

June 3, 2021

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

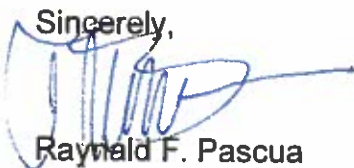
**RE: City of Villa Park Revised Draft 6<sup>th</sup> Cycle Housing Element Submittal**

Dear Ms. Kirkeby:

Enclosed for your review is the City of Villa Park's revised draft Housing Element for the 6<sup>th</sup> planning cycle. This draft incorporates revisions to address the comments in your review letter of February 19, 2021. Also attached is a summary table of revisions to assist in your review.

If you have any questions please contact our consultant John Douglas at [John@JHDPlanning.net](mailto:John@JHDPlanning.net) or 714-803-2860, or me at [ray@villapark.org](mailto:ray@villapark.org) or 714-998-1500.

Sincerely,



Raynald F. Pascua  
Planning Manager

Cc: John Douglas, Consultant

Enclosures: Revised Draft Villa Park 2021-2029 Housing Element Update  
Summary of HCD comments and revisions to the draft Housing Element

**IV. HOUSING**

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**I. INTRODUCTION**

**A. Purpose of the Element**

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

**B. State Housing Law Requirements**

The State Government Code describes the Housing Element as follows:

*The Housing Element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement and development of housing. The Housing Element shall identify adequate sites for housing, including rental housing, factory-built housing and mobile homes and shall make adequate provision for the existing and projected needs of all economic segments of the community.*

Housing elements have been a required part of city General Plans since 1967. State law requires that the Housing Element be updated periodically, and this Housing Element covers the 2021-2029 planning period, also referred to as the “6<sup>th</sup> cycle” in reference to the six required Housing Element updates since the comprehensive revision to State Housing Element law in 1980.<sup>1</sup> The Housing Element provides information on the City’s housing needs, resources and constraints; and establishes goals, policies, programs and objectives to address current circumstances and needs.

**C. Relationship to Other Elements**

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

State law requires that all elements of the General Plan be internally consistent. In addition, Government Code Sec. 65302 requires that the Safety and Conservation elements be reviewed and updated as necessary to reflect current flood hazard and management information upon the next revision of the Housing Element after January 1, 2009. The City

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<sup>1</sup> Chapter 1143, Statutes of 1980 (AB 2853)

last updated the Safety and Conservation elements in 2019 and will ensure compliance with this requirement concurrent with the 2021 Housing Element update. As part of the Housing Element update process, the City will also review other General Plan elements and if any conflicts between the updated Housing Element and other elements are identified, appropriate amendments will be processed to ensure that consistency is maintained.

**D. Community Overview**

*Regional Setting*

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

*Local Setting*

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

**E. CITIZEN PARTICIPATION**

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

- The City notified by letter and solicited input on the Draft Housing Element from a variety of groups and non-profit housing organizations representing the interests of lower-income households and persons with special needs.
- The City Council conducted four public meetings to discuss the Draft Housing Element Update and take public input on December 15, 2020, March 9, 2021, April 13, 2021 and May 11, 2021.

- Copies of the Draft Housing Element were available at the local library, City Hall and on the City’s website.
- On April 19, 2021, the City mailed out informational packets on the Housing Element update, potential affordable housing options, and City Council public hearing details to all Villa Park residents and property owners. Copies of the informational package were also posted on the City website and hard copies were made available in City Hall.
- Public notice of each public hearing held by the City Council and the availability of the draft Housing Element was published in the local newspaper and sent to all homeowners’ associations, interested organizations and various State and Local Agencies.

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

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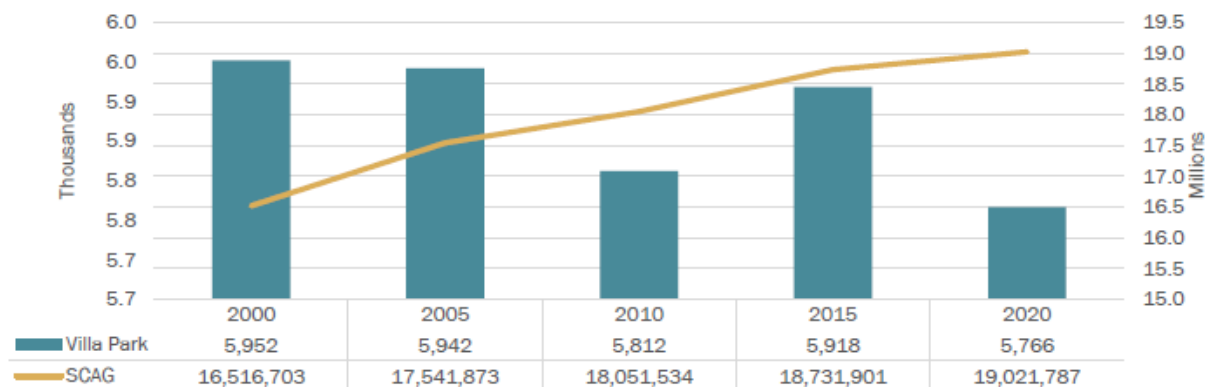
## II. HOUSING NEEDS ASSESSMENT

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

### A. Population

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

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



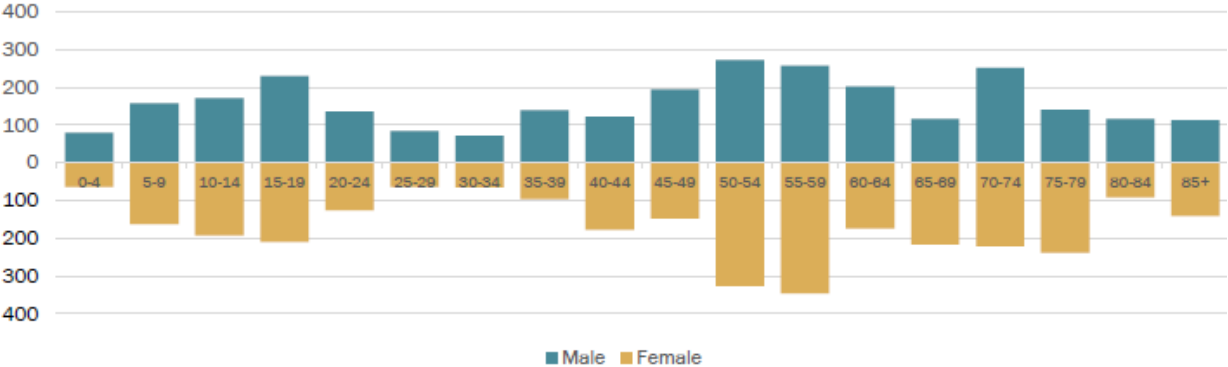
CA DOF E-5 Population and Housing Unit Estimates

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

<sup>2</sup> HCD letter to SCAG dated August 27, 2020

([http://www.scag.ca.gov/programs/Documents/LHD/HCD\\_PreCertified\\_LocalHousingData\\_Letter082720.pdf](http://www.scag.ca.gov/programs/Documents/LHD/HCD_PreCertified_LocalHousingData_Letter082720.pdf))

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



American Community Survey 2014-2018 5-year estimates

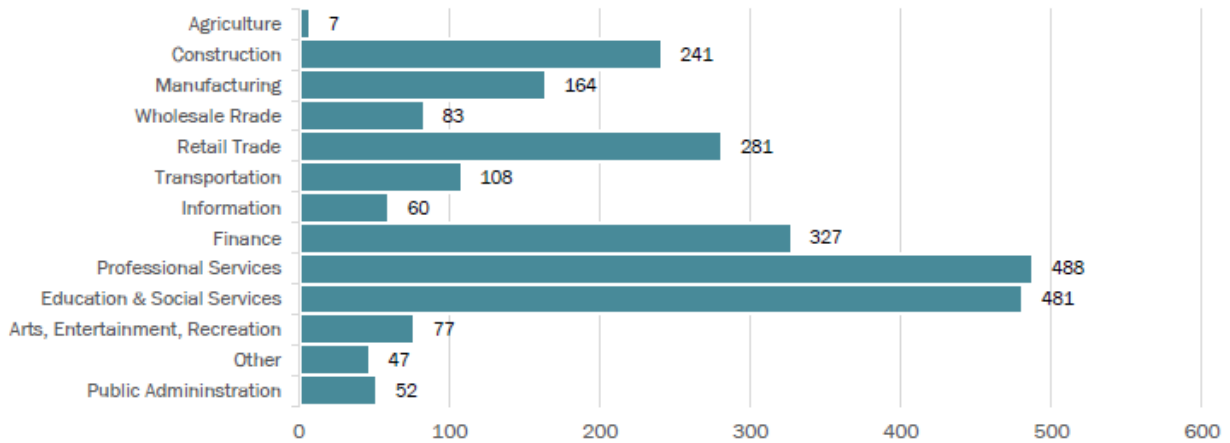
**B. Employment**

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

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

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

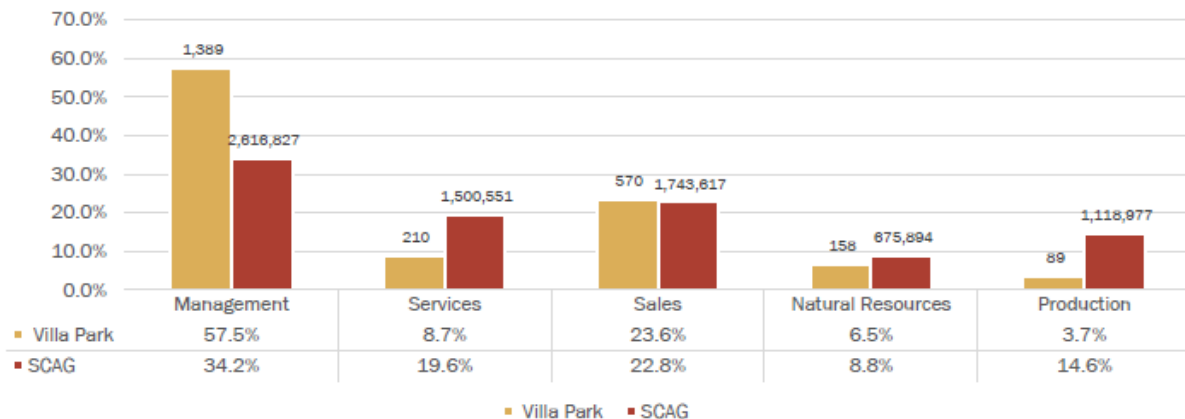
**Figure IV-3  
Employment by Industry  
Villa Park**



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

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

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



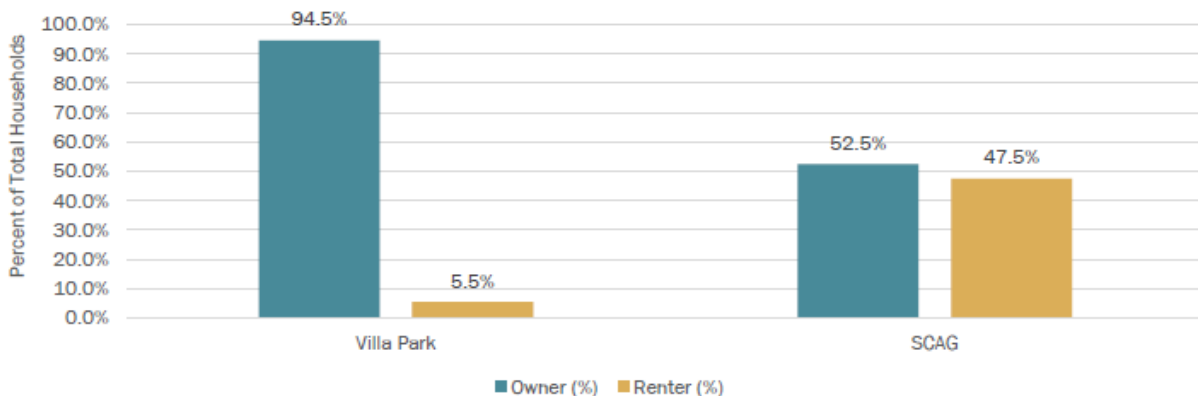
American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

C. Household Characteristics

Tenure

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

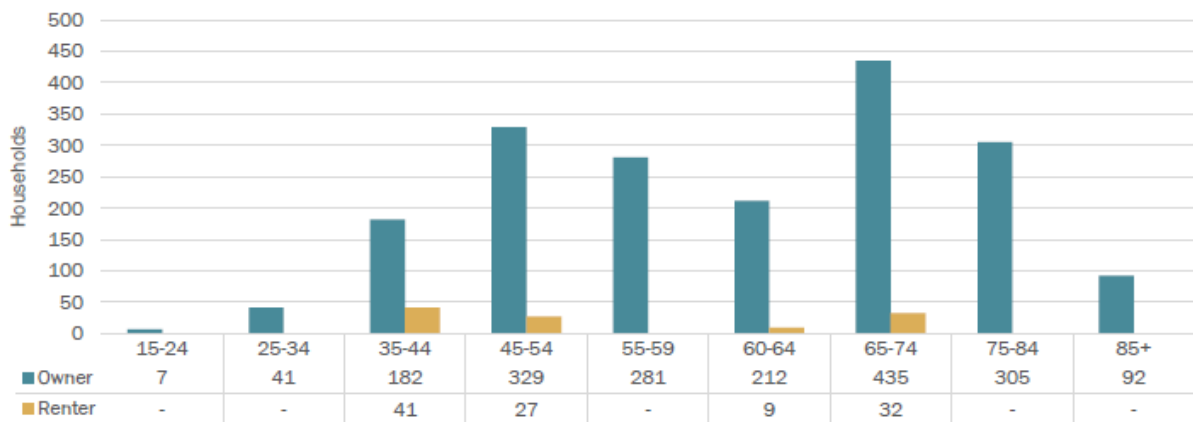
**Figure IV-5  
Housing Tenure  
Villa Park and SCAG Region**



American Community Survey 2014-2018 5-year estimates.

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

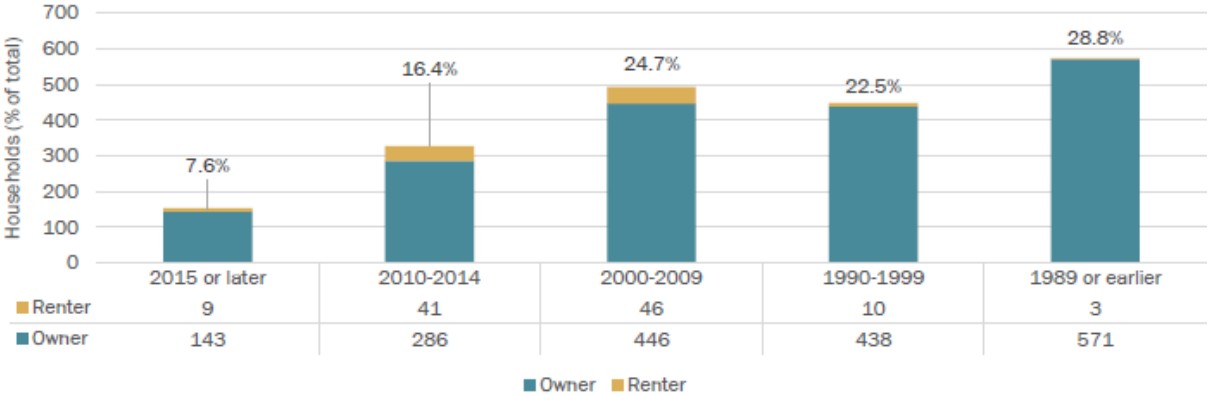
**Figure IV-6  
Housing Tenure by Age  
Villa Park**



American Community Survey 2014-2018 5-year estimates.

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

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

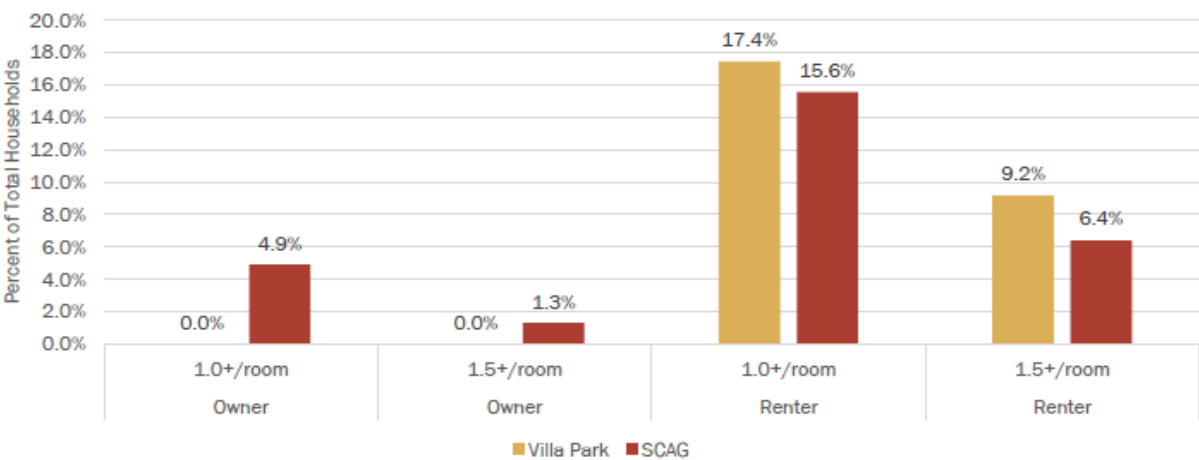


American Community Survey 2014-2018 5-year estimates.

**Overcrowding**

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

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



American Community Survey 2014-2018 5-year estimates.

Income and Overpayment

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

The following income categories are used in Housing Element analyses:

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

State and federal standards consider a household to be overpaying for housing (also referred to as *cost-burdened*) if more than 30% of its gross income is spent on housing. A household spending more than this amount for housing has less money available for other necessities and emergency expenditures. Extremely-low-income and very-low-income households overpaying for housing are more likely to be at risk of becoming homeless than other households. Renter households typically overpay more often than owner households

because of their lower incomes. Compared to renters, overpayment by owners is generally less of a concern because homeowners may have options such as refinancing a mortgage when interest rates drop, or selling the house and moving into a rental unit or buying a less expensive home.

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

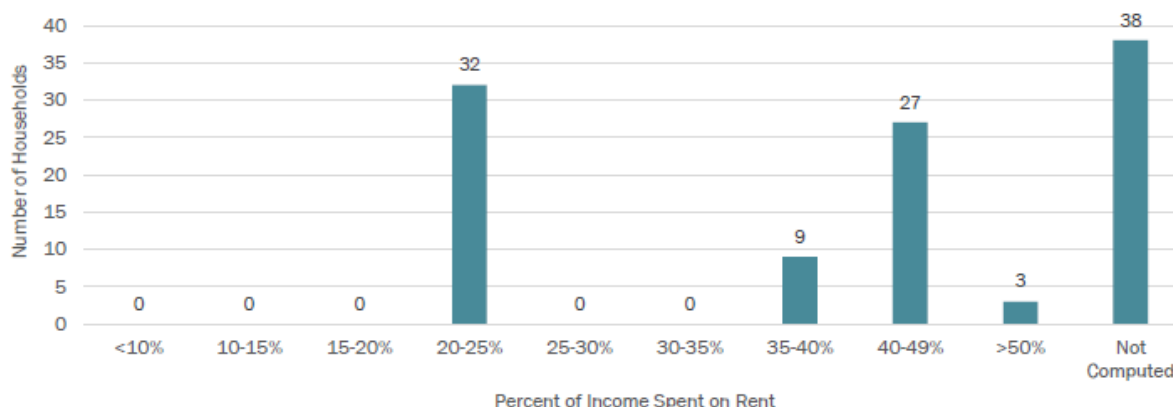
**Figure IV-9  
Overpayment by Income Category  
Villa Park**

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

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

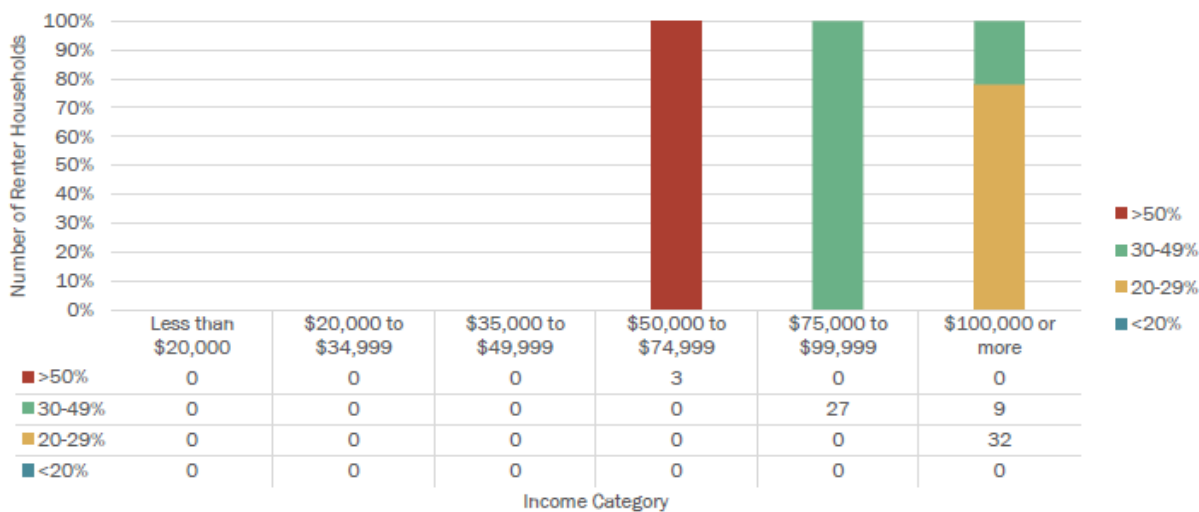
Among Villa Park's 109 renter households, 39 (35.8%) spent 30% or more of gross income on housing cost, compared to 55.3% in the SCAG region. Additionally, 3 renter households in Villa Park (2.8%) spent 50% or more of gross income on housing cost, compared to 28.9% in the SCAG region (Figure IV-10).

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



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

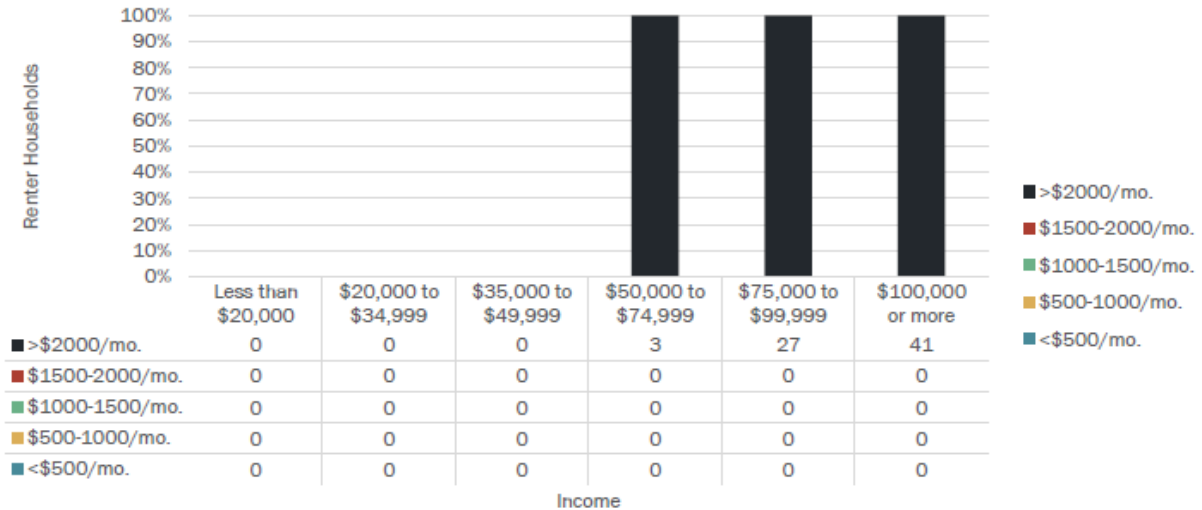
**Figure IV-11  
Percentage of Income Spent on Rent by Income Category  
Villa Park**



American Community Survey 2014-2018 5-year estimates.

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

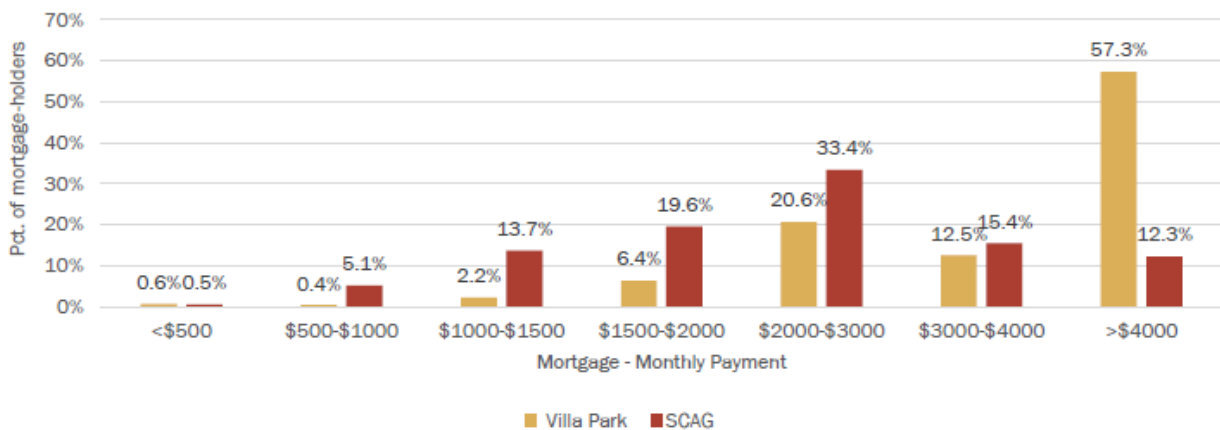
**Figure IV-12  
Household Income by Rent  
Villa Park**



American Community Survey 2014-2018 5-year estimates.

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

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



American Community Survey 2014-2018 5-year estimates.

Mortgage-holding households in Villa Park can be broken down by income and the percentage of income spent on mortgage costs. As one might expect, the general trend is

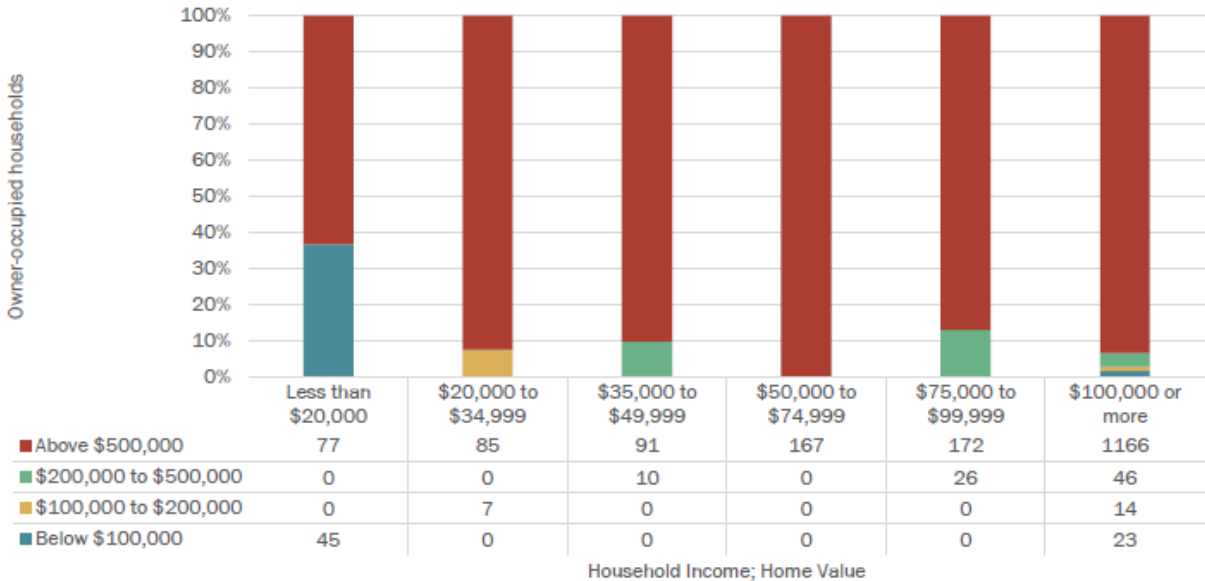
that lower-income households spend a higher share of income on housing costs, while high-income households may spend a lower share of income on housing. As seen in Figure IV-14, the income category most prevalent amongst Villa Park mortgage-holding households is \$75,000 or more (1,017 households) and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

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



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

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



*Extremely-Low-Income Households*

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

Existing Needs

As noted in Figure IV-16, recent Census data estimated that there were 103 ELI households in Villa Park. Of these, 75 (73%) were reported as overpaying for housing.

Projected Needs

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

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

analysis and resources for these households can be found in the Special Needs and Constraints sections.

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

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

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

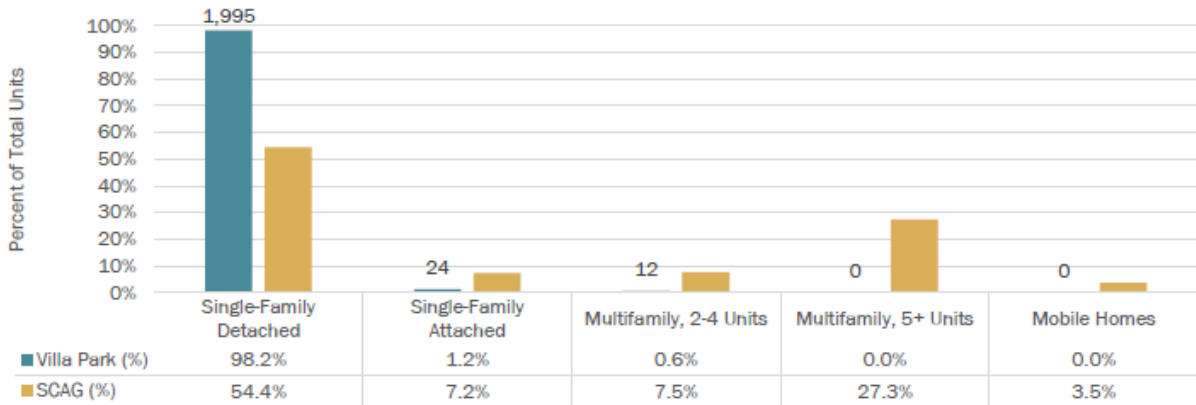
*HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.*

**D. Housing Stock Characteristics**

*Housing Units by Type*

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

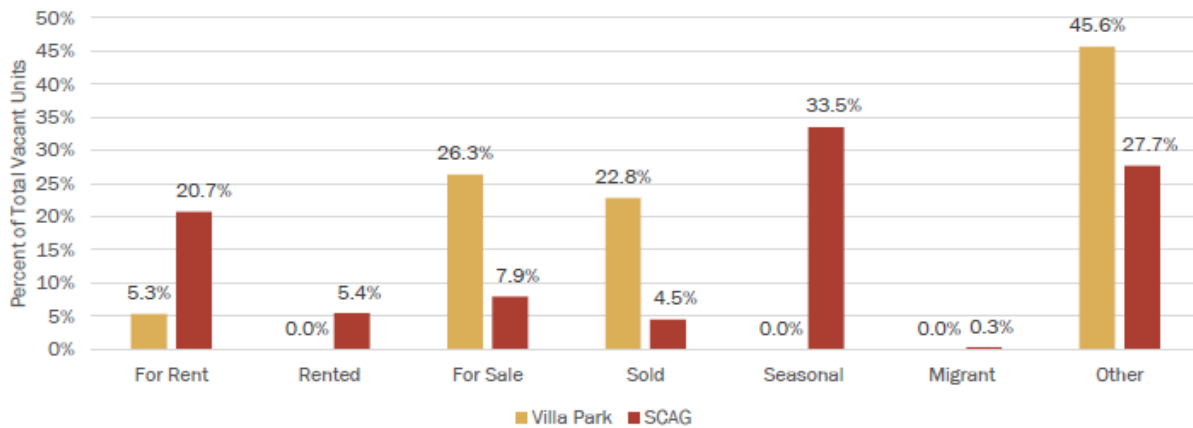
**Figure IV-17  
Housing Stock Characteristics  
Villa Park and SCAG Region**



CA DOF E-5 Population and Housing Unit Estimates

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

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

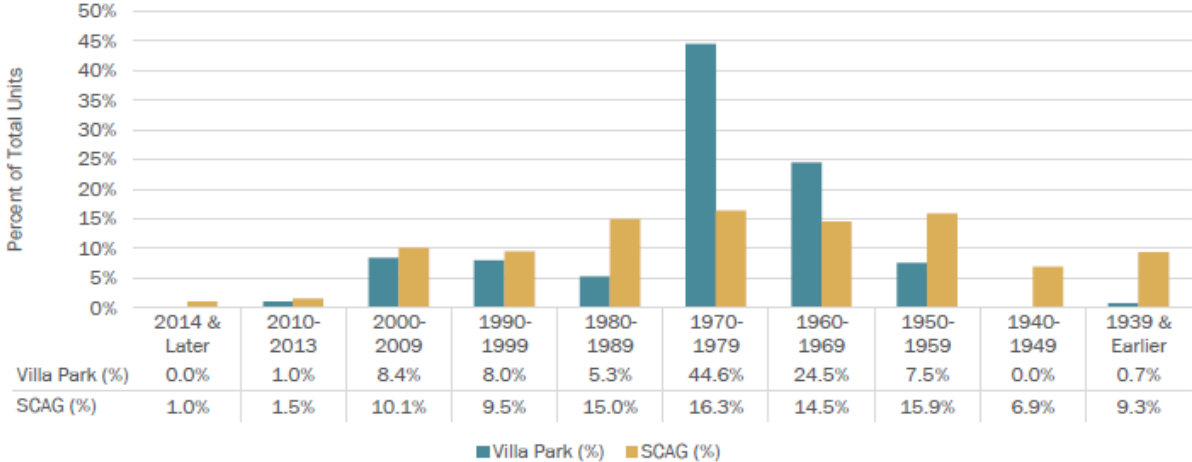


American Community Survey 2014-2018 5-year estimates.

**Housing Conditions**

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

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



American Community Survey 2014-2018 5-year estimates.

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

*Deteriorating* – not more than two intermediate (slight) defects or one major defect but still providing safe and adequate shelter.

*Dilapidated* – several intermediate defects or a critical defect plus extensive evidence of neglect or serious damage.

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

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

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



*American Community Survey 2014-2018 5-year estimates.*

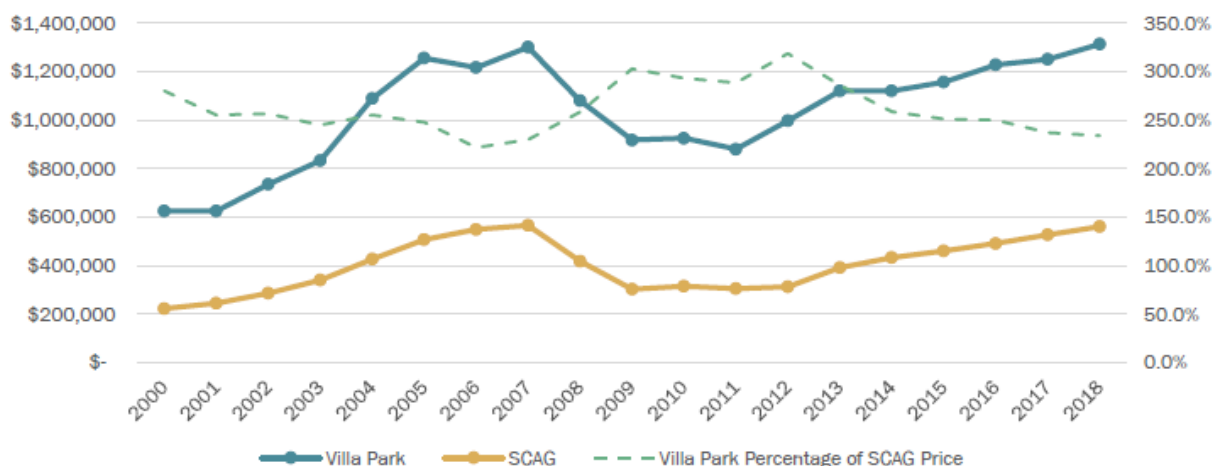
Considering the high home values and community pride in Villa Park, substandard housing conditions are uncommon. When considering historical maintenance of existing housing during the program period, it is believed that there are no housing units with substandard conditions that would require the replacement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

*Housing Costs and Affordability*

Home Price Trends

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

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



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

### Rental Prices

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

### Affordability Gap Analysis

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

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

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

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

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

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

**E. Special Housing Needs**

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

*Elderly Persons*

Federal housing data define a household type as *elderly family* if it consists of two persons with either or both age 62 or over. Elderly persons are considered a special needs group because they are more likely to have fixed incomes and often have special needs related to housing location and construction. Because of limited mobility, elderly persons may need convenient access to services (e.g., medical and shopping) and public transit. Of Villa Park's 823 elderly households, 6% earned less than 30% of the countywide median income, (compared to 24.2% in the SCAG region), while 19.9% earned less than 50% of the median income (compared to 30.9% in the SCAG region). (Figure IV-23).

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

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

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

*Large Households*

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

**Figure IV-24  
Household Size by Tenure  
Villa Park**

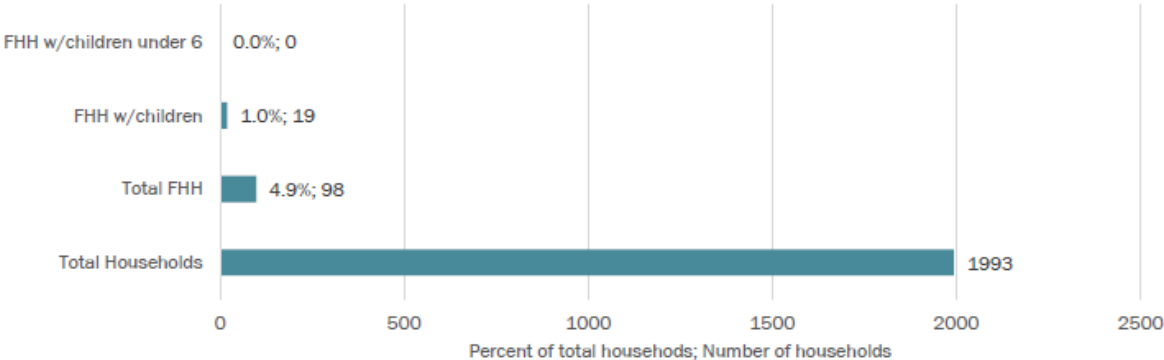


American Community Survey 2014-2018 5-year estimates.

Female-Headed Households

Female-headed households are a special needs group due to comparatively low rates of homeownership, lower incomes, and higher poverty rates experienced by this group. Of Villa Park's 1,993 total households, 4.9% are female-headed (compared to 14.3% in the SCAG region), 1% are female-headed and with children (compared to 6.6% in the SCAG region), and no female-headed households were reported with children under 6 (compared to 1.0% in the SCAG region) (Figure IV-25).

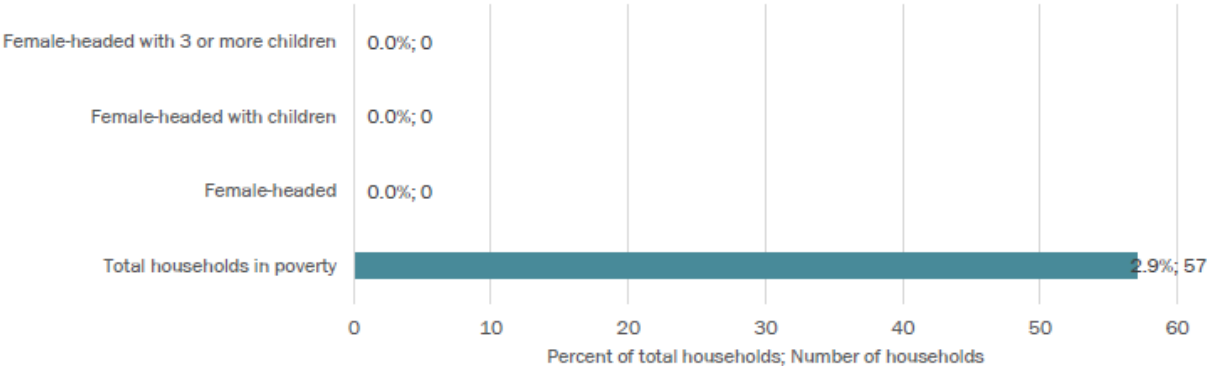
Figure IV-25  
Female Headed Households  
Villa Park



American Community Survey 2014-2018 5-year estimates.

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

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

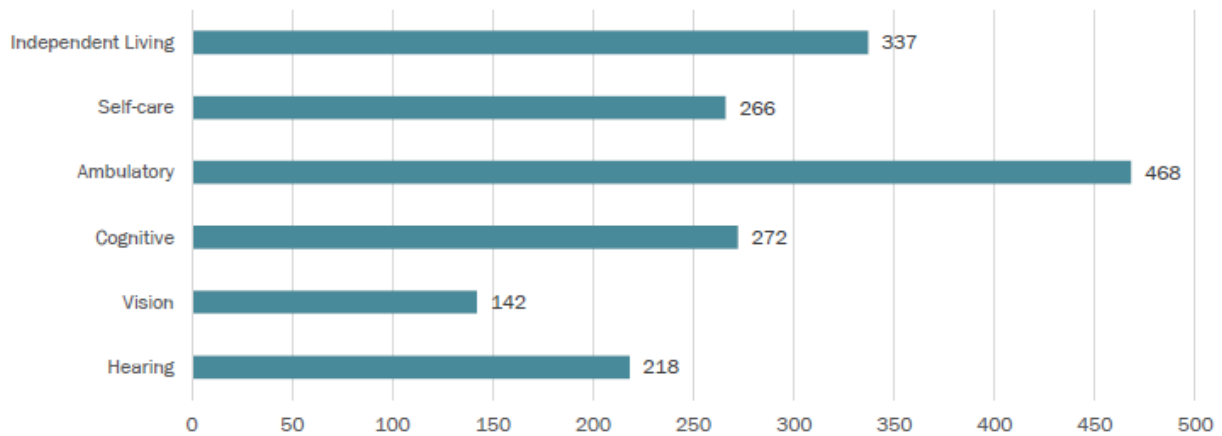


American Community Survey 2014-2018 5-year estimates.

*Persons with Disabilities*

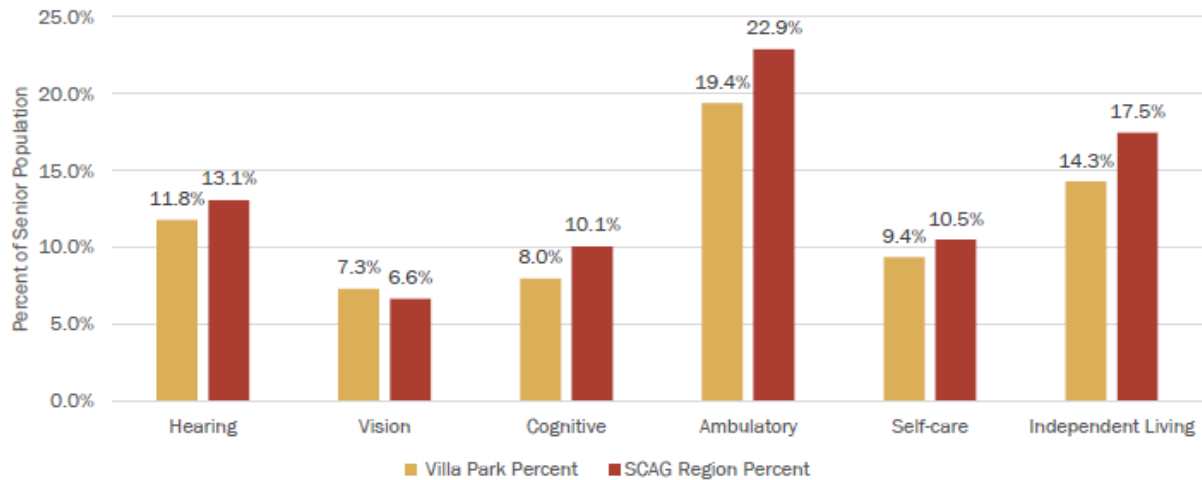
Access and affordability are the two major housing needs for persons with disabilities. This often requires specially-designed dwelling units, and disability data provides valuable context for assessing current and future need for accessible housing units. Additionally, locating housing near public facilities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

**Figure IV-27  
Disabilities by Type  
Villa Park**



American Community Survey 2014-2018 5-year estimates.

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



American Community Survey 2014-2018 5-year estimates.

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

Figure IV-29  
Disabilities by Employment Status  
Villa Park

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

American Community Survey 2014-2018 5-year estimates.

Developmental Disabilities

As defined by federal law, “developmental disability” means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency;
- Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

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

The California Department of Developmental Services (DDS) currently provides community-based services to persons with developmental disabilities and their families through a

statewide system of 21 regional centers, four developmental centers, and two community-based facilities. The Regional Center of Orange County (RCOC) provides point of entry to services for people with developmental disabilities in Orange County. The RCOC is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

Any resident of Orange County who has a developmental disability that originated before age 18 is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans and may include: Adult day programs; advocacy; assessment/consultation; behavior management programs; diagnosis and evaluation; independent living services; infant development programs; information and referrals; mobility training; prenatal diagnosis; residential care; respite care; physical and occupational therapy; transportation; consumer, family vendor training; and vocational training. RCOC also coordinates the State-mandated Early Start program, which provides services for children under age three who have or are at substantial risk of having a developmental disability. The RCOC currently serves approximately 22,000 residents with developmental disabilities and their families.<sup>5</sup>

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

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

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<sup>5</sup> <https://www.rcocdd.com/>

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

Table with 2 columns: Residence/Age Category and Villa Park Count. Rows include: Home of Parent/Family/Guardian (293), Independent/Supported Living (16), Community Care Facility (35), Intermediate Care Facility (5), Foster/Family Home (5), Other (0), 0 - 17 Years (354), 18+ Years (161), and TOTAL (869).

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

Homeless Population

According to the 2019 "Point-in-Time" survey of the homeless population there were no homeless persons reported in Villa Park. Senate Bill (SB) 2 of 2007 requires that jurisdictions quantify the need for emergency shelter and determine whether existing facilities are adequate to serve the need.

Farm Workers

Statewide, farmworker housing is of unique concern and importance. While only a small share of SCAG region jurisdictions have a significant number of farmworkers living in them, they are essential to the region's economy and food supply.

**Figure IV-31  
Farmworkers by Occupation  
Villa Park**

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

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

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

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

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

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

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

**G. Regional Housing Need Assessment (RHNA)**

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

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

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

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

Notes:  
\*Extremely Low-Income need is assumed to be 50% of Very Low-Income need  
Source: SCAG 2021

III. HOUSING RESOURCES AND OPPORTUNITIES

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

A. Land Resources to Accommodate New Housing Needs

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

Regional Housing Needs Assessment

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

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

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

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

Sites to Accommodate New Housing Needs

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

Lower-Income Sites

Villa Park is the smallest city in Orange County and was incorporated in 1962. It has an area of only 2.1 square miles and is about 99% developed with single-family homes, most of which were built more than 30 years ago. Only a handful of vacant lots remain, which are suitable only for low-density development due to topography and access issues. With the exception of one commercial center of approximately 10 acres, the City is zoned entirely for single-family residences.

The Town Center provides an important opportunity for affordable housing. This commercial center is centrally located in the community and includes a grocery store, banks, a pharmacy with a postal substation, a variety of specialty shops and offices, City Hall and community room, and a branch of the Orange County Public Library. The two parcels at the northeast corner of the center containing City Hall, the library and an office building are zoned to allow multi-family housing or mixed-use development at a density of 20 to 24 units/acre. The City Hall/library is a single-story building with approximately 5,523 square feet (FAR 0.26) while the office building is two stories and approximately 13,254 square feet (FAR 0.33). At the minimum density of 20 units/acre, these parcels can accommodate 28 units and are suitable for redevelopment in the planning period due to the age of structures and low existing building floor area ratio compared to allowable coverage under zoning standards. Higher density is possible under density bonus law if affordable units are included. Given the current strong residential real estate market, residential development on these parcels is considered highly feasible.

Another significant opportunity for affordable multi-family housing exists on a vacant parcel owned by the Orange County Water District (Figure IV-35). This parcel is approximately 17 acres in size and is currently zoned OCFCD and designated Open Space in the General Plan. Due to site constraints, it is assumed that future development would occur on a portion of the parcel with the remainder set aside for drainage and habitat conservation purposes. Since housing is not currently allowed on this property, Program 1 includes a commitment to process General Plan and zoning amendments to allow multi-family housing at appropriate densities pursuant to Government Code Sec. 65583.2(h).

Accessory dwelling units (ADUs) also provide significant opportunities for lower-income housing. As discussed in the Constraints chapter, the City permits two accessory units per parcel (one ADU plus one JADU) by-right. Given the low-density single-family character of

the city and the very limited amount of land available for new development, ADUs are an important option for affordable housing. It is likely that some ADUs are occupied by family members or household employees with no rent charged, and therefore qualify as extremely-low-income units. ADUs rented at market rates are likely affordable to low- or moderate-income households. Based on 2020 income limits<sup>6</sup> published by HCD, affordable monthly rent for a 2-person household in Orange County is \$2,050 per month at the low-income level and \$2,472 at the moderate-income level. A recent survey<sup>7</sup> of apartments advertised for rent found 1-bedroom apartments near Villa Park typically ranging from \$1,500 to \$2,000 per month.

In addition, a recent SCAG study<sup>8</sup> of ADU affordability concluded that the following assumptions for ADU affordability are appropriate for Orange County:

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

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

The City approved development of 12 ADUs during calendar year 2020, a substantial increase from only one ADU in 2019. In consideration of recent changes to State ADU law and proposed City policies to encourage ADU development (see Program 2 in Section V) the land inventory assumes that ADU construction will continue at this pace, generating approximately 80 additional units during the planning period as shown in Figure IV-34.

#### *Moderate and Above-Moderate Income Sites*

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

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

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<sup>6</sup> <https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2020.pdf>

<sup>7</sup> [www.rent.com](http://www.rent.com) accessed 11/20/2020

<sup>8</sup> Southern California Association of Governments, SCAG Regional Accessory Dwelling Unit Affordability Analysis, 12.2020

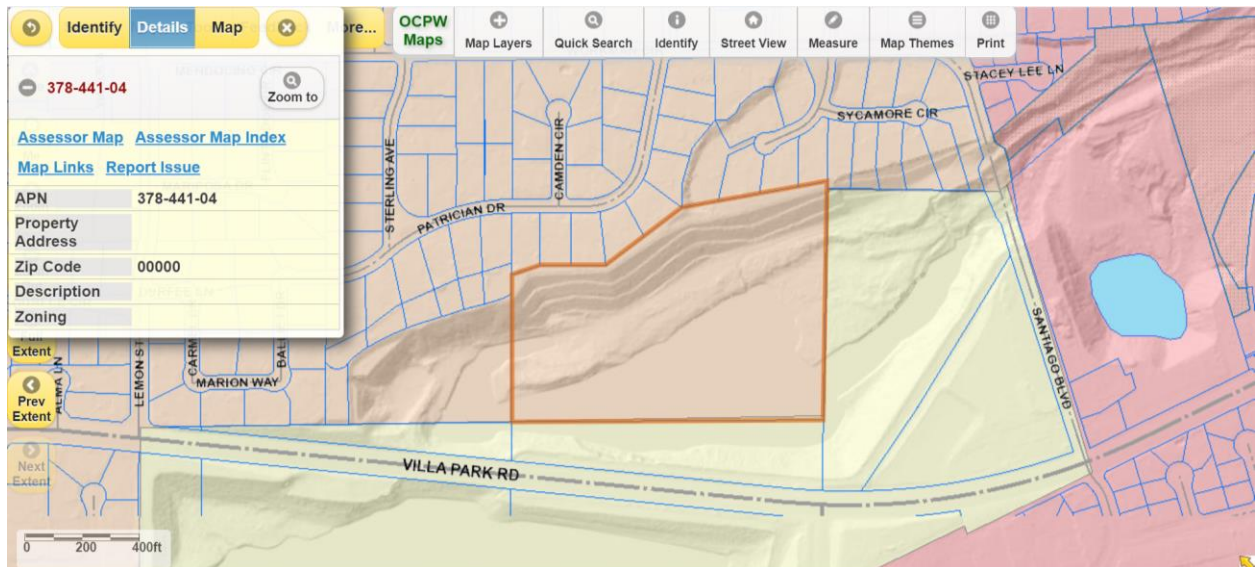
*Affirmatively Furthering Fair Housing*

The inventory of sites for additional housing development affirmatively furthers fair housing by creating additional housing opportunities at all income levels throughout the city. Lower-income housing opportunities are provided through ADUs in all residential zones, as well as in the Town Center and the OCWD parcel.

**Figure IV-34  
Residential Sites Inventory**

APN	Address	General Plan	Zoning	Site Size (Acres)	Existing Use	Potential Additional Units				Potential Constraints
						VL	Low	Mod	Above	
<b>Towne Centre</b>										
372-232-10	17855 Santiago	Commercial	Com/Prof	0.49	City Hall/ Library	10				Existing 1-story building (FAR 0.26) approx. 45 yrs old
372-232-17	17871 Santiago	Commercial	Com/Prof	0.92	Professional Offices	18				Existing 2-story office building (FAR 0.33) approx. 45 yrs old
Subtotal				1.41		28				
ADUs	Various					20	34	24	2	
<b>Parcels to be Rezoned</b>										
378-441-04	No address	Open Space	OCFCD	17.7	Vacant	52	31	41	236	Owned by OCWD Topography, flood zone, habitat
<b>Totals</b>						<b>100</b>	<b>65</b>	<b>65</b>	<b>238</b>	
<b>RHNA</b>						<b>93</b>	<b>60</b>	<b>61</b>	<b>82</b>	

Figure IV-35  
OCWD Parcel



**B. Opportunities for Energy Conservation**

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

The City recognizes that there are several ways to achieve energy conservation in new and existing housing. All modifications to existing residential structures must meet current Title 24 Energy Conservation Standards. In order to encourage solar installation, the City does not charge planning fees and offers an expedited review process for solar installations. The City has seen a large increase in solar installation in recent years.

With no economic development function or Housing Department, it is not financially feasible at this time for Villa Park to provide other incentives to encourage green building techniques and materials in new and resale homes, or energy conserving retrofits. However, it is the intent to actively encourage such techniques and to direct interested parties to applicable information sources.



**IV. CONSTRAINTS**

**A. Governmental Constraints**

Land Use Controls

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

*General Plan Land Use Element*

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

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

*Zoning Code*

The City’s zoning regulations are found in Chapter XXIII of the Municipal Code.<sup>9</sup> In 1962, at the time of incorporation, a single “100-E4-20,000 Small Estates” Zone was adopted for the entire City. In the ensuing years, it became evident that this singular zoning district was more detrimental than beneficial to the City. For this reason, a change in zoning was adopted in order to achieve a well-balanced community and more effective land use transitions.

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

Along the westerly City border, there are approximately 79 acres zoned three dwelling units per acre. Adjacent to this section, on the easterly side of the zone, there are approximately 57 acres with a density of 2.5 dwelling units per acre. These two zones establish a gradual

<sup>9</sup> [https://library.municode.com/ca/villa\\_park/codes/code\\_of\\_ordinances](https://library.municode.com/ca/villa_park/codes/code_of_ordinances)

transition from the City of Orange into the 1.75 du/acre small estate zone. The northerly and easterly portions of the City are entirely zoned for 20,000-square-foot small estate lots.

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

Currently there are 11 zoning districts allowing residential land uses:

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

The suffix for R-1 zones indicates minimum lot size. Other single-family development standards are summarized in Figure IV-36. While the predominant land use pattern in Villa Park is relatively large single-family lots, it must be recognized that when the City incorporated in 1962 this low-density residential pattern was already established in the County zoning regulations, and relatively few vacant lots remain today.

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

**Figure IV-36  
Single-Family Residential Development Standards**

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

Multi-family and mixed-use housing is permitted in the CP zone, which is located in the northeastern portion of the Town Center. Development standards for multi-family and mixed-use developments in the CP zone are as shown in Figure IV-37.

Figure IV-37
Multi-Family and Mixed-Use Development Standards

Table with 2 columns: Standard and CP Zone. Rows include Allowable density (20 - 24 units/acre), Minimum residential floor area (50 percent), Minimum Lot Area, Width and Depth (None), Exterior Front, Side or Rear Yard Setbacks (20 ft.), Interior Yard Setbacks (None), Maximum Building Height (25 ft., or 35 ft. with approval of an Alternate Development Standard), and Off-Street Parking (Per Sec. 23-15.3\*).

\*see discussion in Zoning for Lower-Income Housing below

Zoning for Lower-Income Housing and Persons with Special Needs

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

Parking requirements for mixed-use developments are determined on the basis of a parking plan subject to approval by the City Traffic Engineer (Figure IV-38).

Figure IV-38
Multi-Family Parking Standards

Table with 2 columns: Number of Bedrooms and Minimum Required Parking Spaces. Rows include Studio (1.2), 1 (1.5), 2 (2), and 3 or more (2.4).

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

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

- ADUs and JADUs (one each) permitted on any lot zoned for residential or mixed use containing an existing or proposed single-family or multi-family structure

- ADU maximum size:
  - Detached: 1,200 square feet
  - Attached: 1,200 square feet or 50% of the primary unit, whichever is less
- JADU maximum size: 500 square feet
- Height limit: 16 feet
- Side/rear setbacks: 4 feet
- Off-street parking:
  - ADUs: 1 space
    - If an existing garage is converted to an ADU, no replacement parking required
    - Tandem parking allowed
  - JADUs: none
- Owner occupancy:
  - ADUs: Not required through 2024
  - JADUs: Owner-occupancy required (either the main unit or the JADU)
- Short-term rental: Not allowed
- Review process: By-right; 60-day time limit

Pursuant to current state law, all E-4 and R-1 zoned land within the City, which includes more than 2,000 parcels, allow an attached or detached ADU plus a JADU – a potential for more than 4,000 additional housing units. Accessory dwelling units have proven to be a very valuable housing resource for the city. Residents may construct accessory dwelling units as a housing alternative for elderly or student family members, household employees or live-in care providers.

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

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

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

The City continues to actively promote ADU construction by informing residents of the Accessory Dwelling Unit Development Program, and by maintaining low application fees, expedited processing and reasonable development standards. Program 2 in the Housing Plan includes a commitment to process an amendment to ADU regulations in conformance with recent amendments to state law. In order to maximize ADU production, Program 2 incorporates the following additional measures beyond those required in State law:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Building Codes and Enforcement

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

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

Site Improvement Requirements

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

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

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

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

Development Fees

Fees and exactions required of developers are used to support a variety of functions which include checking submitted plans to ensure public safety and defraying a fair share of the cost of public facilities. Figure IV-38 summarizes permit fees for a typical new home in Villa Park. Single-family permit fees are based on the construction of a 3,500-square-foot home with an 800 square foot garage and a 400-square-foot patio, while multi-family fees are based on a hypothetical 12-unit development with a total of 10,000 square feet (approximately 833 square feet per unit). These fees are required to defray the cost of providing public services and protecting public health and safety.

**Figure IV-38  
Typical Development Fees**

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

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

Local Processing and Permit Procedures

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

applications (single-family or multi-family) are processed completely within two to four months.

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

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

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

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

**B. Non-Governmental Constraints**

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

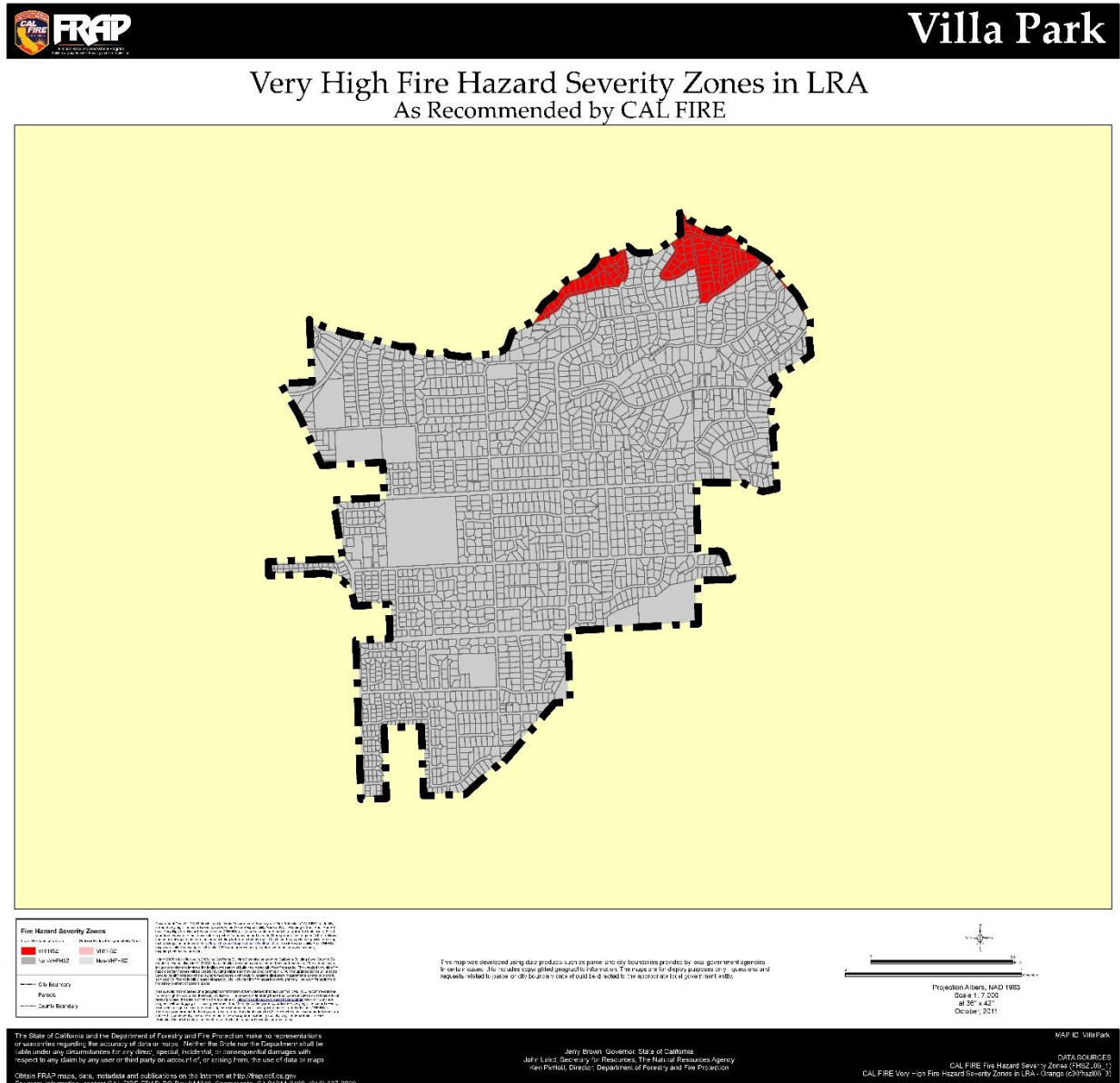
Environmental Constraints

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

- Flood hazard zones – Santiago Creek borders the city on the southeast, and some properties are within designated flood hazard zones. This constraint is mitigated by the City’s participation in the Federal Emergency Management Agency’s (FEMA) National Flood Insurance Program (NFIP).
- Geological conditions - Two earthquake faults lie within residential zoning districts. This issue is addressed through the application of the most current California Building Codes and the plan check review process.
- Fire hazard zones – as seen in Figure IV-39, a small area in the northern portion of the city is within the Very High Fire Hazard Severity Zone.

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

**Figure IV-39**  
**Very High Fire Hazard Severity Zone - Villa Park**



### Infrastructure

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

#### *Water Supply*

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

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

#### *Wastewater Collection and Treatment*

The City owns and operates a sanitary sewer system in coordination with the Orange County Sanitation District for the benefit of the residents of the community. The system was constructed primarily in the 1960s and '70s and is fully developed. The system consists of approximately 153,000 linear feet (29 miles) of collector and trunk sewer mains ranging in size from 8 to 15 inches in diameter. Some of the trunk mains are joint use mains with the City of Orange. It is estimated there are about 26 operating septic tank systems remaining in the city.

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

### Land Cost

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

### Construction Cost

Construction costs vary widely according to the type of development, with multi-family housing generally being less expensive to construct than single-family homes. However, there is wide variation within each construction type, depending on the size of the unit and the number and quality of amenities provided. In recent years, construction costs for materials and labor have increased at a higher pace than the general rate of inflation

according to the Construction Industry Research Board. The International Code Council estimates that the average cost of good quality construction is approximately \$120 per square foot for typical single-family homes, with low-rise multi-family construction somewhat lower. These costs are exclusive of the costs of land and soft costs, such as entitlements, financing, etc. In high-cost communities like Villa Park, new homes typically have a high level of amenities and features, resulting in higher than average construction cost.

#### Cost and Availability of Financing

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

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

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V. HOUSING PLAN

A. Goals and Policies

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

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

**Housing Policies:**

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

**B. Housing Programs**

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

**Program 1 Adequate Sites to Accommodate Regional Housing Needs**

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

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

As discussed in Section III.A, General Plan and zoning amendments will be processed for at least 8.4 acres of vacant land listed in Figure IV-34 to allow multi-family development pursuant to Government Code Sec. 65583.2(h). Zoning shall permit owner-occupied and

rental multi-family residential use by-right for developments in which at least 20 percent of the units are affordable to lower-income households and shall require a density of at least 20 units per acre. Rezoning shall be completed within the time period specified in Government Code Sec. 65583(c)(1)(A).

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

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

<i>Responsibility:</i>	The City Manager’s Office and Planning Department
<i>Timing:</i>	General Plan and zoning amendments by 2024
<i>Funding:</i>	General Fund
<i>Objective:</i>	Provide adequate sites to accommodate the City’s RHNA allocation

**Program 2 Accessory Dwelling Units**

Accessory dwelling units (ADUs) provide affordable housing opportunities for the elderly, household employees, disabled persons and low-income persons, as well as a source of income for retired homeowners. The City’s zoning regulations allow accessory units within all residential zones. A Zoning Code amendment will be processed in 2021 concurrently with Housing Element adoption to incorporate recent changes in State ADU law (Government Code Sec. 65852.2 and 65852.22). In order to maximize ADU development, the amendment will incorporate additional provisions beyond those required under State law including the following:

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

The City will continue to facilitate ADU construction by providing information to interested homeowners at City Hall and on the City website, and will monitor the number and affordability of new ADUs. ADU production will be monitored on an annual basis and if the City finds that ADUs are not being developed and made available at affordable rents to

lower-income households at the rate anticipated, the City will implement additional incentives to more effectively promote development of affordable accessory units within six months of the findings.

- Responsibility:* The City Manager’s Office and Planning Department
- Timing:* Annual monitoring throughout the planning period; process a Zoning Code amendment in 2021
- Funding:* General Fund; grant funds
- Objective:* Facilitate additional ADU development

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

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

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

**Program 4 Housing for Persons with Disabilities and Other Special Needs**

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

- Responsibility:* The City Manager’s Office and Planning Department
- Timing:* Municipal Code amendment in 2021
- Funding:* General Fund

*Objective:* Ensure that City regulations encourage and facilitate the provision of housing for persons with special needs in conformance with state law

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

The City will continue to monitor housing conditions and encourage property maintenance and rehabilitation through code enforcement, crime watch, and neighborhood beautification efforts. The City will include a link on the website and provide handouts indicating resources and programs available to encourage housing stock maintenance and rehabilitation. If it is determined that housing conditions are deteriorating the City will evaluate additional future actions as appropriate.

*Responsibility:* The City Manager’s Office and Planning Department  
*Timing:* Throughout the planning period  
*Funding:* General Fund  
*Objective:* Conserve and maintain existing housing

**Program 6 Equal Housing Opportunities and Affirmatively Furthering Fair Housing**

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

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

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

- Ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application’s compliance with all entitlement requirements.
- Accommodate persons with disabilities who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the applicable development regulations.

- Work with the County of Orange to implement the regional Analysis of Impediments to Fair Housing Choice and HUD Consolidated Plan.
- Facilitate public education and outreach by posting informational flyers on fair housing at public counters, libraries, and on the City’s website.
- Conduct public meetings at suitable times, accessible to persons with disabilities, and near public transit. Resources will be invested to provide interpretation and translation services when requested at public meetings when feasible.
- Encourage community and stakeholder engagement during development decisions.

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

**Program 7 Energy Efficiency**

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

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

**Program 8 Housing Element Monitoring, Reporting and Consistency Review**

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

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

**C. Quantified Objectives**

The City’s quantified objectives for the construction, rehabilitation, and conservation/preservation of housing for the 2021-2029 planning period are shown in Figure IV-40.

**Figure IV-40  
Quantified Objectives 2021-2029**

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

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**APPENDIX A**

**EVALUATION OF THE PRIOR HOUSING ELEMENT**

Section 65588(a) of the Government Code requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period.

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

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

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

Program	Responsible Agencies and Officials	Timeframe	Accomplishments and Future Actions
development opportunity and offer additional incentives such as fee reductions for projects that include units that are affordable to local employees or persons with special needs. If these activities and incentives are not effective in generating interest in redevelopment of the City Hall/Library and adjacent office properties, the City will explore and enact additional strategies to promote redevelopment of these sites within six months of the findings.		annual basis.	as described in Program 1 and notified housing providers of development opportunities in the C-P zone. A public workshop was held on July 10, 2017 to provide additional information to housing developers and other interested parties.
<p>4. <u>Housing for Persons with Disabilities and Other Special Needs.</u> The City will continue to facilitate the provision of housing for persons with special needs, including developmental disabilities, such as emergency shelters, transitional and supportive housing, and residential care facilities. Zoning Code amendments will also be processed to ensure that transitional and supportive housing are permitted subject only to the same requirements as apply to other residential dwellings of the same type in the same zone, and establish procedures for reviewing and approving requests for reasonable accommodation in conformance with fair housing law.</p>	City Manager's Office and Planning Department.	Zoning amendments in 2016	Ordinance 2016-604, adopted in 2016, amended zoning regulations to allow transitional and supportive housing in any zone where residential use is allowed subject only to the same requirements as apply to other residential dwellings of the same type in the same zone, and established procedures for reviewing and approving requests for reasonable accommodation in conformance with state law. 2 residential care facilities have been established in the city.
<p>5. <u>Encourage the Conservation and Maintenance of the City's Existing Housing Stock.</u> The City will continue to encourage property maintenance and rehabilitation through code enforcement, crime watch, and neighborhood beautification efforts. The City will include a link on the website and provide handouts indicating resources and programs available to encourage housing stock maintenance and rehabilitation.</p>	City Manager's Office and Planning Department.	Throughout the planning period	The City continued code enforcement and crime watch efforts. Information regarding housing stock maintenance and rehabilitation is provided at City Hall and on the City website.
<p>6. <u>Equal Housing Opportunities.</u> The City will advocate against discrimination in the sale, rental, or financing of housing based on race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability. Information and referrals regarding fair housing laws and rights will be posted on the City's website and in City Hall and other public buildings.</p>	City Manager's Office and Planning Department.	Throughout the planning period	Fair housing information is posted on the City's website and in City Hall and other public buildings.
<p>7. <u>Energy Efficiency.</u> The City's will continue to encourage green building techniques and promote energy audits and participation in utility energy conservation programs by posting information on the City's website and in City Hall.</p>	City Manager's Office and Planning Department.	Throughout the planning period	Information regarding green building techniques and energy conservation programs is posted on the City's website and in City Hall.

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**APPENDIX B**

**PUBLIC PARTICIPATION**

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

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

December 15, 2020	Public workshop
March 9, 2021	City Council public meeting
April 13, 2021	City Council public meeting to identify options and continue public review
May 11, 2021	City Council public meeting
_____	City Council hearing

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

**Table B-1  
Public Notice List**

Kennedy Commission  
17701 Cowan # 200  
Irvine, CA 92614

LINC Housing Corporation  
555 E. Ocean Avenue, Suite 900  
Long Beach, CA 90802

Jamboree Housing Corporation  
17701 Cowan Ave. Suite 200  
Irvine, CA 92614

Affirmed Housing Group  
13520 Evening Creek Dr. North, #160  
San Diego, CA 92128

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

So. Calif. Housing Development Corp.  
9065 Haven Avenue, Suite 100  
Rancho Cucamonga, CA 91730

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

County of Orange  
Public Works/Development Services  
300 North Flower Street  
Santa Ana, CA 92703-5000

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

Kevin Fincher  
Housing Development Administrator  
OC Community Services  
1300 S. Grand Ave., Bldg. B  
Santa Ana, CA 92705

Julia Bidwell, Director  
Housing & Community Development  
County of Orange  
1770 N. Broadway  
Santa Ana, CA 92706

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

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

Fair Housing Council  
1516 Brookhollow Drive, Suite A  
Santa Ana, CA 92705

The Related Companies  
18201 Von Karman Ave, #900  
Irvine, CA 92612

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

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

League of Women Voters  
Central Orange County Area  
P.O. Box 10621, Santa Ana, CA 92711  
COCA.LWV@gmail.com

BIA Orange County Chapter  
24 Executive Park Suite 100,  
Irvine, CA 92614

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

Comment	Response
<p>The City of Villa Park has been allocated 296 housing units of which 153 are required to be lower income units. In 2012 the City was only allocated 14 units for the 5th cycle. During this current planning period, the City has constructed none of the lower income units but has met the requirement for moderate and above moderate units. According to Villa Park’s Housing Needs Assessment, 73% of extremely-low-income households and 55% of very-low-income households were paying more than 30% of gross income for housing. The incidence of overpayment was substantially lower for households in the moderate- and above-moderate-income categories.</p> <p>The Kennedy Commission seeks to ensure that jurisdictions engage the public in revising their Housing Elements. Public engagement is a necessary component of the Housing Element process as California Housing Element law states: “The local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element...” Broad participation and true engagement of the public increases the likelihood that the community members involved in the discussion and planning processes will support new housing strategies and housing developments. Public engagement should include participation from residents of diverse communities, housing consumers, service providers, and advocates.</p> <p>As the City embarks upon the 2021-29 Housing Element update, the Commission requests that the City include us in the upcoming Housing Element review and evaluation of the current 5th cycle planning period goals, policies, and accomplishments. The Commission further requests that the City conduct a robust public participation process for the 6th cycle Housing Element update and that it incorporates the Commission, affordable housing advocates, and residents of low-income communities in this process. We believe that you will achieve a stronger Housing Element update through diverse community participation, outreach, and community planning process.</p> <p>To ensure adequate public participation the Commission recommends the following:</p> <ol style="list-style-type: none"> <li>1. The City should engage community participation and feedback at all stages of the Housing Element review and update. Participation should not be limited to public hearings.</li> <li>2. The City should allow for various methods of engagement to encourage public participation. For instance, for members of the public who may not have access to the internet or a computer, or who are unable to use video applications, consistently provide an adequate telephone option – available in multiple languages – and generally ensure that members of the community who lack adequate technology can participate in meetings about the Housing Element review.</li> <li>3. The City’s public participation and outreach opportunities should be meaningful and create various platforms (for example, virtual, written, workshops, webinars, community meetings, and public hearings) for the engagement of community members who reside in lower-income communities, affordable housing partners, Legal Aid organizations, and advocates.</li> <li>4. The City should create a diverse Housing Element Working Group to evaluate the current Housing Element policies and accomplishments. This Working Group could help create policies and recommendations for the new Housing Element update to</li> </ol>	<p>It is widely recognized that housing needs are greater than available resources to produce affordable housing. Overpayment is one of the major challenges, particularly for households at the lowest economic levels. Villa Park is one of the smallest cities in Orange County and has no capacity to provide housing subsidies to lower-income families. The best strategy for facilitating additional affordable housing is through accessory dwelling units. According to a recent SCAG study, 98% of ADUs in Orange County are assumed to be affordable to low- and moderate-income households, with over two-thirds affordable to lower-income households. Villa Park continues to facilitate ADU production as a major component of its affordable housing strategy.</p> <p>As part of the Housing Element update, the City is encouraging public participation from all economic segments of the community as well as organizations representing persons with disabilities and other special needs. Table B-1 shows the City’s notification list for all public meetings on the Housing Element and the City also maintains a website with public notices and copies of the Housing Element and other relevant materials. The City will continue to solicit comments and recommendations from all stakeholders throughout the Housing Element update process.</p>

<p>ensure that you meet the housing needs of those who are most vulnerable in the City.</p> <p>5. The City should include The Commission in any anticipated Housing Element Working Group and provide the opportunity for the Commission to provide its analysis on 5th cycle RHNA progress and be a part of developing policy recommendations on the 6th cycle update.</p> <p>6. The City should engage community organizations representing and advocating for families and individuals residing in lower-income communities to ensure that members of these communities can directly participate and that the City considers their perspective as part of the evaluation and creation of policies that create affordable housing.</p>	
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**Table B-3  
Public Comments**

	Date	Source	Initiator	Address	Comment
1)	4/20/2021	phone	Erik Reynolds	Helena Circle	Opposed to Fitschen Ranch Rezoning
2)	4/21/2021	phone	Mike Noble	Helena Circle	Opposed to Fitschen Ranch Rezoning
3)	4/22/2021	email	Mariela Rendon	Beckley Circle	Opposed to Fitschen Ranch Rezoning
4)	4/22/2021	email	Mike & Valerie Noble	Helena Circle	Opposed to Fitschen Ranch Rezoning
5)	4/22/2021	email	Isaac Novella	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
6)	4/22/2021	email	Andrea Mittelstaedt	Beckley Circle	Opposed to Fitschen Ranch Rezoning
7)	4/22/2021	email	Anne Ausmus	Portsmouth Circle	Opposed to Fitschen Ranch Rezoning
8)	4/22/2021	email	Christie Chapman	Aberdeen Lane	Opposed to Fitschen Ranch Rezoning
9)	4/23/2021	email	Ron & Mary Deibel	Lincoln Street	Opposed to Fitschen Ranch Rezoning
10)	4/23/2021	email	Jose Dalprat	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
11)	4/23/2021	email	Layra V Alcala-Dalprat	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
12)	4/24/2021	email	Betty & Billy Campbell & Leigh Skidmore	Not identified	Opposed to Fitschen Ranch Rezoning
13)	4/24/2021	email	John Whitman	Not identified	Opposed to Fitschen Ranch Rezoning & prefers Tropical Plaza/OCWD property & Town Center should be an option
14)	4/25/2021	email	Alvey W. Pratt	Helena Circle	Opposed to Fitschen Ranch Rezoning
15)	4/25/2021	email	Duc & Thuy Phan	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
16)	4/25/2021	email	Elaine Kuli	Helena Circle	Opposed to Fitschen Ranch Rezoning
17)	4/25/2021	email	Marianne Koepnick	Tacoma Circle	Opposed to Fitschen Ranch Rezoning
18)	4/26/2021	phone	Marily Leuer	Not identified	General Housing Element questions
19)	4/26/2021	email	Mary Beth Felcyn	Featherhill	Opposed to Tropical Plaza Rezoning & Prefers Town Center & Grave Pit
20)	4/26/2021	email	Dotty Farry	Fredrick Drive	Opposed to Fitschen Ranch Rezoning
21)	4/26/2021	email	Louis Pintola	Lincoln Street	Opposed to Fitschen Ranch Rezoning
22)	4/26/2021	email	Mike/Sharon Houlihan	Albany Circle	Opposed to Fitschen Ranch Rezoning
23)	4/26/2021	email	Ana Sandru	Not identified	Opposed to Fitschen Ranch Rezoning

	<b>Date</b>	<b>Source</b>	<b>Initiator</b>	<b>Address</b>	<b>Comment</b>
24)	4/26/2021	email	Bob Goldberg	Not identified	Opposed to Fitschen Ranch Rezoning
25)	4/27/2021	email	Mary Beth Felcyn	Featherhill	Questions about Tropical Plaza
26)	4/27/2021	email	Mark Kuli	Helena Circle	Opposed to Fitschen Ranch Rezoning
27)	4/26/2021	email	Keith Stoner	Miller Circle	Opposed to Fitschen Ranch Rezoning
28)	4/27/2021	email	Paul DeMarco	Not identified	Opposed to Fitschen Ranch Rezoning
29)	4/27/2021	email	Wayne Silzel	Montana Circle	Housing Element clarification
30)	4/27/2021	email	Donald V. Moser	Not identified	Opposed to Fitschen Ranch Rezoning
31)	4/27/2021	email	Ellen Turco	Prado Woods	Opposed to Fitschen Ranch Rezoning
32)	4/27/2021	email	Mr/Mrs De Marco	Beardsley Circle	Opposed to Fitschen Ranch Rezoning
33)	4/28/2021	email	Natalie Ulery	Not identified	Opposed to Fitschen Ranch Rezoning
34)	4/28/2021	email	Maggie/Lance Kim	Dorothy Circle	Opposed to Fitschen Ranch Rezoning
35)	4/27/2021	email	Vicki Moreno	Fredrick Drive	Opposed to Fitschen Ranch Rezoning
36)	4/28/2021	email	Susana Powell	Wulff Drive	Opposed to Fitschen Ranch Rezoning
37)	4/29/2021	letter	John Belovsky	Jackson Ave, Ora	Opposed to Fitschen Ranch Rezoning
38)	4/29/2021	letter	Alice Belovsky	Portsmouth Cir	Opposed to Fitschen Ranch Rezoning
39)	4/29/2021	Phone	Robert Cano	Patrician Drive	Opposed to VP Road Rezoning
40)	4/29/2021	email	Thomas F. Nixon	Not identified	Questions regarding the proposals
41)	4/29/2021	email	Kellie Moore	Not identified	Wanda Road petroleum line
42)	4/29/2021	email	Ann Sanmartini	Covington Circle	Opposed to Fitschen Ranch Rezoning
43)	4/29/2021	phone	Bridget Harness	Patrician Drive	Questions about Update process/options
44)	4/29/2021	email	John Sanmartini	Covington Circle	Opposed to Fitschen Ranch Rezoning
45)	4/29/2021	email	Ed Curtis	Not identified	Opposed to Fitschen Ranch Rezoning
46)	4/29/2021	email	Melinda Masters	Beckley Circle	Opposed to Fitschen Ranch Rezoning
47)	5/1/2021	email	Efrem Joelson	Providence Drive	Opposed to Fitschen Ranch Rezoning
48)	5/1/2021	email	Donna Buxton	Dodson Way	Suggested public hearing sites
49)	5/3/2021	email	Donna Buxton	Dodson Way	Requested Housing Element information
50)	5/1/2021	email	Doug & Liz Riede	Rosanne Circle	Opposed to Fitschen Ranch Rezoning
51)	4/30/2021	email	Dave Grass	CCS Computer	Passage of ACA7

	Date	Source	Initiator	Address	Comment
				Svc	
52)	5/2/2021	email	Steve/Birgit Miller	Not identified	Question regarding 8,000sf threshold
53)	5/3/2021	phone	Brad Reese	Mountain View	Questions on process
54)	5/3/2021	email	Gina Van Fleet	Not identified	Support Gravel Pit option & possibly Town Center & opposes other options
55)	5/3/2021	email	Maria Pangelinan	Brynmar Drive	Opposed to Tropical Plaza Rezoning
56)	5/3/2021	email	Bruce Kellar	Not identified	Opposed to Fitschen Ranch Rezoning
57)	5/3/2021	email	Dave Hanson	Serrano	Priority of options
58)	5/4/2021	email	Carmen Garcia	Brynmar	Opposed to Tropical Plaza Rezoning
59)	5/4/2021	email	Scott Findlay	Not identified	Opposed to Fitschen Ranch Rezoning
60)	5/4/2021	email	Fred/Louise Alexander	Brynmar Drive	Priority of options
61)	5/5/2021	phone	Nancy Lynch	Sycamore Drive	Opposed to Gravel Pit rezoning
62)	5/3/2021	email	Dr/Mrs. Neil Harness	Patrician Drive	Opposed to Gravel Pit rezoning
63)	5/3/2021	email	Melissa Helffrich	Beardsley Circle	Opposed to Fitschen Ranch Rezoning
64)	5/3/2021	email	Roger von Ting	Camden Circle	Opposed to Gravel Pit Rezoning
65)	5/3/2021	email	Greg Masters	Beckley Circle	Opposed to Fitschen Ranch Rezoning
66)	5/3/2021	email	Danie Spence	Not identified	Opposed to Fitschen Ranch Rezoning & support Gravel Pit as least impact
67)	5/3/2021	email	Henry/Eileen Cohen	Brynmar Lane	Priority of options
68)	5/3/2021	email	Wayne Silzel	Montana Circle	Shared email from Gwen MacAloney suggesting small groups of meetings on the issue
69)	5/3/2021	email	Dowling Tsai	Beckley Circle	Input on Housing Element Options & Opposed to Fitschen Ranch Rezoning
70)	5/4/2021	email	Paul Baumann	Not identified	Opposed to Fitschen Ranch Rezoning
71)	5/4/2021	email	Barry Denes	Not identified	Suggests rezoning & that all newly rezoned & future developments on newly rezoned areas be subject to voter referendum by the residents
72)	5/4/2021	email	Brian/Carolyn Watts	Maybury Ranch	Pay to build affordable housing in another City on behalf of VP - Opposed to affordable housing in VP
73)	5/4/2021	phone	Ed Loftus	Villa Drive	Opposed to rezoning within residential neighborhoods - Opposed to using 11 underdeveloped/vacant lots
74)	5/5/2021	email	Sandra Poiser	Not identified	Opposed to Fitschen Ranch Rezoning & Villa Park Road Rezoning

	Date	Source	Initiator	Address	Comment
75)	5/7/2021	email	Mary Beth Felcyn	Featherhill	Prefers Gravel Pit & Town Center options & Opposes Tropical Plaza Rezoning
76)	5/7/2021	mail	Cathy Trinh	Featherhill	Opposed to Tropical Planning Rezoning & prioritizes options
77)	5/7/2021	mail	Carol/Jack Stevens	Featherhill	Prioritizes Gravel Pit & Town Center & opposes other options
78)	5/7/2021	email	Dan Vu	Featherhill	Opposes Fitschen Ranch Rezoning & Tropical Nursery Rezoning & provides priority to other options
79)	5/7/2021	email	Mary Silzel	Montana Circle	Suggested clarification for public
80)	5/7/2021	fax	Arjun/Renee Mente	Loma Street	Expressing option preferences
81)	5/7/2021	email	Thomas Nixon	Not identified	Comments on each option
82)	5/8/2021	email	Mary Beth Felcyn	Featherhill	Supports Gravel Pit as best option
83)	5/8/2021	email	Roberta Prettyman	Hastings Drive	Opposed to Fitschen Ranch Rezoning
84)	5/8/2021	email	Erin Bartolucci	Not identified	Opposed to Fitschen Ranch Rezoning
85)	5/7/2021	email	Tom Capalbo	Dorothy Circle	Opposed to Fitschen Ranch Rezoning
86)	5/9/2021	email	Donna Buxton	Dodson	Opposed to Tropical Plaza Rezoning & Supports Gravel Pit Rezoning & Wants Commercial preserved in Town Center if Rezoned
87)	5/10/2021	email	Mr/Mrs Schimmel	Not identified	Opposed to Fitschen Ranch Rezoning
88)	5/8/2021	email	Bob Derifield	Covington Circle	Questions regarding Housing Element
89)	5/10/2021	mail	Sotirios Zafiris	Featherhill	Priority ranking of housing options
90)	5/10/2021	mail	Patricia Zafiris	Featherhill	Priority ranking of housing options
91)	5/10/2021	email	Mary Silzel	Montana Circle	Supports development of Villa Park Road senior housing facility
92)	5/10/2021	email	Mr/Mrs Watkins	Leatrice Drive	Supports Villa Park Road Rezoning
93)	5/10/2021	email	Mr/Mrs Canuso	Featherhill Drive	Prefer Villa Park Road option & portion of Town Center rezoning & opposed to Tropical Plaza Rezoning
94)	5/10/2021	email	Mr/Mrs Miller	Mesa Drive	Oppose reducing residential lot sizes for E4 lots & provides preferred options
95)	5/10/2021	email	Mr/Mrs Handorf	Aberdeen Lane	Opposes Fitschen Ranch Rezoning
96)	5/10/2021	email	Mr/Mrs Everett	Cedarhill Circle	Opposes Fitschen Ranch Rezoning
97)	5/10/2021	email	Dr. Rangwala	Not identified	Opposes Fitschen Ranch Rezoning
98)	5/10/2021	email	Stephen Miller	Mesa Drive	Spread density change evenly by revising all E-4 lots to minimum size

	<b>Date</b>	<b>Source</b>	<b>Initiator</b>	<b>Address</b>	<b>Comment</b>
99)	5/10/2021	email	John Hoganson	Not identified	Question as to Fitschen Ranch fencing
100)	5/10/2021	email	Mr/Mrs Miller	Mesa Drive	Support Villa Park Road option
101)	5/10/2021	email	Sharon Jory	Albany Circle	Opposes Fitschen Ranch Rezoning
102)	5/10/2021	email	Eric Wong	Not identified	Opposes Fitschen Ranch Rezoning
103)	5/10/2021	email	Joyce Wilson	Not identified	Supports Senior housing & Villa Park Road as first preferred option
104)	5/10/2021	email	Erica Wright	Providence Drive	Opposes Fitschen Ranch Rezoning
105)	5/10/2021	email	Wes Miyake	Helena Circle	Opposes Fitschen Ranch Rezoning
106)	5/10/2021	email	Roger Fischen	Lincoln Street	Opposes Fitschen Ranch Rezoning
107)	5/10/2021	email	Jessica Chiang	Featherhill Drive	Priorities of options, with Gravel Pit the highest preference
108)	5/10/2021	email	Cheryl Witt	Not identified	Opposes Fitschen Ranch Rezoning
109)	5/10/2021	email	Roy/Lynn Herndon	Brynmar Drive	Priorities of options, with Gravel Pit the highest preference
110)	5/10/2021	email	Kirk McMullin	Valencia Drive	Priorities of options, with Gravel Pit the highest preference
111)	5/10/2021	email	Ruben Ibarra	Aberdeen	Opposes Fitschen Ranch Rezoning
112)	5/11/2021	email	David Carson	Rosanne Circle	Opposes Fitschen Ranch Rezoning
113)	5/11/2021	phone	David Metcalf	Not identified	Opposes zoning changes for VP
114)	5/11/2021	email	Ann & Phedre Loren	Brynmar Drive	Priorities of options, with Gravel Pit the highest preference
115)	5/11/2021	email	Ryan Polk	Brynmar Drive	Priorities of options, with Town Center the highest preference
116)	5/11/2021	email	Wayne Silzel	Montana Circle	Support for Gravel Pit option
117)	5/11/2021	email	Mr/Mrs Vitichus	Cedarhill Circle	Opposes Fitschen Ranch Rezoning
118)	5/11/2021	email	Markovitz Family	Not identified	Opposes Fitschen Ranch Rezoning & provides priority options
119)	5/11/2021	email	Mark Kuli	Helena Circle	Stop Wanda Development update
120)	5/11/2021	letter	Mauricio Ospino	N Sacramento, Ora	Opposes Fitschen Ranch Rezoning
121)	5/11/2021	email	Jacqui Lawrence	Featherhill	Opposes Tropical Nursery Rezoning & prioritizes options
122)	5/11/2021	email	John Hoganson	Tacoma Circle	Opposes Fitschen Ranch Rezoning
123)	5/11/2021	email	Riki Brophy	Potter Circle	Opposes Fitschen Ranch Rezoning
124)	5/11/2021	email	Alan McNeeney	Beckley Circle	Opposes Fitschen Ranch Rezoning

	<b>Date</b>	<b>Source</b>	<b>Initiator</b>	<b>Address</b>	<b>Comment</b>
125)	5/11/2021	email	Nicole Stepanian	Lincoln Street	Opposes Fitschen Ranch Rezoning
126)	5/11/2021	email	Erick Pulido	Serrano Ave	Questions on Housing Element
127)	5/11/2021	email	David/Esther Kim	Villa Woods Cir	Opposes State Housing law & preferences for Tropical Plaza & Villa Park Road options
128)	5/11/2021	email	Jay/Christina Kimble	Dodson Way	Priorities of options, with Gravel Pit as priority
129)	5/11/2021	email	Debbie Girgenti	Not identified	Opposes Fitschen Ranch Rezoning
130)	5/11/2021	mail	Donel Belorsky	Jackson Ave, Ora	Opposes Fitschen Ranch Rezoning
131)	5/11/2021	mail	Michele Hirota	Cedarhill Circle	Opposes Fitschen Ranch Rezoning
132)	5/11/2021	mail	Lori Picco	Santiago	Opposes Fitschen Ranch Rezoning
133)	5/11/2021	mail	Billie O'Brien	Locust Ave, Ora	Opposes Fitschen Ranch Rezoning
134)	5/11/2021	email	Mr/Mrs Goodman	Radec Ct	Questions & Opposes Fitschen Ranch Rezoning
135)	5/12/2021	email	Roger Chang	Dodson Way	Opposes Tropical Nursery Rezoning & Supports Gravel Pit & Town Center
136)	5/21/2021	email	Bryce Lagsdin	Not identified	Opposed to low income housing in VP

**HCD 6<sup>th</sup> Housing Element Comments and Responses**  
**City of Villa Park**  
**June 2021**

HCD Comment (Letter of 2/19/2021)	Housing Element Page No.	Response/Revision
A. Review and Revise	Appendix A p. A-3	Appendix A has been revised to provide additional information regarding the effectiveness of programs in addressing special needs, and notes that 2 residential care facilities have been established in the city.
B.1 Affirmatively Furthering Fair Housing	IV-36	The sites analysis has been expanded to include a discussion of affirmatively furthering fair housing.
	IV-57/58	Program 6 has been revised to describe actions the City will take to affirmatively further fair housing.
B.2 Inventory of Sites to Accommodate the RHNA	IV-33 to 39	<p><u>RHNA</u>. SCAG adopted the final RHNA Plan on March 4, 2021. The element has been updated to reflect the final RHNA (p. IV-33).</p> <p><u>Realistic Capacity</u>. Please note that the sites located in Town Center (Fig. IV-34) are zoned to allow residential use or mixed use at a density of 20-24 units/acre, in addition to commercial. The analysis has been expanded to address this comment (p. IV-34).</p> <p><u>Suitability of Non-vacant Sites</u>. As noted in Fig. IV-34 (p. IV-37) the sites inventory has been expanded and non-vacant sites comprise only 17% of the lower-income sites inventory (28 of 165 potential lower-income units).</p> <p><u>ADUs</u>. The City's assumptions for future ADU production have been revised as shown in Fig. IV-34. The income distribution for ADUs is consistent with SCAG's 2020 analysis of ADU affordability, as discussed on p. IV-35.</p> <p><u>City-owned sites</u>. Program 3 (p. IV-56) has been revised to address this issue.</p> <p><u>Infrastructure</u>. The element includes analysis of water supply (p. IV-51) and has been expanded to state that water supply is expected to be sufficient to accommodate the City's RHNA allocation during the planning period.</p> <p><u>Affirmatively Furthering Fair Housing</u>. The element has been expanded to clarify that potential sites for additional housing development are distributed throughout the community (IV-36).</p> <p><u>Sites map</u>. Map showing the locations of potential sites have been provided (p. IV-38).</p> <p><u>Electronic sites inventory</u>. An electronic sites inventory will be submitted with the adopted Housing Element.</p> <p><u>Zoning for a variety of housing types</u>. The analysis of constraints (p. IV-45) and</p>

HCD Comment (Letter of 2/19/2021)	Housing Element Page No.	Response/Revision
		Program 4 (p. IV-56) have been revised to address employee housing and emergency shelters.
B.3 Governmental Constraints	IV-41 to 53	<p><u>Land use controls</u></p> <ul style="list-style-type: none"> <li>• <u>Lot coverage limits.</u> The element has been expanded to include lot coverage standards (Figure IV-36 on p. IV-42)</li> <li>• <u>Height limits.</u> The element has been revised to note that 3-story development is permitted in the CP zone through the Alternative Development Standard process (p. IV-43)</li> <li>• <u>Large lots.</u> The element has been expanded to include additional analysis of existing large lot patterns (p. IV-42).</li> </ul> <p><u>Housing for persons with disabilities</u></p> <ul style="list-style-type: none"> <li>• <u>Large residential care facilities.</u> The element has been revised to include a commitment to process a zoning amendment to allow large residential care facilities (p. IV-47 and Program 4 on p. IV-56).</li> </ul> <p><u>Processing and permit procedures</u></p> <ul style="list-style-type: none"> <li>• <u>Required findings for approval.</u> The element has been revised to describe the required findings for site plan review approval (p. IV-49).</li> </ul> <p><u>Building codes and enforcement</u></p> <ul style="list-style-type: none"> <li>• <u>Code enforcement.</u> The element has been revised to describe how the City enforces planning and building codes (p. IV-47).</li> </ul> <p><u>On- and off-site improvements</u></p> <ul style="list-style-type: none"> <li>• <u>Subdivision improvement requirements.</u> The element has been revised to describe improvement requirements such as street widths (p. IV-48).</li> </ul>
B.4 Non-Governmental Constraints	IV-49	<p><u>Densities and approval times.</u> The element has been expanded to analyze requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for housing development and submittal of application for building permits.</p>
C. Housing Programs	IV-55 to 59	<p><u>Program 2-Accessory Dwelling Units.</u> The City's estimate of potential ADU production to accommodate the RHNA has been reduced as discussed on p. IV-35).</p> <p><u>City-owned sites.</u> Program 3 (p. IV-56) describes actions the City will take to encourage development of City-owned property.</p> <p><u>Program 3-Housing Development for All Economic Segments.</u> This program has been revised to include a commitment to contact developers of</p>

HCD Comment (Letter of 2/19/2021)	Housing Element Page No.	Response/Revision
		<p>affordable housing annually and incorporate housing opportunities for persons with special needs. (p. IV-56)</p> <p><u>Governmental and non-governmental constraints</u>. This comment is addressed under items B.3 and B.4 above.</p> <p><u>Program 5-Housing Conditions</u>. This program has been revised to include a commitment to monitor housing conditions and take additional actions as appropriate. (p. IV-57)</p> <p><u>Program 6-Affirmatively Furthering Fair Housing</u>. This program has been expanded to include additional actions to affirmatively further fair housing. (p. IV-57/58)</p>
C. Quantified Objectives	IV-59	The draft element included quantified objectives for new construction and rehabilitation by income category. With regard to conservation/preservation, there are no deed-restricted affordable units in Villa Park; therefore, no objectives have been established.
C. General Plan Consistency	IV-58	New Program 8 has been added to address this comment. As part of the 2021 Housing Element update process and each subsequent annual progress evaluation, the City will review the other elements of the General Plan and if any inconsistencies are identified, appropriate actions will be taken to ensure that General Plan consistency is maintained.