiian/Pacific Islander applicants were denied.

Typically, higher income applicants tend to have lower loan denial rates. However, in San Clemente, only 11.9% of moderate income applicants and 13.8% of middle income applicants were denied compared to 16.4% of upper income applicants, indicating preferential treatment of upper income applicants is not presents. However, there were no low income loan applicants in 2020, which may signify the exclusion of lower income households in the housing ownership market.

Table C-30: Loan Data by Type, Race/Ethnicity, and Income

	Originated/ Approved	Denied	Total
Purpose/Type			
Purchase - Conventional	66.0%	11.2%	1,635
Purchase - Government	75.7%	6.1%	115
Home Improvement	61.9%	20.6%	320
Refinancing	59.0%	18.9%	2,339
Applicant Race/Ethnicity			
American Indian/Alaska Native	42.9%	28.6%	14
Asian	53.0%	25.0%	168
Black or African American	55.6%	16.7%	18
Hawaiian/Pacific Islander	88.9%	0.0%	9
White	63.2%	15.2%	3,445
Joint Race (White/Minority)	59.2%	14.3%	98
Race Not Available	60.3%	16.6%	657
Hispanic or Latino	60.2%	16.9%	166
Not Hispanic or Latino	62.5%	15.7%	3,522
Income			
Low (0-49% of Median)	0.0%	0.0%	0
Moderate (50-79% of Median)	59.6%	11.9%	109
Middle (80-119% of Median)	66.8%	13.8%	799
Upper (>=120% of Median)	61.2%	16.4%	3,501

Note: This dataset excludes withdrawn or incomplete loan applications.
Source: HMDA Loan Data – San Clemente city, 2020.

C.3 Sites Inventory

Sites used to achieve the City's RHNA were analyzed by income level and the following fair housing variables: racial/ethnic minority population, population of persons with disabilities, percent of children living in married couple households, LMI household population, TCAC opportunity area, CalEnviroScreen 4.0, population of cost burdened owners, population of cost burdened renters, and percent of overcrowded households. It is especially important to assess the location of lower income RHNA units to ensure low income households are not concentrated in areas with larger sensitive or special needs populations. In general, the San Clemente's RHNA strategy does not concentrate units of any income level in a single area of the City. However, a larger percentage of lower income units are in block groups or tracts with more racial/ethnic minorities, LMI households, cost burdened owner-households, and overcrowded households compared to moderate and above moderate income units. There are also more lower income units in the low resource tract and in tracts with fewer children living in married couple households.

This pattern is, in part, due to the larger parcels found to be adequate for lower income units located in tract 421.07, the only low resource tract in the City. As discussed previously, this area is in the proximity of Downtown San Clemente, attracting more retail and service industries and therefore, more lower paying jobs. While there are concentrations of sensitive communities in this part of the City, this area has superior access to some facilities and resources including transit stations, retail, and parks (see Figure C-43, Figure C-51, and Figure C-52). The City's RHNA strategy does not concentrate all lower income units

in this community and includes sites adequate for lower income housing in the northern and eastern areas of the City where fair housing issues are less prevalent.

Rezone sites Q – S comprise the largest site identified in tract 421.07 and can accommodate 251 lower income units and nine moderate income units. Non-rezone sites 15 – 17 and sites 45 – 47 are also located in this tract and can accommodate 14 moderate income units and 98 lower income units. These sites are within the Neighborhood Mobility Area, a Priority Growth Area, identified in the region's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). As analyzed in SCAG's HQTA Pilot Project, this site would connect housing to services and transportation, including trails, bike routes, and a train station, ensuring ample access to transportation opportunities. The remaining sites in this tract do not include units counted towards the City's lower income RHNA.

Further, through actions included in this Housing Element, the City will focus efforts related to fair housing in this community to promote housing mobility, protect against displacement, and mitigate disproportionate housing needs.

C.4 Identification and Prioritization of Contributing Factors

C.4.1 Concentration of Racial/Ethnic Minorities in Low Resource Areas

According to dissimilarity indices for San Clemente, segregation is considered low between all racial/ethnic minority communities and White communities. However, dissimilarity index scores measuring segregation between Black and White groups and Asian/Pacific Islander and White groups have increased substantially since 1990. Most block groups in San Clemente have racial/ethnic minority populations below 40%. There is a concentration of block groups on the western side of the City along Interstate 5 where up to 60% of the population belongs to a racial/ethnic minority group. This area also has higher concentrations of LMI households, overcrowded households, and aging housing units. This area is considered a low resource area and a sensitive community at risk of displacement.

Priority level – Moderate

Contributing Factors

- Patterns of racial and ethnic concentration are present in the low resource area on the western side of the City
- Lack of investments in specific neighborhoods
- Location and type of affordable housing

C.4.2 Housing Mobility and Communities At Risk of Displacement

Over 40% of San Clemente households are cost burdened including 57.6% of Pacific Islander households and 49.1% of Hispanic/Latino households. Between 40% and 80% of renters overpay for housing in most areas of the City. While some areas have seen a decrease in overpaying renters over the past five years, there has been an increase in cost burdened renter households in several tracts in the central and eastern areas of the City (see Figure C-34). Tracts along the southwestern City boundary are considered sensitive communities at risk of displacement. Between 44% and 59% of renters overpay for housing in these communities. Further, job displacement risk disproportionately affects the areas surrounding Downtown San Clemente along the central western City boundary, heightening displacement risk. This section of the City has high employment rates but low median incomes, indicating a concentration of low-paying employment opportunities. Despite the concentration of low income residents and overpaying

households, less than 5% of renters received HCVs. Homeownership in these communities is the lowest in the City and there were no home loan applications submitted by low income residents in 2020. It is relevant to not that this area of the City has a higher concentration of multi-family housing units and therefore renters.

Priority level – High

Contributing Factors

- Unaffordable rents and sales prices in a range of sizes
- Displacement of residents due to economic pressures

C.4.3 Disproportionate Housing Needs

Approximately 43% of households in San Clemente have one or more housing problem. Citywide, 33.6% of owner households and 53.9% of renter households overpay for housing, exceeding the proportion in the County. Between 20% and 60% of owners overpay for housing Citywide and up to 80% of renters overpay for housing in tracts in the central and eastern areas of the City. Single-family housing units make up nearly 69% of the City's housing stock. Approximately 68.9% of housing units in San Clemente were built 30 years ago or earlier and may require repairs or rehabilitation. Of the total housing units in the City, 0.8% are supported through the project-based Section 8 Program and 0.5% are supported through the HCV Program. Less than 5% of renter-households receive HCVs in tracts along the western City boundary, where up to 60% of renters are cost burdened.

Aging housing units are most concentrated in tracts 421.06 (72.1% older than 50 years) and 421.07 (67.9% older than 50 years). These tracts also have the lowest homeownership in the City, indicating that many aging housing units are renter-occupied. There were no home purchase, home improvement, or refinancing loan applications submitted by low income residents in 2020 demonstrating homeownership may not be feasible for low income households.

Priority level: Moderate

Contributing Factors

- Unaffordable rents and sales prices in a range of sizes
- Shortage of subsidized housing units
- Cost of repairs or rehabilitation
- Dominance of single-family housing, which is typically more expensive than multi-family

C.4.4 Outreach and Education

FHF does not currently test for housing discrimination in San Clemente and discrimination audits are not included in the scope of work. The City should continue to utilize the social media platforms to advertise fair housing information. FHF should also continue to offer Virtual Housing Workshops in English and Spanish, as they have been since the COVID-19 outbreak, to increase accessibility for residents. Outreach and education about fair housing laws and programs should be focused in overpaying communities where few receive publicly supported housing (western and eastern City boundaries).

Additional fair housing testing and outreach should be conducted in tracts 421.07 and 421.08, where non-White and LMI households are concentrated. In addition to larger populations of racial/ethnic minorities and low income households, this area also has higher concentrations of renter-occupied households, and

jobs at risk of displacement. According to HMDA data, 15.8% of all home loans (purchase, home improvement, and refinancing) in San Clemente were denied in 2020. American Indian/Alaska Native (28.6%) and Asian (25%) applicants were all denied at rates higher than the City average of 15.8% (includes conventional purchase, governmental purchase, home improvement, and refinancing loans).

Priority level: High

Contributing Factors

- Lack of fair housing testing
- People obtain information through many media forms, not limited to: traditional newspaper noticing or other print forms. Increasingly fewer people rely on the newspapers to receive information. Public notices and printed flyers are costly and ineffective means to reach the community at large.

Appendix D: Inclusionary Housing

D.1 Purpose and History of the Inclusionary Program

The purpose of the Inclusionary Housing Program is to expand the affordable housing stock in San Clemente in proportion with the overall increase in new residential units built in the City, thus providing housing for a varied and viable population. The program was originally established in 1980 and has been amended since then to adjust for changing market conditions and circumstances. However based on a 2009 California State Supreme Court action denying review of a lower court decision in the Palmer v. City of Los Angeles case, typical inclusionary housing requirements throughout the State have been altered to conform with the Court's action. This means that, with very limited exceptions (e.g., density bonus projects and projects receiving governmental financial assistance), inclusionary requirements for rental projects are illegal/unenforceable in California.

During the 1980s, three apartment complexes were built in the Ranch developments providing a total of 810 new apartment units to meet inclusionary requirements. By 1998, all Inclusionary projects built in Rancho San Clemente and Marblehead had fulfilled their term of affordability as required by the Inclusionary Program established in 1980.

No new apartments were built within Ranch developments for households earning 50% or less than median income through the Inclusionary Housing Program between 1989 and 1999. In 2000, the Talega developers provided 10 acres of land for the provision of a 186-unit affordable family apartment complex to meet their inclusionary requirements. The option to develop the project was provided to Jamboree Housing Corporation, a non-profit housing organization. It was completed in 2003.

Through the evaluation of past inclusionary projects, it was determined that very low income households are better served by affordable rental units than for-sale housing. Therefore, the option for developers to provide for-sale housing to meet their Inclusionary requirements was eliminated in 1996.

During the 2000-2007 Housing Element planning period, the Inclusionary Housing Program required all new developments with 6 or more units to provide a total of 4% of the units to households earning 50% or less than median income. This could be accomplished through the construction of new apartment units, either on- or off-site, through the payment of an in-lieu fee or provision of land, or a combination to be recommended by the Community Development Director. The City Council has recommended that the Inclusionary Program continue as adopted in 2000.

With the City of San Clemente nearing build out a different strategy is needed to provide a share of all new housing units as affordable to very low income households. All of the Ranch properties have been approved and the one large remaining project, Marblehead Coastal, will be paying an in-lieu fee. There is over $4 million in in-lieu fees and RDA Housing Funds which are available for development of housing for the lower wage workforce or seniors. In 2006, the City Council adopted the Affordable Housing Overlay Zone along El Camino Real. The Overlay is zoned commercial and the only housing which can be built is senior housing or mixed income housing with 51% of the units affordable to households earning up to 50% of area median income. Most of the properties will generate projects of less than 25 units, except for the old Coco's restaurant site, if properties are consolidated, or old motels are redeveloped. The

Overlay sites are unlikely to be developed without an incentive program including, financial assistance to non-profit organizations to purchase the affordable units or build new housing projects. The requirement to provide on-site affordable units results in less resistance to affordable housing when they are proposed as part of a mixed income development.

D.2 2008 Inclusionary Housing Program Recommendations

Who Participates: The program shall apply to new developments of 6 or more dwelling units intended to be built as a single project. Affordable units will be eligible for development incentives, density bonuses and financial assistance.

Term of Affordability: Inclusionary units shall remain affordable for a minimum of 30 years, or if other public financing has longer terms the longest term shall prevail. Household income and rent for rent-restricted units must be reported annually to the Community Development Department - Housing Program.

Type of Units: Affordable units shall be for rent only and shall have the same proportionate number of bedrooms as the non-inclusionary project. All new inclusionary units shall be owned and operated by a non-profit housing organization, unless the owner agrees to a deed restriction and enters into regulatory agreement with the City, which shall include the management of the affordable units by a non-profit organization.

The requirement for new units may vary depending on the number of bedrooms per apartment and market needs. For example, if the developer is building 100 three-bedroom homes, and 13 affordable units are required, a minimum of 13 three-bedroom apartments with housing cost at 50% of median income can be built to meet the inclusionary requirement. An alternative, depending on market needs, and with a recommendation by the Community Development Director, and approval by the City Council, the developer can choose to meet the inclusionary requirement by providing 39 bedrooms in a combination of apartment types including: studios, one-, two-, three- or four-bedroom units, resulting in a variation of the number of housing units.

Housing Cost: Affordable units shall be rented out to households earning 50% or less than median income, with rents no greater than 30% of 50% of Orange County Median Income by household size less the utility allowance. For example: The 2007 Orange County Median Income for a four-person household earning 50% of median income is $43,300. Allowable housing costs are derived by dividing $43,300 by 12 months, multiplied by 30%, generating total monthly housing costs of $1,083. A utility allowance is deducted from the housing costs to determine the actual rent amount. Utility allowances are adjusted annually and are established by the Orange County Housing Authority. For example, if a one-bedroom apartment's utility allowance is $40, then the allowable rent would be $1,043. Housing costs are adjusted annually by household size and household income.

Developer Options:

Options will be subject to a recommendation by the Community Development Director and approval of an Affordable Housing Agreement by the City Council.

1. Build new apartments (4% of total number of units) on or off-site, with rental costs affordable to households earning 50% of median income by household size. The number of very-low-income units required is a minimum of 4% of the total number of new units built. The requirement may be varied depending on the number of bedrooms per apartment and market needs. For example, if the developer is building 100 - 3 bedroom homes, and 4 affordable units are required, a minimum of 4 3-bedroom apartments with housing cost at 50% of median income can be built to

meet the inclusionary requirement or depending on market needs, and with a recommendation by the Community Development Director, the developer can choose to meet the inclusionary requirement by providing 12 bedrooms in a combination of apartment types including: studios, one-, two-, three- or four-bedroom units, resulting in a variation of the number of housing units.

2. Pay an in-lieu fee. The in-lieu fee will be paid at the same time of payment of building permit fees.
3. Provide the equivalent amount of land (on-site or off-site) and development fees to a non-profit developer to own and build the required number of inclusionary housing units generated from the proposed development (more units may be built, but not less).

Definitions:

1. *Eligible Households* - One or more persons in a household whose combined income(s) is within 0-50% of Orange County median income for that household size.
2. *Housing Cost for Affordable Units* - Housing cost shall not be greater than the payment of rent and utilities equal to 30% of 50% of median income.
3. *Household Income* - As determined by the U.S. Dept. of Housing and Urban Development (HUD) for each State and County annually.

D.3 In-Lieu Fees

The in-lieu fee is based on 1% of construction value. An annual housing market analysis is required to ensure the fee is commensurate with the current affordability gap. The construction value will be calculated by the Building Department and 1% of the value will be compared to the housing gap analysis prepared by the Housing Program. The in-lieu fee will be equivalent to the gap times 4% (the inclusionary percentage), for final determination of the in-lieu fee per market rate unit (see formula below).

The in-lieu fee is based upon provision of housing for households earning no more than 50% of median income. The fees will allow for a variety of housing options. Through the use of in-lieu fees and other government grants, funds to non-profit organizations could be used to acquire existing apartments, construct new apartments, or the purchase and conversion of old motels. The funds would allow for alternative forms of housing for the special needs population and low wage workforce. The use of in-lieu fees would also allow a non-profit developer to purchase the inclusionary unit(s) built as part of a market rate project.

In order to understand the cost of affordable housing it is necessary to understand the cost of development and how the affordability gap is determined. The cost of development includes direct construction costs, indirect costs (design, financing and government fees), land costs and developer's profit. The development value of an affordable unit (based on allowable rent or sales price less operating costs), is then calculated and subtracted from the development costs. The difference generates the "affordability gap." The affordability gap is the amount of subsidy needed to create affordable units. The components of the in-lieu fee for a rental housing development include the following:

1. Lowest prevailing mortgage rate available for multi-family units available at the time of analysis.
2. Construction costs per the McGraw/Hill construction index, plus government fees and other soft costs as a percent of direct construction costs.

3. Apartment overhead and maintenance costs per non-profit housing standards and utility costs.
4. Current year HUD median income for Orange County family of 4 (or family of 2 for senior housing development).
5. Affordable rents based on the payment of 30% of a household's income paid toward housing costs at the 50% of median income level.
6. Cost of land (average cost per square foot as determined by land sold within the previous year of a sampling of multi-family residential and affordable overlay parcels).

The following example illustrates how the fee is generated based on the housing cost variables. In 2019, the City initiated a review of the in-lieu fee. In 2021, the City Council determined the fee formula continues to be appropriate.

D.4 Cost of Affordable Housing/In-Lieu Fee

Development Costs direct construction costs (unit size, 1100 sq. ft x construction cost/sq.ft) + indirect costs as a percentage of direct costs (35%) + land cost (average land value/sq.ft/unit)

Subtract the Affordable unit's ability to pay - Very Low Income household - 4 person household income/12 x .30 = Monthly Rent minus monthly overhead & maintenance cost minus utility allowance = Very Low Income unit value

Equals Cost /Affordable Unit = (Affordability Gap)

Affordability Gap x 4% inclusionary variable = In-lieu fee/market rate unit

D.5 Use of Fees

The fees are used to subsidize development of new affordable units and would be leveraged in combination with other State or Federal subsidies as applied for by a non-profit organization. Off-site development of affordable units would be at the discretion of the developer to partner with a non-profit organization to build or purchase the units to meet their inclusionary requirements. Subsidies and development incentives would be dependent on availability and based on the development proposed.

D.6 Future Actions

While the City's inclusionary housing program has been implemented at four percent of the total units, the Zoning Code has been set at 15 percent. The City will amend the Zoning Code to be consistent with how the City has been implementing the program.

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January 12, 2022

Erik Sund, City Manager
City of San Clemente
910 Calle Negocio
San Clemente, CA 92673

Dear Erik Sund:

RE: City of San Clemente's 6th Cycle (2021-2029) Adopted Housing Element

Thank you for submitting the City of San Clemente's housing element adopted on October 5, 2021 and received for review on October 14, 2021. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from the Emergency Shelter Coalition, San Clemente Affordable Housing Coalition, Welcoming Neighbors Home Initiative, Public Law Center, Josh Albrektson, Bahram Esfahani, Kathy Esfahani, Deana Gullo, William (Bill) Kreutinger, Joan Thompson, Jacky Trani, Fran Turner, and Paula Wojtaszek pursuant to Government Code section 65585, subdivision (c).

The adopted element addresses many statutory requirements described in HCD's August 6, 2021 review; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of this statutory deadline, then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

HCD appreciates the hard work, professionalism, and dedication of Cecilia Gallardo-Daly and Jennifer Savage during the review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Marisa Prasse, of our staff, at Marisa.Prasse@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure

CHANGES MADE TO ADDRESS COMMENTS

APPENDIX
CITY OF SAN CLEMENTE

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml. Among other resources, the housing element section contains HCD's latest technical assistance tool, Building Blocks for Effective Housing Elements (Building Blocks), available at http://www.hcd.ca.gov/community-development/building-blocks/index.shtml and includes the Government Code addressing State Housing Element Law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Integration and Segregation: The adopted element includes additional data for segregation by race/ethnicity, disability status, familial status, and income at the regional level; however, the analysis must still incorporate local data and knowledge and other relevant factors. In addition, the element must analyze any unique attributes about the City related to fair housing issues such as coincidence across various components (e.g., segregation and integration and disproportionate housing needs) of the assessment of fair housing. This analysis should particularly address patterns and trends related to incomes. Local data and knowledge should complement federal, state, and regional data where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Other relevant factors should analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, demographic trends, historical patterns of segregation, or other information that may have impeded housing choices and mobility.

   See pages C-6 to C-8 for additional local race/ethnicity analysis. See page C-11 for already provided disability local analysis. See page C-14 for already provided familial local analysis, and page C-15 for additional familial local analysis. See pages C-21 to C-22 for expanded income local analysis.

   Furthermore, the summary of integration and segregation does not appear to reflect the data. For example, the data appears to show significant differences within the City and between the City and the region related to race/ethnicity, familial status, and income.

   See page C-25 for revised summary that identifies San Clemente's higher local White population when compared to the regional White population. See also the pages identified in the response above for local and regional discussion of familial status and income.

   Concentrated Areas of Affluence: While the adopted element was revised to include an analysis of Racially Concentrated Areas of Affluence (RCAA) at the local level, it should incorporate local data and knowledge, other relevant factors, and evaluate coincidence across the components of the assessment of fair housing as described above.

   See pages C-29 to C-30 for additional analysis of other relevant factors.

	CHANGES MADE TO ADDRESS COMMENTS
Disparities in Access to Opportunity: The adopted element was revised to include data on spatial trends regarding access to opportunity metrics; however, the element should incorporate local data and knowledge, other relevant factors, and evaluate coincidence across the components of the assessment of fair housing as described above.	**See pages C-34, C-35, C-38, C-50 for expanded local and other factor analysis. Noted on page C-53, San Clemente consists of mostly Moderate resource areas, with one Low resource area; there are no High resource areas in San Clemente.**
Disproportionate Housing Needs, Including Displacement: The adopted element includes additional information regarding spatial patterns in the city for overcrowding, substandard housing, cost burden and homelessness. However, the element should incorporate local data and knowledge, other relevant factors, and evaluate coincidence across the components of the assessment of fair housing as described above. In addition, the City should consider additional displacement data from the Urban Displacement Project. Please see https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/.	**See new Other Relevant Factors discussion beginning on page C-78. See new Urban Displacement Project discussion beginning on page C-68.**
Site Inventory: The adopted element includes additional data regarding sites and concentrations of socio-economic characteristics. However, the element should analyze the location and impact on the existing patterns to evaluate if the site inventory improves or exacerbates conditions, particularly related to patterns of income and concentrated areas of affluence. This analysis of identified sites should address any lack of housing opportunities for lower-income households in the portions of the city that are proportionally whiter and more affluent. Furthermore, the analyses in the element indicate that the site inventory exacerbates segregation by race/ethnicity, segregation by familial status, segregation by income, and access to opportunity in the City. The element should be accompanied by adequate programs to ameliorate these impacts. The element should expand the programs and list of sites to better formulate development opportunities, goals, actions, and metrics that will result in broader equitable quality of life throughout the community.	**See additional sites inventory discussion beginning on page C-68. See additional text throughout that concludes the site would improve previous patterns. (e.g C-57, C-60).**
Contributing Factors to Fair Housing Issues: Some of the contributing factors listed in the adopted element appear detached from the Assessment of Fair Housing analyses, while other salient fair housing issues identified in the Assessment of Fair Housing are missing from the list of contributing factors (e.g., regional patterns of segregation by race/ethnicity and income, access to opportunity). Based on a complete analysis, the contributing factors should be reassessed, prioritized, and revised to reflect the most salient fair housing issues.	**See revised Contributing Factors analysis beginning on page C-87. See also revised Program 12, pages HE-110 to HE-112.**
Goals, Priorities, Metrics, and Milestones: The element largely did not address this finding. The element must add, or revise programs based on a complete analysis, listing, and prioritization of contributing factors to fair housing issues. Goals and actions must significantly seek to overcome contributing factors to fair housing issues and include metrics and milestones to target meaningful fair housing results. Currently, the element identifies outreach-focused programs to encourage and promote affordable housing; however, most of these programs do not appear to facilitate meaningful change nor address affirmatively furthering fair housing (AFFH) requirements, including metrics or targeted numerical outcomes. Given that the city is significantly whiter and wealthier than the region, the element could focus on programs that enhance housing mobility and encourage development of more affordable housing choices in an inclusive	**See revised Program 12, pages HE-110 to HE-112 that prioritizes programs for housing and rental assistance to address housing mobility and choices, which are hampered by income disparities, and quantifies education, outreach, and assistance. Note, however, that San Clemente does not have any High Opportunity areas like communities such as Yorba Linda and Jurupa Valley.**

manner throughout the community. Furthermore, the element should include programs with substantial place-based investments and protection against displacement in areas of increased segregation and poverty.

2. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Small Sites: The element was not revised to address this requirement. Please see HCD's prior review.

See revised Table 4-4, pages HE-80 to HE-85. Lower-income designations have been removed from "small sites."

Environmental and Other Constraints: While the element now notes some sites have environmental impacts and mitigation measures would result in less than significant impacts. As noted in the prior HCD review, several sites appear to have conditions that may impede or preclude development and the element should include analysis as appropriate. Please see HCD's prior review.

See pages HE-101 to HE-102 for additional detail regarding sites with potential impacts and mitigation measures. Note that there are no conditions that preclude development on the sites.

Suitability of Nonvacant Sites: The element was not revised to address this requirement. Please see HCD's prior review.

See pages HE-86 to HE-89, including Table 4-5, for detailed analysis of non-vacant sites. City staff followed HCD's verbal direction to provide examples of redevelopment of non-vacant sites from San Clemente and similar coastal cities (Table 4-5).

Electronic Site Inventory: As noted in the prior review, pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory and submit an electronic version of the sites inventory. As of today, HCD has not received an electronic version of the sites inventory and the form must be submitted. Any future re-adopted versions of the element must also submit the electronic version of the sites inventory.

The electronic site inventory is enclosed.

Zoning for a Variety of Housing Types (Emergency Shelters): The element now includes some information about capacity within the identified zone for emergency shelters and a brief mention of unsuccessful past interest in the zone. However, the element generally does not address the findings from the prior review. Please see HCD's prior review.

The City provided a detailed analysis in the previous letter. However, HCD provided verbal direction to include that analysis in the Housing Element, since HCD does not review the letters, only the Housing Elements. See pages HE-42 to HE-48 for a detailed, including the analysis regarding expansion of the Overlay. See page HE-117 for the Emergency Shelter program - the first objective is included to address a public comment received during a one-on-one outreach call; the last bullet point was added to address direction from HCD and public comments and includes analysis of development standards. Page HE-117 was revised to analyze the Overlay sooner, in 2024 instead of 2025, to address public comments.

3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures… (Gov. Code, § 65583, subd. (a)(5).)*

Land-Use Controls: The element was not revised to address this requirement. Please see HCD's prior review.

See pages HE-50 to HE-51 for analysis of height limits and lot coverage in mixed-use and affordable housing overlay areas. See pages HE-54 to HE-55 for an expanded discussion of cumulative impacts. See pages HE-106 to HE-107, HE-109, and HE-116 for programs to analyze and address constraints.

Local Processing and Permit Procedures: The element must describe and analyze its written procedures for compliance with SB35 to streamline ministerial approval for eligible

projects. For additional information, see the Updated Streamlined Ministerial Approval Process Government Code Section 65913.4 Guidelines at https://www.hcd.ca.gov/policy-research/docs/sb-35-guidelines-update-final.pdf.

See pages HE-61 to HE-62 for analysis of SB 35, and page HE-107 for a program to provide procedures.

Constraints on housing for Persons with Disabilities: The element now lists conditional use permit (CUP) findings for group homes for seven or more persons and states a reasonable accommodation request can be uses to provide exception. However, the element should evaluate the findings as constraints and include programs to address the procedure as a constraint to objectively facilitate approval certainty for these housing types, without exception processes such as a reasonable accommodation procedure.

See page HE-116 for a program to address residential facilities for seven or more persons.

4. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)*

Developed Densities and Permit Times: The element now includes information on time between receiving approvals and building permits but must still analyze requests to develop housing at densities below those anticipated in the sites inventory.

See page HE-75 identifying potential development density for sites inventory. See pages HE-59, HE-71, HE-78 for added language regarding housing proposed at densities below those anticipated. See Table 4-4 (pages HE-80 to HE-85) and revised Table 4-6 (pages HE-91 to HE-98) for the column that identifies the development potential.

B. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding A2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the 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, Program 15 should be revised based on a complete analysis as described in Finding A2 and should be expanded as described in HCD's prior review.

See notes next to Finding A2 above.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of*

housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)

As noted in Finding(s) A3 and A4, the element requires a complete analysis of potential governmental and nongovernmental 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.

See notes next to Findings A3 and A4 above.

In addition, the element now includes actions in Program 14 (Zoning Ordinance Amendments) to address the CUP for multifamily uses in multifamily zones as a constraint. However, the action will only remove the CUP if a project meets certain conditions, potentially raising additional constraints and uncertainty. The Program should either specify these conditions to ensure no constraints on multifamily uses or remove the clause.

See page HE-116 for revision.

4. *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. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs.

See notes next to Finding A1 above.

5. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)*

Program 17 (Preserve At-risk Housing) now includes information on other at-risk units but as noted in the prior review, it must still be revised to include tenant education and assistance and assistance with funding, such as supporting applications by nonprofits for funding to purchase at-risk units.

See Program 17, page HE-119, which describes the City's proactive actions to meet with and support MECH. See also additional objectives for tenant education and assistance, and nonprofit support.

C. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

While the element includes new objectives for at-risk preservation, objectives should still be expanded as described in the prior review.

See page HE-119. Objective for conversions have been added.

D. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)

The element adds more information on public participation such as workshops, discussions and the availability of the draft housing element but it must still demonstrate how public comments were considered and incorporated in the element.

As provided in the previous version, responses to public comments are provided on pages A-45 to A-46. See page A-46 for expanded response to public comments. See also new text throughout the revised Housing Element which was added to address additional public comments from housing advocates.