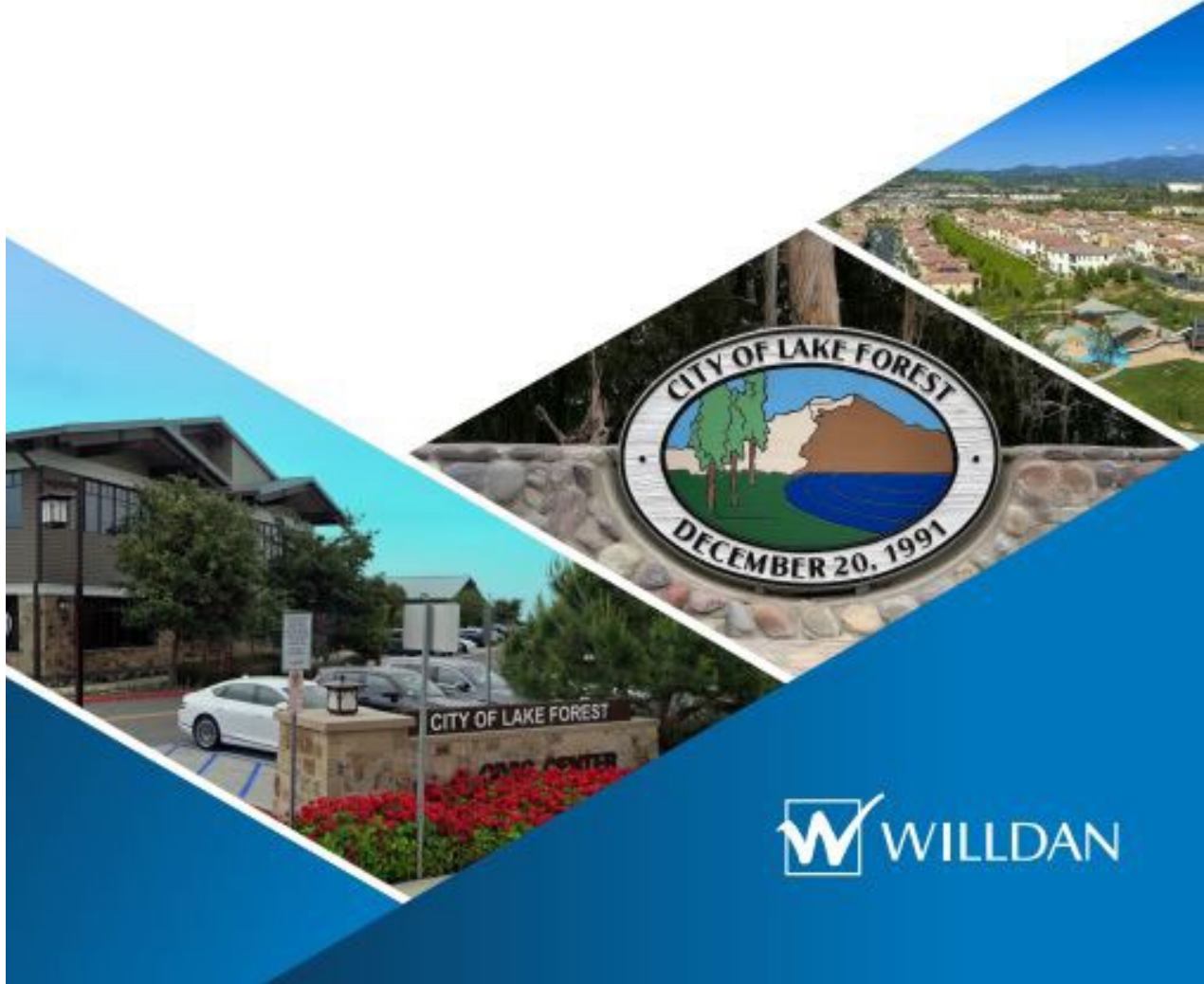


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# CITY OF LAKE FOREST CALIFORNIA

## 5-Year Consolidated Plan FY 2025-2030 and Annual Action Plan FY 2025-2026

March 2025



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# **Executive Summary**

## **ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

### **1. Introduction**

The Consolidated Plan is a five-year planning document required by the U.S. Department of Housing and Urban Development (HUD) to be submitted by all participating jurisdictions that receive HUD formula entitlement grant funds. The City of Lake Forest receives Community Development Block Grant (CDBG) entitlement funds annually. This Plan is designed to help participating jurisdictions analyze their housing, community, and economic development needs, so that they can effectively utilize the grant funds allocated each year by HUD. CDBG was created through the Housing and Community Development Act of 1974 to develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities, principally for persons of low- and moderate-income. CDBG regulations require that at least 70 percent of all CDBG funds are used to benefit low- and moderate-income residents who are members of households that earn less than 80 percent of Area Median Income (AMI).

As an entitlement jurisdiction, the City must submit the Five-Year Consolidated Plan, as required by HUD, by the due date of “no less than 45 days prior to the start of the grantee's program year start date”. As Lake Forest's fiscal year begins July 1st, this means the Consolidated Plan and each subsequent Annual Action Plan is due to HUD on or around May 15th each year.

The current planning process covering FY 2025-2030 also includes the development of the FY 2025-2026 Action Plan, which is the City's annual CDBG expenditure plan. The Action Plan details the activities the City will undertake to address housing and community development needs and local objectives using CDBG funds. The City anticipates receiving \$479,750 in CDBG funding for Fiscal Year 2025-2026, and roughly the same amount minus a five percent annual decrease over the next five years. Program income is also generated by the repayment of prior funded housing rehabilitation loans which will also be available to undertake eligible housing activities. It is estimated that approximately \$300,000 annually of program income from the City's revolving loan program will be available to support the Housing Rehabilitation Programs.

### **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The Consolidated Plan contains a Needs Assessment and Market Analysis that provide insight into the different levels of need within the community and the market in which grant-funded programs will be implemented. The Needs Assessment incorporates national data from the American Community Survey (ACS) 5-Year Estimates and Comprehensive Housing Affordability Strategy (CHAS) data, in addition to specific local data. Based on this data and input from citizen participation, the Strategic Plan identifies the

City's priority needs, including the rationale for establishing allocation priorities and specific measurable goals to be addressed during the five-year period. Regulations governing the CDBG program require that each activity undertaken with CDBG funds meet one of the following three broad national objectives: 1) Benefit people with low- and moderate-income; 2) Aid in the prevention or elimination of slums and blight; 3) Meet an urgent need (such as earthquake, flood, or hurricane relief). Additionally, activities funded must also meet one of HUD's eligible use categories.

According to HUD's Consolidated Plan Final Rule, the overall goal of community planning and development programs is to develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for low- and moderate-income persons as follows:

- **Decent Housing (DH):** includes assisting homeless persons to obtain appropriate housing and assisting persons at risk of becoming homeless; retention of the affordable housing stock; and increasing the availability of permanent housing in standard condition and affordable cost to low-income and moderate-income families, particularly to members of disadvantaged minorities, without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability. Decent housing also includes increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs, including persons with HIV/AIDS and their families, to live with dignity and independence; and providing housing affordable to low-income persons accessible to job opportunities.
- **A Suitable Living Environment (SL):** includes improving the safety and livability of neighborhoods; increasing access to quality public and private facilities and services; reducing the isolation of income groups within a community or geographical area through the spatial de-concentration of housing opportunities for persons of lower-income and the revitalization of deteriorating or deteriorated neighborhoods; restoring and preserving properties of special historic, architectural, or aesthetic value; and conservation of energy resources.
- **Expanded Economic Opportunities (EO):** includes job creation and retention; establishment, stabilization and expansion of small businesses (including micro-businesses); the provision of public services concerned with employment; the provision of jobs involved in carrying out activities under programs covered by this plan to low-income persons living in areas affected by those programs and activities; availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices; access to capital and credit for development activities that promote the long-term economic and social viability of the community; and empowerment and self-sufficiency opportunities for low-income persons to reduce generational poverty in federally assisted and public housing.

## Outcomes and Priority Needs Established

In addition to meeting one of the General Objective Categories above, HUD requires that project activities funded with entitlement funds also meet one of the following General Outcome Categories: Availability/Accessibility (1), Affordability (2), or Sustainability (3). Each activity funded will thus have a

combination of the Objective and Outcome Category listed in the description (i.e. DH-2 would be Decent Housing that is Affordable), which allows for measuring of accomplishments for each of the Consolidated Plan's five years.

During the development of the FY 2025-2030 Consolidated Plan, the following priorities were established as a High Priority Need, with the required Objective and Outcome Category listed in parenthesis and the programs to be funded/implemented are noted by bullet point:

- **Priority 1- Affordable Housing (DH-2) [High Need]:** Promote, preserve, and assist in the development of affordable housing for low- and moderate- income residents, special needs groups, those at-risk of homelessness, and disproportionately impacted residents.
- **Priority 2: Community Facilities and Infrastructure (SL-1) [High Need]:** Improve and expand facilities and infrastructure that serve low- and moderate- income neighborhoods and residents.
- **Priority 3: Public Services (SL-1) [High Need]:** Provide and improve access to public services for low- and moderate-income persons and those with special needs, as well as prevent and eliminate homelessness.
- **Priority 4: Community Preservation Services (SL-3) [High Need]:** Provide for the preservation of low- and moderate-income neighborhoods in the target areas.
- **Priority 5: Economic Development (EO-1) [Moderate Need]:** Provide for the economic development needs of low- and moderate-income persons and neighborhood target areas.
- **Priority 6- Administration and Planning (SL-1) [High Need]:** Provide for administration and planning activities to develop housing and community development strategies and programs needed to carry out actions that address identified needs in the Consolidated Plan in accordance with HUD regulations and provide Fair Housing services for all residents.

### 3. Evaluation of past performance

The City's CDBG funded programs undertaken over the last two Consolidated Plan Cycles have aided in solving neighborhood and community problems by providing a funding source for underserved needs. Specifically, Infrastructure Improvement Projects have given low-and moderate-income residential neighborhoods an improved street infrastructure system through ADA curb cuts and ramps and the installation of Audible Pedestrian Signal Push Button lights; public services have helped the City's elderly, youth, homeless, at-risk, victims of domestic violence, and other special needs groups; residents have benefitted from Fair Housing and Tenant/Landlord Counseling Services; residents have been provided affordable housing through an affordable housing acquisition program; the housing stock has been sustained through rehabilitation of deteriorated housing units/lead-based paint testing and abatement; supportive services have been provided to homeless persons/families and/or those at risk of becoming homeless; and the Senior Center was improved with a special allocation of Covid-19 funding.

All of these projects and experiences therein have helped guide the City in choosing the goals and projects for the new Consolidated Plan Cycle. As such, the City will be continuing the priorities and projects from the last plan, as there is still an unmet need due to the limited amount of grant funds received each year.

It is anticipated that funding received in the next five years will not be sufficient to complete the entire remaining infrastructure projects needed within the low- and moderate-income areas identified in the City's Capital Improvement Plan (CIP). Moreover, affordable housing, public services, fair housing and administration are still High priority needs in the community and will therefore receive continued funding. As Economic Development is a Medium level priority that has somewhat more restrictive regulations attached to it, it will be included in the Consolidated Plan, but may not be funded with CDBG funds during this cycle. Instead, the City will seek to fund that activity with leveraged resources and will evaluate funding with CDBG should funds become available.

#### **4. Summary of citizen participation process and consultation process**

City staff encouraged residents and local and regional organizations to participate in the preparation of the FY 2025-2030 Consolidated Plan. There were several opportunities for City residents and agencies/organizations to offer input into the Consolidated Plan process, as noted below:

- The City posted an online Community Needs Survey to solicit the opinion of residents and business owners regarding the City's most pressing needs. The survey was available in English and Spanish.
- On January 9, 2025, the City participated in the Orange County 2025-2029 Analysis of Impediments to Fair Housing Workshop, to gather public input on fair housing issues faced by residents, which are incorporated into the Consolidated Plan.
- A draft of the Consolidated Plan was made available for a 30-day public comment period from March 20, 2025 to April 24, 2025.
- The City Council discussed the draft Consolidated and Expenditure Plan at its April 15, 2025 meeting to review funding recommendations and applications received.
- The Consolidated Plan is scheduled to be adopted by the City Council on May 6, 2025.

A Community Development Needs Survey was made available online through the City's website from November 1, 2024, through February 28, 2025. There was a total of 238 participants. The survey was available in English and Spanish and responses were mostly received from zip code 92630 (70 percent); 58 percent of the responses were from seniors over 55, which may slightly skew the results. The priority needs and programs established in order of greatest need were as follows:

- **Housing Supply/Improvements:** Housing for Seniors (Age 62 and older) received the most responses for critical need at 29%, followed by Homebuyer Assistance and Acquisition (for Affordable Housing) at 26% each, and Housing for Small Families at 21%.
- **Social and Public Service:** Mental Health services received the highest number of critical need responses at 33% followed by Healthcare Services at 30% and Childcare Services/Services for Abused and Neglected Children at 28% each.
- **Public Infrastructure:** Flood Prevention/Drainage, Street Lighting, Water System Improvements, and Residential Street Improvements received the highest number of critical need responses at 34%, 31%, 29%, and 27% respectively.

- **Homeless Services:** Mental and Behavioral Health received the most responses at 37% followed by Permanent Housing at 31%, Substance Abuse Programs at 28%, and Homeless Prevention (One-Time Rent/Utilities Assistance) at 27%.
- **Community Facilities:** Parks and Recreational Facilities received the most critical need responses at 31% followed by Neighborhood Community Centers at 27%, Health Facilities at 23%, and Youth Centers at 19%.

## 5. Summary of public comments

A summary of public comments received during the planning process can be found in the Citizen Participation section of this Consolidated Plan, as well as in the appendix.

## 6. Summary of comments or views not accepted and the reasons for not accepting them

All comments and input received by the City in the development of the Five-Year Consolidated Plan and Annual Action Plan were accepted and taken into consideration in the development of the Consolidated Plan and Annual Action Plan. There were no comments not accepted.

## 7. Summary

The primary objective of the CDBG program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. Additionally, each activity to be funded with CDBG funds must meet a national objective.

The FY 2025-2030 Five-Year Consolidated Plan will cover five years beginning in FY 2025-2026 and ending in FY 2029-2030. As required by HUD, the Consolidated Plan is prepared using HUD's electronic template. The template includes over 50 community profile and housing market data tables prepopulated with data from HUD.

The FY 2025-2026 Annual Action Plan is the first of five annual plans in the FY 2025-2030 Consolidated Plan cycle. The Annual Action Plan is the City's one-year expenditure plan for CDBG funds. The Action Plan identifies the activities the City will undertake during a twelve-month period with CDBG funds to address community needs that support the broad objectives and goals identified in the Consolidated Plan.

To date, HUD has not announced 2025 grant allocations; however, for planning purposes, the City anticipates receiving \$479,750 in CDBG funds for FY 2025-2026 (represents a 5% reduction from the prior year allocation). Program income generated by the repayment of prior funded housing rehabilitation loans and prior year uncommitted funds will also be available to undertake eligible housing activities, which is estimated at \$180,764.44 (carryover) and \$121,422 (2024 Revolving Loan Income). Based on the City's estimated FY 2025-2026 CDBG allocation, the following activities are proposed:

Program Name	Program Description	Proposed CDBG Funding
Public Facility Improvements/Housing	Examples: Assisted Pedestrian Signal Pushbuttons and housing rehabilitation loans and grants	\$311,838 (entitlement) \$180,764.44 (carryover) \$121,422 (2024 Revolving Loan Income)
Public Services	Examples: Food distribution, health care services, senior services, and homeless services	\$71,962
CDBG Program Administration	Program coordination, management, staffing, monitoring, and reporting; fair housing education and enforcement services	\$95,950

#### **FY 2025-2026 Budget Allocation**

Due to the delay in approving the federal 2025 budget, the City will increase or decrease proposed CDBG funding for activities by a percentage based on the final 2025 CDBG grant. Further details can be found in section AP-15 Projects.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	LAKE FOREST	City Manager's Office

**Table 1 – Responsible Agencies**

### Narrative

As shown in Table 1, the City Manager's Office is primarily responsible for the preparation of the Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Review reports required by HUD, as well as the overall administration of CDBG funds.

### Consolidated Plan Public Contact Information

The main point of contact for the CDBG Program is:

Adrian Grijalva  
Economic Development/Housing Manager  
City Manager's Office  
agrijalva@lakeforestca.gov  
(949) 282-5213

## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)**

### **1. Introduction**

The consolidated planning process requires jurisdictions to contact and consult with other public and private agencies when developing the Consolidated Plan. The plan must include a summary of the consultation process, including identification of the agencies that participated in the process. Jurisdictions also are required to summarize their efforts to enhance coordination between public and private agencies.

The City sought the input of residents, city departments, non-profit organizations, program beneficiaries and service providers required to create strategic development plans for the city's needs for the 2025-2030 Consolidated Plan period. A list of these agencies can be found in Table 2.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

To enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies, the City of Lake Forest took the following actions:

- The City Manager's Office, acting as the lead agency, met with various City departments and consulted with outside agencies to gain input on annual needs, enhance coordination of services, prevent duplication of services, and resolve issues within the interagency institutional structure.
- The City of Lake Forest collaborates with the County to obtain input on assisted-housing programs. Specifically, the City works with and supports the Orange County Housing Authority's (OCHA) administration of the Housing Choice Voucher Program, which provides housing subsidies to qualified lower-income renters. Coordination is enhanced by the City's participation as a member of the OCHA Advisory Committee.
- To strengthen the housing delivery system in the private sector, the City encourages private housing developers to include affordable units in multi-family housing developments within Lake Forest. The City will also continue to cooperate with local nonprofit housing organizations to identify and provide housing opportunities for lower-income households.
- Orange County has a broad spectrum of public and nonprofit social service providers that address the needs of the region's residents. Through the annual CDBG public service grant funding process, City staff can ascertain the type of services City residents require (e.g., senior services, youth services, services for the near homeless and those already homeless), and develop partnerships with local agencies to ensure the delivery of quality services.
- The City of Lake Forest has an active economic development program that coordinates business activities and employment programs with community organizations such as the Lake Forest Chamber of Commerce and Orange County Workforce Solutions.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

Coordination of Orange County's Continuum of Care (OC-CoC) planning process is led by 2-1-1 Orange County and the OC Community Services Department. This nonprofit-public partnership helps ensure comprehensive, regional coordination of efforts and resources to reduce the number of homeless and persons at risk of homelessness throughout Orange County. This partnership serves as the regional coordinator of the year-round CoC planning process and as a catalyst for the involvement of the public and private agencies that make-up the regional homeless system of care.

The City participants in the CoC planning process by providing information regarding the activities it will fund to address local homeless issues. This information is used by the OC-CoC to prepare the regional application to HUD for Homeless Assistance Grant funds. City staff will also expedite certifications of consistency with the Consolidated Plan and other forms of support for the OC-CoC. The City is also a supporter and participant in the biennial Point-In-Time Survey of the region's homeless.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The City is not a recipient of Emergency Solutions Grant (ESG) funds; therefore, it does not assist the OC-CoC with the determination of ESG allocations nor evaluating the outcomes, or developing policies and procedures for the administration of the regional Homeless Management Information System (HMIS).

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	<b>Orange County Housing Authority</b>
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided data regarding households receiving HUD rental assistance and regarding households on the waitlist for housing assistance
2	<b>Agency/Group/Organization</b>	<b>211 Orange County</b>
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homeless Management Information System (HMIS)
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided data regarding regional homeless, housing/service gaps for homeless, and HMIS management
3	<b>Agency/Group/Organization</b>	<b>Fair Housing Council of Orange County</b>
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Impediments to Fair Housing
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided data regarding fair housing issues in the community and input on impediments to fair housing, and assisted in developing action steps to address impediments to fair housing
4	<b>Agency/Group/Organization</b>	<b>Age Well Senior Services</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the housing and service needs of seniors, including home-bound seniors
5	<b>Agency/Group/Organization</b>	<b>Families Forward</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Families with children Anti-poverty Strategy Needs of Low/Mod persons
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the housing and service needs of homeless families and families at risk of becoming homeless
6	<b>Agency/Group/Organization</b>	<b>Family Assistance Ministry</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Anti-poverty Strategy Needs of Low/Mod persons
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the housing and service needs of homeless households and households at risk of becoming homeless
7	<b>Agency/Group/Organization</b>	<b>South County Outreach</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Needs of Low/Mod persons
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the needs of lower income households specifically, individuals/households at risk of becoming homeless
8	<b>Agency/Group/Organization</b>	<b>Vocational Visions</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities

	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the needs of adults with developmental disabilities, including developing economic opportunities for this special needs population
9	<b>Agency/Group/Organization</b>	<b>Camino Health Center</b>
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Needs of Low/Mod persons
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the medical/dental service needs of the community including homeless individuals
10	<b>Agency/Group/Organization</b>	<b>Mercy House Transitional Living Centers</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the needs of chronically homeless individuals
11	<b>Agency/Group/Organization</b>	<b>Council On Aging - Orange County</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided information regarding the housing and service needs of elderly and disabled individuals residing in managed care facilities
12	<b>Agency/Group/Organization</b>	<b>County of Orange</b>
	<b>Agency/Group/Organization Type</b>	Other government - County

	<b>What section of the Plan was addressed by Consultation?</b>	Regional program information
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Various county departments provided information regarding public health, public safety, and housing programs
13	<b>Agency/Group/Organization</b>	<b>State of California</b>
	<b>Agency/Group/Organization Type</b>	Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	State program information
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Various state departments provided information regarding demographics, public safety, and economics
14	<b>Agency/Group/Organization</b>	<b>Laura's House</b>
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consulted with this agency to obtain data on the number of domestic violence victims as well as their special needs.

### **Identify any Agency Types not consulted and provide rationale for not consulting**

The City consulted with a variety of agencies serving Lake Forest residents and the region. No agency types were explicitly excluded from the consultation process.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Orange County 211	Provides regional and local point in time homeless survey data, development of the regional 10-Year Plan to End Homelessness and development of the regional Discharge Plan
5 Yr. & 1 Yr. PHA Plan	Orange County Housing Authority	Identifies OCHA resources to address the housing needs of lower income renter householders in the County and the City
City of Lake Forest 2021-2029 Housing Element	City of Lake Forest	Provides City housing priorities and program goals
Analysis of Impediments to Fair Housing	Orange County HUD Grantee Cities and the County of Orange	Countywide document that identifies fair housing impediments within participating cities and outlines a plan to address issues

**Table 3 – Other local / regional / federal planning efforts****Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

Data from the California Department of Public Health and the Orange County Health Care Agency identifies the percentage of young children with elevated lead blood levels. The City used this data to assess lead-based paint hazards. State agencies were also consulted to obtain updated housing and population information. The County of Orange was contacted to obtain an array of data, including information regarding the number of households receiving rental assistance, homeless count, and other regional data. Local governments also assisted the City with the preparation of the Consolidated Plan. The Orange County Health Care Agency was consulted regarding the number of Lake Forest residents living with HIV and AIDS and available HOPWA program resources. The City also participated in roundtable meetings with other Orange County CDBG recipients to discuss the preparation of a regional analysis of impediments to fair housing and other regional housing and community needs.

**Narrative (optional):**

N/A See narratives above.

**PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

The City of Lake Forest offered several opportunities for participation and comment throughout the Consolidated Plan preparation process. The City’s Citizen Participation Plan, which is presented in Appendix C, outlines the City’s process to obtain public participation in the development of the Consolidated Plan, Annual Action Plan (AAP), and other facets of the CDBG Program. Action steps include a public hearing before the City Council, which also initiated the 30-day public review of the Consolidated Plan, with the final City Council adoption at a public meeting originally scheduled for May 6, 2025. The notice for the City Council public hearing and a summary of public comments is provided in Appendix D. Public comment and review requirements for adoption of the FY 2025-2030 Orange County Analysis of Impediments to Fair Housing were also undertaken in conjunction with the Consolidated Plan.

The comments received through the citizen participation process are essential to identifying priority needs, as are the results of the Community Needs survey.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	The City published a Notice of Funding Availability (NofA) in the Newspaper on December 5, 2024.	11 Applications for funding were received and the Proof of Publication can be found in Appendix F.	N/A There were no comments received that were not accepted.	N/A

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Community Needs Survey	Non-targeted/broad community	The FY 2025-2030 Consolidated Plan Community Survey was available from November 2024 to February 2025. The City posted a Community Needs Survey on its website and distributed hard copies to the senior center and at various events from November 2024 through January 31, 2025. 228 responses were received.	Survey results received are included in Appendix E.	N/A There were no comments received that were not accepted.	N/A
3	Public Meeting	Non-targeted/broad community  Social Service Providers	The City Council received a presentation on the draft Consolidated Plan and Expenditure Plan on April 15, 2025 to review funding recommendations and applications received.	Meeting comments centered on the CDBG public service grant application process.	N/A There were no comments received that were not accepted.	N/A

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-English Speaking - Specify other language: Spanish  Non-targeted/broad community	The City participated in the South County Regional AI public input meeting on 1/9/25.	A summary of the comments received can be found in Appendix G	N/A There were no comments received that were not accepted.	N/A
5	Newspaper Ad	Non-targeted/broad community	Notice regarding the 30-day public review period and May 6, 2025, Public Hearing was published on 3/20/25.	A summary of comments received can be found in Appendix C and Proof of Publication in Appendix F.	N/A There were no comments received that were not accepted.	N/A
6	Public Hearing	Non-targeted/broad community	The City Council held a public hearing on 5/06/25 to accept final public comments on the Consolidated Plan, AAP, and OC-AI, and authorize submission of the document to HUD.	A summary of comments received can be found in Appendix C.	N/A There were no comments received that were not accepted.	N/A

**Table 4 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The Needs Assessment of the Consolidated Plan identifies the City's needs as they relate to housing, homelessness, community development, and special needs populations. The housing needs assessment section evaluates household income, tenure (renter or owner), housing cost as a function of household income, disproportionate needs amongst racial and ethnic groups, and public housing needs. The homeless needs assessment examines the sheltered and unsheltered homeless population in San Bernardino County to inform the City's strategy to address homelessness during the next five years. The non-homeless special needs assessment section evaluates the needs of people who are not homeless, but due to various reasons are in need of services including but not limited to: elderly, frail elderly, severely mentally ill, developmentally disabled, physically disabled, persons with alcohol or other drug addictions, persons with HIV/AIDS and victims of domestic violence. The non-housing community development needs assessment section discusses the need for public facilities, public infrastructure improvements, and public services to benefit low- and moderate-income residents.

From this Needs Assessment, the City will identify those needs with the highest priority, which will form the basis for the Strategic Plan and the programs and projects to be administered during the five-year Consolidated Plan for FY 2025-2030. Information contained in the assessment is gathered through data analysis, consultations, and citizen participation. To assess community needs, the City examined data, held community meetings, conducted a Community Needs Survey, and consulted with local stakeholders. The Needs Assessment primarily relies on the following sources of data:

- American Community Survey (ACS)(2016-2020 current year estimates)
- Comprehensive Housing Affordability Strategy (CHAS data 2016-2020)
- 2024 Point- in- Time Homeless Count
- The California Association of Realtors (CAR) website was accessed to obtain information on current market trends and affordability
- The Housing Element and Development Codes were reviewed to provide insight on zoning and land use policies and units at risk of conversion
- Previous Consolidated Plans and other Community Strategic Plans were used to provide supporting data on demographics, City programs, needs, and strategies
- Various data requests were sent to County level staff from the Department of Health Services and Housing Authority

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

The following section describes the estimated housing needs projected for the next five-year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost burden, severe cost-burden, substandard housing, and overcrowding (especially large families).

To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, an assessment of that specific need is completed. Disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

During the past decade, Lake Forest has experienced moderate population growth. According to data presented in Table 5, the City's population grew by 6% between 2009 and 2020. In comparison, during roughly the same period, the County's population grew 2.7, while California's population grew 6.7%. The 2016-2020 American Community Survey 5-Year Estimates also indicates there was an 8% growth in households and a 24% increase in the median income.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	79,925	84,665	6%
Households	27,045	29,340	8%
Median Income	\$91,254.00	\$112,988.00	24%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

## Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	3,290	3,075	5,090	3,210	14,680
Small Family Households	1,170	1,315	1,785	1,730	9,180
Large Family Households	195	270	510	305	1,310
Household contains at least one person 62-74 years of age	985	720	1,180	745	3,280
Household contains at least one person age 75 or older	710	540	750	185	750
Households with one or more children 6 years old or younger	355	464	709	550	1,740

**Table 6 - Total Households Table**

Data 2016-2020 CHAS  
Source:

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	35	50	50	10	145	0	10	20	0	30
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	90	95	105	150	440	0	0	20	15	35

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	90	110	165	95	460	70	0	185	115	370
Housing cost burden greater than 50% of income (and none of the above problems)	910	705	330	35	1,980	1,345	485	190	65	2,085
Housing cost burden greater than 30% of income (and none of the above problems)	0	460	1,020	380	1,860	105	520	1,225	590	2,440
Zero/negative Income (and none of the above problems)	55	0	0	0	55	120	0	0	0	120

**Table 7 – Housing Problems Table**

Data 2016-2020 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,130	950	655	290	3,025	1,410	495	420	190	2,515
Having none of four housing problems	295	510	1,410	990	3,205	450	1,115	2,610	1,735	5,910
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

**Table 8 – Housing Problems 2**

Data 2016-2020 CHAS  
Source:

### 3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	510	865	425	1,800	445	335	550	1,330
Large Related	140	130	64	334	55	90	94	239
Elderly	135	170	160	465	759	500	460	1,719
Other	335	189	815	1,339	190	95	380	665
Total need by income	1,120	1,354	1,464	3,938	1,449	1,020	1,484	3,953

**Table 9 – Cost Burden > 30%**

Data 2016-2020 CHAS  
Source:

#### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	530	530	425	165	0	590
Large Related	0	0	60	60	55	90	4	149
Elderly	135	130	45	310	685	150	110	945
Other	0	335	94	429	180	0	0	180
Total need by income	135	465	729	1,329	1,345	405	114	1,864

**Table 10 – Cost Burden > 50%**

Data 2016-2020 CHAS  
Source:

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	175	125	200	205	705	70	0	195	115	380
Multiple, unrelated family households	10	80	45	20	155	0	0	10	15	25
Other, non-family households	0	0	35	20	55	0	0	0	0	0
Total need by income	185	205	280	245	915	70	0	205	130	405

**Table 11 – Crowding Information – 1/2**

Data 2016-2020 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

**Table 12 – Crowding Information – 2/2**

Data Source  
Comments:

### **Describe the number and type of single-person households in need of housing assistance.**

Data provided by HUD’s Consolidated Plan template for Table 12 above does not provide information for single person households in need of housing assistance. However, the City's Housing Element reported that 21.8% of family households are headed by a single male or single female. There are 1,226 male heads of household with no spouse present and 413 of these households have children under 18. There is a larger number of female householders with no spouse present – 3,378 households or 11.8% of family households – and 1,702 of these female-headed households have children under 18.

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

### **Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

Disabled Households: According to the 2016-2020 ACS data, there are an estimated 5,838 Lake Forest residents with a disability – approximately 7.2% of the City’s population. Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities ..." Of residents with a disability, 559 (9.6%) are living below the poverty level.

The City’s elderly population has significant levels of disabilities. The ASC estimates 26.3% of Lake Forest seniors, age 65 and over, have a disability. Since seniors have a much higher probability of being disabled, the housing and service needs for persons with disabilities should grow commensurate with senior population growth. Accessibility housing needs of the disabled population, including the elderly, can typically be addressed through housing rehabilitation programs that provided improvements such as ramps, grab bars, wider doorways, and specialized kitchen cabinets.

Victims of Domestic Violence: The National Coalition Against Domestic Violence (NCADV) estimates that nationwide, domestic violence hotlines receive 20,000 calls per day. NCADV also reports that one in three women have experienced rape, physical violence, or stalking by an intimate partner in their lifetime. The

State of California Department of Justice reports that in 2023, there were 36 calls for assistance related to domestic violence in Lake Forest; however, prior year data from 2014-2023 shows an average of 235 calls per year.

Laura's House, a leading domestic violence service provider in South Orange County, estimates that only one in seven incidents are reported. Laura's House also estimates that for each victim of domestic violence that receives shelter and support services, 15 to 20 individuals are turned away from lack of space. The Orange County 2024 Point In Time Survey of the region's homeless estimates that 10.01% of unsheltered homeless in South Orange County are victims of domestic violence, and 10.40% of sheltered homeless in South Orange County are victims of domestic violence. Victims of domestic violence often face urgent housing needs, requiring safe and confidential shelter to escape abusive situations.

### **What are the most common housing problems?**

According to HUD data from Table 7, the most common housing problems in Lake Forest is housing cost burden. This housing problem impacts both renter and owner households. To a much lesser degree, some households are affected by crowding and substandard housing (as defined by HUD).

### **Are any populations/household types more affected than others by these problems?**

Table 9 provides estimates regarding the number of lower-income households impacted by housing cost burden (30% of income toward housing cost).

- Among renter households, extremely low-income senior and low-income large related households are most impacted (49.0% and 48.5%, respectively).
- Among owner households, small and large related low-income households are most impacted (62.7% and 65.8% respectively).

Table 10 summarizes information regarding households that pay more than 50% of their income for housing. According to this HUD data, a significant percentage of lower-income households are experiencing severe housing cost burden:

- Among renter households, 68.6% of extremely low-income small renter households are dedicating more than 50% of their income for housing.
- Among owner households, extremely low-income senior households and low-income large households are impacted (46.5% and 60.5% respectively).

As indicated above, few Lake Forest households are impacted by crowded housing. According to Table 11, 1,003 households live in "crowded" housing. HUD's data indicates that 833 of these households are renters and 170 are owners. When addressing crowding issues, the City is required to utilize the States more liberal occupancy standard, which allows up to 30 people to live in a 1,200 sq./ft. residence. The City's Code Enforcement program staff reports that approximately 10% of their cases are related to

overcrowding - the most prevalent issue related to crowding in the City is the impact of parking in residential neighborhoods.

According to Table 7, only 165 Lake Forest households are impacted by HUD-defined substandard housing. The City is required to enforce compliance with the California building code, and according to the City's Code Enforcement staff, substandard housing is not a significant issue in the City. Unpermitted room additions and garage conversions represent the most prevalent types of code violations addressed by City staff.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

The National Alliance to End Homelessness states that households at risk of homelessness are often very low-income households on a fixed income (such as retired seniors) or marginally employed. Due to limited income and high area housing costs, at risk households are typically severely housing cost burdened. Based on HUD data, 1,945 extremely low-income Lake Forest households dedicate more than 50% of household income for housing (see Table 10). This data indicates that of this figure, senior and small related households comprise 73.3% of the at-risk population.

OCHA reports that as of April 2025, there are 152 Lake Forest households on the waitlist for federal rental assistance.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

Extremely low-income households that are experiencing severe housing cost burden are most at risk of becoming homeless. The methodology for estimating the number of households that may be at risk of homelessness is also outlined as follows: Based on the CHAS data in Table 7, 4,065 Households in Lake Forest were experiencing severe cost burden, approximately 98 percent (3,965) are considered low- and moderate-income; earning 0-80 percent of Area Median Income (AMI). Moreover, 2,255 Households (910 renter-households and 1,345 owner-households) are extremely low-income (0-30 percent AMI) and are considered at-risk.

## **Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

The origins of involuntary homelessness are multi-faceted but can be grouped into two general categories: physiological and economic factors. Examples of physiological factors include physical or mental illness and addiction disorders. Economic factors include the impact of high housing and medical costs. As indicated previously, Lake Forest households with extremely low-incomes and severe housing cost burden have a high risk of becoming homeless. Housing instability encompasses a number of challenges, such as having trouble paying rent, overcrowding, moving frequently, or spending the bulk of household income on housing. The cost of housing as well as the health effects of substandard housing and forced evictions. Certain populations, such as children who move frequently and people who have spent time in prison, may be more affected by housing instability. Physical or mental illness and addiction disorders, as well as economic factors including the impact of high housing and medical costs impact homelessness. Lack of regular housing, neighborhood characteristics, physical and mental health challenges, elevated rates of childhood and chronic disease, stress, depression, anxiety, and suicide are all characteristics associated with instability and an increased risk of homelessness.

### **Discussion**

According to HUD data provided in the Consolidated Plan template, substandard and crowded housing are not a significant housing problem in Lake Forest; however, housing cost is the most prevalent housing problem. According to the National Alliance to End Homelessness, very low- income households are at a high risk of becoming homeless. Per HUD data, senior and small related households comprise over 70% of the City's extremely low-income residents that are dedicating more than 50% of their income to maintain their home.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

A disproportionate need exists when members of a racial/ethnic group experience housing problems at a rate of 10 percentage points or greater than the proportion of the jurisdiction/income level as a whole. The following section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole for the population of low- and moderate-income households.

The four housing problems are:

1) Lacks complete kitchen facilities; 2) Lacks complete plumbing facilities; 3) More than one person per room; and/or 4) Cost Burden greater than 30%.

The housing problems experienced by race/ethnicity are identified in Tables 13-16 below and analyze disproportionate needs by income level.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,650	635	0
White	1,335	365	0
Black / African American	215	95	0
Asian	325	95	0
American Indian, Alaska Native	50	15	0
Pacific Islander	10	10	0
Hispanic	670	50	0

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,425	650	0
White	1,165	359	0
Black / African American	19	4	0
Asian	415	75	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	805	60	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,330	1,765	0
White	1,895	1,245	0
Black / African American	14	65	0
Asian	450	225	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	845	190	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

## 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,460	1,750	0
White	805	1,150	0
Black / African American	30	70	0
Asian	205	295	0
American Indian, Alaska Native	15	10	0
Pacific Islander	0	0	0
Hispanic	365	180	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

## Discussion

As previously indicated, housing cost burden is the most prevalent housing problem in Lake Forest. Tables 13 through 16 show that regardless of race or ethnicity, a significant number of lower-income Lake Forest households are experiencing a housing problem; however, the data indicates that among extremely low-income households, while 27 percent of the income category for the jurisdiction as a whole are impacted, Black/African American and Pacific Islanders are disproportionately impacted by housing problems at 77 percent and 100 percent respectively.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

A disproportionate need exists when members of a racial/ethnic group experience severe housing problems at a rate of 10 percentage points or greater than the proportion of the jurisdiction/income level as a whole. The following section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole for the population of low- and moderate-income households.

The ACS defines a “selected condition” as owner- or renter occupied housing units having at least one of the following conditions:

1) lacking complete plumbing facilities; 2) lacking complete kitchen facilities; 3) more than 1.5 occupants per room; and 4) selected monthly housing costs greater than 50 percent of household income.

Tables 17-20 below analyze disproportionate needs by race and income level for severe housing problems.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,540	745	0
White	1,300	400	0
Black / African American	215	95	0
Asian	265	150	0
American Indian, Alaska Native	50	15	0
Pacific Islander	10	10	0
Hispanic	660	65	0

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,445	1,625	0
White	585	940	0
Black / African American	4	19	0
Asian	275	210	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	560	300	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,075	4,020	0
White	455	2,685	0
Black / African American	10	69	0
Asian	205	470	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	400	630	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	480	2,725	0
White	145	1,815	0
Black / African American	0	100	0
Asian	55	450	0
American Indian, Alaska Native	15	10	0
Pacific Islander	0	0	0
Hispanic	244	305	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## Discussion

Tables 17 through 20 indicate that regardless of race or ethnicity, a significant number of extremely low-income and very low-income Lake Forest households are experiencing a severe housing problem; however, Black/African American, Asian, and Hispanic households are disproportionately impacted by severe housing problems among the different income categories. In general, at higher income levels, minority populations are not disproportionately impacted by severe housing problems. While 46 percent of the income category for the jurisdiction as a whole are impacted, Black/African American and Pacific Islanders are disproportionately impacted by housing problems at 94 percent and 100 percent respectively.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

HUD defines cost burden as the extent to which gross housing costs, including utility costs, exceeds 30 percent of a given household's gross income. A household is considered severely cost burdened if gross housing costs, including utility costs, exceeds 50 percent of a household's gross income. A disproportionate need exists when members of a racial/ethnic group experience cost burden problems at a rate of 10 percentage points or greater than the proportion of the jurisdiction/income level as a whole. The following section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole for the population of low and moderate-income households.

Table 21 below analyzes disproportionate needs by race and income level for Cost Burden.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	18,905	5,805	4,440	185
White	11,935	3,615	2,265	95
Black / African American	460	50	219	0
Asian	3,190	895	690	75
American Indian, Alaska Native	45	0	50	0
Pacific Islander	10	0	10	0
Hispanic	2,795	1,090	1,130	14

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2016-2020 CHAS

### Discussion:

Table 21 shows that the majority households experiencing overpayment/housing cost burden earn less than 50 percent of the median income, which is similar for all races. As a jurisdiction, households that experience cost burden (pay more than 30 percent or more of their income on housing were identified as follows:

- 18,905 (65 percent) of all households earn extremely low-income. Disproportionate need is not evident in this group.
- 5,805 (20 percent) of all households earn Very- low- income. There is no disproportionate need evident in this group.
- 4,440 (15 percent) of all households earn above 50 percent of the AMI. Disproportionate need exists for Black/African American (30 percent), American Indian/Alaska Native (53 percent), and Pacific Islander (50 percent).

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

**Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

According to Census data, Hispanics/Latinos make up the largest minority population in Lake Forest (24.5% of the City's population). Asians represent the second largest minority population (15.7% of the City's population). Based on HUD data from the above series of tables, Black/African American and Hispanic/Latino households consistently appear to be experiencing housing problems disproportionately to the community as a whole. A notable percentage of Native Americans/ Native Alaskans and Pacific Islanders are also disproportionately impacted by housing problems, but these racial populations comprise a small percentage of the City's population.

**If they have needs not identified above, what are those needs?**

As previously outlined, housing cost is the prevalent housing problem. This housing problem is found among all income categories and most race/ethnic groups. Based on HUD data and City staff input, crowded and substandard housing are not significant issues in Lake Forest.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

In general, minority populations reside throughout the City; however, there are eight Census Tracts in the City with minority populations representing more than the County average of 62.3 percent as follows:

- 320.14 BG 3
- 320.27 BG 3
- 524.11 BG 1 BG 2 BG 3
- 524.22 BG 2 BG 5
- 524.23 BG 2 BG 3
- 524.25 BG 1 BG 3
- 524.28 BG 1 BG 2
- 524.30 BG 1 BG 9

Maps demonstrating these Census Tracts are provided as Figure 1: Low- and Moderate-Income Areas, Figure 2: Ethnic Concentrations, and Figure 3: Transit Access in Section MA-50.

## NA-35 Public Housing – 91.205(b)

### Introduction

There is no public housing in the City of Lake Forest; however, the Orange County Housing Authority (OCHA) administers the Housing Choice Voucher Program in the City of Lake Forest. The Housing Choice Voucher Program provides rental subsidies to low-income families that spend more than 30% of the gross income on housing costs. The Voucher Program pays the difference between the excess of 30% of the recipient's monthly income and the federally approved Fair Market Rent (FMR).

The number of vouchers administered by a housing authority constantly fluctuates due to the availability of new vouchers from HUD and changes in housing costs. According to Tables 22-26, OCHA administers 10,825 rental assistance vouchers throughout most of Orange County, which benefit extremely low and low-income families, elderly, disabled, and homeless households. The majority of households are White and Asian, which is reflective of overall County demographics, though Hispanics may be somewhat underrepresented.

Data received from OCHA as of July 2024 indicated that 161 vouchers were leased in Lake Forest, 36 of which were Family Households, 44 were Disabled Households, and 81 were Senior Households. This number increased to 203 as of April 2025. Per the last Consolidated Plan completed in 2020, 88 households were on the waiting list for rental assistance. OCHA opened their waiting list in September 2023 and received 57,000 applications and the number from Lake Forest increased to 152, which illustrates a huge demand for assistance in the County and City.

The data in tables below represent county-wide statistics.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	10,825	0	10,418	187	207	10

Table 22 - Public Housing by Program Type

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	16,476	0	16,470	17,239	15,594
Average length of stay	0	0	0	8	0	8	0	4
Average Household size	0	0	0	2	0	2	1	3
# Homeless at admission	0	0	0	87	0	5	72	10
# of Elderly Program Participants (>62)	0	0	0	4,926	0	4,884	38	3
# of Disabled Families	0	0	0	2,163	0	2,075	64	14
# of Families requesting accessibility features	0	0	0	10,825	0	10,418	187	207
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

## Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	5,857	0	5,528	139	182	6
Black/African American	0	0	0	745	0	693	39	10	2
Asian	0	0	0	4,128	0	4,107	4	15	2
American Indian/Alaska Native	0	0	0	64	0	60	4	0	0
Pacific Islander	0	0	0	31	0	30	1	0	0
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 24 – Race of Public Housing Residents by Program Type**

Data PIC (PIH Information Center)  
Source:

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	1,941	0	1,814	34	87	4
Not Hispanic	0	0	0	8,884	0	8,604	153	120	6

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

### Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Not applicable. There are no public housing units in Lake Forest.

### Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Not applicable.

### How do these needs compare to the housing needs of the population at large

Not applicable.

### Discussion

There are no public housing units in Lake Forest.

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

Homeless researchers typically use one of two methods to measure homelessness. One way attempts to count all persons that are homeless on a given day/week (point-in-time counts). The second examines the number of people who are homeless over a given period - period prevalence counts. The Orange County Continuum of Care (OC-CoC) uses the first method for its biennial enumeration of the region's homeless. To facilitate the enumeration of the homeless and the allocation of limited resources, the OC-CoC has geographically divided the County into three Service Planning Areas (SPA). Homeless data from the Point-In-Time Survey (PITS) is provided on a county-wide basis, by SPA, and to a lesser degree, by jurisdiction. Because there is limited data regarding Lake Forest's homeless population, it is generally assumed that the characteristics of the City's homeless population are similar to those of the South SPA and Countywide as well. According to the 2024 Point in Time County, there were 7,322 homeless in Orange County as of January 2024; of which there were 641 homeless people in the South Service SPA; 491 unsheltered and 150 sheltered. In Lake Forest, there were 104 homeless identified, all of which were unsheltered.

General demographic information regarding Orange County's unsheltered homeless population include the following:

- 27% were female, 72% male, and 1% were other non-conforming.
- 39% were White, 36% were Hispanic/Latino, 13% were Other Multi, 5% were Black/African American, 4% were Asian, 2% were American Indian/Alaska Native, and 1% were Native Hawaiian/Pacific Islander
- 2% were under the age of 18
- 80 were Veterans
- 146 were Transitional Youth
- 456 were Seniors
- 38% were chronic homeless
- 50% had a substance abuse disorder
- 31% had a physical disability
- 31% had a serious mental illness
- 17% had a developmental disability
- 10% were victims of domestic violence
- 2% were living with HIV/AIDS

## Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 26 - Homeless Needs Assessment**

**Data Source**

**Comments:** 2024 Orange County Point In Time Survey

Indicate if the homeless population is: Has No Rural Homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless**

**individuals and families, families with children, veterans and their families, and unaccompanied youth):**

The OC-CoC conducted a Point-In-Time Survey of Orange County's homeless as part of a national survey. The January 2024 PITS estimated the County's homeless population at 7,322 individuals, with 641 in the South SPA, and 104 homeless in Lake Forest. Orange County's homeless count includes 3,149 sheltered in emergency/transitional housing and 4,173 unsheltered homeless - 150 sheltered and 491 unsheltered in the South SPA. Lake Forest's homeless are enumerated as 0 sheltered and 104 unsheltered.

Characteristics of the City's homeless population is provided to the extent the PITS captured information at the city level. If no specific Lake Forest data is available, an estimate is based on the characteristics of the County's or South SPA's homeless population.

- Chronic Homeless Individuals: HUD defines a chronically homeless individual as an unaccompanied homeless individual (living in an emergency shelter or is unsheltered) with a disabling condition, who has been continuously homeless for a year or more, or has had at least four episodes of homelessness in the past three years. The 2024 PITS estimates there are 37 sheltered and 216 unsheltered chronically homeless in South County SPA – approximately 33.2% of the subregion's homeless population. Based on this percentage, it is estimated there are 37 chronically homeless in Lake Forest. Since the PITS estimates that 85.4% of the chronic homeless in the South SPA are unsheltered, it is further estimated that 32 of these chronically homeless individuals are unsheltered.
- Chronically Homeless Families and Families with Children: The 2024 PITS identifies 53 homeless persons in “families” in Lake Forest - 36 individuals are sheltered, and 17 are unsheltered. The PITS provides no data regarding chronically homeless families; however, among unsheltered homeless individuals, approximately one-third report they become homeless for the first time in the past 12 months.
- Veterans and their Families: The County's 2024 PITS found four veterans among Lake Forest unsheltered homeless.
- Unaccompanied Youth: The 2024 PITS did not estimate “unaccompanied children” (as requested in Table 26); however, the homeless survey estimated the number of youth households, i.e., adults between the ages of 18 and 24 – Transitional Age Youth. The 2024 PITS identified four homeless Transitional Age Youth in the City.
- HIV/AIDS: The 2024 PITS estimated that 0.8% of homeless adults in the South SPA are living with HIV/AIDS. Based on this percentage, it is likely there is one Lake Forest homeless individual is living with HIV/AIDS.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	0	0
Not Hispanic	0	0

Data Source

Comments:

See above

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

OCHA provided the City with information regarding Lake Forest households that submitted applications for rental assistance in 2023, the last time OCHA accepted applications. During the last Consolidated Plan, OCHA reported there were 88 Lake Forest households on the waitlist for housing assistance. Of this number, 31 were households with children, 24 were senior households (age 62 and older), and 36 of applicants indicate they were disabled. Because homeless veterans are provided a priority for rental housing assistance, OCHA staff indicated there are no veteran households on the waitlist; however, OCHA reported 15 veteran households currently receive federal rental assistance. OCHA estimates it will take approximately three years to work through the existing waitlist.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

As previously reported, the 2024 PITS estimates 79.1% of the South SPA's homeless are racially White, 9.5% Black/African American, 8.3% "multi-racial or other," 1.6% Asian, 1.2% Native Hawaiian/Pacific Islander, and 0.5% American Indian/Alaska Native. An estimated 27.3% are Hispanic/Latino. It is reasonable to assume Lake Forest's homeless population mirrors the racial and ethnic composition of the South SPA.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The 2024 Orange County homeless survey reports there are 0 sheltered and 104 unsheltered homeless in Lake Forest.

**Discussion:**

The 2024 Point-In-Time survey of Orange County's homeless estimates there are 104 homeless in Lake Forest – none are sheltered, and all 104 are unsheltered. To a large extent, the characteristics of the homeless in Lake Forest mirrors those of the County's South SPA homeless population, as reported in the 2024 PITS. The 2024 homeless survey also assessed the number of homeless seniors. The survey indicates there are four unsheltered homeless seniors in Lake Forest. According to regional service providers, homelessness among seniors is a growing issue.

Throughout the country homelessness has become an increasing problem. Factors contributing to the rise in homelessness include a lack of housing affordable to low- and moderate-income persons, increases in the number of persons whose income fall below the poverty level, reductions in subsidies to the poor, drug/alcohol abuse, and the deinstitutionalization of the mentally ill. The County suffers from a severe lack of affordable housing for both renters and buyers. The inability of homeless people to afford housing is compounded by the limited employment and entitlement options available to homeless people. With limited working skills, homeless people earn only modest wages. Moreover, cutbacks in federal assistance programs also play a critical part in the plight of the homeless. This has been particularly true with public assistance programs, where benefit levels have not kept pace with the cost of living.

Those who are at-risk of homelessness are those who are experiencing extreme difficulty maintaining housing and have no reasonable alternatives of obtaining subsequent housing. Contributing factors putting people at-risk include eviction, loss of income, low-income, disability, unaffordable increase in the cost of housing, discharge from an institution without subsequent housing in place, irreparable damage or deterioration to residence, and fleeing from family violence.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

HUD requires that the Consolidated Plan include a review of relevant data regarding the housing needs of persons that have special supportive housing needs, but who are not homeless. Certain segments of the population, such as elderly, disabled, victims of domestic violence, and persons with HIV/AIDS may experience conditions that make it difficult for them to access affordable housing. Physical or medical conditions, space or supportive service requirements, income, or other factors may impede a household's ability to obtain decent and affordable housing. This section briefly describes the characteristics of some of the special needs populations in Lake Forest.

### **Describe the characteristics of special needs populations in your community:**

Special need populations are identified as the elderly, disabled, victims of domestic violence, and persons with HIV/AIDS. Characteristics are identified below.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

Elderly/Frail Elderly: According to the U.S. Census Bureau, 12.4% of Lake Forest residents are age 65 and older (2013-2017 ACS). This population is often impacted by limited mobility, increased health complications, and fixed income. Common service needs for the elderly include transportation and in-home services. Per HUD's housing needs data (Tables 9 and 10), 1,749 lower-income elderly households are experiencing housing cost burden – 1,030 are experiencing severe housing cost burden. As of November 2019, OCHA provides housing assistance to 83 senior Lake Forest households - 24 senior Lake Forest households are on OCHA's housing assistance waitlist.

Persons with Disabilities: According to the 2013-2017 ACS, approximately 7.2% of Lake Forest's population has one or more disabilities. Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities..." Examples of disabilities include hearing, mobility, and visual impairments, chronic alcoholism, and mental illness. As of November 2019, OCHA provides housing assistance to 123 disabled Lake Forest households - 36 disabled Lake Forest households are on the housing assistance waitlist. The Regional Center is a nonprofit that coordinates services for individuals with developmental disabilities. They offer services ranging from housing and self-determination programs to job training and placement.

Victims of Domestic Violence: Domestic violence is displayed in many forms; intimidation, physical assault, sexual assault, and other abusive behavior that is part of a pattern of control by a partner against another. Nationwide it is estimated that one in three women and one in seven men experience some form of domestic violence by an intimate partner. The California Department of Justice reports that in 2018, 272 domestic violence calls for assistance were reported in Lake Forest. For these individuals, temporary safe housing is vital. The 2019 PITS estimates that in the South SPA, 11.3% of homeless adults

are victims of domestic violence - 25% are unsheltered. Housing and support options are available for victims of domestic violence.

Persons with HIV/AIDS: Persons with HIV/AIDS are considered a special needs group due to their need for health care and supportive services. Persons with HIV/AIDS may also face bias and misunderstanding about their illness that may affect their access to housing. Furthermore, these households may also have special needs in that they may have trouble balancing their incomes with medical expenses due to their illness, putting them at-risk of becoming homeless.

The Orange County Health Care Agency estimated that as of 2024, there were 113 people living with HIV in in Lake Forest. Demographic data regarding the characteristics of this group include the following:

- Gender: 95 were male, 16 were female
- Race/Ethnicity: 50 were Hispanic, 44 were White, and 11 were Asian
- Age: 40 were age 56 and older and all other age categories had approximately 20 people

Several service providers are available to help special needs populations. Safety net services allow special needs populations to save limited financial resources on items such as transportation, after-school care, and food/clothing. Additionally, fair housing enforcement and rental assistance vouchers are valuable housing resources for special needs populations. The service and housing needs of special needs populations were determined by the input of community stakeholders, government agencies, and service providers.

### **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Persons with HIV/AIDS are considered a special needs group due to their need for health care and supportive services. Persons with HIV/AIDS may also face bias and misunderstanding about their illness that may affect their access to housing. Furthermore, these households may also have special needs in that they may have trouble balancing their incomes with medical expenses due to their illness, putting them at-risk of becoming homeless.

No HIV/AIDS-dedicated housing is located in Lake Forest; however, the AIDS Services Foundation has a motel program that will allow those with HIV/AIDS facing homelessness to stay in motels throughout the region for a limited time. The following HIV/AIDS housing resources are available to residents on a countywide basis:

- Aid Services Foundation has 18 beds in its transitional housing program
- Gerry House has six beds in their six-month transitional housing recovery program with set-aside beds for those with HIV/AIDS
- Emmanuel House is a 21-bed transitional housing program
- Straight Talk, Inc. has six beds in its Start House transitional housing program

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

The City does not receive HOME funds.

**Discussion:**

A percentage of the City's population has special needs that may require unique housing options and services. These special needs groups include senior and frail elderly, the disabled, victims of domestic violence, and persons with HIV/AIDS. While housing and service programs are available to these special needs populations, additional resources may be needed to address individual needs.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

Based on responses to the City's community needs survey, improving parks and recreation facilities are priorities. The City is addressing this community priority, as evident by the recent completion of a new community center and senior center, and the construction of new sports and recreation facilities. A comprehensive needs assessment of the City's parks was recently completed, which identified improvements for the community's parks, including new playground equipment, improvements to courts and fields, and installing/upgrading landscaping and other facilities such as restrooms.

Whenever the City contemplates improvements to public facilities, it must consider the implications of compliance with the American with Disabilities Act. Public agencies, such as the City, are required under the American with Disabilities Act of 1990 (ADA) to perform "self-evaluations" of their current facilities relative to the accessibility requirements of the ADA. Under this law, the City must have a plan to make public facilities ADA accessible. The City has developed a Transition Plan that details which public facilities do not meet current ADA requirements. Some of the improvements identified in the Transition Plan may be addressed with CDBG funding.

### **How were these needs determined?**

*2025 Consolidated Plan Community Survey* and city staff.

### **Describe the jurisdiction's need for Public Improvements:**

Top issues identified by the community in the *2025 Consolidated Plan Community Survey* include water/sewer system improvements, residential street improvements, and sidewalk improvements. Water, sewer, and storm water infrastructure and services are provided by other public agencies or special districts, and may not be CDBG-eligible. Budget consideration may be given to other identified priorities such as residential streets and sidewalks improvements within CDBG-eligible areas. The City's ADA Transition Plan also identifies numerous curb ramps that need upgrading to current ADA standards.

### **How were these needs determined?**

*2025 Consolidated Plan Community Survey* and city staff.

### **Describe the jurisdiction's need for Public Services:**

Based on responses to the *2025 Consolidated Plan Community Survey*, health and youth services are identified as highly needed. Other need priorities include senior services and childcare. Among homeless services, outreach, mental/behavioral health services, homelessness prevention, and emergency shelter are ranked as the highest needs.

**How were these needs determined?**

*2025 Consolidated Plan Community Survey* and consultation with local service providers.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The purpose of the Market Analysis is to provide a clear picture of the City's housing market, including the significant characteristics of housing supply, housing conditions, and cost. The Housing Market Analysis, in conjunction with the Needs Assessment, will provide the basis for the Strategic Plan to identify programs and projects to be funded and administered as part of the CDBG program.

Most of the data tables in this section are populated by default with data from the Comprehensive Housing Affordability Strategy (CHAS), the special tabulation of housing data produced by the Census Bureau for HUD. Additional data is derived from the American Community Survey (ACS) and other updated sources. The Market Analysis will also examine barriers to affordable housing, including impediments to fair housing choice.

Based on the data reviewed in the Needs Assessment and the following Market Analysis, several characteristics of the City's housing market have indicated that affordable housing is a key issue in the City. As such, the City has given this Need a High Priority level in the Consolidated Plan. Currently there is a large need for homes to accommodate small families and alleviate the significant overcrowding occurring that is disproportionately impacting those low- and moderate-income residents. As the City's population continues to age, there may be less pressure on the housing market for larger homes and greater need for smaller, more affordable homes, since only 13 percent of the housing stock is made up of efficiencies and one-bedrooms. Additionally, there are very limited ownership opportunities for these smaller units (2%) that would benefit seniors and single households; thus, balance will be needed when approving development projects.

In the last decade, the City has continued to pursue affordable housing development; however, the lack of monetary resources available to create new affordable housing units of adequate size and lack of current inventory, housing affordability and overcrowding problems for Small Families will continue to be a challenge to the community during the period of the FY 2025-2030 Consolidated Plan.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

HUD defines a housing unit as a house, an apartment, or a single room, occupied as a separate living quarter, or if vacant, intended for occupancy as a separate living quarter. This section of the Consolidated Plan will assess the housing characteristics of the City's housing supply, including unit type and tenure, age, condition, affordability, and availability.

Based on data from Table 27, Lake Forest's housing stock is primarily comprised of one-unit structures (approximately 73%). The data further shows the City has a total of 30,750 housing units with a small number of mobile homes that represent 4% of the housing stock.

According to Table 28, the majority (70.1%) of the City's housing units are owner-occupied, and 29.9% are renter-occupied. However, based on bedroom mix, ownership is very limited for smaller households, as

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	17,165	56%
1-unit, attached structure	5,280	17%
2-4 units	1,565	5%
5-19 units	4,040	13%
20 or more units	1,545	5%
Mobile Home, boat, RV, van, etc	1,155	4%
<b>Total</b>	<b>30,750</b>	<b>100%</b>

**Table 27 – Residential Properties by Unit Number**

Data Source: 2016-2020 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	60	0%	385	4%
1 bedroom	475	2%	2,550	29%
2 bedrooms	3,840	19%	3,220	37%
3 or more bedrooms	16,280	79%	2,540	29%
<b>Total</b>	<b>20,655</b>	<b>100%</b>	<b>8,695</b>	<b>99%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2016-2020 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

The City's 2021–2029 Housing Element identified 398 affordable housing in the City distributed within several housing developments. The affordability covenants for several of these developments have expired; however, an updated listed of assisted units is available:

- AFH Affordable Housing Condo: 1 unit for lower-income families
- SCO Transitional Housing Condo: 8 units for lower-income families
- Madrid Transitional Housing Condo: 2 units for lower-income families
- Saguaro Apartments: 3 units for lower-income families
- Arroyo at Baker Ranch: 187 units for lower-income families
- **Mountain View Apartments: 70 units for lower-income families**
- **The Meadows Senior Apartments: 64 units for lower-income seniors**

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

Of the 264 affordable units listed in the 2021-2029 Housing Element, affordable housing covenants have expired on 253 units. Affordable housing covenants on eight (transitional) units will expire between 2022 and 2026.

**Does the availability of housing units meet the needs of the population?**

The Southern California Association of Governments (SCAG) undertakes a Regional Housing Needs Assessment (RHNA) to quantify the anticipated need for housing within a five-county region. California General Plan law requires the City to have land zoned to accommodate its fair share of the regional housing need as calculated by SCAG. The goal of the RHNA is to ensure an equitable distribution of housing among jurisdictions within SCAG's region so that every community provides for a mix of housing for all economic segments. The housing allocation targets are not building requirements; instead, they are planning goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period. The distribution of housing needs by income category for each jurisdiction is adjusted to avoid an overconcentration of lower-income households in any community. For the current planning period (2021 through 2029), the City's RHNA allocation is 2,727 new housing units.

According to a recent article in the *Orange County Register*, "California needs between 1.8 million and 3.5 million new homes by 2025. To get there, cities and counties would have to approve two to four times the number of homes they've been permitting in the past few years. But instead of approving more homes, almost every California city and county is falling behind its state-mandated housing goal...." ["California needs more housing, but 97% of cities and counties are failing to issue enough RHNA

permits.” Published December 9, 2019, *O.C. Register*.] According to this article, the City is not on track to issue sufficient housing construction permits to meet current RHNA goals. State and SCAG planners are in the process of establishing RHNA goals for jurisdictions for the next planning cycle. These goals are yet to be finalized. Once established, the City will evaluate options to comply with applicable State requirements.

HUD data from Table 9 estimates that 7,026 lower-income Lake Forest households have a housing cost burden. Based on the current supply of housing units, there appears to be a gap of housing units affordable to many residents, especially lower-lower income households.

### **Describe the need for specific types of housing:**

As previously outlined in the Housing Needs Assessment, housing costs in the region and specifically the City, present an issue for many households regardless of income, size, or tenure. Among lower-income households, senior and small related households appear to be experiencing housing costs challenges at a higher rate.

### **Discussion**

The City’s housing stock is comprised primarily of single units. State and regional planners have established goals for all jurisdictions to create an environment to allow for the creation of housing that is affordable to different income levels. While the City has encouraged the development of many housing units, there appears to be a need for additional units, particularly affordable to lower-income households.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

It is reported that the median home sales price in Orange County in December 2019 was \$840,000 – the second highest on record. [“Buyer competition fuels 16% jump in Southern California house sales.” *Orange County Register*, published January 17, 2020.] The rise in home sales prices has been driven by low interest rates and a low supply of available housing units. According to Zillow.com, in January 2020, the median home sales price in Lake Forest was \$736,702, a 40.5% increase from the 2015 median value listed in Table 29. With respect to rents, Zillow reports the median Lake Forest list rent in January 2020 was \$3,100.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	524,400	682,700	30%
Median Contract Rent	1,619	2,009	24%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	365	4.2%
\$500-999	155	1.8%
\$1,000-1,499	525	6.0%
\$1,500-1,999	3,350	38.6%
\$2,000 or more	4,290	49.4%
<b>Total</b>	<b>8,685</b>	<b>100.0%</b>

Table 30 - Rent Paid

Data Source: 2016-2020 ACS

### Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	335	No Data
50% HAMFI	510	565
80% HAMFI	3,900	1,220
100% HAMFI	No Data	2,854
<b>Total</b>	<b>4,745</b>	<b>4,639</b>

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	2,200	2,344	2,783	3,769	4,467
High HOME Rent	1,826	1,958	2,352	2,708	3,001
Low HOME Rent	1,381	1,479	1,776	2,051	2,288

**Table 32 – Monthly Rent**

**Data Source:** HUD FMR and HOME Rents

## Is there sufficient housing for households at all income levels?

Based on HUD data tables above, it appears there is a limited supply of housing units affordable to lower income households. With a median home price of \$736,702 and a current median list rent of \$3,100, it is evident there is an insufficient supply of affordable housing for households at most income levels. The *2019-20 Community Indicators*, produced by the Orange County Business Council, concludes a minimum annual income of \$110,160 is needed to purchase an entry-level home in Orange County (estimated at \$680,000). This income requirement exceeds the average annual salary of many occupations, such as retail sales clerks, secretaries, computer programmers, elementary school teachers, and nurses. The *2019-20 Community Indicators* also finds that “To afford a median-prices one-bedroom apartment in 2019, an Orange County resident would need to make \$31.38 per hour – equivalent to an annual income of \$66,310... A minimum wage worker in Orange County would have to work 105 hours a week to afford a one-bedroom apartment, 131 hours to afford a two-bedroom unit, and 183 hours to afford a three-bedroom.” [2019-20 Orange County Community Indicators, page 54-58.]

## How is affordability of housing likely to change considering changes to home values and/or rents?

The California Association of Realtors reports that current economic trends indicate a continued strong housing market in Orange County. Contributing economic indicators include low inflation, low unemployment, low-interest rates, and high consumer confidence. In response to a perceived affordable housing crisis in the State, as 2019 came to an end, the State legislature passes a series of housing bills aimed at easing the housing crisis. Measures such as AB 1482 will limit annual rent increases to 5% and requires landlords to have “just cause” when evicting a tenant. Other bills open the door for building additional housing units by right and allowing higher densities in certain transit districts. These enacted housing bills will most likely change the State, regional, and local housing market; however, both intended and unintended consequences of these bills remain to be understood.

## How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The City of Lake Forest is not a participating jurisdiction in HUD's HOME program; however, HUD's current rent limits for the program are listed in Table 32. Based on a comparison of these rent levels to rents listed on certain on-line housing services, it is evident that significant subsidies or other concessions would be necessary to create units that are affordable to lower-income households.

## **Discussion**

Orange County remains one of the nation's most expensive housing markets. Data indicates that median home sales prices and monthly rents are out of reach of many lower-income and moderate-income households. Current economic trends also indicate housing costs will likely remain out of reach of many of the region's residents. The State of California has taken legislative action to address a growing housing shortage; however, the future impacts of this legislation are unknown.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

Assessing housing conditions in a City can provide the basis for developing policies and programs to maintain and preserve the quality of life. Deteriorating housing conditions depress property values and can discourage reinvestment in a community. Consequently, maintaining or improving housing conditions is often an important goal for cities.

### Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

Substandard Condition: A dwelling unit that contains a condition that endangers the life, limb, health, property, safety, or welfare of the public or the occupants. The conditions that make a property a substandard unit are defined in the California Health & Safety Code Section 17920.3.

Substandard Condition but suitable for Rehabilitation: For purposes of the CDBG program, this term means that the cost of remedying all substandard conditions plus the current value of the property does not exceed the after-rehabilitation value of the property.

Housing Problems: As defined by HUD:

1. Lack of complete kitchen or plumbing facilities
2. More than one person per room
3. Cost burden greater than 30%

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	6,120	30%	4,690	54%
With two selected Conditions	90	0%	515	6%
With three selected Conditions	10	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	14,430	70%	3,480	40%
<b>Total</b>	<b>20,650</b>	<b>100%</b>	<b>8,685</b>	<b>100%</b>

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,780	9%	1,090	13%
1980-1999	9,915	48%	4,485	52%
1950-1979	8,870	43%	3,100	36%
Before 1950	85	0%	20	0%
<b>Total</b>	<b>20,650</b>	<b>100%</b>	<b>8,695</b>	<b>101%</b>

**Table 34 – Year Unit Built**

Data Source: 2016-2020 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	8,955	43%	3,120	36%
Housing Units build before 1980 with children present	2,860	14%	1,935	22%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

**Table 36 - Vacant Units**

Data Source: 2005-2009 CHAS

## UPDATED INFORMATION

There are limited data sources regarding vacant units and REO properties within the City. Based on data from the State of California Department of Labor, as of January 1, 2019, the City's housing vacancy rate is 3.7% (approximately 1,100 units). Based on information from RealtyTrac, in December 2019, there were 28 properties in Lake Forest that were in some stage of foreclosure (default, auction or bank owned).

## Need for Owner and Rental Rehabilitation

### Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

For determining the number of housing units with lead-based paint, the age of the housing stock is the critical variable. Since 1978, the federal government has prohibited the use of lead-based paint on residential property; however, national studies estimated that 75% of all residential structures built before 1978 contain lead-based paint (LBP). However, not all units with LBP present a hazard. Only testing for lead in dust, soil, deteriorated paint, chewable paint surfaces, friction paint surfaces, or impact paint surfaces will provide information about hazards. Overall, these conditions are not prevalent in Lake Forest.

According to the data in Table 35, approximately 47% of the City's housing stock (12,663 units) was built before 1980 and may contain LBP. Most impacted by lead hazards are children under six years of age. HUD data estimates there are 4,380 housing units in the City with children present, that may have a lead-based paint issue. The State of California and the County of Orange Department of Public Health report that in 2018, 1.02% of 32,426 children under age six that were screened for blood lead levels (BLL), had a BLL over 4.5 micrograms of per deciliter ( $\mu\text{g}/\text{dL}$ ). (4.5  $\mu\text{g}/\text{d}$  is the BLL level the Center for Disease Control and Prevention (CDC) considers "high"). The most recent data regarding elevated BLL for Lake Forest children less than age six is from 2012. In 2012, the CDC reports that 13 of 737 children tested had BLL greater than 4.5  $\mu\text{g}/\text{d}$ . This data is not specific to lead-based paint; nonetheless, the data indicate that elevated blood lead among the City's young children is not a significant issue. Regardless, the City will take proactive action to educate parents of the developmental issues to young children associated with lead and will address lead-based paint hazards as part of its housing rehabilitation programs.

## **Discussion**

In general, Lake Forest's housing stock is well maintained and in good to excellent condition; however, it is important to note that a significant percentage of the housing stock is over 30 years old. After 30 years, homes may begin to require substantial maintenance and even extensive rehabilitation (e.g., roof, electrical, plumbing). Additionally, some residences constructed before 1978 may have lead-based paint hazards.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The City of Lake Forest does not own or operate any public housing units.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				9,925			879	1,669	0
# of accessible units									

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 37 – Total Number of Units by Program Type**

**Data Source:** PIC (PIH Information Center)

**Describe the supply of public housing developments:**

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

Not applicable

## Public Housing Condition

Public Housing Development	Average Inspection Score

Table 38 - Public Housing Condition

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

Not applicable

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

Not applicable

### **Discussion:**

The City of Lake Forest does not own or operate any public housing units.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

As previously discussed, the OC-CoC conducts a biennial point in time count and survey of the region's homeless. The 2024 Point-In-Time Survey also includes an inventory of homeless shelter resources. Information presented in Table 39 identifies homeless shelter beds in Lake Forest.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	35	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

**Table 39 - Facilities and Housing Targeted to Homeless Households**

Data Source Comments:

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons**

The City of Lake Forest does not provide direct services for the homeless; however, it does fund nonprofit agencies that provide housing and support services for homeless Lake Forest residents. Case managers at these service agencies work closely with clients to identify appropriate mainstream services available to them and guide them through the qualification process. Examples of mainstream services include veterans housing vouchers, veteran medical services, MediCal/Medicare, SSI, and general relief.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

As indicated in Table 39, the OC-CoC identifies 35 transitional housing beds in Lake Forest. These shelter beds are reserved for homeless families.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

HUD requires that the Consolidated Plan describe, to the extent information is available, facilities, and services that are available assist persons who are not homeless but that have special needs.

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

Senior and Frail Elderly: There are several skilled nursing and residential care facilities located in Lake Forest. According to the California Department of Social Services Community Licensing Division, there are 805 residential care beds in 47 facilities in Lake Forest. The bulk of these facilities are six-bed facilities operating in residential neighborhoods. There are no subsidized senior housing units in the City; however, there are two complexes that offer 57 and 64 affordable senior housing units respectively.

Group Homes/Quarters: The State reports that as of January 2025, there are 515 Lake Forest residents living in group housing. Examples of group housing included homes for the mentally disabled and physically disabled, seniors, and those recovering from substance addiction. In recent years some recovery homes have had negative impacts on residential neighborhoods. Due to current federal and state regulations, the City's ability to take specific enforcement action is limited; nonetheless, the City continues to seek different avenues to address and mitigate some of the neighborhood impacts caused by problematic operators.

HIV/AIDS Housing: As previously outlined, there are no shelters or permanent housing units for persons with HIV/AIDS in Lake Forest.

Public Housing Residents: There is no public housing in Lake Forest. As of April 2025, a total of 203 households in Lake Forest are receiving a rental housing voucher or certificate from OCHA.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

In Lake Forest, while not necessarily receiving CDBG funding, several programs and resources are available throughout the city to assist individuals transitioning from mental health facilities into supportive housing. Here are some key services:

- **2-1-1 Orange County:** A 24/7 helpline that connects people to services like housing, healthcare, food, and mental health support.

- **Lake Forest Homeless Engagement and Resources Team (LFHEART):** Provides access to shelter, mental health care, legal help, housing referrals, and other support for people experiencing homelessness.
- **Lake Family Resource Center:** Supports survivors of domestic violence with rent assistance, counseling, safety planning, and legal advocacy. **Orange County Rescue Mission:** Offers transitional housing, food, job training, mental health services, and addiction recovery program tailored for veterans, families, youth, victims of domestic violence, and victims of sex trafficking.
- **Collaboration with organizations like:** Age Well Senior Services, Camino Family Health Center, Families Forward, Families Assistance Ministries, and South County Outreach to provide housing assistance, employment opportunities, mental health services, and basic necessities.
- **Collaboration with the County of Orange to offer various housing assistance programs including:**
  - **Housing Choice Voucher Program:** assists low-income individuals and families with rental housing.
  - **Affordable Housing Developments including:**
    - **The Arroyo at Baker Ranch:** A 189-unit affordable family apartment community.
    - **Portola Senior Apartments:** A 57-unit affordable housing project for seniors aged 62 and older.
    - **Mountain View Apartments:** A 71-unit affordable housing project currently under construction.
    - **The Meadows Senior Affordable Apartments:** A 65-unit complex, including 64 senior affordable units and one manager's unit.

These resources aim to provide comprehensive support for individuals transitioning from mental health facilities, ensuring access to appropriate housing and essential services in Lake Forest.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The City will continue to support various local organizations each year of the Consolidated Plan that provide services to persons with special needs. Agencies funded will depend on applications received annually through the City's NoFA. For the first year of the plan, the following service providers will be funded:

- Age Well Senior Services
- Boys & Girls Club of Laguna Beach
- Camino Health Services
- Fair Housing Council of OC
- Families Forward
- Family Assistance Ministry

- South County Outreach

The City will also continue to support the efforts of OCHA to obtain additional housing vouchers and certificates for disabled, elderly, and other special needs households. Additionally, as new housing opportunities are designed and developed, the City will work with developers to ensure accessible units are incorporated into projects as required by federal and state regulations.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

The City does not receive HOME funds either directly as an entitlement or indirectly through a consortium.

## MA-40 Barriers to Affordable Housing – 91.210(e)

### Negative Effects of Public Policies on Affordable Housing and Residential Investment

Lake Forest's Housing Element for the 2021-2029 planning period identifies several constraints to affordable housing development. Key constraints include:

**1. Limited Availability of Residential Land:** Lake Forest has largely developed its residentially designated lands, with future residential development primarily limited to recycling existing units and completing infill development. While the city's sphere of influence contains substantial vacant land suitable for new development, additional residential development is planned in areas like Portola Hills and Foothill Ranch, which may not be immediately accessible for affordable housing projects.

**2. High Development Standards:** The city's mixed-use zoning regulations, designed to encourage residential development, impose certain standards that could be seen as constraints. For example, the Mixed-Use 43 (MU 43) district allows a maximum density of 43 dwelling units per net acre and a maximum Floor Area Ratio (FAR) of 1.2:1, with building heights limited to 65 feet. While these standards aim to promote development, they may not fully align with the affordability objectives of the Housing Element.

**3. Infrastructure and Service Constraints:** Ensuring that adequate infrastructure and services are available to support new affordable housing developments can be a constraint. The Housing Element Sites Inventory Regulations require that residential developments on rezone sites permit at least 16 units, with a minimum residential density of 20 dwelling units per net acre. This density requirement may necessitate significant infrastructure enhancements, posing challenges to affordability.

**4. Market Constraints:** The broader housing market in Orange County, characterized by high land and construction costs, poses challenges to developing affordable housing in Lake Forest. These market conditions can make it difficult for developers to produce housing that is affordable to low- and moderate-income households without substantial subsidies.

Addressing these constraints requires a multifaceted approach, including revising zoning regulations to allow for greater residential densities, ensuring that infrastructure improvements are cost-effective, and exploring financial incentives to make affordable housing projects more viable.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

According to the data from Table 40, the top business sectors in Lake Forest are Education and Health Care Services Professional, Scientific, Management Services Arts, Entertainment, Accommodations Retail Trade, accounting for 57 percent of workers.

Data from Table 41, shows the City has a workforce of 47,845 individuals, which is an increase of 4,345 from the last Plan. The unemployment rate of 4.88% is a slight decrease from the last Plan, which reported an unemployment rate of 5.63%; however, the unemployment rate for young adults is significantly higher at 17.51%. Major sectors include Management, business and finance, Sales and office, and Service occupations (Table 42). The majority of workers can get to work in less than an hour, with only 7 percent reporting a longer commute (Table 43). Workers are mostly well educated with only 6 percent being less than a high school graduate and 82 percent having some type of college education (Table 44). When looking at the data in Table 45 (level of educational attainment by age), it appears that approximately 23% of the City's seniors have less than a college education, which would indicate more of a burden on their already fixed incomes. Most of these seniors probably don't have a pension and rely on social security. As shown in Table 46, median earnings for those with high school equivalent or less are less than \$63,000 per year.

### Economic Development Market Analysis Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	230	95	1	0	0
Arts, Entertainment, Accommodations	5,026	4,387	12	12	-1
Construction	2,193	3,252	5	9	3
Education and Health Care Services	6,237	3,253	15	9	-7
Finance, Insurance, and Real Estate	3,591	3,714	9	10	1
Information	1,357	563	3	2	-2
Manufacturing	3,939	4,767	10	13	3
Other Services	1,308	1,410	3	4	1
Professional, Scientific, Management Services	5,958	6,702	15	18	3
Public Administration	0	0	0	0	0
Retail Trade	4,059	3,170	10	8	-2
Transportation and Warehousing	950	214	2	1	-2
Wholesale Trade	2,683	3,349	7	9	2
Total	37,531	34,876	--	--	--

**Table 40 - Business Activity**

**Data** 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)  
**Source:**

## Labor Force

Total Population in the Civilian Labor Force	47,845
Civilian Employed Population 16 years and over	45,505
Unemployment Rate	4.88
Unemployment Rate for Ages 16-24	17.51
Unemployment Rate for Ages 25-65	3.34

**Table 41 - Labor Force**

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	17,570
Farming, fisheries and forestry occupations	1,215
Service	4,365
Sales and office	10,045
Construction, extraction, maintenance and repair	2,085
Production, transportation and material moving	1,450

**Table 42 – Occupations by Sector**

Data Source: 2016-2020 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	25,388	63%
30-59 Minutes	11,809	29%
60 or More Minutes	2,904	7%
<b>Total</b>	<b>40,101</b>	<b>100%</b>

**Table 43 - Travel Time**

Data Source: 2016-2020 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,330	205	1,085
High school graduate (includes equivalency)	4,565	205	1,410
Some college or Associate's degree	11,315	630	2,385
Bachelor's degree or higher	19,860	570	3,730

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2016-2020 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	200	230	435	1,010	475
9th to 12th grade, no diploma	410	690	515	735	355
High school graduate, GED, or alternative	1,685	1,355	1,335	3,495	1,860
Some college, no degree	2,685	2,845	2,210	5,205	2,495
Associate's degree	440	1,035	800	2,235	1,075
Bachelor's degree	990	4,370	4,145	7,285	3,070
Graduate or professional degree	50	1,680	2,770	3,945	2,150

**Table 45 - Educational Attainment by Age**

Data Source: 2016-2020 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	60,706
High school graduate (includes equivalency)	63,010
Some college or Associate's degree	88,662
Bachelor's degree	135,120
Graduate or professional degree	191,934

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2016-2020 ACS

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

According to Table 40, three major business activity sectors account for 41% of total “workers” and 37% of total “jobs.”

- Professional, Scientific, Management Services – 15% of Workers and 15% of Jobs
- Education and Health Care Services – 14% of Workers and 11% of Jobs
- Arts, Entertainment, Accommodations – 12% of Workers and 11% of Jobs

Other leading business sectors include manufacturing, retail, and finance, insurance, and real estate. This data corresponds with the profile of several of the City’s top employers.

**Describe the workforce and infrastructure needs of the business community:**

The City has established an aggressive economic development program to attract and retain employers to the community. A City webpage provides comprehensive information regarding the City’s economic development program. Infrastructure improvements to support the expansion or revitalization of business and industrial centers are incorporated into the City’s Capital Improvement Budget. In addition to improvements to roads, parkways, and storm drains, the City may explore the feasibility of installing a high-speed fiber-optic network. A fiber internet uses fiber-optic lines, which are cables made of bundled strands of glass. Each glass strand acts as a conduit for light signals that relay digital code from one end to the other at the speed of light. This technology allows for internet speeds far beyond DSL and cable because each fiber-optic line can carry multiple signals at top speeds simultaneously.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

The City has a strong commitment to fostering job creation and retention for Lake Forest businesses. The City demonstrates this commitment via the Growing and Retaining Our Workforce (GROW) program. The economic impacts of the Coronavirus pandemic remain unknown, however recent news reports indicate significant unemployment in most sectors of the local, state, and national labor markets. In response, the City allocated CDBG-Coronavirus (CDBG-CV) funds authorized by the CARES Act of 2020, for a small business assistance program. A portion of regular CDBG funds may be allocated on a short-term basis to assist local businesses create or retain jobs for lower-income individuals.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

The Orange County Business Council *2020 Orange County Workforce Indicators Report* provides a detailed overview of the region's economy. The report identifies economic changes caused by new technologies and how new technology is transforming the workforce, the local economy, and the overall business climate of Orange County. Of all the trends that may impact the workplace, the report indicates, "Artificial Intelligence (AI) has the greatest transformative potential." Furthermore, "While new technologies will likely create more jobs than it replaces in the long term, the labor market may face disruptions and widening skills gaps in the short term.... **Soft skills** will be the key to navigate this transformative period." The report loosely defines soft skills as the ability to work well in a group and demonstrate the "kind of creativity exhibited by writers and painters." Effective leadership, communication, and time management are critical soft skills. According to the Business Council report, "These skills... will likely prove to be some of the most defensible skills in an era of increasing automation ... they will survive long after many technical skills become obsolete."

The *Workforce Indicators Report* further outlines that educators can prepare tomorrow's workers by helping students focus on non-automatable skills and activities such as creative, critical thinking, and teamwork. "Education itself will have to expand into more of a lifelong process rather than just a degree or certificate. As technology and other changes continue to transform jobs, workers will need to constantly develop and refine skills in order to keep up." This workforce report provides examples of how major corporations are finding it more efficient and cost-effective to retrain workers to develop the skills necessary for the future rather than dismissing "redundant" positions and hiring new workers with the required skills.

According to HUD data, the City has a well-educated, professional workforce. Lake Forest's population seems well matched for the region's economy; however, HUD data and recent studies of the Orange County workforce also indicate that a significant percentage of the City's workforce is employed outside of the city limits. Table 43 estimates that 39% of the City's workforce commute time exceeds 30 minutes. A primary goal of the City's economic development initiatives is to create and keep jobs in the City to achieve a better housing-jobs balance and create a vibrant and diverse local economy.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

According to the 2020 Orange County Business Council's *Workforce Indicators Report*, community colleges are playing a critical role in helping Orange County businesses expand. "Community colleges are able to adapt to the needs of a rapidly changing labor market much more quickly than their four-year counterparts, making them essential to many cutting-edge industries." Furthermore, Orange County's community colleges provides students with resources and knowledge to learn skills tailored explicitly for certain careers allowing them to find jobs they are already familiar with, thus reducing the likelihood of unemployment or underemployment. Examples of "Career Education" programs offered at local colleges include Information and Communication Technology, Process Technology, Energy Efficiency and

Renewables, and Science and Medical Technology. The county's universities will continue at the vanguard of research and innovation, which fuels the region's economy.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

No

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

**Discussion**

Lake Forest will continue to support and promote local business attraction and retention, thereby fostering job creation and retention, and coordinating these efforts with job training and placement programs to provide expanded economic opportunities for its low- to moderate-income residents. In response to significant unemployment resulting from the Coronavirus CDBG funds may be allocated on a short-term basis to assist local businesses create or retain jobs for lower-income individuals.

The State of California Employment Development Department reported the unemployment rate for Lake Forest as of December 31, 2024, was 3.5%, this is significantly lower than the 8.2% reported during the last Consolidated Plan.

## MA-50 Needs and Market Analysis Discussion

### Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Housing problems impact low- and moderate- income households disproportionately, compared to higher income households; thus, areas with concentrations of low- and moderate-income households are likely to have high rates of housing problems.

An area of low- and moderate-income concentration is usually defined as a census tract or block group in which the number of low-income persons (defined as persons earning 50 percent or less of the County median income) exceeds 51 percent of the total number of persons. However, the City of Lake Forest is an exception grantee per HUD guidelines and this percentage is 49.9 percent.

Per the 2020 ACS, there are 14 Census Tract block groups considered to be low- and moderate-income, of which eight have high concentrations of over ten percentage points of the overall City percentage as follows:

Tract	Blockgroup	Lowmod	Lowmod_pct
<b>032047</b>	<b>1</b>	<b>775</b>	<b>68.90%</b>
052411	1	1,130	51.50%
<b>052424</b>	<b>1</b>	<b>1,085</b>	<b>66.40%</b>
<b>032014</b>	<b>2</b>	<b>1,025</b>	<b>71.90%</b>
<b>052410</b>	<b>2</b>	<b>400</b>	<b>66.10%</b>
<b>052411</b>	<b>2</b>	<b>1,095</b>	<b>70.60%</b>
052422	2	525	51.50%
<b>052423</b>	<b>2</b>	<b>1,425</b>	<b>61.40%</b>
<b>032014</b>	<b>3</b>	<b>2,055</b>	<b>89.20%</b>
<b>032027</b>	<b>3</b>	<b>975</b>	<b>67.20%</b>
032029	3	835	49.90%
052410	3	1,070	54.50%
052425	4	1,325	56.30%
<b>Total</b>		<b>13,720</b>	

### Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Maps illustrating areas of the City with minority concentrations are illustrated in Figure 2. -income. A comparison of these maps indicates there is some concentration of minority populations, lower-income residents, and housing cost burden.

### **What are the characteristics of the market in these areas/neighborhoods?**

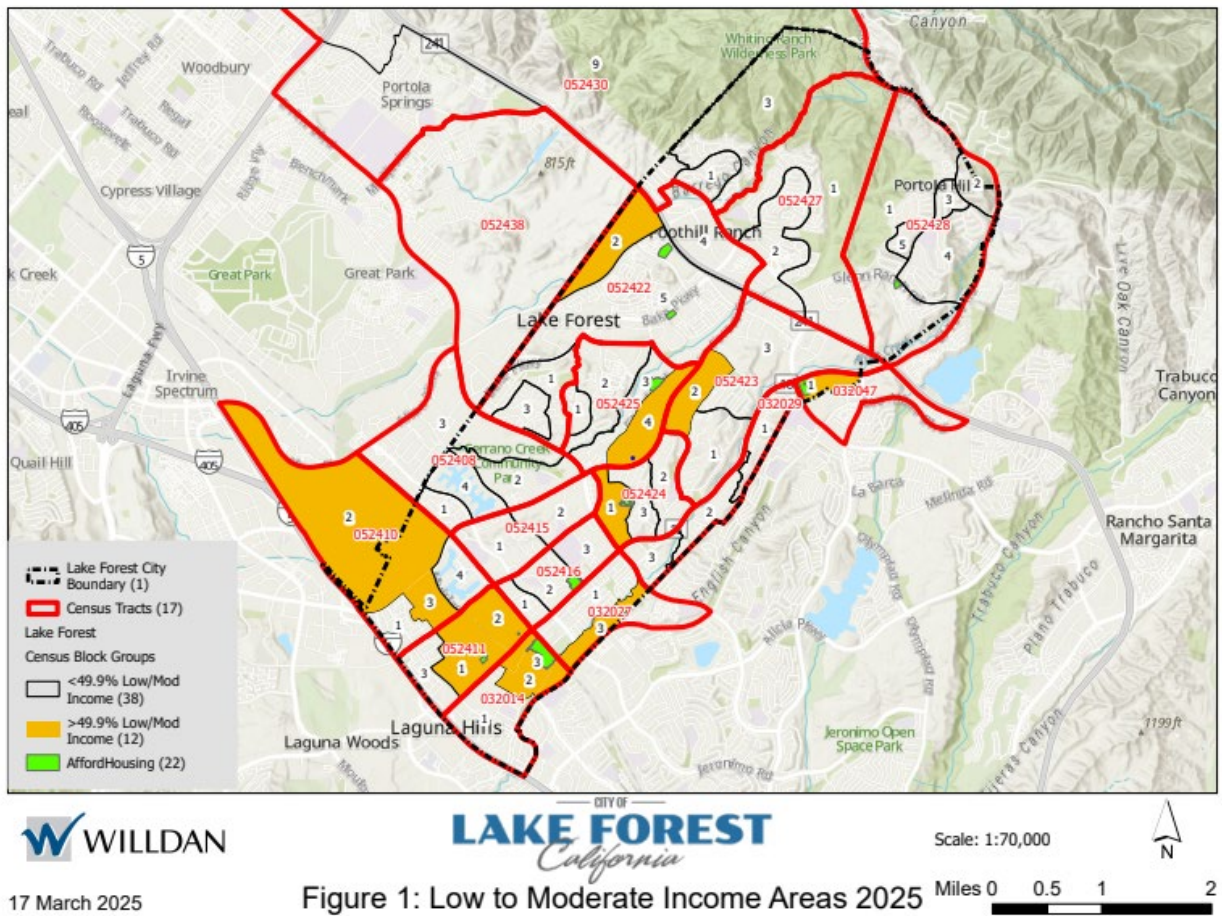
As evident from **Figure 2**, Census Tracts with a percentage of ethnic concentrations are mostly situated in the City's southwest section. **Figure 1** illustrates that this section of the City also has a concentration of CDBG-eligible Block Groups.

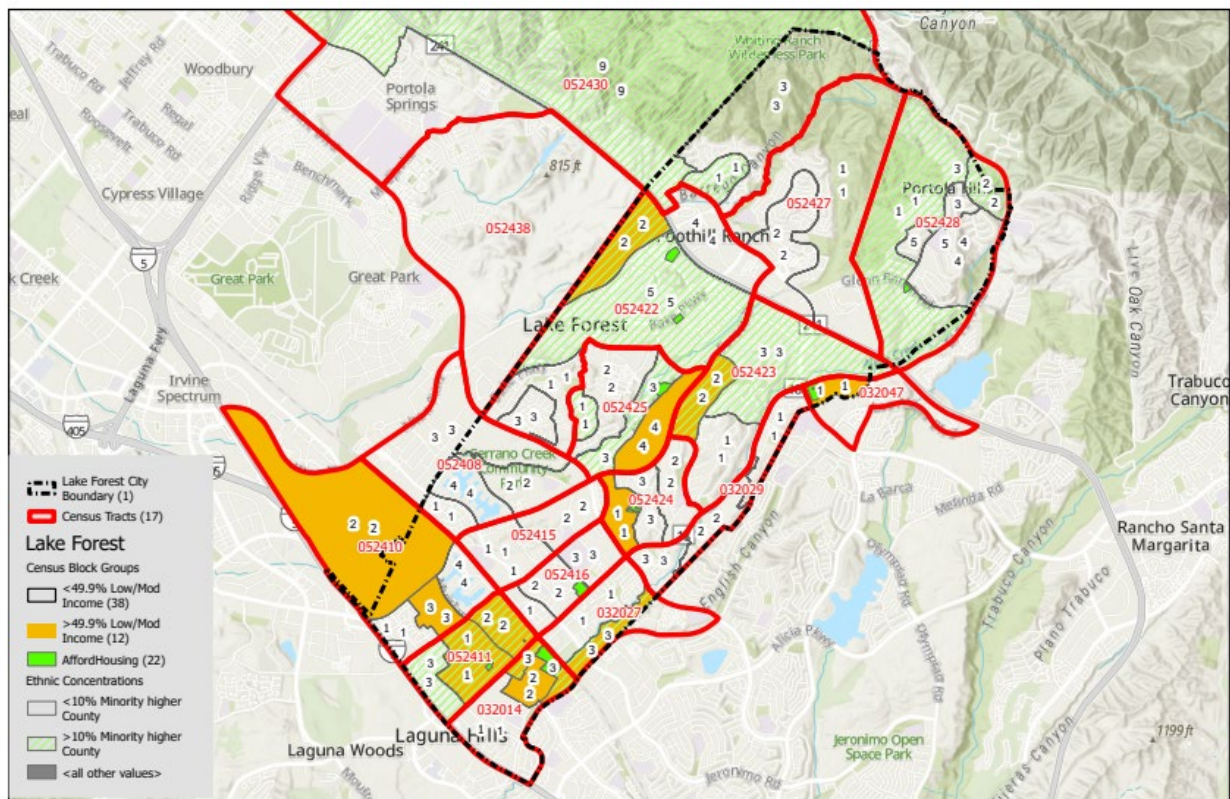
### **Are there any community assets in these areas/neighborhoods?**

Communities within the identified Census Tracts are primarily residential. Local and regional retail and commercial businesses serve the residents of this area, including El Toro Road - the City's primary commercial core. Neighborhood amenities include community parks and middle and elementary schools. Neighborhood schools support several programs that serve lower-income children with supplemental meals and after-school recreation and tutoring programs.

### **Are there other strategic opportunities in any of these areas?**

City planners will examine current land uses within the identified Census Tracts to identify potential opportunities to develop new housing and other amenities to improve the overall quality of life for existing area residents.





17 March 2025

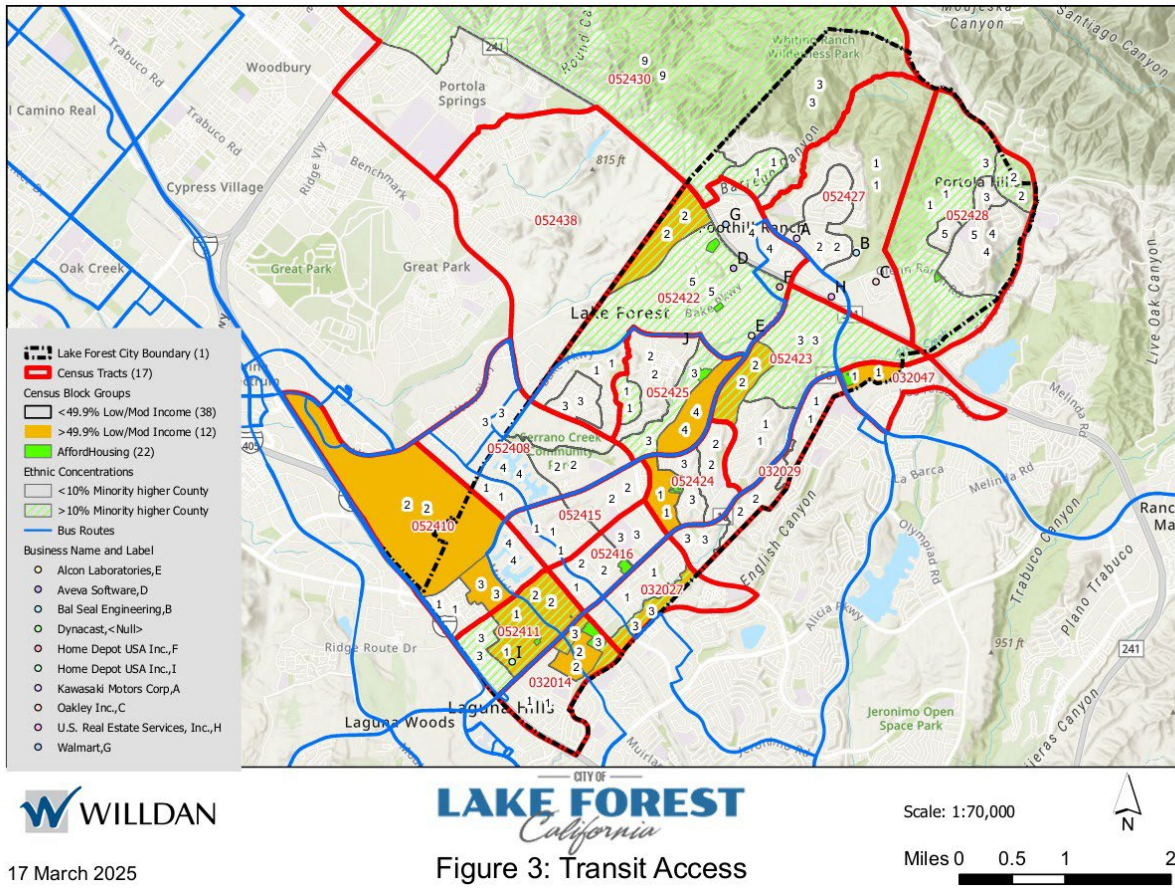


Figure 2: Ethnic Concentrations

Scale: 1:70,000

Miles 0 0.5 1 2





## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

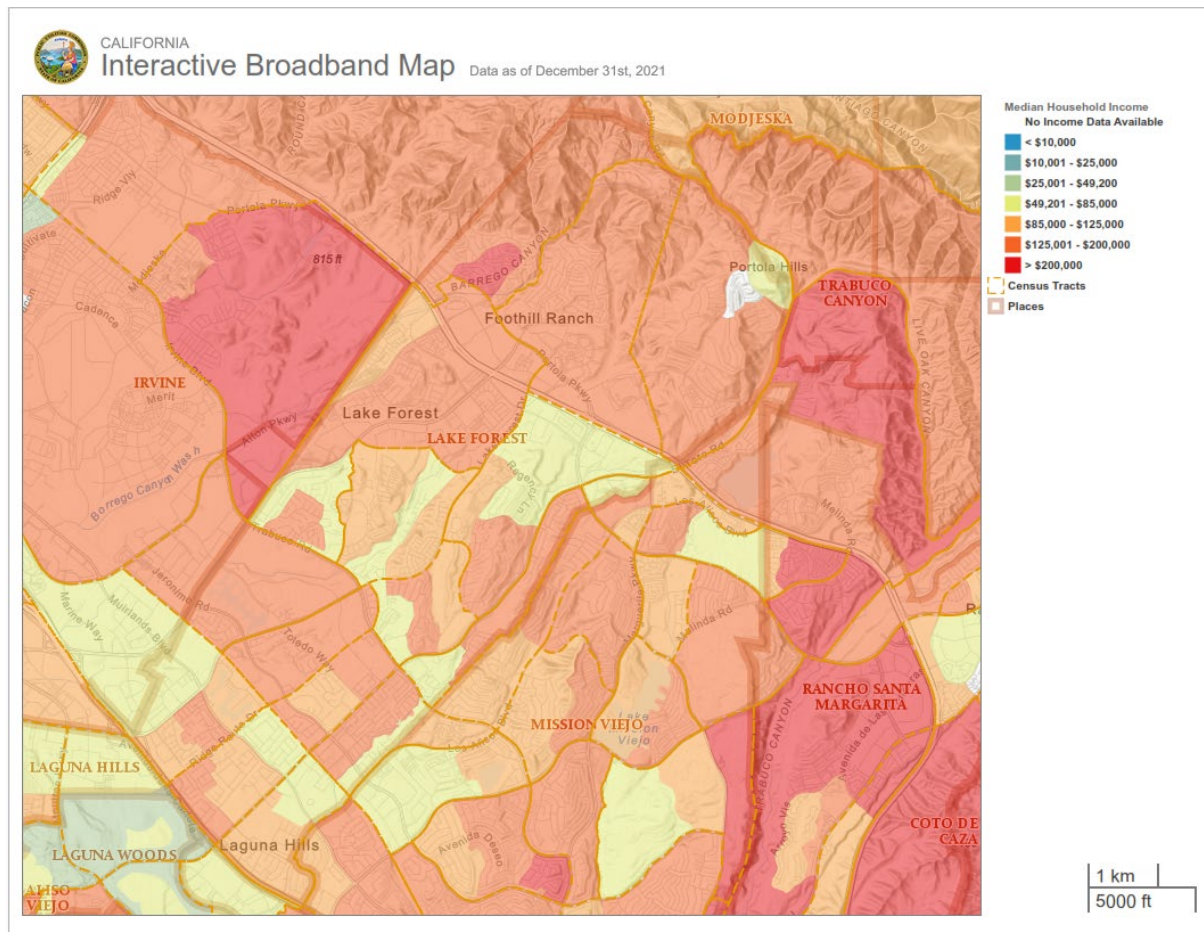
Since 2008, the California Emerging Technology Fund (CETF), in partnership with the state, has tracked internet adoption across California. The 2023 Statewide Digital Equity Survey, conducted with the University of Southern California, reveals continued growth in broadband adoption, particularly among historically disadvantaged groups. However, significant digital equity challenges persist. Notably, the following percentages of key demographics remain unconnected: Non-English Speaking (14.8%), Low Income (13.0%), Rural (10.8%), 60 or Older (9.2%), Reported Disability (8.7%), Veteran (7.7%), Women (6.6%), and LGBTQIA+ (6.6%).

The 2023 Statewide Digital Equity Survey identified cost as the primary barrier to broadband adoption in California. The state's average monthly broadband cost of \$83.60 aligns with national figures, such as the FCC's \$82.40. However, Orange County's average of \$91.50 is significantly higher, ranking second among the counties surveyed. For low-income households, broadband expenses consume an estimated 3.3% of disposable income, exceeding the FCC's recommended 2%. This financial strain underscores the importance of programs like the Affordable Connectivity Program (ACP). Despite this need, ACP awareness in Orange County is only 36.8%. Specific to the City of Lake Forest, the following ACP data has been identified for eligible households: 18% of Total Households in the City of Lake Forest are eligible for ACP Enrollment. Of those households 58% are currently enrolled in the program (858 Households Enrolled out of 42 Households ACP Eligible).

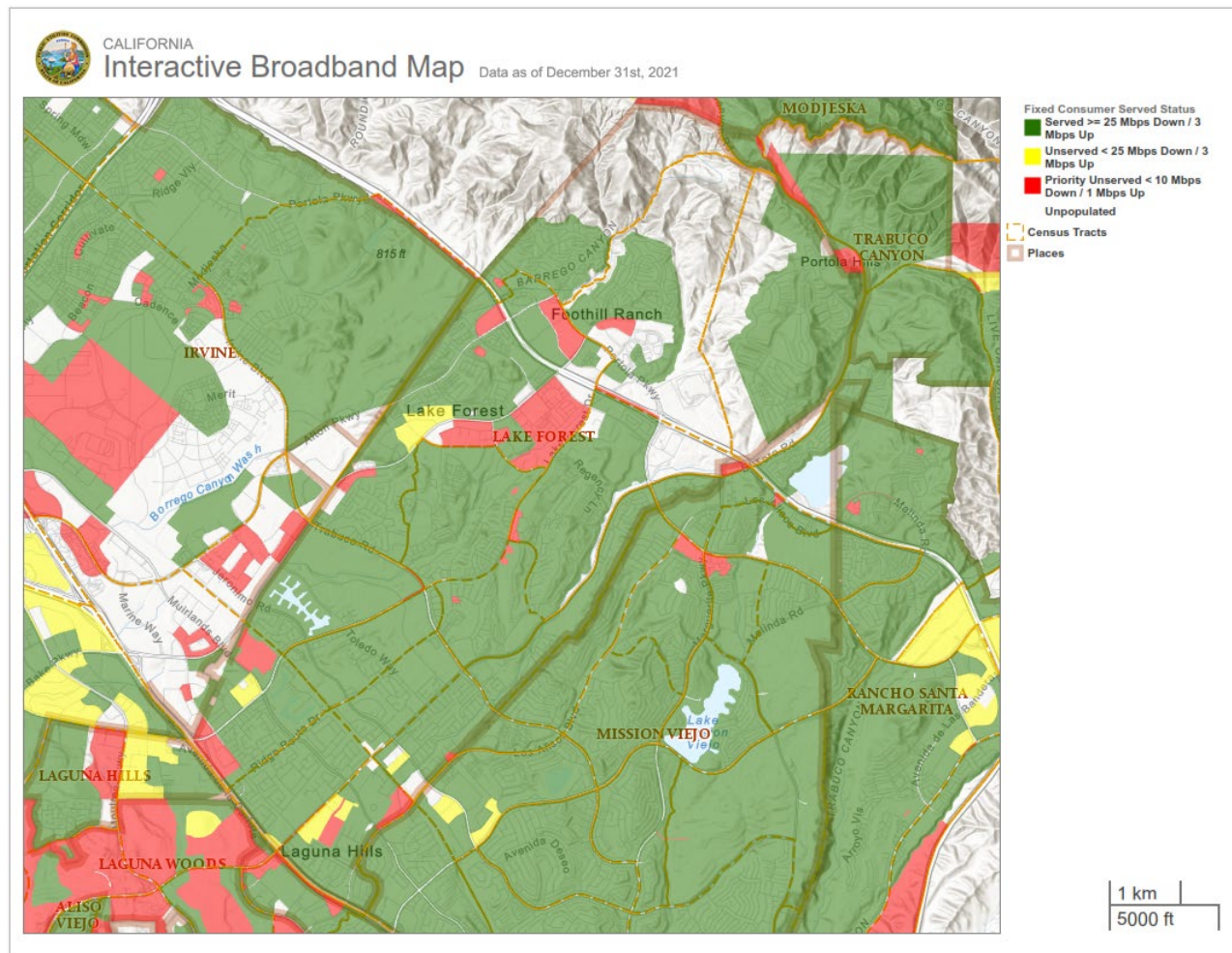
According to ISP Reports, the following internet providers in Lake Forest are ranked amongst the highest rated in the State of California:

1. AT&T
2. Cox Communications
3. T-Mobile Home Internet
4. Verizon

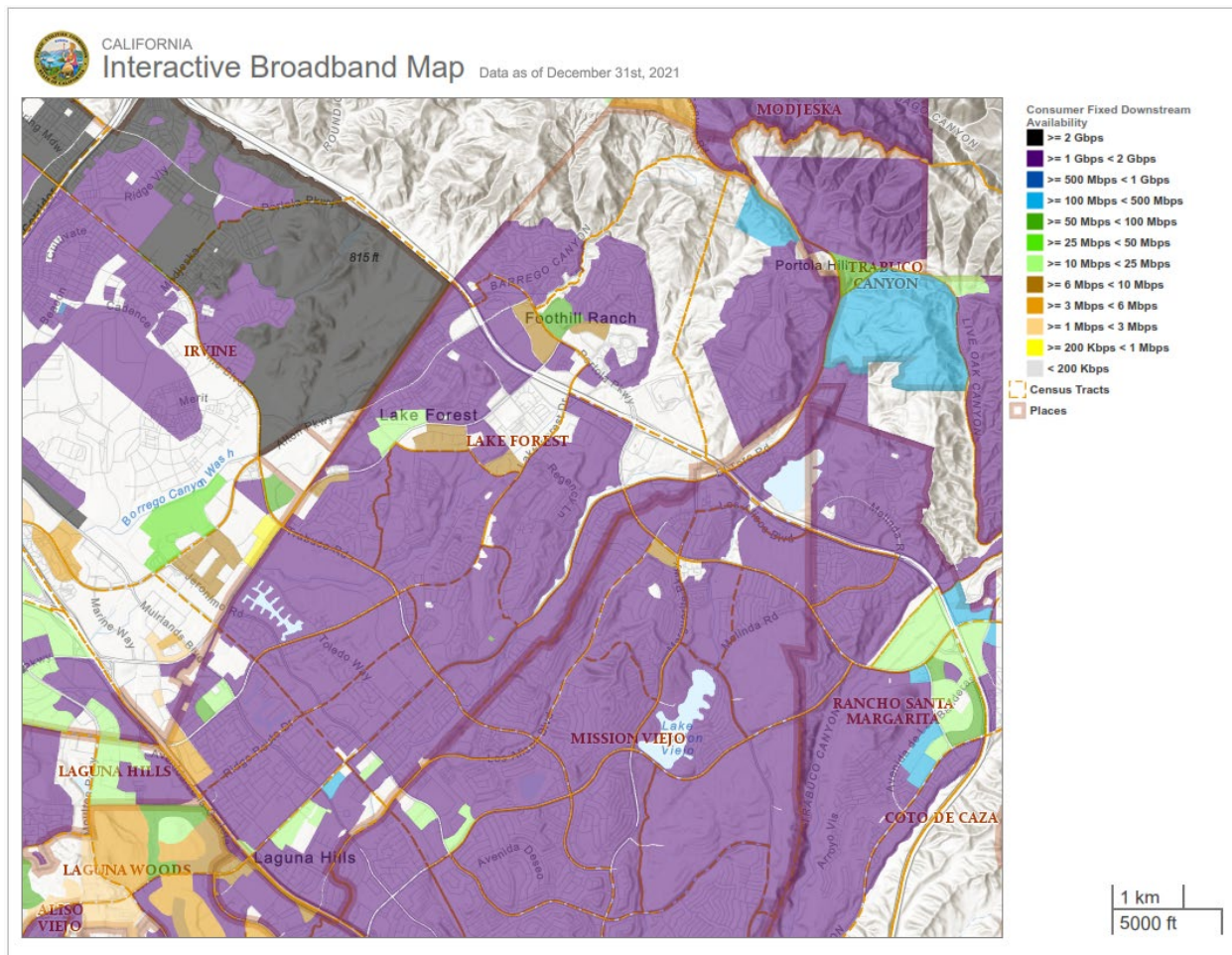
Based on various data sources, including FCC data, Cox Communications is the fastest internet provider in the City of Lake Forest. However, AT&T has the most affordable internet plan options available for broadband services in the City.



Source: California Interactive Broadband Map – Median Household Income as of 12/31/2021



Source: California Interactive Broadband Map – Fixed Consumer Served Status as of 12/31/2021



Source: California Interactive Broadband Map –Consumer Fixed Downstream Availability as of 12/31/2021

## Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Increased competition among internet providers is crucial to delivering both higher-quality and more affordable broadband. This is vital for closing the digital divide, particularly for those with limited or no internet access. The high cost of broadband, exemplified by Orange County's average of \$91.50 per month (compared to the FCC's report national average cost for broadband estimated at \$82.40), is a significant barrier. Promoting competition amongst providers in the City of Lake Forest can result in lower broadband internet service costs, directly addressing the primary reason for households' lack of connectivity amongst low-income households in the City. This is important given that financial assistance to assist with overcoming such barriers can become scarce as funding sources are shifted to address other priorities. An example of this is the recent pause in 2024 to the Affordable Connectivity Program (ACP). Despite the program's success, funding was significantly reduced causing the program to temporarily stop accepting applications from eligible households. With rising costs for goods and services, it is important to continue to drive competition to ensure households have a healthy amount of service options and prices available to choose from.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The City's current General Plan includes a Safety and Noise Element, which contains an assessment of specific natural hazards such as flooding and wildland fires.

- Flooding: There are several water streams and creeks that traverse the City. The potential for flooding in semiarid environments such as Orange County is increased due to the variation and unpredictability in the amount and intensity of rainfall. Portions of the City are subject to inundation from a 100-year flood. Development within the 100-year floodplain is prohibited in floodways unless the development will not obscure flows or increase flood levels.
- Wildland Fires: Lake Forest is subject to both wild and urban fires. The eastern portion of the City is adjacent to the Cleveland National Forest, which is considered a high fire hazard area. The regional natural vegetation is highly prone to wildfire – a hazard that can be exacerbated by prolonged drought.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

The City's General Plan includes a public safety plan that aims to "reduce the risk of death, injury, property damage, economic loss, and harm due to natural and manmade disasters." Through this document, the City has developed policies to address natural hazards such as flooding and fire.

- Develop and maintain an emergency preparedness plan, which will coordinate with the regional plan. The emergency preparedness plan will direct the City's response to emergencies stemming from various types of disasters.
- Continue to participate in the National Flood Insurance Program.
- Reduce the risk of wildland fire through fuel modification programs, especially where natural vegetation interfaces with urban development.

The City is currently updating the General Plan. The 2040 General Plan will provide updates to the City's current planning documents, and will include policies and goals related to "Climate Change and Resiliency Planning." The goal of this planning process is to ensure the City is "A well-prepared community where risks to life, property, the economy, and the environment resulting from climate change, including extreme weather events, are minimized." The Climate Change and Resiliency Plan has the potential to impact all residents regardless of income.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Strategic Plan is the centerpiece of the City of Lake Forest's 2025–2030 Consolidated Plan. The Strategic Plan identifies the programs and projects the City will undertake or consider during the five-year Consolidated Plan cycle. In addition to identifying resources, goals, and objectives to implement housing and community development activities, the Strategic Plan has several sub-strategies, including addressing homeless issues, overcoming barriers to affordable housing, and program/project monitoring efforts.

The City's overall objective for the CDBG program mirrors the HUD's program objective: to create a viable community by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. To this end, the following Consolidated Plan goals have been established based on the consultation and analysis process:

- Improve or expand the supply of housing affordable to lower-income households
- Provide or improve public infrastructure and facilities that benefit low- and moderate-income neighborhoods and residents
- Provide or improve access to public social services for low- and moderate-income persons and persons with special needs
- Provide a continuum of housing and supportive services for the homeless and the near-homeless
- Provide financial assistance to create or preserve employment opportunities for lower-income residents
- Provide program administration and planning activities needed to carry out actions that address needs identified in the Consolidated Plan, including fair housing services to address local impediments to fair housing

All programs and projects are subject to the availability of CDBG funds and the City's annual budget adoption process.

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	CDBG TARGET AREAS
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Other
	Other Revital Description:	INFRASTRUCTURE IMPROVEMENTS
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	Citywide
	Area Type:	Citywide
	Other Target Area Description:	Citywide
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	

	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	

### **General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

CDBG funds will be allocated on a citywide basis for activities that primarily benefit qualified low- and moderate-income households (i.e., limited-clientele activities). Other activities such as public improvements will be limited to eligible areas (see Figure 1), except for ADA related improvements, which may be carried out on a much broader basis.

The City does not receive Housing Opportunities for Persons With AIDS (HOPWA) funds.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 48 – Priority Needs Summary

<b>1</b>	<b>Priority Need Name</b>	Affordable Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Affordable Housing
	<b>Description</b>	Loans, grants, and other forms of subsidies to improve or expand the City's supply of housing affordable to lower-income households
	<b>Basis for Relative Priority</b>	Needs analysis and public input
<b>2</b>	<b>Priority Need Name</b>	Public Improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Moderate Non-housing Community Development
	<b>Geographic Areas Affected</b>	CDBG TARGET AREAS Citywide
	<b>Associated Goals</b>	Infrastructure and Facility Improvements
	<b>Description</b>	Installation of new or rehabilitation of existing public infrastructure and public facility improvements
	<b>Basis for Relative Priority</b>	Needs analysis, City department consultation, and public input
<b>3</b>	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Other
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Public Social Services
	<b>Description</b>	Social service programs that assistance to low- and moderate-income residents (may include fair housing services)
	<b>Basis for Relative Priority</b>	Needs Assessment, service providers input, and public input
4	<b>Priority Need Name</b>	Homeless Support Services and Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Chronic Homelessness Individuals Families with Children
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Homeless Continuum of Care
	<b>Description</b>	Housing and support services for the homeless and the near-homeless
	<b>Basis for Relative Priority</b>	Needs Assessment, service providers input, and public input
5	<b>Priority Need Name</b>	Economic Opportunities
	<b>Priority Level</b>	High
	<b>Population</b>	Moderate
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Economic Opportunities
	<b>Description</b>	Grants and other forms of assistance to create or expand for employment opportunities for lower-income individuals
	<b>Basis for Relative Priority</b>	Response to COVID-19 pandemic

6	<b>Priority Need Name</b>	Administration and Planning
	<b>Priority Level</b>	High
	<b>Population</b>	Other
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Program Administration
	<b>Description</b>	Program oversight and coordination, including fair housing services
	<b>Basis for Relative Priority</b>	HUD required.

### Narrative (Optional)

**Impediments to Fair Housing:** The Fair Housing Act of 1968 requires HUD and its program participants to administer housing and urban development programs in a manner that does not discriminate directly or indirectly based on race, color, religion, sex, national origin, age, familial status, or disability. The Fair Housing Act not only prohibited discrimination in housing-related activities and transactions but also requires entities to affirmatively further fair housing. The **Analysis of Impediments (AI) to Fair Housing Choice** is the primary policy document utilized by HUD grantees for this purpose. HUD encourages jurisdictions to consult with one another and initiate metropolitan-wide planning to address impediments to fair housing choice.

During the past Consolidated Plan cycles, the City participated in the development of a multi-jurisdictional AI. For the 2025-2029 AI cycle, Lake Forest has joined with other Orange County cities and the County of Orange to develop a county-wide AI. The 2025-2029 Orange County AI evaluates existing demographic data, past fair housing enforcement activity for each partner community, mortgage lender data, and existing housing and land use public policies. Based on an extensive analysis of this data, and the input of residents, a list of impediments to fair housing choice for the participating jurisdictions have been developed. A corresponding set of action steps to address these barriers have also been prepared. The 2025-2029 Orange County AI is incorporated into the Consolidated Plan in **Appendix G**.

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	NA – CDBG can not be used for this type of activity.
TBRA for Non-Homeless Special Needs	NA – CDBG can not be used for this type of activity.
New Unit Production	CDBG typically cannot be used for this type of activity; however, funds can be used for certain pre-development costs or off-site public improvements. The Needs Assessment and the Housing Market Analysis indicate there is a shortage of housing units affordable to lower-income households; however, due to the size of the City's annual CDBG allocation, it is unlikely funds will be used for this purpose. A substantial amendment to the Consolidated Plan may be necessary if future funding is allocated for this type of activity.
Rehabilitation	Based on the data provided in the Needs Assessment and the Market Analysis, the City's housing stock is generally in good condition; however, there is a need for rehabilitating a portion of the City's older housing stock.
Acquisition, including preservation	According to data provided in the Needs Assessment, 1,945 extremely low-income households experience severe housing cost burden. Based on this data, the City could consider utilizing housing resources to improving the City's older residential properties as a means of expanding housing opportunities for lower income households.

**Table 49 – Influence of Market Conditions**

## **SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

### **Introduction**

Fluctuations in annual CDBG allocations make it difficult to determine anticipated resources for a five-year period; however, based on recent allocations, the City expects to receive approximately \$475,000 annually in CDBG funding, for a five-year total of \$2,375,000. The City uses CDBG funds for housing preservation activities, public improvements, public services, and administrative costs. In addition, approximately \$450,000 of program income will be generated annually from the Housing Rehabilitation Loan Program loan payoffs for an additional \$2,250,000 dedicated for housing activities through the revolving loan fund.

The City will receive \$479,750 in CDBG funds for Fiscal Year 2025-2026. Additional resources for the year include prior year carryover funds totaling \$180,764 and program income in the amount of \$460,598.79 received during the fiscal year generated by the repayment of previously funded housing rehabilitation loans. Both amounts vary from year to year. The City anticipates that the County of Orange will continue to administer the federal rental assistance program in Lake Forest, assisting approximately 200 households per year. The City will continue efforts to leverage CDBG funds with other federal, state, and local funds.

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$479,750	\$127,329	\$180,764	\$787,843.44	\$3,503,887	Annual CDBG allocation, prior year funds, and estimated revolving loan resources

Table 50 - Anticipated Resources

## Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City has identified other resources that may be available to carry out activities that address the goals of the Consolidated Plan:

- OCHA reports that as of April 2025, 203 Lake Forest households receive rental assistance. The City anticipates that OCHA will provide rental assistance to 200 Lake Forest households annually over the five-year Consolidated Plan cycle.
- The City does not have an inclusionary housing program; however, the Housing Element indicates the City will encourage developers to include a minimum of 15% affordable units within their housing projects. As an alternative, developers may pay an in-lieu fee instead of constructing affordable units within their development. The City will negotiate an agreement with a developer to ensure units are built, or the in-lieu fee is collected.

CDBG does not require matching funds.

## If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Lake Forest Housing Authority holds assets formerly held by the Lake Forest Redevelopment Agency. As of April 2025, there are limited assets remaining, no physical property is owned.

## **Discussion**

Funding resources to implement the City's Consolidated Plan are limited. The City anticipates that fluctuations in CDBG funding will continue. HUD has begun to invest additional resources into housing assistance vouchers and certificates, and OCHA has aggressively pursued these new resources. The City will support OCHA's efforts to secure new rental assistance resources. As other resources (e.g., Housing Authority) become available, the City will explore opportunities to expend these funds to support the goals and objectives of the Consolidated Plan.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Orange County Housing Authority	PHA	Public Housing	Jurisdiction
LAKE FOREST	Government	Economic Development Homelessness Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
County of Orange	Government	Economic Development Homelessness Non-homeless special needs Planning	Region
Orange County Continuum of Care	Regional organization	Homelessness	Region

**Table 51 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

The City of Lake Forest works with a wide range of public and community-based organizations to address the social service needs of the community. The institutional structure utilized to administer the CDBG program includes the following:

- The City's Community Development Department serves as the lead agency for coordination of the Five-Year Consolidated Plan, Annual Action Plans, the Consolidated Annual Performance and Evaluation Report (CAPER), compliance review of CDBG-funded projects, and the Orange County AI.
- The City's Public Works Department administers capital improvement (infrastructure and facility) projects, including CDBG-funded activities.

- The City contracts with the Fair Housing Council of Orange County to provide fair housing services.
- The City works in partnership with the Orange County Housing Authority to provide rental assistance to lower-income renters.
- The City works with an extensive network of local social service providers to assist the homeless, households at risk of homelessness, special needs populations, and lower-income residents.
- The City's economic development plan engages the local business community and employers to expand business opportunities in the City, which, in turn, generates employment opportunities for residents at all income levels.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance			
Mortgage Assistance			
Rental Assistance	X	X	
Utilities Assistance	X		
<b>Street Outreach Services</b>			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services		X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse			
Child Care	X		
Education			
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS			
Life Skills	X	X	
Mental Health Counseling			
Transportation			
<b>Other</b>			

**Table 52 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

Service providers are available to assist Lake Forest residents that are at risk of becoming homeless and that are homeless. Based on the idea that it is less expensive and disruptive to keep a household housed in place, the primary focus of the City's homeless strategy is to support the provision of safety net services for community residents. These services include assessment and case management, supplemental food, limited financial assistance for rent or utilities, and reduced cost childcare and medical services. Safety net services enable households at risk of homelessness to redirect limited income toward maintaining their housing.

For those who are homeless, the City has established relationships with housing and service providers that accept referrals from the City. These agencies can address the immediate, interim, and long-term housing needs of the homeless, and provide critical support services.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

As indicated above, the City has developed a strong relationship with local nonprofit agencies that provide a variety of services to residents, including individuals with special needs and the homeless. The main weakness in the City's service delivery system stems from limited financial resources. Additional issues include service and facility gaps in the continuum of care and service overlap.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The Orange County Continuum of Care has designed and implemented a Coordinated Entry System (CES) for people experiencing homelessness or that are at risk of homelessness. The objective of the CES is to more effectively and efficiently help people who are homeless to secure housing and, consequently, achieve a measurable reduction in regional homelessness. As part of this effort, the OC-CoC has adopted a policy of shifting investment away from transitional housing and investing in permanent supportive housing and rapid re-housing. To the extent resources are available, the City supports the efforts of the OC-CoC to use limited resources as effectively as possible.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2025	2029	Affordable Housing	Citywide	Affordable Housing	CDBG: \$2,250,000	Homeowner Housing Rehabilitated: 40 Household Housing Unit
2	Infrastructure and Facility Improvements	2025	2029	Non-Housing Community Development	CDBG TARGET AREAS Citywide	Public Improvements	CDBG: \$625,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7500 Persons Assisted
3	Public Social Services	2025	2029	Non-Homeless Special Needs Low & Moderate-income Households	Citywide	Public Services	CDBG: \$200,000	Public service activities other than Low/Moderate Income Housing Benefit: 8000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Continuum of Care	2025	2029	Homeless	Citywide	Homeless Support Services and Housing	CDBG: \$175,000	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted  Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted  Homelessness Prevention: 250 Persons Assisted
5	Economic Opportunities	2025	2029	Non-Housing Community Development	Citywide	Economic Opportunities	CDBG: \$100,000	Businesses assisted: 50 Businesses Assisted
6	Program Administration	2025	2029	Administration	Citywide	Administration and Planning	CDBG: \$450,000	Other: 450 Other

**Table 53 – Goals Summary**

## Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	Improve or expand the supply of housing affordable to lower-income households

2	<b>Goal Name</b>	Infrastructure and Facility Improvements
	<b>Goal Description</b>	Improve and expand public infrastructure and facilities that benefit low- and moderate-income neighborhoods and residents
3	<b>Goal Name</b>	Public Social Services
	<b>Goal Description</b>	Provide or improve access to public social services for low- and moderate-income persons and persons with special needs
4	<b>Goal Name</b>	Homeless Continuum of Care
	<b>Goal Description</b>	A continuum of housing and supportive services for the homeless and the near-homeless
5	<b>Goal Name</b>	Economic Opportunities
	<b>Goal Description</b>	Grants and other forms of assistance to create or expand for employment opportunities for lower-income individuals
6	<b>Goal Name</b>	Program Administration
	<b>Goal Description</b>	Provide administration and planning activities to carry out actions that address identified needs in the Consolidated Plan, including fair housing services to address local impediments to fair housing

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

The City is not a participating jurisdiction in the HOME program.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

The City of Lake Forest does not own or operate public housing units.

### **Activities to Increase Resident Involvements**

Not applicable

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

N/A

### **Plan to remove the ‘troubled’ designation**

Not applicable

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

Barriers to affordable housing exist in the form of governmental regulations and market factors. Barriers or impediments to affordable housing are caused when there is little incentive to develop affordable housing due to excessive development costs and/or the lack of community commitment. The City has little control over market factors such as the cost and availability of financing. Public policy and community issues potentially affect the cost of all development projects through the design and implementation of land use ordinances, fees, and development standards. While these policies constrain residential development to some extent, they are necessary to support other public policies. Cities also often require developers to provide on-site and off-site improvements necessary to serve their projects. The City of Lake Forest 2021–2029 Housing Element concludes that building codes and development standards in Lake Forest are not substantially different from those of most other cities in Orange County.

Land and construction costs are also key market factors that may serve as a barrier to affordable housing. The City has no influence over materials and labor costs. Land represents one of the most significant costs of new housing. The City’s Housing Element points out that despite generally poor economic conditions, land prices throughout Orange County remain high relative to other regions in California and pose a significant challenge to the development of affordable housing by the private market. Because per unit land cost is directly affected by density, one way to affect this cost is to develop at higher densities that allow the cost to be spread across more units, thus reducing the total price. The City Zoning Code allows development at up to 43 units per acre in the R2 district. Another factor that may serve to address the high cost of developing affordable housing is the availability of government funding to subsidize a portion of the development cost. The elimination of California redevelopment in February 2012 directly impacted a primary funding source of the City of Lake Forest for subsidizing the cost of affordable housing.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

Affordable housing development faces several challenges, including the cost of construction, financing, and development regulations. The 2013–2021 Housing Element notes that the City can encourage and facilitate affordable housing through financial assistance, removal of regulatory constraints, and administrative support. It offers the following actions to promote affordable housing production with limited available funding.

- The City will monitor new neighborhood developments for compliance with development agreements that include an Affordable Housing Implementation Plan.
- The City will collaborate with affordable housing developers to identify potential sites, write letters of support to help secure governmental and private-sector funding, and offer technical assistance related to the application of State density bonus provisions.
- Work with developers on a case-by-case basis to provide State-mandated regulatory concessions and incentives to assist with the development of affordable and senior housing. State-mandated

regulatory concessions and incentives could include but are not limited to, density bonuses, parking reductions, fee reductions or deferral, expedited permit processing, and modified or waived development standards.

- If available, provide financial subsidies to help reduce the cost of development in exchange for the reservation of units for lower-income households.

## **SP-60 Homelessness Strategy – 91.215(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City collaborates with nonprofit partners to conduct homeless outreach in the community. Service providers will evaluate the service and housing needs of individuals to facilitate the transition to permanent housing and independent living. Local service providers tie into the regional Coordinated Entry System established by the OC-CoC, which determines the vulnerability of homeless individuals and prioritizes access to housing and services for those most at risk. This need-assessment system is designed to “facilitate exits from homelessness to stable housing in the most rapid manner given available resources.” The City has a Community outreach Specialist that works closely with the Orange County Sheriff’s Department Homeless Outreach Team. The former helps coordinate services with the Orange County Health Care Agency, homeless advocacy groups, and other nonprofits to offer resources and services to the homeless and chronic homeless.

### **Addressing the emergency and transitional housing needs of homeless persons**

As Table 39 indicates, there are 35 transitional shelter beds located in the City. These shelter beds are the result of past City allocations of CDBG and redevelopment funds to nonprofits to assist with the acquisition of housing units. These units continue to provide much needed interim housing opportunities for homeless families with children. The City will continue to support local nonprofit agencies that provide emergency and transitional housing for the region’s homeless. The City supports agencies such as Family Assistance Ministries (FAM), Families Forward, and South County Outreach. FAM offers a continuum of housing, including emergency and transitional housing for families with children. Families Forward and South County Outreach offer interim housing programs for homeless families that have been stabilized and are transitioning into independent living. Additionally, the City will participate in regional efforts to explore options and opportunities to develop a South SPA year-round emergency shelter and homeless resources center.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

According to current HUD directives, the OC-CoC has established a coordinated entry system whereby a homeless individual or family seeking shelter and services is directed to a streamlined system that facilitates access to appropriate housing and services. The system screens applicants for eligibility for services, such as homelessness prevention, emergency shelter, rapid rehousing, permanent supportive housing, and other interventions. The needs and strengths of each household are assessed to determine

which interventions will be most effective and appropriate, while also prioritizing people for assistance based on the severity of their needs. Homeless service providers presently supported by the City will be critical players in housing and servicing the City's homeless population via the coordinated entry system.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

As indicated previously, the City homeless strategy is rooted in the proposition that it is less expensive and disruptive for a household to remain sheltered in their existing home than to be rehoused. To this end, the City uses public resources, such as CDBG, to support agencies that provide a variety of safety net services that may help prevent households from becoming homeless. Examples of safety net services include food banks, rent/utility assistance, and subsidized childcare services. The City will also participate in regional homeless planning efforts, including the OC-CoC's Discharge Plan, which will aim to prevent individuals that are leaving institutions such as jails, prisons, and hospitals from becoming homeless.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 (Title X) changed the federal approach to addressing LBP by increasing the emphasis on the prevention of childhood lead poisoning through housing-based strategies.

Lake Forest has implemented its lead-based paint reduction strategy as part of the City's Housing Rehabilitation programs. All application packets for the City's Housing Rehabilitation programs include a notice to educate residents about the health dangers of lead and encourages screening of children for elevated blood lead levels. Additionally, before using federal funds to improve a property, a unit must be screened for lead-based paint. If lead-based paint is identified, the hazards must be addressed per federal requirements. The use of lead-based paint is prohibited in newly constructed units.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

The City will continue to act as necessary to reduce lead-based paint hazards per HUD regulations. As outlined above, housing units improved via the City's housing rehabilitation programs are tested for lead-based paint, and the hazard is removed as necessary to comply with federal regulations.

### **How are the actions listed above integrated into housing policies and procedures?**

The City will comply with lead-based requirements as part of the administration of the CDBG program. The City's Housing Rehabilitation programs' policies and procedures aim to reduce the risk of lead-based paint poisoning, especially among young children.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

According to the U.S. Census Bureau, 7.4% of the City's population is living below the poverty level. The Census Bureau also reports that 7.4% of Lake Forest residents age 65 and older live in poverty, as are 9.3% of children age 18 years and younger.

The City has identified several activities and services it can implement to help combat poverty:

- Support rental assistance programs provided by OCHA for very low-income renters, especially for senior and disabled households, and households with children.
- Continue to support homeless prevention services for individuals presently housed but are at risk of losing their residence.
- Assist those already homeless in need of emergency shelter, transitional housing, rapid rehousing, or permanent supportive housing.
- Support public services that provide a social safety net for lower-income individuals.
- Continue to implement housing rehabilitation programs for lower-income homeowners, especially senior households.
- Assist agencies that provide employment training for low- and moderate-income residents.
- Support programs that aid the anti-poverty strategy, such as CalWorks and the Orange County Workforce Investment Board.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The activities delineated above are tied directly to the goals and objectives of the City's Consolidated Plan. Safety net services can provide households living in poverty with extra resources that may allow them to maintain or improve their overall financial situation. Furthermore, expanding or preserving the City's supply of affordable housing will provide new housing opportunities to lower-income households at affordable prices, which is consistent with the housing goals of the Consolidated Plan.

## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City of Lake Forest Community Development Department has the responsibility for overall program monitoring and compliance. Staff monitors all CDBG funded agencies and City departments to ensure compliance with applicable regulations and to ensure timely implementation of all activities. The program staff conducts an on-site monitoring visit of each subrecipient biennially. The City also ensures compliance with all Federal and City contracting regulations, including procurement, Federal Labor Standards, equal opportunity (Minority Business Enterprise and Women Business Enterprise), and Section 3. While construction projects are underway, on-site compliance interviews with the workers are conducted. Additionally, the program Staff ensures compliance with the U.S. Office of Management and Budget (OMB) requirements for conducting single audits, as well as compliance with HUD reporting requirements for accomplishment in the Integrated Disbursement and Information System (IDIS).

The City of Lake Forest will continue to reach out to small businesses and minority and women-owned businesses when conducting procurements for supplies, equipment, construction, and services for CDBG-funded activities.

## **Expected Resources**

### **AP-15 Expected Resources – 91.220(c)(1,2)**

#### **Introduction**

Fluctuations in annual CDBG allocations make it difficult to determine anticipated resources for a five-year period; however, based on recent allocations, the City expects to receive approximately \$475,000 annually in CDBG funding, for a five-year total of \$2,375,000. The City uses CDBG funds for housing preservation activities, public improvements, public services, and administrative costs. In addition, approximately \$450,000 of program income will be generated annually from the Housing Rehabilitation Loan Program loan payoffs for an additional \$2,250,000 dedicated for housing activities through the revolving loan fund.

The City will receive \$479,750 in CDBG funds for Fiscal Year 2025-2026. Additional resources for the year include prior year carryover funds totaling \$180,764 and program income in the amount of \$127,329 received during the fiscal year generated by the repayment of previously funded housing rehabilitation loans. Both amounts vary from year to year. The City anticipates that the County of Orange will continue to administer the federal rental assistance program in Lake Forest, assisting approximately 200 households per year. The City will continue efforts to leverage CDBG funds

with other federal, state, and local funds.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$479,750.00	\$127,329.00	180,764.44	\$787,843.44	\$3,503,887.00	Annual CDBG allocation, prior year funds, and estimated revolving loan resources

**Table 54 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The City has identified other resources that may be available to carry out activities that address the goals of the Consolidated Plan:

- OCHA reports that as of April 2025, 203 Lake Forest households receive rental assistance. The City anticipates that OCHA will provide rental assistance to 200 Lake Forest households annually over the five-year Consolidated Plan cycle.
- The City does not have an inclusionary housing program; however, the Housing Element indicates the City will encourage developers to include a minimum of 15% affordable units within their housing projects. As an alternative, developers may pay an in-lieu fee instead of constructing affordable units within their development. The City will negotiate an agreement with a developer to ensure units are built, or the in-lieu fee is collected.

CDBG does not require matching funds.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City of Lake Forest Housing Authority holds assets formerly held by the Lake Forest Redevelopment Agency. As of April 2025, there are limited assets remaining, no physical property is owned.

**Discussion**

Funding resources to implement the City's Consolidated Plan are limited. The City anticipates that fluctuations in CDBG funding will continue. HUD has begun to invest additional resources into housing assistance vouchers and certificates, and OCHA has aggressively pursued these new resources. The City will support OCHA's efforts to secure new rental assistance resources. As other resources (e.g., Housing Authority) become available, the City will explore opportunities to expend these funds to support the goals and objectives of the Consolidated Plan.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2025	2029	Affordable Housing	Citywide	Affordable Housing	CDBG: \$450,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
2	Public Social Services	2025	2029	Non-Homeless Special Needs Low & Moderate-income Households	Citywide	Public Services	CDBG: \$71,900	Public service activities other than Low/Moderate Income Housing Benefit: 2,729 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homeless Continuum of Care	2025	2029	Homeless	Citywide	Homeless Support Services and Housing	CDBG: \$49,200	Public service activities other than Low/Moderate Income Housing Benefit: 2,400 Persons Assisted  Homelessness Prevention: 97 Persons Assisted
4	Economic Opportunities	2025	2029	Non-Housing Community Development	Citywide	Economic Opportunities	CDBG: \$50,000	Businesses assisted: 10 Businesses Assisted
5	Program Administration	2025	2029	Administration	Citywide	Administration and Planning	CDBG: \$95,950	Other: 34 Other
6	Community Facilities and Infrastructure	2025	2029	Community Facilities and Infrastructure	Target Areas	Community Facilities and Infrastructure	CDBG: \$230,000	Other: 8,500 Other

**Table 55 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	Loans and grants to improve owner-occupied housing or expand the supply of housing affordable to lower-income households
2	<b>Goal Name</b>	Public Social Services
	<b>Goal Description</b>	Provide or improve access to public social services for low- and moderate-income persons and persons with special needs
3	<b>Goal Name</b>	Homeless Continuum of Care
	<b>Goal Description</b>	A continuum of supportive and housing services for the homeless and households at risk of homelessness
4	<b>Goal Name</b>	Economic Opportunities
	<b>Goal Description</b>	Grants and other forms of assistance to create or expand for employment opportunities for lower-income individuals
5	<b>Goal Name</b>	Program Administration
	<b>Goal Description</b>	CDBG program oversight and coordination including fair housing services
6	<b>Goal Name</b>	Community Facilities and Infrastructure
	<b>Goal Description</b>	Improve/upgrade public infrastructure & facilities

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The activities to be undertaken during FY 2025-2026 are summarized below. All activities identified are expected to be completed by June 30, 2026.

#### Projects

#	Project Name
1	CDBG Administration
2	Housing Rehabilitation Loans
3	Paint Program Grants
4	Age Well Senior Services
5	Camino Health Center
6	Fair Housing Council of OC
7	Families Forward
8	Family Assistance Ministry
9	South County Outreach
10	ADA Ramp Improvements Phase 15
11	Boys & Girls Club of Laguna Beach
12	Upwards

**Table 56 – Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

The City recognizes that special needs populations (i.e., seniors, disabled, and households with extremely low-income) are more likely to become homeless because they have limited income or other issues that require supportive housing or services; therefore, the City considers supportive services a high priority.

The City anticipates that the greatest obstacle to meeting the underserved needs of these special needs populations will be a lack of financial resources for both supportive services and housing. A common need reported by service providers is affordable housing. Increasing rents, and reductions to the Housing Choice Voucher Program and other housing programs, can impact the City's ability to support affordable housing opportunities for extremely low- and very low-income households.

### **AP-38 Project Summary**

#### **Project Summary Information**

<b>1</b>	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Administration and Planning
	<b>Funding</b>	CDBG: \$88,450
	<b>Description</b>	CDBG program oversight and coordination
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	100 Civic Center, Lake Forest CA (City Hall)
	<b>Planned Activities</b>	CDBG program oversight and coordination, including public service grant management, preparation of reports, and IDIS management

<b>2</b>	<b>Project Name</b>	Housing Rehabilitation Loans
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$209,025
	<b>Description</b>	Housing rehabilitation loans for owner-occupied housing units
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 low- and moderate-income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Loans to rehabilitate owner-occupied housing units funded with entitlement funds and program income received during the year
<b>3</b>	<b>Project Name</b>	Paint Program Grants
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$125,000
	<b>Description</b>	Grants to assist homeowners in painting the exterior of their home
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 low- and moderate-income homeowners
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Grants to homeowners to paint the exterior of their home

4	<b>Project Name</b>	Age Well Senior Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Social Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$5,000
	<b>Description</b>	Meals on Wheels
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 Seniors and frail elderly
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Case management and in-home support services for home-bound seniors and frail elderly
5	<b>Project Name</b>	Camino Health Center
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Social Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Low-cost medical services
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2,400 Individuals
	<b>Location Description</b>	22481 Aspen St., Suite A, Lake Forest CA
	<b>Planned Activities</b>	Reduced cost medical services for low- and moderate-income persons

<b>6</b>	<b>Project Name</b>	Fair Housing Council of OC
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Social Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$7,500
	<b>Description</b>	Program Administration
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	34 households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Fair housing outreach, education, and enforcement services to address impediments to fair housing.
<b>7</b>	<b>Project Name</b>	Families Forward
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeless Continuum of Care
	<b>Needs Addressed</b>	Homeless Support Services and Housing
	<b>Funding</b>	CDBG: \$15,962
	<b>Description</b>	Support services for at-risk and homeless families with children
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	27 Individuals At-Risk Homeless
	<b>Location Description</b>	Citywide

	<b>Planned Activities</b>	Case management for homeless families with children and families with children that are at risk of becoming homeless
<b>8</b>	<b>Project Name</b>	Family Assistance Ministry
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeless Continuum of Care
	<b>Needs Addressed</b>	Homeless Support Services and Housing
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Housing and services for households at risk of homelessness or that are homeless
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	50 lower-income individuals
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Case management, supportive services and rent/utility assistance for lower-income residents at risk of eviction or termination of utility services.
<b>9</b>	<b>Project Name</b>	South County Outreach
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$19,000
	<b>Description</b>	Homelessness prevention assistance
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	20 At-Risk Homeless individuals

	<b>Location Description</b>	7 Whatney St. B, Irvine, CA
	<b>Planned Activities</b>	Foodbank services, including case management - services also include emergency rent and utility assistance to prevent eviction or termination of services
<b>10</b>	<b>Project Name</b>	ADA Ramp Improvements Phase 15
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Public Improvements
	<b>Funding</b>	CDBG: \$230,000
	<b>Description</b>	ADA Ramp Improvements Phase 15 will include curb cuts and ramp installation in the eligible areas.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 8,500 disabled residents.
	<b>Location Description</b>	Throughout the city at street intersections, as necessitated by conditions and current federal standards.
	<b>Planned Activities</b>	Implement improvements to comply with current ADA regulations.
<b>11</b>	<b>Project Name</b>	Boys & Girls Club of Laguna Beach
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Social Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$12,000
	<b>Description</b>	Childcare services
	<b>Target Date</b>	6/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	After School childcare for 32 low-income families.
	<b>Location Description</b>	Mountain View, 24551 Raymond Way, Lake Forest, CA 92630
	<b>Planned Activities</b>	After school childcare.
<b>12</b>	<b>Project Name</b>	Upwards
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Micro-Enterprise Technical Assistance and Job Training for Childcare Service Providers.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 Businesses to be served
	<b>Location Description</b>	Various
	<b>Planned Activities</b>	Micro-Enterprise Technical Assistance and Job Training for Childcare Service Providers.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

For FY 2025-2026, CDBG funds will support activities on a citywide basis, that is, for households that are income-eligible or eligible due to a unique characteristic (e.g., adults with disabilities and seniors) regardless of where they live in Lake Forest.

#### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
CDBG TARGET AREAS	28
Citywide	72

**Table 57 - Geographic Distribution**

#### **Rationale for the priorities for allocating investments geographically**

The City does not allocate CDBG funds on a geographic basis; instead, funding is allocated in a manner that best meets the needs of lower income households regardless of where they reside in the City. The City prioritizes the use of its CDBG funding for the preservation of housing that is affordable to lower-income households (via rehabilitation), and that helps prevent homelessness or assist those already homeless. These activities are carried out on a citywide basis.

CDBG-funded infrastructure and facility improvements are usually located within Low- and Moderate-Income areas as identified by HUD (see Figure 1 LMA Map). Some infrastructure/facility improvement projects may be undertaken in areas outside of Low- and Moderate-Income areas. Such projects are typically limited to those that address ADA regulations.

#### **Discussion**

CDBG funds will fund programs that serve lower-income Lake Forest residents regardless of where they live. For FY 2025-2026, CDBG funds will benefit residents on a citywide basis, with the exception of the ADA Ramp Improvement project that will benefit primarily low- and moderate-income residential areas.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

Although the Consolidated Plan and Action Plan focus on affordable housing needs of the community, the City's only HUD funding source is CDBG. HUD regulations prohibit the use of CDBG for the construction of new housing; however, the City will allocate funds to preserve existing housing that is affordable to lower-income homeowners.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

**Table 58 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

**Table 59 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

The 2025-2026 Action Plan allocates CDBG public to a local agency that will provide transitional housing to an estimated 11 individual. The City's CDBG-funded affordable housing strategy is to maintain the affordable housing stock through housing rehabilitation programs and supporting rental assistance programs like the Housing Choice Voucher (administered by the OCHA). The City anticipates eight homeowners will participate in the City's housing rehabilitation program, and 200 Lake Forest renter households will receive rental assistance during FY 2025-2026.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Lake Forest does not own or operate public housing.

### **Actions planned during the next year to address the needs to public housing**

Not applicable

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Not applicable

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable

### **Discussion**

The City of Lake Forest does not own or operate public housing.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City recognizes the importance of assisting the homeless and near-homeless with a continuum of care approach that not only addresses a homeless person's immediate shelter needs, but also provides access to transitional and permanent housing, support services, and employment opportunities to break the cycle of homelessness.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City collaborates and relies on nonprofit partners to reach out to homeless persons (especially unsheltered persons). The City will allocate CDBG funds to four agencies that will provide services for homeless individuals. Each agency has an outreach component used to engage and assess clients

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

In past years, the City used CDBG funds to assist nonprofits in acquiring eight condominium units located in the community to provide transitional housing. For FY 2025-2026, Families Forward's "Housing Program" is recommended for CDBG funding. This program offers interim (i.e., transitional) housing for up to 25 individuals (i.e., families with children). The City did not receive any requests for emergency shelter programs.

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The Orange County Continuum of Care coordinates a system that incorporates several evidence-based practices, including a Housing First approach that involves moving persons directly from the streets into permanent housing accompanied by home-based supportive services. This approach has been effective with chronically homeless persons and families.

In past years Lake Forest used CDBG and local redevelopment funding to expand permanent housing opportunities for the formerly homeless. In 2015, the City's Housing Authority (former redevelopment agency) sold a four-unit apartment to Families Forward. These units provide permanent housing

opportunities for lower-income households, including formerly homeless families.

In addition to Rapid Rehousing, the OC-CoC will address the housing needs of homeless households with unique situations. The Family Redirection Program aims to keep homeless families with children off the streets by prioritizing shelter and housing resources for families. HUD has also significantly increased the number of rental assistance vouchers for homeless Veterans (i.e., Veterans Affairs Supportive Housing or VASH vouchers). In addition to receiving rental assistance, veterans with a history of severe mental health illness, substance use disorder, or physical disabilities receive case management and appropriate support services from the Department of Veterans Affairs. Currently, 486 VASH vouchers are in place throughout Orange County (13 in Lake Forest). For unaccompanied youth, there are several residential/supportive services programs available in Orange County designed specifically for youths. Services offered include crisis intervention, drug abuse counseling, and case management.

The City will not allocate FY 2025-2026 CDBG funds for rapid rehousing or permanent supportive housing.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

For FY 2025-2026, the City will allocate CDBG funds to Family Assistance Ministry and South County Outreach for an array of services to assist the near-homeless and those already homeless. These agencies operate food bank programs, which provide an entry point into the regional CoC. Program applicants undergo an assessment by case managers who determine if additional services are needed and who will make appropriate referrals. CDBG resources are used by these agencies to assist households who are at risk of eviction or the termination of utilities due to financial hardships, especially in the post-COVID-19 environment. The City will also continue to participate in regional homeless planning efforts, including the OC CoC's Discharge Plan, which aims to prevent individuals from leaving institutions such as jails and hospitals, from becoming homeless.

## **Discussion**

The programs identified above to address the needs of homeless persons indicate that serving the homeless is a complex issue requiring a network of service providers. The City will allocate CDBG resources to support a network of agencies that will address the needs of the community's homeless and those at risk of becoming homeless.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The Strategic Plan provides detailed information regarding barriers to affordable housing and actions to overcome these barriers. The efforts to address these barriers during FY 2025-2026 are summarized below.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Affordable housing development faces several challenges, including the cost of construction, financing, and development regulations. The 2013–2021 Housing Element notes that the City can encourage and facilitate affordable housing through financial assistance, removal of regulatory constraints, and administrative support. It offers the following actions to promote affordable housing production with limited available funding.

- The City will monitor new neighborhood developments for compliance with development agreements that include an Affordable Housing Implementation Plan.
- The City will collaborate with affordable housing developers to identify potential sites, write letters of support to help secure governmental and private-sector funding, and offer technical assistance related to the application of State density bonus provisions.
- Work with developers on a case-by-case basis to provide State-mandated regulatory concessions and incentives to assist with the development of affordable and senior housing. State-mandated regulatory concessions and incentives could include but are not limited to, density bonuses, parking reductions, fee reductions or deferral, expedited permit processing, and modified or waived development standards.
- If available, provide financial subsidies to help reduce the cost of development in exchange for the reservation of units for lower-income households.

### **Discussion:**

The Strategic Plan includes an extensive narrative regarding barriers to affordable housing and actions the City can take to mitigate identified obstacles to the development of affordable housing. As outlined above, the City provides an expedited development review process for affordable housing projects to help reduce holding costs and the overall cost of development. The City has little control over market forces such as the cost of land, building materials, and labor. If resources are available, the City may provide gap financing to help reduce overall development costs as an incentive to develop affordable housing. There are no growth limit initiatives in Lake Forest.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

There are several constraints to meeting the needs of low-income residents; the primary obstacle is a lack of funding to address all needs adequately. Demand for services has forced many nonprofits to reduce services at a time when governmental entities are also decreasing resources. In response to the level of need, the City has maintained its commitment to utilize and leverage resources efficiently and effectively to meet priority community needs.

### **Actions planned to address obstacles to meeting underserved needs**

The City recognizes that special needs populations face challenges due to low income, the unique conditions that they face, and that they are more likely to become homeless as a result of these factors. Special needs populations often require unique housing and supportive services. The City considers supportive services and housing for special needs populations as a high priority. In FY 2025-2026, the City will fund public service agencies that assist underserved populations such as the homeless, seniors, the disabled, and low-income families with children.

### **Actions planned to foster and maintain affordable housing**

The City's strategies related to CDBG-funded affordable housing efforts are focused on maintaining the housing stock through its housing rehabilitation programs, supporting rental assistance programs like the Housing Choice Voucher, and helping to ensure individuals have access to housing free of discrimination due to race, gender, disability, and other personal or household characteristics.

### **Actions planned to reduce lead-based paint hazards**

As previously discussed, the Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 changed the federal strategy to addressing LBP by increasing the emphasis on the prevention of childhood lead poisoning through housing-based approaches. For example, lead-based paint hazard reduction as an eligible activity in the City's housing rehabilitation programs.

All application packets for the City's housing rehabilitation programs include a notice to educate residents about the health dangers of lead and encourage screening of children for elevated blood-lead levels. Additionally, before the use of federal funds, housing units are screened for lead-based paint. Housing units identified with lead-based paint hazards are treated, so the lead-based paint is abated per current federal requirements. The use of lead-based paint is prohibited in newly constructed units.

### **Actions planned to reduce the number of poverty-level families**

The City will leverage limited CDBG funds to address the needs of poverty-level families by partnering with

nonprofit agencies that primarily focus services to these households. Specifically, the City will fund programs that provide safety net services such as food banks, limited financial assistance to prevent eviction, low-cost medical and dental care, and fair housing education/enforcement services.

### **Actions planned to develop institutional structure**

The City of Lake Forest will continue efforts to eliminate institutional gaps and enhance coordination of programs with all segments of the community. For example, the City will partner with nonprofit entities to deliver public services. City departments will continue to work together to evaluate programs and projects that may be funded in whole or in part with CDBG funds that address priority needs. The City will assist OCHA by participating in the Cities Advisory Committee – a quarterly meeting of cities and OCHA to discuss issues related to federal rental housing assistance and general housing issues. As a member of the OC-CoC Community Forum, the City will continue to provide information to the regional CoC as it prepares the County’s annual Continuum of Care Homeless Assistance grant application. The City will also continue to participate in the development of the County’s Ten-Year Plan to end chronic homelessness and the regional discharge plan.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The City will continue to participate in regional coordination of services by participating in the Cities Advisory Committee - the quarterly meeting of cities and OCHA to discuss issues related to federal rental housing assistance and as a member of the OC-CoC Community Forum. On an annual basis, the City meets with service providers to discuss service needs and ways to improve service to residents. Another example of enhanced coordination is the preparation of the county-wide Analysis of Impediments to Fair Housing. The City participated in the development of this document, which required significant jurisdictional coordination.

### **Discussion:**

As previously outlined, HUD regulations require that the City prepare an Analysis of Impediments to Fair Housing choice (AI) every five years. In addition to identifying impediments, the AI includes a strategy to overcome barriers and action steps to implement on an annual basis. The City reports AI accomplishments in the annual year-end report. The City of Lake Forest joined other Orange County jurisdictions to fund the preparation of a county-wide AI. The AI evaluates existing demographic data, past fair housing enforcement activity for each partner community, mortgage lender data, and existing housing and land use public policies. Based on an analysis of this data, plus the input of residents, a list of impediments to fair housing choice for the County has been developed. A corresponding set of action steps to address these barriers has also been prepared. A summary of the of 2025-2029 Orange County AI is incorporated into the Consolidated Plan as Appendix G – the entire AI is available for review on the City’s website. The specific action steps the City will take during FY 2025-2026 to address impediments to fair housing can also be found in Appendix G.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

#### Introduction:

The program-specific requirements that apply to the City are those for the CDBG program.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.50%

The City will meet the 70% low- and moderate-income Overall Benefit requirement for the use of CDBG funds over each of the five Consolidated Plan program years, and specifically for current Program Year 2025. Approximately 19.5% of available CDBG funds (minus administration), may be used for Urgent Need activities; however, no such need has been determined at this time.

1. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A the City does not receive HOME funds.

## Appendix - Alternate/Local Data Sources

<b>1</b>	<b>Data Source Name</b> Vacant Units
	<b>List the name of the organization or individual who originated the data set.</b> City of Lake Forest
	<b>Provide a brief summary of the data set.</b> Information regarding vacant properties
	<b>What was the purpose for developing this data set?</b> Provide information regarding vacant properties
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Data limited to City of Lake Forest
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2021-2029 Housing Element
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete.
	<b>2</b>
<b>Data Source Name</b> OC Continuum of Care	
<b>List the name of the organization or individual who originated the data set.</b> OC-211	
<b>Provide a brief summary of the data set.</b> 2024 Orange County homeless Point-In-Time Survey	
<b>What was the purpose for developing this data set?</b> Homeless survey	
<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Countywide with some local data	
<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> January 2024	
<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete	

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**Appendix A**  
**SF-424**

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

05/15/2025

4. Applicant Identifier:

B-25-MC-06-0584

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

CITY OF LAKE FOREST

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

33-0495169

\* c. UEI:

PT77Q9PNBJ55

**d. Address:**

\* Street1:

100 CIVIC CENTER DRIVE

Street2:

\* City:

LAKE FOREST

County/Parish:

ORANGE

\* State:

CALIFORNIA

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

92630-0000

**e. Organizational Unit:**

Department Name:

CITY MANAGER

Division Name:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name:

KEITH

Middle Name:

D.

\* Last Name:

NEVES

Suffix:

Title:

ASSISTANT CITY MANAGER

Organizational Affiliation:

\* Telephone Number:

949-461-3431

Fax Number:

\* Email:

kneves@lakeforestca.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township GovernmentNN

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

N/A

### \* 10. Name of Federal Agency:

HOUSING AND URBAN DEVELOPMENT

### 11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

COMMUNITY DEVELOPMENT BLOCK GRANT

### \* 12. Funding Opportunity Number:

N/A

\* Title:

N/A

### 13. Competition Identification Number:

N/A

Title:

N/A

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

CDBG funds will be used to support housing rehabilitation, low/mod public services, public improvements & program admin within the City of Lake Forest, CA.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

CA-045

\* b. Program/Project

CA-045

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

07/01/2025

\* b. End Date:

06/30/2026

**18. Estimated Funding (\$):**

\* a. Federal

\$ 479,750.00

\* b. Applicant

\* c. State

\* d. Local

\* e. Other

\$ 180,764.00

\* f. Program Income

\$ 460,598.00

\* g. TOTAL

\$1,121,112.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

Ms.

\* First Name:

DEBRA

Middle Name:

\* Last Name:

ROSE

Suffix:

\* Title:

CITY MANAGER

\* Telephone Number:

949-461-3410

Fax Number:

949-641-3577

\* Email:

drose@lakeforestca.gov

\* Signature of Authorized Representative:

\* Date Signed:

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## **Appendix B**

### **Certifications**

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

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Signature of Authorized Official

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Date

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Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2025 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## **OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

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Signature of Authorized Official

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Date

---

Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

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Signature of Authorized Official

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Date

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Title

## **Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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## **Appendix C**

### **Citizen Participation Plan**



**Draft**

**City of Lake Forest, CA**

**Citizen Participation Plan**

Approved – May 6, 2025

## **City of Lake Forest Citizen Participation Plan**

### **I. INTRODUCTION**

The City of Lake Forest is a recipient of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). The overarching goal of the CDBG program is "to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities," principally for low- and moderate-income persons. To receive CDBG funds, the City is required to prepare specific plans and reports. The Consolidated Plan (Con Plan) outlines a multi-year strategy to address priority housing and community needs. This strategic plan identifies programs and projects that may be implemented throughout the Con Plan cycle to address priority needs. In developing the Con Plan, HUD requires local government grantees to "extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations...."<sup>1</sup> Furthermore, "grantees that receive annual block grants for community development, affordable housing, and homelessness must - as a condition of receiving the grant funds - engage stakeholders and the public regarding the community's needs in these areas."<sup>2</sup>

The Con Plan requirements for citizen participation and consultation for local governments are found in Subpart B of 24 CFR Part 91.100 and 24 CFR Part 91.105. These regulations outline the elements that constitute a Citizen Participation Plan (CPP), which include the following:

- The description of the public participation process, including public hearings and public comment periods
- The process to ensure opportunities for the involvement of affected persons and other concerned citizens in the planning process
- Transparency of the planning process and freedom of access to the draft plans
- A guide for the public's submission of comments and the standards for the grantee's response
- Procedures for continuity of participation throughout all stages of the Plan's development

The CPP should facilitate citizen participation throughout the Con Plan's development, the substantial amendment process, and the annual performance report. CPP regulations also apply to the preparation, adoption, and amendment of the Analysis of Impediments (AI) to Fair Housing. The AI is the City's analysis and action plan to affirmatively further fair housing in the

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<sup>1</sup> See 24 Code of Federal Regulations 91.1.

<sup>2</sup> "The eCon Planning Suite: Citizen Participation and Consultation Toolkit Version: July 2014," U.S. Department of Housing and Urban Development, page 3.

community. CPP regulations require the City to actively encourage widespread citizen participation, with a particular emphasis on efforts to encourage participation from the following populations:

- Low- and moderate-income persons
- Residents of slums, blighted areas, and predominately low- and moderate-income areas
- Non-English speaking persons
- Persons with disabilities
- Public housing residents and other low-income residents of targeted revitalization areas

It is the intent of the City of Lake Forest to provide for and encourage citizen participation throughout the process of implementing its Con Plan, associated documents, and the AI. The City will comply with applicable regulations through public meetings, public outreach, public hearings, technical assistance, complaint procedures, and coordination with outside jurisdictions, agencies, and interested parties.

## **II. BACKGROUND**

HUD established the Consolidated Plan requirement in 1995 to replace separate application and reporting requirements for four core programs:

- Community Development Block Grant (CDBG)
- The Home Investment Partnerships Program (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities for Persons With AIDS (HOPWA)

The City of Lake Forest incorporated on December 20, 1991. Upon incorporation, the City became eligible to participate in the CDBG program and has been managing the program since 1994. Lake Forest receives approximately \$475,000 in CDBG funding annually from HUD. As a recipient of CDBG funds, the City must prepare a Consolidated Plan every three to five years. On an annual basis, the City prepares an expenditure plan that identifies the specific activities it will undertake with its annual CDBG allocation to meet the priority needs identified in the Consolidated Plan. This document is known as the Annual Action Plan (AAP). At the conclusion of each fiscal year, the City prepares and submits (to HUD) the Consolidated Annual Performance and Evaluation Report (CAPER). To facilitate the preparation of the CPP, the City may reference the AAP and CAPER as "associated documents."

The Fair Housing Act of 1968 requires HUD and its program participants to administer housing and urban development programs in a manner that does not discriminate directly or indirectly based on race, color, religion, sex, national origin, age, familial status, or disability. The Fair

Housing Act not only prohibited discrimination in housing-related activities and transactions but also requires entities to affirmatively further fair housing. The Analysis of Impediments (AI) to Fair Housing Choice is the primary policy document utilized by HUD grantees for this purpose. HUD encourages jurisdictions to consult with one another and initiate metropolitan-wide planning to address impediments to fair housing choice.

As required by HUD, the City will develop the Con Plan through a "bottom-up" approach. The planning process will include units of local government, outside agencies, community organizations, the private sector, and, most important, Lake Forest residents. The Citizen Participation Plan provides the guidelines and processes the City will use to engage the community and comply with applicable regulations.

### **III. CONSOLIDATED PLAN/ANNUAL ACTION PLAN – PUBLIC PARTICIPATION**

Outlined below is the process the City will follow to encourage public participation in the preparation of the Con Plan and the AAP.

#### **Public Meetings and Hearings**

The City may initiate the Con Plan/AAP process by hosting a public workshop. The purpose of this workshop is to inform and educate potential sub-recipients and the public about the requirements, projected funding amounts, and limitations of the CDBG Program. The workshop will also provide an opportunity to solicit public input regarding the needs of the community. City staff will also be available to provide technical assistance for preparing applications for CDBG funding.

Annually, the City will conduct at least one public meeting and one public hearing related to the public review and adoption of the Con Plan/AAP. The City will hold a public hearing(s) and any additional public meeting(s) at locations and at times convenient to the public, especially for persons most affected by program resources. To the extent possible, location equipment will be available to accommodate persons with physical disabilities. Unless otherwise noticed, all public hearing(s)/meeting(s) will be conducted at City Hall, City Council Chambers, located at 100 Civic Center, Lake Forest, CA. Spanish translation is available at public hearings/meetings if requested in advance. It is the intention of the City of Lake Forest to comply with the Americans with Disabilities Act (ADA). If an attendee or participant at a public meeting needs special assistance beyond what is typically provided, the City of Lake Forest will attempt to accommodate disabilities reasonably. Note that the City Clerk must be notified at least 48 hours before the public hearing/meeting.

Local disasters or other emergencies may require the City to utilize alternative methods to conduct public meetings and/or hearings. Alternative methods, such as electronic conferencing, must ensure that members of the public can actively participate in meetings.

Consistent with HUD regulations, the City will conduct a 30-day public review period during which time a draft of the Con Plan/AAP will be available for public review. The City will publish a notice announcing the comment period and the public hearing in a newspaper of general circulation (detailed below). As required, the City will incorporate public comments (and responses if applicable) into the final Con Plan/AAP.

### **Public Notification**

Not less than ten (10) calendar days before convening a public hearing, the City will publish a notice in a newspaper of general circulation and post the notice at other locations as determined by the City Clerk. The notice will announce the date, time, location, and purpose of the hearing. The City will also utilize other methods to communicate relevant information regarding citizen participation (e.g., public hearings, comment periods). These methods may include, but are not limited to, electronic newsletters, community service announcements on local cable TV, social media, and the City's website. Copies of the Con Plan/AAP will be made available to the public at various locations such as City Hall, local libraries, or community centers.

### **Amendments and Substantial Amendments**

During the Con Plan/AAP cycle, it may become necessary to modify the plan. The City will utilize the following criteria and procedures to amend the Consolidated Plan and Annual Action Plan.

#### **CONSOLIDATED PLAN AMENDMENTS**

The Con Plan establishes priority housing and community development goals, and each goal has related action items. **A substantial amendment** results when the City adds a priority goal category previously not listed in the adopted Con Plan.

**Example:** In the third year of the Con Plan cycle, the City determines it will use CDBG funds to provide micro-enterprise loans to local start-up businesses; however, the adopted Con Plan does not list Economic Development as a priority goal. The addition of Economic Development goals and objectives will constitute a substantial amendment.

The Con Plan includes a list of CDBG-funded activities that have units of measure, such as the number of homes rehabilitated, or persons assisted. These production projections are considered estimates, and changes are not considered as substantial. Similarly, deletion or modification of programs described in the Con Plan will not necessarily be regarded as a significant amendment.

## ANNUAL ACTION PLAN AMENDMENTS

An **amendment** to the Annual Action Plan results whenever the City makes one of the following decisions:

- A change in its allocation priorities
- A change in the method of distribution of funds
- A change in the purpose, scope, location, or beneficiaries of an activity

An amendment to the Annual Action Plan is a **substantial amendment** whenever the City:

- Allocates or reallocates CDBG funds to an activity previously not identified in an approved AAP
- Changes to the purpose, scope, location, or beneficiaries of an activity identified in the approved AAP
- The reallocation of CDBG funds to an eligible activity that exceeds 45% of the City's current annual CDBG allocation

**Example:** The City's Public Works Department notifies CDBG program staff that the street pavement rehabilitation project slated for the current fiscal year will be delayed one year. Cancellation of this project does not constitute a substantial amendment.

**Example:** The City reallocates funds not used for street pavement improvements to assist a non-profit in purchasing a condominium. The reallocation equals 55% of the City's current year CDBG allocation. This action does constitute a substantial amendment.

Other actions that constitute an amendment, but not a substantial amendment include:

1. A canceled activity
2. A budget increase of a new or existing activity that does not exceed the substantial amendment threshold
3. An additional activity that is on the AAP's back-up list approved by the City Council during public/budget hearing(s)
4. Non-performance or eligibility issues requiring activity termination
5. A project deletion or funding reduction due to facility closure or bankruptcy
6. An agency disqualification, a determination of ineligibility to receive funding, or to produce sufficient eligible billings per the provisions of the agreement.

Modifications to a project after completion of the final engineering work will not constitute a substantial change if the purpose, scope, location, or beneficiaries of the project remain mostly the same. Therefore, elements can be added to or deleted from a project, provided that the change in the project cost does not otherwise trigger a substantial amendment.

The approval of a substantial amendment will require the City to comply with the notification and public hearing process outlined in this Section.

Upon approval of the substantial amendment by the City Council, the program staff will transmit the substantial amendment to the Los Angeles HUD Field Office via HUD's Integrated Disbursement and Information System (IDIS). The program staff will update activities that are modified by a non-substantial amendment in IDIS and will notify HUD of the change in the CAPER.

#### **IV. Consolidated ANNUAL PERFORMANCE AND EVALUATION REPORT**

The Consolidated Annual Performance and Evaluation Report (CAPER) details the annual accomplishments of the Consolidated Plan and the Annual Action Plan. The CAPER is due to HUD within 90 days after the close of a program year. The following procedures will ensure that the public will have a chance to review and comment on the CAPER:

- As detailed in Section III, the City will publish a notice announcing the 15-day public comment period for the draft CAPER in a newspaper of general circulation, and post a notice as delineated in Section III
- After the 15-day review period, the City Council will consider the adoption of the CAPER at a publicly noticed City Council meeting
- Program staff will incorporate relevant public comments received during the comment period and City Council meeting into the final CAPER
- Upon approval of the CAPER by the City Council, program staff will submit the CAPER to the HUD-Los Angeles Field Office via IDIS

#### **V. CITIZEN PARTICIPATION PLAN (CPP)**

The adoption of the CPP mirrors the process for adoption of the Consolidated Plan/Annual Action Plan delineated in Section III. Implementation of the following public comment and review procedures will ensure that all citizens have a chance to participate in the development of the CPP.

- As detailed in Section III, the City will publish a notice announcing the 30-day public comment period for the draft CPP. The City will publish a notice in a newspaper of general circulation and post a notice as delineated in Section III

- Following the 30-day review period, the City Council will consider the adoption of the CPP at a designated and publicly noticed City Council meeting
- Program staff will incorporate relevant public comments received during the comment period and City Council meeting into the final CPP
- Upon approval of the CPP by the City Council, the program staff will finalize the CPP. The CPP will be available for public review upon request

#### **CITIZEN PARTICIPATION PLAN AMENDMENTS**

The City will amend its approved CPP whenever a change in the existing public participation process is necessary. The amendment will follow the same process as the adoption of the CPP outlined above.

#### **VI. ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING**

As an entitlement jurisdiction receiving CDBG funds, Lake Forest must certify it will affirmatively further fair housing and undertake fair housing planning in conjunction with its Consolidated Plan/Annual Action Plan. Fair housing planning consists of the following:

- Preparation of an analysis of impediments to fair housing choice
- Actions to mitigate the effects of identified impediments
- Maintenance of records to support the affirmatively furthering fair housing certification

The Analysis of Impediments (AI) to Fair Housing Choice entails a comprehensive review of a state's, region's, or jurisdiction's laws, regulations, and administrative policies, procedures, and practices as they relate to compliance with fair housing laws. The AI involves an assessment of how these laws, regulations, policies, and procedures affect the location, availability, and accessibility of housing, and how conditions, both private and public, affect fair housing choice.

Once the City completes the AI, it must report on its implementation by summarizing the impediments identified in the analysis and describing the actions taken to overcome the effects of identified barriers in its CAPER. Each jurisdiction is required to maintain an AI and to update the AI as necessary. Jurisdictions may also identify the actions it plans to take to overcome the effects of impediments to fair housing choice during the coming year in the Annual Action Plan. HUD requires that the CPP delineate the process the City will utilize to adopt, amend, and to report accomplishments.

The public review and City Council adoption procedures for the AI will mirror that of the Con Plan as described above. The City will report annual accomplishments related to the AI in the annual CAPER. Amendments to the AI will also mirror the process described above in Section III.

## **ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING AMENDMENTS**

Changes or updates to the AI that do not substantially modify the analysis, findings, or recommendations of the approved AI are considered minor. A substantial amendment to the AI consists of a material change in circumstances that affects the information on which the AI is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AI no longer reflect actual circumstances. Examples include:

- Presidentially declared disasters in the program participant's area that are of such a nature as to significantly impact the steps a program participant may need to take to affirmatively further fair housing
- Significant demographic changes
- New significant contributing factors in the participant's jurisdiction
- Civil rights findings, determinations, settlements, or court orders
- A HUD written notification that specifies a material change that requires a revision of the AI.

When a revision is required as a result of a material change, such revision will be submitted to HUD within 12 months of the onset of the material change, or at such later date as HUD may provide. Where the material change is the result of a Presidentially-declared disaster, such time will be automatically extended to the date that is two years after the date upon which the disaster declaration is made. HUD may extend such deadline, upon request, for a good cause.

The public review and City Council adoption procedures for an AI substantial amendment will mirror that of the Con Plan as described above.

## **VII. RESPONSE TO COMMENTS**

Lake Forest will consider the views of residents, public agencies, and other interested parties in preparing its final Consolidated Plan, associated documents, and the AI, and incorporate a summary of such comments in the final documents. The summary of public comments will also include a written explanation of comments not accepted and the reasons why these comments were not accepted. All written comments will be responded to, in writing, within 15 days from the receipt of comments where practical.

## **VIII. PUBLIC ACCESS TO INFORMATION AND RECORDS**

The City will provide members of the public with reasonable access to the Con Plan, associated documents, and AI. Information and records will be available at the City Hall / Community Development Department at the following address, Monday through Friday, during the regular business hours, excluding legal holidays.

City of Lake Forest City Hall  
100 Civic Center  
Lake Forest, California 92630

Copies of the Con Plan, associated documents, and AI will be made available for review upon request. Documents will also be posted on the City's website and at local library branches. A reasonable number of free copies may be available upon request. All records related to the City's Con Plan, associated documents, and AI will be maintained and available for a minimum period of five years after completion of a Program Year. The City reserves the right to charge document copying fees.

## **IX. COMPLAINTS AND GRIEVANCES**

The City recognizes that, despite making significant outreach and education efforts, there may be complaints or grievances filed regarding the operation of its CDBG program. Written complaints must be submitted to the following address:

City of Lake Forest  
Director of Community Development  
100 Civic Center  
Lake Forest, California 92630

When practical, a written response will be transmitted by the City within fifteen working days. If more time is required, the City shall notify the correspondent in writing, with fifteen working days, of the time needed to provide an answer. Only written complaints and grievances will be responded to in writing. All related correspondence will be kept on file at Lake Forest City Hall.

## **X. TECHNICAL ASSISTANCE**

CDBG program staff will provide information and technical assistance upon request to all prospective sub-recipients and other interested parties. Staff will conduct informational workshops and program-related meetings when requested. CDBG program staff will also provide information regarding program requirements and community issues upon request.

The Community Development Department will maintain a library of relevant community development publications for review by interested residents.

## **XI. BILINGUAL OPPORTUNITIES**

Wherever a significant number of low- and moderate-income persons or residents speak and read a primary language other than English, the City will endeavor to provide notices of public hearings and meetings, and summaries of basic CDBG program information in such language. If necessary, the City will also provide a translator at City-sponsored, Con Plan-related public

meetings or hearings. If a resident speaks a language other than English or Spanish as a principal language, with enough notice, an effort will be made to find an interpreter.

## **XII. HANDICAPPED ACCESSIBILITY**

The City will ensure that physical barriers do not preclude the attendance or participation of disabled individuals at meetings and hearings convened pursuant to this CPP.

## **XIII. ANTI-DISPLACEMENT/RELOCATION**

As required by HUD regulations, the City will make available for public review and comment its Anti-displacement Plan, which delineates the specific actions to be undertaken to minimize the displacement of persons from their homes as a result of any activities carried out with CDBG funds.

If applicable, the City will post a notice at the project site that is subject to federal relocation law. The notice will meet the requirements of the Uniform Relocation Act and sections of the Housing and Community Development Act of 1974, as amended. The public notice will invite comments and indicate that Lake Forest's Anti-Displacement Plan can be accessed.

## **XIV. AUTHORITY OF THE CITY**

The City may exercise the liberty to expand upon the provisions herein. This CPP and its mandates may not be construed to restrict the responsibility or authority of the City of Lake Forest for the development and execution of the Con Plan and associated documents.

## **XV. CITIZEN PARTICIPATION PLAN ADOPTION**

The Lake Forest City Council will adopt the Citizen Participation Plan presented herein at a public hearing, after considering public comments, on May 6, 2025 and every five years thereafter, in conjunction with the five- year Consolidated Plan.

## **XVI. CITIZEN PARTICIPATION PLAN AMENDMENTS FOR DISASTERS**

In the event of a local, state, or national disaster, it may be necessary to rapidly deploy existing or new funding resources allocated to the City by HUD. In such emergency situations, the Citizen Participation process may be streamlined to reduce delays in accessing grant funds pursuant to notices, waivers, award letters, or other HUD directives. Rapid deployment of HUD resources may require a substantial amendment of the Consolidated Plan and/or Annual Action Plan(s).

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**Appendix D**  
**Citizen Participation/Public Comments**

**No Comments have been received.**

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**Appendix E**  
**Outreach Materials / Survey Results**



# 2025–2030 Consolidated Plan Community Survey

The City of Lake Forest is developing its Consolidated Plan, a federally required roadmap for allocating U.S. Department of Housing and Urban Development (HUD) funds, including Community Development Block Grants (CDBG). Over the next five years, these grants will support infrastructure, community facilities, housing improvements, homelessness services, and public services to benefit low-income residents and neighborhoods. Your input is vital to shaping these priorities—take our survey to help create a healthy, safe, and thriving community.

**Responses are anonymous, and the survey is open until January 31, 2025**

Scan to Take  
the Survey!



Or Visit: <https://publicinput.com/h35740>

# 2025-2030 Consolidated Plan - Community Survey

## Project Engagement

VIEWS

518

PARTICIPANTS

228

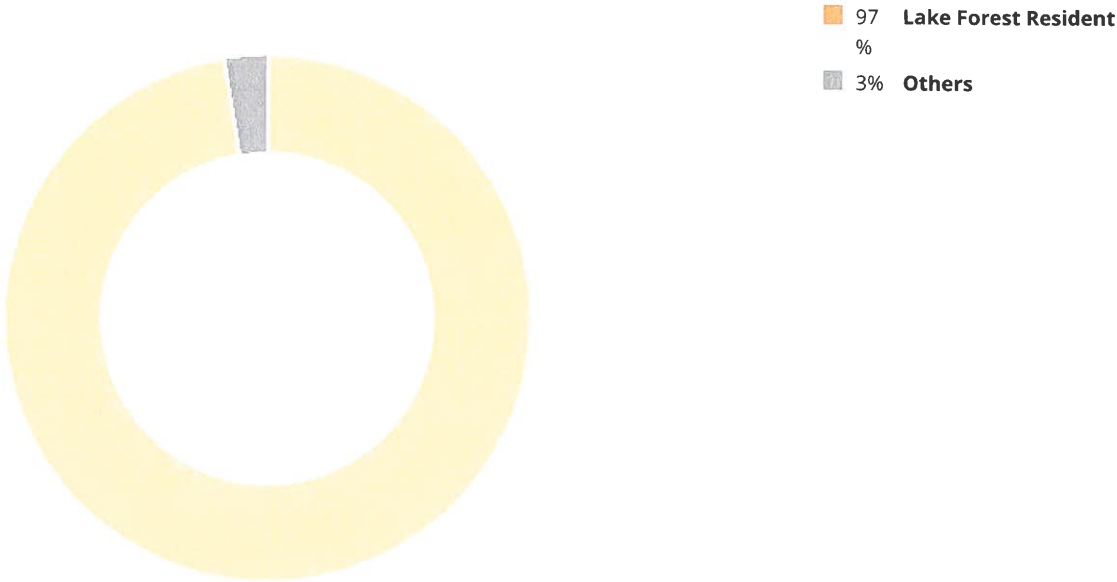
RESPONSES

9,309

COMMENTS

3

Which of the following best describes you?



223 respondents

What is your age?



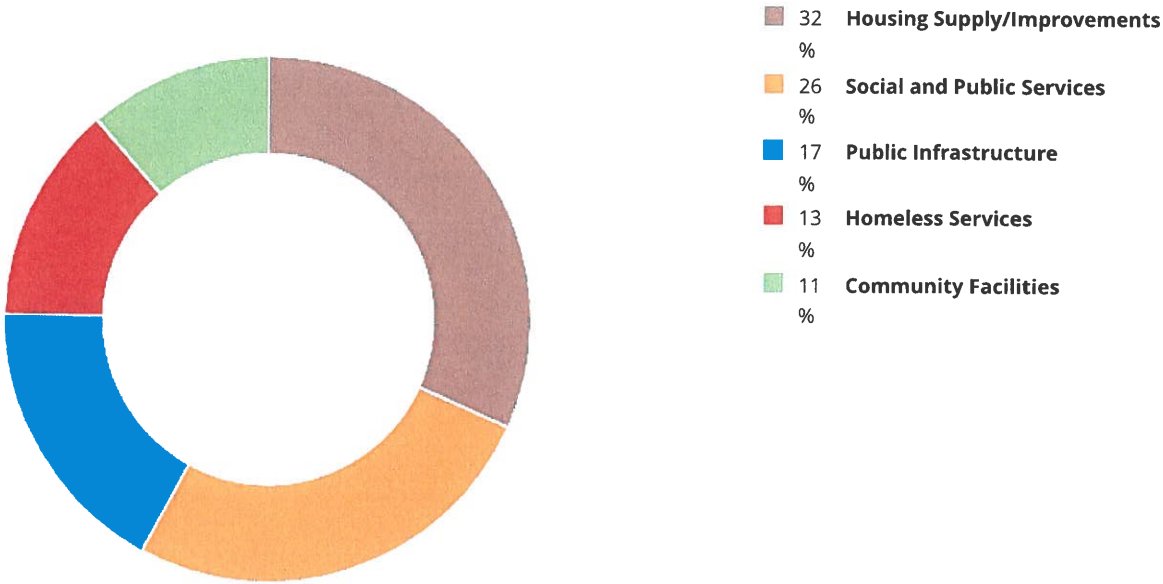
223 Respondents

Please provide your home zip code.



224 Respondents

In your opinion, what is the greatest need in your community that would benefit particularly low-income persons?



202 respondents

## HOUSING SUPPLY/IMPROVEMENTS

Please rate the level of need for each of the below services in the

City of Lake Forest using the scale below:

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need.

Housing for Large Families (5 or more person households)	23%	19%	23%	20%	15%
	1	2	3	4	5
Housing for Small Families (1- or 2-person households)	16%	16%	24%	24%	21%
	1	2	3	4	5
Housing for Seniors (Age 62 and older)	11%	9%	25%	26%	29%
	1	2	3	4	5
Housing for Persons with Special Needs (HIV/AIDS, Substance Abuse, Disabled)	15%	16%	23%	27%	19%
	1	2	3	4	5
Homebuyer Assistance	17%	14%	24%	20%	26%
	1	2	3	4	5
Rehab: Owner-Occupied Residential	24%	16%	29%	21%	10%
	1	2	3	4	5
Rehab: Renter-Occupied Residential	30%	17%	30%	18%	5%
	1	2	3	4	5
Rehab: Energy Efficiency Improvements	23%	16%	23%	24%	14%
	1	2	3	4	5
Acquisition (for Affordable Housing)	25%	13%	21%	15%	26%
	1	2	3	4	5

180 responses

## SOCIAL AND PUBLIC SERVICES

Please rate the level of need for each of the below services in the

City of Lake Forest using the scale below:

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need.

Senior Services	6%	12%	31%	30%	21%
	1	2	3	4	5
Youth Services	7%	9%	27%	38%	18%
	1	2	3	4	5
Childcare Services	11%	8%	21%	33%	28%
	1	2	3	4	5
Services for the Disabled	7%	11%	34%	30%	19%
	1	2	3	4	5
Services for Victims of Domestic Violence	10%	20%	25%	24%	20%
	1	2	3	4	5
Services for Abused & Neglected Children	10%	13%	26%	24%	28%
	1	2	3	4	5
Substance Abuse Services	12%	15%	27%	24%	22%
	1	2	3	4	5
Healthcare Services	8%	9%	25%	28%	30%
	1	2	3	4	5
Screening for Lead Poisoning	24%	29%	28%	7%	11%
	1	2	3	4	5
Mental Health Services	5%	9%	24%	28%	33%
	1	2	3	4	5
Transportation Services	6%	12%	26%	30%	26%
	1	2	3	4	5
Graffiti Removal	13%	23%	27%	16%	21%
	1	2	3	4	5
Employment Training	12%	20%	36%	20%	12%

	1	2	3	4	5
Food Banks	10%	19%	25%	28%	17%
	1	2	3	4	5

199 responses

## HOMELESS SERVICES

Please rate the level of need for each of the below services in the

City of Lake Forest using the scale below:

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need.

Homeless Outreach Services	8%	16%	25%	28%	24%
	1	2	3	4	5
Emergency Shelter (1 to 90 Days)	15%	13%	24%	26%	22%
	1	2	3	4	5
Transitional Housing (Over 90 Days)	21%	15%	19%	21%	24%
	1	2	3	4	5
Permanent Housing	22%	12%	19%	16%	31%
	1	2	3	4	5
Homeless Prevention (One-Time Rent/Utilities Assistance)	16%	13%	20%	24%	27%
	1	2	3	4	5
Food & Clothing	13%	15%	26%	27%	19%
	1	2	3	4	5
Mental & Behavioral Health	9%	8%	20%	26%	37%
	1	2	3	4	5
Substance Abuse Programs	12%	13%	25%	22%	28%
	1	2	3	4	5
Storage Facilities	30%	20%	27%	12%	10%
	1	2	3	4	5

186 responses

## PUBLIC INFRASTRUCTURE

Please rate the level of need for each of the below services in the

City of Lake Forest using the scale below:

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need.

Residential Street Improvements	4%	14%	33%	22%	27%
	1	2	3	4	5
Sidewalks/Gutters	5%	16%	33%	22%	25%
	1	2	3	4	5
Street Lighting	5%	14%	29%	21%	31%
	1	2	3	4	5
Flood Prevention/Drainage	5%	12%	27%	22%	34%
	1	2	3	4	5
Sewer System Improvements	4%	15%	35%	21%	25%
	1	2	3	4	5
Water System Improvements	5%	10%	33%	23%	29%
	1	2	3	4	5
Tree Planting	9%	15%	32%	25%	20%
	1	2	3	4	5
ADA-Compliant Public Improvements	13%	18%	32%	18%	19%
	1	2	3	4	5

172 responses

## COMMUNITY FACILITIES

Please rate the level of need for each of the below services in the

City of Lake Forest using the scale below:

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need.

Senior Centers	10%	16%	29%	27%	18%
	1	2	3	4	5
Youth Centers	9%	13%	27%	32%	19%
	1	2	3	4	5
Centers for the Disabled	10%	9%	35%	31%	15%
	1	2	3	4	5
Health Facilities	12%	8%	29%	28%	23%
	1	2	3	4	5
Parks and Recreation Facilities	9%	13%	24%	24%	31%
	1	2	3	4	5
Neighborhood or Community Centers	7%	13%	28%	25%	27%
	1	2	3	4	5
Rehab: Publicly Owned Buildings	19%	24%	33%	15%	8%
	1	2	3	4	5

174 responses

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**Appendix F**  
**Proof of Publications / Public Notices**

1920 Main St. Suite 225  
Irvine, California 92614  
(714) 796-2209  
legals@inlandnewspapers.com

LAKE FOREST, CITY OF  
100 CIVIC CENTER DR  
LAKE FOREST, California 92630

Account Number:	5190701
Ad Order Number:	0011704492
Customer's Reference/PO Number:	
Publication:	Saddleback Valley News
Publication Dates:	12/05/2024
Total Amount:	\$273.10
Payment Amount:	\$0.00
Amount Due:	\$273.10
Notice ID:	LeXpVSfPAUmlxWhulYZd
Invoice Text:	<p>CITY OF LAKE FOREST FISCAL YEAR 2025-2026 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM NOTICE OF FUNDING AVAILABILITY / REQUEST FOR APPLICATIONS The City of Lake Forest anticipates receiving approximately \$492,246 (estimated 5% decrease in funds from the prior year) in CDBG funds from the federal Department of Housing and Urban Development (HUD) for Fiscal Year 2025-2026. The primary objective of the CDBG program is "the development of viable urban communities by providing decent housing, a suitable environment and expanding economic opportunities principally for persons of low- and moderate-income." The City of Lake Forest is free to select from various eligible activities established by HUD to use CDBG funds, including housing rehabilitation, infrastructure improvement, and social services. Funding for social service programs is limited to a maximum of fifteen percent (15%) of the City's total CDBG allocation for a given year. Based on the estimated grant, \$73,836 may be available for public service grants. REQUEST FOR APPLICATIONS Currently, the City is accepting applications from interested, existing tax-exempt California nonprofit organizations presently providing or planning to provide CDBG-eligible services to City of Lake Forest residents during Fiscal Year 2025-2026 (July 1, 2025, through June 30, 2026). Interested/qualified organizations are invited to apply for service program funding. The CDBG application and additional information regarding the CDBG program as administered by the City of Lake Forest is available for download from the City's website (<a href="http://www.lakeforestca.gov/854/Community-Development-Block-Grant">www.lakeforestca.gov/854/Community-Development-Block-Grant</a>) or by contacting Adrian Grijalva, Economic Development/Housing Manager at</p>

Saddleback Valley News  
1920 Main St. Suite 225  
Irvine, California 92614  
(714) 796-2209

100 CIVIC CENTER DR, ATTN: CITY CLERK  
LAKE FOREST, California 92630

**AFFIDAVIT OF PUBLICATION**  
**STATE OF CALIFORNIA**

**County of Orange County**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the Saddleback Valley News, a newspaper that has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange County, State of California, on December 7, 1976, Case No. A-86742 in and for the City of Irvine, County of Orange County, State of California; that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

**12/05/2024**

I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct:

Executed at Anaheim, Orange County, California, on  
Date: Dec 5, 2024.

  
\_\_\_\_\_  
Signature

**CITY OF LAKE FOREST FISCAL YEAR 2025-2026**

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM**

**NOTICE OF FUNDING AVAILABILITY / REQUEST FOR APPLICATIONS**

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Submit applications to Adrian Grillova, Economic Development/Housing Manager, at 100 Civic Center Drive, Lake Forest, CA, 92630.

**All applications are due to the City by Thursday, January 23, 2025, at 12 PM.**

**Saddleback Valley News**  
**Published: 12/5/24**

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COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM  
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**PUBLIC NOTICE**  
**CITY OF LAKE FOREST**  
**Community Development Block Grant Program**  
**FY 2025-2029 Five Year Consolidated Plan and FY 2025-2026 Annual Action Plan**

**30-DAY PUBLIC REVIEW AND COMMENT PERIOD**  
**AND NOTICE OF PUBLIC HEARING**

Notice is hereby given that the City of Lake Forest seeks public input pursuant to the Community Development Block Grant (CDBG) program FY 2025-2029 Consolidated Plan and Annual Action Plan for Fiscal Year (FY) 2025-2026. The CDBG program's primary objective is to develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities for persons of low- and moderate-income (those earning 80 percent or less of Orange County's median income). This funding is provided by the U.S. Department of Housing and Urban Development (HUD). The scope of eligible activities established by HUD ranges from public works improvements to housing rehabilitation and social service programs.

**FY 2025-2029 Five-Year Consolidated Plan and FY 2025-2026 Annual Action Plan**

The Consolidated Plan is a five-year strategic plan that identifies priority community needs and projects/programs that may be implemented to meet these needs. The Annual Action Plan outlines the City's proposed use of CDBG funds for a twelve-month period. To date, HUD has not announced 2025 grant allocations; however, for planning purposes, the City anticipates receiving \$479,750 in CDBG funds for FY 2025-2026 (represents a 5% reduction from the prior year allocation). Program income generated by the repayment of prior funded housing rehabilitation loans and prior year uncommitted funds will also be available to undertake eligible housing activities, which is estimated at \$180,764.44 (carryover) and \$460,598.79 (program income). Based on the City's estimated FY 2025-2026 CDBG allocation, the following activities are proposed:

<b>Program Name</b>	<b>Program Description</b>	<b>Proposed CDBG Funding</b>
Public Facility Improvements/Housing	Examples: Assisted Pedestrian Signal Pushbuttons and housing rehabilitation loans and grants	\$311,838 (entitlement)  \$180,764.44 (carryover)  \$460,598.79 (program income)
Public Services	Examples: Food distribution, health care services, senior services, and homeless services	\$71,962
CDBG Program Administration	Program coordination, management, staffing, monitoring, and reporting; fair housing education and enforcement services	\$95,950

Due to the delay in approving the federal 2025 budget, the City will increase or decrease proposed CDBG funding for activities by a percentage based on the final 2025 CDBG grant.

**COMMENT PERIOD**

A copy of the draft FY 2025-2029 Five-Year Consolidated Plan and FY 2025-2026 Annual Action Plan is available for review on the City website: <https://www.lakeforestca.gov/en/departments/economic-development/housing/community-development-block-grant>. The plan is also available for public review at Lake Forest City Hall, 100 Civic Center Drive, Lake Forest, CA.

Written public comments will be accepted from 03/25/25 through 04/24/25. Written comments should be submitted no later than 5:00 PM May 6, 2025, to:

City of Lake Forest  
Attn: Adrian Grijalva

100 Civic Center  
Lake Forest, CA 92630

The City will respond to all public comments received in writing.

### **CITY COUNCIL PUBLIC HEARING**

All interested persons are invited to the public hearing to discuss the draft FY 2025-2029 Five-Year Consolidated Plan and FY 2025-2026 Annual Action Plan.

**DATE:** Tuesday, May 6, 2025  
**TIME:** 6:30 PM or soon thereafter  
**LOCATION:** Lake Forest City Hall Council Chambers  
100 Civic Center, Lake Forest, CA, 92630

**Agenda on the Internet:** Meeting agendas are available on the City website at <https://www.lakeforestca.gov/en/agendas>. Specific meeting agendas are accessible on the Friday before a City Council meeting. City Council meetings are also live-streamed on the City website.

**Agenda Document Review:** A full Agenda, including all backup information, is available at City Hall, 100 Civic Center Drive, Lake Forest, California, the Friday before a meeting.

**Agenda Description:** The Agenda descriptions are intended to notify members of the public of a general summary of items of business to be transacted or discussed. The listed Recommended Action represents staff's recommendation. The City Council may take any action it deems appropriate on the agenda item and is not limited in any way by the recommended action.

**PUBLIC COMMENT PRIOR TO THE MEETING:** Members of the public may submit email comments to [council@lakeforestca.gov](mailto:council@lakeforestca.gov). Email comments will be uploaded to the agenda packet and made part of the official public record of the meeting and will not be read at the meeting. To ensure staff reviews all comments prior to the City Council meeting, please submit email comments no later than 5:00 PM the day of the meeting.

**PUBLIC COMMENT:** Members of the public may provide comments in-person at the meeting. Those wishing to provide comments in-person at the meeting will be asked to submit a request to speak to the City Clerk. Members of the public may submit email comments to [council@lakeforestca.gov](mailto:council@lakeforestca.gov). Email comments will be uploaded to the agenda packet and made part of the official public record of the meeting and will not be read at the meeting. To ensure staff reviews all comments prior to the City Council meeting, please submit email comments no later than 5:00 p.m. the day of the meeting.

Any petition for judicial review of a decision of the Lake Forest City Council is controlled by the statute of limitations provisions set forth in Sections 2.50.010 and 2.50.020 of the Lake Forest Municipal Code ("LFMC") and Sections 1094.5 and 1094.6 of the California Code of Civil Procedure. Any action or proceeding to attack, review, set aside, or void any decision of the Lake Forest City Council is controlled by Section 2.50.010 and Section 2.50.020 of the LFMC.

Any such action or proceeding that seeks judicial review of, attacks, or seeks to set aside or void any decision of the Lake Forest City Council shall be limited to those issues raised at the hearing described in this notice or in written correspondence delivered to the City Clerk, at, or prior to, the public hearing described in this notice, and must be commenced within the time limits specified in Chapter 2.50 of the LFMC.

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**Appendix G**  
**Analysis of Impediments to Fair Housing Choice**  
**(AI)**

## M. Lake Forest

<p><b>Issue: Disparities in Access to Opportunities</b></p> <p>While residents overall have relatively good access to opportunities, compared to the region, residents living below the FPL in the city generally have less access to opportunities than the rest of the population.</p>	
<p><b>Contributing Factors:</b></p> <ol style="list-style-type: none"> <li>1. Lack of opportunity due to high housing costs.</li> <li>2. Lack of access to public transportation.</li> </ol>	
<p><b>Actions:</b></p> <p>Increase housing supply in high opportunity areas through the following actions:</p> <ol style="list-style-type: none"> <li>1. Implement Program 1: Land Use Policy, Entitlements, and Development Capacity (Shortfall Program), to rezone sites to accommodate new residential and mixed-use development at densities consistent with the City's General Plan (adopted in 2020) to meet the City's RHNA at all income levels.</li> <li>2. Implement Program 2: Monitor Residential Capacity (No Net Loss), to ensure that replacement sites identified to continue to accommodate the City's remaining RHNA throughout the planning period are consistent with the City's duty to affirmatively further fair housing.</li> <li>3. On an ongoing basis, actively recruit residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies as positions are made available due to the regular appointment process or vacancies.</li> </ol>	<p><b>Timeframe:</b></p> <p>Between 2021-2029, the City's goal is to promote the development of 1,648 new units (including 303 lower income units and 167 moderate income units, consistent with the City's Quantified Objectives for 2021-2029) with 75% of the new units located in areas of moderate or high opportunity; rezone 158 acres to allow for the development of up to 2,965 multifamily units, with 75% of the units located in areas of moderate or high opportunity; and increase the number of applications from residents living in low or moderate resource areas for open Board and Commission positions by 20%.</p>
<p>Preserve existing affordable housing opportunities and prevent displacement through the following actions:</p> <ol style="list-style-type: none"> <li>4. Implement Program 4: Replacement of Affordable Units, to ensure that affordable units that are removed from the City's housing stock are replaced in accordance with state law.</li> <li>5. Implement Program 5: Facilitate Affordable and Special Needs Housing Construction, to encourage the development of housing units to serve the needs of larger households, including large extremely low-income households.</li> </ol>	<p>Between 2021-2029, the City's goal will be to maintain at least 202 affordable housing units in the City; increase the proportion of new multifamily units that are 3 or more bedrooms by 10%; promote the develop of 70 new extremely low income housing units (consistent with the City's Quantified Objectives for 2021-</p>

<p>6. Implement Program 23: Economic Displacement Risk Analysis, to proactively identify potential issues related to economic displacement as a result of new development.</p>	<p>2029); and commit \$70,500 to implement programs and improvements serving the Southwest Lake Forest neighborhood with a focus on programs and improvements that protect existing residents from displacement.</p>
<p>Increase access to opportunities for individuals with disabilities through the following actions:</p> <p>7. Implement Program 1: Land Use Policy, Entitlements, and Development Capacity (Shortfall Program), to rezone sites adjacent to transit corridors and activity centers to allow for higher density residential development, suitable for affordable and special needs housing, including new opportunities for individuals with disabilities.</p> <p>8. Implement Program 5: Facilitate Affordable and Special Needs Housing Construction, whereby the City will proactively reach out to developers of housing for special needs populations to share details about special needs groups in Lake Forest and promote the development of housing for special needs groups in areas of moderate and high levels of opportunity.</p> <p>9. Implement Program 6: Monitor and Implement Changes in federal and state Housing, Planning, and Zoning Laws to proactively identify changes in federal and/or state regulations required to be implemented at the local level to improve access to opportunity for individuals with disabilities.</p>	<p>Between 2021-2029, the City's goal will be to rezone 158 acres to accommodate the development of up to 2,965 new units with a focus to promote the development of units affordable to lower income households in areas of moderate or high opportunity; increase the number of local individuals with disabilities taking transit by 10% by encouraging the development of new housing for individuals with disabilities to be located close to transit routes; increase the proportion of new multifamily units that are 3 or more bedrooms by 10%; and resolve 100% of reasonable accommodation requests consistent with the requirements of state law.</p>