County of Orange

Housing Element

2021 - 2029

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COUNTY OF ORANGE
HOUSING ELEMENT
2021-2029

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Glossary

The following terms are used throughout this document and include common geographical terms as well as general and planning terms:

Term or Abbreviation	Definition
Above moderate-income households	Households with an income that is 120% or more of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $153,351 or more for a four-person household, as calculated by HCD for 2023 (this is more than 120% of the $127,800 AMI for Orange County).
Accessory Dwelling Unit or "ADU"	A dwelling unit providing complete independent living facilities for one or more persons that is located on a parcel with another primary, single-family dwelling or multifamily use defined by Government Code section 65852.2, as may be amended. Must include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling's location. An accessory dwelling unit may be within the same structure as the primary unit, in an attached structure, or in a separate structure on the same parcel.
AFFH	Affirmatively Furthering Fair Housing – a legal requirement that federal agencies and federal grantees further the purposes of the federal Fair Housing Act. This term means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."
Affordable housing unit	A residential dwelling unit which shall be reserved for rent or sale to eligible households based upon housing cost and household income levels at extremely low-, very low-, low-, or moderate income as established by the California Department of Housing and Community Development (HCD) or U.S. Department of Housing and Urban Development (HUD).
AI	Orange County Analysis of Impediments to Fair Housing, 2020
AMI	Area Median Income – the median income for the County of Orange as a whole, unless otherwise limited in the document to Unincorporated Census Designated Places (CDPs) and other Unincorporated areas. The methodology for determining the AMI may be different between governmental entities so the AMI may be reported differently among tables.
Assisted Housing	Generally, refers to multifamily rental housing, but may sometimes include single-family owner-occupied units, whose construction, financing, sales price, or rent have been subsidized by federal, state, or local funding programs benefitting very low-, low-, or moderate-income households.
CDBG	Community Development Block Grants – A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitled communities, which allots money to cities and counties for housing rehabilitation and community development, including public facility and economic development.
Census Designated Place or "CDP"	Statistical equivalents of incorporated places representing Unincorporated communities that do not have a legally defined boundary that are designated by the U.S. Census Bureau. For purposes of this 6th Cycle Housing Element, the Unincorporated CDPs relevant to the County include Coto de Caza, Ladera Ranch, Las Flores, Midway City, Modjeska, North Tustin, Rancho Mission Viejo, Rossmoor, Silverado, Trabuco Canyon, and Williams CDPs. While these CDPs

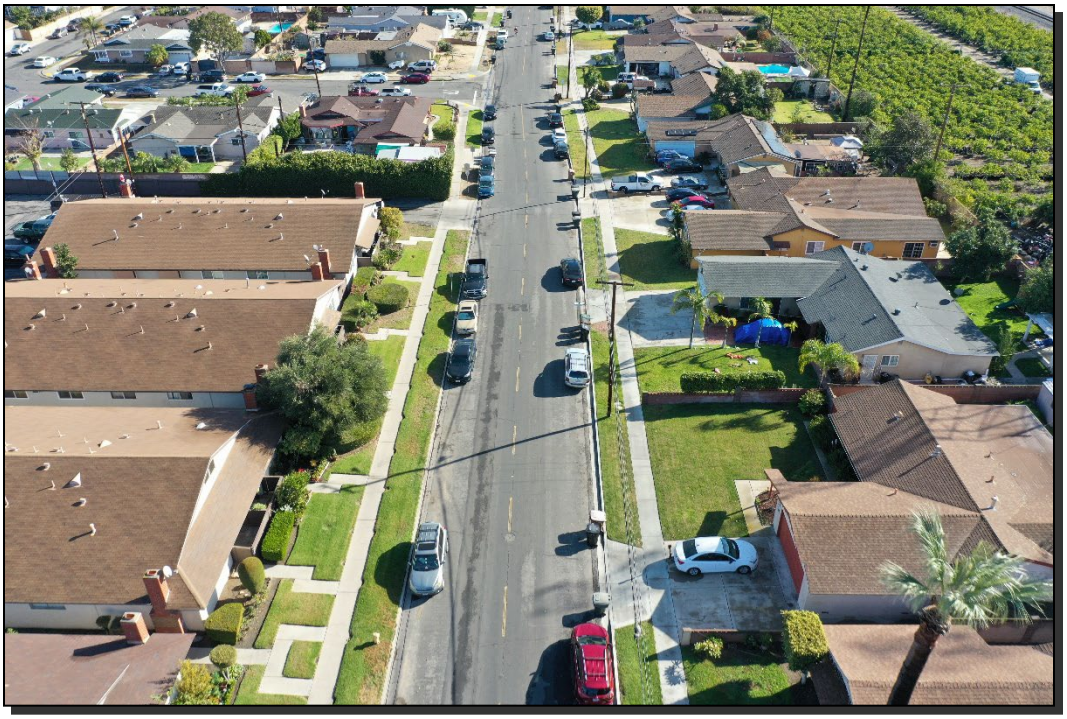
Term or Abbreviation	Definition
	do not make up the entire population of the Unincorporated areas, data from these CDPs was used when data for the entirety of the Unincorporated areas of the County was unavailable. In some instances, census tract data from El Modena, West Anaheim, Orange-Olive, and Stanton is also included because these locations are not part of any CDPs for Unincorporated Orange County, but adding such data provides a more complete data set.
CHAS	The Comprehensive Housing Affordability Strategy data compiled by the U.S. Department of Housing and Urban Development
Continuum of Care or "CoC"	The County's comprehensive regional strategy intended to address homelessness in Orange County, which covers the 34 incorporated jurisdictions, as well as the Unincorporated areas. The CoC is guided by a Board, with participation from County departments and agencies, local governments, homeless, housing, and supportive service providers, community groups, and many other stakeholders. The CoC serves as a means of regional coordination between the various stakeholders to better address homelessness issues on a community-wide level, advocates for funding and resources, provides funding for efforts to quickly rehouse people experiencing homelessness, promotes access to existing programs for homeless individuals and families, and promotes the implementation of best practices and evidence-based approaches to homeless programming and services.
County of Orange or "County"	Includes only Unincorporated Areas of Orange County. The Goals, Strategies, and Actions in the Housing Action Plan apply only to the County.
Density	The amount of development per acre permitted on a parcel under the applicable zoning (inclusive of any overlay zoning), commonly measured as dwelling units per acre (du/ac). Where the County's Housing Opportunities Overlay permits a higher residential density than would otherwise be allowed, the density specified by the Housing Opportunities Overlay governs.
Density Bonus	The allocation of development rights that allow a parcel to accommodate additional square footage or additional residential units beyond the maximum for which the parcel is zoned, generally in exchange for meeting certain requirements (e.g., specified percentage of affordable housing).
Dwelling Unit or "DU"	One or more rooms designed, occupied, or intended for occupancy as separate living quarters
Emergency Shelter	As defined by Section 50801 of the California Health and Safety Code, as may be amended, housing with minimal supportive services for persons experiencing homelessness that is limited to occupancy of one-hundred eighty consecutive days or less and from which no individual or household may be denied emergency shelter because of an inability to pay. This classification includes facilities that provide temporary shelter, meals, showers, and other related services to persons experiencing homelessness and where on-site supervision is provided whenever the shelter is occupied.
Extremely low-income households	Households with an income that is between 15% and 30% or less of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $43,050 for a four-person household, as calculated by HCD for 2023 (this is 30% of the $127,800 AMI for Orange County).
Fair Market Rent	The rent, including utility allowances, determined by the U.S. Department of Housing and Urban Development (HUD) for the purpose of administering the Section 8 Housing Assistance Program.
General Plan	A comprehensive, long-term plan mandated by State Planning Law for the development of a city or county and any land outside its jurisdictional

Term or Abbreviation	Definition
	boundaries, which, in the local jurisdiction's judgment, bears relation to its planning. General Plans consist of seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. General Plans include a statement of development policies for the jurisdiction and serves as a guiding document for development decisions.
HCD	California Department of Housing and Community Development – The State agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of low- and moderate-income households.
Household	Includes all people occupying a single dwelling unit. A household also means all people occupying two dwelling units on the same site if both units are used as group homes owned or operated by the same operator.
Housing Opportunities Overlay or "HOO"	A zoning overlay district within the County that provides for the development of affordable rental housing within commercial and/or industrial districts, and on building sites zoned for high density residential uses, and for the establishment of emergency shelters, multi-service centers and low-barrier navigation centers. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning, so long as all housing units are reserved for households which earn eighty percent or less of the County median income, and seventy percent of the units are reserved for low-income-households and thirty percent of the units are reserved for very low-income households.
HUD	U.S. Department of Housing and Urban Development – The Federal department that administers housing and community development programs nationwide.
Jobs-Housing Balance	A ratio that describes the adequacy of the housing supply within a defined area in terms of meeting the needs of persons who work within the same defined area.
Junior Accessory Dwelling Unit or "JADU"	Pursuant to Government Code Section 65852.22, as may be amended, a junior accessory dwelling unit means a unit that is no more than five hundred (500) square feet in size and contained entirely within an existing or proposed single-family dwelling unit. A junior accessory dwelling unit shall include an efficiency kitchen (sink, cooking appliance, food preparation counter, and storage cabinets) and may include separate sanitation facilities, or may share sanitation facilities with the existing structure
Low-income households	Households with an income that is between 51% and 80% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For the Orange County, this income limit is $114,800 for a four-person household, as calculated by HCD for 2023 (this is approximately 80% of the $127,800 AMI for Orange County).
Median Family Income or "MFI"	Median Family Income as calculated for the relevant area by the U.S. Department of Housing and Urban Development (HUD) for each jurisdiction, to determine the Fair Market Rents and income limits for HUD programs. MFI is not necessarily the same as other calculations of median incomes (e.g., a simple census number) due to a series of adjustments that are made by HUD.
Mixed-Use	A development that combines both residential and non-residential uses on the same lot.
Moderate-income households	Households with an income that is between 81% and 120% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For Orange County, this income limit is $153,350 for a four-person household, as calculated by HCD for 2023 (this is 120% of the $127,800 AMI for Orange County).

Term or Abbreviation	Definition
Multifamily building	A detached building designed and used exclusively as a dwelling by three or more households occupying separate dwelling units.
Multifamily dwelling	Two (2) or more dwelling units within a single building or within two (2) or more buildings on the same site or lot. Types of multifamily dwellings include garden apartments, senior citizen housing developments, apartments, and condominium buildings.
OCTA	Orange County Transportation Authority, the regional transportation authority for planning and operation of transportation and transit within Orange County.
OCHFT	Orange County Housing Finance Trust – a joint powers authority between the County and multiple incorporated cities for the purpose of funding housing that specifically aims to address the needs of the homeless population, and extremely low-, very low-, and low-income households within Orange County.
Ordinance	A law or regulation set forth and adopted by the County's Board of Supervisors. These are generally codified into the County's Codified Ordinances after adoption.
Overcrowded Housing Unit	A housing unit which is occupied by more than one person per room, as defined by the U.S Census Bureau.
Overlay	A regulatory tool that creates a special zoning district, placed over an existing base zoning district. The regulations applicable to the overlay can either supplement or override the regulations for the base zoning district, and its boundaries can either share common boundaries with the base zoning district or cut across base zoning district.
Parcel	A lot or tract of land
Planning Area	The area addressed by a General Plan. For the County's purposes, the Planning Area for this 6th Cycle Housing Element encompasses all of the Unincorporated areas within the County's jurisdictional limits.
RCOC	Regional Center of Orange County, a nonprofit organization contracted by the State to coordinate lifelong services and support for individuals with developmental disabilities and their families.
Regional	Pertaining to activities at a scale greater than that of a single jurisdiction and affecting a broader geographic area.
Regional Housing Needs Assessment or "RHNA"	A quantification by the local council of governments of existing and projected housing need, by household income group, for all localities within a region.
R/ECAP	Racially or Ethnically Concentrated Areas of Poverty
Residential Zoning	Land designated in the General Plan and Zoning Ordinance as allowing for the development of residential uses, including the residential uses authorized by the Housing Opportunities Overlay zone.
SCAG	Southern California Association of Governments – the regional council of governments responsible for allocating the RHNA quantification to individual jurisdictions within the region.
Single-family Dwelling	A dwelling unit designed for occupancy by one household that is located on a single lot. May either be detached (meaning that the lot does not contain any other dwelling unit except for an accessory dwelling unit or junior accessory dwelling unit where permitted and is not connected to another dwelling unit) or attached (meaning that it shares a common wall with another single-family dwelling).

Term or Abbreviation	Definition
Supportive Housing	Housing with no limit on length of stay, that is occupied by the target population for the housing as identified by the provider, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Supportive housing may be provided in single-family dwelling, multifamily dwelling units, residential care facilities, or boarding house uses.
Tenure	This refers to the type of occupancy for a given dwelling unit – that is, whether it is owner-occupied or renter-occupied. Dwelling units that are not owner occupied and are either rented for cash rent or occupied without payment of cash rent are classified as renter occupied.
Transitional Housing	As defined by Government Code section 65582, as may be amended, dwelling units with a limited length of stay that are operated under program requirements that require the termination of assistance and recirculation of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six (6) months from the beginning of the assistance. Transitional housing projects may be designated for homeless or recently homeless individuals or families transitioning to permanent housing. Transitional housing may be provided in a variety of residential housing types including single-family and multifamily dwellings.
Unincorporated CDPs	The pre-2020 CDPs that comprise the majority of the Unincorporated areas include Coto de Caza, Ladera Ranch, Las Flores, Midway City, North Tustin, and Rossmoor. While these CDPs do not comprise the entirety of the Unincorporated areas, data from these CDPs was used where data for the entirety of the Unincorporated areas was unavailable. In 2020, five new CDPs were created in the Unincorporated areas: Modjeska, Rancho Mission Viejo, Silverado, Trabuco Canyon, and Williams Canyon. Data from these new CDPs were included when appropriate.
Very low-income households	Households with an income that is between 31% and 50% of the Area Median Income (AMI) as established by the U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD). For the Orange County, this income limit is $71,750 for a four-person household, as calculated by HCD for 2023 (this is 50% of the $127,800 AMI for Orange County).
Zoning Ordinance or Zoning Code	The Comprehensive Zoning Code of the County of Orange, including zoning district maps and planned community or specific plan development plan maps and texts adopted pursuant to or as an amendment to Orange County Codified Ordinances sections 7-9-25.1, 7-9-47, 7-9-132, and 7-9-133. The Zoning Code is contained in Orange County Codified Ordinances sections 7-9-19 through 7-9-713.

1. INTRODUCTION



Purpose

The purpose of the Housing Element is to ensure the County establishes policies, procedures, and incentives in its land use planning and development activities that will result in the maintenance and expansion of the housing supply to adequately accommodate households current and future population living and expected to live in the Unincorporated County. It institutes policies that will guide County decision-making and establishes an action program to implement housing goals through 2029.

Each jurisdiction within the Southern California Association of Governments (SCAG) region is required to adopt its 2021-2029 Housing Element by October 15, 2021. Although some County housing programs operate within cities, the County's Housing Element primarily addresses housing issues in the Unincorporated County areas. Foremost among these issues is the provision of a mix of housing types to meet the needs of all economic segments of the Unincorporated County areas. In response, the Housing Element makes provisions for affordable and accessible housing for special needs groups in the community and is designed to provide guidance in the maintenance of existing affordable housing. These commitments are an expression of the statewide housing goal of "decent housing and a suitable living environment for every California family."

Citizen Participation

The *California Government Code* requires that local government make a diligent effort to achieve public participation from all economic segments of the community in the development of the Housing Element. In the preparation of the Housing Element Update, a number of organizations and agencies that provide housing, or housing related services, were contacted. Responses from these groups helped guide the Housing Needs Assessment portion of the Housing Element, as well as the Housing Action Plan.

Citizen involvement was accomplished in a number of different ways. Meetings were held with the County Housing Element Resource Team comprised of recognized leaders from business, housing advocacy, social service providers, non-profit organizations, the Building Industry Association, major landowners and developers, and non-profit builders. The Draft Housing Element was posted on the County's website to facilitate public access and comments. (https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2). Community workshops were hosted by OC Development Services, and public hearings were held by the Orange County Planning Commission and Board of Supervisors. Additionally, prior to submitting to the California Department of Housing and Community Development (HCD), the County made the Draft Housing Element available for a 30-day public review and comment period. Following the 30-day public review and comment period, the County utilized a 10-day period to review and incorporate any necessary changes to the document. This proactive outreach effort ensured broad involvement throughout the analytical and policy development phases of the project.

For subsequent draft revisions, the draft revision was made available on the County website and an email with a link to the document was sent to all individuals and organizations that previously requested notices relating to the County's Housing Element at least seven days prior to submitting the draft revision to HCD.

Appendix C provides additional detail regarding opportunities for public involvement along with a summary of public comments and how those comments have been addressed in the Housing Element.

Consistency with State Housing and Planning Law

The Housing Element is one of the seven General Plan elements mandated by the State of California. Sections 65580 to 65590 of the *California Government Code* contain the legislative mandate for the housing element. State law requires that the County's Housing Element consist of "*an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement and development of housing*" (§65583). In addition, the housing element shall identify adequate sites for housing, including rental housing, factory-built housing,

and mobile homes, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

There is no single approved format for a Housing Element. Instead, State law defines components of issues that must be addressed. A Housing Element should clearly identify and address, at a minimum, each component listed below:

The Housing Element shall contain all of the following.

1. Review of existing Housing Element.
2. An assessment of existing and projected housing and employment trends to assess a locality's housing needs for all income levels.
3. An inventory of resources relevant to meeting housing needs.
4. An inventory of constraints relevant to the meeting of these needs.
5. A statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing.

A program that sets forth an eight-year schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element.

General Plan Consistency

The Housing Element is one of nine elements of the Orange County General Plan. The goals, policies, standards, and proposals within this Element relate directly to, and are consistent with all other Elements. The County's Housing Element identifies programs and resources required for the preservation, improvement, and development of housing to meet the existing and projected needs of its population.

The Housing Element is affected by development policies contained in the Land Use Element, which establishes the location, type, intensity, and distribution of land uses throughout the County, and defines the land use build-out potential. In designating the location and density of residential development, the Land Use Element places an upper limit on the number and types of housing units constructed in the Unincorporated County. The acreage designated for a range of commercial and office uses creates employment opportunities for various income groups. The presence and potential for jobs affect the current and future demand for housing at various income levels in the County.

The Public Services and Facilities Element, Resources Element, Safety Element, and Noise Element of the General Plan also affect the implementation of the Housing Element. Together, these Elements establish policies for providing essential infrastructure to all housing units, regulate the amount and variety of open space and recreation areas, delineate acceptable noise levels in residential areas, and establish programs to provide for the safety of the residents. In

sum, policies contained in General Plan Elements directly affect the quality of life for all Unincorporated County citizens.

The Eight-Year Housing Action Plan contained in Section 5 (Housing Action Plan) includes the County's commitments for implementation actions through October 2029.

Housing Element Organization

The Housing Element is comprised of the following major components:

- The Community Profile and Needs Assessment (Section 2) contains an overview of the county's population, housing, and employment characteristics in the context of regional trends, as well as a discussion of existing and future housing needs, including special needs such as the elderly and large families, and the Unincorporated County areas' fair share of regional growth needs.
- Section 3 contains a review of housing constraints and resources, including governmental and market constraints to the maintenance, improvement, and development of housing.
- Section 4 contains a review of Affirmatively Fair Housing and disparities in access to opportunity within incorporated and Unincorporated areas of Orange County.
- The goals, policies, and programs that will guide the County's actions through 2029 are presented in Section 5.
- Appendix A presents a review of the previous Housing Element, including a discussion of the appropriateness of goals and policies, the effectiveness of programs, and the progress in achieving quantified objectives.
- Appendix B presents an analysis and inventory of suitable sites for housing development compared to the jurisdiction's assigned share of the region's housing need.
- Engagement efforts including community workshops, meetings, online and digital outreach, and public hearings are discussed in Appendix C.

2. COMMUNITY PROFILE

The County of Orange is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. A somewhat rectangular landmass, Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles. Unincorporated Orange County represents only a small fragment of the total population of Orange County. The population of the Unincorporated County areas was only 128,421 in 2020, representing less than 5% of the population of Orange County as a whole.

The housing needs of the County are determined by demographic characteristics of the population (age, household size, employment, and/or ethnicity), and the characteristics of housing available to that population (e.g., number of units, tenure, size, cost). The regional housing market is seldom static, constantly changing with dynamic social and economic factors. As County demographics and household socioeconomic conditions change, different housing opportunities arise and/or must be created to meet demand. This section explores the characteristics of the existing and projected population and housing stock in order to define the extent of unmet housing needs in the Unincorporated County. This information helps to provide direction in updating the County's Housing Element goals, policies, and programs.

Population Trends and Characteristics

Between 2000 and 2020, Orange County as a whole, grew by over 348,000 people, or approximately 12%. During this same time period, the population of the Unincorporated County areas declined by about 23.6% to 128,421 persons (**Table 2-1**) due to incorporations and annexations of approximately 20% of Unincorporated land.

Table 2-1
Population Trends 2000-2020

Jurisdiction	2000	2010	2020	Growth 2000 to 2020	
Aliso Viejo	0	47,816	50,351	50,351	5%
Anaheim	328,014	336,265	357,059	29,045	9%
Brea	35,410	39,182	45,498	10,088	28%
Buena Park	77,962	80,520	82,336	4,374	6%
Costa Mesa	108,724	109,960	113,667	4,943	5%
Cypress	46,549	47,802	49,055	2,506	5%
Dana Point	35,110	33,351	33,466	-1,644	-5%
Fountain Valley	54,978	55,313	55,419	441	1%
Fullerton	126,003	135,222	142,070	16,067	13%
Garden Grove	165,196	170,794	173,457	8,261	5%
Huntington Beach	189,627	189,992	198,725	9,098	5%
Irvine	143,072	212,375	277,988	134,916	94%
Laguna Beach	23,727	22,723	22,690	-1,037	-4%
Laguna Hills	29,891	30,270	31,397	1,506	5%
Laguna Niguel	61,891	62,979	64,559	2,668	4%
Laguna Woods	17,794	16,273	16,209	-1,585	-9%
La Habra	58,974	60,223	63,471	4,497	8%
Lake Forest	58,707	77,395	84,556	25,849	44%
La Palma	15,408	15,568	15,607	199	1%
Los Alamitos	11,536	11,449	11,602	66	1%
Mission Viejo	93,102	93,174	95,130	2,028	2%
Newport Beach	70,032	85,186	86,415	16,383	23%
Orange	128,868	136,386	139,504	10,636	8%
Placentia	46,488	50,598	51,569	5,081	11%
Rancho Santa Margarita	47,214	47,853	48,708	1,494	3%
San Clemente	49,936	63,522	64,538	14,602	29%
San Juan Capistrano	33,826	34,593	36,081	2,255	7%
Santa Ana	337,977	324,647	331,304	-6,673	-2%
Seal Beach	24,157	24,168	24,711	554	2%
Stanton	37,403	38,186	39,150	1,747	5%
Tustin	67,504	75,540	80,511	13,007	19%
Villa Park	5,952	5,812	5,821	-131	-2%
Westminster	88,207	89,701	91,931	3,724	4%
Yorba Linda	58,918	64,234	68,426	9,508	16%

Table 2-1
Population Trends 2000-2020

Jurisdiction	2000	2010	2020	Growth 2000 to 2020	
Unincorporated Areas	168,132	121,160	127,510	-40,622	-24%
County Total	2,846,289	3,010,232	3,180,491	334202	12%

**California State Department of Finance, E-4 Report, 2001-2010, with 2000 & 2010 Census Counts*
***California State Department of Finance, E-5 Report, 2011-2020, with 2010 Benchmark*

Most cities within Orange County generally experienced some growth, though not exponential, between 2000 and 2020. However, within the Unincorporated County areas the population shrunk by nearly a quarter because annexations and incorporations physically shrunk the size of the Unincorporated County areas over that period, pulling the population of those annexed and incorporated areas into neighboring jurisdictions. The Board of Supervisors Policy Platform includes policy direction to County staff to encourage annexation of Unincorporated islands. This created higher population growth in neighboring jurisdictions over the last twenty years. The Unincorporated County area's population shrank as a percentage of the total population of Orange County from 2000 to 2020, decreasing from approximately 5.9% of the overall population of Orange County as a whole to approximately 4% of the overall population of Orange County. This decrease in population both in terms of total numbers and in terms of a percentage of the total population of Orange County mirrors the decrease in the Unincorporated County areas' land area during the same period and reflects a trend of both decreasing jurisdictional area for the County and decreasing population within the Unincorporated County areas due to annexations and other factors.

Age Composition

The age breakdown of a population is an important factor in evaluating housing needs and projecting the direction of future housing development. According to the 2010 and 2021 American Community Survey (ACS) data shown in **Table 2-2**, residents in their prime working years (20-64) comprised about 57% of the population of the Unincorporated County areas in 2010, shrinking just slightly to comprise about 56.5% of the population of the Unincorporated County areas in 2021. About 13.9% of residents were "senior citizens" age 65 and older in 2010, with this number growing to encompass approximately 14.3% of the population in the Unincorporated County areas in 2021. This demonstrates an aging population, in line with the trends observed in Orange County as a whole. The median age of persons living in census designated places in Orange County increased between 2010 to 2019, except for the Las Flores Census Designated Place (CDP), which decreased by about 1% (**Table 2-3**). The median age in most Unincorporated CDPs increased between 2010 and 2020, with the largest increases in median age observed in the Coto de Caza CDP (increasing from 42.2 to 46.2) and North Tustin CDP (increasing from 45.6 to 48.6). The Trabuco Canyon, Coto de Caza, North Tustin,

Silverado, and Rossmoor CDPs are the Unincorporated County areas with the highest median age, with the Ranch Mission Viejo, Las Flores, and Ladera Ranch CDPs having the lowest median age. As a whole, the median age in Orange County increased from 36.2 to 37.8 between 2010 to 2020. During the 2010-to-2021-time frame, residents between 0 and 5 years of age demonstrated the largest amount of growth for CDPs within the Unincorporated County areas. Additionally, the percentage of the population falling between the ages of 5 and 49 decreased slightly between 2010 and 2021. This indicates that families residing within the Unincorporated County areas have grown over the last decade, with adults over the age of 50 and children under the age of 5 representing growing segments of the population. In line with these population trends, there is growth in demand for housing suitable for larger family units (that is, multi-bedroom units and/or single-family residences) and multi-generational housing.

Table 2-2
Age Distribution - Unincorporated Census Designated Places (CDPs)

Years	Under 5 years	5 to 19 years	20 to 34 years	35 to 49 years	50-64 Years	65 years +
2010	4.8%	24.5%	11.5%	24.5%	21%	13.9%
2015	5.4%	21.4%	14.1%	20.5%	23.1%	15.7%
2021	6.1%	23.2%	13.1%	21.4%	22%	14.3%

Source: American Community Survey, 5-year Estimates, 2010, 2015, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area

Table 2-3
Median Age by Unincorporated Census Designation Places (CDPs)

Census Designated Place (CDP)	2010	2020
Orange County	36.2	38.3
Coto de Caza CDP	42.2	46.2
Ladera Ranch CDP	32.4	35.2
Las Flores CDP	33.2	32.1
Midway City CDP	37.1	40.3
Modjeska CDP	N/A	38.3
North Tustin CDP	45.6	48.6
Rancho Mission Viejo CDP	N/A	35.2
Rossmoor CDP	45.5	47.5
Silverado CDP	N/A	54.1
Trabuco Canyon CDP	N/A	51
Williams Canyon CDP	N/A	37.6

Source: American Community Survey, 5-Year Estimates, 2019, 2020.
Note: Median age data available for Unincorporated CDPs only, not entire Unincorporated County area.
Note: Modjeska, Rancho Mission Viejo, Silverado, Trabuco Canyon, and Williams Canyon became CDPs in 2020.

Racial and Ethnic Composition

Table 2-4 shows a comparison from 2010 to 2020 of racial and ethnic characteristics for Orange County as a whole, while **Table 2-5** shows a comparison from 2010 to 2020 of racial and ethnic characteristics for the Unincorporated County.

Table 2-4
Racial and Ethnic Breakdown for Orange County
Comparison 2010 and 2020

	White	Hispanic or Latino of Any Race	Asian	Two or More Races	Black	Native Hawaiian and Pacific Islander	American Indian/ Alaska Native	Some Other Race	Total Population
2010	1,328,499	1,012,973	532,477	72,117	44,000	8,357	6,216	5,593	3,010,232
2020	1,198,655	1,086,834	699,124	125,242	49,304	7,714	5,298	14,818	3,186,989
Change	-129,844	73,861	166,647	53,125	5,304	-643	-918	9,225	176,757
% Change 2010 to 2020	-9.80%	7.3%	31.30%	74%	12.1%	-7.7%	-14.8%	165%	5.9%

Source: U.S. Census Bureau, 2010 and 2020 Public Law 94-171 Summary Files. Errata not included.

Table 2-5
Racial and Ethnic Breakdown for Unincorporated Orange County
Comparison 2010 and 2020

	White	Hispanic or Latino of Any Race	Asian	Two or More Races	Black	Native Hawaiian and Pacific Islander	American Indian/ Alaska Native	Some Other Race	Total Population
2010	75,535	25,333	15,034	3,301	1,170	293	279	215	121,160
2020	73,595	29,195	20,936	6,792	1,364	235	200	560	132,877
Change	-1,940	3,862	5,902	3,491	194	-58	-79	345	11,717
% Change 2010 to 2020	-2.6%	15.2%	39.3%	106%	17%	20%	-28.3%	160%	9.7%

Source: U.S. Census Bureau, 2010 and 2020 Public Law 94-171 Summary Files. Errata not included.

As **Tables 2-4** and **2-5** demonstrate, since 2010, the County's housing needs have become more complex as the population has become more diverse. Population data suggests a growing demand for senior housing, along with programs to assist lower-income seniors who wish to "age in place" by adapting their homes to their housing needs. Moreover, population data suggests a more diverse Orange County as a whole, which in turn, likely requires more diverse housing options.

Employment Trends

Current employment and projected job growth have a significant influence on housing needs during this planning period. **Table 2-6** shows that about 65.6% of working-age persons in the entire County were in the workforce, with a similar number of persons in the workforce in Unincorporated CDPs, as reported by 2019 American Community Survey estimates. About 6% of Orange County and Unincorporated CDP residents worked at home, and 34% were not in the labor force (i.e., unemployed, or not seeking work). However, the number of residents working from home has changed since 2019 most likely due to the 2020 pandemic.

Table 2-6
Labor Force – Unincorporated CDPs and Orange County

	Unincorporated CDPs						Orange County					
	2010		2019		2021		2010		2019		2021	
	Persons	%	Persons	%	Persons*	%	Persons	%	Persons	%	Persons	%
In labor force	40,140	65.7%	45,172	64.4%	52,907	65.6%	1,559,264	67.3%	1,671,054	65.6%	1,690,622	65.8%
-Work at home	2,859	4.7%	4,401	6.3%	9,375	11.6%	66,404	2.9%	99,736	3.9%	191,060	7.4%
Not in labor force	20,932	34.3%	24,934	35.6%	27,793	34.4%	756,518	32.7%	877,328	34.4%	877,148	34.2%
-With social security income	6,335	10.4%	7,513	10.7%	9,095	11.3%	227,427	9.8%	278,565	10.9%	285,401	11.1%
Total Population age 16+	61,072	100%	70,106	100%	80,700	100%	2,315,782	100%	2,548,382	100%	2,567,770	100%

Source: American Community Survey, 5 year estimate, 2010, 2019, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.
**Increase in number of persons due to additional CDPs created in 2020.*

In 2022, the Orange County Transportation Authority (OCTA) released the results of an *Employment and Travel Tracking Survey* intended to measure how the 2020 pandemic altered attitudes, working arrangements, travel behaviors, and preferred mode of trips. A baseline study was conducted in February and June 2020, and two tracking studies were conducted in September 2021 and September 2022. These studies did not differentiate between people residing in incorporated cities versus within the Unincorporated County areas, however, the trends observed are likely similar between both incorporated jurisdictions and the Unincorporated County areas. The key takeaways from the study are: 1) the pandemic had dramatic impacts on employment, working arrangements, and travel behavior, 2) Orange County has reached a new normal for remote work which doubled from pre-pandemic levels, and 3) travel and activity patterns stabilized between August 2021 and 2022.
During the early months of the pandemic:

- Unemployment increased from 4% to 18% between February and June 2020.
- Working exclusively from home increased from 12% to 47%.
- Working from home increased from .76 days/week to 2.56 days/week.

By September 2022:

- The percentage working from home 1 or more days/week settled in at 43%, an increase from 23% in February 2022.
- The average number of days working from home (1.49) is double pre-pandemic levels (.76).
- With the decline in remote work from the early months of the pandemic, the percentage of employees driving alone to work increased from 60% in September 2021 to 69% in September 2022.

Link to the OCTA Survey:

https://blog.octa.net/posts/remote-work-in-orange-county-has-doubled-since-pandemic-says-survey/

Consistent with those findings, the Unincorporated County areas reported an increase in employed persons working from home in 2021, as compared to both 2010 and 2019.

In 2018, approximately 52.3% of the Unincorporated working residents were employed in management and professional occupations (**Table 2-7**). A significant number of workers (24.6%) were employed in sales and office related occupations. A relatively low proportion of workers (11.5%) were employed in service-related occupations. Blue collar occupations such as machine operators, assemblers, farming, transportation, handlers, and laborers constituted about 11.6% of the workforce. Numbers in Orange County as a whole are similar.

Table 2-7
Employment by Occupation

Occupation	Unincorporated Areas		Orange County		SCAG Region	
	Persons	%	Persons	%	Persons	%
Management, professional and related	32,503	52.3%	658,308	41.7%	2,616,827	34.2%
Service	7,146	11.5%	272,860	17.3%	1,500,551	19.6%
Sales and office	15,294	24.6%	373,300	23.7%	1,743,617	22.8%
Construction, extraction, and maintenance	2,560	4.1%	101,631	6.4%	675,894	8.8%
Production, transportation, and material moving	4,623	7.5%	171,980	10.9%	1,118,977	14.6%
Total Employment	62,126	100%	1,578,079	100%	7,655,866	100%

Source: American Community Survey, 5-Year Estimate, 2018

Table 2-8
Average Annual Salary by Sector
Unincorporated Areas and Orange County – 2009 and 2017

Occupation	2009		2017	
	Unincorporated Areas In $ (Thousands)	Orange County In $ (Thousands)	Unincorporated Areas In $ (Thousands)	Orange County In $ (Thousands)
Agriculture	$32	$32	$45	$48
Construction	$58	$58	$59	$73
Manufacturing	$39	$37	$73	$77
Wholesale	$74	$71	$93	$86
Retail	$36	$35	$34	$37
Information	$78	$75	$95	$107
Finance-Insurance-Real Estate	$77	$74	$81	$105
Profession-Management	$78	$76	$81	$73
Education-Health	$47	$47	$58	$54
Leisure-Hospitality	$21	$21	$24	$26
Public Administration	$52	$54	$40	$88
Other Services	$32	$32	$31	$38
Non-Classified	$48	$48	N/A	N/A
Average	$52	$51	$57	$63

Source: California Employment Development Department, 2009, 2017

Table 2-8 demonstrates that the average annual salary by sector has increased since 2009 in most sectors in both Unincorporated County areas and Orange County as a whole. Between 2009 and 2017, many sectors experienced increases in annual salary of greater than 25% and some up to 43%.

Future housing needs are affected by the number and type of new jobs created during this planning period. **Table 2-9** shows projected job growth by industry for the Santa Ana-Anaheim-Irvine Metropolitan Statistical Area (MSA) (Orange County) for the period 2018-2028. Labor market information used to identify total employment and employment growth trends within the County is generated for geographic units called metropolitan statistical areas, the MSA covers the same geographic areas as the County. Using the data provided by the State Employment Development Department, total employment in Orange County is expected to grow by 7.2% between 2018 and 2028. The overall growth is expected to add 126,300 new jobs and bring the employment of Orange County to over 1,890,000 by 2028.

Generally, residents who are employed in well-paying occupations have less difficulty obtaining adequate housing than residents in low paying occupations. **Table 2-9** illustrates the growth

trend in low-wage service industries such as health care and social assistance, and accommodation and food services.

Table 2-9
Projected Job Growth by Industry – 2018-2028
Santa Ana-Anaheim-Irvine Metropolitan Statistical Area

Industry Title	Annual Average Employment		Employment Change	
	2018	2028	Jobs	%
Total Employment	1,764,000	1,890,300	126,300	7.2
Self-Employment (A)	109,100	117,300	8,200	7.5
Unpaid Family Workers (B)	--	--	--	--
Private Household Workers (C)	1,700	1,600	(100)	-5.9
Total Farm	2000	1900	(100)	-5.0
Total Nonfarm	1,651,200	1,769,500	118,300	7.2
Mining and Logging	500	400	(100)	-20.0
Construction	106,300	113,000	6,700	6.3
Manufacturing	160,700	156,900	(3,800)	-2.4
Trade, Transportation, and Utilities	261,600	270,800	9,200	3.5
Wholesale Trade	79,800	81,400	1,600	2.0
Retail Trade	152,600	156,000	3,400	2.2
Transportation, Warehousing, and Utilities	29,200	33,400	4,200	14.4
Transportation and Warehousing	26,200	30,200	4,000	15.3
Information	26,700	29,700	3,000	11.2
Financial Activities	118,700	126,100	7,400	6.2
Finance and Insurance	79,300	84,300	5,000	6.3
Real Estate and Rental and Leasing	39,400	41,800	2,400	6.1
Professional and Business Services	317,000	346,500	29,500	9.3
Management of Companies and Enterprises	36,700	38,700	2,000	5.4
Admin/Support and Waste Mgmt & Remediation	151,300	163,600	12,300	8.1
Education Svcs, Health Care, and Social Assistance	224,700	263,600	38,900	17.3
Educational Services (Private)	29,300	33,900	4,600	15.7
Health Care and Social Assistance	195,400	229,700	34,300	17.6
Leisure and Hospitality	222,600	242,200	19,600	8.8
Arts, Entertainment, and Recreation	51,000	56,500	5,500	10.8
Accommodation and Food Services	171,700	185,700	14,000	8.2
Other Svcs (excludes Private Household Workers)	51,400	53,700	2,300	4.5
Government	161,200	166,600	5,400	3.3
Federal Government	11,100	11,200	100	0.9

Table 2-9
Projected Job Growth by Industry – 2018-2028
Santa Ana-Anaheim-Irvine Metropolitan Statistical Area

Industry Title	Annual Average Employment		Employment Change	
	2018	2028	Jobs	%
State and Local Government	150,200	155,400	5,200	3.5
State Government	32,000	33,900	1,900	5.9
Local Government	118,200	121,500	3,300	2.8

Source: California Employment Development Department, April 2021
Industry detail may not add up to totals due to independent rounding
(A) Self-Employed persons work for profit or fees in their own business, profession, trade, or farm. Only the Unincorporated self-employed are included in this category. The estimated and projected employment numbers include all workers who are primarily self-employed and wage and salary workers who hold a secondary job as a self-employed worker.
(B) Unpaid family workers are those persons who work without pay for 15 or more hours per week on a farm or in a business operated by a member of the household to whom they are related by birth or marriage.
(C) Private Household Workers are employed as domestic workers whose primary activities are to maintain the household.
Industry employment is based on the Quarterly Census of Employment and Wages (QCEW) program.

The employment trends indicate that there continues to be a need for moderate- and lower-income housing to support the housing needs of persons in the service and sales industries, including the educational sector, health care sector, entertainment sector, and transportation sector. The demand for affordable homes and apartments is likely to remain very high, while the supply is likely to remain tight. Many of the jobs projected to be generated in the MSA through the year 2028 are expected to be in the educational, health care, entertainment, and transportation sectors.

Table 2-10
Average Travel Time to Work (Minutes)

	Unincorporated Areas	Orange County
2019	29	28
2010	31	25.9
2000	29.8	27.2

Source: SCAG Local Profiles Dataset, 2021

As shown in **Table 2-10,** above, the average travel time to work in the Unincorporated County areas remained relatively consistent from 2000 to 2019 – decreasing by only an eighth of a minute overall. This is consistent with the average travel time to work throughout Orange County, which increased by an eighth of a minute between 2000 and 2019. While travel time to work remains slightly higher on average in the Unincorporated County areas than in Orange County as a whole, the difference is negligible (one minute) and demonstrates that there is a relatively good match between housing and employment opportunities.

Household Characteristics and Trends

To understand current housing concerns and anticipated future needs, housing occupancy characteristics need to be identified. The following is an analysis of household size and income characteristics. As defined within the County's Zoning Code, "a household includes all people occupying a single dwelling unit. A household shall also mean all people occupying two (2) dwelling units on the same site if both units are used as group homes owned or operated by the same operator" (section 7-9-95.1).

Household Composition and Size

As shown by **Table 2-11,** in Unincorporated Orange County, the average annual change in total households between 2010 and 2019, increased by 0.98%, while in Orange County as a whole, the percent change was lower. Most households within Orange County and in Unincorporated CDPs are comprised of family households, with non-family households and householders living alone representing a growing number of the total households between 2010 and 2019. In 2019, 83.4% of households in Unincorporated CDPs and 70% of households in Orange County consisted of families, and about 35.6% in Unincorporated CDPs and 31% in Orange County had school-age children. In comparison, in 2010, family households with school-age children were about 12% and 3% higher, respectively. All other household types remained about the same between these 9 years. About 21% of Orange County households were a single person living alone, compared to 13.2% in Unincorporated CDPs (**Table 2-12**).

Table 2-11
Unincorporated CDPs Household Composition 2010-2019

Household Type	2010		2019		Average Annual % Change
	Households	% of Total Households	Households	% of Total Households	
Total households	27,376	100%	29,938	100%	0.98%
Family households	22,525	82.3%	24,969	83.4%	1.21%
-with own children under 18	10,733	47.6%	10,644	35.6%	-0.092%
Non-family households	4,851	17.7%	4,969	16.6%	0.27%
-Householder living alone	3,645	13.3%	3,975	13.2%	3.02%
Average household size	3.42	--	3.45	--	-

Source: American Community Survey, 5-Year Estimates, 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 2-12
Orange County Household Composition 2010-2019

Household Type	2010		2019		Average Annual % Change
	Households	% of Total Households	Households	% of Total Households	
Total households	992,781	100%	1,037,492	100%	0.5%
Family households	708,491	71.4%	744,011	71.7%	0.55%
-with own children under 18	335,587	33.8%	320,601	30.9%	-0.49%
Non-family households	284,290	28.6%	293,481	28.3%	0.36%
-Householder living alone	207,849	20.9%	218,835	21.1%	0.59%
Average household size	2.99	–	3.01	–	–

Source: Census 2010, Summary File 1- General Population and Housing Characteristics- Demographic Profile 1, American Community Survey, 5-Year Estimates, 2019

In many respects there are notable differences between renter and owner households. According to the 2019 American Community Survey data, over 18% of Unincorporated renter households consisted of one person living alone, a significantly higher proportion than for owners (12%). Large households of 5 or more were more prevalent among renters (15.86%) than owners (14.5%). **Table 2-13** describes household size distribution by tenure.

Table 2-13
Household Size by Tenure (Owner vs. Renter)
Unincorporated Orange County

Household Size	Owners		Renters	
	Households	%	Households	%
1 person households	3,878	12.0%	1708	18.3%
2 person households	11,293	35.0%	2457	26.3%
3 person households	5,734	17.8%	2,055	22.0%
4 person households	6,716	20.8%	1656	17.7%
5 person households	2,985	9.3%	918	9.8%
6 person households	1018	3.2%	355	3.8%
7+ person households	639	2.0%	205	2.2%
Total households	32,263	100%	9,354	100%

Source: American Community Survey, 2014-2018, 5-Year Estimates

Tenure

Table 2-14 shows tenure (owner vs. renter) for the Unincorporated County areas compared to Orange County as a whole. According to the 2018 American Community Survey, 78.4% of housing units in the Unincorporated County areas were owner-occupied, compared to 57.4% countywide. Renters in the Unincorporated County account for 48.3% of households with 2 to 3 persons according to **Table 2-13**. Thus, it appears that there may be fewer rental units (non-

owner occupied) in the Unincorporated County areas, which could result in less availability of rentals, and thus, fewer more affordable options in the Unincorporated County areas.

Table 2-14
Household Tenure (Owner vs. Renter)

Tenure	Unincorporated Areas		Orange County	
	Units	%	Units	%
Owner occupied	33,267	78.4%	592,269	57.4%
Renter occupied	9,166	21.6%	440,104	42.6%
Total occupied units	42,433	100%	1,032,373	100%

Source: American Community Survey 2014-2018, 5-Year Estimates

Households with children may require different or additional design standards and are often larger to accommodate additional persons to avoid overcrowding and displacement. **Table 2-15** displays household types for Unincorporated County areas, Orange County, and the State. Amongst the three jurisdictions, households categorized as "family" made up the largest percent of households overall. Unincorporated County areas and Orange County have a higher percentage of family households than the state. Family households with children represent the same percentage for Orange County as the State and represent larger percentages than non-family households.

Table 2-15
Population by Familial Status

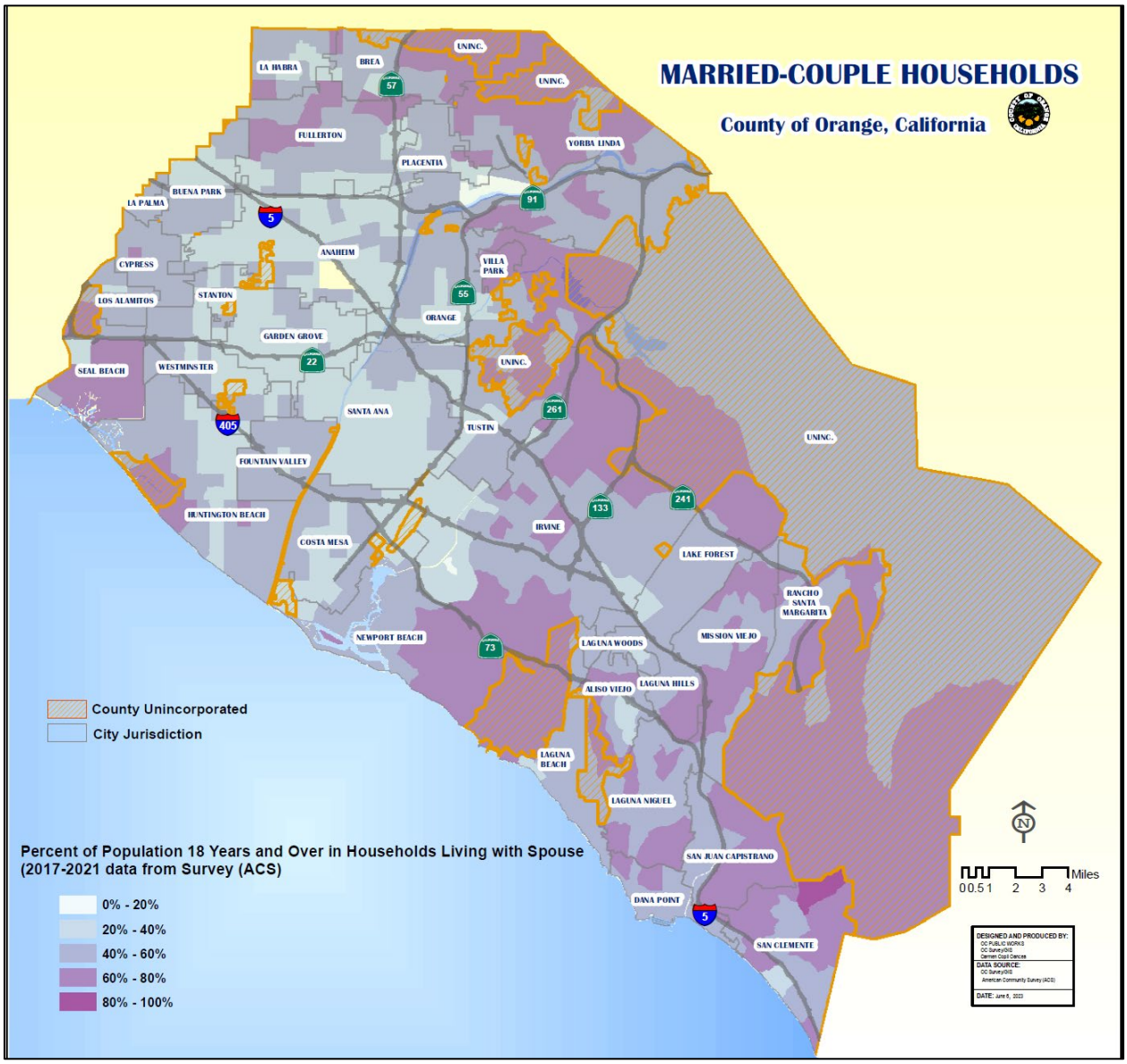
Familial Status	Unincorporated CDPs	Orange County	California
Family Households	83.4%	71.7%	68.7%
Married-Couple Family Households	70.7%	54.9%	49.8%
With Related Children Under 18	35.6%	34.1%	34%
Female Households, No Spouse	9.4%	11.5%	13%
Non-Family Households	16.6%	28.3%	31.3%
Households with One or More People 60 Years+	39.8%	39.9%	39.1%
Total Households	**29,938**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Additionally, **Figures 2-1** through **2-4** below show household type and familial status geographically across Orange County. As the maps demonstrate, the coastal, south Orange County and inland/foothills areas have the highest concentrations of married households and married households with children. The central areas of the County have greater percentages of unmarried and/or female only headed households. As **Table 2-15** demonstrates, the percentage

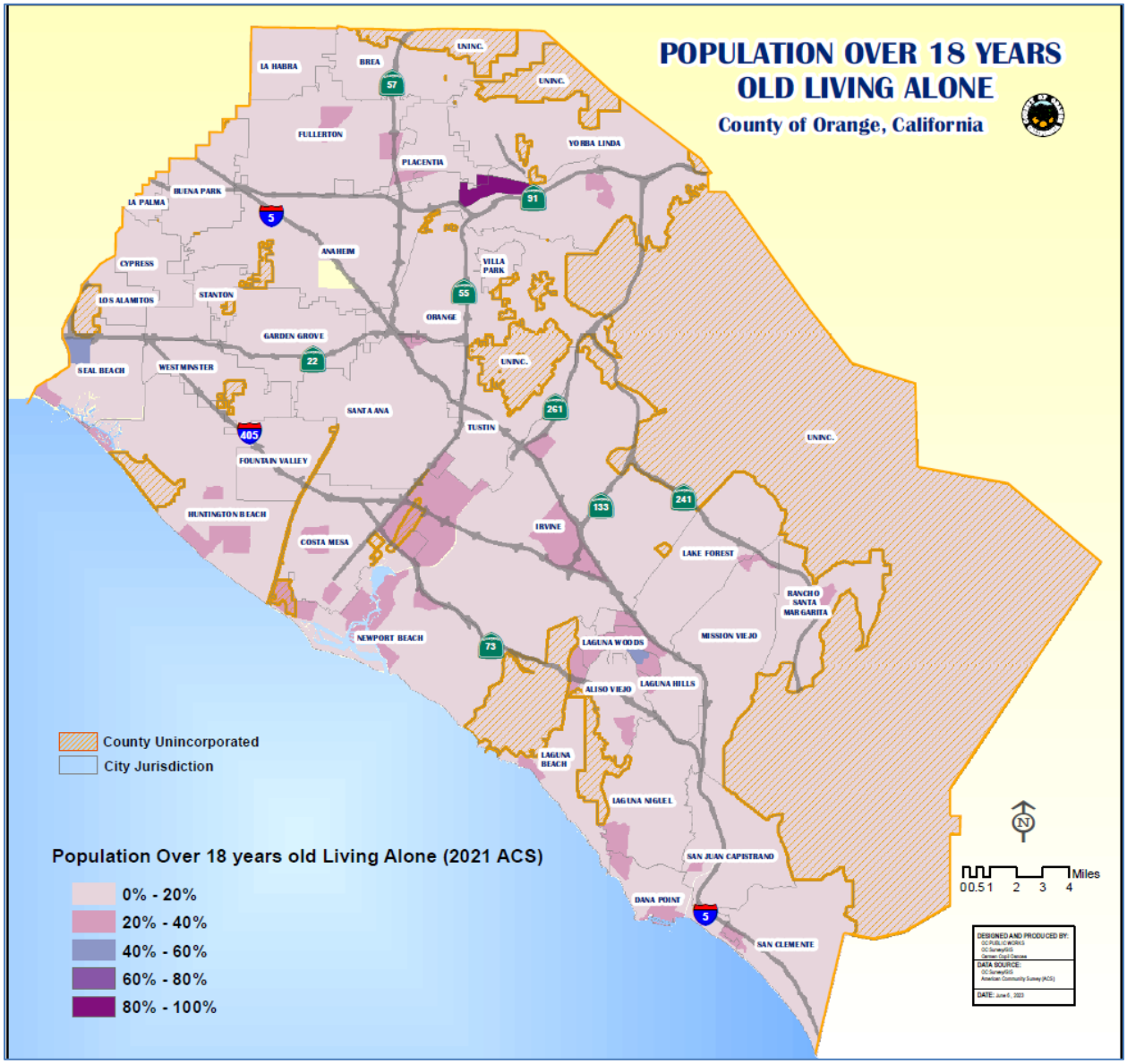
of family households in Orange County exceeds the State percentage. Consistent with these trends, as shown in **Figures 2-1** through **2-4,** the Unincorporated "islands" in the more central parts of Orange County have a higher concentration of unmarried and/or female only headed households, while the Unincorporated County areas in more coastal areas and in inland/foothill areas have high concentrations of married households and married households with children. The Unincorporated "islands" in central areas of Orange County also generally correspond with areas that have higher rates of renters versus homeowners.

Figure 2-1
Married-Couple Households



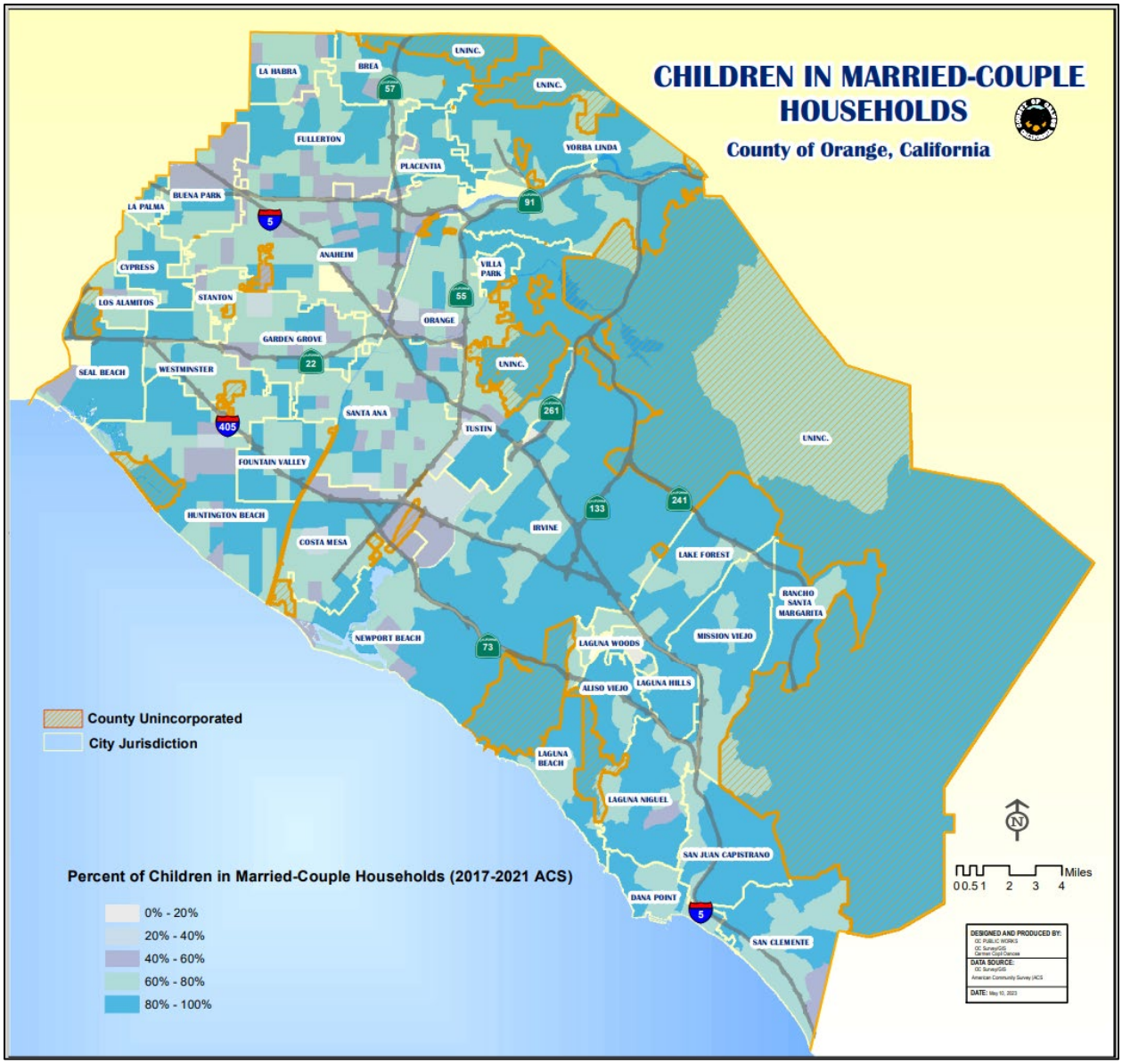
Source: HCD AFFH Data Viewer, 2022

Figure 2-2
Population Over 18 Years Living Alone



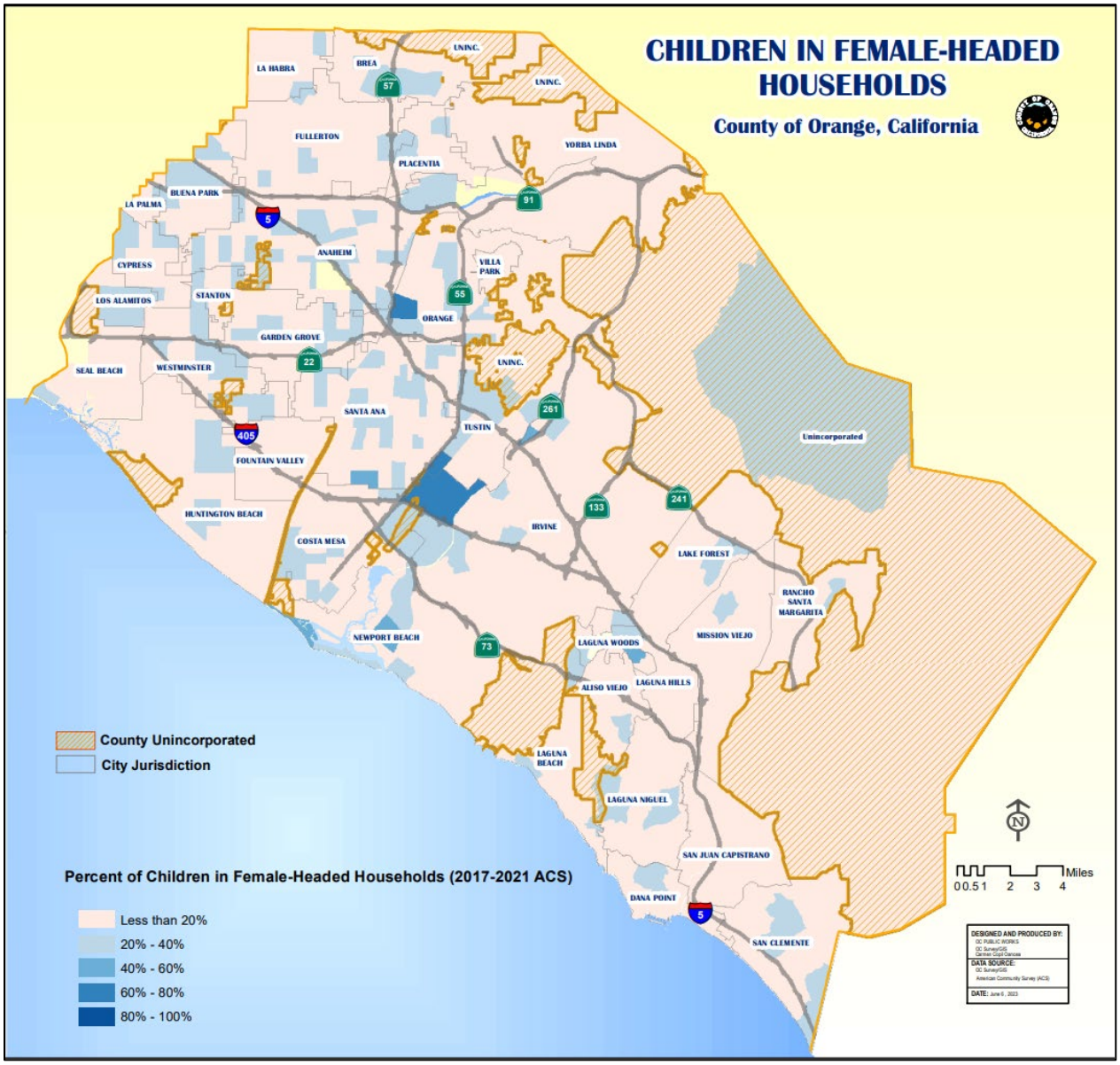
Source: HCD AFFH Data Viewer, 2022

Figure 2-3
Children in Married-Couple Households



Source: HCD AFFH Data Viewer, 2022.

Figure 2-4
Children in Female-Headed Households



Source: HCD AFFH Data Viewer, 2022

Household Income

Household income is a primary factor affecting housing needs in a community. According to the 2021 Census estimates, the median household income in Orange County was $100,485, approximately 16.3% higher than the statewide median income of $84,097 (**Table 2-16**). The table also shows the income differences between different areas of the county. The Coto de Caza and Ladera Ranch Census Designated Places (CDPs), both of which are part of Unincorporated Orange County, had the highest incomes while the Midway City CDP, also a part of Unincorporated Orange County, area was lowest.

Table 2-16
Median Household Income

Jurisdiction	Median Household Income	% of County Median Income
California	$84,097	84%
Orange County	**$100,485**	**100%**
Coto de Caza CDP	$210,990	210%
Ladera Ranch CDP	$169,706	169%
Las Flores CDP	$147,404	147%
Midway City CDP	$48,323	48%
Modjeska CDP	$103,967	103%
North Tustin CDP	$157,487	157%
Rancho Mission Viejo CDP	$152,989	152%
Rossmoor CDP	$153,750	153%
Silverado CDP	$90,938	90%
Trabuco Canyon CDP	$164,417	164%
Williams Canyon CDP	N/A	N/A
El Modena Area (Approx. Avg. Median)	$110,667	110%
Orange-Olive Area (Approx. Avg. Median)	$129,636	129%
Stanton Area (Approx. Avg. Median)	$70,360	70%
West Anaheim Area (Approx. Avg. Median)	$71,866	72%

Source: American Community Survey, 5-Year Estimates, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

As shown in **Table 2-16**, there are no areas of extremely low-income households in Unincorporated Orange County. The Midway City CDP is an area of Unincorporated Orange County with a median income in the very low-income range. In addition, the El Modena and West Anaheim and Stanton census tracts have an average median income in the low-income range. The remainder of Unincorporated County areas are either moderate- or above-moderate-income.

While there are pockets of high AMI households (above-moderate-income households) throughout Orange County, including Unincorporated County areas, there are also pockets of very low- and low-income households. This indicates that the demand for affordable homes and apartments is likely to remain high, while supply is likely to remain tight. As shown in **Table 2-22**, in the Unincorporated County areas, there are 9 ongoing housing projects in various stages of development which are anticipated to provide more than 705 total housing units. However, the demand for rental units – apartments, condominiums, and single-family homes – is likely to remain strong in the future, particularly in the more central areas of Orange County and in the Unincorporated "islands" in those areas, where the percentage of renters is higher than the percentage of owners.

Housing Inventory and Market Conditions

This section summarizes the housing inventory in the Unincorporated County and prevailing market conditions.

Age and Condition of Housing Stock

Age is one measure of housing stock conditions and a factor for determining the need for rehabilitation. Without proper maintenance, housing units deteriorate over time. Thus, units that are older are more likely to need major repairs (e.g., a new roof or plumbing). As a general principle, houses 30 years or older are considered aged and are more likely to require moderate to major repairs. In addition, older houses may not be built to current standards for fire and earthquake safety. According to 2019 American Community Survey data, about 72.9% of owner-occupied units and 53% of rental units in the Unincorporated County areas were built before 1990 and are approximately 30 years old or greater (**Table 2-17**); 41.5% are 60 years or older. This compares to 87% of units in Orange County as a whole, which were built before 1990 and 37.1% which were built before 1960.

Table 2-17
Age of Housing Stock

Year Built	Unincorporated Areas		Orange County	
	Units	%	Units	%
2014 to present	1,612	3.8%	29,369	2.7%
2010-2013	806	1.9%	22,261	2.0%
2000-2009	9,081	21.4%	91,455	8.3%
1990-1999	6,323	14.9%	128,774	11.7%
1980-1989	2,928	6.9%	163,803	14.9%
1970-1979	4,074	9.6%	256,739	23.3%
1960-1969	6,959	16.4%	214,045	19.5%
1950-1959	8,784	20.7%	143,431	13.0%
1940-1949	721	1.7%	23,121	2.1%
1939 and earlier	1,146	2.7%	27,451	2.5%
Total Units	**42,433**	**100%**	**1,100,449**	**100%**
Source: American Community Survey, 5-Year Estimates, 2019				

As reported in recent Census estimates, only 0.1% of owner-occupied units and 1.1% of rental units in the Unincorporated County areas lacked complete kitchen facilities while 0.2% of owner-occupied units and 1.3% of rental units lacked complete plumbing facilities countywide (**Table 2-18**). There may also be units that require rehabilitation or replacement despite possessing complete kitchen and plumbing facilities.

Table 2-18
Kitchen and Plumbing Facilities

	Unincorporated Areas		Orange County	
	Units	%	Units	%
No Telephone Service Available	424	1.00%	21,459	1.95%
Lacking Plumbing Facilities	144	0.34%	4,292	0.39%
Lacking Complete Kitchen Facilities	424	1.00%	14,196	1.29%
Source: American Community Survey 2005-2019, SCAG Local Housing Data Pre-Certified Local Housing Data 2020				

To determine the condition of the housing stock, the County conducted a recent assessment of code enforcement complaints within Unincorporated Orange County. **Table 2-19** summarizes the results of the assessment.

Table 2-19
Housing Rehabilitation Need –
Unincorporated Orange County – 2019-2020

Unincorporated Areas	Number of Property Maintenance Complaints in 2020	Number of Property Maintenance Complaints in 2019
Anaheim Island	72	54
Costa Mesa Islands	2	5
Coto De Caza	1	6
Foothill/Trabuco	1	5
Ladera Ranch	8	2
Las Flores	N/A	1
Midway City	76	30
North Tustin	69	146
Orange Park Acres	23	42
Placentia Islands	3	4
Rancho Mission Viejo	4	2
Rossmoor	18	34
Silverado-Modjeska	16	17
Yorba Linda Islands	1	10
Source: OC Public Works 2020		

Based on the assessment of recent property maintenance complaints in 2019 and 2020, most of the concerns are located in the Anaheim Islands, Midway City, North Tustin, and Orange Park Acres. The complaints vary from the collection of junk and debris, lack of yard maintenance, storage of inoperable vehicles, unpermitted buildings, and animals/insects. Approximately 29 of the 300 total Unincorporated properties with maintenance complaints in 2020 are noted as having unpermitted or substandard units; therefore approximately 1% of the total units with identified property maintenance complaints may need to be replaced or rehabilitated.

Overall, the housing stock in the Unincorporated County areas is in good condition, despite the fact that the vast majority of homes are 20 or more years old. Only a small minority of the housing stock requires replacement or serious rehabilitation, indicating that housing maintenance or repair is not a major concern or contributing factor for housing needs within the Unincorporated County.

Housing Stock Profile

Table 2-20 summarizes the distribution of housing by type in the Unincorporated portions of Orange County as of 2020. Throughout the Unincorporated County, single-family detached (SFD) units characterize the most abundant housing type (75.2%); larger multifamily projects of

five or more units represent 10.3% of the stock; and single-family attached units, such as condominiums, represent 11% of the total housing.

Looking at the change from 2000 to 2020, **Table 2-20** shows the housing stock of the Unincorporated County areas has decreased by about 30.62% due to annexations and incorporations. The County of Orange lost 168 Unincorporated acres due to annexations since 2014. The Unincorporated County areas have shrunk significantly since 2014, with a 9.5% decrease in acreage from 176,553 acres to 176,385 acres.

Table 2-20
Housing by Type

Structure Type	2000		2020		Growth	
	Units	%	Units	%	Units	%
Unincorporated Areas						
Single-family detached	38,725	63%	31,909	75.2%	-6,816	-17.6%
Single-family attached	9,438	15%	4,674	11%	-4,764	-50.48%
Multifamily 2-4 units	2,530	4%	862	2%	-1,668	-65.9%
Multifamily 5+ units	9,925	16%	4,356	10.3%	-5,569	-56.1%
Mobile homes	543	1%	632	1.5%	89	16.4%
Total Units	61,161	100%	42,433	100%	-18,728	-30.62%
Orange County						
Single-family detached	489,657	51%	556,760	50.1%	-67,103	-13.7%
Single-family attached	124,702	13%	132,709	12%	8,007	6.4%
Multifamily 2-4 units	88,804	9%	94,718	8.5%	5,914	6.6%
Multifamily 5+ units	233,871	24%	293,712	26.4%	59,841	25.6%
Mobile homes	32,450	3%	33,522	3%	1,072	3.3%
Total Units	969,484	100%	1,111,421	100%	141,937	14.6%
Source: California Department of Finance, Table E-5, 2020						

Single-family detached houses continue to represent the largest proportion of the existing housing stock within the Unincorporated County areas, which is consistent with the housing stock trends in Orange County as a whole. This trend also reflects the fact that the majority of Unincorporated County areas are concentrated in the coastal and foothill areas of the County, which generally reflect a higher percentage of people who own their homes as opposed to rent, while the more central areas of Orange County have both a higher concentration of multifamily units and a higher percentage of people who rent.

Despite the loss of acreage and associated housing units to incorporations and annexations, single-family attached homes, and multifamily developments of five or more units represent the second and third largest proportions of the existing housing stock, respectively, within the Unincorporated County areas. These trends are on par with the trends within Orange County as a

whole; however, the Unincorporated County areas have a smaller overall number and percentage of multifamily developments than the larger County. Where Orange County's overall housing stock in 2020 was comprised of approximately 26.4% multifamily developments with five or more units, the Unincorporated County areas' total housing stock was comprised of 10.3% multifamily developments with five or more units. This indicates that there is a demand for multifamily developments that is likely to remain and to potentially grow, in addition to the continued demand for single-family housing. While the demand is high, the existing stock of both single-family housing and multifamily housing remains tight.

Residential Construction Trends

The majority of residential construction within the Unincorporated areas is occurring within the Ranch Plan Planned Community, which includes a mix of residential housing types. At full build out, the Ranch Plan Planned Community is approved to have 14,000 dwelling units, including both single-family attached and detached residences, as well as multifamily developments of various sizes. Since 2019, Planning Area 3.1 of the Ranch Plan Planned Community has been fully permitted and will ultimately accommodate 775 residential dwelling uses as well as 120,000 square feet of Senior Living Facility uses. Planning Areas 3 and 4 are still being permitted, but at ultimate build out will include an additional 7,500 dwelling uses. This planned development represents the largest residential construction that is planned within the Unincorporated areas, concentrated towards the southern end of the Unincorporated areas. Planning Area 3.2a was issued certificates of occupancy in January 2023 and includes 145 deed-restricted senior housing (Age Qualified) and 134 market-rate, for sale units. Planning Area 3.2b has been approved with six neighborhood builders for a total of 514 units.

Beyond the Ranch Plan Planned Community, there are smaller residential developments planned in other portions of the Unincorporated areas. Together, these smaller planned developments total approximately 145 dwelling units, with 95 of those units being part of a planned, dedicated senior-living facility. **Tables B-14** in Appendix B show the affordable housing developments that have occurred within the Housing Opportunities Overlay Zone. Below, **Table 2-21** shows the residential developments in the Unincorporated areas that have been completed since 2015. In addition, **Table 2-22** shows the pending housing developments for the Unincorporated areas, including a breakdown by the types of units permitted.

Table 2-21
Completed Housing Units
Unincorporated Orange County (2015 – Current)

	Single-Family	2-4 units	5+ Units	ADUs	Total
2015	164	0	270	2	436
2016	494	0	37	7	538
2017	710	0	56	14	780
2018	470	6	339	5	820
2019	347	2	0	8	357
2020	105	108	0	11	224
2021	100	3	0	34	137
2022	232	15	83	38	368
2023	109	0	0	10	119

Source: OC Development Services, May 2023

Table 2-22
Pending Housing Developments - Unincorporated Orange County

Development Name	Number Units	Type of Units	Price Range	Status
Ranch Hills Estates	37	Condo	Above Moderate	A
Legacy at Coto	100	Multifamily/Apartments	Above Moderate	P
Esperanza Village	44	Condo	Above Moderate	P
Oak Grove	13	Single-Family Development	Above Moderate	P
Saddlecrest	65	Single-Family Development	Above Moderate	UC
Cielo Vista	80	Single-Family Development	Above Moderate	UC
Esperanza Hills Specific Plan	340	Single-Family Development	Above Moderate	A
Wass Condo	10	Condo	Above Moderate	A
Cowan Heights Estates	16	Single-Family Development	Above Moderate	UC

Status: P=Pending Entitlements/Approval C = Complete, UC = Under Construction, A = Approved (Tentative or Final Map)
Source: OC Development Services, May 2023

As a whole, the pending housing developments within the Unincorporated areas, along with the affordable housing developments within the Housing Opportunities Overlay Zone show a trend towards the development of additional housing within the limited area available for such development in the Unincorporated area. However, as the pending housing developments included in **Table 2-22** demonstrate, the majority of pending housing developments are generally geared towards above-moderate-income households. On average, since 2015, 420 units per year were constructed within the Unincorporated areas, with a total of 3,779 units constructed since 2015. 785 of the units constructed since 2015 (approximately 21% of the total units) are housing units within large multifamily complexes containing structures with five or more units, while 134

of the units constructed since 2015 (approximately 4% of the total units) are 2-to-4-unit developments, and 2,731 units are single-family units (approximately 72% of the total units). The remaining 3 % of the units developed since 2015 (129 units) consist of accessory dwelling units or junior accessory dwelling units located on existing residential properties.

Of the currently pending residential developments, totaling 705 units, 27 % (or 191 units) are in condominium or multifamily unit developments with ten or more total units each. The remaining 73 % of the currently pending housing developments are single-family units. This trend in pending developments is consistent with the residential development that has occurred over the past decade within the Unincorporated areas. As indicated by **Table 2-16,** the Midway City and Las Flores CDPs that are within the Unincorporated County, likely need additional low and/or very low-income housing. Additionally, as indicated by **Tables 2-21 and 2-22,** there is likely to remain a need for additional multifamily developments and for additional low- and very low-income housing within the Unincorporated areas, while supply is likely to remain tight if existing trends continue. SCAG's local profile for the Unincorporated areas reveals that only 3.9% of the total households in Orange County reside in the Unincorporated areas (as of 2018), but retained a higher number of total residential units permitted per 1,000 residents than in Orange County as a whole (4.7 permits per 1,000 residents in the Unincorporated areas versus 2.5 permits per 1,000 residents in Orange County as a whole) as of 2018. *(Source: SCAG Profile of Unincorporated Orange County, Local Profiles Report, 2019.)*

Vacancy Rates and Trends

Vacancy trends in housing are analyzed using a "vacancy rate" which establishes the relationship between housing supply and demand. The vacancy rate is an indicator of the general availability of housing. It also reflects how well available units meet the current housing market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high vacancy rate may indicate either an imbalance between household characteristics and the type of available units, an oversupply of housing, or special situations such as in areas where there are vacation homes.

The availability of vacant housing units provides households with choices on different unit types to accommodate changing needs (e.g., single persons, newly married couples, and elderly households typically need smaller units than households with school age children). A low vacancy rate may contribute to higher market rents and prices and may limit the choices of households in finding adequate housing. It may also be related to overcrowding, as discussed later.

Table 2-23 provides 2019 American Community Survey occupancy and tenure characteristics for the Unincorporated areas compared to Orange County as a whole. Owner occupied housing units in Unincorporated areas represented 77.5% of all occupied housing units, whereas those in Orange County as a whole represented a lower 57.4% indicating a higher rate of rental units

outside of the Unincorporated areas. The data indicated a 11.8% rental vacancy rate in the Unincorporated areas and a 26.3% rental vacancy rate in Orange County as a whole. These figures indicate a strong real estate market with a relatively low vacancy rate– at the lowest in Unincorporated areas (3.8%) as compared to Orange County as a whole (5.7%).

Table 2-23
Housing Vacancy

	Unincorporated Areas		Orange County	
	Units	%	Units	%
Total housing units	42,433	100%	1,100,449	100%
Occupied units	40,804	96.2%	1,037,492	94.3%
-Owner occupied	31,623	77.5%	595,272	57.4%
-Renter occupied	9,181	22.5%	442,220	42.6%
Vacant units	1,629	3.8%	62,957	5.7%
-For rent	192	11.8%	16,547	26.3%
-For sale	456	28.0%	6,124	9.7%
-Rented or sold, not occupied	401	24.6%	9,492	15.1%
-For seasonal or occasional use	363	22.3%	18,865	30%
-All other vacancies	218	13.4%	11,929	19%

Source: American Community Survey, 5-Year Estimates, 2019; SCAG Pre-Certified Local Housing Data 2020

According to the American Community Survey's 2019 data and SCAG Local Housing Data for 2020, there were approximately 1,629 total units considered vacant in the 2019-2020 timeframe, with approximately 22.3% of those units reserved for seasonal or occasional use, and an additional 24.6% of the total vacant units being rented or sold but unoccupied. The information in **Table 2-23** indicates that there is a high demand for rental units, but low vacancy. Similarly, there is a high demand for sale units, but low vacancy, though the vacancy rate applicable to for sale units is higher than rental units (28% as compared to 11.8%). The combined effect of these vacancy rates indicates that there is a demand for rental units and a slightly lower demand for units available for purchase, but insufficient supply to meet either of those demands, potentially contributing to issues with affordability for available housing.

Housing Units At-Risk of Conversion

Housing units that are at-risk of conversion are those multifamily, rental housing complexes that receive government assistance under any of the federal, state, and/or local housing assistance, including any combination of rental assistance, mortgage insurance, interest reductions and/or direct loan programs, and which are eligible to convert to market rate units within 10 years of the beginning of the housing element planning period. In other words, at-risk units are only those that receive some kind of governmental assistance and do not include those which are considered

affordable, but which receive no governmental assistance. There is a risk that such units will be converted to market-rate (less or not affordable) units when a rent subsidy contract expires or is terminated, or when restrictions on the units associated with governmental assistance programs expire. Within Unincorporated Orange County, there are no units anticipated to be at-risk during the planning period. Whenever units receiving governmental assistance near the end of their contracts to receive governmental assistance, OC Community Resources attempts to negotiate either a new contract or an extension of the existing contract to ensure that the units remain available and are not converted to market rate housing. OC Community Resources will continue to do so throughout the planning period as part of the County's efforts to address regional housing need.

Housing Units Demolished or Converted in the Coastal Zone

State law requires that coastal jurisdictions monitor and report the number of low-and moderate-income ("L/M") housing units within the Coastal Zone that are constructed or lost due to demolition or conversion to non-residential uses since 1982.

The amount of Unincorporated territory within the Coastal Zone has decreased considerably since 1982 due to the incorporation of Dana Point and Laguna Niguel as well as annexations to the Cities of Laguna Beach, Newport Beach, and Huntington Beach. The only major Unincorporated County area with residential development in the Coastal Zone is Emerald Bay. Bolsa Chica, Laguna Coast Wilderness Park, Aliso-Wood Canyon Regional Park, and Banning Ranch are the other major Unincorporated County coastal areas. **Table 2-24** shows the number of Low/Moderate income housing units constructed, demolished, converted, and replaced within the Coastal Zone since 1982.

- A total of 33 units were demolished or converted between 1982 and 1988, but the income category of these units was not recorded.
- Between 1989 and 2000, 15 units were demolished and replaced, including several in Emerald Bay which were demolished as a result of fire damage during the devastating fires that occurred in October 1993. The income category for these 15 units was not recorded. No units were converted from residential to non-residential use during this time.
- From 2001 through 2012, 262 units were demolished, including 221 units in a mobile home park.
- From 2012 to 2020, 23 units were demolished. The income category of these units is unknown.

Table 2-24
Low- and Moderate- Income Units Constructed, Converted, Demolished, and Replaced in the Coastal Zone – 1982-2020

Time Period	Units Constructed	Units Demolished	Units Converted	Units Replaced
1982-1988	1278[b]	29[a]	4[a]	N/A
1989-2000	0	15[a]	0	15 [a]
2001-2012	77[a]	262[a]	0	N/A
2012-2020	27	23	0	N/A
Total	1382[a]	329[a]	4[a]	15[a]

Notes:
a. Numbers reflect total units, not just Low/Moderate units. Specific income category not available
b. Numbers reflect only Low/Moderate units.
Source: Orange County, OC Public Works, OC Development Services, 2020

Housing stock within the Coastal Zone has remained limited since 1982 and has become more so as coastal areas have been incorporated or annexed to cities. However, the construction of 1,382 housing units, 1,278 of which fall within the Low/Moderate category, has increased the total housing stock within the Coastal Zone since 1982 notwithstanding the approximately 329 demolished units and 4 converted units. In total, since 1982, 1,068 units have been constructed in the Coastal Zone – less the units that have been demolished and converted since 1982.

Housing Cost

Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the AMI: extremely low (30% or less of AMI), very low (31-50% of AMI), low (51-80% of AMI), moderate (81-120% of AMI) and above-moderate (over 120% of AMI). Housing affordability is based on the relationship between household income and housing expenses. According to the U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development[1] (HCD), housing is considered "affordable" if the monthly payment is no more than 30% of a household's gross income. In some areas (such as Orange County), these income limits may be increased to adjust for high housing costs.

Table 2-25 shows 2023 affordable rent levels and estimated affordable purchase prices for housing in Orange County[2] by income category. Based on state-adopted standards, the maximum affordable monthly rental housing costs for a four-person acutely low-income household is $478, for a four-person extremely low-income household it is $1,076, while the maximum affordable housing costs for four-person very low-income households is $1,793. The maximum affordable

[1] HCD memo of 2/25/2013 (http://www.hcd.ca.gov/hpd/hrc/rep/state/inc2k13.pdf)
[2] Affordable rent and purchase prices are based on county median income.

housing cost for four-person low-income households is $2,870, and the maximum for four-person moderate-income households is $3,195.

Table 2-25
Income Categories and Affordable Housing Costs
Orange County

2023 County Median Income = $127,800*	Income Limits	Affordable Rent	Maximum Affordable Price (est.)
Acutely Low (<15%)	$19,150	$478	$58,030
Extremely Low (<30%)	$43,050	$1,076	$141,147
Very Low (31-50%)	$71,750	$1,793	$275,961
Low (51-80%)	$114,800	$2,870	$478,333
Moderate (81-120%)	$127,800	$3,195	$541,525

*Note: * As determined by California Department of Housing and Community Development*
Assumptions:
- Based on a family of 4
- 30% of gross income for rent or Principal/Interest/Taxes/Insurance
- 2023 HCD income limits; 30% gross household income as affordable housing cost; 15% of monthly affordable cost for taxes and insurance; 10% down payment; and 4.5% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on Orange County Utility Allowance.
Source: Orange County Housing Authority 2020 Utility Allowance Schedule and California Department of Housing and Community Development, 2020 income limits, and Kimley Horn and Associates Assumptions

Maximum purchase prices are more difficult to determine due to variations in mortgage interest rates and qualifying procedures, down payments, special tax assessments, homeowner association fees, property insurance rates, etc. With this caveat, the maximum home purchase prices by income category shown in **Table 2-25** above have been estimated. For-Sale Housing Existing housing resale price statistics for calendar years 2000 to 2023, are shown in **Table 2-26**.

Table 2-26
Median Home Sales Price – Unincorporated Areas and Orange County

Year	Unincorporated Areas		Orange County	
	Price ($)	% Change	Price ($)	% Change
2000	519,500	--	289,193	--
2001	582,100	12.1%	322,386	11.5%
2002	594,100	2.1%	375,777	16.6%
2003	659,100	10.9%	441,861	17.6%
2004	881,600	33.8%	563,303	27.5%
2005	946,000	7.3%	645,292	14.6%
2006	1,085,500	14.7%	689,422	6.8%
2007	1,012,800	-6.7%	681,015	-1.2%

Table 2-26
Median Home Sales Price – Unincorporated Areas and Orange County

Year	Unincorporated Areas		Orange County	
	Price ($)	% Change	Price ($)	% Change
2008	664,702	-34.4%	506,117	-25.7%
2009	620,673	-6.6%	415,000	-18.0%
2010	564,303	-9.1%	433,000	4.3%
2011	507,400	-10.0%	439,000	1.4%
2012	519,300	2.3%	422,000	-3.9%
2013	730,000	13.2%	535,000	21.9%
2014	795,000	8.9%	582,000	8.8%
2015	811,500	2.1%	609,000	4.6%
2016	839,750	3.5%	645,000	5.9%
2017	879,000	4.7%	685,000	6.2%
2018	924,000	5.1%	725,000	5.8%
2019	959,500	3.8%	740,000	2.1%
2020	1,000,750	4.3%	771,750	4.3%
2021	1,152,750	15.2%	889,000	15.2%
Year	**Unincorporated CDPs***		**Orange County**	
July 2022	1,407,500	22.1%	980,000	10.2%
July 2023	1,470,200	4.5%	1,055,000	7.6%

**Average median home sales prices of Unincorporated CDPs including: Coto de Caza, Ladera Ranch, North Tustin, and Rancho Mission Viejo only, not the entire Unincorporated area.*
Source: SCAG Local Profiles Dataset, 2021, Redfin

The table shows that the median price for resale homes in the Unincorporated areas in 2020 was $1,000,750 while the median price countywide was $771,750 and these numbers have only gone up in 2022 and 2023, with the median price in Unincorporated areas rising to $1,407,500 and $1,470,200 respectively and the median price countywide rose to $980,000 in 2022 and $1,055,000 in mid-2023. These trends are consistent with the rapid increase in home prices observed statewide beginning in 2020 which have only continued, with the median home price in Orange County consistently $150,000 to $200,000 higher than the median home price statewide from late 2018 through September 2023. Based on the estimated affordable purchase prices shown in **Table 2-26** those units below the median sale price could be affordable to lower- or moderate-income households. These data illustrate the fact that public subsidies are generally required to reduce sales prices to a level that is affordable to very low-income buyers. Absent public subsidies or other programs to reduce the sales price of homes, the average sales price throughout Orange County exceeds what is generally affordable to extremely low-, very low-, and low-income households. To assist low-income home buyers, get into their first home, the

County's Mortgage Assistance Program provides silent (deferred payment) down payment loans. (See Section 5 Housing Action Plan.)

Based on a comparison of the affordable rent and purchase amounts for each income category in **Table 2-26** with the median price of homes and gross rent as shown in **Table 2-27,** since 2015, home prices throughout Orange County, including the Unincorporated areas, have increased at a faster rate than household income. The number of households that can comfortably afford the median priced home has declined since 2015, particularly when it comes to extremely low- and very low-income households. Programs to assist lower-income households (extremely low-, very low-, low-, moderate-income) first-time buyers could help narrow the affordability gap.

Rental Housing

According to the American Community Survey data for Orange County as a whole, monthly median gross rent in Orange County reached a countywide total of $1,854 and $2,261 in Unincorporated areas in 2019. As **Tables 2-27 and 2-28** show, the median gross rent has increased for all unit sizes, except 4-bedroom units in Unincorporated CDPs, between 2015 and 2019 for Orange County and Unincorporated CDPs. In Orange County as a whole, studio apartments experienced the most rent increase with an approximate 30 % increase since 2015, while 3-bedroom units in the Unincorporated CDPs experienced the greatest rent increase since 2015. In Orange County as a whole, units with at least 5 bedrooms had the lowest percent increase at 13.1 % and in the Unincorporated CDPs, 4-bedroom units saw a 7.1 % reduction in price. Overall, the median gross rent increased by 19.8 % between 2015 and 2019 in Orange County as a whole and increased to a greater degree, 25.3 %, in Unincorporated Orange County. Real estate professionals expect rents to continue rising in the near future as growing demand exceeds the pace of new apartment construction.

Table 2-27
Median Gross Rent by Bedrooms in Orange County (2015-2019)

Unit-Based Size	2015	2016	2017	2018	2019	% Change 2015-2019
Studio	$1,115	$1,164	$1,256	$1,358	$1,457	30.7%
1 Bedroom	$1,255	$1,307	$1,384	$1,479	$1,574	25.4%
2 Bedrooms	$1,572	$1,627	$1,711	$1,794	$1,869	18.9%
3 Bedrooms	$2,054	$2,130	$2,185	$2,277	$2,372	15.5%
4 Bedrooms	$2,391	$2,441	$2,535	$2,617	$2,741	14.6%
5 or More Bedrooms	$2,472	$2,639	$2,624	$2,655	$2,796	13.1%
Median Gross Rent	**$1,548**	**$1,608**	**$1,693**	**$1,777**	**$1,854**	**19.8%**

Source: American Community Survey, 5-Year Estimates, 2019.

Table 2-28
Median Gross Rent by Bedrooms in Unincorporated CDPs (2015-2019)

Unit-Based Size	2015	2016	2017	2018	2019	% Change 2015-2019
Studio	$1,108	$1,074	$1,615	$1,288	$1,331	20.1%
1 Bedroom	$1,348	$1,632	$1,892	$1,773	$1,838	36.4%
2 Bedrooms	$1,787	$1,753	$1,745	$1,863	$2,311	29.3%
3 Bedrooms	$2,285	$2,600	$2,458	$2,471	$3,150	37.9%
4 Bedrooms	$2,983	$2,900	$3,080	$2,790	$2,771	-7.1%
5 or More Bedrooms	$2,571	$3,030	$3,061	$3,464	$3,342	30.0%
Median Gross Rent	**$1,805**	**$1,956**	**$2,037**	**$2,208**	**$2,261**	**25.3%**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

When market rents are compared to the amounts lower-income households can afford to pay (as shown in **Table 2-25**), it is clear that very low- and extremely low-income households have a difficult time finding housing without overpaying. The gap between market rent for an average apartment and affordable rent at the very low-income level is about $400 per month, while the gap at the extremely low-income level is $881 per month. However, at the low-income and moderate-income levels, households have a much better chance of finding affordable rentals. The affordable payment for a 4-person low-income household falls between $1,205 and $1,926. Since 2015, average rental costs have increased at a faster rate than household income. The number of households that can comfortably afford the median gross rent throughout the County has declined since 2015 as shown by the percent change median gross rent increase of 19.8% in Orange County as a whole and 25.3% in Unincorporated CDPs between 2015 and 2019 as

compared to the highest affordable rent based on income for a low-income household being $2,561. Programs to assist extremely low- and very low-income renters could help narrow the affordability gap. See Strategy 1f, previous Housing Action Plan. The County also administers many funding programs to assist with the affordability gap including:

- HOME Funds used for tenant-based rental assistance and/or property acquisition; Community Development Block Grants which provide homebuyer assistance.
- Mortgage Credit Certificate Program, which provides first-time homebuyers with a tax credit of up to 15% of the mortgage interest paid for the year based on a percentage of the interest paid on their mortgage.
- Down Payment Assistance Loans for first-time homebuyers, which may be used in conjunction with the Mortgage Credit Certificate Program.
- Section 8 Housing Choice Voucher Program, which provides monthly housing assistance payments to assist extremely low- and very low-income families, elderly, and disabled persons with their rent payments that typically represents the difference between 30% of the recipient's adjusted monthly income and the federally approved Fair Market Rents, locally established Payment Standards, or the owner's Gross Rent, whichever is less.
- Housing Opportunities for Persons with AIDS funds which can be used for either project-based or tenant-based rental assistance, or short-term rent, mortgage, and utility payments, and other items.
- CalHome funds which can be used to assist with down payments, mortgage financing, homebuyer counseling, and technical assistance.
- California Emergency Solutions and Housing funds which can be used to provide housing stabilization services, including rental assistance.
- Housing for a Healthy California funding which can be used to provide rental subsidies and rental assistance for existing and new supportive housing opportunities for those who are chronically homeless or homeless.
- Permanent Local Housing Allocation funds, which can be used to provide rental assistance to individuals who would otherwise be at risk of homelessness or to provide down payment assistance.
- Transitional Housing Program funding, which can be used to help young adults aged 18 to 25 years of age in securing and maintaining housing.
- Funding through the California Housing Finance Agency to provide below-market interest rate mortgages to first-time homebuyers through approved private lenders.

- Funding through the California Housing Finance Agency to finance the construction or substantial rehabilitation of projects containing 20 or more housing units, with 20% of the units set aside for low-income tenants at affordable rents for at least 15 years to however long the mortgage is outstanding on the building.
- The Orange County Mortgage Assistance Program provides silent (deferred payment) down payment assistance loans to assist low-income first-time homebuyers whose annual income is 80% or less of the Area Median Income for eligible families in the Unincorporated areas and in participating cities.

Through these funding programs, and other programs which are specifically aimed at increasing the supply of affordable housing (both rental and for sale), the County aims to narrow the affordability gap for both residents in the Unincorporated areas and in surrounding incorporated cities.

Housing Needs

The following analysis of current housing conditions in Unincorporated Orange County presents housing needs and concerns relative to various segments of the population. This analysis relies in part on the County's Consolidated Plan (for Fiscal Years 2020-2024, adopted by the Board of Supervisors on June 23, 2020), which addresses the needs of the lower-income segment of the community and strategies to address those needs.

Several factors will influence the need for new housing in Orange County in coming years. The three major needs categories considered in this element include:

- Existing housing needs resulting from the overcrowding, overpayment, or substandard housing conditions.
- Housing needs of "special needs groups" such as the elderly, large families, people experiencing homelessness, and disabled.
- Housing needs resulting from population growth.

Demographic and market conditions analysis indicates that the number of households at the extreme ends of the income spectrum will continue to grow ("polarization of income" phenomenon), while the traditional middle income segments' participation in the housing market will decline both in size and activity.

In terms of specific housing needs, home ownership and first-time homebuyer programs are important for moderate- to above-moderate-income population in achieving home ownership. Lower-income groups will need the most assistance in meeting the increasingly higher cost burdens associated with owning a home, but for the most part these groups will be unable to

purchase homes in the County. The needs of lower-income groups, therefore, are usually met by the rental market.

In sum, since Orange County has a large population of affluent homeowners, greater attention needs to be placed on the affordability gap in the resale of smaller and lower priced homes to lower-income and first-time homebuyers. Attention will need to be placed in creating more opportunities for larger families in the rental market as well.

Overcrowding and Overpayment

Overcrowding and overpayment are indicators of barriers to housing and may additionally indicate imbalances in the existing housing demand and available stock. Both may help identify existing housing conditions that need to be addressed as well as households with housing cost burdens or unmet housing needs.

Housing is generally the single greatest expense for California families, and for households that are strained by housing costs, they may compensate by occupying smaller or insufficiently sized dwellings. Where there is more than one person occupying a room (excluding bathrooms and kitchens), a unit is considered overcrowded and health and safety concerns increase, and stress on the condition of existing housing stock and infrastructure increases as well.

Overcrowding

Overcrowding is often closely related to household income and the cost of housing. The U.S. Census Bureau considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, with severe overcrowding when there are more than 1.5 occupants per room. **Table 2-29** summarizes recent Census estimates of overcrowding for the Unincorporated areas as compared to the entire county.

Table 2-29
Overcrowding in Orange County and Unincorporated Areas

	2009		2015		2019	
	Unincorporated Areas	Orange County	Unincorporated CDPs Only*	Orange County	Unincorporated Areas	Orange County
Owner-Occupied Households	32,473	598,752	29,699	582,151	32,263	595,272
1.0+/Room Owner	548 1.7%	18,515 3.1%	546 1.8%	16,678 2.9%	725 2.2%	15,700 2.6%
1.5+/Room Owner	157 0.5%	6,423 1.1%	265 0.9%	5,679 1.0%	207 0.6%	6,186 1.0%
Renter-Occupied Households	7,322	375,249	10,852	427,202	9,354	442,220
1.0+/Room Renter	422 5.8%	38,259 10.2%	943 8.7%	43,665 10.2%	948 10.1%	43,328 9.8%
1.5+/Room Renter	344 4.7%	24,594 6.6%	563 5.2%	25,572 6.0%	257 2.7%	26,468 6.0%

Source: American Community Survey, 5-Year Estimates, 2009, 2015, 2019 and SCAG Pre-Certified Local Housing Data, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.*

Overcrowding was much more prevalent among renters than for owner-occupied units in both the Unincorporated areas and Orange County as a whole. Between 2009 and 2019, between 2.7% and 5.2% of renter households within the Unincorporated areas experienced overcrowding, a lower rate than experienced elsewhere in Orange County (between 6 and 6.6%). However, owner-occupied households experienced between 0.5% and 0.9% overcrowding during the same period in the Unincorporated areas. This indicates a demand for more rental housing within the Unincorporated areas and within Orange County as a whole, while supply remains tight. Notably, however, the overcrowding within the Unincorporated areas is less severe than Orange County as a whole. Programs removing barriers to the construction of more rental housing, such as existing policies streamlining the permit process for accessory dwelling units or duplexes, may assist in increasing the supply of rental housing to address overcrowding. Additionally, rental assistance programs may be able to reduce the barriers to extremely low- and very low-income households renting a unit with sufficient rooms. Existing funding sources incentivize both new and existing landlords to sign new renters that benefit from housing assistance and provide further assistance to renters to help defer move-in costs.

Overpayment

According to State housing policy, overpaying occurs when housing costs exceed 30% of gross household income. **Table 2-30** displays recent estimates of households in Unincorporated CDPs that are overpaying for housing. According to SCAG, and as shown in **Table 2-31**, over 50% of all renter households in the Unincorporated areas were overpaying for housing. **Table 2-32**

displays mortgage-holding households (owners) in the Unincorporated areas overpaying for housing. Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For lower-income renters, severe cost burden can require families to double up resulting in overcrowding and related problems.

Table 2-30
Household Cost Burden – Unincorporated CDPs and Orange County

Income	Orange County		Unincorporated CDPs	
	Household Cost Burden		Household Cost Burden	
	>30%	>50%	>30%	>50%
Household Income less-than or = 30% MFI	135,715	114,560	1,960	1,685
Household Income >30% to less-than or = 50% MFI	101,280	48,175	1,590	1,125
Household Income >50% to less-than or = 80% MFI	97,005	22,425	2,350	1,030
Household Income >80% to less-than or = 100% MFI	33,515	4,100	1,160	210
Household Income >100% MFI	40,440	3,670	2,600	400
Total Households	407,955	192,930	9,660	4,454

Source: HUD CHAS, 2019
Note: MFI refers to the HUD Area Median Family Income – this is the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. MFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments that are made.
Note: MFI in Orange County in 2019 was $97,900 as determined by HUD
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Table 2-31
Renter Overpayment by Income Category
Unincorporated Orange County

% of Income Paid for Housing	Renters	
	Households	%
All households	9,354	100.0%
Less than 10%	265	2.83%
10-14.9%	776	8.30%
15-19.9%	686	7.33%
20-24.9%	1,035	11.06%
25-29.9%	1,023	10.94%
30-34.9%	1,029	11.0%
35-35.9%	695	7.43%
40-49.9%	853	9.12%
50% or more	2,328	24.89%
Not computed	664	7.10%
Households overpaying	4,905	52.40%
Source: SCAG Pre-Certified Local Housing Data – August 2020		

Table 2-32
Homeowner Overpayment by Income –
Unincorporated Orange County

% of Income Paid for Housing	Number of Households by Annual Income				
	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 or more
Over 30%	499	635	714	1,834	5,485
20-29%	0	21	64	209	6,904
Under 20%	0	0	15	194	8,192
Source: SCAG Pre-Certified Local Housing Data – August 2020					

As the above tables demonstrate, 1,960 households in Unincorporated Orange County areas making less than 30% of the AMI are having to pay more than 30% of their income to household costs. According to SCAG Pre-Certified Local Housing Data, there are a total of 41,617 households in Unincorporated Orange County. Thus, 4.7% of all households in Unincorporated Orange County areas have to pay more than 30% of their income to household costs. This means that extremely and very low-income households are disproportionately impacted by overpayment in Unincorporated areas. In addition, 52.44% of renters in Unincorporated areas pay 30% or more of their income for rental costs. These numbers demonstrate that more than 50% of renters are overpaying, which again, disproportionately impacts lower-income households. According to

SCAG data, 9,167 households or 22% of mortgage holding (homeowner) households in Orange County pay more 30% or more of their income for housing costs. According to SCAG data, 5,485 homeowners, or 22% of all homeowners covered in **Table 2-32**, making $75,000 or more are still paying more than 30% of their income towards housing costs. Approximately 7% of all households in Unincorporated areas making less than $50,000 per year are paying over 30% of their incomes to housing costs.

According to the most recent *Orange County Analysis of Impediments To Fair Housing Choice, April 2020* (Orange County AI), "[t]here are 194,569 households in [all of] Orange County experiencing housing cost burden, with monthly housing costs exceeding 30 % of monthly income. 104,196 of these households are families. However, Orange County has only 429 Project-Based Section 8 units and 33 Other Multifamily units with more than one bedroom capable of housing these families. Housing Choice Vouchers are the most utilized form of publicly supported housing for families, with 2,286 multi-bedroom units accessed. Large family households are also disproportionately affected by housing problems as compared with non-family households. Some focus groups have communicated that regulations and cost issues can make Orange County too expensive for families. The high percentage of 0-1- bedroom units in publicly supported housing and the low percentage of households with children in publicly supported housing support this observation."

Based on the data, the households experiencing monthly housing costs exceeding 30% of monthly income in Unincorporated Orange County areas make up only 1% of the households in all of Orange County facing household cost burden. This is not a significant percentage demonstrating that the Unincorporated Orange County areas do not face significant cost burden challenges compared to other jurisdictions in the County.

Table 2-33
Publicly Supported Housing Units by Program Category, Orange County

Housing Units	Number	% of Households Experiencing Cost Burden
Total Households Experiencing Housing Cost Burden	194,569	-
Publicly Supported Housing Units		
- Public Housing	N/A	N/A
- Project-based Section 8	429	0.22%
- Other Multifamily	33	0.02%
- HCV Program	2,286	1.2%
- LITHC	2,110	1.1%

Source: HUD Inventory Management System (IMS)/PIH Information Center (PIC),

Table 2-34
Publicly Supported Housing Demographics, Orange County

	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Project-Based Section 8	164	40.80%	9	2.24%	88	21.89%	138	34.33%
Other Multifamily	22	95.65%	0	0.00%	1	4.35%	0	0.00%
HCV Program	808	35.96%	156	6.94%	412	18.34%	866	38.54%
LIHTC	1,352	25.12%	254	4.72%	1,621	30.11%	991	18.41%
Total Households	140,530	67.71%	2,907	1.40%	30,185	14.54%	29,767	14.34%
0-30% of AMI	14,094	61.62%	259	1.13%	4,388	19.18%	3,541	15.48%
0-50% of AMI	23,293	50.78%	503	1.10%	9,148	19.94%	6,728	14.67%
0-80% of AMI	43,952	56.98%	926	1.20%	14,322	18.57%	11,131	14.43%

Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

Tables 2-33 and **2-34,** above, show the total numbers and percentages of different kinds of affordable housing supported by funding that the County facilitates. The numbers vary between the two tables, because of the slightly different information they track, and because they were compiled by different sources in different years. However, taken together, they show that the largest percentage of publicly supported housing is supported by the Housing Choice Voucher (HCV) program, followed by the Low-Income Housing Tax Credit (LIHTC) program, with Section 8 project-based vouchers and other forms of multifamily public housing support falling significantly behind in terms of the total number of housing units each of those funding programs support. The data also indicates that the largest amount of support provided by public housing programs goes to White households, followed by Hispanic and Asian or Pacific Islander households.

As shown in **Table 2-34,** in Project-Based Section 8 developments, the majority racial/ethnic group in Orange County as a whole is either White or Asian/Pacific Islander. Housing Choice Voucher households are the most evenly distributed across racial/ethnic groups. According to the Orange County AI, Asian American or Pacific Islanders make up a majority of HCV units in Westminster, Fountain Valley, and Garden Grove, and a majority in Santa Ana. They also make up a plurality in Orange County, followed closely by White residents.

County Programs to Encourage Development of Affordable Housing

Several County programs encourage and assist in the development of affordable housing and relieve overpayment. Those programs are described in brief below and are incorporated into the Housing Action Plan in Section 5.

Housing Opportunities Overlay Zone (see Program 1):

The goal of the Housing Opportunities Overlay Zone is to facilitate the development of affordable housing units on underutilized non-residentially zoned land in the Unincorporated areas by allowing for residential uses on commercial and industrial zoned sites. The Board of Supervisors adopted the Housing Opportunities Overlay Zone regulations on January 10, 2006. To provide guidelines for the development of Housing Opportunity sites, the Planning Commission approved the Housing Opportunities Manual on June 21, 2006.

The Housing Opportunities Overlay Zone allows affordable housing development by-right (i.e., without a Use Permit) in the following commercial and industrial districts:

- C1 – Local Business.
- C2 – General Business.
- CC – Community Commercial
- CH – Commercial Highway.
- CN – Commercial Neighborhood.
- M1 – Light Industrial.
- MX – Mixed-Use

The Housing Opportunities Overlay Zone's affordability requirements include the following criteria:

- Rental projects.
- 100% of the units must be affordable to low- and very low-income households (70% low-income and 30% very low-income) for at least 55 years.
- For sites located within a commercial or industrial zoning district, the site development standards for the R3 "Apartment" District shall apply except that the base density shall be 70 dwelling units per acre (net development area) and maximum building height shall be sixty-five (65) feet.

If necessary to make the project economically feasible, the County offers the following incentives:

- Density bonus.
- Setback reduction.
- Increased maximum lot coverage.
- Increased building height.

Although not considered an incentive, the County also offers alternative (reduced) parking requirements for residential development within the Housing Opportunities Overlay Zone.

On December 9, 2008, the Board of Supervisors adopted a Zoning Code amendment extending the Housing Opportunities Overlay Zone regulations to multifamily districts:

- R2 – Multifamily Dwelling.
- R3 – Apartment.
- R4 – Suburban Multifamily
- RP – Residential Professional.

On July 28, 2020, the Board of Supervisors adopted a Zoning Code amendment to increase the base density from 25 to 43.5 dwelling units per acre (du/ac).

On September 27, 2022, the Board of Supervisors, in compliance with State law requiring that any necessary rezoning to accommodate RHNA be completed by October 15, 2022, adopted a Zoning Code amendment to increase the base density in the Housing Opportunities Overlay Zone from 43.5 to 70 du/ac, excluding any applicable density bonus units. On June 25, 2024, the Board of Supervisors adopted a Zone Change to include a Mixed-Use District to be included in the Housing Opportunities Overlay.

Since the adoption of the Housing Opportunities Overlay Zone, eight projects (within the Housing Opportunities Overlay Zone) with a total of 306 affordable units have been approved, which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families (see Table A-3). The average density of these projects has been over 37.68 units per acre as compared to the initial base density of 25 units per acre. Appendix B contains a detailed discussion of the additional development capacity of parcels in the Housing Opportunities Overlay Zone.

Density Bonus (see Program 5):

Beyond local requirements, California law allows for a 35% increase in the density of a residential development when a housing developer agrees to construct any of the following: a minimum of 20% of the total units of a housing development for lower-income households or 10% of the total units for very low-income households. A senior housing development is also eligible for a 20% density bonus if it includes at least 35 dwelling units, and the applicant seeks a density bonus.

The County must also provide at least one of the following:

- A reduction in site development standards or a modification of zoning code requirements or architectural design requirements that exceed the minimum building standards approved by the California Building Standards Commission.
- Approval of mixed-use zoning in conjunction with the housing project if commercial, office, industrial, or other land uses will reduce the cost of the

housing development and if the commercial, office, industrial, or other land uses are compatible with the housing project.

- Other regulatory incentives or concessions proposed by the developer or the city, county, or city and county that result in identifiable cost reductions.

Table 2-35, below, shows a summary of the affordable projects that have been developed within Orange County between 2006 and 2022 at various densities ranging from 12 to 63.4 dwelling units per acre. A significant portion of these projects have been successfully developed at densities of 20 to 25 units per acre, which demonstrates that the existing allowable densities are not an issue and that affordable developments may also benefit from density bonuses as a means of providing additional affordable units.

Funding Resources to Encourage Development of Affordable Housing (see Program 11):

The County has a variety of funding resources available to address affordable housing and overpayment. Each funding resource is described in detail in the Housing Action Plan, but the potential programs are listed here as relevant to overpayment and affordability: HOME Funds, Community Development Block Grant Program, Section 108 Program, Mortgage Credit Certificate Program, Section 8 Housing Assistance Program, Affordable Housing and Sustainable Communities Program, CALHOME, Golden State Acquisition Fund, Local Housing Trust Fund, Multifamily Housing Program, National Housing Trust Fund, Permanent Local Housing Allocation, Predevelopment Loan Program, Supportive Housing Multifamily Housing Program, California Housing Finance Agency, Low-Income Housing Tax Credit, Orange County Housing Trust, Orange County Housing Finance Trust, and the County's Mortgage Assistance Program. **Table 2-35**, below, is a list of the affordable projects that have received funding from the County and been developed within Orange County between 2006 and 2022.

Table 2-35
Affordable Projects That Received Funding from County of Orange
Built or Acquired 2006 – 2022

Project/ Location	Year Built or Acquired	Total Units	General Plan	Zoning	Allowable Density (du/ac)	Project Density (du/ac)	Affordability/ Assistance Level	Funding
Laguna Canyon/Irvine	2006	120	Unknown	Med. Density Residential	Unknown	20.98	30 and 50%	2002 NOFA
Ability First Apartments/ Irvine	2008	24	Med. Density Residential	Med. Density Residential	Unknown	12	30% AMI	2001 NOFA
Dorado Senior Apartments/ Buena Park	2007	150	Unknown	Commercial	Unknown	62	30,50 and 60% AMI	2006 NOFA
Stratford Place and Windsor Court	2005	86	Unknown	Unknown	Unknown	28.01	30,50 and 60% AMI	ATT 5.21.02 RFP
Northwood Apartments/ Irvine	2006	96	Medium High Density Residential	Medium-High Density Residential	Unknown	20.96	30 & 50% AMI	2002-B NOFA
Montecito Vista Apartments/ Irvine	2006	162	Unknown	Research and Industrial	Unknown	22.98	30,50 and 60% AMI	2005 NOFA
Cornerstone Apartment Homes/ Anaheim	2007	49	Suburban Residential	CN – Commercial Neighborhood and Housing	25	33.8	30,50 and 60% AMI	2005 NOFA

Table 2-35
Affordable Projects That Received Funding from County of Orange
Built or Acquired 2006 – 2022

Project/ Location	Year Built or Acquired	Total Units	General Plan	Zoning	Allowable Density (du/ac)	Project Density (du/ac)	Affordability/ Assistance Level	Funding
				Opportunities Overlay Zone				
Granite Court	2008	71	Unknown	Unknown	Unknown	Unknown	30,50 and 60% AMI	2004 NOFA & Apartment Development Revenue Bonds, Issue A of 2007
Woodbury NE Apartments	2008	150	Unknown	Unknown	Unknown	Unknown	30,40 and 50% AMI	2005 NOFA
Birch Hills Apartment Homes	2012	114	Unknown	Unknown	Unknown	Unknown	30, 45 and 50% AMI	2010 NOFA
Buena Vista Apartments	2011	17	Suburban Residential	C2 General Business District	25	33.8	30, 40 and 60% AMI	2010 NOFA
Stonegate I Apartments	2009	38	Suburban Residential	C1 Local Business District	25	33.8	30, 40, 50 and 60% AMI	2008-B NOFA
Stonegate II Apartments	2009	26	Suburban Residential	C1 Local Business District	25	33.8	30, 40, 50 and 60% AMI	2008-B NOFA
San Clemente Senior Apartments	2012	76	Unknown	Unknown	Unknown	Unknown	30 & 50% AMI	2010 NOFA
Doria Apartment Homes Phase I	2011	60	Unknown	Unknown	Unknown	Unknown	30, 45 and 60% AMI	2008-B NOFA
Avenida Villas	2011	29	Suburban Residential	R3 Apartment District	43	35.4	30% AMI	2010 NOFA
Diamond Aisle Apartments	2009	25	Unknown	Unknown	Unknown	Unknown	30% AMI	2006 NOFA
Bonterra Apartment Homes	2010	94	Suburban Residential	Planned Community	Unknown	21	30, 35, 50 and 60% AMI	2005 NOFA
Cerritos Family Apartments	2012	60	Suburban Residential	R2 Multifamily Dwelling District	43	30	50% and 80% AMI	2010 NOFA
Potter's Lane	2017	16	Community	C2 General Business	25	39	30% AMI	2014 NOFA
Heroes' Landing	2020	76	Commercial	Unknown	Unknown	Unknown	30% AMI	SNHP, 2014 NOFA
Casa Querencia	2021	57	Unknown	Unknown	Unknown	Unknown	30% and 60% AMI	SNHP, 2014 NOFA
Placentia Veterans Village	2020	50	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA
Salerno at Cypress Village	2020	80	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA
Buena Esparanza	2021	70	Unknown	Unknown	Unknown	Unknown	30% AMI	2014 NOFA-PBV 2016 NOFA SNHP
Della Rosa	2020	50	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	2016 NOFA
Santa Ana Arts Collective	2020	58	Unknown	Unknown	Unknown	Unknown	30, 35, 40, and 60% AMI	SNHP, 2020 NOFA
Westminster Crossing	2021	65	Unknown	Unknown	Unknown	Unknown	20 and 70% AMI	SNHP, 2016 & 2020 NOFA
Altrudy Senior Apartments	2021	48	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
FX Residences	2022	17	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
Legacy Square	2023	93	Unknown	Unknown	Unknown	Unknown	30% AMI	SNHP, NPLH & 2016 NOFA
Fountain Valley Housing	2022	50	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
Casa Paloma	2022	71	Unknown	General Business	25	95	30 and 50% AMI	2016 NOFA
The Groves	2022	75	Community Commercial	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
The Crossroads at Washington	2023	86	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 NOFA
Villa St. Joseph	2023	50	Unknown	Unknown	Unknown	Unknown	20% AMI	NPLH & 2020 NOFA
Airport Inn	2021	58	Unknown	Unknown	Unknown	Unknown	30% AMI	2016 & 2020 NOFA

Table 2-35
Affordable Projects That Received Funding from County of Orange
Built or Acquired 2006 – 2022

Project/ Location	Year Built or Acquired	Total Units	General Plan	Zoning	Allowable Density (du/ac)	Project Density (du/ac)	Affordability/ Assistance Level	Funding
Mountain View	2023	71	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
WISEPlace Supportive Housing	2024	52	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Cartwright Family Apartments	2023	60	Unknown	Unknown	Unknown	Unknown	30%-80% AMI	2020 NOFA
Lincoln Avenue Apartments	2023	55	Unknown	Unknown	Unknown	Unknown	30, 50, 60, and 70% AMI	SNHP
Santa Angelina Senior Community	2023	65	Unknown	Unknown	Unknown	Unknown	25 and 60% AMI	2020 NOFA
Orchard View Gardens	2023	66	Unknown	Unknown	Unknown	Unknown	30%-60% AMI	SNHP & 2020 NOFA
Center of Hope/The Salvation Army	2022	72	Unknown	Unknown	Unknown	Unknown	25 and 30% AMI	SNHP, NPLH & 2020 NOFA
Westview House	2023	85	Unknown	Unknown	Unknown	Unknown	30 and 60% AMI	SNHP, NPLH & 2020 NOFA
Huntington Beach Senior Housing	2023	43	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	SNHP, NPLH & 2020 NOFA
Paseo Adelanto	2023	50	Unknown	Unknown	Unknown	Unknown	30 and 50% AMI	2020 NOFA
Valencia Gardens Orange Corporate Yard	2023	62	Unknown	Unknown	Unknown	Unknown	30 and 60% AMI	2020 NOFA
The Meadows	2021	65	Unknown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	2020 NOFA
North Harbor Village	2022	91	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #1: Stanton Inn	2020	72	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #2: Tahiti Motel	2020	60	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #3: Riviera Motel	2020	21	Unkown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	2020 NOFA
Homekey Property #4: HB Oasis	2020	64	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Homekey Property #5: Motel 6	2020	88	Unknown	Unknown	Unknown	Unknown	30% AMI	2020 NOFA
Miraflores	2022	86	Unknown	Unknown	Unknown	Unknown	30, 50 and 60% AMI	MHSA from OCHFT

Source: OC Community Resources/Housing, June 16, 2023

Accessory Dwelling Units (ADUs)(see Program 7)

In response to state-mandated requirements and local needs, the County permits a property owner in any district, including planned community and specific plan areas, where a single-family unit exists on a parcel zoned for such purposes, to apply to establish an accessory dwelling unit (ADU) along with junior accessory dwelling unit (if owner occupied) by-right.

The definition of ADUs and JADUs are provided below:

"Accessory dwelling unit" (ADU) is defined as a dwelling unit providing complete independent living facilities for one (1) or more persons that is located on a parcel with another primary, single-family dwelling as defined by Government Code Section 65852.2, as may be amended. It shall include permanent *provisions* for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling's location. An ADU may be within the same structure as the

primary unit, in an attached structure, or in a separate structure on the same parcel. This use is distinguished from a duplex.

"Junior Accessory Dwelling Unit" (JADU) is defined as a unit that is no more than five hundred (500) square feet in size and contained entirely within an existing or proposed single-family dwelling unit, pursuant to California Government Code Section 65852.22, as may be amended. A JADU shall include an efficiency kitchen (sink, cooking appliances, food preparation counter, and storage cabinets) and may include separate, or may share sanitation facilities with the existing structure.

Accessory dwelling units are also permitted on existing multifamily residential projects. State regulations also changed to allow property owners to convert existing garages and structures into ADUs and the County allows this change. Each ADU is required to have a separate address.

Accessory dwelling units serve to augment resources for senior housing, or other low- and moderate-income segments of the population. The development standards are reasonable to ensure neighborhood compatibility, and with the proposed amendment, will not present an unreasonable constraint to development.

In July 2020, the County's Comprehensive Zoning Code was updated in accordance with the October 2019 passage of California Assembly Bill AB 68 (AB 68), Assembly Bill 881 (AB 881), Assembly Bill 587 (AB 587), Assembly Bill 671 (AB 671), and Senate Bill 13 (SB 13). The provisions encourage the development of ADUs by making the process less restrictive for homeowners.

As of November 27, 2023, the County of Orange has issued a total of 235 ADU permits (ADU and JADUs included) in Unincorporated areas since 2020. **Table 2-36** below includes a breakdown of permits issued by the County starting in 2020 to November 2023.

Table 2-36
Issued ADU/JADU Permits 2020-2023

Unincorporated Areas	Year			
	2020	2021	2022	2023
Anaheim	9	18	22	16
Coto de Caza	0	1	0	2
Garden Grove	2	0	0	1
Ladera Ranch	1	1	1	0
Midway City	15	8	6	14
North Tustin	7	3	7	6
Orange	4	4	4	8
Rossmoor	2	7	2	4
Santa Ana	9	16	18	15
Silverado	0	1	0	0
Trabuco Canyon	0	1	0	0
Year Total	49	60	60	66
Total All Years	235			

Source: OC Development Services, November 2023

State mandates, the Comprehensive Zoning Code update, pre-approved ADUs plans, and permitting demonstrate an upward trend for ADU development within the County. The continued development of ADUs and JADUs offers another opportunity to address the need for additional very low-, low-, and moderate-income rental housing. This coincides with statewide trends showing an increase in the issuance of ADU or JADU permits since ADUs were first authorized for ministerial approval by state legislation in 2016.

Other Housing Choices:

Mobile Homes/Manufactured Housing

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

In accordance with zoning regulations, the County has determined that like single-family homes, mobile homes and manufactured housing are principally permitted in all residential zones. The number of mobile home or manufactured dwelling units permitted, as well as minimum setback

requirements, are the same as the maximum number of dwelling units and setback requirements permitted by the applicable district regulations. Off-street parking is consistent with the regulations found above, except as follows: Two (2) parking spaces for each mobile home dwelling unit; and one (1) parking space for each four (4) mobile home units to allow for additional guest parking.

Also, there are additional screening and landscaping requirements, and supplemental design criteria for mobile or manufactured home developments. The approving authority may grant exceptions if special circumstances are warranted, or if the requirements become excessive when applied to a specific development.

Boarding Houses

Boarding Houses are allowed by-right (6 or fewer residents) in multifamily residential districts or subject to a Use Permit (more than 6 residents) in the R-3 (apartment) district.

Single Room Occupancy (SRO)

In addition, the County Zoning Code permits the construction of Single Room Occupancy (SRO) facilities in any district where hotels are permitted, subject to approval of a Use Permit. These regulations facilitate the development or conversion of facilities to serve those in need of emergency shelter by expanding the geographic area where suitable facilities may be built and requiring only those conditions that are reasonably necessary to foster sound planning and neighborhood compatibility. The conditions and development standards that are applied to these facilities are no stricter than those for conventional hotel or motel developments.

One SRO-type facility has been built in the Unincorporated areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Future Growth Needs

Overview of the Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is a key tool for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for each planning period. The current planning period is from 2021 to 2029. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

Table 2-37 provides population projections through 2040 for Unincorporated Orange County, as calculated by the Southern California Association of Governments 2016-2040 Regional Growth Forecast. Despite the population of Unincorporated Orange County shrinking by nearly one-quarter, the population of the Unincorporated areas is forecasted to grow by 49.2 %. In comparison, the population of Orange County as a whole is forecasted to grow by only 12.7 %. Population growth is one factor that informs the need for housing in the Unincorporated areas.

Table 2-37
Population Growth Forecast (2012-2040)

Jurisdiction	2012	2020	2035	2040	% Change 2012-2040	Average Annual Growth Rate
Unincorporated Areas	121,160	128,421 +6%	177,900 +38.5%	180,100 +1.2%	48.6%	1.7%
County Total	3,010,232	3,180,491 +5.6%	3,499,000 +10%	3,535,000 +1%	17.4%	0.6%

Source: SCAG 2016-2040 RTP/SCS Final Regional Growth Forecast by Jurisdiction Report

The current RHNA Allocation Plan was adopted by the Southern California Association of Governments (SCAG) in March 2021. The future need for housing is determined primarily by the forecasted growth in households in a community. Each new household, created by a child moving out of a parent's home, by a family moving to a community for employment, and so forth, creates the need for a housing unit. The housing need for new households is then adjusted to maintain a desirable level of vacancy to promote housing choice and mobility.

SCAG must take into consideration the following factors:

- Market demand for housing.
- Employment opportunities.
- Availability of suitable sites and public facilities.
- Commuting patterns.
- Type and tenure of housing.
- Loss of units in assisted housing developments.
- Over-concentration of lower-income households.
- Geological and topographical constraints.

An adjustment is also made to account for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors – household growth, vacancy need, and replacement need – determines the construction need for a community. Total housing need is then distributed among four income categories on the basis of the County's

income distribution, with adjustments to avoid an over-concentration of lower-income households in any community.

2021-2029 Growth Needs

The total housing growth need for Unincorporated Orange County during the 2021-2029 planning period is 10,406 units. This total is distributed by income category as shown in **Table 2-38.** Of the 3,139 extremely low- and very low-income unit growth need, half (1,570 units) are estimated to be needed for extremely low-income households during the planning period, as provided by state law.

Table 2-38
Regional Housing Growth Needs – Unincorporated Orange County

Extremely Low	Very Low	Low	Moderate	Above Mod	Total
1,570 units	1,569 units	1,866 units	2,040 units	3,361 units	10,406 units
15.1%	15.1%	17.9%	19.6%	32.3%	100%
Source: SCAG 2021					

A discussion of the County's capacity to accommodate this growth need is provided in **Appendix B, Land Inventory**.

Special Housing Needs

State Housing Law requires that the special needs of certain disadvantaged groups be addressed. These households typically experience difficulty in securing decent, affordable housing, and are not well guarded under market conditions. Many of these groups also fall under the category of extremely low-income households. The needs of the elderly, handicapped, large families, female heads of household, people experiencing homelessness, and farm workers are addressed below:

Extremely Low-Income Households

The HUD Comprehensive Housing Affordability Strategy (CHAS) provides data only on a countywide basis and does not disaggregate it to the jurisdictional level, but data was available for the Unincorporated CDPs (this does not represent all of the Unincorporated areas). **Tables 2-39 and 2-40** below include data characterizing affordability and cost burden and housing problems aside from cost burden for all income groups within Orange County.

Of the extremely low-income households living in Orange County, 122,605 have at least one of the four housing problems (80.4%). The housing problems identified by CHAS include the following:

- Units with physical defects (lacking a complete kitchen or plumbing facilities).
- Overcrowded conditions (housing units with more than one person per bedroom).

- Housing cost burdens exceeding 30% of gross income (including utilities).

Severe housing problems include units with physical defects and overcrowded conditions, as well as more than 1.5 person per bedroom and a cost burden greater than 50%.

Table 2-39
Housing Problems for all Households by Tenure – Unincorporated CDPs

Income by Housing Problem	Household Has at Least 1 of 4 Housing Problems	Household Has None of the 4 Housing Problems or Cost Burden Not Available
Owners		
Less-than or = 30%	850	530
>30% to less-than or = 50% MFI	890	500
>50% to less-than or = 80% MFI	1,625	905
>80% to less-than or = 100% MFI	1,020	715
>100% MFI	2,585	14,200
Total	**6,960**	**16,855**
Renters		
Less-than or = 30%	1,375	415
>30% to less-than or = 50% MFI	755	20
>50% to less-than or = 80% MFI	835	360
>80% to less-than or = 100% MFI	290	324
>100% MFI	185	1,570
Total	**3,430**	**2,695**

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Table 2-40
Housing Problems for all Households by Tenure – Orange County

Income by Housing Problem	Household Has at Least 1 of 4 Housing Problems	Household Has None of the 4 Housing Problems or Cost Burden Not Available
Owners		
Less-than or = 30%	43,745	16,500
>30% to less-than or = 50% MFI	35,095	24,770
>50% to less-than or = 80% MFI	50,045	48,165
>80% to less-than or = 100% MFI	25,385	40,345
>100% MFI	41,810	269,410
Total	**196,080**	**399,190**
Renters		
Less-than or = 30%	95,460	18,910
>30% to less-than or = 50% MFI	74,070	6,800
>50% to less-than or = 80% MFI	64,900	32,070
>80% to less-than or = 100% MFI	16,745	28,610
>100% MFI	12,280	92,375
Total	**263,450**	**178,770**

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

Tables 2-39 and **2-40** demonstrate that 12% of homeowners in the Unincorporated CDPs and 22% in Orange County as a whole earning less than 30% of MFI have at least one housing problem. For renters, the issues are more severe, with 40% of renters in Unincorporated CDPs and 36% in Orange County as a whole earning less than 30% MFI having at least one housing problem. Based on this data, renters could use housing assistance in the Unincorporated CDPs.

Projected Needs

To calculate projected housing need, the County assumes 50% of its very low-income regional housing need is extremely low-income households.

Table 2- 41
Progress Towards Meeting New Housing Need
Unincorporated Orange County 2021-2029

	Extremely Low Income	Very Low	Low*	Moderate*	Above Moderate	Total
Total RHNA 2021-2029	1,570	1,569	1,866	2,040	3,361	10,406
Total Completed Units 10/16/2021 - 12/31/2022	-	21	48	0	325	394
Remaining Units Needed 2021-2029	1,570	1,548	1,818	2,040	3,036	10,012

Source: SCAG RHNA and the County of Orange/OC Development Services, 2023

Available resources to address extremely, very low, and low-income household include, The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs. See Sections 4 and 5 for further details on these programs. The Housing Action Plan addresses the needs of extremely low-income households. However, it must be recognized that the development of new housing for the lowest income groups typically requires large public subsidies, and the level of need is greater than can be met due to funding limitations, especially during these times of declining public revenues.

Elderly Persons

The large demographic group known as "Baby Boomers" born between 1946 and 1964 have played a dominant role in society throughout their lives. The oldest of the Boomers turned 75 in 2021 and the youngest of this group will turn 60 in 2024. The growing wave of elderly retirees will have a huge impact on government, health care and the housing market.

The special housing needs of seniors are an important concern in Orange County. This is especially so since many retired persons are likely to be on fixed, low incomes and at greater risk of housing overpayment. In addition, the elderly have special needs related to housing construction and location. Seniors often require ramps, handrails, lower cupboards, and counters to allow greater access and mobility. In terms of location, because of limited mobility the elderly also typically need access to public facilities (e.g., medical and shopping) and public transit facilities.

Senior citizens also may need special security devices for their homes to allow greater self-protection. In many instances, the elderly prefer to stay in their own dwellings rather than relocate to a retirement community and may require assistance with home repairs and manual

house/yard work. In general, every effort should be made to maintain the dignity, self-respect, and quality of life of senior residents in the County.

Finding reliable transportation to medical appointments, senior centers, meal sites, and shopping remains a serious problem for seniors. Many seniors lack private transportation due to physical or financial limitations.

According to recent American Community Survey estimates, there were 27.4% of owner households and 16.3% of renter households in Unincorporated Orange County where the householder was 65 or older (**Table 2-42**). Many elderly persons are dependent on fixed incomes and/or have a disability. Elderly homeowners may be physically unable to maintain their homes or cope with living alone. The housing needs of this group can be addressed through smaller units, accessory dwelling units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs (see also Section 3 – Constraints for more information on how the County's land use regulations help to facilitate these types of housing options for seniors).

Table 2-42
Elderly Households by Tenure (Owner vs. Renter) - Unincorporated Orange County

	Owners		Renters	
Householder Age	**Households**	**%**	**Households**	**%**
Under 65 years	23,431	72.6%	7,825	83.7%
65 to 74 years	5,332	16.5%	839	9.0%
75 to 84 years	2,372	7.4%	498	5.3%
85 and over	1128	3.5%	192	2.1%
Total 65+ Households	**8,832**	**27.4%**	**1,529**	**16.3%**
Total Unincorporated households	32,263	100.0%	9,354	100.0%

Source: SCAG Local Housing Data Pre-Certified Local Housing Data 2020

Housing for the Elderly

Senior housing projects are a permitted use by right within any residential zoning district. The Zoning Code also provides a density bonus for the construction of senior housing projects. The Zoning Ordinance is not considered to be a constraint to the development of senior housing because the regulations are the same as for other residential uses in the same districts.

Large Families

Household size is an indicator of the need for large units. Large households are defined as those with five or more members. Among both owners and renters, just under half of all Unincorporated area households have only one or two members. About 16% of renter households and about 15% of owner households had five or more members (**Table 2-43**). This

data, together with overcrowding statistics, indicates that although a large proportion of households are small, there is a significant need for large rental units with four or more bedrooms.

Table 2-43
Household Size by Tenure (Owner vs. Renter)
Unincorporated Orange County

	Owners		Renters	
Household Size	Households	%	Households	%
1 person	3,878	12.0%	1,708	18.3%
2 persons	11,293	35.0%	2,457	26.3%
3 persons	5,734	17.8%	2,055	22%
4 persons	6,716	20.8%	1,656	17.7%
5 persons	2,985	9.3%	918	9.8%
6 persons	1,018	3.2%	355	3.8%
7+ persons	639	2%	205	2.2%
Total households	32,263	100%	9,354	100%

Source: American Community Survey, 2014-2018, 5-Year Estimates

Single-Parent Households

Single parent households face different challenges due to the greater need for daycare services, health care services, and other services. An issue observed for female-headed households with no spouse present is a lower average income due to income inequalities present in workplaces.

As seen in **Table 2-44** below, for Orange County as a whole, single parents represent 16.8% of family households (owners and renters), according to 2019 ACS 5-Year Estimates. There are 119,719 single-mother households and 55,032 single-father households in Orange County (11.5% and 5.3%, respectively). In the Unincorporated CDPs, single parents represent 12.7% of family householders. There are 2,824 single-mother households and 966 single-father households (9.4% and 3.2%, respectively).

Female-Headed Households

The U.S. Census Bureau estimates that about 9% of owner households and 15% of renter households in Orange County as a whole, and approximately 7% of owner households and 18% of renter households in the Unincorporated CDPs were headed by a female (**Table 2-44**). In both Orange County as a whole and in the Unincorporated CDPs, female headed households are more common than male-headed households for both homeowners and renters. This data suggests that while female-households occur at a lower rate than married couple family households and non-family households, female-headed households occur at a higher rate than male-headed households, and that within the Unincorporated CDPs specifically, female-headed households

represent a higher proportion of renters than in Orange County as a whole, indicating that some of the rental demand within the Unincorporated areas is driven by female-headed households.

Table 2-44
Household Type by Tenure (Owner vs. Renter) Unincorporated CDPs and Orange County

Family Household Type	Unincorporated CDPs				Orange County			
	Owners		Renters		Owners		Renters	
	Households	%	Households	%	Households	%	Households	%
Married couple family	18,217	76.49%	2,962	48.38%	385,611	64.8%	183,649	41.5
Male householder, no spouse present, family	588	2.47%	378	6.17%	23,491	3.9%	31,541	7.1%
Female householder, no spouse present, family	1,698	7.13%	1,126	18.39%	51,654	8.7%	68,065	15.4%
Non-family households	3,313	13.91%	1,656	27.05%	134,516	22.6%	158,965	35.9%
Total households	23,816	100.00%	6,122	100.00%	595,272	100%	442,220	100%

Source: American Community Survey 5-Year Estimates, 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Students

The need for student housing is another significant factor affecting housing demand. Student housing often only produces a temporary housing need based on the duration of the educational institution enrolled in. The impact on housing demand is often increased in areas surrounding universities and colleges. According to 2019 American Community Survey 5-Year Estimates, there are approximately 231,636 students in Orange County enrolled in undergraduate programs and 48,691 enrolled in graduate or professional programs. Together, this makes up just under 33% of the population over 3 years of age enrolled in school. There are no local universities within Unincorporated Orange County; however, some of the units in the Unincorporated County may be utilized as student housing for local universities within neighboring jurisdictions. Students may seek shared housing situations to decrease expenses and can be assisted through roommate referral services offered on and off campus. College graduates provide a specialized pool of skilled labor that is vital to the economy; however, a lack of affordable housing may lead to their departure post-graduation.

Persons with Disabilities

Access and affordability are the two major housing needs of disabled persons. Physically disabled persons often require specially designed dwellings to permit access within the unit, as well as to and from a site. *California Administrative Code* Title 24 sets forth access and adaptability requirements for the physically handicapped (disabled). These regulations apply to all buildings such as motels, employee housing, factory-built housing, and privately funded, newly constructed apartment houses containing five or more dwelling units. The regulations also require that rampways, larger door widths, restroom modifications, etc. be designed to enable

free access by the handicapped. Such standards, however, are not mandatory for new single-family residential construction.

Table 2-45
Persons with Disabilities by Age and Type
Orange County

Disability by Age	Persons	%
Age 5 to 17 – total persons	703,641	
Hearing difficulty	3,884	0.6%
Vision difficulty	3,363	0.5%
Cognitive difficulty	14,903	2.9%
Ambulatory difficulty	2,811	0.5%
Self-care difficulty	5,770	1.1%
Age 18 to 64 – total persons	1,998,667	
Hearing difficulty	22,495	1.1%
Vision difficulty	20,555	1.0%
Cognitive difficulty	48,383	2.4%
Ambulatory difficulty	46,589	2.3%
Self-care difficulty	20,493	1.0%
Independent living difficulty	41,021	2.1%
Age 65 and over – total persons	448,781	
Hearing difficulty	53,881	12.0%
Vision difficulty	22,610	5.0%
Cognitive difficulty	37,661	8.4%
Ambulatory difficulty	83,960	18.7%
Self-care difficulty	38,172	8.5%
Independent living difficulty	64,465	14.4%

Source: American Community Survey 5-Year Estimates 2019

Table 2-46
Persons with Disabilities by Age and Type
Unincorporated CDPs

Disability by Age	Persons with a Disability	%
Age 5-17 – Total Persons	**20,123**	
Hearing difficulty	113	0.56%
Vision difficulty	54	0.27%
Cognitive difficulty	649	3.23%
Ambulatory difficulty	41	0.20%
Self-care difficulty	101	0.50%
Age 18 to 64 – Total Persons	**53,448**	
Hearing difficulty	656	1.23%
Vision difficulty	642	1.20%
Cognitive difficulty	1,171	2.19%
Ambulatory difficulty	1,242	2.32%
Self-care difficulty	427	0.80%
Independent living difficulty	944	1.77%
Age 65 and over – Total Persons	**13,228**	
Hearing difficulty	1,439	10.88%
Vision difficulty	632	4.78%
Cognitive difficulty	1,042	7.88%
Ambulatory difficulty	1,942	14.68%
Self-care difficulty	819	6.19%
Independent living difficulty	1,869	14.13%

Source: American Community Survey 5-Year Estimates 2019
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

Disabled persons have special needs regarding location. There is typically a desire to be located near public facilities, and near public transportation facilities that provide service to those who rely on them.

Table 2-45 shows disability data for all of Orange County and **Table 2-46** shows disability data for Unincorporated CDPs. The data shows that in the under 65 age groups disabilities are relatively rare – typically approximately 2% or less of the population for all of Orange County and are similar in Unincorporated CDPs, with the exception of cognitive difficulties for the age group 5-17 in Unincorporated CDPs. However, among seniors the incidence of disabilities increases significantly. Nearly 18.7% of persons in this age group reported an ambulatory difficulty in all of Orange County and nearly 15%, in Unincorporated areas while more than 14%

had an independent living difficulty in all of Orange County and in Unincorporated CDPs. Members of this age group are frequently on fixed incomes or rely on public assistance.

Developmentally Disabled

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

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

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

The State of California Department of Developmental Services (DDS) provided community-based services to approximately 331,999 persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities, for fiscal year 2017 to 2018. The Regional Center of Orange County (RCOC) is one of 21 regional centers in the State of California that serves as a point of entry to services for people with developmental disabilities. The RCOC is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families. The goal of the RCOC is to help

Orange County residents with developmental disabilities and their families obtain local services and support to help them live safely and with dignity in the community.

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

Based in Orange County, the Dayle McIntosh Center for the Disabled, also referred to as DMC, is a non-profit organization that provides services to people with disabilities and facilitates equal access and inclusion within the community. The mission of the DMC (http://www.daylemc.org) is to advance the empowerment, equality, integration, and full participation of people with disabilities in the community. The DMC is a non-residential program, but instead promotes the full integration of persons with disabilities into the community, regardless of the disability, and aims to meet the standards and indicators established for operation of independent living centers in the federal Rehabilitation Act of 1973, as amended. The DMC is a peer-based organization meaning that most of the staff is composed of individuals who have disabilities themselves and have met the challenge of becoming self-sufficient. Its staff and board are composed of over 50% of people with disabilities. Its two offices, located in Anaheim and Laguna Hills, serve over 500,000 people with disabilities in Orange County and surrounding areas. The County housing programs and regulations facilitate the provision of special needs housing such as emergency shelters and transitional housing, permanent supportive housing, assisted living and group homes to serve the needs of persons with developmental disabilities.

Homelessness

Throughout the country, homelessness is a serious problem. Factors contributing to homelessness include: the general shortage of housing affordable to extremely low- to moderate-income households; increases in the number of persons whose incomes fall below the poverty level; reductions in public subsidies and benefits; de-institutionalization of the mentally ill; criminal justice system reforms at the federal and state level; and most recently the impacts of the COVID-19 pandemic.

Profiles of the Homeless Population in Orange County

The Orange County Health Care Agency (HCA) serves as the administrative entity for the Orange County Continuum of Care. As such, HCA undertakes a bi-annual "Point-in-Time" (PIT) count of the unsheltered homeless population in Orange County and an annual count of the sheltered population as part of its application for homeless assistance grant funds to U.S. Department of Housing and Urban Development (HUD) and State of California grant funds. The most recent PIT survey for which results are available was conducted in January 2019[3]. That survey estimated that there were approximately 6,860 persons experiencing homelessness in Orange County at the time of the survey[4]. Of those, the survey estimated that 42% of persons experiencing homelessness were sheltered and 58% were unsheltered. The 2019 PIT survey results indicated an increase in the homeless population compared to the findings of the 2017 PIT Count. However, it is important to note that the 2019 PIT Count incorporated a change in methodology that allowed the unsheltered count to take place over two days to ensure the county was canvassed effectively and collected unique identifying data points to de-duplicate records. Additionally, the 2019 PIT Count incorporated the use of ESRI Survey123 mapping technology, a smartphone application that mapped the locations and city of origin where individuals experiencing homelessness were surveyed and which helped to facilitate survey data collection. The ESRI Survey123 application incorporated questions that collected demographic, subpopulation, and homelessness-related data as required by HUD.

By the very nature of homelessness, it is difficult to determine the location of homeless persons over an extended period of time. However, the incorporation of new technologies allowed for the 2019 PIT survey to enumerate persons experiencing unsheltered homelessness by jurisdiction, where traditionally this had only been captured for individual those in emergency shelters and transitional housing. The County released the results of the 2019 PIT Count broken down by household type, subpopulations, and jurisdictions. Using data from the 2019 PIT County, the County has estimated there were approximately 43 individuals experiencing homelessness in the Unincorporated areas, located in shelter programs and on the streets and in places not meant for human habitation. This represents less than one percent of the homeless population as counted during the 2019 PIT. Although this method probably understates the number of persons experiencing homelessness in the Unincorporated areas, since some service providers did not provide exact addresses to safeguard and protect the privacy of their clients, it is a methodology that has been used in previous County Housing Elements certified by HCD. This estimate of 53 persons is used for purposes of 2017 Senate Bill 2 (SB 2) analysis. Regardless of what methodology is used for estimating the location of the persons experiencing homelessness, this is a regional issue, and the County will continue to address it from a regional perspective.

[3] OC Health Care Agency received a waiver from HUD to forgo the 2021 unsheltered count due to the COVID-19 pandemic in an effort to safeguard the health of those most vulnerable and limit the spread of COVID-19 illness.

[4] 2019 Orange County Homeless Census & Survey, for OC Partnership by Focus Strategies

County Efforts to Address Homelessness

Senate Bill 2 (SB2) of 2007 requires that jurisdictions quantify the need for emergency shelter and determine whether existing facilities are adequate to serve the need of the homeless population. Under SB2, an emergency shelter is defined as "housing with minimal supportive services for persons experiencing homelessness that is limited to occupancy of six months or less by a person experiencing homelessness. On September 28, 2022, Governor Gavin Newsom approved California Assembly Bill 2339 (AB 2339), which amends the provisions of Government Code 65583 concerning emergency shelters. AB 2339 expanded the definition of emergency shelter to include "other interim interventions, including, but not limited to, a navigation center, bridge housing, and respite or recuperative care." The new requirements of AB 2339 apply to housing elements due to be revised pursuant to Section 65588 on or after January 1, 2021, thus, this Housing Element must comply with the new provisions. Under the revisions to Government Code section 65583(a)(4)(A), the County must identify "one or more zoning designations that allow residential uses, including mixed uses, where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit and that are suitable for residential uses." The County must identify zoning designations that have sufficient sites to meet the need for emergency shelter for the Unincorporated areas, which as identified above in the PIT survey, would need to accommodate 43 homeless persons.

Under Government Code Section 65583(a)(4)(F), as amended by AB 2339, "[a] local government can demonstrate, to the satisfaction of the department, the existence of one or more emergency shelters either within its jurisdiction or pursuant to a multijurisdictional agreement that can accommodate that jurisdiction's need and the needs of the other jurisdictions that are a part of the agreement for emergency shelter identified in paragraph (7) may comply with the zoning requirements of subparagraph (A) by identifying a zoning designation where new emergency shelters are allowed with a conditional use permit."

The County of Orange can accommodate the needs of homeless in the Unincorporated areas through the existence of the multijurisdictional shelters of Bridges at Kramer Place and the Yale Navigation Center. Moreover, the County's existing Zoning Code complies with the requirements of AB 2339, Government Code Section 65583(a)(4)(A), through compliance with subparagraph (a)(4)(F), by allowing emergency shelters and residential uses in industrial and commercial zones subject to a site development permit and objective site development standards. OCCO § 7-9-44, *et seq.*

The County's Zoning Code allows emergency shelters by-right in the Housing Opportunities Overlay Zone, made up of commercial and industrial zoning districts that allow residential uses. Transitional housing and permanent supportive housing are permitted as residential uses subject to the same standards as apply to other residential uses of the same type in the same zoning district in compliance with Government Code section 65583.

Since 1998, the County of Orange (County) has had a comprehensive, coordinated, and regional strategy to address homelessness. This strategy has included the Orange County Continuum of Care (CoC) that includes participation of all 34 cities in Orange County, County Departments, the County's homeless housing and service providers, and other community groups, including non-profits, local governmental agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools and other stakeholders to identify the gaps and unmet needs of the persons experiencing homelessness in Orange County.

In May 2016, the County established the Office of Care Coordination located in the County Executive Office. The Office of Care Coordination engages across Orange County, working with cities and community-based organizations to strengthen regional capacity and multi-city, multi-sector investments to prevent and address homelessness, coordinate public and private resources to meet the needs of the homeless population in Orange County and promote integration of services throughout the community that improve the countywide response to homelessness.

In October 2016, the Office of Care Coordination produced an Assessment of Homeless Services in Orange County. The assessment outlines eight key findings, 26 recommendations in five focused areas and next steps for Orange County to improve the existing homeless service system and promote successful outcomes for people experiencing homelessness. For the following two years, the Office of Care Coordination made significant progress in the implementation of the recommendations and started to focus on understanding the intersectionality between homelessness and the various components of the System of Care.

In April 2018, the Office of Care Coordination presented an update on the Assessment of Homeless Services in Orange County and Building the County's System of Care that is integrated and regional to meet the unique needs of the people experiencing homelessness in our community. The County's System of Care focused on expanding capacity and developing new services and programming that better met the needs of people at risk of homelessness and experiencing homelessness. This included the implementation of the Restaurant Meals program, the Whole Person Care pilot program to expand housing navigation, disability benefit assistance through SOAR, and much more.

Additionally, the Assessment of Homeless Services provided the framework and infrastructure that the County has continued to build upon to ensure that all components of the System of Care are available and well-coordinated. The five components of the System of Care are Behavioral Health, Healthcare, Community Corrections, Housing, and Benefits and Support Services, which involve several County Departments in the ongoing response to homelessness.

The Office of Care Coordination staffs and facilitates the Commission to End Homelessness established in 2018. The Commission works in collaboration with the County government, 34 city governments, business sector, philanthropic organizations, community organizations, faith-based organizations, health care, public safety, and other interested stakeholders to promote an effective response to homelessness within Orange County. The Director of Care Coordination

works with commission members to focus on regional policy and implementation strategies, affordable housing development, data and gaps analysis, best practice research, social policy, and systemic change.

In October 2022, the Commission to End Homelessness presented the Homeless Service System Pillars Report to the Board of Supervisors. The Homeless Service System Pillars Report resulted from an analysis of the Homeless Service System through a four-pillar framework: Prevention, Outreach and Supportive Services, Shelter, and Housing. The Homeless Service System Pillars Report yielded a definition, set of goals, best practices and guiding principles for each pillar and will help ensure that best practices, guiding principles and commitments are incorporated into both the Office of Care Coordination and County department's programming to align and establish consistent service delivery across the County.

The Office of Care Coordination also serves as the Collaborative Applicant and Administrative Entity of the Orange County CoC. The Orange County CoC has a 19-member Board that supports the local planning to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness. has a number of committees aimed at coordinating and collaborating on specific functions and programs associated with the Continuum of Care Program. The committees contribute to the ongoing planning, coordination, and collaboration of homeless services and programs to address the needs of individuals and families experiencing homelessness and preventing homelessness.

- The **Policies, Procedures and Standards Committee**[5] was created to continuously review and advise the CoC Board on items related to the governing and committee structures, operational guidelines, decision-making protocols, appointment processes and other matters related to policies, procedures and standards related to the conduct and operation of the Orange County CoC and the CoC Board. This includes designating and assigning tasks to workgroups and ad hoc groups to improve project performance, assessments, and policies.
- The **CES Steering Committee**[6] was created to continuously review and advise the CoC Board and Policies, Procedures and Standards (PPS) Committee on items related to the policies, procedures, and operation of the CES in Orange County. The CES Committee will support the CoC Board with policy development,

[5] Policies, Procedures and Standards Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Policies%20Procedures%20and%20Standards%20Charter.pdf

[6] Coordinated Entry System Steering Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Coordinated%20Entry%20System%20Steering%20Committee%20Charter.pdf

supporting strategic implementation of the CES and evaluating the efficiency and effectiveness of CES.

- The **Housing Opportunities Committee**[7] is to identify, coordinate and evaluate housing opportunities for people experiencing homelessness in the Orange County CoC. The Housing Opportunities Committee fulfills this goal by coordinating information and resources amongst regional housing providers, identifying gaps in affordable and permanent supportive housing, and supporting the creation of more housing opportunities in coordination with affordable housing developers, homeless service providers, cities, and Public Housing Authorities. The mission of the Housing Opportunities Committee is to provide more housing opportunities for people experiencing homelessness in Orange County.
- The **Orange County Service Provider Forum**[8] was created to convene the CoC General Membership semiannually, recruit additional members for the Orange County CoC and promote information and resource sharing for service providers and community partners working on the frontlines of the homeless response system.
- The **Transitional Aged Youth Collaborative Committee**[9] was created to coordinate services, enhance collaboration, and recommend best practices for TAY experiencing homelessness in Orange County. This includes recommending policies, procedures and sharing input on improving the quality and types of services provided to the Orange County CoC Board.
- The **Veterans Committee**[10] was created to ensuring that the CoC is actively working to prevent, reduce, and end homelessness for veterans, and measuring progress on these efforts. The Veterans Committee aligns with the intent of ensuring that the CoC is actively working to prevent, reduce, and end homelessness for veterans, and measuring progress on these efforts. The Veterans Committee will provide leadership on the issue of veteran homelessness and

[7] Housing Opportunities Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Housing%20Opportunities%20Charter.pdf
[8] Service Provider Forum Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Service%20Provider%20Forum%20Governance%20Charter.pdf
[9] Transitional Aged Youth Collaborative Committee - https://ceo.ocgov.com/sites/ceo/files/2023-02/TAY%20Collaborative%20Charter.pdf
[10] Veterans Committee Governance Charter - https://ceo.ocgov.com/sites/ceo/files/2023-02/Veterans%20Committee%20Governance%20Charter.pdf

coordinate efforts to better serve veterans and their families in becoming permanently housed and achieving housing stability.

The County serves as the Coordinated Entry System (CES[11]) Lead for the Orange County CoC and is responsible for the implementation of a CES that address the needs of persons experiencing homelessness in Orange County, including adult only households, families with minor children, veterans, and Transitional Aged Youth. The primary goal of CES is to facilitate a participant-centered process that streamlines access to the most appropriate services and housing interventions for individuals experiencing homelessness or at risk of experiencing homelessness in Orange County. The CES aims to meet individualized preferences and needs with the goal of supporting participants return to stable housing. Persons experiencing homelessness and at risk of experiencing homelessness gain access to housing and supportive services more seamlessly through regionally coordinated access. The County has widely adopted the utilization of the CES to prioritize emergency shelter, interim housing, permanent housing, and supportive services.

Homeless needs and priorities continue to be identified through the Orange County CoC system. All CoC committees are public and inclusive of the participation of all stakeholders including homeless and formerly homeless individuals. In addition, the CoC consults with and engages homeless individuals to participate in the Point-in-Time Count and Survey of the homeless and the various committees and subcommittees of the CoC to address the emergency shelter and transitional housing needs of homeless persons. Most recently, the Orange County CoC established a Lived Experience Advisory Committee to ensure that the voices and perspectives of individuals with current and/or past lived experience of homelessness are heard and considered in the decision-making process of the CoC Board and provide a way to share recommendations and feedback on the CoC's programs and services. The CoC aims to build a diverse and inclusive Committees and as such is currently actively recruiting members for the various Committee.

The Homeless System of Care is established to create and provide services to those experiencing homelessness by working collaboratively with a variety of supportive services that can address the current needs and barriers with a goal of self-sufficiency and a permanent home. The system also aims to prevent recurring episodes of homelessness by ensuring individuals are connected to wrap around services and community services. In Orange County, a variety of private, federal, state, and county-funded programs offer job training courses, childcare, work appropriate clothing, food donations and/or meals, among other services. Many of these services are aimed to follow clients. The County of Orange continues to work on addressing and reducing homelessness countywide. Part of the implementation of programs established to serve the population is setting goals and meeting milestones to track progress. As such, the County of

[11] Coordinated Entry System - https://ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system

Orange in partnership with the Orange County CoC have developed a Local Homelessness Action Plan[12], which includes:

- Landscape Analysis of Needs
- Demographics, and Funding
- Analysis of People Being Served by the Homeless Service System
- Outcome Goals and Strategies to meet Outcome Goals
    - Reducing the number of persons experiencing homelessness.
    - Reducing the number of persons experiencing homelessness on a daily basis.
    - Reducing the number of persons who became newly homeless.
    - Increasing the number of people exiting homelessness into permanent housing.
    - Reducing the length of time persons remain homeless. Reducing the number of persons who return to homelessness within two years after exiting homelessness to permanent housing.
    - Increasing successful placements from street outreach.
- Funding Plans and Priorities that support the outcome goals and address needs and gaps within the homeless response system

Emergency Shelters, Transitional Housing, and Supportive Housing

Emergency shelters are facilities that provide a safe alternative to the streets either in a shelter facility, or through the use of motel vouchers. Emergency shelter stays are short-term, usually for six months or less. Transitional housing is longer-term emergency housing, typically six months up to two years with the goal of participants transitioning to permanent housing upon program exit. Transitional housing requires that the resident participate in a structured program to work toward the established goals so that they can move on to permanent housing. Participants are often provided with an array of supportive services to assist them in meeting goals. Supportive Housing is longer term permanent housing that provides supportive services to ensure housing stability for participants.

It should be recognized that most of the homeless population (as well as the services needed by these individuals) are found in the urbanized core of the county, most of which is within incorporated cities. This pattern continues as Unincorporated land is annexed or incorporated

[12] Local Homeless Action Plan as submitted in HHAP Round 4 application - https://bcsh.ca.gov/calich/documents/hhap_round4/counties/orange.pdf

into new cities. Therefore, it is appropriate that most of the facilities for this population are also located in the cities. As with other categories of housing assistance, OC Community Resources takes a broad perspective that includes more than just the Unincorporated areas, and many housing programs and affordable housing developments located in cities have been assisted by the County in recent years (see **Table A-2** in Appendix A).

SB 2 (2007) strengthened the planning requirements for emergency shelters and transitional/supportive housing. The bill requires jurisdictions to evaluate their needs for shelters compared to available facilities to address the need. Jurisdictions must also designate at least one location where a year-round shelter can be accommodated. It is estimated that the need for emergency shelter beds in the Unincorporated areas is for approximately 53 persons (see discussion in Section 2 – Community Profile and Needs). In order to encourage and facilitate the establishment of additional facilities, the Zoning Code amendment to allow shelters by-right in the commercial and industrial portions of the Housing Opportunities Overlay Zone was adopted by the Board of Supervisors in 2013.

There are approximately 153 acres of commercial and industrial zones eligible for by-right emergency shelter development under the Housing Opportunities Overlay Zone. According to the OC Housing Opportunities Manual, an emergency shelter or multi-service center shall comply with the site development standards of the base district. In the event of a conflict between the base district regulations and these standards, the provisions of section 7-9-44 shall control. The following lists standards and requirements for emergency shelters:

- A Management and Operations Plan shall be submitted for review and approval prior to operation of the emergency shelter or multi-service center.
- The Management and Operations Plan shall be in compliance with the provisions of the Orange County Housing Opportunities Manual.
- No facility shall be permitted less than 300 feet from another emergency shelter or multi-service center, measured from the nearest property lines.
- Emergency shelters may have a maximum of fifty (50) beds. Larger emergency shelters, up to a maximum of 150 beds, may be permitted subject to approval of a Use Permit per section 7-9-125.
- Off-street parking shall be provided at a rate of one (1) space per four (4) beds, plus one (1) space for each staff person (paid or volunteer) on duty.
- Bike racks shall be provided on site for use by staff and clients.
- An emergency shelter or multi-service center shall be open 24 hours a day unless an exemption is granted.
- Maximum consecutive length of stay shall be 180 days.

Low Barrier Navigation Centers

California Assembly Bill 101 (AB 101) states that "The Legislature finds and declares that Low Barrier Navigation Center developments are essential tools for alleviating the homelessness crisis in this state and are a matter of statewide concern-." Low Barrier Navigation Centers are defined as a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. Low Barrier Navigation Centers are required as a use by-right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. On September 27, 2022, the Orange County Zoning Code was amended to comply with State regulations on Low Barrier Navigation Centers (AB 101) to ensure Low Barrier Navigation Centers are allowed by-right in all zones that permit mixed-uses and non-residential uses. The existing Bridges at Kraemer Place and Yale Navigation Center both meet the criteria of Low Barrier Navigation Centers, as described above.

Inventory of Homeless Facilities

The facility and service need of families and individuals experiencing homelessness generally include emergency shelter, transitional housing, permanent supportive housing, and supportive services such as job training and counseling, behavioral and general health services.

Emergency shelters often provide accommodation for a few days up to six months. Transitional housing provides shelter for an extended period of time (as long as 24 months) and generally includes integration with other social services and counseling programs that assist people in increasing their income and securing long-term housing. Permanent supportive housing is rental housing for low-income or people experiencing homelessness in addition to a long-term disabling condition such as severe mental illness, substance abuse disorder, or HIV/AIDS with accompanying supportive services that also further self-sufficiency and housing stability. In Orange County, permanent supportive housing is prioritized for individuals who are experiencing chronic homelessness, which is defined as being homeless for a year or longer continuously, or on three separate occasions totaling 12 months, and having a long-term disabling condition.

The landscape of homeless services has changed significantly in Orange County since 2016, as the County and City jurisdictions have made significant investments in the development of emergency shelter, affordable housing, and permanent supportive housing programs to address the needs of individuals and families experiencing homelessness. As of January 2021, a network of nonprofit organizations and local governments operates 59 emergency shelter programs (including those operating in response to COVID-19), 42 transitional housing programs, and 31 permanent supportive housing programs within Orange County. Specifically, the County, individual jurisdictions, and numerous agencies oversee a total of 2,857 beds in emergency

shelters (**Table 2-47**), 899 beds in transitional housing shelters (**Table 2-48**) and 2,602 beds in permanent supportive housing settings (**Table 2-49**). Currently, 646 permanent supportive housing and affordable housing units are under development.

Unlike cities, the County plays a regional role in providing services to persons and families experiencing homelessness. The County-contracted facilities, such Bridges at Kraemer Place and the Yale Navigation Center that provides emergency shelter for adults experiencing homelessness, is located outside of the County's jurisdictional boundary but serves individuals from throughout the County, including the Unincorporated areas. In addition, the Orange County Office of Care Coordination coordinates the grant application process through which local homeless service providers receive over $23 million in federal funding annually for the Continuum of Care Program. The Orange County Office of Care Coordination also serves as the administrative entity for the Orange County Continuum of Care for State funding to address homelessness.

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children
1736 Family Crisis Center	SSVF EHA	C	NA	0	0	0
American Family Housing	Stanton Inn	C	NA	0	70	0
American Family Housing	Tahiti Motel Operations	U	NA	0	58	0
American Family Housing	Washington House	C	NA	0	16	0
Build Futures	Emergency Housing for Youth	C	NA	0	0	0
Casa Teresa	Emergency Maternity Shelter	C	NA	6	11	0
Casa Youth Shelter	Basic Center Group	C	NA	0	0	12
City Net	Santa Ana Armory	C	NA	0	0	0
CoC FEMA	CoC-Funded FEMA COVID-19	C	NA	0	0	0
Colette's Children's Home	Placentia Hope Emergency Shelter	C	NA	12	0	0
Family Assistance Ministries	Family House	C	NA	32	0	0
Family Assistance Ministries	Gilchrist House – Families	C	NA	9	0	0
Family Assistance Ministries	Project Room Key	C	NA	0	0	0
Friendship Shelter	Alternate Sleeping Location	C	NA	0	30	0
Friendship Shelter	Alternative Sleeping Location Drop-Offs	C	NA	0	0	0
Friendship Shelter	Bridge Housing Program	C	NA	0	28	0
Friendship Shelter	Safe Spaces	C	NA	0	2	0
Grandma's House of Hope	Bridge Re-Entry	C	NA	0	12	0
Grandma's House of Hope	Emergency Shelter CESH	C	NA	0	13	0
Grandma's House of Hope	Women's Emergency Shelter	C	NA	0	25	0
Human Options	Family Healing Center	C	DV	16	0	0
Human Options	Human Options Emergency Shelter	C	DV	29	0	0
Illumination Foundation	Fullerton Navigation Center	U	NA	0	90	0

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children
Illumination Foundation	Gilbert House	C	NA	15	0	0
Illumination Foundation	La Mesa Emergency Shelter	C	NA	12	90	0
Illumination Foundation	Murphy House	C	NA	28	0	0
Illumination Foundation	Recuperative Care Program - Broadway	U	NA	0	62	0
Illumination Foundation	Recuperative Care Program - MIDWAY	C	NA	0	30	0
Illumination Foundation	Temporary Isolation Shelter - Orange/Anaheim	C	NA	0	0	0
Illumination Foundation	The Link	C	NA	40	160	0
Illumination Foundation	Theriault House	C	NA	36	0	0
Interval House	Emergency Shelter	C	DV	68	3	0
Jamboree	Anaheim House	C	NA	0	6	0
Laura's House	Laura's Domestic Violence Emergency	C	DV	18	2	0
Mercy House	Bridges at Kramer Place	C	NA	0	142	0
Mercy House	Buena Park Emergency Shelter	C	NA	0	103	0
Mercy House	Costa Mesa Bridge Shelter	C	NA	0	29	0
Mercy House	Family Care Center	C	NA	36	0	0
Mercy House	FEMA - Costa Mesa	C	NA	0	0	0
Mercy House	FEMA - Santa Ana	C	NA	0	0	0
Mercy House	Huntington Beach Navigation Center	C	NA	0	124	0
Orange County Rescue Mission	ES Village of Hope	C	NA	33	33	0
Orange County Rescue Mission	Tustin Temporary Emergency Shelter	C	NA	9	48	0
PATH	Placentia Navigation Center	C	NA	0	100	0
PATH	Yale Navigation Center	U	NA	0	425	0
Pathways of Hope	New Vista Emergency	C	NA	44	0	0
Pathways of Hope	Via Esperanza	C	NA	45	0	0
Precious Life Shelter	Emergency Shelter	C	NA	0	6	0
Radiant Health Centers	Short Term Supportive Housing	C	HIV	0	0	0
Salvation Army	Anaheim Emergency Shelter	C	NA	0	325	0
Salvation Army	Salvation Army - FEMA Project	C	NA	0	28	0
The Eli Home	The Eli Home CARP Residential Recovery Shelter Program	C	DV	18	0	0
The Midnight Mission	Courtyard in OC	C	NA	0	238	0
US Veterans Initiatives	SSVF EHA	C	NA	0	0	0
Volunteers of America	SSVF EHA	C	NA	0	0	0
Waymakers	Huntington Beach Youth Shelter	C	NA	0	0	4
WISEPlace	Safe Place	C	NA	0	30	0
Women's Transitional Living Center	45 Day Emergency Shelter	C	DV	37	0	0
Women's Transitional Living Center	Safety Net	C	DV	3	3	0

Table 2-47
Emergency Shelter Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

Table 2-48
Transitional Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds
Build Futures	Emergency Housing for Youth	C	NA	0	0	0	0
Casa Teresa	Casa Teresa Parenting Program	C	NA	0	14	0	14
Casa Teresa	Casa Teresa Transformation I Program	C	NA	4	0	0	4
Casa Teresa	Casa Teresa Transformation II Program	C	NA	5	0	0	5
Colette's Children's Home	CCH Ariel Place/Anaheim	C	NA	9	0	0	9
Colette's Children's Home	CCH Cypress Street #2/Placentia	C	NA	8	2	0	10
Colette's Children's Home	Colette's Children's Home #1	C	NA	12	2	0	14
Colette's Children's Home	Colette's Children's Home #2	C	NA	12	1	0	13
Colette's Children's Home	Colette's Children's Home #3	C	NA	9	0	0	9
Colette's Children's Home	Cypress/Placentia III	C	NA	9	0	0	9
Colette's Children's Home	Dairyview	C	NA	12	2	0	14
Families Forward	I-Transitional Housing - Irvine	C	NA	4	0	0	4
Families Forward	I-Transitional Housing- Lake Forest	C	NA	12	0	0	12
Family Assistance Ministries	Gilchrist House - Individuals	C	NA	0	8	0	8
Grandma's House of Hope	GHH Men's Recovery Residence	C	NA	0	13	0	13
Grandma's House of Hope	GHH Men's Transitional Short Term Housing	C	NA	0	6	0	6
Grandma's House of Hope	Healing House	C	NA	0	12	0	12
Grandma's House of Hope	Men's Bridge	C	NA	0	10	0	10
Grandma's House of Hope	VOCA XH	C	NA	0	11	0	11
Grandma's House of Hope	Women's Bridge	C	NA	0	20	0	20
HIS House	CHESS - TAY	C	NA	0	14	0	14
HIS House	HIS House Transitional	C	NA	48	0	0	48
Human Options	Second Step	C	DV	48	0	0	48
Laura's House	Laura's Domestic Violence Transitional Housing Program	C	DV	7	0	0	8
Mary's Shelter	Transitional Living for Homeless Youth	C	NA	0		30	30
OC Gateway to Housing	Transitional Housing Program - Tustin	C	NA	28	0	0	28
OC Gateway to Housing	Transitional Housing Program- Santa Ana	C	NA	8	0	0	8
One Step Ministry	Our House	C	NA	9	0	0	9

Table 2-48
Transitional Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds
Orange County Rescue Mission	Hope Family Housing-Buena Park	C	NA	65	0	0	65
Orange County Rescue Mission	House of Hope	C	NA	45	0	0	45
Orange County Rescue Mission	TH Village of Hope	C	NA	98	98	0	196
Orange County Rescue Mission	Tustin Veteran's Outpost	C	NA	16	10	0	26
Precious Life Shelter	Transitional Program	C	NA	25	0	0	25
Salvation Army	Transitional Housing - Buena Park	C	NA	6	0	0	6
Salvation Army	Transitional Housing - Tustin	C	NA	9	0	0	9
South County Outreach	SCO Transitional Housing - Laguna Niguel	C	NA	3	0	0	3
South County Outreach	SCO Transitional Housing - Lake Forest	C	NA	21	0	0	21
South County Outreach	SCO Transitional Housing - Mission Viejo	C	NA	6	0	0	6
Thomas House	2nd Step	C	NA	12	0	0	12
Thomas House	Thomas House Homeless Family Shelter #10	C	NA	64	0	0	64
WISEPlace	Positive Steps House	C	NA	0	5	0	5
WISEPlace	Steps to Independence	C	NA	0	19	0	19
Women's Transitional Living Center	Transitional Housing	C	DV	7	0	0	7

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children
YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

Table 2-49
Permanent Supportive Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds	PIT Count	Total Beds
American Family Housing	Permanent Housing 2	C	NA	31	7	0	38	39	38
American Family Housing	Permanent Housing Collaborative	C	NA	36	8	0	44	40	44
Anaheim Supportive Housing	Tyrol Plaza	C	NA	0	12	0	12	12	12
Friendship Shelter	Henderson House Permanent Supportive Housing	C	NA	0	35	0	35	34	35
Illumination Foundation	SHP Stanton Multi-Service Center	C	NA	8	22	0	30	34	30
Illumination Foundation	Street 2 Home	C	NA	49	96	0	145	142	145
Jamboree	Diamond Apartments	C	NA	27	15	0	42	33	42
Jamboree	Doria Apartment Homes	C	NA	6	18	0	24	23	24

Table 2-49
Permanent Supportive Housing Resources

Organization Name	Project Name	Inventory Type	Target Pop.	Beds HH w/ Children	Beds HH w/o Children	Beds HH w/ only Children	Year-Round Beds	PIT Count	Total Beds
Jamboree	Heroes Landing	C	NA	15	70		85	86	85
Mercy House	AFH PSH Collaboration II	C	NA	0	7	0	7	7	7
Mercy House	CCH PSH Collaboration II	C	NA	0	1	0	1	1	1
Mercy House	CCH PSH Collaborative	C	NA	0	1	0	1	1	1
Mercy House	CoC Leasing	C	NA	9	13	0	22	26	22
Mercy House	FAM PSH Collaboration II	C	NA	0	12	0	12	12	12
Mercy House	FSI PSH Collaboration	C	NA	0	39	0	39	38	39
Mercy House	FSI PSH Collaboration II	C	NA	0	17	0	17	17	17
Mercy House	MCY PSH Collaboration II	C	NA	12	16	0	28	27	28
Mercy House	MCY PSH Collaborative	C	NA	12	106	0	118	140	118
Mercy House	Mills End and PSH Leasing Consolidation	C	NA	2	19	0	21	23	21
Mercy House	POH PSH Collaboration II	C	NA	0	20	0	20	20	20
Mercy House	The Aqua	C	NA	0	56	0	56	2	56
Orange County Housing Authority	#1 Consolidated Shelter Plus Care TRA	C	NA	153	123	0	276	329	276
Orange County Housing Authority	#2 Consolidated CoC TRA	C	NA	69	54	0	123	120	123
Orange County Housing Authority	#3 Consolidated CoC TRA	C	NA	99	84	0	183	179	183
Orange County Housing Authority	#4 Consolidated CoC TRA	C	NA	91	61	0	152	132	152
Orange County Housing Authority	Jackson Aisle	C	NA	0	29	0	29	27	29
Orange County Housing Authority	Placentia Veterans Village	C	NA	12	45	0	57	47	57
Orange County Housing Authority	Potter's Lane PB VASH	C	NA	0	8	0	8	9	8
Orange County Housing Authority	Salerno VASH	U	NA	20	11	0	31	0	31
Orange County Housing Authority	VASH	C	NA	574	397	0	971	949	971
Orange County Housing Authority	VASH Project-Based Vouchers - Newport Veteran's Housing	C	NA	0	6	0	6	6	6

Inventory Type Codes:
C = Current Inventory
N = New Inventory
U – Under Development

Target Population A Codes:
SM=Single Males (18 yrs & older); SF=Single Females (18 yrs & older); SMF= Single Males and Females (18 yrs+ w/no children); FC= Families with Children
YM= only unaccompanied Young Males (<18 years); YF= unaccompanied Young Females (<18 years); YMF= unaccompanied Young Females & Females (<18 years); M= mixed populations

Target Population B Codes:
DV=Domestic Violence victims only
VET=Veterans only
AIDS=Only persons with HIV/AIDS

The County typically funds one seasonal emergency shelter which has historically been in a State National Guard armory in the Central Service Planning Area. This shelter has provided up to 200 emergency shelter beds each night during the winter months. Along with beds, these shelters provide shower facilities and meals to individuals and families experiencing homelessness.

Additionally, the County funds the operations of two year-round emergency shelter programs for individuals experiencing homelessness, Bridges at Kraemer Place, and the Yale Navigation Center. Bridges at Kraemer Place provides 200 beds of emergency shelter in the North Service Planning Area and the Yale Navigation Center provides 425 beds of emergency shelter in the Central Service Planning Area. Both programs have a large emphasis on housing-focused case management and supporting participants in accessing needed resources and supportive services to assist them in securing appropriate housing options. The County is committed to supporting cities that operate their own emergency shelters and promoting coordination to increase access to shelter beds amongst the unsheltered population. There is one year-round program located in the Unincorporated areas of the County. American Family Housing leases space to the Illumination Foundation for the provision of 18 transitional housing units in Midway City.

Farm Workers

As defined in the County of Orange Zoning Code, a farm worker is an employee engaged in agriculture, which includes farming in all its branches, including preparation for market and delivery to storage or to market or to carriers for transportation to market. Historically Orange County's economy was linked to agriculture. While there are still active farming areas on the Irvine Ranch, Rancho Mission Viejo, and in some cities, shifts in the local economy to production and service-oriented sectors have significantly curtailed agricultural production within the county. Today, Orange County is a mostly developed urban/suburban area, with a strong local economy. Although the county is increasingly capturing major employers in Southern California, this growth is not tied to an agricultural base.

Recent U.S. Census Bureau estimates reported about 169 persons employed in agricultural occupations in Unincorporated Orange County. This represents about 0.17% of all occupations in Unincorporated Orange County (**Table 2-50**).

Table 2-50
Agricultural Employment –
Unincorporated Orange County, Orange County, and SCAG Region

Employment By Occupation	Unincorporated Orange County	% of Unincorporated Orange County	Orange County	SCAG Region Total
Total Jobs: Farming, Fishing, and Forestry Occupations	109	0.17%	5,823	57,741
Full-Time, Year-Round Jobs: Farming, Fishing, and Forestry Occupations	60	0.14%	3,246	31,521
Total Jobs in Agriculture, Forestry, Fishing, and Hunting Industry	179	0.28%	7,744	73,778
Full-Time, Year-Round Jobs in Agriculture, Forestry, Fishing, and Hunting Industry	N/A	N/A	5,256	44,979

Source: SCAG Local Housing Pre-Certified Local Housing Data 2020, American Community Survey, 5-Year Estimates, 2018

The U.S. Department of Agriculture, National Agriculture Statistics provides data on hired farm labor across the United States. The data is compiled at both a State and County level. Within Orange County, a total of 99 farms reportedly hired 1,772 workers in 2017. Permanent workers, those who work 150 days or more per year, represent the largest category of workers with 1,106 workers (62%). A total of 666 workers (38%) are considered seasonal and work less than 150 days per year. Orange County reported 340 migrant workers (19%) with full time hired labor in 2017. In addition, the County reported 176 unpaid workers.

While there is still significant agricultural production on the Irvine Ranch and Rancho Mission Viejo, farmland has steadily decreased in recent decades and thus, the need for farm worker housing is not as great as it once was.

Consistent with California Health and Safety Code Sections 17021.5 and 17021.6, the County's Zoning Code provides that agricultural employee housing is permitted by-right, without a Use Permit (UP), in single-family zones for six or fewer persons and in agricultural zones with no more than 12 units or 36 beds. The Orange County Zoning Code currently permits farm worker housing in the A1 (General Agricultural) District with the approval of a Site Development Permit (SDP).

Analysis of Special Housing Needs and Housing Element Resources for Special Needs Groups

As the tables in the Special Housing Needs section above demonstrate, the Unincorporated areas of the County appear to be in need of extremely low, very low, and low-income housing. In addition, the data reveals that the Unincorporated County requires housing to address the special needs of the senior population over 65. In addition, a greater stock of housing that is larger than 4 bedroom, or more multifamily housing units, would alleviate some of the overcrowding and pricing concerns that are evident in some areas of the Unincorporated County. Due to the low populations of disabled persons under 65 and farmworkers, housing to address these special needs populations are lower priority.

Appendix A provides accomplishments relating to improving the housing needs of these special needs groups. The County continues to work with the community and housing developers to find solutions to create accessible new housing options and better understand the unique needs of community members. As such, the County has included the programs in the Housing Action Plan to provide for accessible housing.

3. CONSTRAINTS

Governmental Constraints

Land Use Plans and Regulations

General Plan

Each city and county in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of the General Plan establishes the basic land uses and density of development within the various areas of the County. Under state law, the General Plan elements must be internally consistent, and the County's zoning must be consistent with the General Plan. Thus, the land use plan must provide suitable locations and densities to implement the policies of the Housing Element. The Orange County General Plan Land Use Element provides for four residential land use designations, as shown in **Table 3-1**.

Table 3-1
Residential Land Use Categories –
Orange County General Plan Land Use Element

Designation	Maximum Density[1]	Description
Rural Residential (1A)	.025 – 0.5 du/ac	Limited residential use compatible with the natural character of the terrain.
Suburban (1B)	0.5 – 18 du/ac	Wide range of housing types, from estates on large lots to attached dwelling units (townhomes, condominiums, and clustered arrangements)
Urban Residential (1C)	18.0 and above du/ac	Applied to areas where intensive residential development is compatible with surrounding urban development. Characterized by intensive residential uses such as apartments, condominiums, townhomes, and clustered residential units.
Urban Activity Center (6)	18+[2]	Identifies locations intended for high-intensity mixed-use development. Intended to facilitate a more efficient use of transportation systems, conserve energy resources, and develop residential densities that enhance the ability to provide affordable housing.

Source: Orange County General Plan.
[1]Density expressed in dwelling units per net acre.
[2]Special development regulations apply to ensure that the ultimate development pattern is consistent with the intent of the category.

The Land Use Element of the Orange County General Plan designates approximately 72,382.63 gross acres (41%) of the Unincorporated County's total land inventory (excluding Cleveland National Forest) for residential uses, providing for a range of residential types and densities throughout the Unincorporated County.

The maximum gross residential density in the Suburban Residential (1B) land use category is 18 dwelling units per acre, excluding any allowable density bonus. Gross density typically includes

street rights-of-way, utility easements, local parks, and other community infrastructure. Net densities, including allowable density bonus, are based on net parcel size and therefore may be significantly higher. Maximum densities within the Urban Residential (1C) and Urban Activity Center (6) land use categories are regulated by the applicable zoning, as well as by infrastructure and environmental constraints. The County's approach to accommodating affordable housing has not solely been dependent on achieving high densities, but also on maintenance of a higher-than-average number of multifamily units as a proportion of total units, and upon successful leverage of state and federal subsidies for affordable housing. Residential developers have generally proposed projects that do not meet the maximum allowable density due to the economics of development. Development standards do not inhibit proposed projects from reaching the maximum density.

Pursuant to California Assembly Bill (AB 2348) (2004), the "default density" for most Orange County jurisdictions, including the Unincorporated County, is 30 dwelling units per acre[13]. The default density refers to the density at which lower-income housing development is presumed to be feasible, although state law allows jurisdictions to propose alternative densities that are sufficient to facilitate affordable housing based on local experience and circumstances.

The Orange County General Plan is not considered to be a constraint to the goals and policies of the Housing Element as the County's zoning is consistent with the General Plan and adequate sites with appropriate densities have been identified to permit the construction of the County's fair share of new housing units for the 2021-2029 planning period. Under the Housing Opportunities Overlay Regulations (section 7-9-44) adopted in 2020, affordable housing developments are permitted by-right at a density up to 43.5 units per acre, excluding density bonus.

To meet the requirement that the County complete any necessary rezoning to meet its RHNA by October 15, 2022, on September 27, 2022, the Board of Supervisors adopted an amendment to the Housing Opportunities Overlay Zone regulations to increase the base density to 70 units per acre, excluding any applicable density bonus.

Since the January 10, 2006 adoption of the Housing Opportunities Overlay Zone, eight (8) projects have been built (within the Housing Opportunities Overlay Zone) which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families. Those projects, with densities between 30 and 63.4 units per acre, include affordable units at the 30%, 50% and 60% AMI level and demonstrate that lower-income housing is feasible under current regulations (see further discussion in Appendix B, Land Inventory).

[13] Memo of June 9, 2005 from California Department of Housing and Community Development on AB 2348 of 2004.

Zoning Ordinance

Zoning regulations serve as a key General Plan implementation tool. The County's Zoning Code accommodates a diversity of residential housing types. As addressed in Section 2, the County has made efforts to remove as many constraints as possible from the Zoning regulations; however, existing regulations can pose a barrier to the existence of affordable housing. It allows for innovation in design standards within parameters designated on Land Use Element, Table III-1 provided the overall density and dwelling unit capacity is not exceeded. The Orange County Zoning Code provides for 17 residential zoning districts, as listed below:

- A1 "General Agricultural" District
- AR "Agricultural Residential" District
- E1 "Estates" District
- RHE "Residential Hillside Estates" District
- E4 "Small Estates" District
- H "Housing Opportunities" Overlay District
- MX "Mixed-Use" Overlay District
- RE "Residential Estates" District
- R1 "Single-Family Residence" District
- RS "Residential, Single-Family" District"
- R2 "Multifamily Dwelling" District
- R3 "Apartment" District
- R4 "Suburban Multifamily Residential" District
- PC "Planned Community" District
- PD "Planned Development" Combining District

Of the 17 residential use zoning districts (including A1 General Agricultural), multifamily projects of four units or less are permitted by-right in the R2, R3 and R4 zones, as well as in Planned Community Districts. Single-family dwellings are allowed in all residential zones in the County. Allowable densities in these zones range from 0.4 units/acre in the A1 zone up to 43 units/acre in the R2 and R3 zones. The height limit is 35 feet in all zones except R3, which allows up to 65 feet. Please see **Table 3-2** for a summary of the applicable development standards in these zoning districts. Notwithstanding the number of zoning districts identified, however, the overwhelming majority of development approved within the Unincorporated County was accomplished under the PC "Planned Community" District.

Planned Community District: One particularly effective component of the County's zoning regulations is the Planned Community (PC) designation. In general, each planned community is subject to the standard provisions of the Zoning Code. The purpose of this district is to provide the authority, regulations and procedures whereby large land areas can be planned, zoned, developed, and administered as individual, integrated communities. It is intended that each planned community will be developed to take maximum advantage of its location, environment, and physical features. Several of these planned communities are also the subject of development agreements, which identify the levels of development allowed and important public facilities that will accompany development.

Rancho Mission Viejo Planned Community: The most recently approved Planned Community is Rancho Mission Viejo (RMV), approved by the Board of Supervisors on November 8, 2004. Rancho Mission Viejo is located in southeastern Orange County east of San Juan Capistrano and north of San Clemente. Rancho Mission Viejo includes the development of 5,768 acres of the 22,683-acre Planned Community with a maximum of 14,000 dwelling units, 6,000 of which are forecasted to be age restricted, and 5.2 million sq. ft. of employment floor area. The remainder of Rancho Mission Viejo, 16,915 acres, is planned to remain as protected, permanent open space. Build-out of the planned community is expected in approximately 20 years.

As is the case with nearly all planned communities approved in Orange County, Rancho Mission Viejo is subject to a Development Agreement between the County and the landowner. The Ranch Plan Development Agreement requires that the developer offer for dedication an aggregate of 60 gross acres of land to the County, which would be graded and improved for the County's development of low-income rental housing. In July 2006 the County and property owner entered into an Affordable Housing Implementation Agreement (AHIA), or as may be supplemented, that delineates the process for transferring the property to the County for development. Development assumptions for Rancho Mission Viejo are discussed in greater detail in Appendix B – Land Inventory.

Since the grand opening of Planning Area 1 in 2013, Rancho Mission Viejo and neighborhood builders have completed and sold/rented 1,247 housing units in Sendero PA1, of which 286 are deed-restricted senior housing (Age Qualified) units. In addition, 107 senior affordable apartments have been leased. Since the grand opening of PA2 in 2015 and through the end of 2019, Rancho Mission Viejo and neighborhood builders have obtained building permits for 2,507 market rate units in Esencia PA2, and occupancy permits (closings) for 2,475 market rate units, of which 830 have been deed-restricted senior housing (Age Qualified) units. In addition, a 112-unit affordable family apartment project has been leased. Planning Area 3.2a was issued certificates of occupancy in January 2023 and includes 145 deed-restricted senior housing (Age Qualified) and 134 market-rate, for sale units. Planning Area 3.2b has been approved with six neighborhood builders for a total of 514 units.

Mixed-Use Overlay District: Another particularly effective component of the County's zoning regulations is mixed-use development, which is permitted in the MX district. In contrast to single-use zones, mixed-use combines residential with retail, office, commercial and/or entertainment developments. Mixed-use not only allows residents to live, work, and shop within walking distance, it strengthens the economy with an employee and retail base for local businesses. Mixed-use is especially beneficial for communities lacking vacant residential sites, creating the opportunity for new housing through infill development and decreasing housing costs through shared amenities and parking.

The County's MX "Mixed-Use" Overlay District provides the opportunity to develop high density housing in commercial areas and requires residential uses for fifty percent (50%) of the total floor area. These regulations are intended to facilitate the vertical and horizontal mixing of retail, office, and residential uses and development of mixed-use buildings accommodating both residential and employment activities. In both infill contexts and in larger projects, these regulations shall facilitate the inclusion of cultural, civic, education, and urban recreational uses and support transit-oriented development and alternative modes of transportation.

A summary of the development standards for the 17 zoning districts permitting residential development is provided in **Table 3-2**. These development standards are reasonably necessary to protect the public health, safety and welfare and maintain the quality of life, and are not considered to be constraints to the development of housing. For additional details, development standards for each zoning district are available on the County's website, per Government Code 65940.1(a)(1)(B).

Table 3-2
Summary of Residential Zoning Regulations
County of Orange (Unincorporated Areas)

Zoning Districts	Site Coverage	Min. Land Area per Unit/ Max. Density	Height Limit	From Ultimate Street R/W Line			From Property Line Not Abutting Street		On Panhandle Building Site from Any Property Line
				Front	Side	Rear	Side	Rear	
A1 "General Agricultural" District	NA	4 acres/ 1 du/ac	35 ft.	20	5	25	5	25[4]	10
AR "Agricultural Residential" District	35	7,200 sq.ft./ 6.1 du/ac	35 ft.	20	5	25	5	25[4]	10
E1 "Estates" District	35	1 acre/ 1.0 du/ac	35 ft.	45	20	50	20	50[4]	10
RHE "Residential Hillside Estates" District	35	10,000 sq.ft./ 4.4 du/ac	35 ft.	10	8	25	8	25[4]	10
E4 "Small Estates" District	35	10,000 sq.ft./ 4. 4-du/ac	35 ft.	30	note[1]	25	note[1]	25[4]	10
H "Housing Opportunities" Overlay District[5]	NA	Up to 70 du/ac	65 ft.	20	note[2]	25	note[2]	25[4]	10
MX "Mixed-Use" Overlay District[5]	NA	Up to 33 du/ac	note[5]	note[5]	note[5]	note[5]	note[5]	note[5]	note[5]
RE "Residential Estates" District	35	20,000 sq.ft./ 2.2 du/ac	35 ft.	40	note[1]	25	note[1]	25[4]	15
R1 "Single-Family Residence" District	NA	7,200 sq.ft./ 6.1 du/ac	35 ft.	20	5	25	5	25[4]	10
RS "Residential, Single-Family District"	35	7,000 sq.ft./ 6.2 du/ac	35 ft.	10	10	10	note[3]	0	10
R2 "Multifamily Dwelling" District	NA	1,000 sq.ft./ 43.5 du/ac	35 ft.	20	5	25	5	25[4]	10
R3 "Apartment" District	NA	1,000 sq.ft./ 43.5 du/ac	65 ft.	20	note[2]	25	note[2]	25[4]	10
R4 "Suburban Multifamily Residential" District	NA	3,000 sq.ft./ 14.5 du/ac	35 ft.	20	5	25	5	25[4]	10
PC "Planned Community" District	For each proposed Planned Community, a specific PC Program Text shall be adopted by ordinance that specifies land use regulations and procedures applicable to all areas within the boundaries of the planned community.								
PD "Planned Development" Combining District	In any district where the district symbol is followed by, as a part of such symbol, the letters "(PD)," planned development projects shall be permitted subject to the use regulations, development standards, and other provisions. Projects located within this district that are not a planned development, or not part of a planned development, shall comply with the regulations of the base district and are not subject to the provisions of this section.								

Notes:
[1]Ten (10) percent average ultimate net width of building site-Maximum twenty (20) feet.
[2]Five (5) feet; add one (1) foot for each additional story over two (2).
[3]Ten (10) feet on one side only or ten (10) feet total of two (2) sides combined.
[4]In computing the depth of a rear set back from any building where such setbacks open on an alley, private street, public park or public beach, one-half of the width of such alley, street, park or beach may be deemed to be a portion of the rear setback, except that under this provision, no rear setback shall be less than 50 feet.
[5]H "Housing Opportunities" Overlay District and MX "Mixed-Use" Overlay District: Sites shall comply with the base district site development standards.
Source: County of Orange Zoning Code, 2020

Off-Street Parking Requirements

Parking is a necessary aspect of any development and can constrain the development of affordable housing. For every parking space that is required, there is less land available for development. Excessive parking requirements can thus drive up the cost of development. Parking requirements in the County, however, are similar to other jurisdictions and are not considered to be so stringent as to be a constraint to housing development. In addition, the County has adopted less-restrictive parking requirements applicable to affordable and senior citizen housing to facilitate their development. Furthermore, the Zoning Code provides additional opportunities for all developments to request alternatives to off-street parking regulations (section 7-9-70.9). Residential parking requirements for the County are displayed in **Table 3-3**.

The County's Zoning Code assigns parking standards with the intent to promote efficient land use. It is intended that these regulations will result in properly designed parking facilities of sufficient capacity to minimize traffic congestion, enhance public safety, generally provide for the parking of motor vehicles at locations other than on the streets, and for safe passage of pedestrians to and from parked vehicles.

Table 3-3
Residential Parking Requirements
County of Orange (Unincorporated Areas)

Type of Residential Development	Required Off-Street Parking Spaces	Comments
Attached / Detached Single-Family Dwellings	(a) Two (2) covered parking spaces required for each dwelling. (b) In addition to parking required in (a) above, additional parking spaces shall be provided as follows: (1) Those dwellings having less than an eighteen (18)-foot setback from the right-of-way (driveway), whichever is closest to the garage or carport, shall provide one (1) additional off-street parking space within two hundred (200) feet of the dwelling subject to location requirements in (f) "Location of residential parking spaces," below. (2) Those dwelling units located within a planned development shall provide an additional one-half (0.5) guest parking space per unit subject to (f) "Location of residential parking spaces," below. (3) Those dwellings with more than four (4) bedrooms shall provide an additional one-half (0.5) off-street parking space on the same parcel for each additional bedroom. In addition to the two (2) required covered spaces. If one additional space is required, if shall be covered. If more than one additional space is required, at least fifty percent (50%) of the additional spaces shall be covered and may be tandem spaces. (c) Those dwellings on streets that do not allow on-street parking shall provide one (1) additional off-street parking space within two hundred (200) feet of the unit subject to "Location of residential parking spaces," below.	For purposes of this section, a room such as a den, study or sewing room shall be considered a bedroom. One-half (0.5) and greater parking spaces shall be rounded up, less than one-half (0.5) shall be rounded down. All parking spaces are subject to location requirements in below.

Table 3-3
Residential Parking Requirements
County of Orange (Unincorporated Areas)

Type of Residential Development	Required Off-Street Parking Spaces	Comments
Multifamily Dwellings	(a) Zero to one-bedroom dwelling units: One and one-half (1.5) off-street parking spaces for each dwelling unit. Except as otherwise provided in d. below, one (1) space shall be covered for each dwelling unit. (b) Two-bedroom dwelling units: Two (2) off-street parking spaces for each dwelling unit. Except as otherwise provided in d. below, one (1) of the spaces shall be covered for each dwelling unit. (c) Three or more-bedroom dwelling units: Two and one-half (2.5) off-street parking spaces for each dwelling unit, plus one-half (0.5) off-street parking space for each bedroom in excess of three (3). Except as otherwise provided in d. below, two (2) spaces shall be covered for each dwelling unit. (d) Notwithstanding the provisions of this subsection, the requirement that off-street parking spaces be covered is not applicable for multifamily projects of five (5) or more dwelling units. (e) Guest parking: In addition to the above, two-tenths (0.2) guest parking spaces per dwelling unit shall be provided.	For purposes of this section, a room such as a den, study or sewing room shall be considered a bedroom. One-half (0.5) and greater parking spaces shall be rounded up, less than one-half (0.5) shall be rounded down. All parking spaces are subject to location requirements below.

Affordable housing For projects where 100% of the units, excluding the Manager's Unit, are affordable to households earning 80% or less of the Average Median Income (AMI) established by the California Department of Housing and Community Development (HCD) for the County of Orange	Minimum required parking spaces			
	Unit Size (Square Feet)	Assigned	+	Unassigned
	700 or less	1.0		-
	701—800	1.0	+	0.17
	801—900	1.0	+	0.34
	901—1000	1.0	+	0.50
	1001—1100	1.0	+	0.67
	1101—1200	1.0	+	0.84
	1201—1300	1.0	+	1.00
	1301—1400	1.0	+	1.18
	1401—1500	1.0	+	1.34
	Over 1500	1.0	+	1.50

Senior housing (Also known as Senior Citizen Housing Development as defined by Civil Code 51.3 and 51.12, as may be amended.)	(a) Zero to one-bedroom dwelling units: One (1) off-street parking space (b) Two-bedroom to three-bedroom dwelling units: Two (2) off-street parking spaces (c) Four or more bedroom dwelling units: Two and one-half (2.5) off-street parking spaces for each dwelling unit (d) The number of required parking spaces shall be rounded up to the next whole number. (e) If there is any conflict between the senior housing parking requirements set forth in these zoning regulations and the senior housing parking requirements set forth in the State Density Bonus Law, the State Density Bonus Law parking requirements shall be used.
Accessory dwelling units	One (1) additional parking space per accessory dwelling unit per the standards set forth in section 7-9-90 is required, except in the instances listed below. These spaces may be provided as tandem parking on an existing driveway. No additional parking space is required for an accessory dwelling unit in any of the following instances: (a) The accessory dwelling unit is located within one-half (0.5) mile of public transit. (b) The accessory dwelling unit is located within an architecturally and historically significant historic district. (c) The accessory dwelling unit is contained within the existing primary residence, an addition to the existing primary residence, newly built residence, or an existing accessory structure. (d) When on-street parking permits are required but not offered to the occupant of the accessory dwelling unit. (e) When there is a car share vehicle located within one block of the accessory dwelling unit. (f) If the accessory dwelling unit has no bedrooms (i.e. studio units).

Table 3-3
Residential Parking Requirements
County of Orange (Unincorporated Areas)

Type of Residential Development	Required Off-Street Parking Spaces	Comments
Location of residential parking spaces: 1) Required spaces including guest or unassigned spaces shall be off-street and located within two hundred (200) feet walking distance along a pedestrian path (i.e., sidewalk, crosswalk, etc.) of the dwelling unit they serve. 2) For "wrap-around" multifamily, multi-story residential developments, where the units surround an interior parking structure, the required spaces including guest or unassigned spaces shall be off-street and located within two hundred (200) feet of the elevator servicing the units. 3) Assigned spaces shall be designated as to the dwelling unit to which they are assigned on all plot plans submitted for permits.		

Source: County of Orange Zoning Code, 2020

Special Needs Housing Constraints

Persons with special needs include those in residential care facilities, persons with disabilities, the elderly, farm workers, persons experiencing homelessness needing emergency shelter or transitional living arrangements, and single room occupancy units. In accordance with state law, the County does not require residential care facilities, community care facilities, alcoholism or drug abuse recovery treatment facilities, and congregate living health facilities, serving six or fewer residents to obtain any permits; such uses are not treated any differently from any other residential use of property. (See Health & Safety Code §§ 1267.16 [congregate living health facilities], 1566.3 [community care and residential facilities], 1568.0831 [residential care facilities for persons with chronic life-threatening illness], 11834.23 [alcoholism or drug abuse recovery treatment facilities].). There are no constraints on housing for persons with disabilities for facilities serving six or fewer persons. State law allows, and the County requires, residential care facilities, community care facilities, alcoholism or drug abuse recovery treatment facilities, and congregate living health facilities, serving seven or more residents to obtain a Use Permit.

Housing for Persons with Disabilities

Both the Federal Fair Housing Amendment Act (FHAA) and the California Fair Employment and Housing Act require governments to make reasonable accommodations (that is, modifications or exceptions) in their zoning code and other land use regulations to afford disabled persons an equal opportunity to housing. State law also requires jurisdictions to analyze potential and actual constraints to the development, maintenance, and improvement of housing for persons with disabilities.

Reasonable Accommodation

Reasonable accommodation in the land use and zoning context means providing individuals with disabilities, or developers of housing for people with disabilities, flexibility in the application of land use and zoning and building regulations, policies, and procedures, or waiving certain requirements, when it is necessary to eliminate barriers to housing opportunities. For example, it

may be reasonable to accommodate requests from persons with disabilities to waive a setback requirement or other standard of the Zoning Code to ensure that homes are accessible for the mobility impaired. Whether a particular modification is reasonable depends on the circumstances.

To ensure maximum housing flexibility for persons with disabilities, the Orange County Zoning Code makes available reasonable accommodation for persons with disabilities based on the following factors:

- Whether the housing, which is the subject of the request for reasonable accommodation, will be used by an individual with disabilities protected under the law.
- Whether the requested accommodation is necessary to make housing available to an individual with disabilities protected under the law.
- Whether the requested accommodation would impose an undue financial or administrative burden on the County.
- Whether the requested accommodation would require a fundamental alteration in the nature of the County's land use and zoning or building program.

The Director, OC Development Services, is the reviewing authority of reasonable accommodation requests. The Director must notify the applicant within 30 days of an approved/denied request and make a written decision on the request within 60 days of the determination date (section 7-9-129). An appeal from the decision of the Director is allowed and would be heard by the Planning Commission. The County did not deny any requests for reasonable accommodation in the last (5th Cycle) planning period.

The County's Codified Ordinances contains the following provisions regarding housing for persons with disabilities:

- **Reasonable accommodation**. In addition to compliance with state and federal accessibility standards, including Title 24 and ADA requirements, Orange County has established reasonable accommodation procedures (sections 7-1-2 and 7-9-122).
- **Concentration limitations.** County codes do not establish maximum concentration requirements for residential facilities. Sober Living Homes are not permitted to be within 1,000 feet of one another (section 7-9-95.6) or with other Alcoholism or Drug Abuse Recovery/Treatment facilities (section 7-9-32.2/Table 7-9-32.2). No permits have been denied due to maximum concentration requirements.
- **Parking standards.** Parking standards are based on use (e.g., single or multifamily, community care facilities), not on the type of occupant. The Zoning

Code establishes standards for the number of handicapped parking stalls, including location and dimensions (section 7-9-70).

In addition, the County's building codes require that new residential construction comply with the federal accessibility standards contained in the California Building Code (2022 Edition), California Residential Code (2022 Edition), California Green Building Standards Code (2022 Edition), 2022 California Energy Code and the International Building Code (2021 Edition). In addition, any residential units constructed directly by the County, as well as public accommodations, are subject to provision of the Americans with Disabilities Act (ADA). ADA provisions include requirements for a minimum percentage of units in new developments to be fully accessible to the physically disabled. Provision of fully accessible units may also increase the overall project development costs. Enforcement of ADA requirements is not at the discretion of the County but is mandated under federal law under certain conditions.

Because site development standards contained in the Zoning Code are consistent with building code accessibility requirements, the Zoning Code does not place regulatory constraints on housing for persons with disabilities.

Compliance with building codes and the ADA may increase the cost of housing production and can also impact the viability of rehabilitation of older properties required to be brought up to current code standards. However, these regulations provide minimum standards that must be complied with to ensure the development of safe and accessible housing.

Definition of Family

The County does not have a definition of family in the Zoning Code. The County does define a single housekeeping unit, not in terms of familial relationships, but instead, to distinguish a for profit enterprise or business, such as a group home or integral facility, from a residential use (section 7-9-135.1). The County's Zoning Code permits group accommodation for unrelated persons by defining "household" broadly as *"all people occupying a single dwelling unit. A household shall also mean all people occupying two (2) dwelling units on the same site if both units are used as group homes owned or operated by the same owner." 'Household' includes the occupants of community care facilities serving six (6) or fewer persons which are permitted or licensed by the State."* (section 7-9-95.1). This definition does not place a constraint on group homes for disabled persons.

The County's Zoning Code provisions for housing for persons with disabilities are discussed below:

- **Community Care Facilities** – Community care facilities are licensed by the California Department of Social Services. These facilities provide non-medical, residential care, and supervision to children or adults in need of a supportive living environment. The services provided may include assistance in dressing and bathing, supervision of client activities; monitoring of food intake; or oversight of

the client's property. Pursuant to Health and Safety Code Section 1502, as may be amended, community care facilities include the following: residential facility providing 24-hour care; adult day program; therapeutic day services facility; foster family agency; foster family care home; small family home; social rehabilitation facility community treatment facility; full-service adoption agency; and/or noncustodial adoption agency.

In accordance with state law, small community care facilities that serve six (6) or fewer persons are permitted by-right in all residential districts. Community care facilities that serve 7 to 12 persons are permitted within any residential zone subject to approval of a Use Permit.

- **Congregate Living Health Facility** – Congregate living health facilities are licensed by the State of California pursuant to Section 1250 of the Health and Safety Code, as may be amended, to provide inpatient care; including the following basic services: medical supervision, 24-hour skilled nursing and supportive care, dependent or catastrophically and several disabled. A congregate living health facility serving more than twelve (12) persons may be permitted in any district zoned for either multifamily residential or hotels subject to the approval of a Use Permit by Planning Commission pursuant to section 7-9-125. During the previous planning period, 2013-2021, the County issued two Use Permits to congregate living facilities in the Unincorporated areas. No permit applications were denied.
- **Group Homes -** Group Homes are defined as facilities that are "being used as a supportive living environment for persons who are considered handicapped under State or Federal law. A group home operated by a single operator or service provider (whether licensed or unlicensed) constitutes a single facility, whether the facility occupies one (1) or more dwelling units. Group homes under the County's Zoning Code do not include the following: (1) community care facilities; (2) any group home that operates as a single housekeeping unit." (section 7-9-95.1). These types of residences for up to six (6) residents are allowed in any district, planned community, or specific plan area zoned for residential uses, including single-family residentially zoned districts, subject to a ministerial Group Home Permit. Given the ministerial nature of the permit, the permit is not a constraint on serving those with special needs. Group homes, as defined by the County's Zoning Code, operate for profit, and provide a supportive living environment for persons who are considered handicapped under state or federal law. Group home regulations do not apply to residential uses that constitute single housekeeping units. In single housekeeping units, the occupants of a dwelling unit have established ties and familiarity with each other, jointly use common areas, interact with each other, share meals, household activities, and expenses and

responsibilities; membership in the single housekeeping unit is fairly stable as opposed to transient, members have some control over who becomes a member of the household, and the residential activities of the household are conducted on a nonprofit basis.

The County has issued two Group Home Permits since 2020, when the ministerial permit program was first initiated. No permit applications have been denied. Group Homes with seven (7) or more residents are allowed in any district, planned community, or specific plan area zoned for multifamily uses subject to issuance of a Use Permit by the Planning Commission per section 7-9-125. No Use Permits for Group Homes with seven (7) or more residents have been denied. Use Permits for Group Homes with seven (7) or more residents are to assure that the use and scope are compatible with the residential neighborhood, as impacts associated with larger Group Homes have resulted in Code Enforcement complaints from neighbors. The Use Permit allows the County to incorporate conditions, including a requirement that the corporate Group Home draft and maintain a good neighbor policy. These conditions are intended to decrease the impact of larger Group Homes on residential neighborhoods.

- **Sober Living Homes** – Sober living homes are a type of group home operated as a cooperative living environment providing an alcohol and drug-free home for persons recovering from alcoholism and/or drug abuse, which are not required to be licensed by the State. The County of Orange made specified findings related to Sober Living Homes when it adopted an ordinance in 2019. At that time, the Board of Supervisors made findings that in addition to the presence of 158 alcohol and drug treatment recovery beds and 21 licensed facilities and/or certified alcohol and drug treatment programs in the Unincorporated areas, there were at least 10 unlicensed sober living homes for which the County had received Code Enforcement Complaints. The Board of Supervisors found that this concentration of licensed and unlicensed treatment beds in the Unincorporated County areas negatively impacted disabled persons by placing them in communities concentrated with treatment centers, thus, not providing persons with disabilities with an opportunity to "live in normal residential surroundings," but rather places persons with disabilities into living environments bearing more in common with the types of institutional/campus/dormitory living that the California Fair Employment and Housing Act (FEHA) and FHAA were designed to provide relief from and which no reasonable person could contend provides a life in a normal residential surrounding. Like other Group Homes, sober living homes for six (6) or fewer residents are allowed in residential districts, subject to a ministerial Group Home Permit. Also, similarly to other Group Homes, sober living homes of seven (7) or more residents shall be permitted in any zoning

district zoned for multifamily residential uses subject to the issuance of a Use Permit by the Planning Commission per section 7-9-125 and compliance with certain conditions. Group and Sober Living Homes are provided the opportunity for a use permit in multifamily zoning districts that are not provided to uses for groups of non-disabled persons, like boarding houses and dormitories. Thus, Group and Sober Living Homes are provided preferential treatment under the code by the allowance to operate larger facilities in multifamily residential districts subject to a Use Permit. No Group Home permit or Use Permit applications have been denied.

- **Reasonable Accommodations –** The County has a robust reasonable accommodations procedure that allows permitting requirements for Group Homes and Sober Living Homes to be waived or modified for eligible disabled persons pursuant to section 7-9-129 – Reasonable Accommodations.

Although certain types of housing for persons with disabilities require ministerial or Use Permits for larger homes which could serve as barriers to housing for persons with disabilities, the County's robust Reasonable Accommodation procedures, the fact that no permits have been denied, and no facilities have been closed by Code Enforcement action, demonstrates that rather than a barrier, the County has provided safe neighborhood environments for persons with disabilities. In addition, group homes decrease affordability for the areas they are in because corporate entities can and do outbid regular homebuyers and then can and do charge exorbitant rents per person. This causes a decrease in the affordable options available to all families in Orange County. Moreover, as of March 2023, there are 354 licensed facilities, accounting for 2,159 beds in Orange County as a whole. Based on State data, there are 16 of these licensed facilities in Unincorporated areas. More facilities have come online in Orange County as a whole and in Unincorporated areas since the 2019 adoption of the Group Home and Sober Living Home ordinance.

Given HCDs guidance on County ordinances relating to Group and Sober Living Homes, the County will review its Group Home and Sober Living Home ordinances by 2026 as detailed in Program 8.

On-/Off-Site Improvements

The on- and off-site improvements required for residential projects are determined by the location and type of the proposed project. For example, construction of a single-family home typically undergoes a ministerial permit process, and any site improvement requirements are determined prior to building permit issuance. These site improvements must be provided by the developer in accordance with the applicable sections of the General Plan, Zoning Code, and/or Specific Plan (if applicable). Typical on-site improvements for single-family homes include:

- Grading improvements in compliance with the County's Grading Code

- Drainage improvements in compliance with the County's Master Plan of Drainage
- Stormwater improvements in compliance with the County's Water Quality Ordinance
- Connections for wet and dry utilities in compliance with the County's adopted building codes
- Planting, irrigation, and landscape-related improvements shall comply with the County's Landscape Irrigation Code
- Off-site improvements (e.g., roads and schools) are generally addressed through the collection of impact fees

A residential development that includes one or more lots is considered a subdivision and requires approval of a discretionary permit. Multifamily housing developments also require discretionary approvals unless they are exempt under State law. If a multifamily housing development is proposed as a condominium project, the approval process also requires the submittal of a subdivision map. For these multi-unit projects, the County requires the construction of reasonable on- and off-site improvements pursuant to the Subdivision Map Act. Improvements must also comply with the applicable sections of the General Plan, Zoning Code, and/or Specific Plan (if applicable). At a minimum, on- and off-site improvements required of the developer typically include those improvements listed above along with the following:

- Grading and improvement of public and private streets and alleys, including surfacing, curbs, gutters, cross gutters, sidewalks, ornamental street lighting, and safety devices
- Sufficient storm drainage and flood control facilities to carry storm runoff, both tributary to and originating within the subdivision
- Sanitary sewage system serving each lot or unit of the subdivision
- Water supply system providing an adequate supply of potable water to each lot and fire hydrants within the subdivision
- Fire hydrants and connections
- Survey monuments
- Public utility distribution facilities, including gas, electric, and telephone necessary to serve each lot in the subdivision

The County may also require the dedication of parcels of land intended for public use, including:

- Streets, highways, alleys, easements, rights-of-way, and land intended for public use
- Vehicular access rights from any parcel to highways or streets

- Private utility easements required by the various utilities
- Easements for natural and improved drainage facilities
- Area dedicated or reserved for parks, recreational facilities, fire stations, libraries, or other public uses as deemed necessary

Dedicated streets, highways, alleys, easements, rights-of-way, etc. must be designed, developed, and improved according to County standards. Roadway classifications are based on the existing and projected traffic need. These roadway classifications are described in the County's Transportation Element and include Commuter (2 lanes), Secondary (4 lanes), Primary (4 lanes, divided), Major (6 lanes, divided), and Principal (8 lanes, divided). Depending on the classification, right-of-way requirements can range from 40 feet to 142 feet with varying curb-to-curb requirements. Private streets as part of developments are considered by the County on a project-by-project basis and must obtain approval of the Orange County Fire Authority (OCFA).

While site improvements may add to the cost of developing residential units, they are required for the health, safety, welfare, and quality of life for residents. Standards for on- and off-site improvements are identified in the General Plan, Zoning Code, and the County of Orange Standard Plans and do not unduly constrain housing development in the Unincorporated areas.

Building Codes

Orange County has adopted the California Building Code (CBC) (2022 Edition), California Residential Code (2022 Edition), California Green Building Standards Code (2022 Edition), 2022 California Energy Code and the 2021 edition of the International Building Code (IBC), which establish construction standards for all residential buildings. These building codes are used as a collective set of rules to guide new construction, adaptive reuse, and renovation. The County's building codes are based on regulations necessary to protect the public health, safety, and welfare. These minimum standards cannot be revised to be less stringent without sacrificing basic safety considerations and amenities.

The County's building codes are updated, as necessary, and reflect conditions unique to Orange County. They contain minimum building requirements for building/fire protection, structural and seismic safety and installation of devices/fixtures that reduce energy consumption. State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic, or topographic conditions and requires that local governments making changes or modifications in building standards must report such changes to the Department of Housing and Community Development and file an expressed finding that the changes are needed.

Together, building and zoning codes help to preserve the housing stock by requiring owners to maintain their properties in sound condition. As part of the County's effort to preserve existing housing, the County has adopted the strategy of taking a "hands-on" educational approach to code enforcement by working closely with owners to explain and apply these codes that address

building violations and substandard housing conditions. Neighborhood Preservation staff (also known as Code Enforcement) now leads a multi-agency effort that often entails coordination with Orange County Fire Authority, County Building Inspection, OC Community Resources, Orange County Health Care Agency, Orange County District Attorney, County Counsel, and other agencies to provide owners with guidance in making needed corrections and repairs, in order to maintain their properties in a safe and maintained condition.

Compliance with building codes may increase the cost of housing production and also impact the viability of rehabilitation and preservation of older properties required to be brought up to current code standards. However, these regulations provide minimum standards that ensure the development of safe and accessible housing and do not serve as constraints, but instead as enhancements for residents.

Development Processing Procedures

Residential Permit Processing

Builders and developers frequently cite the cost of holding land during the evaluation and review process as a significant factor in the cost of housing. Undoubtably, the evaluation and review process required by County procedures contribute to the cost of housing. State law has established maximum time limits for projects approvals and County policies provide from the minimum processing time necessary to comply with legal requirements and review procedures.

Processing times vary depending on the magnitude and complexity of the development proposal. Factors that can affect the length of development review include the completeness of the development application and the responsiveness of development to staff comments and requests for information. Approval times are sustainably lengthened for projects that are not exempt from the California Environmental Quality Act (CEQA), require rezoning or general plan amendments, or encounter community opposition.

Table 3-4 summarizes the types of housing permitted in each zone. Timeframes for housing permits are described below and shown in Table 3-5.

Procedures and Findings and Conditions for Single-Family and Multifamily Residential Projects

Single-family and multifamily developments may involve discretionary permits as shown in Table 3-4. The type of permit could vary depending on the nature of the development and any deviations from development standards proposed by the developer. Single-family and multifamily developments may require discretionary permits including a Use Permit, Site Development Permit, or General Plan and/or Specific Plan Amendment. Again, this is determined based on the developer’s requests.

Orange County Codified Ordinances section 7-9-125.3 sets forth the procedures for all discretionary permits, which includes a 30-day window for OC Development Services to determine whether the application submittal is complete. If the application is incomplete, written notification of the deficiencies is provided to the applicant.

Specific procedures and requirements for each type of discretionary permit are set forth in OCCO sections 7-9-126.1 [Site Development Permit], 7-9-126.2 [Use Permit], Variance Permit [7-9-126.4], Area Plan [7-9-128], General Plan Amendment [7-9-131], Zoning Code Amendments and Zone Changes [7-9-132], and Specific Plan Amendment [7-9-133]. The requirements are not onerous and are intended to provide the County with information about the nature of the planned development, for example, detailed development plans and a description of operating uses and characteristics For General Plan Amendments, the application must include "a statement, supported by documentation, which describes how the proposed amendment conforms to the General Plan's goals and the benefit to the public that will result from approving the proposed change or changes to the General Plan." (OCCO Section 7-9-131.3). Specific Plan adoptions and amendments require similar statements and draft amendments or plans. These are common requirements that allow OC Development Services to understand the nature of the requests and potential impacts.

While Site Development Permits do not require a public hearing and are approved by the Director, all other discretionary permits listed above require public hearings and are considered by either the Zoning Administrator or the Planning Commission, with appeals heard by either the Planning Commission or the County Board of Supervisors.

The following findings are required to be made upon approval of any discretionary permit (OCCO Section 7-9-125.6):

> (a)(1) General Plan. The use or project proposed is consistent with the General Plan.
>
> (2) Zoning Code. The use, activity or improvement(s) proposed is consistent with the provisions of the Zoning Code.
>
> (3) CEQA. The approval of the permit application is in compliance with the requirements of the California Environmental Quality Act.
>
> (4) Compatibility. The location, size, design and operating characteristics of the proposed use will not create conditions or situations that may be incompatible with other permitted uses in the vicinity.
>
> (5) General welfare. The approval of the permit application will not result in conditions or circumstances contrary to the public health and safety and the general welfare.

(6) Public Facilities. The approval of the permit application complies with Codified Ordinances Section 7-9-711.

(b) For Variance applications. In addition to the findings required by paragraph one (1) of this subsection, the following findings shall be made by the approving authority prior to the approval of any Variance application:

(1) Special circumstances. There are special circumstances applicable to the subject building site which, when applicable zoning regulations are strictly applied, deprive the subject building site of privileges enjoyed by other property in the vicinity and subject to the same zoning regulations. (The special circumstances shall be specified in the adopted finding.)

(2) No special privileges. Approval of the application will not constitute a grant of special privileges which are inconsistent with the limitations placed upon other properties in the vicinity and subject to the same zoning regulations, when the specified conditions are complied with.

(c) Modified development standards. If the land use regulations of a planned community or specific plan allow a discretionary permit, other than a Variance Permit, to modify the site development standards to be less restrictive than otherwise stated in the enabling ordinance, the following finding shall be made in addition to "(1)" above: "The alternative development standard(s) will result in an equivalent or better project in terms of adverse impacts and public benefits to the immediate and surrounding community."

(d) New use allowed. Where the enabling ordinance authorizes a discretionary permit to allow a principal use not specifically identified as permitted or prohibited, the following additional finding shall be made in addition to "(1)" above: "The proposed use is consistent with the purpose and intent of the (name) district/planning area."

These findings ensure the orderly development of residential and other uses within the County Unincorporated Areas.

Discretionary permits for single-family and multifamily developments may also include conditions of approval that ensure compliance with State and Federal laws. For example, conditions vary based on the development proposed and its location, but conditions may include requirements such as: (1) completion of a Water Quality Management Plan pursuant to State law prior to the issuance of building and grading permits; (2) detailed landscape plans to assure compliance with requirements for native and drought resistant plants; (3) submission of fire master plans to assure the safety of residents and compliance with State and local fire regulations pertaining to development; (4) demonstrated compliance with the County's National Pollutant Discharge Elimination System (NPDES) Implementation Program to ensure compliance with federal law; (5) submission of a Stormwater Pollution Prevention Plan; (6) submission of an Erosion and

Sediment Control Plan; (7) submission of drainage and/or geology studies; (8) indemnification of the County.

The County limits conditions imposed on discretionary permits as much as possible with an eye toward only imposing conditions necessary to comply with state and/or federal law or conditions to assure safety and compatibility of the project proposed. The discretionary permit findings and conditions do not impose an improper burden on applicants, but instead assure a streamlined process for compliance with all applicable laws and regulations.

In July 2024, the County removed the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable units (see Program 2). These uses will be allowed as a by-right use. For multifamily development with 5 or more units, the Site Development Permit requirements will be amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards for certain projects. The County adopted Objective Design Standards (ODS) to provide local guidance on design and standards for housing development, including by-right projects, as allowed by State law and the Housing Accountability Act which prohibits a local agency from disapproving or reducing the density of housing development projects that comply with local and state regulations unless the agency can make certain written findings.

The County also created an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law (see Program 3).

Table 3-4
Housing Types Permitted in Residential Zoning Districts

Uses	AR	E1	RHE	E4	RE	R1	RS	R2	R3	R4
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P	P
Alcoholism or Drug Abuse Recovery/Treatment Facilities Large	-	-	-	-	-	-	-	UP 1,2	UP 1,2	UP 1,2
Alcoholism or Drug Abuse Recovery/Treatment Facilities Small	P	P	P	P	P	P	P	P2	P2	P2
Community Care Facilities- Large (7-12 people)	UP	UP	UP	UP	UP	UP	UP	UP1	UP1	UP1
Community Care Facilities- Small (1-6 people)	P	P	P	P	P	P	P	P	P	P
Congregate Living Health Facility Large (7-12 people)	UP	UP	UP	UP	UP	UP	UP	UP1	UP1	UP1
Congregate Living Health Facility Small (1-6 people)	P	P	P	P	P	P	P	P	P	P

Table 3-4
Housing Types Permitted in Residential Zoning Districts

Uses	AR	E1	RHE	E4	RE	R1	RS	R2	R3	R4
Duplex	-	-	-	-	-	-	-	P	P	P
Farmer Dwelling Unit	P6	P6	-	-	-	-	-	-	-	-
Farmer Housing Complex	P6	P6	-	-	-	-	-	-	-	-
Group Home Large	-	-	-	-	-	-	-	UP 1,2,3	UP 1,2,3	UP 1,2,3
Group Home Small	P	P	P	P	P	P	P	P 2,3	P 2,3	P 2,3
In-home Child Care Large	P	P	P	P	P	P	P	P	P	P
In-home Child Care Small	P	P	P	P	P	P	P	P	P	P
Mobile home Developments	-	-	-	-	-	-	-	UP	UP	UP
Multifamily Dwelling										
2-4 Units	-	-	-	-	-	-	-	P	P	P
5 or More Units	-	-	-	-	-	-	-	SDP	SDP	SDP
Condo	-	-	-	-	-	-	-	UP5	UP5	UP5
Other Housing										
Planned Development	UP	UP	UP	UP	UP	UP	UP	UP	UP	UP
Senior Citizen Housing Development	-	-	-	-	-	-	-	SDP/ UP5	SDP/ UP5	SDP/ UP5
Single-Family OR Mobile home	P	P	P	P	P	P	P	P	P	P
Sober Living Home Large	-	-	-	-	-	-	-	UP	UP	UP
Sober Living Home Small	P	P	P	P	P	P	P	P/UP	P/UP	P/UP
Supportive Housing	P	P	P	P	P	P	P	P	P	P
Transitional Housing	P	P	P	P	P	P	P	P	P	P

P Permitted By-Right
SDP Site Development Permit
UP Use Permit
- Not Permitted

A1 “General Agricultural” District
AR “Agricultural Residential” District
E1 “Estates” District
RHE “Residential Hillside Estates” District
E4 “Small Estates” District
H “Housing Opportunities” Overlay District5
MX “Mixed-Use” Overlay District5
RE “Residential Estates” District

Table 3-4
Housing Types Permitted in Residential Zoning Districts

Uses	AR	E1	RHE	E4	RE	R1	RS	R2	R3	R4
R1 "Single-Family Residence" District RS "Residential, Single-Family District" R2D "Two-Family Residence" District R2 "Multifamily Dwelling" District R3 "Apartment" District R4 "Suburban Multifamily Residential" District Notes: 1. Facilities serving seven (7) or more persons, and senior living facilities, shall be subject to the approval of a Use Permit to the Planning Commission. 2. There shall be one thousand (1,000) feet of separation (as measured from property lines) between any two (2) Alcoholism or Drug Abuse Recovery/Treatment facilities of seven (7) or over that require a UP, or between any two (2) Sober Living Homes, or between any Alcoholism or Drug Abuse Recovery/Treatment facility and Sober Living Home, as defined. 3. Group Homes, including Sober Living Homes, shall obtain a ministerial "Group Home Permit." 4. Multifamily projects of no more than two (2) units as a residential condominium, stock cooperative, and community apartment projects are permitted subject to a Use Permit. 5. Multifamily projects of four (4) or fewer dwelling units are permitted. Multifamily projects of five (5) or more dwelling units are permitted subject to a Site Development Permit. Residential condominium, stock cooperative, and community apartment projects are permitted subject to a Use Permit. 6. Farmworker housing shall be allowed only on land with an ongoing agricultural use. Source: County of Orange Zoning Code, 2020										

Table 3-5 identifies the typical processing time most common in the permitting process for ministerial and discretionary permits. It should be noted that each project does not necessarily have to complete each step in the process (i.e., multiple-family projects less than 5 units may be permitted by-right dependent on the residential zone). Also, certain review and approval procedures may run concurrently. For example, the County allows concurrent processing of permit application for building permits requiring discretionary permit review.

Table 3-5
Typical Project Processing Times Frames by Housing Project Type

	Housing Type Project		
	Single-Family and Second Unit (ADU/JADU)	**Single Family Subdivision**	**Multifamily**
Typical Processing Procedures	▪ Zoning Plan Check ▪ Building Plan Check	▪ Tentative Map ▪ Review Final Map ▪ Zoning and Building Plan Check	▪ Site Development Permit ▪ Use Permit ▪ Zoning and Building Plan Check ▪ Environmental Review
Reviewing Body	▪ Ministerial Review by County Staff	▪ Planning Commission ▪ Board of Supervisors	▪ Could vary by development, but could include Discretionary Review by Director, Planning Commission, or Board of Supervisors
Estimated Total Processing Time	3 to 6 Months	6 to 9 Months	12 to 24 months

Table 3-5
Typical Project Processing Times Frames by Housing Project Type

	Housing Type Project		
	Single-Family and Second Unit (ADU/JADU)	Single Family Subdivision	Multifamily
Estimated Total Time Between Project Approval and Application for Building Permits	NA	6 to 9 Months	Up to 24 months

Source: OC Development Services, 2023

Permit Processing Timeframes – Discretionary Permits

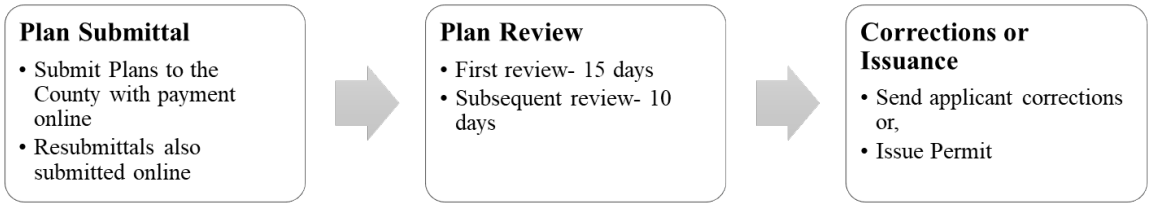
Single-family and multifamily residential projects requiring discretionary actions, such as Use Permits and/or zone changes, necessitate a higher level of review, resulting in a longer processing timeline. Orange County's development approval process is designed to accommodate, not hinder, appropriate development. Approval of discretionary permits for residential uses can typically be processed within 120 days after submission to the County. Recently, the following residential developments were granted entitlements (approval of discretionary permits) in the timeframes indicated (not including building permit processing):

- Casa Paloma (affordable housing): 2 months
- Potter's Lane (affordable housing): 4 months
- The Retreat (luxury senior housing): 9.5 months
- Madison Court (detached condominiums): 16 months

Permit Processing Timeframes - Compliance with Permit Streamlining Act Ministerial Building Permits

Projects that do not require a Site Development Permit or a Use Permit, are permitted by-right and can obtain building permits directly. The process to obtain residential building permits is outlined in **Figure 3-1**, Residential Building Permit Process.

Figure 3-1 Residential Building Permit Process



Single-family home. Construction of a single-family home on a legal building site does not require discretionary approval but requires only grading and/or building permit issuance. The County's permitting process policy identifies a timeframe of 15 business days for first plan check and 10 business days for second plan check and includes concurrent planning and zoning review for compliance with local and State building codes prior to permit issuance.

Single-family residential subdivision. In the Unincorporated areas, residential subdivisions may contain as many as 150 units, or more. The number of units in the subdivision will greatly affect the number of days from submittal of application(s) to issuance of permits. The information below is based upon the average number of days from application submittal to permit issuance for all residential subdivisions regardless of number of units.

Based on data from building permits issued in the years 2020-2021 for new single-family residential subdivisions, it takes an average of 250 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 4-5 plan check reviews, an average of 48 total business days in plan check with the County, and the remainder of the time frame with the applicant. New single-family developments within a planned community have also taken an average of 250 days from submittal of building permit application (plan check initiation) to permit issuance but had an average of 2-3 plan check reviews and an average of 19 total business days in plan check with the County. The target turnaround time for developments located within a planned community is 7 business days for the first plan check, 5 business days for the second plan check, and 3 business days for all subsequent rechecks.

Larger subdivision projects are typically more complex and may be referred to the Planning Commission and/or the Board of Supervisors for approval.

Multifamily residential development. Much like residential subdivisions, multifamily projects may contain as many as 100 units, or more. The number of units in the multifamily project will greatly affect the number of days from submittal of application(s) to issuance of permits. The information below is based upon the average number of days from application submittal to permit issuance for all multifamily projects regardless of number of units.

In the case of multifamily development, the process begins with the submittal of a discretionary Site Development Permit which is subject to administrative approval and typically does not require a public hearing. However, large developments are typically more complex and may be referred to the Planning Commission and /or Board of Supervisors for approval.

Based on data from permits issued between 2016-2021 for new multifamily developments, it takes an average of 280 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 4-5 plan check reviews, an average of 50 total business days in plan check with the County, and the remainder of the time frame with the applicant. The target turnaround time for multifamily developments is 15 business days for first

plan check and 10 business days for subsequent rechecks and includes concurrent planning and zoning review for compliance with local and State building codes prior to permit issuance.

Between 2020-2021, new multifamily developments located within a planned community had an average of 290 days from submittal of building permit application (plan check initiation) to permit issuance. This process includes an average of 5-6 plan check reviews and an average of 29 total business days in plan check with the County. The target turnaround time for developments located within a planned community is 7 business days for the first plan check, 5 business days for the second plan check, and 3 business days for all subsequent rechecks.

Length of Time between Application Approval and Building Permit Issuance

The length of time between receiving approval for a housing development and submittal of an application for building permits is influenced by several factors, none of which are directly impacted by the County. Factors that may impact the timing of building permit issuance include completion of construction drawings and detailed site and landscape design; securing construction and permanent financing; real estate transaction schedules, and retention of a building contractor and subcontractors. The County uses in-house and contracted staff for building plans check which allows for working closely with applicants through the review process and close monitoring of projects, which results in expedited review of projects. Table 3-5 includes estimated total time between project approval and application for building permits. For multi-family projects, applications can take up to 24 months from the time an application is filed and building permits applications are submitted. For single family projects, the typical timeframe is 6 to 9 months.

Compliance with Permit Streamlining Act

From the date an application is submitted, the County internally tracks the amount of time that the application materials have been pending, which reviews are completed, and whether there is additional information needed from the applicant. The County's computer system tracks permit streamlining deadlines. The time the County takes between finding an application complete and issuance of relevant permits complies with the Permit Streamlining Act. Specifically, the County conducts pre-application screenings with applicants to ensure that, once submitted, the County can quickly inform the applicant whether the application is complete within 30-days of its submission. (Gov. Code, section 65943.) The County also maintains detailed lists of information required for each type of permitting application in order to inform potential applicants of what is required for a complete permitting application. (Gov. Code section 65940.) If additional information is required, County staff notifies the applicant within 30 days of the submission of the additional information required through the plan check process. The County timely reviews each new or additional submission within 30 days of when it is received. (Gov. Code section 65943.) For discretionary projects that trigger the Permit Streamlining Act, the discretionary approval is generally issued simultaneously with the approval of the appropriate environmental

documentation, consistent with the requirements of state law. (See Gov. Code sections 65950-65957.)

Programs to Address Development Processing Procedures Constraint

In addition, to address this issue, minimize the impact of the County's review process on the cost of housing, and to facilitate the timely and efficient processing of residential development, the County has enhanced both its in-person and web-based services and has created a permitting process that is 100% paperless.

The County established the County Services Center (CSC) which is a "One Stop Shop" resource for developers, property owners and builders. In the CSC, customers can obtain assistance, information, and step-by-step guides regarding the development process and regulations. This facility also serves as a centrally coordinated location to submit permit applications, plans, and fees. The CSC also offers Express Permits which are simple permits that can be approved within 1-2 business days.

The County has been proactive in implementing strategies to remove development constraints and facilitate development of housing:

- In July 2024, the County removed the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable For multifamily development with 5 or more units, the Site Development Permit requirements were amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards as allowed by State law and the Housing Accountability Act (see Program 2).
- The County also created an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law (see Program 3).The process went into effect in July 2024.

Additionally, OC Public Works has enhanced its electronic resources to deliver processing services and provide information to residential developers more effectively. The OC Development Services website provides continuous access to filing instructions and applications as well as information regarding permit fees and deposits. The County currently offers an online permitting portal – myOCeServices (https:myoceservcies.ocgov.com) for all permit types, including building permits, planning applications, encroachment permits, subdivision applications, and improvement plans. Plans are submitted electronically, and applicants have the ability to check the status of their applications/permits as they are being reviewed. Applicants can request inspections and view results online as well as obtain final inspection results and

Certificates of Occupancy. Issuance of building permits is completed electronically, and the approved plans are immediately available for the applicant via the myOCeServices portal.

To further facilitate an efficient and timely review process, the County allows concurrent processing of permit applications. Applicants may concurrently submit an application for building permits as their proposed project undergoes discretionary permit review and approval. Applicants must complete a form and submit an affidavit that are both readily available on the County's website. This is regular practice for housing development projects.

Environmental Review

Environmental review is required for all development projects under the California Environmental Quality Act (CEQA), and for projects that receive federal funds under the National Environmental Policy Act (NEPA). An Environmental Impact Report (EIR) is required by CEQA of all developments that have the potential of creating significant impacts that cannot be mitigated. All of the planned communities which make up the southern and eastern portions of Unincorporated Orange County required the preparation of EIRs. The only significant areas left to develop are future phases of the "Ranch Plan Planned Community" on Rancho Mission Viejo properties. Most infill residential projects in the Unincorporated County are either Categorically Exempt or require only an Initial Study and Negative Declaration (or Mitigated Negative Declaration). The Negative Declaration process typically takes 3-4 months to prepare, plus the mandated public review period.

The environmental review process can provide useful information for the County about impacts on local environments and needed mitigation measures, as well as useful construction and market information for builders, buyers, lenders, and others. In contrast, the process may be viewed by some parties as an expensive, complex, and time-consuming burden. However, because environmental review is required by state law (CEQA) and federal law (NEPA), it does not pose a significant constraint to housing development.

Development Fees and Improvement Requirements

Development fees include the County's cost of processing applications and permits, as well as costs associated with the provision of public facilities required to serve new residents (often referred to as "impact fees").

Application and Permit Processing Fees

The County has adopted a hybrid fee system which includes a variety of fee types. The majority of building permit fees for both residential and commercial uses are calculated using the valuation-based system. Flat fees are charged for safety-related and simple ministerial permits, and actual costs are recovered for discretionary and grading permits. Based on the 2020-2023 fee schedule, there are approximately 6% valuation-based fees, 63% flat fees, and 11% cost-based

fees. The County conducts an audit of processing costs periodically to ensure that fees do not exceed actual costs. The latest fee update occurred in July 2020. Initial fee deposits as of July 2020 are shown in **Table 3-6**. These fees are re-evaluated and re-adopted by the Board periodically as needed to adjust to economic conditions.

Many processing fees are a result of state or federal mandates, such as plan check and inspection to ensure public health and safety of grading, flood control facilities, roads, bridges, and construction of buildings. Other costs are associated with state and federal requirements for protection of the environment such as Water Quality Management Plans under the Clean Water Act and National Pollutant Discharge Elimination System (NPDES), or Habitat Conservation Plans under the state's Natural Communities Conservation Program.

The County has adopted several cost-saving measures to reduce permit processing fees, including the following:

- A simplified "by-right" approval process for qualifying multifamily projects in the Housing Opportunities Overlay Zone.
- Pre-filing meetings to assist developers in preparing application packages with no charge for the first three hours of staff time for these meetings.
- Planning and permit fee schedule reviewed on an annual basis.
- Annual review of park in-lieu fees to reflect current market values.
- Waiver of park fees for affordable housing projects.

Table 3-6
FY 2021-22 Planning and Development Fees

Fee Category	Deposit Amount*
Planning and Application Fees	
Tentative Parcel Map	$5,000
Final Parcel Map	$3,000
Tentative Tract Map	$8,000
Final Tract Map	$3,000
Use Permit	$5,000-8,000
Variance	$5,000-8,000
Area Plan	$8,000
Site Development Plan	$4,000-8,000
Zone Change	$10,000
General Plan Amendment	$10,000
Specific Plan Amendment	$10,000
Environmental	
Environmental Impact Review	$10,000 + 10%
Negative Declaration	$5,000 + 10%

Source: County of Orange, July 2020
** Items with deposits are based on actual processing costs which may exceed initial deposit amount*

Public Facility (Impact) Fees and Improvement Requirements

After the passage of Proposition 13 in 1978 (Article 13A of the California Constitution) and its limitation on local governments' property tax revenues, cities and counties have faced increasing difficulty in providing public services and facilities to serve their residents. One of the main consequences of Proposition 13 has been the shift in funding of new infrastructure from general tax revenues to development impact fees and improvement requirements on land developers. The County requires developers to provide on-site and off-site improvements necessary to serve their projects, including water, sewer and other utility extensions, street construction, and traffic control device installation that are reasonably related to the project. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities, and school sites, consistent with the Subdivision Map Act. Many of these fees are under the control of other agencies such as school districts, water and wastewater districts, the Transportation Corridor Agencies and Orange County Transportation Authority, and the County has no authority over their amount or collection process. Impact fees that are controlled by the County of Orange are as follows:

- Library.
- Streets and highways.
- Drainage facilities.
- Local parks.

Development fees are passed on to renters and homebuyers in the cost of housing, and thus affect housing affordability. Fees associated with the extension and installation of utilities can be particularly demanding. Most agencies involved in the County's development review process obtain a majority of the revenue for their operations through development fees, and this trend is likely to continue in the future. These fees also help ensure quality development and the provision of adequate public services. For high priority affordable housing projects in the past the County has used redevelopment housing set-aside funds to help pay application fees and other costs associated with the development review process. **Table 3-7** shows development impact fees applied to new housing developments.

Table 3-7
Development Impact Fees – 2021

Fee Category	Fee Amount (per unit)
Parks	$3,290 – 20,800/unit
Roads	$919 – 24,655/unit
Toll Roads (Transportation Corridor Agencies)	$2,513 – 6,056/unit
Schools	$1.68 – 4.08/sq. ft.
Source: County of Orange, September 2021	

The July 2020 fee update resulted in an increase in the overall cost of planning and permitting services. The fees listed in **Table 3-7** can be found on the County's website.

In order to reduce the effects of fees on lower-income housing, the Board of Supervisors provided assistance to affordable projects in 2009 by adopting an ordinance to waive park fees for qualifying density bonus projects. Although development fees represent a significant component of housing costs, the County does what it can to minimize fees.

In order to estimate the effect of development fees on the total cost of housing, **Table 3-8** shows the fees that were paid by a recent affordable project in the Unincorporated areas. This project is located within the Housing Opportunities Overlay Zone and was completed in 2016. As noted in the table, impact fees represented 1.54% of total project cost, and permit processing fees were just 1% of total cost. This analysis demonstrates that the combined cost of permit processing and impact fees represent about 2.14% of the total cost of a typical project in the Unincorporated areas.

Table 3-8
Representative Multifamily Development Cost Example

Item	Total Project Cost	Cost per Unit[1]	% of Total
Land & off-site improvements	$624,750	$39,047	9.0%
Construction	$4,337,849	$271,116	62.3%
Architecture & survey	$415,954	$25,997	6.0%
Construction interest & legal	$219,631	$13,727	3.2%
Other soft costs (reserves, TCAC, marketing, etc.)	$700,369	$43,773	10.1%
Park fees	$58,163	$3,635	0.8%
School fees	$16,368	$1,023	0.2%
Road fees	Not required	Not Required	Not required
Sanitation District fees	$32,810	$2,051	0.5%
Permit processing	$143,580	$8,974	2.1%
Developer profit	$416,000	$26,000	6.0%
Total Costs	$6,858,284	$435,343	100%
[1]Based on 16 units in Midway City			

Senate Bill 35 (Streamlining Affordable Housing Approval)

California Senate Bill 35 (SB 35), codified as Government Code Section 65913.41, was signed on September 29, 2017, and became effective January 1, 2018. SB 35 will automatically be sunset on January 1, 2026 (Section 65913.4(m)). The intent of SB 35 is to expedite and facilitate construction of affordable housing. SB 35 applies to cities and counties that have not made sufficient progress toward meeting their affordable housing goals for above-moderate- and lower-income levels as mandated by the State. In an effort to meet affordable housing goals, SB 35 requires cities and counties to streamline the review and approval of certain qualifying affordable housing projects through a ministerial process.

As of 2018, when a jurisdiction has made insufficient progress toward meeting their above-moderate-income and lower-income RHNA goals, and/or have not submitted the latest Housing Element Annual Progress Report (APR), it is subject to the streamlined ministerial approval process (SB 35 (Chapter 366, Statutes of 2017) streamlining) for proposed developments with at least 50% affordability. All projects, which propose at least 50% affordable units are eligible for

ministerial approval under SB 35 as determined by the SB 35 Statewide Determination Summary. To be eligible for SB 35 approval, sites must meet a long list of criteria, including:

- A multifamily housing development (at least two residential units) in an urbanized area.
- Located where 75% of the perimeter of the site is developed.
- Zoned or designated by the general plan for residential or mixed-use residential.
- In a location where the locality's share of regional housing needs has not been satisfied by building permits previously issued.
- One that includes affordable housing in accordance with SB 35 requirements.
- Consistent with the local government's objective zoning and design review standards; and
- Willing to pay construction workers the state-determined "prevailing wage."

A project does not qualify for SB 35 streamline processing if located within:

- A coastal zone, conservation lands, or habitat for protected species.
- Prime farmland or farmland of statewide importance.
- Wetlands or lands under conservation easement.
- A very high fire hazard severity zone.
- Hazardous waste site.
- Earthquake fault zone.
- Flood plain or floodway.
- A site with existing multifamily housing that has been occupied by tenants in the last ten years or is subject to rent control.
- A site with existing affordable housing.

According to State HCD's SB 35 Statewide Determination Summary (based on APR data received as of June 25, 2019), the County of Orange has not made sufficient progress towards its lower-income RHNA and is therefore subject to SB 35. The County is subject to streamlined ministerial approval review for proposed housing developments with at least 50% affordability.

Non-Governmental Constraints

Environmental Constraints

Environmental constraints include physical features such as steep slopes, fault zones, floodplains, sensitive biological habitat, and agricultural lands. In many cases, development of these areas is constrained by state and federal laws (e.g., FEMA floodplain regulations, the Clean Water Act, the Endangered Species Act, and the state Fish and Game Code and Alquist-Priolo Act). OC Public Works and other County agencies have the responsibility to enforce County policies and ordinances regulating development on flood plains, areas of potential seismic hazard, areas of excessive slope, conservation areas, areas with inappropriate conditions for septic tanks, and other environmental issues. Large portions of the remaining Unincorporated County have one or more of these constraints. These problems usually reduce the density allowed and bring into play mitigation measures and other necessary requirements, which add to the total cost of the project. OC Public Works has developed an environmental database with an extensive mapping system that is used in conjunction with the General Plan to facilitate a timely identification of environmental hazards and resources.

The County's land use plans have been designed to protect sensitive areas from development to the extent feasible, and to protect public safety by avoiding development in hazardous areas. Significant areas of sensitive habitat in the central, coastal, and southern portions of the County have been set-aside as permanent open space through adopted Multi-Species Habitat Conservation Plans. While these policies and plans constrain residential development to some extent, they are necessary to support other public policies.

Five major environmental conditions constrain development in Orange County: noise, floods, wildland fires, geologic/seismic hazards, and natural and cultural resources.

- **Noise:** The major sources of significant noise in Orange County are aircraft and highway vehicles. While both can usually be mitigated to acceptable levels indoors, aircraft noise cannot be mitigated outdoors because of its overhead source. State law and County policy prohibit residential development and similar noise sensitive uses in high-noise (+65 decibel Community Noise Equivalent Level – CNEL) areas near John Wayne Airport. Noise in non-residential developments must be attenuated to protect users in those areas. Near major streets and highways, noise must also be attenuated. Thus, high-noise conditions may preclude certain uses in some areas and may increase development costs.
- **Flood Hazards:** Portions of Orange County are located in floodplain areas of varying degrees of risk, subject to "100-" and "500-year" floods. In many cases, development can occur in these areas through proper site planning, although mitigation costs may be high. There are, however, some areas where development

in a floodplain is difficult and expensive to protect a project from extreme flood hazard.

- **Fire Hazards:** Large areas of Unincorporated Orange County are located within a high to very high fire hazard areas as defined by the California Department of Forestry and Fire Protection (CAL FIRE). CAL FIRE map areas of Very High or High Fire Severity Zone (FHSZ) within Local Responsibility Areas (LRAs) and State Responsibility Areas (SRAs). Development within FHSZ requires careful consideration of elements which may increase the risk of wildfires, such as vegetation, topography, and ember movement. Development in these areas is required to comply with the following construction requirements such as, but not limited to:
    - Fire sprinklers in all buildings
    - Ignition resistant construction materials
    - Class A roofing materials and assemblies
    - Defensible space
    - Two-lane street widths

  These requirements would increase development costs and would have an impact on the number of new housing units constructed within the FHSZ.
- In addition to higher construction costs, given that a few insurers have decided to not write new policies in California, homeowners living in fire-prone areas may find it more difficult to obtain affordable fire insurance as the fire season grows longer and wildfires grow in intensity every year in California.
- **Geologic/Seismic Hazards:** Like the entire Southern California region, Orange County is located within an area of high seismic activity. Potential slope and seismic hazards constrain development in certain parts of the County. While both conditions seldom preclude development, they may ultimately increase the cost of construction.
- **Natural and Cultural Resources:** The presence of natural or cultural resources on vacant land may influence its future use. For example, critical habitat areas or archaeological sites may require preservation or sensitive planning. Such conditions may preclude development or increase the cost of construction.

No environmental constraints have been identified on any 6th Cycle Housing Element candidate housing site.

Infrastructure Constraints

Many rapidly growing areas – especially southern portions of the County – have found it difficult to expand infrastructure fast enough to keep up with new development. Development places demands on all public services. It is the County's policy that the infrastructure for water, sewer, drainage, and roads be in place before urban development is permitted. One method for controlling the pace of growth is by limiting capital investment in these facilities. Simply, if the capacity is not available, the development cannot occur. In some cases where capacity is inadequate, private developers may be required to construct the backbone infrastructure or incremental upgrades to existing facilities to serve large developments. Because facilities require huge front-end capital expenditures, some form of municipal financing may be needed.

The network of man-made and publicly owned facilities, such as roads, streets, water, drainage, and sewer facilities form the internal framework, or infrastructure, of communities. The timing and pattern of installing these facilities (capital improvements) will play a part in the implementation of the County's General Plan by impacting the distribution of land uses.

Although capital facilities are built to accommodate present and anticipated needs, some (most notably water and sewer facilities, and roads) play a major role in determining the location, intensity, and timing of future developments.

OC Public Works provides services on a regional basis, to Unincorporated areas, and to other County agencies and departments. Chief among its regional services is providing flood protection countywide. OC Public Works operates and maintains the Orange County Flood Control District, a system of 350 miles of flood control channels, dams and other infrastructure that is continually built and expanded upon.

In lieu of considering individual projects or only those projects to be undertaken in a single year OC Public Works prepares and revises an annual Business Plan. The Business Plan projects annual expenditures for acquisition, construction, rehabilitation, and replacement of public facilities, such as flood control, Unincorporated roadway improvements, streetlights, traffic signals, agricultural commissioner and weights and measures programs, as well as the countywide system of harbors, beaches, and parks. Future growth in Orange County requires the delivery of adequate services to all residents in the Unincorporated County.

While infrastructure imbalances exist in all urban jurisdictions, these imbalances are typically addressed through development phasing, the use of developer agreements and other mechanisms. A brief summary of the principal infrastructure systems serving the County follows:

- **Water:** Approximately 50% of Orange County's water supply is imported into Southern California via the facilities of the Metropolitan Water District (MWD) of Southern California. MWD supplies are delivered by two principal facilities: (1) the Colorado River Aqueduct; and (2) the State Water Project. The rest of Orange County's water supply comes from underground aquifers, several small

groundwater basins, and recycled wastewater [14]. The groundwater supply is replenished by direct rainfall and other surface water that infiltrates into the ground, imported water purchased from MWD and recycled water.

The County of Orange has fourteen water districts and seventeen cities providing potable water to its residents and businesses. All these agencies purchase water through the Municipal Water District of Orange County (MWDOC) except for the cities of Anaheim, Fullerton, and Santa Ana which purchase directly from MWD. The County itself is not a provider of water. Rather Unincorporated areas are served by a variety of public and private providers.

Water supply has always been a critical issue for Southern California, with local sources of water providing less than half of the area's water needs. In addition to some other resources (such as petroleum or mineral extraction), the County lacks enough water resources to meet its own needs. The direct implication of this deficiency is that the County has become more dependent on imported resources and, as a consequence, is increasingly vulnerable to actions and policies which it cannot directly influence much the same way that local jurisdictions are unable to influence the pricing and availability of imported oil supply allocations.

To lessen the constraints of insufficient local capacity to meet the County's water demand, the majority of the necessary large-scale improvements within Orange County are projects to improve existing storage reservoirs or build additional storage facilities in south Orange County. The local water conveyance system will be implemented in conjunction with development phasing to meet the delivery demands in Orange County. Since 2008, the Groundwater Replenishment System Project, developed by the Orange County Water District (OCWD) and the Orange County Sanitation District (OCSD), has added 72,000 acre-feet to the groundwater basin every year. With increased water carrying capacity, this and other local and state/regional enhancements should lessen water-related constraints to new construction of housing in the Orange County market.

- **Sewer:** The collection, treatment, and disposal of wastewater in Orange County are undertaken by special districts and local governments. The County is not a provider of sewer service. The OCSD collects and treats wastewater for the northern and central areas of Orange County. There are seven districts that presently serve numerous cities plus Unincorporated areas within the Districts' boundaries. The Districts' facilities collect the sewage from local cities, sanitary districts, County water districts, and sewer maintenance districts. Wastewater is then transported through the Districts' trunk sewers to the two major treatment

[14] Source: https://www/mwdoc.com/wp-content/uploads/2017/05/Water-Supply.pdf

facilities located in Fountain Valley. In the South County, sanitation services are provided by the South Orange County Wastewater Authority (SOCWA). SOCWA has ten member agencies and owns or operates four treatment facilities. The authority for sewer services in Unincorporated areas not served by sanitary or water districts rests with the Orange County Board of Supervisors. The funding for sewer services is provided by property taxes, augmentation funds, user fees, or investment income from reserves.

With these complex, coordinated infrastructure systems, the ability of the various special sewer districts to expand treatment capacities in an incremental fashion, as well as to construct new facilities where needed, has facilitated its rapid growth.

Most wastewater management agencies have long-range plans to address needed plant expansion/upgrading, based on anticipated population growth within their service areas. As a result of these, and comprehensive water supply studies such as the County Water Plan, the County's wastewater/sewage infrastructure should not serve as a direct constraint to the production of housing to meet the anticipated demand from population growth.

- **Flood Control:** Orange County's flood control effort is divided among three major areas: Tri-County system (San Bernardino, Riverside and Orange Counties), regional system, and local drainage program. With respect to the regional system, the Orange County Flood Control District (OCFCD) is empowered to construct and maintain flood control works to prevent or minimize loss of life and property caused by flooding, and for water conservation. In the County's local drainage program, the storm drains are normally smaller facilities that collect drainage from local streets. In new developments, local drainage facilities are constructed by developers in accordance with master plans of drainage. In many older parts of Orange County, however, local systems were not built due to lack of major systems to accept their discharge. Limited funding from the County's General Fund or the Road Fund is used to implement local storm drains.
- **OC Public Works – Flood Programs** is responsible for implementing the Flood Control District's funded activities program, which includes the design, construction, operation, and maintenance of regional flood control facilities. Flood Control District revenue is obtained mainly from property taxes. The amount of Flood Control District revenue derived from property taxes is based on the average percentage received during the three years prior to the passage of Proposition 13, plus a proportionate share of the subsequent tax base growth. A main charge of the OC Public Works Flood Programs is providing flood protection countywide. The Santa Ana River Project is the largest and most

expensive such project. During 1999, for example, construction was completed on the Seven Oaks Dam and channel improvements throughout Orange County. These improvements now provide protection from flooding up to the 100-year magnitude for most of Orange County residents and businesses.

While not a direct constraint, the continued monitoring and implementation of the 1987 Clean Water Act will help guide new development, steering it away from areas that may be susceptible to flood damage. The County's available flood control infrastructure, along with continued flood plain management and successive implementation of the Flood Control District's master plan, should minimize any undue constraints to the production of affordable and/or market rate housing in the County.

Land Costs

Land represents one of the most significant components of the cost of new housing. Land values fluctuate with market conditions and the recent downturn in the housing market has affected land values negatively. Changes in land prices reflect the cyclical nature of the residential real estate market, and home prices and land values have experienced an increase in 2020 compared to previous years.

Land costs can also pose a significant constraint to the development of affordable and moderate-income housing and represents a significant cost component in residential development. Land costs may vary depending on whether the site is vacant or has an existing use that must be removed. Similarly, site constraints such as environmental issues (e.g., soil stability, seismic hazards, flooding) can also be factored into the cost of land. A July 2021 Zillow search for lots returned a number of properties ranging from $20 million for 35.96 acres east of Brea, $10,500,000 for 6,534 square feet in Emerald Bay, to $75,999 for 0.81 acres in Silverado Canyon. The average cost of land in Unincorporated Orange County is $20.89 per square feet. The holding cost of land during construction also adds to the price of housing. Holding costs vary depending on interest rates for acquisition and development loans. Interest rates are beyond the control of local jurisdictions. Reducing processing times for building permits in most jurisdictions can lessen land holding costs. However, the County's processing times are already among the most efficient in Orange County, and to reduce them further may compromise the County's ability to protect public health and safety.

Other factors affecting the costs of land include overall availability of developable lots within a given sub-region; environmental site conditions and constraints; public service and infrastructure availability; aesthetic considerations such as views, terrain, and vegetation; the proximity to urban areas; parcel size; and existing housing inventory. As a result of the proliferation of short-term rentals in the community, the County adopted short-term rental regulations to track and monitor these units as part of its Comprehensive Zoning Code Update adopted in July 2020. Since its

inception through June 30, 2023, 76 short-term rental permits have been approved; subsequently, the short-term rental regulations have a minimal impact on the cost and supply of housing.

Most importantly, land availability and permitted development density determine land prices. As land becomes scarcer, the price of land increases. And in related fashion, land prices have a positive correlation with the number of units permitted on each lot – that is, the more units permitted under General Plan land use guidelines, the higher the value of that land. In addition, more remote areas generally have less expensive (and larger tracts) of land, while smaller, more expensive parcels are typically located closer to urbanized areas. The County cannot control land prices, as they are set in the marketplace and are governed by such factors as speculation, demand, supply, and location.

Construction Costs

Construction costs vary widely according to the type of development, with multifamily housing generally less expensive to construct than single-family homes on a square-foot and per unit basis. However, there is variation within each construction type, depending on unit size and the quantity and quality of amenities provided. One indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The ICC was established in 1994 with the goal of developing a single set of national model construction codes, known as the International Codes or I-Codes. The ICC updates the estimated cost of construction at six-month intervals and provides estimates for the average cost of labor and materials for typical Type VA protected wood frame housing, which is commonly used in the construction of newer apartment buildings with no exposed wood visible. Estimates are based on "good-quality" construction, providing for materials and fixtures well above the minimum required by state and local building codes.

In August 2020, the ICC estimated the average per square foot cost for good-quality housing was approximately $118.57 for multifamily housing, $131.24 for single-family homes, and $148.44 for residential care/assisted living facilities. Construction costs for custom homes and units with extra amenities are higher. Construction costs are dependent upon materials used and building height, as well as regulations set by the County's adopted Zoning Code, Building Code, and Fire Code. For example, according to the ICC, constructing an accessory dwelling unit (ADU) or converting a garage space for residential use using a Type VB unprotected wood framed housing, which often has exposed wood so there is no fire resistance, would cost about $123.68 per square foot. Although construction costs are a significant portion of the overall development cost, they are consistent throughout the region and, when considering land costs, are not considered a major constraint to housing production in Orange County.

A reduction in the construction costs can be brought about in several ways. One such method is a reduction in amenities and quality of building materials in new homes (still above the minimum acceptability for health, safety, and adequate performance), which may result in lower sales prices.

State Housing Law provides that local building departments can authorize the use of materials and construction methods if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the applicable building codes.

Cost and Availability of Financing

The availability of financing affects a person's ability to purchase or improve a home. The availability of financing in a community depends on a number of factors, including the type of lending institutions active in a community, lending practices, rates and fees charged, laws and regulations governing financial institutions, and equal access to such loans. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. Lending activity is reviewed to determine if home financing is made available to all residents of a community. Data related to the disposition of loan applications submitted per the 2019 HMDA report from the Consumer Finance Protection Bureau for home purchase, home improvement, and refinancing in the Anaheim-Santa Ana-Irvine Metropolitan Statistical Area (MSA)/Metropolitan Division (MD) is contained below in **Table 3-9**.

Table 3-9
Disposition of Loan Applications by Race/Ethnicity
Anaheim-Santa Ana-Irvine MSA/MD

Applications by Race/Ethnicity	% Approved	% Denied	% Other	Total (Count)
LESS THAN 50% OF MSA/MD MEDIAN				
American Indian and Alaska Native	26.2%	52.3%	23.1%	65
Asian	33.9%	42.5%	26.7%	1,382
Black or African American	41.6%	33.7%	25.8%	89
Native Hawaiian or other Pacific Islander	25.0%	44.2%	30.8%	52
White	45.6%	31.2%	26.1%	5,240
Hispanic or Latino	37.9%	38.2%	26.8%	1,566
50-79% OF MSA/MD MEDIAN				
American Indian and Alaska Native	38.1%	34.0%	29.9%	97
Asian	53.3%	25.3%	29.4%	3,153
Black or African American	43.4%	19.1%	41.4%	152
Native Hawaiian or other Pacific Islander	49.4%	39.8%	16.9%	83
White	54.5%	23.3%	27.6%	8,677
Hispanic or Latino	47.6%	27.7%	29.3%	3,245
80-99% OF MSA/MD MEDIAN				
American Indian and Alaska Native	51.4%	25.7%	31.4%	35
Asian	59.5%	19.2%	29.3%	1,495
Black or African American	52.9%	22.1%	30.9%	68
Native Hawaiian or other Pacific Islander	43.5%	13.0%	43.5%	23
White	61.9%	17.2%	26.1%	3,873
Hispanic or Latino	54.0%	21.4%	29.1%	1,347
100-119% OF MSA/MD MEDIAN				

Table 3-9
Disposition of Loan Applications by Race/Ethnicity
Anaheim-Santa Ana-Irvine MSA/MD

Applications by Race/Ethnicity	% Approved	% Denied	% Other	Total (Count)
American Indian and Alaska Native	48.9%	22.7%	29.5%	88
Asian	62.3%	15.6%	28.8%	4,820
Black or African American	55.6%	20.1%	28.6%	234
Native Hawaiian or other Pacific Islander	49.4%	27.6%	31.0%	87
White	66.2%	13.8%	25.1%	12,607
Hispanic or Latino	60.8%	16.4%	26.8%	3,398
120% OR MORE OF MSA/MD MEDIAN				
American Indian and Alaska Native	59.2%	13.0%	32.0%	169
Asian	62.8%	12.9%	29.0%	17,800
Black or African American	57.7%	17.3%	27.2%	624
Native Hawaiian or other Pacific Islander	64.2%	11.4%	26.8%	254
White	68.3%	11.3%	24.9%	49,811
Hispanic or Latino	64.6%	13.3%	26.7%	6,095
Source: Consumer Financial Protection Bureau, Disposition of loan applications, by Ethnicity/Race of applicant, 2019.				

Lending practices are another economic factor that may influence access to housing opportunities. **Table 3-9** displays the disposition of loan applications for the Anaheim-Santa Ana-Irvine MSA/MD, per the 2019 Home Mortgage Disclosure Act (HMDA) report. Key findings, as shown in the table, include:

- Very low-income applicants (less than 50% of the MSA/MD median income) are more likely to have a loan application denied. The highest rates of denial were amongst those who identify as American Indian/Alaska Native (52.3%) and Native Hawaiian or Other Pacific Islander (44.2%).
- Above moderate-income applicants (at least 120% of the MSA/MD median income) experienced the highest rates of loan approvals. Within this income category, those who identify as White had the lowest percentage of denied applications (11.3%), while those who identify as Black or African American had the highest percentage of denials (17.3%).
- Across all income categories, applicants who identified as White had the highest rates of loan approvals.
- Overall, applicants who identified as White made the majority of all loan applications, followed by applicants who identified as Asian, then Hispanic, or Latino.

According to the data, above-moderate-income applicants (earning 120% or more of the MSA/MD median income) had the highest rates of loans approved. Of that income category, applicants who reported white had the highest percentage of approval and the number of applications. Very low-income applicants in the less than 50% of the MSA/MD median income categories showed higher percentages of denied loans than loans originated. According to the data, applicants who reported white were, on average, more likely to be approved for a loan than another race or ethnicity.

4. AFFIRMATIVELY FURTHERING FAIR HOUSING

California Assembly Bill 686 (AB 686) established new requirements for all California jurisdictions to ensure that local laws, programs, and activities affirmatively further fair housing. All Housing Elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of April 23, 2020. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the jurisdiction's fair housing enforcement and outreach capacity.
- An analysis of segregation patterns and disparities in access to opportunities.
- An assessment of contributing factors.
- An identification of fair housing goals and actions.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. Under State law, affirmatively further fair housing means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These characteristics can include, but are not limited to race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability. State law also prohibits discrimination in the development process or in real property transactions, and it is the County's policy to uphold the law in this regard.

On June 23, 2020, the Board of Supervisors approved the FY 2020-24 County of Orange Analysis of Impediments to Fair Housing (Orange County AI). The purpose of this document is to affirmatively further fair housing opportunities, and is required for communities that administer federal programs, such as Community Development Block Grant (CDBG), Emergency Solution Grant (ESG), and HOME Investment Partnership (HOME) grants.

The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with Orange County jurisdictions and with input from a wide range of stakeholders through a community participation process, prepared the Orange County AI. Stakeholders included tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal and social services providers, housing developers, and industry groups. The Lawyers' Committee met with stakeholders throughout the County, organized community meetings, and help focus group meetings with nonprofit organizations and government officials.

As included in the Orange County AI, the federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA), including FEHA Regulations, protects residents from discrimination on the basis of race, color, religion, national origin, sex/gender, handicap/disability, familial status, marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination.

The Orange County AI is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the FHA. The Orange County AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the Orange County AI lays out meaningful strategies that can be implemented to achieve progress towards the County's obligation to affirmatively further fair housing.

In summary, the Orange County AI recognizes that "[w]thin both Orange County and the broader Region, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, with monthly housing costs exceeding 50% of monthly income, than do non-Hispanic White households. In Orange County, Hispanic households are most likely to experience severe housing cost burden; in the Region, it is Black households." In the Orange County AI context, Orange County includes all areas and cities, not just Unincorporated areas.

As required by federal regulations, the Orange County AI draws from various federal, state, and local sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs.

The Orange County AI discusses two main impediments to fair housing: (1) public sector impediments which include housing discrimination, reasonable modifications and accommodations, and zoning regulations, and (2) private sector impediments, which include advertising, hate crimes, and real estate and lending practices. The analysis also examines publicly supported housing in each city as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The Orange County AI identifies contributing factors to fair housing issues and steps to be taken by each jurisdiction to overcome these barriers.

The Orange County AI is part of the basis of the County's Affirmatively Furthering Fair Housing analysis in this Housing Element. As a part of the Housing Element, the County considers protected class (such as race, ethnicity, income, etc.) and opportunity indicators as key factors in fair housing. Federal, state, and local data provide regional context, background information and supportive data which helps the County to understand fair housing issues and to identify key fair

housing factors for Orange County. The sections below use available data to identify key trends and local contributing factors to fair housing.

Fair Housing Outreach and Enforcement Capacity

The County has committed to complying with the following laws related to fair housing:

- **Title VI of the Federal Civil Rights Act of 1964**: provides that no person shall be excluded from participation, denied program benefits, or subject to discrimination based on race, color, and/or national origin under any program or activity receiving Federal financial assistance.
- **Title VIII of the Civil Rights Act of 1968** (The Federal Fair Housing Act): prohibits discrimination in housing on the basis of race, color, religion, sex, age, and/or national origin. This law also requires actions which affirmatively promote fair housing.
- **Section 109 of Title 1 of the Housing and Community Development Act of 1974**: provides that no person shall be excluded from participation (including employment), denied program benefits, or subject to discrimination on the basis of race, color, national origin, or sex under any program or activity funded in whole or in part under Title I of the Act.
- **Unruh Civil Rights Act:** protects residents from discrimination by all business establishments in California, including housing and accommodations.
- **Ralph Civil Rights Act** (California Civil Code Section 51.7): forbids acts of violence or threats of violence on the basis of race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute.
- **Bane Civil Rights Act (California Civil Code Section 52.1):** protects residents from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing.
- **California Civil Code Section 1940.3:** prohibits landlords from questioning potential residents about their immigration or citizenship status.
- **Government Code Sections 11135, 65008, and 65580-65589.8:** prohibit discrimination in programs funded by the State and in any land use decisions. Recent additions related to housing for special needs groups include Housing for persons with disabilities (SB 520); Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2); Housing for extremely low-income households, including single-room occupancy units

(California Assembly Bill 2634, AB 2634); Housing for persons with developmental disabilities (California Senate Bill 812, SB 812).

Outreach

In terms of outreach related to Fair Housing, the Unincorporated areas are served by the Fair Housing Council of Orange County (FHCOC), a private non-profit fair housing group, which is under contract to the County to administer a wide variety of fair housing services to residents of Unincorporated Orange County. FHCOC provides fair housing outreach services which include:

- Serving as a fair housing resource, including implementation of an affirmative fair housing marketing plan, testing, and complaint verification.
- Responding to citizen complaints regarding violation of fair housing laws.
- Providing tenant-landlord counseling.
- Promoting community awareness of tenant-landlord rights and responsibilities.
- Reporting quarterly to the County on complaint processing.
- Providing fair housing education to residents, County staff, community organizations, agencies, and service providers.
- Increasing awareness of affordable housing in high opportunity areas.
- Inhibiting displacement of low- and moderate-income residents, seniors, and people with disabilities.
- Increasing community integration for persons with disabilities.
- Ensuring equal access to housing for persons in protected classes, who are disproportionately likely to be lower-income and likely to experience homelessness.
- Expanding access to opportunities for protected classes.

On behalf of the County of Orange for the Unincorporated areas, the FHCOC investigates housing discrimination complaints, assists complainants with referrals to government enforcement agencies and assists in, or becomes a party to, litigation aimed at halting illegal discriminatory housing practices." Since 1965, the FHCOC has worked to eliminate housing discrimination and guarantee the rights of all people to freely choose the housing for which they qualify in the area they desire.

FHCOC provides programs such as fair housing enforcement and education, landlord/tenant counseling, and mediation and homebuyer HUD counseling for the County of Orange. For fiscal

year (FY) 2020-21, the County of Orange allocated $52,000 in CBDG funds to the FHCOC to perform the following outreach and enforcement for residents of the Unincorporated areas:

- Fair Housing Enforcement including the investigation of housing related discrimination complaints, assisting complainants with referrals to government enforcement agencies, and assisting with and/or becoming a party to, litigation aimed at halting illegal discriminatory housing practices.
- Fair Housing Training to residents, County staff, community organizations, agencies, and service providers.
- HUD Counseling to provide information on a wide range of topics including, but not limited to, rental assistance programs, mortgage default/foreclosure prevention, and the home buying process.
- Landlord/Tenant Counseling that provides counseling regarding housing rights, obligations and laws, and answers questions about the rights and obligations of landlords or tenants.

Fair housing services are offered by FHCOC via phone, email, or in-person at the FHCOC office in Santa Ana, CA. FHCOC provides language services to people whose primary language is not English as well as reasonable accommodation services to person with disabilities to ensure that fair housing assistance is accessible to all.

In addition, FHCOC held 32 training sessions for rental property owners/managers and presented 16 fair housing seminars and 70 general fair housing workshops to members of the public.

During 2021-2022, the FHCOC regionally conducted or participated in 67 virtual and 21 in-person education and/or outreach activities, reaching a culturally and ethnically diverse audience, in which they made participants aware of fair housing laws and counseling services (including services to help households improve their readiness for a home purchase). Because of the COVID-19 pandemic-driven need to engage with participants virtually, 52 of the virtual activities were not specific to residents of the Urban County jurisdiction, but they were all available to those residents.

Regionally, about 2,400 people were contacted or served by these activities during 2021-2022. Through its various regional outreach efforts FHCOC distributed over 19,800 information pieces on fair housing, its services, and other housing-related topics, in either English, Spanish or Vietnamese. A significant number of these items were distributed electronically, with the rest mainly distributed via mail or bulk delivery. Additionally, throughout Orange County FHCOC held 12 virtual training sessions for rental property owners/managers. FHCOC presented 2 virtual fair housing seminars for housing providers in cooperation with the Apartment Association of Orange County (AAOC). Nineteen general fair housing workshops intended for

participation by both/either housing consumers and/or providers throughout Orange County were provided. Due to the virtual nature of these workshops none were specific to residents of the Unincorporated areas, but they were largely available to those residents.

During 2021-2022, FHCOC continued efforts to promote housing affordability within Orange County. It provided services and outreach to organizations involved in the creation and preservation of affordable housing. These groups included the Kennedy Commission, Mental Health Association of Orange County, Radiant Health (formerly Aids Services Foundation), Affordable Housing Clearinghouse, Jamboree Housing Corporation, Mercy House, South County Outreach, Families Forward, Orange County Congregations Community Organizations, and Orange County Community Housing Corporation.

The FHCOC produces and provides written fair housing related materials in English, Spanish and Vietnamese to the persons in Orange County. FHCOC also undertakes specific virtual outreach efforts to immigrant populations in low-income neighborhoods. On a regional basis, an estimated 870 limited English proficiency (LEP) households were served during the 12-month program period in 2021-2022, through a combination of telephonic contact and virtual education and outreach activities. FHCOC also continued to implement activities under HUD Fair Housing Initiatives Program grants, for both education and outreach and fair housing enforcement. These program efforts specifically targeted fair housing services to persons with disabilities, minority groups and immigrant communities, especially immigrants with limited English proficiency. Program efforts included a fair housing testing program that sought to involve members of immigrant populations with limited English proficiency, both for purposes of enforcing fair housing laws as testers and as a vehicle to increase outreach to these populations.

Through its status as a HUD-approved Housing Counseling agency, FHCOC also assists individuals, including those with limited English proficiency (LEP), with various housing related problems. During 2021-2022, this included being available to counsel and assist those who had received loans with documents, all prepared in English, which had terms that were different from what they believed or were informed they were obtaining, or of which they had less than a full understanding. Many of the other counseling activities under its HUD-approved Housing Counseling also assisted individuals with LEP.

Fair Housing Enforcement

During the 2015-2019 reporting period, County-wide, the FHCOC staff received 363 allegations of housing discrimination countywide and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. In the Unincorporated areas, this included the successful resolution of the following complaints:

1. Protected Class Disability - Mental

Requesting Assistance for approval of reasonable accommodation to approve emotional support animal. The request was granted with no other issues pending and the case was closed.

2. Protected Class Race – White

3. Protected Class Race – White

4. Protected Class Race - White

These four complaints were filed with HUD. The complainants received a notice to terminate tenancy. This case was then forwarded to DFEH and mediated with a small monetary settlement for each complainant. All notices to terminate tenancy were rescinded and cases were closed.

During 2021-2022, on a regional basis, FHCOC staff performed 176 intakes regarding fair housing issues, which resulted in receipt of 128 allegations of housing discrimination and the opening of 61 case files, where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. FHCOC also counseled or informed another 67 clients regarding fair housing law and/or rights. Thirty intakes and 25 allegations arose from Orange County, resulting in the opening of 11 cases involving housing in Orange County (not Unincorporated areas specifically). On a regional basis, FHCOC also conducted 116 paired telephonic, systemic tests for discriminatory rental housing practices. An additional 8 paired systemic tests of real estate agents and 6 paired systemic pre-application tests of lenders were conducted telephonically. While all such systemic testing would normally be conducted in person, COVID-19 pandemic restrictions necessitated they be conducted via telephone only. Seventeen systemic rental tests involved locations in the Urban County jurisdiction. Furthermore, 20 paired telephonic or relay supported test were conducted regionally to assess discrimination of possible discrimination against housing seekers who are deaf or hard of hearing. FHCOC also conducted 5 assessments of compliance with accessibility requirements for persons with disabilities at covered multifamily properties built within the last two years.

On a regional basis, during 2021-2022, activities provided by FHCOC included assisting 3,168 unduplicated households addressing 9,875 issues, disputes and/or inquires.

During 2021-2022, on a regional basis, 15 inquiries regarding reasonable accommodations and modifications were received by FHCOC that resulted in casework beyond basic counseling. Overall, 10 of the 15 clients requested and received a reasonable accommodation, with 4 still pending and one where the client did not pursue the matter. Of those that are pending, any that are effectively and improperly denied will likely be referred as an administrative complaint filed with the Fair Housing and Equal Opportunity (FHEO) Office of the U.S. Department of Housing and Urban Development. Another 104 households were counseled on issues involving reasonable accommodation of a disability-related need at their housing.

Orange County rentals listed on Craigslist are also monitored by FHCOC for discriminatory content. Any discriminatory advertisements were flagged as prohibited and FHCOC responded to these ads through Craigslist's reply mechanism to inform the poster of possible discriminatory content. In most instances it was not possible to identify the property address and the identity of the individual making the posting. When possible FHCOC also brought these ads to the attention of Craigslist to hasten their removal, although the Craigslist reporting mechanism is no longer simple. When investigation was found to be feasible, the ad was referred to FHCOC's investigators for possible enforcement action. Other on-line rental advertising sites (e.g., OC Register, LA Times, Westside Rentals, Zillow, etc.) were sporadically monitored; however, the lack of an efficient text search function on these sites made monitoring them less practical. Without exception, among the 'apt / housing' Craigslist rental listings, the identified problematic postings indicated restrictions about children under the age of 18 or improper preference for seniors or 'older adults' for housing opportunities that did not appear to qualify as housing for older persons (age 55 and over). Overt racial or national origin discrimination in postings was not observed.

Advertising in the 'rooms / shared' area of Craigslist was observed to have a higher incidence of stated preferences that violated fair housing law. However, due to the practical aspects of resource limitations and case law considerations of shared housing situations, most were not acted upon. With the change in California law effective January 1, 2020, that expanded 'source of income' protections to individuals who use forms of housing rent assistance, such as the Housing Choice Voucher (often called 'Section 8'), FHCOC had previously identified numerous Craigslist postings that contained discriminatory language regarding the use of housing rental assistance. In the 2021-2022 program year, FHCOC did not find any Craigslist postings for Orange County rentals that discriminated against users of a Housing Choice Voucher, even though this continued to be an issue in other parts of Southern California.

FHCOC's website currently has an on-line housing discrimination complaint-reporting tool that generates an email to FHCOC. It is also used for other, non-discrimination, housing-related issues. The County of Orange has a link to the FHCOC website where residents can access this information.

Analysis of Federal, State, and Local Data and Local Knowledge

As a part of the Housing Element, the County considers protected class (such as race, ethnicity, income, etc.) and opportunity indicators as key factors that influence fair housing. Federal, state, and local data provide regional context, background information and supportive data which helps the County to understand fair housing issues and to identify key fair housing factors for Orange County. The section below uses available data to identify key trends and local contributing factors to fair housing.

The historical context for land use practices provides some background for current land use trends in Orange County. Orange County has a history of disenfranchisement beginning with Spanish colonialism and continuing with discriminatory policies and cultural norms blocking black, indigenous, and people of color communities from property ownership. (B*eyond Equity: Seeking Liberation, Autonomy and Justice in Orange County*, ("OC Equity Report 2021-2022") at p.14.) Spanish colonialism marked the first period of transformation of property rights. The network of missions, oppressive labor structures, conversion to Catholicism, Spanish cultural norms transformed indigenous property ownership and existence. (*Ibid*.) In 1821, when Mexico gained independence from Spain, ownership was transferred to Mexico and large Mexican landholders dominated property ownership in the "postcolonial" period from 1821 to 1850. (*Id.* at p. 15)

In the mid to late 1800s, the land that would become Orange County moved into a post-Mexican territory transition, in which wealthy white US settlers quickly dominated land, policy, and industry. In 1848, after California became a state, "[s]ome landowners of Spanish, Mexican, and indigenous descent who did not have paper records of ownership effectively lost their land at this time. In 1868, vast areas on either side of the Santa Ana River were placed on the market, and the towns of Santa Ana, Tustin, Orange, Westminster, and Garden Grove were soon founded. That same year, James Irvine purchased 1/5th of what would be Orange County. Later, in 1889, Assemblyman E.E. Edwards introduced a bill to create the County of Orange, which was officially formed that same year in August." (*Id.* at p. 15.)

In the twentieth century, Orange County has a history of redlining. "Redlining systematically prevented people of color from accessing services such as mortgages, insurance, loans, rental agreements or owning a home and settling in certain neighborhoods. Although such explicit redlining has waned, financial discrimination based on race/ethnicity still occurs, and the effects are lasting. Discrimination in banking still imposes barriers on [black, indigenous and communities of color] preventing true wealth accumulation." (*Id.* at p. 16.)

In the 1943 ruling in *Doss et al. v. Bernal et al.,* white neighbors lost their fight against Mexican and Spanish homeowners in a Fullerton neighborhood, when the court ruled that the deed held by the Bernals, which stated that "no portion of the said property shall at any time be used, leased, owned, or occupied by any Mexicans or persons other than of the Caucasian race," violated the equal protection clause of the 14th Amendment of the United States Constitution as well as the due-process clause of the Fifth Amendment. (*Id.* at p. 16.) Following this success, there have been periods of both oppression and resistance to affordable housing, which continue to some degree in Orange County.

As stated, in Orange County historical land use practices included the use of restrictive covenants in deeds that limited the ownership, lease/rent, etc. on the basis of race, color, age, religion, sex, gender, familial status, marriage status, disability, national origin, etc. As part of

new legislation, the County of Orange is systematically removing such covenants in deeds. Unlawful restrictions in deeds include those restrictions based on age, race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, familial status, marital status, disability, genetic information, national origin, source of income as defined in subdivision (p) of Section 12955, veteran or military status, or ancestry.

Government Code section 12956.2(a) provides that any deed or other recorded instrument that contains unlawfully discriminatory language forbidding or restricting the right of any person to sell, buy, lease, rent, use, or occupy the property on account of any of the characteristics specified above, may be revised to remove such unlawful language. A person who holds an ownership interest in property that believes the property is the subject of an unlawfully restrictive covenant may submit for recordation a Restrictive Covenant Modification document. If the existence of unlawfully restrictive language is confirmed by County Counsel, the modification document is recorded with the unlawful restrictive covenant redacted. In addition, the Orange County Clerk-Recorder in collaboration with County Counsel will identify such deeds and remove unlawful language and record a redacted covenant. See Housing Action Plan Program 8.

For the period between 1889-1981, the County of Orange identified approximately 48,000 records that contain unlawfully discriminatory language. Of those, to date, 13,000 restrictive covenants have been modified by the Clerk-Recorder. The process remains ongoing. Most of the unlawfully discriminatory covenants restrict the sale, use, lease, etc. of properties to white persons. The unlawful restrictions are contained in deeds for properties all over Orange County; however, a concentration of unlawful deed restrictions was found in Santa Ana/Orange/Anaheim between 1889-1926, as this area was the population center for Orange County in 1889 when the County was incorporated.

Integration & Segregation Patterns & Trends

The integration and segregation pattern discussion focuses on people with the following protected characteristics

- Race and Ethnicity
- Disability
- Familial Status
- Income

Race and Ethnicity

The dissimilarity index is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The

index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration of that group. An index score can range in value from 0%, indicating complete integration, to 100%, indicating complete segregation. An index number above 60 is considered to show high similarity and a segregated community.

It is important to note that segregation is a complex topic, difficult to generalize, and is influenced by many factors. Individual choices can be a cause of segregation, with some residents choosing to live among people of their own race or ethnic group. For instance, recent immigrants often depend on nearby relatives, friends, and ethnic institutions to help them adjust to a new country. Alternatively, when White residents leave neighborhoods that become more diverse, those neighborhoods can become segregated. Other factors, including housing market dynamics, availability of lending to different ethnic groups, availability of affordable housing, and discrimination can also cause residential segregation.

Figure 4-1 shows the dissimilarity between each of the identified race and ethnic groups and in Santa Ana-Anaheim-Irvine, CA Metropolitan Division's population. The higher scores indicate that the two groups tend to live in different tracts. The White population within Orange County makes up most of the County's population with approximately 61% identifying as White alone (non-Hispanic or Latino) according to 2019 American Community Survey (ACS) 5-Year estimates.

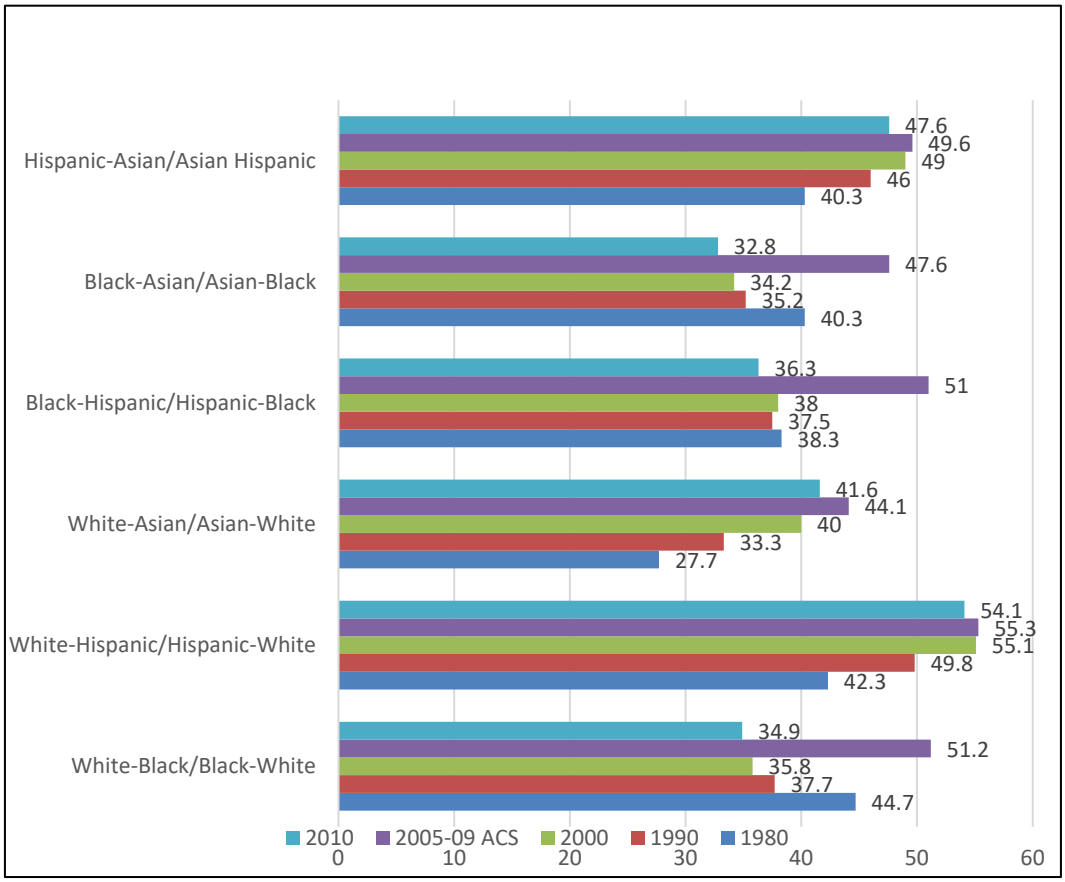
Those who identify as Hispanic, and White were the most likely to live in different tracts. In 1990, White-Hispanic dissimilarity was 42.3 and increased to 54.1 in 2010 both considered a moderate level of segregation. While those who identify as Black and Asian were less likely to live in different tracts. In 1990 White-Asian dissimilarity was 40.3 which was considered a moderate level of segregation while in 2010 the dissimilarity decreased by 7.5 and is considered to be fairly low.

Similarly, to the Santa Ana-Anaheim-Irvine, CA Metropolitan Statistical Area, the San Diego-Carlsbad-San Marcos, CA Metropolitan Statistical Area the population who identified as Hispanic and White were the most likely to live in different tracts. In 1990 White-Hispanic dissimilarity was 41.8 and increased to 49.6 in 2010 both considered a moderate level of segregation. The San Diego-Carlsbad-San Marcos, CA Metropolitan Statistical Area's population who identified as Black and Hispanic were less likely to live in different tracts. In 1990 Black-Hispanic dissimilarity was 49.6 and decreased to 36.7 in 2010 both considered a moderate level of segregation.

The California Department of Housing and Community Development (HCD) considers dissimilarity index scores above 30 as moderate segregation and scores above 60 high segregations. In 2020, as shown by **Figure 4-1**, there were no areas of segregation in the Metropolitan area. While the County has no racial or ethnic populations with a dissimilarity index above 60, all populations aside from those identifying as two or more races have a score

above 30. This means almost all groups experience moderate segregation from the White population. While segregation may be a result of ethnic enclaves or persons of similar cultures living nearby, there is often increased likelihood that segregated areas have fewer access to essential resources. As part of the County's efforts to further fair housing, the County will consider increased targeted outreach to the County's minority residents.

Figure 4-1
Dissimilarity Index with White Population in
Anaheim - Santa Ana- Irvine, CA Metropolitan Division



Source: Brown University, Spatial Structures in the Social Sciences

Table 4-1
Dissimilarity Index Values by Race and Ethnicity for Orange County

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current (2020)
Non-White/White	30.38	34.71	33.58	44.71
Black/White	32.60	33.63	32.27	46.98
Hispanic/White	36.13	41.08	38.18	52.82
Asian or Pacific Islander/White	32.58	34.31	34.82	43.19
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020				

As shown in **Table 4-1** above, overall, Orange County experiences moderate levels of segregation, with significant variances in some individual jurisdictions. The current (2020) Non-White/White value is 44.71, Black/White 46.98, Hispanic/White 52.82, and Asian or Pacific Islander/White 43.19. These values have all increased since 2010, though values had remained consistent from 2000 and 2010. Jurisdictional values tend to indicate low levels of segregation in comparison to Orange County as a whole, but this is due to the spatial distribution of populations across different jurisdictions rather than within different jurisdictions. Areas in central Orange County have the highest Dissimilarity Index values for their populations. Cities of Orange, Santa Ana, and Tustin are particularly affected.

In addition to the Dissimilarity Index, social scientists also use the Isolation and Exposure Indices to measure segregation.

Table 4-2
Isolation Index Values by Race and Ethnicity, Orange County

Isolation Index	Current (2020)
White/White	55.16
Black/Black	3.32
Hispanic/Hispanic	52.81
Asian/Asian	31.84
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020	

These indices, when taken together, capture the neighborhood isolation values for different populations vary widely across the county and individual jurisdictions. Values for White residents are generally higher than for other residents, likely due to the larger number of White residents overall. In Orange County, White residents have an Isolation Index value of 55.16, Black residents 3.32, Hispanic residents 52.81, and Asian residents 31.84. Values for the county are sometimes higher than values in individual jurisdictions for White, Hispanic, and Asian residents, again likely due to higher segregation across jurisdictions rather than within them. Isolation values have generally decreased for White residents over time, increased for Hispanic

and Asian residents, and remained low for Black residents. Hispanic residents have experienced the highest Isolation Index value change over the last few decades. This is partly due to the increasing size of the population in the county.

Contributing factors to segregation include:

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific, neighborhoods, including services and amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Lack of public investment in specific, neighborhoods, including services and amenities[15].

Disability

Persons with disabilities also experience housing access disparities. As shown by **Table 4-5**, nearly 8.5% of Orange County residents have a physical or developmental disability, with a slightly lower percentage, 7.8% in Unincorporated areas. Both of these percentages are lower than the State as a whole. Persons with disabilities may require different features in a home to make housing more accessible, this includes, but is not limited to, ramps rather than stairs, lower and within-reach countertops, and other specific design features. Overall, Orange County, as a whole, has lower percentages of persons with disabilities compared to the State. Persons with ambulatory difficulties (a physical and permanent disability to such a degree that the person is

[15] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

unable to move from place to place without the aid of a wheelchair) and independent living difficulties represented the largest percentages of persons with disabilities in Orange County; this is the same for California as a whole.

Table 4-3
Population by Disability Type

Disability*	Unincorporated Areas	Orange County	California
Hearing Difficulty	2.5%	2.5%	2.9%
Vision Difficulty	1.5%	1.5%	2%
Cognitive Difficulty	2.5%	3.4%	4.3%
Ambulatory Difficulty	3.5%	4.5%	5.8%
Self-Care Difficulty	1.3%	2.2%	2.6%
Independent Living Difficulty	3.0%	4.3%	5.5%
Total with a Disability	**7.8%**	**8.5%**	**10.6%**

**Total of noninstitutionalized population with at least one disability.*
Source: American Community Survey, 5-Year Estimates, 2019

Table 4-4
Persons with At Least One Type of Disability
Unincorporated Areas

Unincorporated CDP or Area	Total Persons	Persons with a Disability	% of Persons with a Disability	No. of Land Inventory Sites (Parcels)
Coto de Caza CDP	15,509	657	4.2%	0
El Modena Area	12,214	1,140	9.3%	181
Ladera Ranch CDP	24,913	1,532	6.1%	0
Las Flores CDP	5,089	235	4.6%	0
Midway City CDP	8,671	1,609	18.6%	35
Modjeska Canyon CDP	834	44	5.3%	0
North Tustin CDP	25,078	2,284	9.1%	2
Orange-Olive Area	14,018	1,115	8.0%	58
Rancho Mission Viejo CDP	7,816	385	4.9%	14
Rossmoor CDP	11,923	980	8.2%	6
Silverado CDP	740	96	13.0%	0
Stanton Area	6,347	719	11.3%	2
Trabuco Canyon CDP	1,223	239	19.5%	0
West Anaheim Area	16,512	1,616	10.0%	27
Williams Canyon CDP	108	17	15.7%	0

Source: American Community Survey 5-Year Estimates 2020
Note: Data available for Unincorporated CDPs only, not entire Unincorporated area.

The Unincorporated County areas can also be analyzed at the tract-level. For the purposes of this analysis, the Unincorporated County areas have been divided into three sections, North, Central, and South County. North Orange County is generally the area north of California Highway 22, north of the cities of Garden Grove and Santa Ana, and west of Highway 241. Central Orange County encompasses the area south of California Highway 22 and is bound by Highway 241 to the east and extends to include the City of Newport Beach. The data presented for the Unincorporated County subareas is based on tracts in the Unincorporated County. It is relevant to note that some tracts may encompass the Unincorporated County as well as part of an incorporated City, therefore the data is not a perfect representation of the Unincorporated County alone. However, this data serves to present general trends in the Unincorporated County and ACS data itself is only an estimate. **Table 4-5** below shows populations of persons with disabilities in these subareas based on tract-level data.

According to the 2022 ACS (5-year estimates), 8.1% of the Central Orange County population experiences a disability, 9.7% in North Orange County, and 6.9% in South Orange County. In the Unincorporated County as a whole (all three Unincorporated subareas), 8.1% of the population experiences a disability. Over the past ten years, the population of persons with disabilities has increased in all Unincorporated subareas (Central, North, and South) and the Unincorporated area as a whole. According to the 2012 ACS (5-year estimates), only 7.2% of persons in Central Orange County, 8% in North Orange County, and 4.9% in South Orange County experienced a disability. Throughout the Unincorporated County areas, based on tract-level data, only 6.7% of persons experienced a disability in 2012 compared to 8.1% in 2022. Populations of persons with disabilities tend to correlate with elderly populations as elderly persons are more likely to experience disabilities compared to younger age groups. According to the 2022 ACS, 15.4% of the population is 65 or older Countywide compared to only 11.7% in 2012. The

As shown in **Table 4-5** below, ambulatory difficulties are the most common disability type in all three County subareas. In the Central County area, the non-Hispanic White population has the largest disability rate (9.4%) while the Native Hawaiian and other Pacific Islander populations have the highest disability rates in North and South Orange County (14.9% and 19.6%, respectively). Elderly populations are more likely to experience disabilities. Consistent with this trend, 38.8% of persons aged 75 and older in Central Orange County, 46.7% in North Orange County, and 41.2% in South Orange County experience one or more disabilities. As shown in **Figure 4-5**, there tends to be larger elderly populations in coastal areas.

Table 4-5
Persons with Disabilities by Subpopulation and Unincorporated Areas

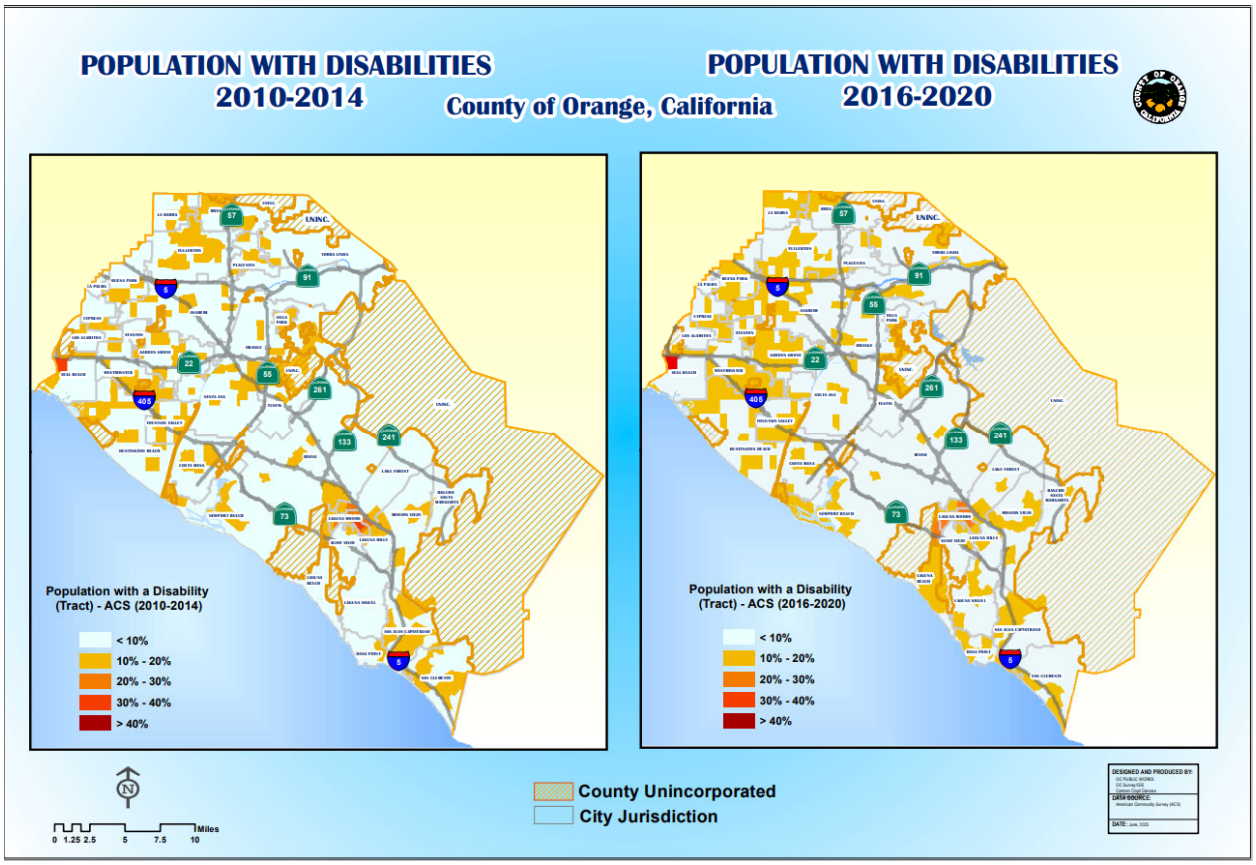
Subpopulation	Central OC	North OC	South OC	Unincorporated Areas
Persons with Disabilities by Type (of total area/subarea population)				
Hearing difficulty	2.2%	2.8%	2.2%	2.4%
Cognitive difficulty	2.8%	3.6%	2.3%	2.9%
Vision difficulty	1.3%	1.6%	1.1%	1.3%
Ambulatory difficulty	3.6%	4.6%	2.9%	3.6%
Self-care difficulty	1.8%	2.4%	1.4%	1.8%
Independent living difficulty	3.0%	3.8%	2.0%	2.9%
Persons with Disabilities by Race/Ethnicity (of total racial/ethnic group)				
Black/African American	6.5%	11.2%	4.8%	7.3%
American Indian and Alaska Native	8.5%	7.3%	6.9%	7.5%
Asian	9.0%	7.8%	4.7%	6.9%
Native Hawaiian and Other Pacific Islander	4.4%	14.9%	19.6%	13.4%
Some other race	5.0%	10.2%	6.4%	7.5%
Two or more races	7.3%	8.9%	5.9%	7.4%
Non-Hispanic White	9.4%	12.6%	7.9%	9.4%
Hispanic/Latino	5.5%	8.2%	6.2%	6.9%
Persons with Disabilities by Age (of total age group)				
<5 years	2.2%	2.0%	0.4%	1.3%
5-17 years	3.7%	4.7%	3.6%	4.0%
18-34 years	5.0%	4.7%	2.9%	4.2%
35-64 years	6.0%	7.3%	5.3%	6.1%
65-74 years	13.1%	19.4%	13.1%	15.1%
75+ years	38.8%	46.7%	41.2%	42.4%
Total population of persons with disabilities	***8.1%***	***9.7%***	***6.9%***	***8.1%***
Total civilian noninstitutionalized population	**208,808**	**242,613**	**294,904**	**746,325**

Source: American Community Survey, 5-Year Estimates, 2022
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

Additionally, **Figure 4-2** below displays the population in all of Orange County with a disability by census tract. The data shows that in 2010 a majority of the census tracts had less than 10% of

the population who reported a disability, with pockets of 10 to 20% in the northwest region of Orange County. Comparatively, the data displaying 2015-2019 data shows that most census tracts had increased populations who reported a disability, approximately 10 to 20%, and in some cases, 20 to 30%. Additionally, the maps show a pocket of census tracts in the Lake Forest area with a higher percentage of persons with disabilities. In 2010-2014 the data shows a mix of 20 to 40% of the population reporting a disability, whereas in 2015-2019 that area decreased in size but increased in the percentage of population reporting a disability.

Figure 4-2
Persons with Disabilities in Orange County, 2010-2014 (Left) and 2015-2019 (Right)



Source: Esri, HERE, Garmin, USGS, NPS|Placeworks 2021, ESRI, U.S. Census|Placeworks 2021, TCAC 2020|Placeworks 2021, CA HCD

Both maps demonstrate that the highest concentrations of populations reporting a disability have consistently remained within incorporated cities over the course of the past 20+ years, with only small pockets of the Unincorporated County area reporting populations with a disability. The pockets of the Unincorporated County area did not migrate or shift between 2010 and 2020. However, those portions of the Unincorporated County area shrunk between 2010 and 2020 and continue to represent only a small fraction of the population in Orange County as a whole reporting a disability.

Consistent with this, the 2016-2020 data presented in **Figure 4-2** shows that the areas with the highest concentration of populations reporting a disability are present outside of the Unincorporated area. Within the Unincorporated County area, the Unincorporated islands of Midway City, El Modena, West Anaheim, Stanton, Orange-Olive, North Tustin, and the Unincorporated areas along the outskirts of the cities of Brea and Yorba Linda appear to have the highest concentration of populations reporting a disability. All of these areas correspond to relatively high opportunity areas and high resource areas, and while they have some overlap with other protected characteristics, the overlap is not concentrated or consistent with any specific protected characteristics. This indicates that there has been little movement over the past decade in terms of where populations reporting a disability reside within the Unincorporated County area, and that populations reporting a disability within the Unincorporated County area have generally high access to resources and good access to opportunities, on par with other populations within the Unincorporated County area.

In Orange County, there are 104 Other Multifamily Housing and 4,090 Project-Based Section 8 units that are subject to Section 504 of the Rehabilitation Act, which requires that federally financed housing developments have 5% of total units be accessible to individuals with mobility disabilities and 2% be accessible to individuals with sensory disabilities. 81 people with disabilities reside in Multifamily Housing, and 549 reside in Project-Based Section 8 units. At this time, it is unknown how many accessible units are in Project Based Section 8 units. There 5,045 people with disabilities that reside in units assisted with Housing Choice Vouchers in Orange County. According to the California Tax Credit Allocation Committee (CTCAC)'s Low Income Housing Tax Credit (LIHTC) database, there are 158 LIHTC developments currently in service. In these 158 developments, there are 16,201 affordable units. These developments were put into service after 1991, meaning that they have all been built according to 1991 Fair Housing Act accessibility requirements.[16]

Based on available data, the supply of affordable, accessible units in Orange County as a whole is insufficient to meet the need. In the County, some 81,297 residents have hearing difficulty, 51,196 residents have vision difficulty, and 133,232 residents have ambulatory difficulty, potentially requiring the use of accessible units. Meanwhile, the data indicates there may be roughly 75,660 units that have been produced subject to the Fair Housing Act's design and construction standards and approximately 4,000 units within developments that must include accessible units subject to Section 504. There is, without question, some overlap between these

[16] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

two categories, some of these units are likely non-compliant, and some accessible units are occupied by individuals who do not have disabilities. [17]

As noted in Section 2, **Table 4-4,** and above, however, the Unincorporated County areas that this Housing Element addresses, do not host a large population of disabled persons. The units available currently likely address the needs of the smaller disabled population in the Unincorporated County areas and thus, this need is lower priority than the need for affordable, elderly, and multifamily housing.

Familial Status

Table 4-6 displays the familial status, or household type, for Unincorporated County areas, Orange County, and the State. Amongst the three jurisdictions, households categorized as "family" made up the largest percent of households overall. Unincorporated County areas and Orange County have a higher percentage of family households than the state. Family households with children represent the same percentage for Orange County as the State and represent larger percentages than non-family households.

Table 4-6
Population by Familial Status

Familial Status	Unincorporated CDPs	Orange County	California
Family Households	83.4%	71.7%	68.7%
Married-Couple Family Households	70.7%	54.9%	49.8%
With Related Children Under 18	35.6%	34.1%	34%
Female Households, No Spouse	9.4%	11.5%	13%
Non-Family Households	16.6%	28.3%	31.3%
Households with One or More People 60 Years+	39.8%	39.9%	39.1%
Total Households	**29,938**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-Year Estimates, 2019.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 4-7 below displays income, household type, and number of proposed housing sites for each Unincorporated County area. The Unincorporated County areas with the lowest incomes have the highest percentages of single parent households and the areas with the highest incomes also have the highest percentages of married family households.

[17] *Id.*

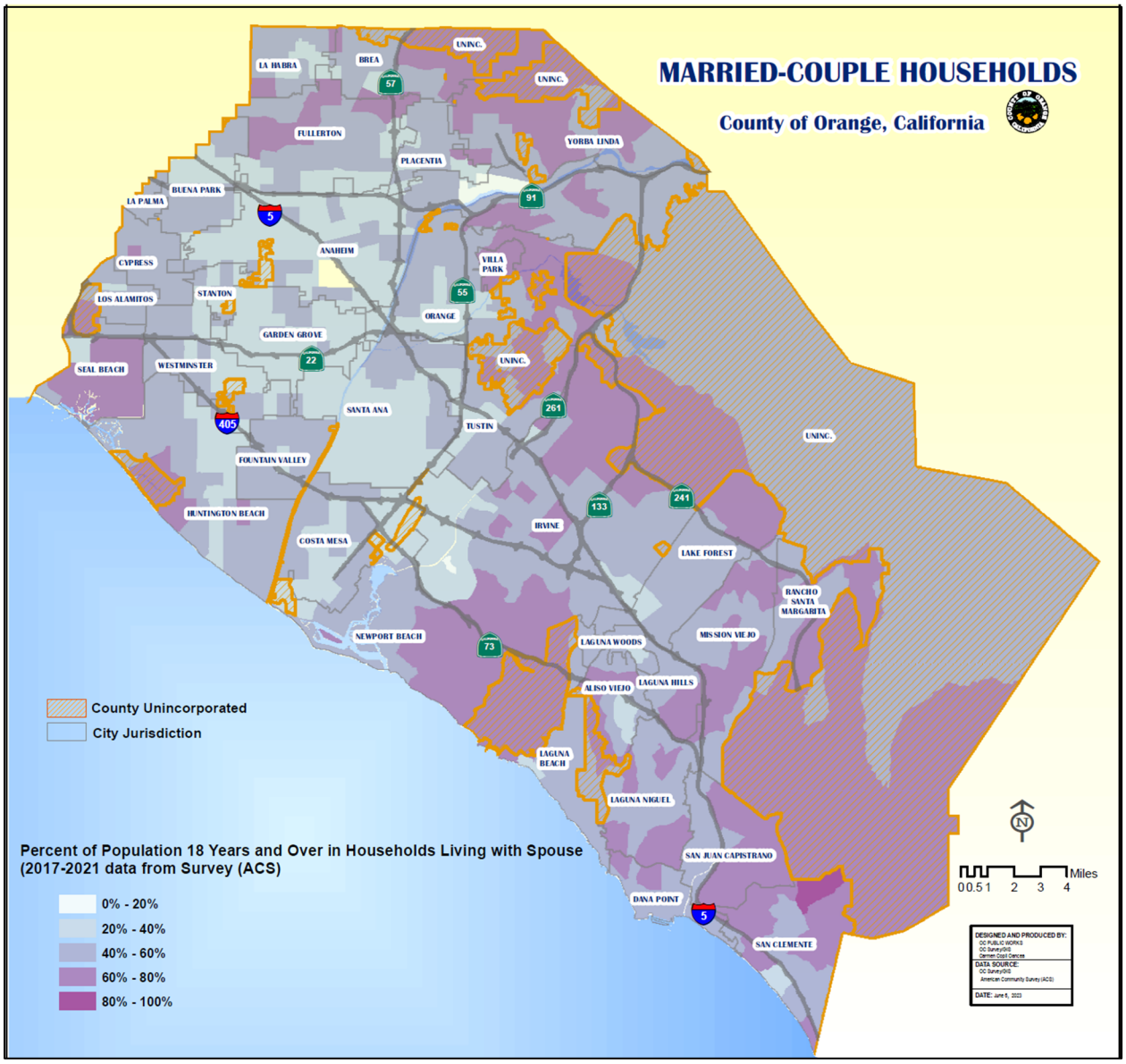
Table 4-7
Population by Familial Status of Unincorporated Areas

Unincorporated CDP or Area	% of Area Median Income (AMI)	Family Status			No. of Land Inventory Sites (Parcels)
		% Married Couple	% Female Head of Household	% Male Head of Household	
Coto de Caza CDP	210	81	7.8	5.5	0
El Modena Area	110	59	21	11.6	181
Ladera Ranch CDP	169	65	21	9.2	0
Las Flores CDP	147	61	18.7	6.3	0
Midway City CDP	48	46	28.6	23.8	35
Modjeska CDP	103	78	13.6	3.8	0
North Tustin CDP	157	70	17	7.9	2
Orange-Olive Area	129	61	10	6	58
Rancho Mission Viejo CDP	152	66	28	4.1	14
Rossmoor CDP	153	67	19.3	10.1	6
Silverado CDP	90	34	30	26	0
Stanton Area	70	31	31	12.6	2
Trabuco Canyon CDP	164	70	10	10.3	0
West Anaheim Area	72	47	28.5	14.3	27
Williams Canyon CDP	N/A	100	0	0	0

Source: American Community Survey, 5-Year Estimates, 2021.
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

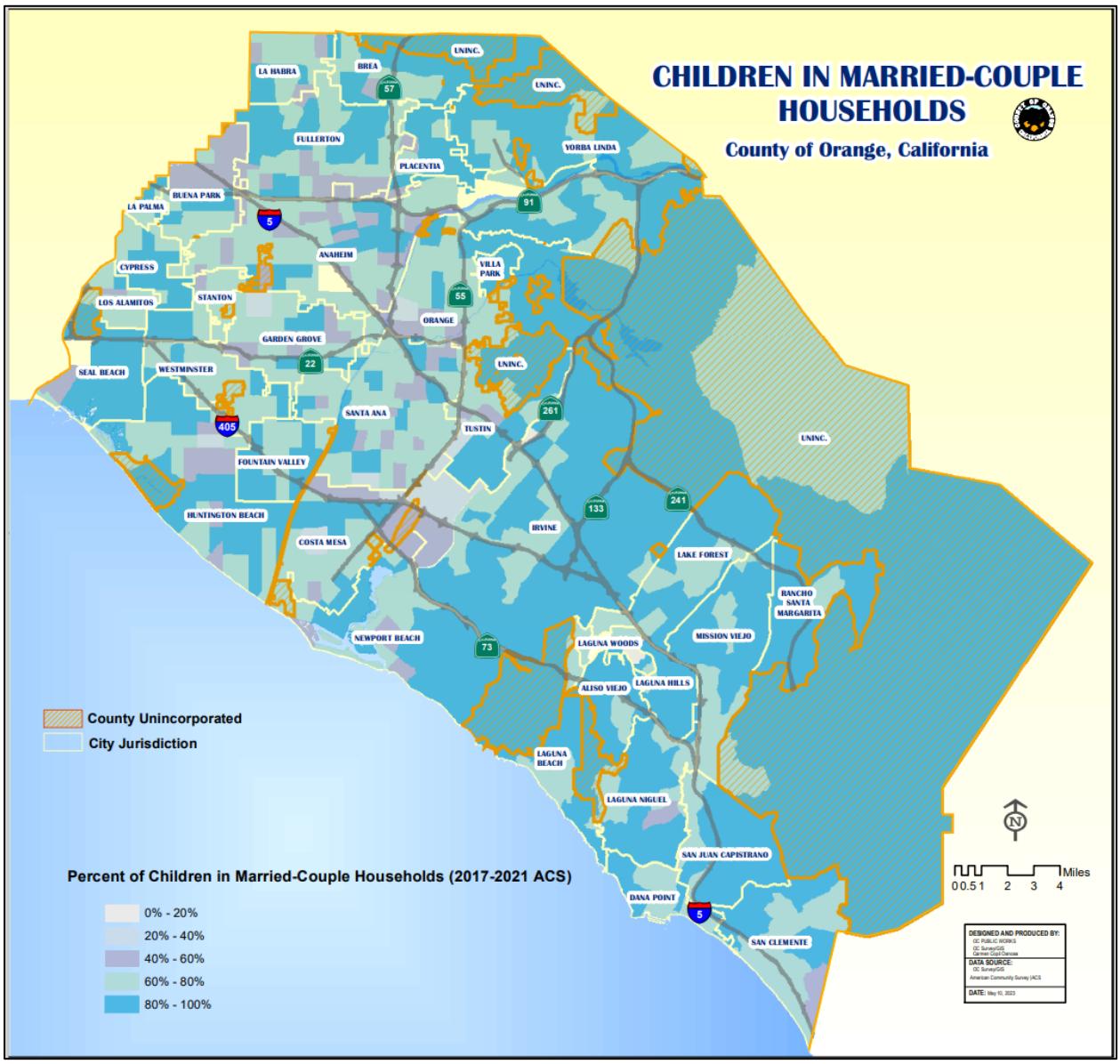
Figures 4-3 through **4-5** below show household type and familial status geographically across Orange County, including the Unincorporated County areas. As the maps demonstrate, the coastal, south Orange County and inland/foothills areas have the highest concentrations of married households and married households with children. The central areas of the County have greater percentages of unmarried and/or female only headed households.

Figure 4-3
Married-Couple Households



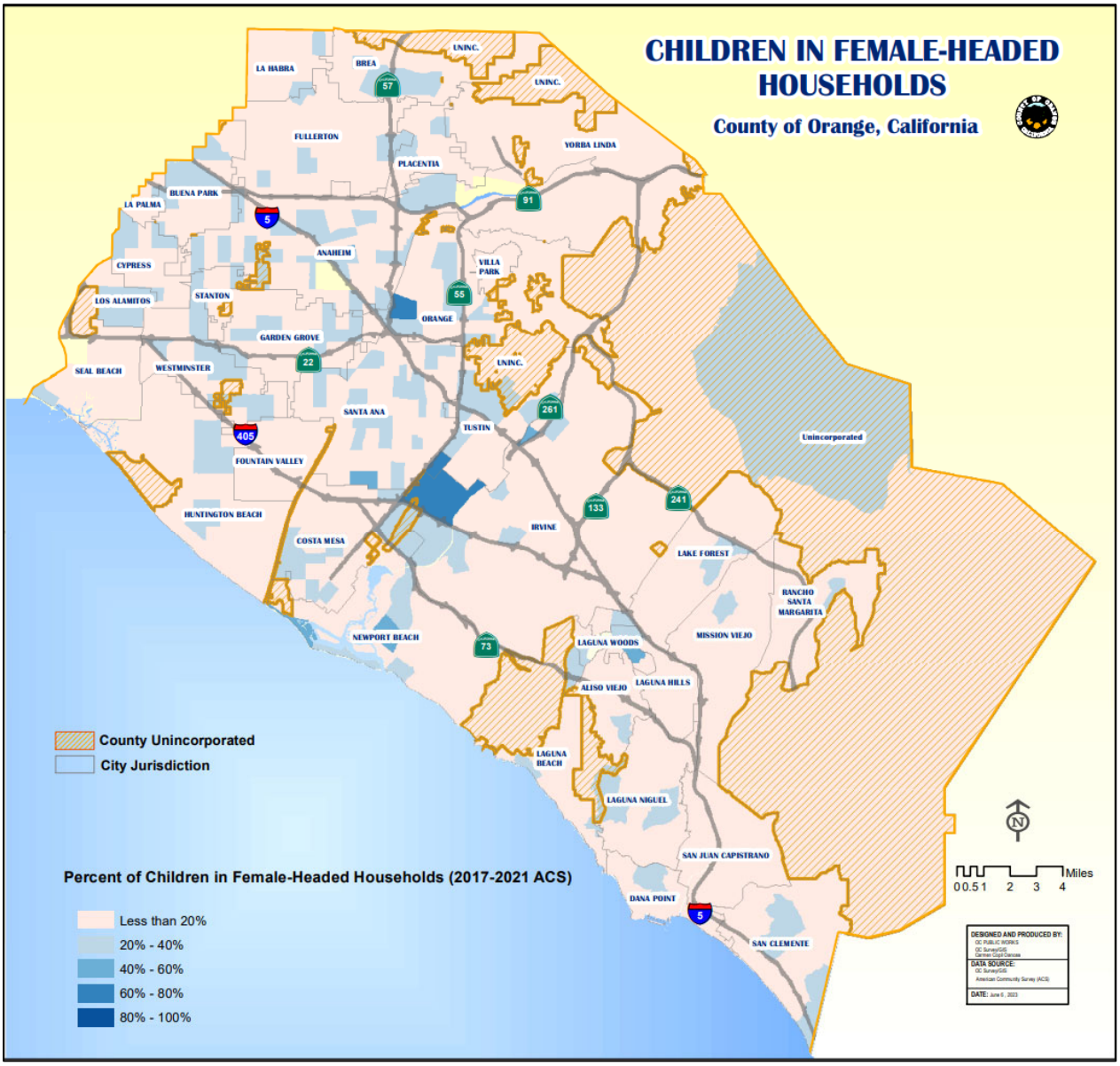
Source: HCD AFFH Data Viewer, 2022

Figure 4-4
Children in Married-Couple Households



Source: HCD AFFH Data Viewer, 2022.

Figure 4-5
Children in Female-Headed Households



Source: HCD AFFH Data Viewer, 2022

As discussed in the *Populations of Persons with Disabilities* subsection, for the purposes of this analysis, the Unincorporated County areas have been split into subareas: Central, North, and South Orange County. The following analysis is based on Unincorporated County area tract-level data using the 2022 and 2012 ACS (5-year estimates).

As shown in **Table 4-8**, approximately 30.6% of households in the Unincorporated County areas consist of both the householder and their children. The South County area has the largest proportion of households with children (32.9%) compared to the North County (31.5%) and Central County (26.4%). Over the last ten years, the proportion of households with children has decreased in the Unincorporated County areas, including in all subareas. According to the 2012 ACS, 35.8% of households in the Unincorporated County areas had children of the householder, including 29.6% in Unincorporated Central Orange County, 36% in Unincorporated North Orange County, and 42% in Unincorporated South Orange County.

Married couple families represent more than half of households in all Unincorporated County subareas. The North County subarea has a larger proportion of single-parent female-headed households (4.9%) compared to the Central County subarea (3.4%) and South County subarea (3.7%). Approximately 2% of households in Central and North County are single-parent male-headed households compared to 1.4% of households in the South County.

Table 4-8
Households by Familial Status/Children of Unincorporated Subareas

	Central OC	North OC	South OC	Unincorporated Areas
Married-couple family	51.7%	58.4%	61.8%	57.9%
With children	20.9%	24.4%	27.8%	24.8%
Single male-headed	5.8%	6.0%	3.5%	4.9%
With children	2.2%	2.2%	1.4%	1.9%
Single female-headed	9.5%	12.2%	7.9%	9.6%
With children	3.4%	4.9%	3.7%	4.0%
Nonfamily household	32.9%	23.4%	26.9%	27.6%
Total households with children	***26.4%***	***31.5%***	***32.9%***	***30.6%***
Total households	**74,734**	**76,535**	**108,095**	**259,364**

Source: American Community Survey, 5-Year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Income Status

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51% of the population is LMI (based on HUD income definition of up to 80% of the Area Median Income).

The average income amongst census tracts that include Unincorporated County areas is $173,274. The Unincorporated South Orange County area has the highest average income of $207,678 compared to Central ($162,640) and North Orange County ($145,589). The median income for Unincorporated County areas is $134,282. According to the 2022 ACS, Orange County as a whole (incorporated and Unincorporated County areas) has a median household income of $109,361 and an average household income of $147,182. Over the last decade, the household incomes in the Unincorporated County areas have increased. According to 2012 ACS estimates, the average income in Unincorporated Central County was $112,057, $101,759 in North County, and $143,173 in South County. The average household income in the Unincorporated County areas as a whole was $118,354 and the median household income was $83,850.

Compared to other counties in the region, the median and average household incomes in Orange County, including in the Unincorporated County areas, are higher than in Los Angeles County ($83,411 and $119,756, respectively), Riverside County ($84,505 and $110,021, respectively), San Bernardino County ($77,423 and $100,078, respectively), and San Diego County ($96,974 and $129,234, respectively).

According to 2023 HCD State Income Limits, the Area Median Income (AMI) for Orange County is $127,800 for a four-person household.[18] State income limits for a four-person household in Orange County are as follows:

- $114,800 or less – Lower-Income
- $114,800 - $127,800 – Median
- $127,800 - $153,350 – Moderate-Income
- >$153,350 – Above-Moderate-Income

Only 42.3% of households in the Unincorporated Central area, 45.3% in the Unincorporated North area, and 32% in the Unincorporated South area earn less than $100,000. A large proportion of households in all subareas earn more than $150,000 and would be considered

[18] California Department of Housing and Community Development (HCD). 2023. 2023 State Income Limits. https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2023.pdf.

above-moderate-income households, including 37.7% in the Central subarea, 36.9% in the North subarea, and 50.6% in the South subarea.

As discussed above, the North subarea, with the largest proportion of households earning less than $100,000, also has the largest proportion of single-parent female-headed households and population of persons with disabilities compared to the Central and South Unincorporated County areas.

Table 4-9
Household Income of Unincorporated Subareas

Household Income	Central OC	North OC	South OC	Unincorporated Areas
<$10,000	4.0%	3.6%	3.5%	3.7%
$10,000 - $14,999	1.9%	2.6%	1.3%	1.9%
$15,000 - $24,999	3.5%	3.6%	2.8%	3.3%
$25,000 - $34,999	4.0%	3.9%	3.2%	3.6%
$35,000 - $49,999	6.5%	7.2%	4.1%	5.7%
$50,000 - $74,999	11.2%	11.9%	8.5%	10.3%
$75,000 - $99,999	11.1%	12.6%	8.5%	10.5%
$100,000 - $149,999	20.0%	17.7%	17.4%	18.3%
$150,000 - $199,999	12.3%	14.9%	13.5%	13.5%
$200,000+	25.4%	22.0%	37.1%	29.3%
Median income	--	--	--	$134,282
Average income[1]	$162,640	$145,589	$207,678	$173,274
Total households	**74,734**	**76,535**	**108,095**	**259,364**

Source: American Community Survey, 5-Year Estimates, 2022.
Note (1): The average income was calculated based on averages of all tracts in each subarea that contain Unincorporated County areas.

Overpayment

According to State housing policy, overpaying occurs when housing costs exceed 30% of gross household income. **Table 4-10** displays recent estimates of households in Unincorporated CDPs that are overpaying for housing. According to SCAG, and as shown in **Table 4-11**, over 50% of all renter households in the Unincorporated County areas were overpaying for housing. **Table 4-12** displays mortgage-holding households (owners) in the Unincorporated County areas overpaying for housing. Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For

lower-income renters, severe cost burden can require families to double up resulting in overcrowding and related problems.

Table 4-10
Household Cost Burden – Unincorporated CDPs and Orange County

Income	Orange County		Unincorporated CDPs	
	Household Cost Burden		Household Cost Burden	
	>30%	>50%	>30%	>50%
Household Income less-than or = 30% MFI	135,715	114,560	1,960	1,685
Household Income >30% to less-than or = 50% MFI	101,280	48,175	1,590	1,125
Household Income >50% to less-than or = 80% MFI	97,005	22,425	2,350	1,030
Household Income >80% to less-than or = 100% MFI	33,515	4,100	1,160	210
Household Income >100% MFI	40,440	3,670	2,600	400
Total Households	**407,955**	**192,930**	**9,660**	**4,454**

Source: HUD CHAS, 2019
Note: MFI refers to the HUD Area Median Family Income – this is the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. MFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments that are made.
Note: MFI in Orange County in 2019 was $97,900 as determined by HUD
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Table 4-11
Renter Overpayment by Income Category
Unincorporated Orange County

% of Income Paid for Housing	Renters	
	Households	%
All households	9,354	100.0%
Less than 10%	265	2.83%
10-14.9%	776	8.30%
15-19.9%	686	7.33%
20-24.9%	1,035	11.06%
25-29.9%	1,023	10.94%
30-34.9%	1,029	11.0%
35-35.9%	695	7.43%
40-49.9%	853	9.12%
50% or more	2,328	24.89%
Not computed	664	7.10%
Households overpaying	4,905	52.40%
Source: SCAG Pre-Certified Local Housing Data – August 2020		

Table 4-12
Homeowner Overpayment by Income –
Unincorporated Orange County

% of Income Paid for Housing	Number of Households by Annual Income				
	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 or more
Over 30%	499	635	714	1,834	5,485
20-29%	0	21	64	209	6,904
Under 20%	0	0	15	194	8,192
Source: SCAG Pre-Certified Local Housing Data – August 2020					

As the above tables demonstrate, 1,960 households in Unincorporated Orange County areas making less than 30% of the AMI are having to pay more than 30% of their income to household costs. According to SCAG Pre-Certified Local Housing Data, there are a total of 41,617 households in Unincorporated Orange County. Thus, 4.7% of all households in Unincorporated Orange County areas have to pay more than 30% of their income to household costs. This means that extremely and very low-income households are disproportionately impacted by overpayment in Unincorporated County areas. In addition, 52.44% of renters in Unincorporated County areas

pay 30% or more of their income for rental costs. These numbers demonstrate that more than 50% of renters are overpaying, which again, disproportionately impacts lower-income households. According to SCAG data, 9,167 households or 22% of mortgage holding (homeowner) households in Orange County pay more 30% or more of their income for housing costs. According to SCAG data, 5,485 homeowners, or 22% of all homeowners covered in **Table 4-12**, making $75,000 or more are still paying more than 30% of their income towards housing costs. Approximately 7% of all households in Unincorporated County areas making less than $50,000 per year are paying over 30% of their incomes to housing costs.

According to the most recent *Orange County Analysis Of Impediments To Fair Housing Choice, April 2020* (Orange County AI), "[t]here are 194,569 households in [all of] Orange County experiencing housing cost burden, with monthly housing costs exceeding 30 % of monthly income. 104,196 of these households are families. However, Orange County has only 429 Project-Based Section 8 units and 33 Other Multifamily units with more than one bedroom capable of housing these families. Housing Choice Vouchers are the most utilized form of publicly supported housing for families, with 2,286 multi-bedroom units accessed. Large family households are also disproportionately affected by housing problems as compared with non-family households. Some focus groups have communicated that regulations and cost issues can make Orange County too expensive for families. The high percentage of 0-1- bedroom units in publicly supported housing and the low percentage of households with children in publicly supported housing support this observation."

Based on the data, the households experiencing monthly housing costs exceeding 30% of monthly income in Unincorporated Orange County areas make up only 1% of the households in all of Orange County facing household cost burden. This is not a significant percentage demonstrating that the Unincorporated Orange County areas do not face significant cost burden challenges compared to other jurisdictions in the County.

Table 4-13
Median Household Income in Unincorporated Areas

Unincorporated CDP or Area	Median Household Income	% of County Median Income	No. of Land Inventory Sites (Parcels)
Coto de Caza CDP	$210,990	210%	0
El Modena Area (Approx. Avg. Median)	$110,667	110%	181
Ladera Ranch CDP	$169,706	169%	0
Las Flores CDP	$147,404	147%	0
Midway City CDP	$48,323	48%	35
Modjeska CDP	$103,967	103%	0
North Tustin CDP	$157,487	157%	2
Orange-Olive Area (Approx. Avg. Median)	$129,636	129%	58
Rancho Mission Viejo CDP	$152,989	152%	14
Rossmoor CDP	$153,750	153%	6
Silverado CDP	$90,938	90%	0
Stanton Area (Approx. Avg. Median)	$70,360	70%	2
Trabuco Canyon CDP	$164,417	164%	0
West Anaheim Area (Approx. Avg. Median)	$71,866	72%	27
Williams Canyon CDP	N/A	N/A	0

Source: American Community Survey, 5-Year Estimates, 2021
Note: Data available for Unincorporated CDPs only, not entire Unincorporated County area.

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50% or more. Regarding the poverty threshold, Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation (June 2020) defines neighborhoods of extreme poverty as census tracts with 40% or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Location of residence can have a substantial effect on mental and physical health, education opportunities, and economic opportunities. Urban areas that are more residentially segregated by

race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation. However, these areas may also provide different opportunities, such as ethnic enclaves providing proximity to centers of cultural significance, or business, social networks, and communities to help immigrants preserve cultural identify and establish themselves in new places. Overall, it is important to study and identify these areas to understand patterns of segregation and poverty in the County.

In 1990, one R/ECAP was present in Orange County, along E. La Palma Ave in Yorba Linda. This R/ECAP had a low population, with 82 total residents. 47.56% of the population was Hispanic, 8.54% was Asian, and the remainder were White. By 2000, the R/ECAP present in Orange County had shifted slightly to the West, in the area between E. Orangethorpe Ave and E. Frontera St. This R/ECAP remained sparsely populated, with 302 residents, 19.21% of which were White, 0.99% were Native American, 4.64% Asian or Pacific Islander, and 75.17% Hispanic. The original R/ECAP had a larger Hispanic population than before, and a shrinking White population. Another R/ECAP appeared in the northernmost portion of the University of California, Irvine campus, likely due to the presence of students. The R/ECAP had 2,672 residents, which were 34.73% White, 1.57% Black, 0.41% Native American, 53.41% Asian or Pacific Islander, and 7.49% Hispanic.[19]

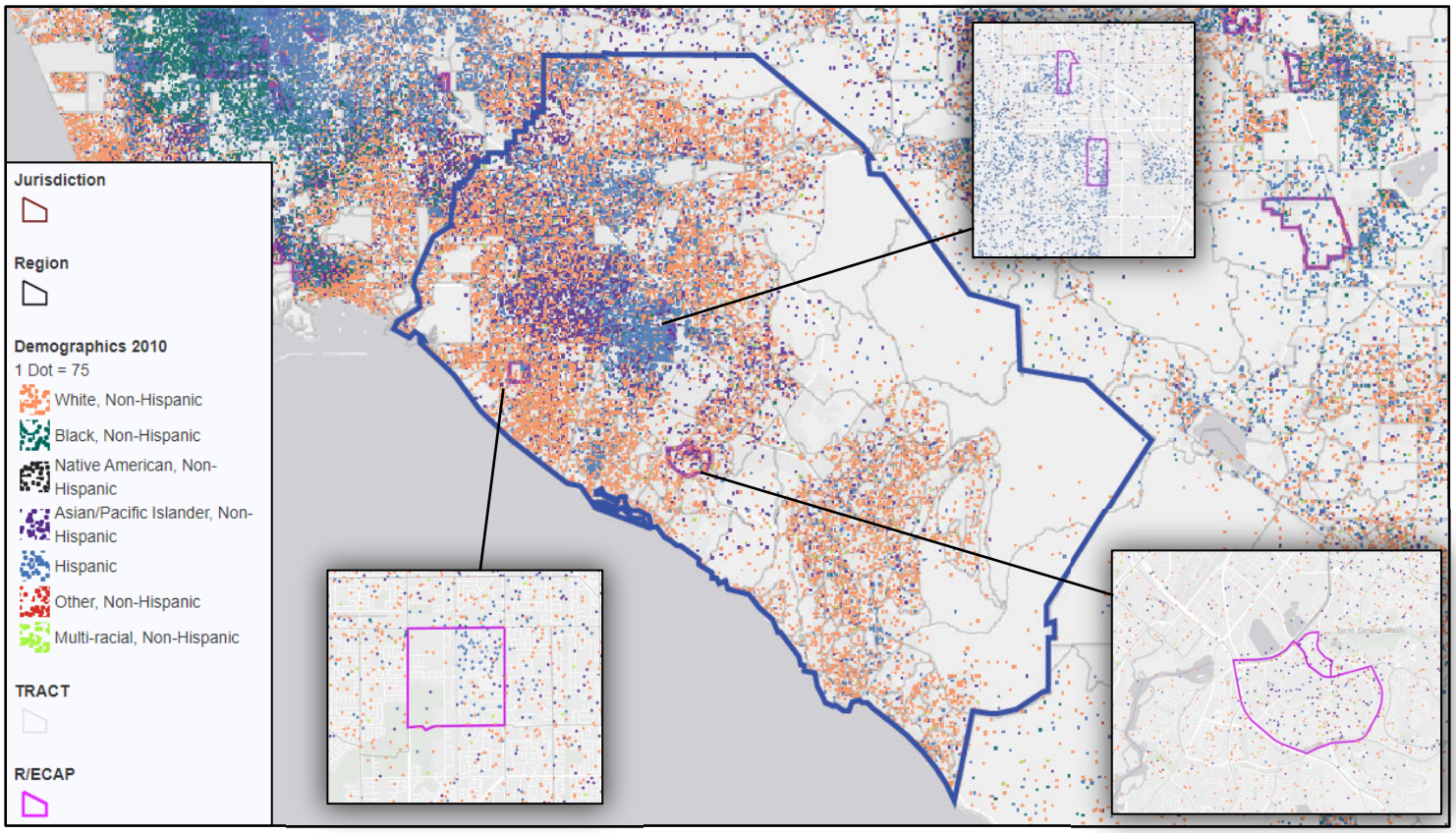
By 2010, the R/ECAP in Santa Ana was no longer present. The high level of fluctuation in this R/ECAP indicates that the area hovers around the 40% poverty threshold to qualify as a R/ECAP. The second R/ECAP, which appeared on the University of California, Irvine campus is again likely caused by the presence of diverse students, though increasing poverty is also likely a factor. All the areas with R/ECAPs in the maps above once again were present in the most current map of R/ECAPs, suggesting that these will be continued areas for concern in the future.

Figure 4-6 below displays the R/ECAP analysis of the Orange County area. The figure shows there are five pockets of racially or ethnically concentrated areas of poverty in the northern and central areas of Orange County; however, none are located within Unincorporated Orange County. There are also R/ECAPs in neighboring communities to the north and to the west. The County is committed to increasing housing mobility throughout Orange County and the region. This Housing Element outlines housing opportunities, affordable housing, and fair housing strategies to increase opportunities to all households.

In comparison to Orange County's 5 R/ECAP areas, San Diego County has 18 R/ECAP areas with the majority located in the south-west region. Additionally, Los Angeles County has 134 R/ECAP areas with the majority located in the south-west portion of the County.

[19] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

Figure 4-6
R/ECAP Areas in Orange County



Source: HUD Affirmitaevly Furthering Fair Housing Data and Mapping Tool, Data Versions: AFFHT0006, July 10, 2014

While the following may be contributing Factors to R/ECAPs, there are no such areas in the Unincorporated areas of Orange County, thus, addressing these areas is not a priority for the County:

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Location and type of affordable housing

- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination

  Source of income discrimination[20]

Disparities in Access to Opportunity

Regional Opportunity Index (ROI)

The UC Davis Center for Regional Change and Rabobank partnered to develop the Regional Opportunity Index (ROI) intended to help communities understand local social and economic opportunities. The goal of the ROI is to help target resources and policies toward people and places with the greatest need to foster thriving communities. The ROI incorporates both "people" and "place" components, integrating economic, infrastructure, environmental, and social indicators into a comprehensive assessment of the factors driving opportunity.

The ROI: People (**Figure 4-7**) is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

- **Educational Opportunity**: Assesses people's relative success in gaining educational assets, in the form of a higher education, elementary school achievement, and regular elementary school attendance.
- **Economic Opportunity**: Measures the relative economic well-being of the people in a community, in the form of employment and income level.
- **Housing Opportunity**: Measures the relative residential stability of a community, in the form of homeownership and housing costs.
- **Mobility/Transportation Opportunity**: Contains indicators that assess a community's relative opportunities for overcoming rural isolation.
- **Health/Environmental Opportunity**: Measures the relative health outcomes of the people within a community, in the form of infant and teen health and general health.
- **Civic Life Opportunity**: A relative social and political engagement of an area, in the form of households that speak English and voter turnout.

The ROI: Place (**Figure 4-8**) is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

[20] Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

- **Education Opportunity**: Assesses a census tract's relative ability to provide educational opportunity, in the form of high-quality schools that meet the basic educational and social needs of the population.
- **Economic Opportunity**: Measures the relative economic climate of a community, in the form of access to employment and business climate.
- **Housing Opportunity**: Measures relative availability of housing in a community, in the form of housing sufficiency and housing affordability.
- **Health/Environment Opportunity**: A relative measure of how well communities meet the health needs of their constituents, in the form of access to health care and other health-related environments.
- **Civic Life Opportunity**: Measures the relative social and political stability of an area, in the form of neighborhood stability (living in same residence for one year) and U.S. citizenship.

As the figures show, the majority of Orange County is classified as high opportunity zones with pockets of low opportunity in the north central area. This indicates generally high levels of relative opportunities that people can achieve as well as high levels of relative opportunities that the County provides. **Table 4-14** below identifies the County's overall opportunity indicators compared to the State. The data shows the following key findings:

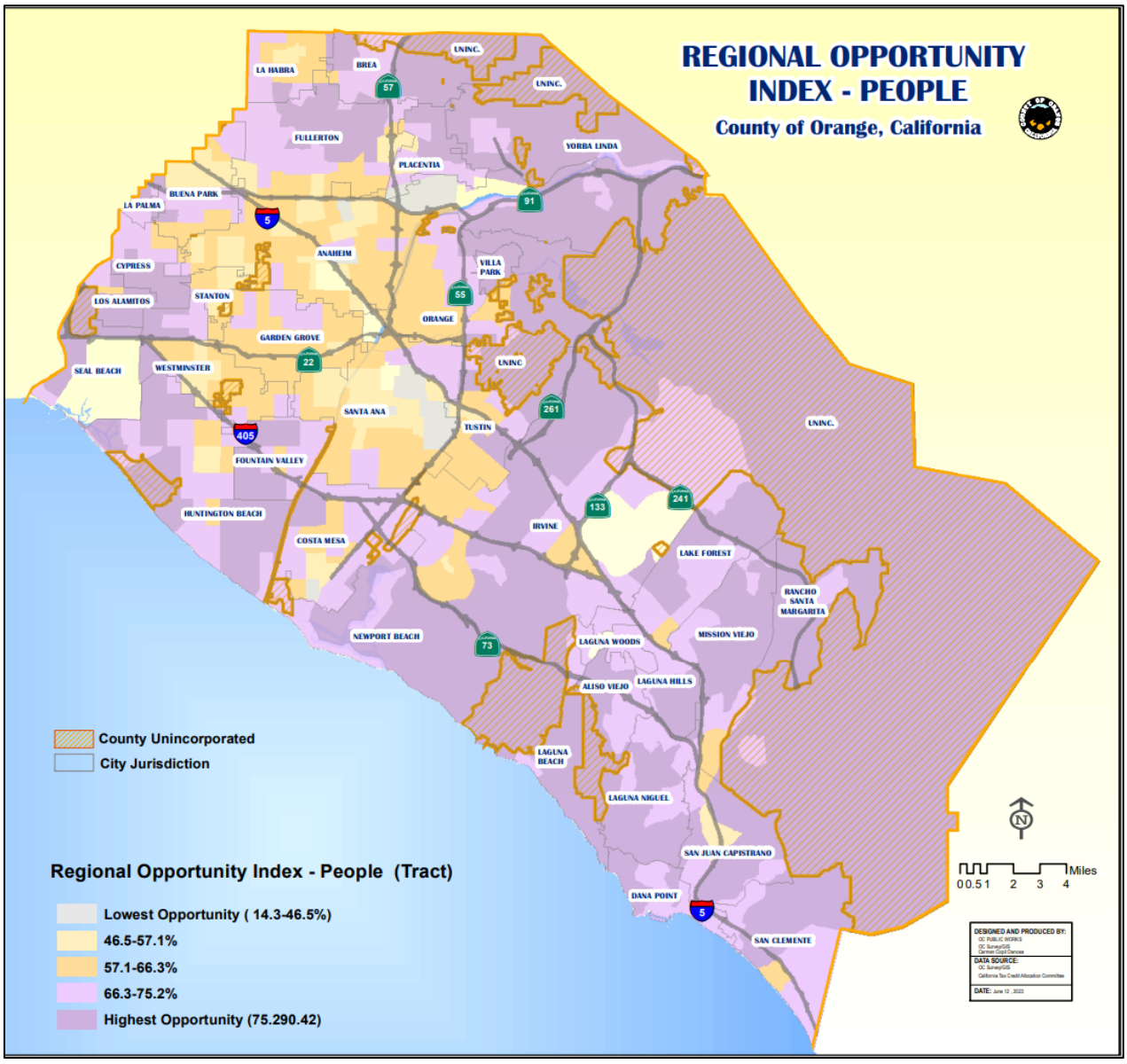
- The County has higher rates of college educated adults, high school graduates, and University of California (UC)/California State University (CSU) eligible students.
- Orange County residents experience higher employment rates and minimum basic income rates than the State. The County has a higher job availability rate and higher job quality.
- Orange County has a higher homeownership rate, but the cost housing affordability rate is lower than the State.
- Commute times are higher in Orange County, but County residents have higher access to vehicles.
- Overall health and environmental opportunities are comparable to the State. However, Orange County has higher access to prenatal care and health care availability.
- Orange County has comparable voting rates as the State, but Orange County residents have lower English-speaking rates and lower citizenship rates.

Table 4-14
Local and State Regional Opportunity Indicators (ROI) for Place and People

ROI Indicator		Orange County	California
Education	**People**		
	College Educated Adults	44%	38%
	Math Proficiency	77%	70%
	English Proficiency	72%	65%
	Elementary Truancy	16%	24%
	Place		
	High School Graduation Rate	92%	83%
	UC/CSU Eligibility	48%	41%
	Teacher Experience	54%	36%
	High School Discipline Rate	4%	6%
Economic	**People**		
	Employment Rate	92%	89%
	Minimum Basic Income	70%	64%
	Place		
	Job Availability	859.93	701.75
	Job Quality	42%	40%
	Job Growth	2%	3%
	Bank Accessibility	0.27	0.24
Housing	**People**		
	Home Ownership	58%	55%
	Housing Cost Burden	52%	52%
	Place		
	Housing Advocacy	89%	91%
	Housing Affordability	0.16	0.19
Mobility	**People**		
	Vehicle Availability	90%	86%
	Commute Time	61%	60%
	Internet Access	4.70	4
Health and Environment	**People**		
	Infant Health	95%	95%
	Birth to Teens	5%	7%
	Years of Life Lost	23.37	29.84
	Place		
	Air Quality	10.44	10.01
	Prenatal Care	90%	83%
	Access to Supermarket	53%	53%
	Health Care Availability	2.28	1.76
Civic Life	**People**		
	Voting Rates	31%	31%
	English Speakers	87%	88%
	Place		
	US Citizenship	81%	83%
	Neighborhood Stability	85%	85%

Source: UC Davis Center for Regional Change and Rabobank, 2014.

Figure 4-7
Regional Opportunity Index: People, 2014



Source: UC Davis Center for Regional Change and Rabobank, 2014

Figure 4-8
Regional Opportunity Index: Place, 2014

Source: UC Davis Center for Regional Change and Rabobank, 2014

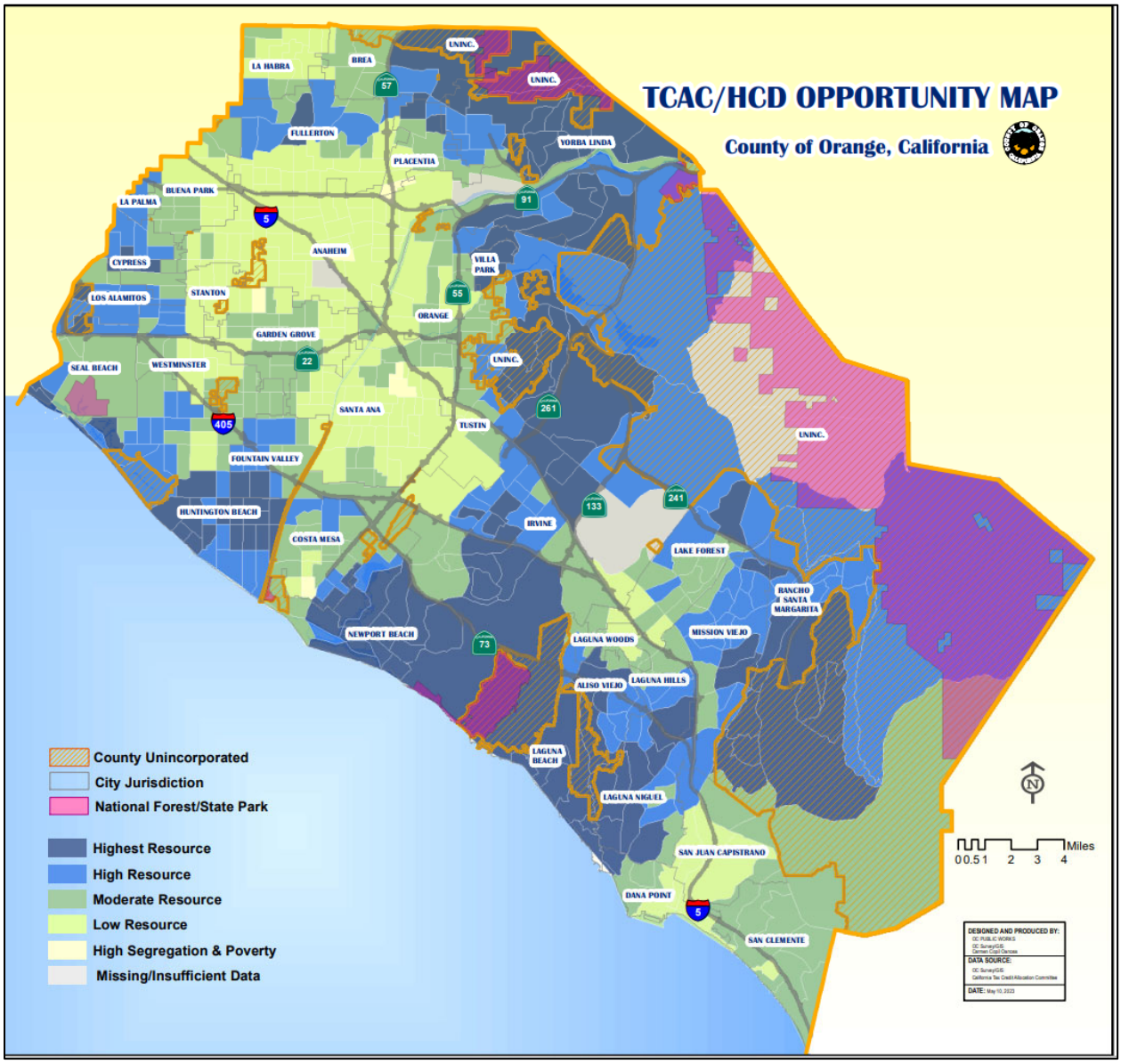
Opportunity Area Maps

HCD together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force (Task Force) to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD). The Task Force developed the TCAC/HCD opportunity Area Maps to understand how public and private resources are spatially distributed. The Task Force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

According to the Task Force's methodology, the tool allocates 20% of the tracts in each region with the highest relative index scores to the "Highest Resource" designation and the next 20% to the "High Resource" designation. Each region then ends up with 40% of its total tracts as "Highest" or "High" resource. These two categories are intended to help State decision-makers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice.

As shown in **Figure 4-9** below, Orange County has large pockets of low resource and high segregation and poverty areas surrounded by moderate to high resource communities. The Cities of Anaheim, Santa Ana, Westminster, Lake Forest, and San Juan Capistrano have concentrations of low resources areas. The high segregation and poverty areas are mostly found in the north-central region of the County. The County is committed to exploring programs and methods of increasing housing access and opportunity to both existing residents, future residents, and households in nearby areas.

Figure 4-9
TCAC/HCD Opportunity Map



Source: California Tax Credit Allocation Committee and Department of Housing and Community Development, 2021.

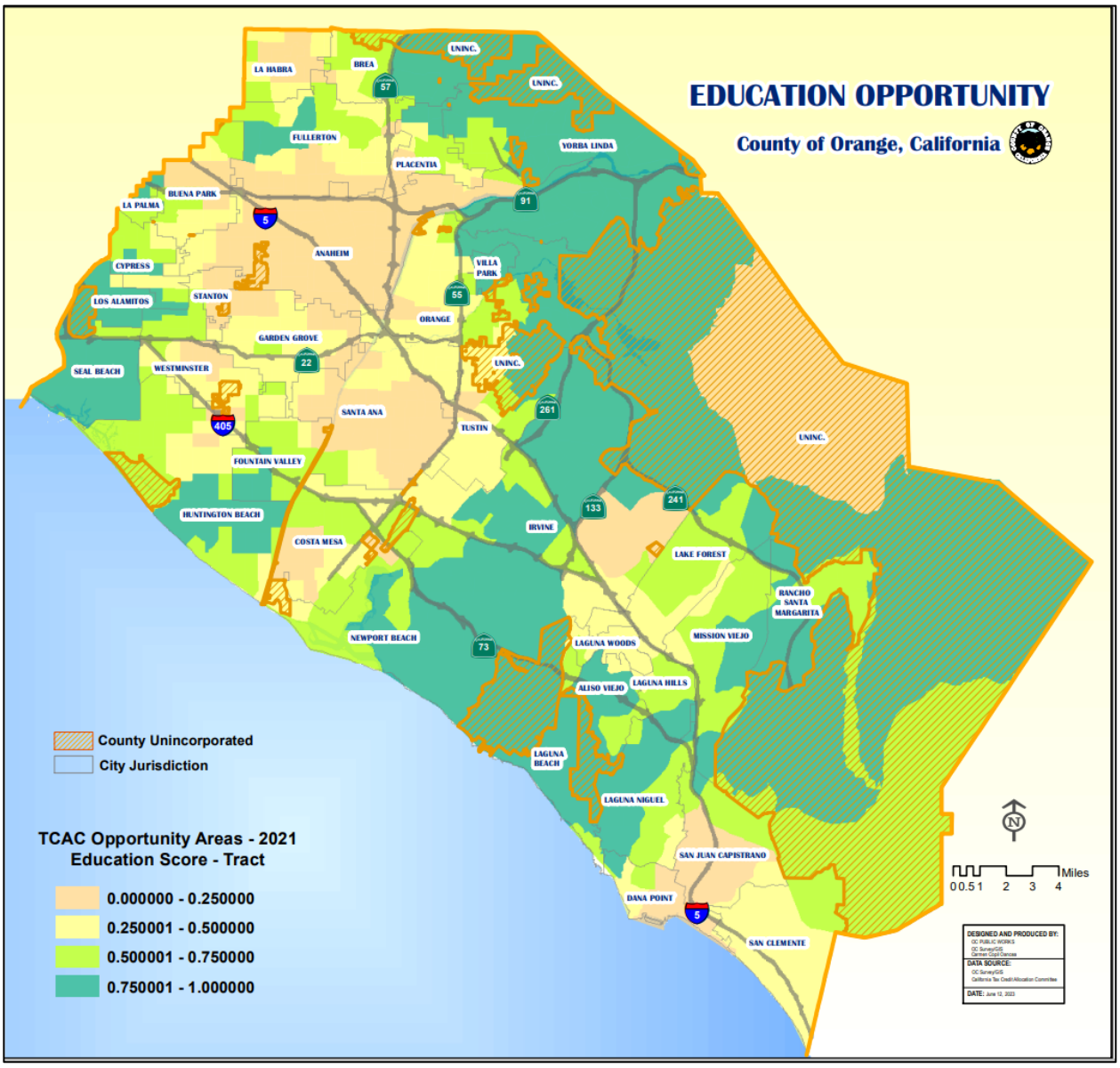
Education Opportunity

The TCAC/HCD Opportunity Area Maps include education data, as illustrated in **Figure 4-9**. This data represents opportunity levels based on the following four factors:

- **Math proficiency** – Percentage of 4th graders who meet or exceed math proficiency standards.
- **Reading proficiency** – Percentage of 4th graders who meet or exceed literacy standards.
- **High school graduation rates** – Percentage of high school cohort that graduated on time.
- **Student poverty rate** – Percentage of students not receiving free or reduced-price lunch.

As **Figure 4-10** shows, Orange County is categorized as having high positive education outcomes in the coastal, southern, and southeastern regions and less positive education outcomes in the more central regions of Orange County. The TCAC methodology for the 2021 analysis sites household income as a key component to positive educational outcomes. In the context of the maps, there is a positive correlation between census tracts with higher incomes and those with high positive education outcomes. The County has included programs in the Housing Action Plan intended to provide additional opportunities for existing and future residents throughout Unincorporated Orange County.

Figure 4-10
Education Opportunity Map



Source: HCD AFFH Data Viewer, TCAC Opportunity Areas, 2021

Economic Opportunity

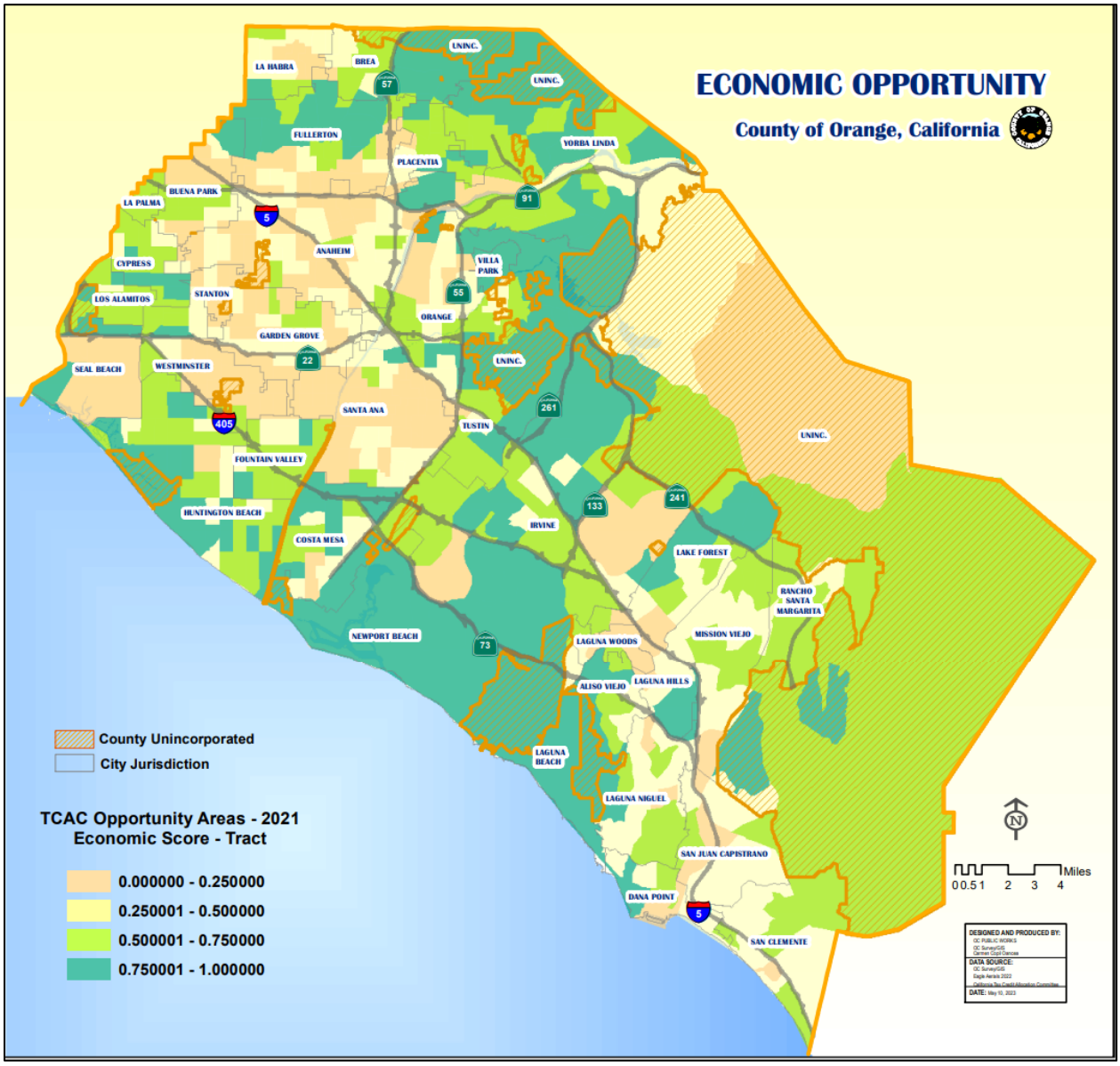
The TCAC/HCD Opportunity Area Maps include economic data, as illustrated in **Figure 4-11**. This data represents opportunity levels based on the following five factors:

- **Poverty** – Percent of population with income above 200% of federal poverty line.
- **Adult Education** – Percent of adults with a bachelor's degree or above.
- **Employment** – Percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces.
- **Job Proximity** – Number of jobs filled by workers with less than a Bachelor of Arts (BA) that fall within a given radius (determined by the typical commute distance of low-wage workers in each region) of each census tract population-weighted centroid.
- **Median Home Value** — Value of owner-occupied units.

As shown in **Figure 4-11** the County has a mix of positive and less positive economic outcomes throughout the region. Positive economic outcomes are generally related to access to education and level of education achieved and proximity to job centers or employment. Key indicators for less positive outcomes are generally related to poverty and home value. Similar to the education analysis above, income and positive employment are closely related. The areas with high positive economic outcomes are the southern, coastal, and eastern regions of the County; these areas include high income cities and communities such as Huntington Beach, Newport Beach, Laguna Beach, Mission Viejo, and Anaheim Hills.

As part of the County's candidate sites analysis, sites have been identified equally throughout the Unincorporated County areas; there are no concentrations of lower-income units identified. As such, the future development of affordable housing may occur in regions of the County providing various levels of opportunity for economic achievement.

Figure 4-11
Economic Opportunity Map



Source: HCD AFFH Data Viewer, TCAC Opportunity Areas, 2021.

Access to Transit

AllTransit, which is an online database that tracks connectivity, access, and frequency in the United States, explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided in **Table 4-15**, Orange County as a whole scored a 4.2 AllTransit performance score, illustrating moderate access to public transit to commute to work. One Unincorporated CDP, the Midway City CDP, has an AllTransit performance score of 5.9, which more closely matches the score of San Diego County as a whole. By contrast, the Coto de Caza, Ladera Ranch, and Las Flores CDPs, which are all located to the east of the center of the County and border wilderness areas, are lacking access to transportation, which may pose a challenge for future development in those areas. Those three CDPs, however, are mostly built out in accordance with Development Agreements and thus, additional development in those areas is unlikely and would be challenging to develop further due to fire hazards and other issues. Access to transportation increases both economic and environmental/health opportunities. As **Figure 4-12** shows, the north-western portion of the county is well connected. The eastern region is made up of mountainous area which decreases accessibility; however, there is a lack of connectivity in the southern region of Orange County.

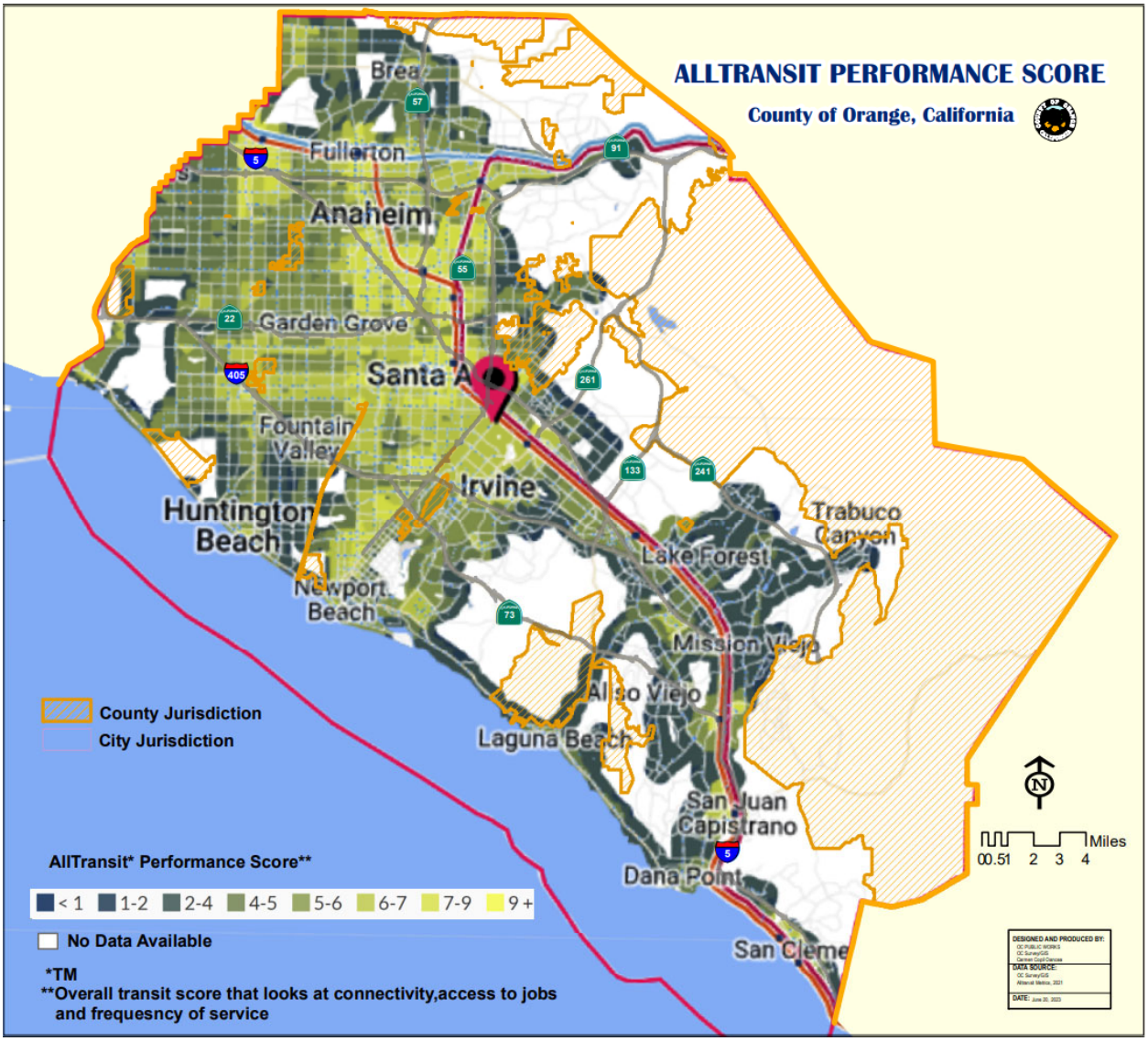
In comparison to Orange and San Diego Counties, Los Angeles County has the highest AllTransit Performance Score (6.8), depicting moderate access to public transit to commute to work. San Diego County and Orange County have similar transit scores, with San Diego County reporting a higher overall score.

Table 4-15
Orange County Transit Indicators, 2019

Jurisdiction	AllTransit Performance Score	Transit Trips Per Week within ½ Mile	Jobs Accessible in 30-Min Trip	Commuters Who Use Transit	Transit Routes Within ½ Mile
Orange County	4.2	528	172,595	2.28%	4
Coto de Caza CDP	0.1	16	1,845	0.41%	0
Midway City CDP	5.9	1,043	226,650	1.38%	8
Ladera Ranch CDP	0.2	3	534	0.16%	1
Las Flores CDP	0.3	22	6,814	0.00%	0
North Tustin CDP	2.8	262	109,250	0.35%	2
Rossmoor CDP	3.1	212	91,634	1.52%	3
Los Angeles County	6.8	2,608	321,664	6.66%	8
San Diego County	5.3	1,358	82,735	3.28%	4

Source: Center for Neighborhood Technology 2019, AllTransit.

Figure 4-12
AllTransit Performance Score – Orange County



Source: AllTransit Metrics, 2021.

Environmental Justice

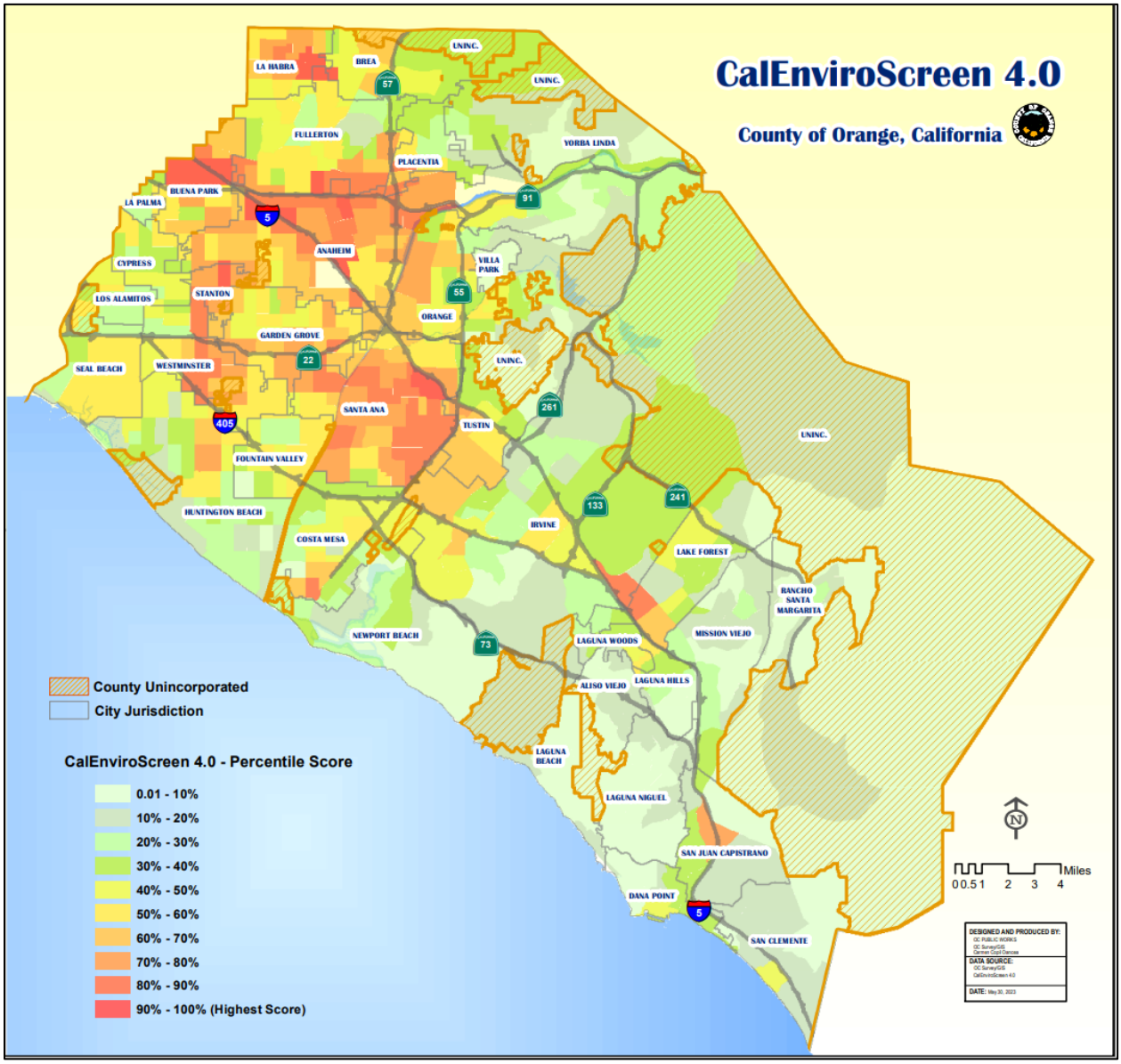
The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Research has shown a heightened vulnerability of people of color and lower socioeconomic status to environmental pollutants.

The CalEnviroScreen Model is made up of a suite of 20 statewide indicators of pollution burden and population characteristics associated with increased vulnerability to pollution's health effects. The model identifies areas of health risk by conducting the following:

> Uses a weighted scoring system to derive average pollution burden and population characteristics scores for each census tract.
>
> Comparing these scores for a given census tract to the other tracts in the state by multiplying the pollution burden and population characteristics components together.
>
> The final CalEnviroScreen score measures the relative pollution burdens and vulnerabilities in one census tract compared to others and is not a measure of health risk.

Figure 4-13 shows the central and northern region of the County are generally high scoring. The majority of the southern area of the county is low scoring and has low pollution burdens. Overall, high scores signify high pollution burdens and high exposure to harmful pollutants, specifically for residents in low-income census tracts. Low-income residents, or areas with higher percentages of low-income households are often disproportionately affected by poor environmental quality. Providing housing options near essential resources and economic opportunity/jobs can decrease overall vehicle miles traveled (VMT), which in many cases is related to air quality. Additionally, the County may work with developers to implement and increase the use of environmentally friendly materials and strategies.

Figure 4-13
CalEnviroScreen 4.0, Orange County



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022).

Figure 4-14 shows Census Tracts 6059087902 and 6059087805, which both include Unincorporated County areas that scored over the 70th percentile in CalEnviroScreen 4.0. The census tracts have a pollution burden of 87 and 90, respectively. For the Exposure Indicators and the Environmental Effects, these census tracts scored the following:

Census Tract 6059087902:

Exposures

- Ozone: 68
- Particulate Matter 2.5: 45
- Diesel Particulate Matter: 9
- Toxic Releases: 37
- Traffic 40
- Pesticides: 0
- Drinking Water: 16
- Lead from Housing: 7

Environmental Effects

- Cleanup Sites: 0
- Groundwater Threats: 0
- Hazardous Waste: 17
- Impaired Waters: 0
- Solid Waste: 0

Census Tract 6059087805:

Exposures

- Ozone: 43
- Particulate Matter 2.5: 74
- Diesel Particulate Matter: 35
- Toxic Releases: 90
- Traffic 46
- Pesticides: 48
- Drinking Water: 66
- Lead from Housing: 84

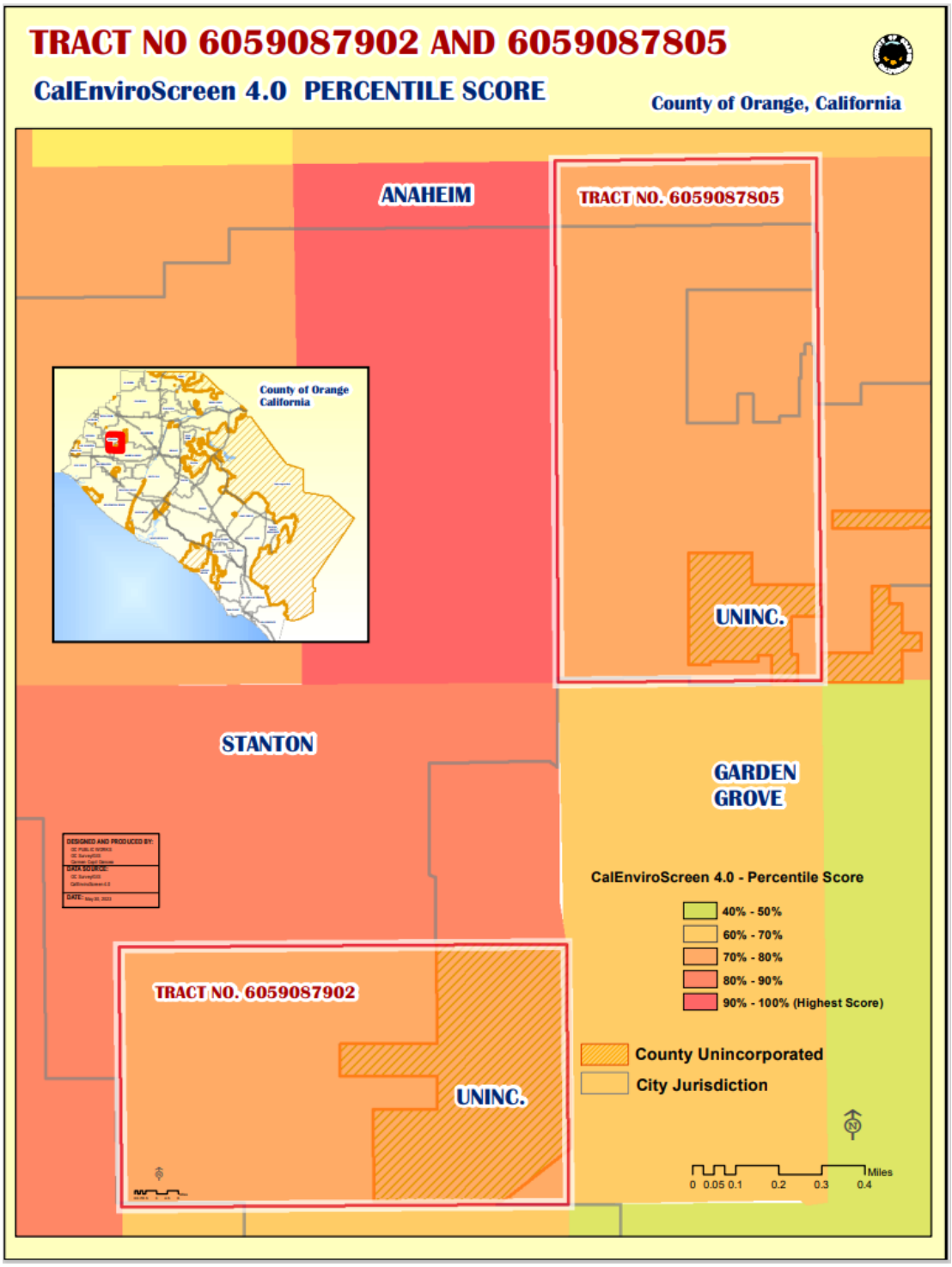
Environmental Effects

- Cleanup Sites: 84
- Groundwater Threats: 65
- Hazardous Waste: 95
- Impaired Waters: 0
- Solid Waste: 36

The census tract 6059087902 is located just south of the City of Stanton and is made up of single- and multifamily uses, and a variety of commercial uses along Beach Boulevard. The census tract is made up of 49.9% Hispanic population, 38.6% Asian American population, and 7.1% White population. Approximately 16.1% of the population includes children ages 10 years and younger, as well as 14.8% seniors 65 years and older.

The census tract 6059087805 is located just east of the City of Stanton and is made up of primarily single-family uses with two commercial parcels along Katella Avenue. The census tract is made up of 49.9% Hispanic population, 38.6% Asian American population, and 7.1% White population. Approximately 16.1% of the population includes children ages 10 years and younger, as well as 14.8% seniors 65 years and older.

Figure 4-14
CalEnviroScreen 4.0, Unincorporated Parcels 6059087902 and 6059087805



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022)

Figure 4-15 shows Census Tract 6059032059 which is one of the lowest scoring Unincorporated census tracts with a CalEnviroScreen 4.0 percentile of two. The census tract has a pollution burden percentile of three. For the Exposure Indicators and the Environmental Effects, the census tract scored the following:

Census Tract 6059032059:

Exposures

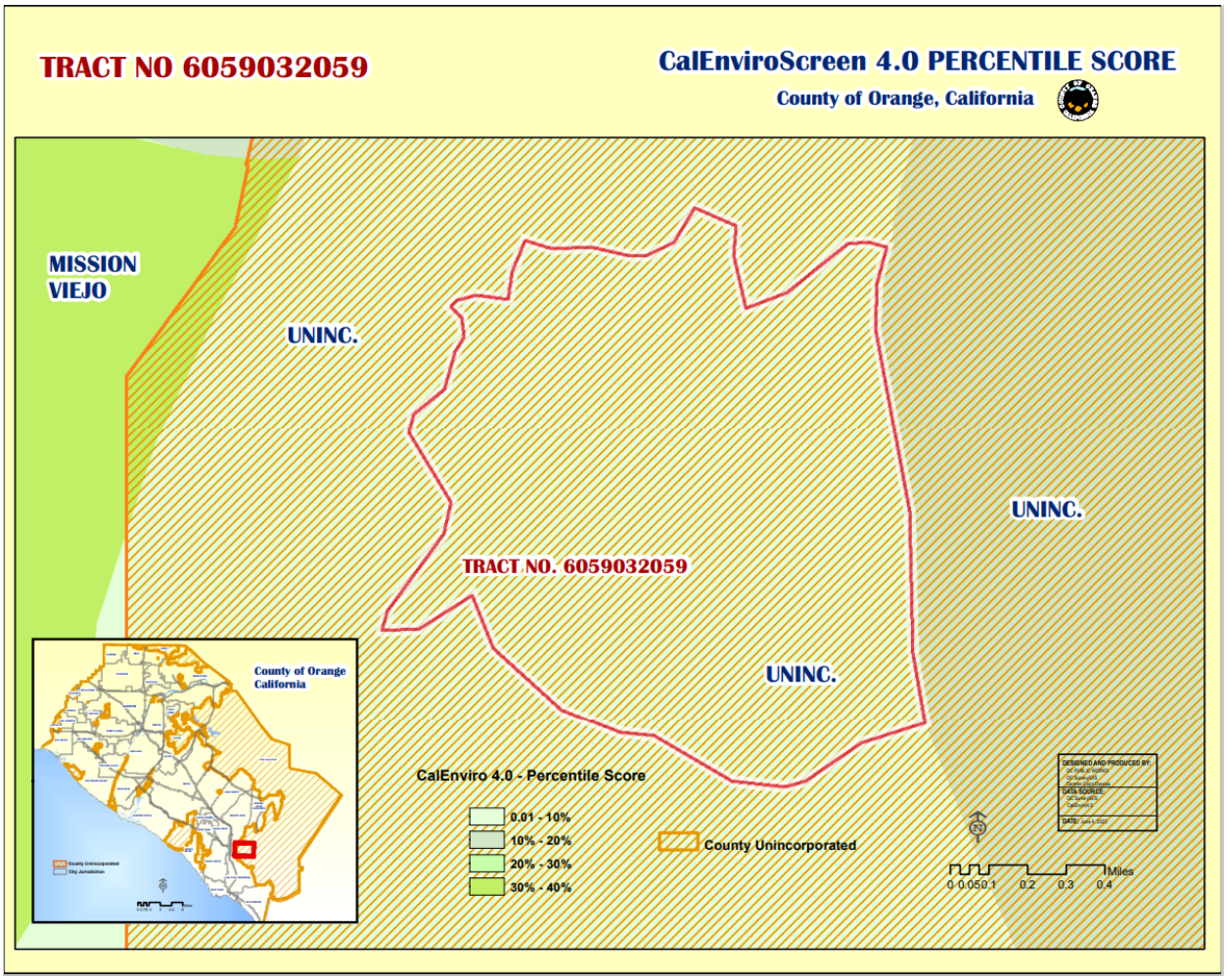
- Ozone: 68
- Particulate Matter 2.5: 45
- Diesel Particulate Matter: 9
- Toxic Releases: 37
- Traffic: 40
- Pesticides: 0
- Drinking Water: 16
- Lead from Housing: 7

Environmental Effects

- Cleanup Sites: 0
- Groundwater Threats: 0
- Hazardous Waste: 17
- Impaired Waters: 0
- Solid Waste: 0

The census tract is located in Ladera Ranch and includes a majority single-family residential uses, some multifamily uses, a middle school, and some commercial uses. The census tract is made up of 63.7% White population, 16.6% Asian American population, and 15.6% Hispanic population. Approximately 22.4% of the population includes children ages 10 years and younger, as well as 5.7% seniors ages 65 years and older.

Figure 4-15
CalEnviroScreen 4.0, Unincorporated Parcel 6059032059



Source: CalEnviroScreen 4.0 Map Tool (Accessed March 2022).

Conclusion and Trends in Disparities in Access to Opportunities

Generally, access to opportunity is highest for non-Hispanic Whites and Asians/Pacific Islanders in Orange County. By contrast, access to opportunity is generally lower for Black residents than for non-Hispanic Whites and Asians and access is lowest for Hispanics. Metrics are lower on average in census tracts with more of each of these groups. Geographically, access to economic, environmental, and educational opportunity is generally lowest in portions of North Orange County. Anaheim, Garden Grove, Santa Ana, and Westminster all have relatively low scores across various dimensions of opportunity. Access to opportunity is also low in San Juan Capistrano. However, access to transportation is generally better in North Orange County than in South Orange County. There are Unincorporated County areas in all of these locations, but none of these Unincorporated County areas provides low opportunities generally.

Disproportionate Housing Needs and Displacement

The analysis of disproportionate housing needs and displacement within Orange County evaluates existing housing needs, need of the future housing population, and units within the community at-risk of converting to market-rate.

A variety of factors affect housing needs for different households. In particular, income, other household characteristics, and disability are taken into consideration when proposing the type and size of housing units needed by different households, as well as accessibility of housing based on existing units in a jurisdiction. **Tables 4-16** and **4-21** show data for demographic characteristics of Orange County as a whole and Unincorporated County areas and CDPs if data was available, as compared to the State of California. Additional detailed analysis of the community's demographics is outlined in the Community Profile, Section 2, of this Housing Element.

The U.S. Department of Housing and Urban Development (HUD) designates four specific types of housing problems, which, if a household experiences at least one of, the households are considered to be facing housing problems. Those are: (1) housing unit lacks complete kitchen facilities; (2) housing unit lacks complete plumbing facilities; (3) household is overcrowded; and (4) household is cost-burdened. The Orange County AI found that approximately 45% of all households in Orange County experience some kind of housing problem, with Hispanic households experiencing the highest rate of housing problems. Among housing types, non-family households and households larger than five persons experience the highest rates of housing problems in Orange County.

Housing problems are considered "severe" by HUD if there is a complete lack of kitchen or plumbing, more than one person per room, or a cost burden greater than 50%. The Orange County AI examined households within Orange County experiencing severe housing problems

and found that Hispanic households similarly experience the highest rates of severe housing problems within Orange County. This data indicates that large households (greater than 5 people), non-family households, and Hispanic households disproportionately experience the highest levels of housing problems within Orange County in terms of percentages of total households of those types.

In terms of total numbers, the highest amount of housing problems is experienced by White/Non-Hispanic and Hispanic households, with those same populations experiencing the highest total numbers of severe housing problems. Housing problems are experienced by households of all sizes in Orange County (both family and non-family households), with a large percentage of households of every race/ethnicity experience housing problems, of which Hispanic households experience the highest rates of both housing problems and severe housing problems. As data elsewhere in this section discusses, cost-burden and overcrowding are two of the largest problems facing households in Orange County.

Table 4-16: Housing Problems, Orange County

Demographics of Households with Disproportionate Housing Needs			
Households Experiencing Any of 4 Housing Problems	Orange County		
	# with Problems	# Households	% with Problems
By Race/Ethnicity			
White, Non-Hispanic	206,658	540,773	38.22%
Black, Non-Hispanic	8,074	16,719	48.29%
Hispanic	152,740	241,841	63.16%
Asian or Pacific Islander, Non-Hispanic	84,193	186,038	45.26%
Native American, Non-Hispanic	1,063	2,179	48.78%
Total	**452,728**	**987,550**	**45.84%**
By Household Type and Size			
Family households, <5 people	228,740	576,690	39.66%
Family households, 5+ people	95,050	145,028	65.54%
Non-family households	138,270	273,662	50.53%
By Race/Ethnicity			
White, Non-Hispanic	104,324	540,773	19.29%
Black, Non-Hispanic	4,816	16,719	28.81%
Hispanic	107,752	241,841	44.55%
Asian or Pacific Islander, Non-Hispanic	50,205	186,038	26.99%
Native American, Non-Hispanic	544	2,179	24.97%
Total	**267,641**	**987,550**	**27.10%**

Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020

As shown by the **Table 4-16**, in the County, 45.84% of residents overall face 1 of 4 housing problems. White and Asian or Pacific Islander residents have slightly lower rates of housing problems, at 38.22% and 45.26% respectively, while Black residents have a slightly higher rate of 48.29%. Hispanic residents have the highest rates at 63.16% countywide. Native American residents have a rate similar to the average at 48.74%, but the low populations of Native American residents across jurisdictions may lead to misleading data (which is why they are not as frequently discussed here). Housing problems are found in differing rates across family types, with 39.66% for families of 5 or less, 65.59% for families of 5 or more, and 50.53% for non-family households.

Cost Burden and Overpayment

Cost burden and overpayment must be viewed considering income data. **Table 4-17** shows that Orange County and the Unincorporated County areas have a higher household median income than the state overall. In the Unincorporated areas approximately 58% of households earn over $100,000 in annual income. This is a greater percentage than in Orange County as a whole and the State. Just under 50% of households in Orange County earn an annual income over $100,000, while 37.7% of households in California earn that same amount. Generally, a higher percentage of married couple households typically result in a higher median income in a community as these households may have more than one income source. Higher income provides means for safe and sufficient housing, as well as the ability to update and renovate older attributes of the home.

As previously stated, the State uses five income categories for the purpose of determining housing affordability and need in communities based on area median income (AMI), which refers to the midpoint of the income distribution for a specific geographic area, as defined by the U.S. Department of Housing and Urban Development (HUD) using data from the U.S. Census Bureau.

HUD annually develops median household income estimates based on census data for the purpose of determining program eligibility. All jurisdictions in Orange County, including the County, use HUD's annual median household estimate to determine eligibility for its affordable housing programs. The median household income that HUD developed to determine eligibility in in Orange County as a whole for the past several years was as follows:

- 2019 $97,900
- 2020 $103,000
- 2021 $106,700
- 2022 $119,100
- 2023 $127,800

The County's AMI has trended upward each year and for 2023 is $127,800. Using the most recent HUD-determined AMI, the five income eligibility categories are calculated as follows:

- **Extremely Low-income** - 30% or less of AMI (30% or less of the $127,800 AMI for Unincorporated County areas is $38,340 or less)
- **Very Low-income** - 50% or less of AMI (50% or less of the $127,800 AMI for Unincorporated County areas is less than $63,900)
- **Low-income** - 51% to 80% of AMI (51% or less of the $127,800 AMI for Unincorporated County areas is between $65,178 and $102,240)
- **Moderate-Income** - 81% to 120% of AMI (81% to 120% of the $127,800 AMI for Unincorporated County areas is between $103,518 and $153,360)
- **Above Moderate-Income** - more than 120% of AMI (121% of the $127,800 AMI for the Unincorporated County areas is greater than or equal to $154,638)

As shown by **Table 4-17** in Orange County as a whole, using the HUD-developed AMI, approximately 54% of households, compared to approximately 41% of households in the Unincorporated County areas, and 62% of households in the State, are considered extremely, very, or low-income. Thus, approximately 46% of households in Orange County as a whole are considered moderate-income or above.

Table 4-17
Households by Income

Household Income	Unincorporated Areas	Orange County	California
Less than $10,000	4.8%	4.2%	4.8%
$10,000-$14,999		2.7%	4.1%
$15,000-$24,999	5.2%	5.6%	7.5%
$25,000-$34,999	4.0%	6%	7.5%
$35,000-$49,999	5.0%	8.8%	10.5%
$50,000-$74,999	12.0%	14.6%	15.5%
$75,000-$99,999	10.2%	12.8%	12.4%
$100,000-$149,999	18.2%	18.6%	16.6%
$150,000-$199,999	--	11.1%	8.9%
$150,000-$250,000	21.7%	--	--
$200,000 or More	--	15.5%	12.2%
$250,000 or More	18.9%	**--**	**--**
Area Median Income*	**$82,214**	**$90,234**	**$75,235**

Source: American Community Survey, 5-Year Estimates, 2019.
**HUD-developed Area Median Income (AMI)*

As seen in **Table 4-18**, approximately 9% of those in owner occupied units and 41% of those in rental units earning 80% or less of the Unincorporated County areas AMI of $82,214, are facing cost burden or severe cost burden, which means those households are paying 30% or more of their income for housing, In comparison, as shown in **Table 4-19**, in Orange County as a whole, 18% of owner occupied and 46% of rental units in the same income categories are facing cost burden or severe cost burden. Housing cost burden has several consequences for a household, such as displacement from their current home creating limited access to essential goods and employment by potentially increasing commute times and removing available income from other necessities such as food. The data demonstrates that housing affordability is an issue in Orange County for all income categories. Programs 2 through 7 of the County's Housing Action Plan address this issue. In addition, there are a number of funding programs that can address this issue. See Housing Action Plan Section 5.

Table 4-18
Housing Cost as a Percentage of Household Income – Unincorporated Areas

Owner-Occupied Units					
Income Range	**Total Households**	**% of Total Owner Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	539	2.3%	23	30	486
$20,000-34,999	798	3.4%	191	124	483
$35,000-49,999	921	3.9%	208	101	612
$50,000-74,999	1,884	7.9%	523	172	1,189
$75,000+	19,376	81.4%	9,643	5,517	4,216
Zero or Negative Income	298	1.3%	0	0	0
Subtotal	**29,938**	**100%**	**10,588**	**5,944**	**6.986**
Renter-Occupied Units					
Income Range	**Total Households**	**% of Total Renter Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	774	12.6%	0	125	649
$20,000-34,999	569	9.3%	0	28	541
$35,000-49,999	425	6.9%	0	8	417
$50,000-74,999	1,097	17.9%	0	162	935
75,000+	2,640	43.1%	934	1,076	630
Zero or Negative Income	427	7.0%	0	0	0
No Cash Rent	190	3.1%	0	0	0
Subtotal	**6,122**	**100%**	**934**	**1,399**	**3,172**
Total Households	**36,060**	-	-	-	-

Source: American Community Survey, 5-Year Estimates, 2019
** 30% of income spent on housing is considered a "cost burden," and 50% or more of income spent on housing is considered a "severe cost burden" for a household*
Note: Some households are not accounted for; therefore, figures may differ slightly for other U.S. Census estimates for total households.

Table 4-19
Housing Cost as a Percentage of Household Income – Orange County

Owner-Occupied Units					
Income Range	**Number of Households**	**% of Total Owner Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	29,245	4.9%	1,999	1,887	25,359
$20,000-34,999	38,248	6.4%	8,530	5,426	24,292
$35,000-49,999	39,098	6.6%	11,640	5,973	21,485
$50,000-74,999	69,515	11.7%	23,902	10,047	35,566
$75,000+	414,714	70.0%	223,646	109,422	81,646
Zero or Negative Income	4,452	0.8%	0	0	0
Subtotal	**595,272**	**100%**	**269,717**	**132,755**	**188,348**
Renter-Occupied Units					
Income Range	**Number of Households**	**% of Total Renter Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30% or More of Household Income***
$0-19,999	51,272	11.6%	468	3,308	47,496
$20,000-34,999	54,078	12.2%	1,199	1,598	51,281
$35,000-49,999	51,485	11.6%	1,024	3,003	47,458
$50,000-74,999	80,677	18.2%	2,479	19,533	58,665
75,000+	184,320	41.7%	73,847	76,826	33,647
Zero or Negative Income	10,167	2.3%	0	0	0
No Cash Rent	10,221	2.3%	0	0	0
Subtotal	**442,220**	**100%**	**79,017**	**104,268**	**238,547**
Total Households	**1,037,492**	**-**	**-**	**-**	**-**

Source: American Community Survey, 5-Year Estimates, 2019
** 30% of income spent on housing is considered a "cost burden," and 50% or more of income spent on housing is considered a "severe cost burden" for the household.*
Note: Some households are not accounted for; therefore, figures may differ slightly for other U.S. Census estimates for total households.

Table 4-20 displays data for household tenure (owner vs. renter) for Unincorporated Orange County, Orange County as a whole, and the State. Homeownership is a crucial foundation for helping families with low incomes build strength, stability, and independence. The opportunity for transition into the homebuyer's market is important for persons and households in different communities as homeownership allows for increased stability and opportunity to age in place. The data shows that just above half of Orange County and California households own their own home (57.4% and 54.8%, respectively), while just above three-quarters of households in Unincorporated Orange County own their own home. This suggests strong home ownership and stability in the Unincorporated County areas.

Table 4-20
Household Tenure

Household Tenure	Unincorporated Areas	Orange County	California
Owner Households	77.5%	57.4%	54.8%
Renter Households	22.5%	42.6%	45.2%
Total Occupied Housing Units	**41,617**	**1,037,492**	**13,044,266**

Source: American Community Survey, 5-year Estimates, 2019, SCAG Pre-Certified Housing Data, 2021

As shown by **Table 4-21** (Demographics of Households with Severe Housing Cost Burden Orange County), severe housing cost burden is a large but not as frequent problem for residents in Orange County. The average rate of residents experiencing severe housing cost burden is 21.55% across the county. Overall, White residents have a rate of 17.30%, Black residents 22.57%, Hispanic residents 24.78%, Data for the Unincorporated Areas was unavailable.

The Orange County Housing Authority (OCHA) administers Section 8 Housing Choice vouchers within the County. According to the 2021 Annual Public Housing Authority (PHA) Plan, the Housing Authority has allocated 11,306 housing choice vouchers, which can relieve cost burden and overpayment.

There are approximately 135 assisted tenants (this includes various types of assistance, not just Housing Choice Vouchers) in Unincorporated County areas. However, OCHA does not have enough funding to issue all the vouchers allocated from HUD. Currently OCHA is not able to issue approximately 750 vouchers. OCHA would need approximately $14,775,000/annually to serve 100% of the allocated vouchers, increased annually to account for inflation. This amount includes both the cost of housing assistance and administration costs. This funding gap is for the entirety of the Housing Choice Voucher Program, not specifically for the Unincorporated County areas. OCHA serves all 34 cities and Unincorporated County areas. Thus, funding for those vouchers should come from a variety of sources, not just the County. The County will continue to pursue funding to be able to issue all allocated vouchers.

Table 4-21
Demographics of Households with Severe Housing Cost Burden, Orange County

Race/Ethnicity	Orange County		
	Number of Households	Number with Severe Cost Burden	% with Severe Cost Burden
White, non-Hispanic	540,773	93,564	17.30%
Black, non-Hispanic	16,719	3,774	22.57%
Hispanic	241,841	59,920	24.78%
Source: Orange County Analysis Of Impediments To Fair Housing Choice, April 2020			

As discussed above, for the purposes of this analysis the Unincorporated County area has been divided into three subareas: Central Orange County, North Orange County, and South Orange County. The data shown below is based on tract-level data of Unincorporated County areas tracts. **Table 4-22, Table 4-23,** and **Table 4-24** show monthly housing costs as a percentage of household income by Unincorporated County subarea and tenure. Most occupied households in all Unincorporated County subareas are owner-occupied. In Central OC, 60.3% of households are owner-occupied, 66% in North OC, and 68.8% in South OC.

According to the 2022 ACS (5-year estimates), 36.1% of owners with a mortgage in Orange County spend less than 20% of their income on housing compared to 31.3% of owners with mortgages in Los Angeles County, 33.9% in Riverside County, 35.5% in San Bernardino County, and 33% in San Diego County. The second largest proportion of owners with mortgages in Orange County (28.6%) spend more than 35% of their household income on housing compared to 34.3% in Los Angeles County, 30.4% in Riverside County, 28% in San Bernardino County, and 30% in San Diego County.

Over the past ten years, the proportion of owners with a mortgage spending more than 35% of their household income has decreased in the Unincorporated County. According to the 2012 ACS (5-year estimates). 38.9% of owners with mortgages paid more than 35% of their monthly income on housing compared to 27.3% during the 2022 ACS.

More than a third of owner-occupied households with a mortgage in the Unincorporated County areas, including all Unincorporated County subareas spend less than 20% of their household income on housing. Nearly 37% of owners with a mortgage in Central Orange County, 37.4% in North County, and 36.3% in South County spend less than 20% of their income on housing. Like the proportion of owners with mortgages spending less than 20% of their income on housing, the proportion of owners with mortgages spending more than 30% of their income on housing is comparable in Central, North, and South Orange County. Approximately 28% of owners with

mortgages in Central OC, 26.4% in North OC, and 27.5% in South OC spend more than 35% of their household income on housing.

Table 4-22
Owner-Occupied Households with a Mortgage
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated County areas
<20%	36.8%	37.4%	36.3%	36.8%
20% - 24.9%	14.7%	16.7%	15.2%	15.5%
25% - 29.9%	11.5%	10.5%	12.8%	11.8%
30% - 34.9%	8.9%	9.0%	8.1%	8.6%
>35%	28.1%	26.4%	27.5%	27.3%
Not computed	0.6%	0.4%	0.7%	0.6%
Total households	**30,265**	**35,018**	**56,081**	**121,364**

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

For owner-occupied households without a mortgage, Orange County as a whole has a smaller proportion that spend more than 35% of their household income on housing (12.7%) compared to the neighboring counties of Los Angeles (14%), Riverside (14.9%), and San Diego (13.5%) but larger than San Bernardino County (11.5%). The proportion of owners without a mortgage paying over 35% of their monthly income on housing has increased over the past ten years. According to the 2012 ACS, 11.6% of owners without a mortgage in the Unincorporated County areas paid more than 35% of their household income on housing compared to 13.4% during the 2022 ACS.

Table 4-23 shows monthly housing costs for owner-occupied households without a mortgage as a percentage of household income. Most owners without a mortgage in all Unincorporated County subareas spend less than 15% of their monthly income on housing, including 66% in Central OC, 65.3% in North OC, 63.7% in South OC, and 64.9% in the Unincorporated County areas. Predictably, the proportion of owners without a mortgage spending more than 35% is smaller than the proportion of owners with a mortgage. South OC has the largest proportion of owners without a mortgage spending more than 35% of their income on housing (15.4%) compared to Central OC (12.3%), North OC (12%), and the Unincorporated County areas as a whole (13.4%). As mentioned above, South OC has the largest proportion of owner-occupied households (compared to renter-occupied households) compared to Central and North OC.

Table 4-23
Owner-Occupied Households without a Mortgage
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated Areas
<10%	50.1%	47.7%	41.8%	46.2%
10% - 14.9%	15.9%	17.6%	21.9%	18.7%
15% - 19.9%	9.7%	10.3%	8.8%	9.5%
20% - 24.9%	5.6%	6.8%	5.8%	6.1%
25% - 29.9%	2.9%	3.2%	3.7%	3.3%
30% - 34.9%	3.5%	2.4%	2.7%	2.9%
>35%	12.3%	12.0%	15.4%	13.4%
Not computed	2.8%	1.5%	2.7%	2.3%
Total households	**14,220**	**15,105**	**17,429**	**46,754**

Source: American Community Survey, 5-year Estimates, 2022. Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Renter-occupied households tend to experience cost burden at a higher rate than owner-occupied households. According to the 2022 ACS, the largest proportion of renters in Orange County spend more than 35% of their monthly household income on housing (46.1%). In comparison, 47.9% of renters in Los Angeles County, 48% in Riverside County, 47.9% in San Bernardino County, and 47.3% in San Diego County spend more than 35% of their household income on housing. Between the 2012 and 2022 ACS, the proportion of renter-occupied households in the Unincorporated County areas has remained relatively constant. During the 2012 ACS, 45.4% of renters paid more than 35% of their household income on housing compared to 45.6% in 2022.

As shown in **Table 4-24**, nearly half of renters in all Unincorporated County subareas spend more than 35% of their monthly household income on housing including 46% in Central OC, 47.9% in North OC, and 43.4% in South OC.

Table 4-24
Renter-Occupied Households
Monthly Housing Costs as Percentage of Household Income

	Central OC	North OC	South OC	Unincorporated Areas
<15%	9.3%	6.5%	10.3%	8.8%
15% - 19.9%	9.1%	10.0%	10.2%	9.8%
20% - 24.9%	12.5%	11.6%	13.2%	12.5%
25% - 29.9%	12.7%	13.3%	12.1%	12.7%
30% - 34.9%	10.4%	10.7%	10.8%	10.6%
>35%	46.0%	47.9%	43.4%	45.6%
Not computed	5.9%	5.3%	7.7%	6.4%
Total households	**28,045**	**24,708**	**31,333**	**84,086**

Source: American Community Survey, 5-year Estimates, 2022. Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Overcrowding

Table 4-25 displays data for overcrowding in the Unincorporated County areas, Orange County, and the state. Overcrowding is defined as 1.01 to 1.5 persons per bedroom living in a household, and severe overcrowding is defined as more than 1.51 persons per bedroom. Overcrowding often occurs when nonfamily members combine incomes to live in one household, such as roommates. It also occurs when there are not enough size appropriate housing options for larger or multigenerational families. The data shows there are more overcrowded renter households in Unincorporated County areas and Orange County than the State (7.4%, 4.2% and 3.6%, respectively). Overcrowding in owner households is similar for all jurisdictions. The data shows that overcrowding disproportionately affects renter households over owner households.

Table 4-25
Households by Overcrowding

Overcrowding and Tenure	Unincorporated Areas	Orange County	California
Owner Households			
Overcrowded	1.6%	1.5%	1.6%
Severe Overcrowding	0.6%	0.6%	0.6%
Renter Households			
Overcrowded	7.4%	4.2%	3.6%
Severe Overcrowding	2.7%	2.6%	2.4%

Source: American Community Survey, 5-Year Estimates, 2019, SCAG Local Housing Metadata, 2018

Table 4-26 display comparative housing stock data for Orange County and California for overcrowded housing units by type. Data for the Unincorporated County areas is not available. A variety of housing stock provides increased opportunity in communities for different sizes and household types. The data shows that half of Orange County housing units are single-family, detached units. The State reports a slightly higher percentage; however, it has a much lower percentage of single-family, attached units than Orange County (7% and 12.3%, respectively). Multifamily housing developments of 10 or more units are of similar percentages for both jurisdictions, with 19.1% for Orange County and 17.5% in California.

Table 4-26
Overcrowded Housing Units by Type

Housing Unit Type	Orange County	California
1-Unit, Detached	50.6%	57.7%
1-Unit, Attached	12.3%	7.0%
2 Units	1.6%	2.4%
3 or 4 Units	6.9%	5.5%
5 to 9 Units	6.7%	6.0%
10 to 19 Units	5.4%	5.2%
20 or More Units	13.7%	12.3%
Mobile Home	2.7%	3.7%
Boat, RV, Van, etc.	0.1%	0.1%
Source: American Community Survey, 5-Year Estimates, 2019.		

According to the 2022 ACS, 3.9% of owner-occupied households in Orange County as a whole are overcrowded including 1% that are severely overcrowded. Orange County has a smaller proportion of overcrowded owner-occupied households compared to Los Angeles County (5.8% overcrowded, 1.7% severely overcrowded), Riverside County (5.1% overcrowded, 1.2% severely overcrowded), and San Bernardino County (5.9% overcrowded, 1.6% severely overcrowded), but a slightly larger proportion than San Diego County (3.6% overcrowded, 0.9% severely overcrowded).

Renter households are significantly more likely to experience overcrowding. In Orange County, 15% of renter households are overcrowded and 6.1% are severely overcrowded. Orange County has a larger population of overcrowded renter households compared to Riverside County (12.4% overcrowded, 6.1% severely overcrowded), San Bernardino County (14% overcrowded, 4.7% severely overcrowded), and San Diego County (10.8% overcrowded, 4.2% severely

overcrowded), but a smaller proportion compared to Los Angeles County (15.6% overcrowded, 7.3% severely overcrowded).

Based on 2012 ACS estimates, the proportion of owner- and renter-occupied households experiencing overcrowding in Orange County has decreased. During the 2012 ACS, it was estimated that 4.1% of owner households and 17% of renter households were overcrowded Countywide.

Table 4-27 shows persons per room by tenure and Unincorporated subarea. A smaller proportion of both owners and renters experience overcrowding in the Unincorporated County areas compared to the County as a whole. Approximately 2.5% of owners in the Unincorporated areas are overcrowded, including 0.7% severely overcrowded, and 9.9% are renters are overcrowded, including 3.8% severely overcrowded. The Unincorporated South County area has a smaller proportion of overcrowded owner households compared to the Central and North areas. North Orange County has the largest proportion of overcrowded renters (16.8%) compared to Central (9.2%) and South OC (5.2%).

Table 4-27
Persons per Room by Unincorporated Subarea and Tenure

	Central OC	North OC	South OC	Unincorporated Areas
Owner-occupied				
Total	45,045	50,514	74364	169923
<1.0 persons per room	96.7%	96.8%	98.5%	97.5%
>1.0 persons per room (overcrowded)	3.3%	3.2%	1.5%	2.5%
>1.5 persons per room (severely overcrowded)	1.2%	0.7%	0.3%	0.7%
Renter-occupied				
Total	29,689	26,021	33,731	89,441
<1.0 persons per room	90.8%	83.2%	94.8%	90.1%
>1.0 persons per room (overcrowded)	9.2%	16.8%	5.2%	9.9%
>1.5 persons per room (severely overcrowded)	2.5%	7.3%	2.4%	3.8%
All households				
Total	74,734	76,535	108,095	259,364
<1.0 persons per room	94.3%	92.2%	97.4%	95.0%
>1.0 persons per room (overcrowded)	5.7%	7.8%	2.6%	5.0%
>1.5 persons per room (severely overcrowded)	1.7%	2.9%	1.0%	1.8%

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Substandard Housing

Table 4-28 below displays housing stock by year built for Unincorporated County areas, Orange County and California. Older housing generally requires more upkeep, regular maintenance, and can cause a cost burden on both renters and homeowners. The data shows a greater percentage of homes built throughout California before 1960 compared to Orange County as a whole. Housing stock in Unincorporated County areas are similar to the State with 24.8% and 28.4%, respectively, of homes built before 1960. Orange County experienced a large housing boom between 1960 and 2000 which resulted in the development of about 70% of the total housing stock. In comparison, 57% of the State's housing stock was built during those 40 years. Overall, increased numbers of older housing can lead to displacement, cost burden, and substandard living conditions.

Table 4-28
Percentage of Housing Units by Year Built

Year Built	Unincorporated Areas	Orange County	California
Built 2014 or later	3.4%	2.7%	1.7%
Built 2010 to 2013		2.0%	1.7%
Built 2000 to 2009	22.1%	8.3%	11.2%
Built 1990 to 1999	14.7%	11.7%	10.9%
Built 1980 to 1989	7.3%	14.9%	15.0%
Built 1970 to 1979	9.7%	23.3%	17.6%
Built 1960 to 1969	18.1%	19.5%	13.4%
Built 1950 to 1959	20.4%	13.0%	13.4%
Built 1940 to 1949	1.9%	2.1%	5.9%
Built 1939 or earlier	2.5%	2.5%	9.1%
Source: American Community Survey, 5-Year Estimates, 2018,2019			

Through the Neighborhood Preservation program, the County identified 49 units in the Unincorporated County areas in need of maintenance or some repair between 2014 to 2021. Substandard units are those in need of repair or replacement. Based on 2019 ACS data for the Unincorporated County areas, approximately 0.34% of housing units (144 units) lack complete plumbing facilities, 1% (424 units) lack complete kitchen facilities, and 1% (424 units) do not have telephone service available. In Orange County, approximately 0.39% of housing units (4,292 units) lack complete plumbing facilities, 1.29% (14,196 units) lack complete kitchen facilities, and 1.95% (21,450 units) do not have telephone service available. Comparatively, in the Los Angeles County Service Area, 5.7% of homes have a basic housing quality problem,

4.4% in Riverside County and 7.2% in San Diego County have a basic housing quality problem – either a moderate or severe physical problem.[21]

The current distribution of the age of homes in Orange County as a whole (**Table 4-29**), also indicates that a majority of homes were built prior to the 1990 Americans with Disabilities Act (ADA), which may result in a lack of accessible homes for those residents experiencing a disability. Comparatively, homes in Unincorporated CDPs are newer – with 42% being built post-1989, compared to only 24.7% built in that same time period in Orange County as a whole. In Orange County as a whole 75.3% of homes pre-date 1989. The data for Unincorporated CDPs shows that in the areas covered by the CDPs the urgency of rehabilitating housing stock is not as acute as in Orange County as a whole. In contrast to the Unincorporated CDPs, Orange County's older housing stock reflects a rapidly gaining need to rehabilitate housing to meet minimum livability and quality requirements, which is a barrier to many homeowners and residents in Orange County who have a lower income or a fixed income.

In general, housing units that are 30 years or older are more likely to need minor rehabilitation or repairs while housing units aged 50 or older are more likely to need major rehabilitation. According to the 2022 ACS (5-year estimates), 35.4% of housing units in Orange County as a whole were built prior to 1970 and are aged 50 or older and 37.4% were built between 1970 and 1990. In comparison, 58.1% of housing units in Los Angeles County were built prior to 1970, 17% in Riverside County, 28.2% in San Bernardino County, and 29.3% in San Diego County. Of housing units built prior to 1990, Orange County has a proportion (72.8%) comparable to San Diego County (70.1%) and San Bernardino County (67%), larger than Riverside County (51.3%) and smaller than Los Angeles County (83.8%).

Table 4-29 shows when housing units were built in Unincorporated County subareas. In the Central and North Unincorporated County areas, the largest proportion of housing units were built between 1960 and 1979, whereas the most housing units in the South Unincorporated County areas were built between 1990 and 2019.

[21] National Center for Healthy Housing, Los Angeles, Riverside and San Diego CA Metrics, 2018. Accessed Online: January 18, 2022. https://nchh.org/tools-and-data/data/state-of-healthy-housing/rankings/location/los-angeles-ca/?data-year=2018

Table 4-29
Year Housing Unit Built by Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated Areas
Built 2020 or later	0.4%	0.1%	1.5%	0.8%
Built 2010 to 2019	6.7%	5.3%	20.6%	12.3%
Built 2000 to 2009	7.7%	7.7%	16.5%	11.5%
Built 1990 to 1999	11.5%	8.2%	23.5%	15.7%
Built 1980 to 1989	13.4%	13.7%	14.8%	14.1%
Built 1970 to 1979	22.7%	25.7%	12.0%	19.0%
Built 1960 to 1969	23.1%	20.8%	5.3%	14.8%
Built 1950 to 1959	12.5%	16.3%	2.5%	9.3%
Built 1940 to 1949	1.1%	1.0%	1.3%	1.2%
Built 1939 or earlier	0.9%	1.1%	2.1%	1.4%
Total households	**78,891**	**79,385**	**118,939**	**277,215**

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.

Units lacking complete plumbing or kitchen facilities can also be indicators for substandard housing. As shown in **Table 4-30**, North Orange County has the largest proportion of households lacking complete plumbing facilities. However, only 0.3% of households in North Orange County (0.2% of owner-occupied households and 0.4% of renter-occupied households) lack complete plumbing facilities. In the Unincorporated County areas as a whole, 0.2% of both owner-occupied and renter-occupied households lack complete plumbing facilities.

Table 4-31 shows units lacking complete kitchen facilities by tenure and Unincorporated subarea. A larger proportion of households in the Unincorporated County areas (1%) lack complete kitchen facilities compared to plumbing facilities. Like the trend for plumbing facilities, North Orange County has the largest proportion of occupied units lacking complete kitchen facilities (1.6%) compared to Central (0.8%) and South (0.6%) Orange County. Additionally, a larger proportion of renter-occupied households in the Unincorporated County areas lack complete kitchen facilities (2.3%) compared to owner-occupied households (0.3%).

Table 4-30
Units Lacking Complete Plumbing Facilities by Tenure and Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated County Areas
Owner-occupied				
Total households	45,045	50,514	74,364	169,923
Complete plumbing facilities	99.9%	99.8%	99.8%	99.8%
Lacking plumbing facilities	0.1%	0.2%	0.2%	0.2%
Renter-occupied				
Total households	29,689	26,021	33,731	89,441
Complete plumbing facilities	100.0%	99.6%	99.9%	99.8%
Lacking plumbing facilities	0.0%	0.4%	0.1%	0.2%
All households				
Total households	74,734	76,535	108,095	259,364
Complete plumbing facilities	99.9%	99.7%	99.8%	99.8%
Lacking plumbing facilities	0.1%	0.3%	0.2%	0.2%

Source: American Community Survey, 5-year Estimates, 2022.
Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated areas.

Table 4-31
Units Lacking Complete Kitchen Facilities by Tenure and Unincorporated Subarea

	Central OC	North OC	South OC	Unincorporated County Areas
Owner-occupied				
Total households	45,045	50,514	74,364	169,923
Complete plumbing facilities	99.8%	99.8%	99.7%	99.7%
Lacking plumbing facilities	0.2%	0.2%	0.3%	0.3%
Renter-occupied				
Total households	29,689	26,021	33,731	89,441
Complete plumbing facilities	98.3%	95.6%	98.9%	97.7%
Lacking plumbing facilities	1.7%	4.4%	1.1%	2.3%
All households				
Total households	74,734	76,535	108,095	259,364
Complete plumbing facilities	99.2%	98.4%	99.4%	99.0%

Lacking plumbing facilities	0.8%	1.6%	0.6%	1.0%
Source: American Community Survey, 5-year Estimates, 2022. Note: Percentages and totals were calculated based on all tracts in each subarea that contain Unincorporated County areas.				

Homelessness

People experiencing homelessness are those who do not have a fixed, regular, and adequate overnight residence, or whose overnight residence is a shelter, street, vehicle, or enclosure or structure unfit for habitation. Factors contributing to increases of homelessness may include the following:

- Lack of access to available resources to support stable housing access.
- Spikes in rent increase and lack of tenant protections.
- Housing discrimination.
- Evictions and lack of support or relocation services available.
- Lack of housing affordable to very low, low- and moderate-income persons/households.
- Increases in the number of persons whose incomes fall below the poverty level.
- Reductions in public subsidies to the poor.
- The deinstitutionalization of the mentally ill.

According to the Orange County Homeless Point-in-Time Count, in 2019 there were an estimated 43 unhoused persons in the Unincorporated County areas. The counts for 2020 and 2021 were provided by 2-1-1 Orange County and these reports provide total figures for Orange County as a whole and do not break down the figures for each city and the Unincorporated County areas. In 2020, a total of 3,017 persons experienced homelessness across Orange County, this decreased to 2,441 in 2021.

The racial and ethnic demographic data for unhoused persons in 2021 is not broken down by jurisdictions; however, for the 2,441 unhoused persons across Orange County accessing shelter, 10% experienced chronic homelessness. Additionally, 77% identified as White, 12% identified as Black, 3% identified as American Indian, less than 1% identified as Native Hawaiian, and 45% identified as Hispanic or Latino. About 295 persons were seniors (age 62 years and older), and about 102 persons were transzonal aged youth between the ages of 18 to 24, 288 persons were experiencing domestic violence, and 162 persons were veterans. Of the persons living in shelters, 334 experience mental health conditions, 308 persons experience a physical disability, and 297 persons reported substance abuse.[22]

[22] Orange County Homeless Point-in-Time Count, Orange County Homeless Management Information Systems. 2019, 2020 and 2021. Accessed online: January 19, 2021.

The results from the 2024 Point-in-Time (PIT) count were recently released (as of July 2024). The 2024 PIT count includes geographic breakdowns for populations of persons experiencing homelessness. According to the 2024 count, there were 3,227 persons counted experiencing homelessness in North Orange County (1,646 unsheltered and 1,581 sheltered) including six unsheltered individuals in the Unincorporated North County areas. In Central Orange County, 3,454 persons were counted during the 2024 PIT count (2,036 unsheltered and 1,418 sheltered) including 35 in the Unincorporated County areas (21 unsheltered and 14 sheltered). South Orange County had the smallest share of persons experiencing homelessness, totaling 641 persons (491 unsheltered and 150 sheltered), including only three unsheltered individuals in the Unincorporated County areas. Overall, the Central Unincorporated County area has the largest population of persons experiencing homelessness compared to the North and South Unincorporated County areas.

Displacement

The potential for economic displacement risk can result from a variety of factors, including large-scale development activity, neighborhood reinvestment, infrastructure investments, and changes in local and regional employment opportunity. Economic displacement can be an inadvertent result of public and private investment, where individuals and families may not be able to keep pace with increased property values and market rental rates.

Urban Displacement

The Urban Displacement Project developed a neighborhood change database to map neighborhood transformations and identify areas vulnerable to gentrification and displacement. This data was developed to assist local decision makers and stakeholders better plan for existing communities and provide additional resources to areas in need or at-risk of displacement and gentrification. The following lists the criteria used to identify each displacement typology used in **Figure 4-16**:

Low-Income/Susceptible to Displacement.

- Low or mixed low-income tract in 2018.

Ongoing Displacement of Low-Income Households.

- Low or mixed low-income tract in 2018.
- Absolute loss of low-income households, 2000-2018.

At Risk of Gentrification.

- Low or mixed low-income tract in 2018.
- Housing affordable to low or mixed low-income households in 2018.

- Didn't gentrify 1990-2000 or 2000-2018.
- Marginal change in housing costs or Zillow home or rental value increases in the 9^{0t}h percentile between 2012-2018.
- Local and nearby increases in rent were greater than the regional median between 2012-2018 or the 2018 rent gap is greater than the regional median rent gap.

Early/Ongoing Gentrification.

- Low or mixed low-income tract in 2018.
- Housing affordable to moderate- or mixed-moderate-income households in 2018.
- Increase or rapid increase in housing costs or above regional median. change in Zillow home or rental values between 2-12-2018.
- Gentrified in 1990-2000 or 2000-2018.

Advanced Gentrification.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Marginal change, increase, or rapid increase in housing costs.
- Gentrified in 1990-2000 or 2000-2018.

Stable Moderate/Mixed Income.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.

At Risk of Becoming Exclusive.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Marginal change or increase in housing costs.

Becoming Exclusive.

- Moderate, mixed moderate, mixed high, or high-income tract in 2018.
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.
- Rapid increase in housing costs.

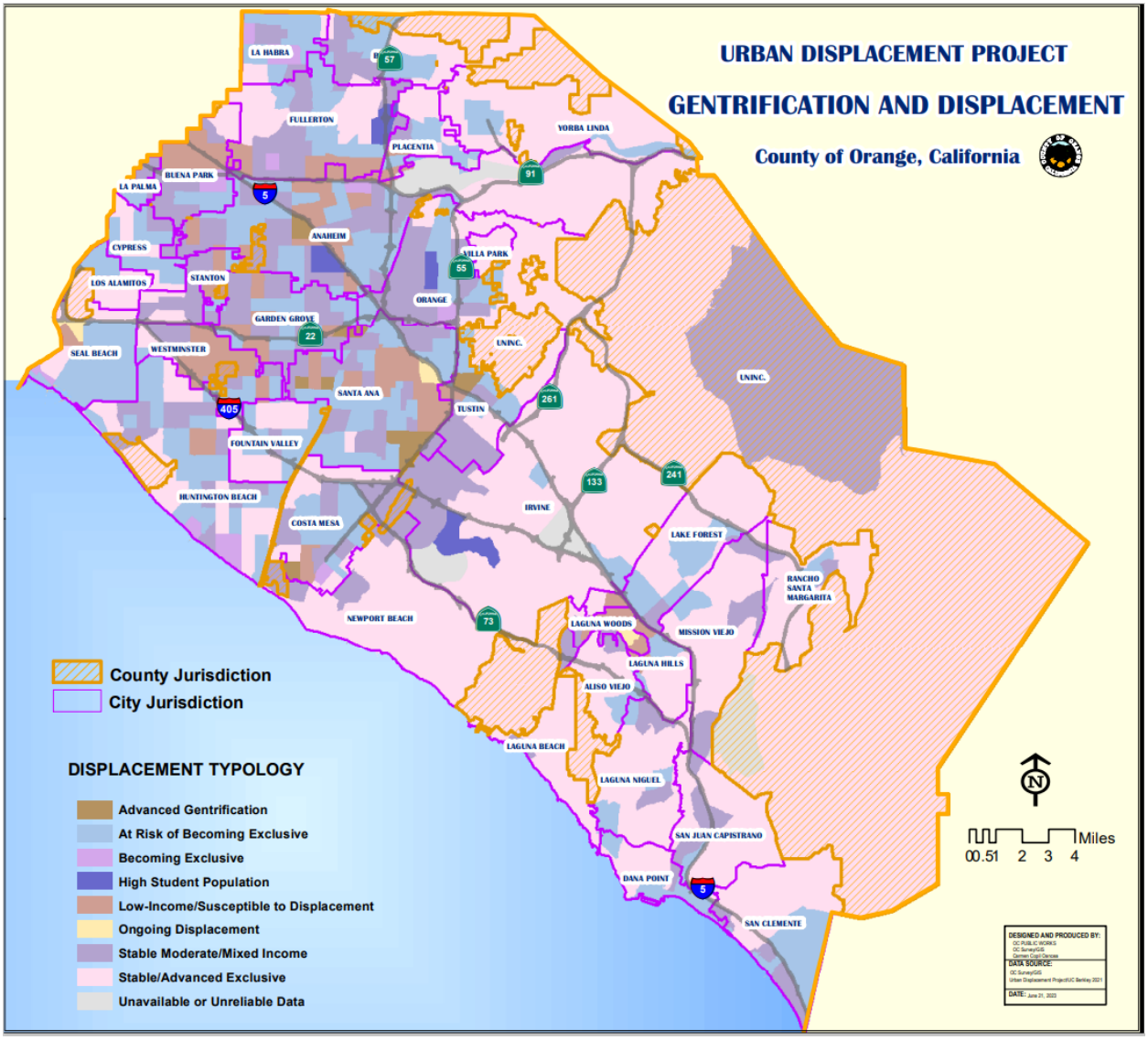
- Absolute loss of low-income households, 2000-2018.
- Declining low-income in-migration rate, 2012-2018.
- Median income higher in 2018 than in 2000.

Stable/Advanced Exclusive.

- High-income tract in 2000 and 2018.
- Affordable to high or mixed high-income households in 2018.
- Marginal change, increase, or rapid increase in housing costs.

As **Figure 4-16** shows, Orange County as a region is made up of a variety of displacement risks with very high levels of exclusivity in the southern region of Orange County and higher occurrences of gentrification and displacement occurring in the central and northern regions of Orange County. It should be noted that **Figure 4-16** also shows a large area of stable/advanced exclusivity in the southeastern region, which is largely made up of undeveloped, mountainous land. However, the region surrounding Santa Ana through the northern portion of Orange County represents areas with lower median incomes and higher likelihood to experience displacement and gentrification.

Figure 4-16
Urban Displacement Project –
Gentrification and Displacement in Orange County



Source: Urban Displacement Project, University of California Berkeley (2021).

Preservation of Assisted Units at Risk of Conversion

Preservation of assisted units is an important goal for assuring that displacement is kept at a minimum. State Housing Element Law requires the analysis of government-assisted housing units that are eligible to convert from low-income housing to market rate housing during the next 10 years due to expiring subsidies, mortgage prepayments, or expiration of affordability restrictions, and identification of programs aimed at their preservation.

Use restrictions, as defined by State law, means any federal, state, or local statute, regulation, ordinance, or contract which as a condition of receipt of any housing assistance, including a rental subsidy, mortgage subsidy, or mortgage insurance, to an assisted housing development, establishes maximum limitations on tenant income as a condition of eligibility for occupancy.

The following section analyzes the potential conversion of assisted housing units to market rate housing.

Status of Covenants of Inventory of Affordable Housing Units Assisted by the County

Affordable covenants help to ensure that certain housing units remain affordable for an extended period of time. Covenants provide lasting affordable options to low and very low-income households in a community. **Table 4-32** below provides a list of 2,771 housing units with affordability covenants that received financial assistance from the County of Orange for their development. Of the units at-risk of converting to market-rate during the planning period, no units are located within the Unincorporated County areas; however, the County has maintained financial interest and support for the units at-risk and will continue to do so throughout the planning period.

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Assisted Units At-Risk of Converting to Market Rate During the Planning Period in Cities					
Canada & Marquita Apartments	143 West Marquita & 133—- 135 W. Canada San Clemente, CA 92672	HOME	12	12	11/4/2026
Village Heights Apartments	1621 Mesa Dr., Newport Beach, CA 92660	OCDA	75	25	4/1/2028
Assisted Units Not At-Risk During the Planning Period					
Pacific Terrace	15000 Pacific St., Midway City	Market-to-Market	98	97	2041*
Walnut Village Apartments	620 S. Walnut Ave., Brea, CA 92821	HOME	47	11	11/27/2036
Bishop Avenue	8142 Bishop Ave., Midway City, CA 92655	HOME	10	10	10/22/2038
Mercy House Scattered Houses	2426 Athens, Orange, CA 92867 9511 S. Mills, Anaheim, CA 92804 2106 W. Niobe, Anaheim, CA 92804 10882 MacMurray, Anaheim, CA 92804	NSP	4	4	2041-2043
Costa Mesa Village	2450 Newport Blvd., Costa Mesa, CA 92627	OCHA	96	95	5/11/2043
Walnut Court & Pixley Arms Apartments	Walnut: 1519 E. Walnut Ave. / Pixley: 537 W. Almond	OCHA	22	22	12/15/2047
Villa Camino Real	601-607-609 La Habra Blvd, Fullerton, CA	OCHA	12	23	5/4/2048
Inn at Woodbridge Apartments	11 Osborne, Irvine, CA 92604	OCHA	116	56	8/9/2049
Park Stanton Place Senior Apartments	7622 Katella Ave., Stanton, CA 90680	OCHA	335	67	12/20/2049
Irvine Inn (SRO)**	2810 Warner Avenue, Irvine, CA 92606	OCHA	192	39	6/23/2050
Woodpark Apartments	22702 Pacific Park Drive, Aliso Viejo, CA	OCHA	128	108	8/8/2050
Arroyo Vista Apartments	26196 Crown Valley Parkway, Mission Viejo, CA 92692	OCHA	156	76	10/21/2050
Fullerton City Lights SRO*	224 E. Commonwealth Ave., Fullerton, CA 92832	OCHA	136	116	4/23/2050
Esencia Norte Apartment Homes***	86 Esencia Dr., Ladera Ranch	MHRB	112	111	8/25/2051
Sendero Bluffs Senior Apartment Homes***	30472 Gateway Place, Rancho Mission Viejo	MHRB	107	106	8/25/2051
Camden Place Senior Apartments	4500 Montecito Drive, La Palma, CA 90623	HOME	35	11	9/22/2052
Plaza Court Apartments	11440 Court Street #4102, Stanton, CA 90680	CDBG	120	25	12/15/2052
El Modena Transitional Shelter	18662-18682 E. Pearl St., Orange, CA 92869	CDBG	6	5	3/25/2053
Vintage Canyon Senior Apartments	855 N. Brea Blvd., Brea, CA 92821	NSP/HOME	105	11	6/10/2053
Midway City SRO**	15161 Jackson St., Midway City, CA	HOME/OCDA	18	9	8/3/2053
Heritage Villas	26836 Oso Pkwy., Mission Viejo, CA 92691	HOME/OC BONDS	143	11/58	8/8/2053
Heritage Place at Tustin	1101 Sycamore Ave., Tustin, CA 92780	OCHA	54	53	11/1/2056
H.O.M.E.S. Inc.- Riley House	466 N Swidler Street, Orange, CA 92869	OPS RESERVE	6	6	7/10/2057
Vintage Shores	366 Camino De Estrella, San Clemente, CA	HOME	122	11	3/26/2058
Westminster Intergenerational	8140 13th St., Westminster, CA 92683	OCDA	86	85	4/5/2058
Linbrook Court	2240 W. Lincoln Ave., Anaheim, CA 928001	HOME	81	80	7/30/2058

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Mendocino at Talega I	123 Calle Amistad, San Clemente, CA 92673	HOME/OCDA	124	11/112	11/24/2058
Mendocino at Talega II	123 Calle Amistad, San Clemente, CA 92673	OCDA	62	62	11/24/2058
California Villas	935 S. Gilbert St., Anaheim, CA 92804	HOME	34	11	12/18/2058
Thomas House	12591 and 12601 Morningside Ave., Garden Grove, CA	CDBG	22	14	2/19/2059
Laurel Glen aka Ladera Ranch	70 Sklar St., Ladera Ranch	OCDA	220	44	2/23/2059
Casa Alegre	2761 W. Ball Rd., Anaheim, CA 92804	HOME	23	22	6/22/2059
Coventry Heights Senior Apartments	7521 Wyoming St., Westminster, CA 92683	GenFund	76	76	6/22/2059
Solara Court Apartments	3335 W. Lincoln Avenue, Anaheim, CA	HOME	132	131	10/24/2059
Jackson Aisle Apartments	15432 Jackson St., Midway City	OCDA	30	29	11/10/2059
Alice Court	450 Glenneyre Street, Laguna Beach, CA 92651	OCDA	27	13	11/19/2059
Escalones Nuevos	150 Escalones, San Clemente, CA	CDBG	6	6	2/24/2060
Casa de la Esperanza	10572 Knott Ave., Stanton, CA 90680	HOME	10	4	8/15/2060
Jasmine At Founders Village	17911 Bushard St, Fountain Valley, CA 92708	SPAHF	156	42	2/10/2061
Montecito Vista Apartment Homes	4000 El Camino Real, Irvine, CA	HOME/OCDA	162	11	6/21/2061
Ability First	14501 Harvard Ave., Irvine, CA 92606	HOME	24	11	9/28/2061
Laguna Canyon	400 Limestone, Irvine, CA 92603	OPS RESERVE	120	57	10/18/2061
Cornerstone Apartments	9541 Ball Rd., Anaheim, CA 92804	HOME/OCDA	48	11/37	4/6/2062
Windrow Apartments	5300 Trabuco Rd, Irvine, CA 92620	OCDA	96	47	6/22/2062
Dorado Senior Apartments	8622 Stanton Ave, Buena Park, CA 90620	HOME/OCDA	150	11/103	9/17/2062
Woodbury Walk Apartments	99 Talisman, Irvine, CA 92620	HOME/OCDA	150	73	5/8/2063
Stonegate I (Anaheim)	9051 W. Katella Ave., Anaheim, CA 92804	HOME/OCDA	37	11	9/9/2064
Stonegate II (Anaheim-Katella)	8911 W. Katella Ave., Anaheim, CA 92804	HOME/OCDA	26	11	9/9/2064
Diamond Aisle	1310 W. Diamond St., Anaheim, CA 92801	MHSA	25	24	12/22/2064
Granite Court	2853 Kelvin Ave., Irvine, CA 92614	HOME/OCDA	71	11/24	2/9/2065
Bonterra Apartment Homes	401 Discovery Lane, Brea, CA 92812	HOME/OCDA	94	82/11	7/1/2065
Doria II—- Stonegate Irvine Families	1000 Crested Bird, Irvine, CA 92614	HOME/OCDA	74	37	1/9/2066
Buena Vista Apartments	16437 E. Buena Vista St., Orange, CA 92865	HOME/OCDA	17	11/6	3/14/2066
Calle del Cerro	1042 Calle Del Cerro #201 1050 Calle Del Cerro #604 1052 Calle Del Cerro #712 1064 Calle Del Cerro #1303	NSP	4	4	6/16/2066
Doria I—- Stonegate Irvine Families	1000 Crested Bird, Irvine, CA 92614	HOME/MHSA	60	29	9/3/2066
Avenida Villas Families	9602 W Ball Rd., Anaheim, CA 92804	HOME/OCDA	29	11/17	11/7/2066
Birch Hills	255 S. Kraemer Blvd., Brea, CA 92821	HOME	114	11/45	6/21/2067
Cotto"s Point	2358 S El Cami Real, San Clemente, CA 92672	HOME	75	27	7/1/2067
8329 Lola Avenue, Stanton, CA 90680	8329 Lola Avenue, Stanton, CA 90680	HOME-SFR/HSA	1	1	8/4/2069
283 Laurel Avenue, Brea, CA, 92821	283 Laurel Avenue, Brea, CA, 92821	HOME-SFR/HSA	1	1	8/13/2069
802 Mathewson Avenue, Placentia, CA 92970	802 Mathewson Avenue, Placentia, CA 92970	HOME-SFR/HSA	1	1	9/23/2069
Oakcrest Heights	22733 Oakcrest Circle, Yorba Linda, CA 92887	HOME/HAS	54	11/3	6/15/2072

Table 4-32
County of Orange – Status of Assisted Affordable Units

Name of Project	Address	Funding	Total Units	Assisted Units	Expiration Date
Potters Lane	15171 Jackson St., Midway City	HSA	16	15	11/21/2073
Placentia Veterans Village	1945 East Veterans Way, Placentia, CA 92870	HAS	50	24	12/20/2073

**Pacific Terrace has renewed their Market-to-Market contract which expired on 10/31/2021. The development is now preserved through 2041.*
***The Census does not define SROs as individual units as residents share facilities. However, the County tracts SRO covenants and has therefore included them as part of this analysis.*
**** County owned land as part of the Ranch Affordable Housing Implementation Agreement; once the projects reach the 15 year expiration of the tax credits/bonds the property will be transferred to the County.*
Source: OC Community Resources – Housing & Community Development

Contributing Factors to Disproportionate Housing Needs and Displacement

A number of factors influence the disproportionate housing needs identified above and create a risk of displacement for lower-income households. As **Figure 4-16** demonstrates, a large portion of Orange County as a whole are now established/exclusive areas. Within the Unincorporated County areas, there is a mix, with some pockets that are either established middle-income areas, at risk of becoming exclusive, or are susceptible to or have ongoing displacement. The Unincorporated County areas specifically appear to have a mismatch between the demand for larger affordable units and the available affordable units, as well as (similar to the rest of Orange County) high housing costs. The specific factors which contribute to disproportionate housing needs within the Unincorporated County areas are:

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of affordable housing
- Source of income discrimination

Discussion of Site Inventory Related to People with Protected Characteristics, Lower Incomes, and Opportunity Areas

California Assembly Bill 686 (AB 686) requires that jurisdictions identify candidate housing sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA (provided in Appendix B), but also whether the identified candidate housing sites in **Table B-8** *Orange County Candidate Housing Site Inventory*, serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

Selection of candidate housing sites take into consideration access to vital goods, services, and public transportation, and are therefore ideal areas for the County to focus much of its future housing growth. It is anticipated that accessory dwelling unit (ADU) production will occur in the lower density areas of the community.

Approximately 34% of persons from all racial groups in the Unincorporated County areas identify ethnically as Hispanic or Latino. Over 93% of candidate housing sites are located in areas that have equal to or less than 40% of the population identifying as Hispanic or Latino.

The data in **Figures 4-17, 4-20, 4-21, 4-22, 4-23, 4-24, 4-25, 4-26, 4-27, 4-28, 4-29, 4-30** identify the candidate housing sites to accommodate future housing in the County, overlaid on demographics data using AFFH data layers for segregation and integration and access to opportunities provided through HCD data and mapping resources. The data demonstrates that the candidate sites are well located throughout Unincorporated County areas to serve its diverse population.

Candidate Sites and Non-White Population

The distribution of RHNA units by racial/ethnic minority population at the tract level is shown in **Table 4-33** and **Figure 4-17**. As discussed previously, tracts with larger racial/ethnic minority populations tend to be located predominantly in the Central and Northern Orange County areas. Of the sites with units identified to meet the RHNA, 61% are in tracts where 21% to 40% of the population belongs to a racial/ethnic minority group, 13.3% are in tracts where 41% to 60% of the population belongs to a racial/ethnic minority group, 18.8% are in tracts where 61% to 80% of the population belongs to a racial/ethnic minority group, and 6.9% are in tracts where more than 80% of the population belongs to a racial/ethnic minority group. A larger proportion of units allocated towards the lower-income RHNA are in tracts where more than 60% of the population belongs to a racial/ethnic minority group (51.2%) compared to moderate-income units (15.3%) and above-moderate-income units (0.1%).

Table 4-33
Sites Inventory by Racial/Ethnic Minority Population

Racial/Ethnic Minority Population (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
21-40%	1593	32.0%	1476	74.0%	3718	89.8%	6787	61.0%
41-60%	840	16.9%	215	10.8%	420	10.1%	1475	13.3%
61-80%	1928	38.7%	157	7.9%	4	0.1%	2089	18.8%
>80%	622	12.5%	147	7.4%	0	0.0%	769	6.9%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable racial/ethnic minority populations within a single population range (i.e., there are multiple tracts containing RHNA units with racial/ethnic minority populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with racial/ethnic minority populations in this range).

The distribution of RHNA units can also be shown by CDP and Unincorporated tract. Sites identified to meet the County's RHNA are located in the following CDPs or tracts (if not within a specific CDP). CDPs and Unincorporated tracts containing RHNA sites are also shown in **Figure 4-18** and **Figure 4-19**.

- Rossmoor (North Orange County)
- Midway City (Central Orange County)
- North Tustin (Central Orange County)
- Coto de Caza (South Orange County)
- Ladera Ranch (South Orange County)
- Las Flores (South Orange County)
- Rancho Mission Viejo (South Orange County)
- Silverado (South Orange County)
- Trabuco Canyon (South Orange County)
- Tract 218.16 – North Orange County, between Placentia and Yorba Linda
- Tract 218.25 – North Orange County, east of Yorba Linda
- Tract 219.13 – North Orange County, east of Orange and north of Tustin
- Tract 756.04 – North Orange County, east of Orange and north of Tustin
- Tract 762.01 – North Orange County, north of Orange
- Tract 762.02 – North Orange County, north of Orange
- Tract 871.01 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 877.01 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 877.03 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 878.05 – North Orange County, north of Garden Grove and west of Anaheim

- Tract 878.06 – North Orange County, north of Garden Grove and west of Anaheim
- Tract 626.45 – Central Orange County, northeast of Newport Beach and adjacent to UCI
- Tract 992.27 – Central Orange County, between Fountain Valley and Santa Ana
- Tract 320.11 – South Orange County, along northern County border and north of Rancho Santa Margarita

In the North County, tracts 218.25, 219.13, 756.04, 762.01, and 762.02 have the highest concentration of RHNA units. These tracts are in the northeastern corner of the North County area. Tracts in the northern Unincorporated County generally have larger proportions of non-White residents compared to the Central and South County areas. Unincorporated Midway City in the Central County has the largest proportion of RHNA units, totaling 2,043 units (1,907 lower-income, 132 moderate-income, and 4 above-moderate-income). Tracts in Midway City have racial/ethnic minority populations ranging from 76.5% to 97.3%.

In South Orange County, Rancho Mission Viejo (in the Unincorporated County) has the largest proportion of RHNA units (165 lower-income, 1,000 moderate-income, and 3,001 above-moderate-income). Consistent with the trend throughout South Orange County, only 37.5% of persons in the Rancho Mission Viejo tract containing RHNA units belong to a racial or ethnic minority group.

Table 4-34
Sites Inventory by Racial/Ethnic Minority Population – CDP and Unincorporated Tract

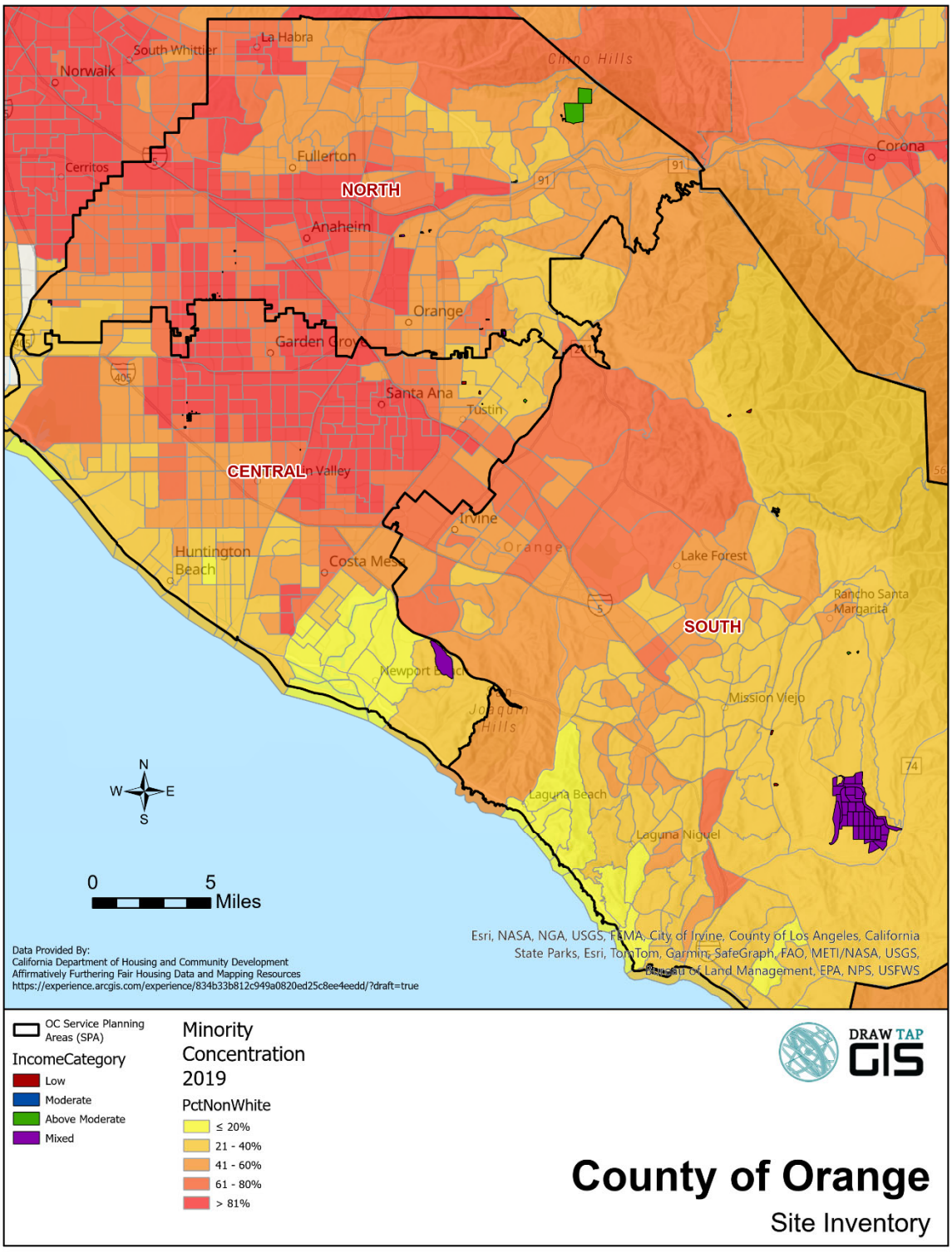
Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% Non-White Pop.
Northern Unincorporated County					
Rossmoor	525	188	0	713	36.4%
Tract 218.16	130	0	44	174	34.2%
Tract 218.25	0	0	420	420	41.0%
Tract 219.13	302	26	0	328	76.1%
Tract 756.04	351	164	0	515	30.3%
Tract 762.01	409	215	0	624	55.6%
Tract 762.02	431	0	0	431	57.4%
Tract 871.01	177	0	0	177	74.7%
Tract 877.01	0	36	0	36	74.0%
Tract 877.03	50	0	0	50	81.2%
Tract 878.05	0	31	0	31	82.5%
Tract 878.06	114	48	0	162	86.0%
Central Unincorporated County					

Table 4-34
Sites Inventory by Racial/Ethnic Minority Population – CDP and Unincorporated Tract

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% Non-White Pop.
Midway City	1907	132	4	2043	76.5% - 87.3%
North Tustin	45	0	63	108	30.0% - 36.2%
Tract 626.45	62	124	432	618	25.2%
Tract 992.27	0	31	0	31	74.3%
Southern Unincorporated County					
Coto de Caza	0	0	113	113	21.5% – 22.1%
Ladera Ranch	30	0	0	30	37.5%
Las Flores	60	0	0	60	37.5%
Rancho Mission Viejo	165	1000	3001	4166	37.5%
Silverado	180	0	0	180	21.8%
Trabuco Canyon	0	0	65	65	28.9%
Tract 320.11	45	0	0	45	21.8%

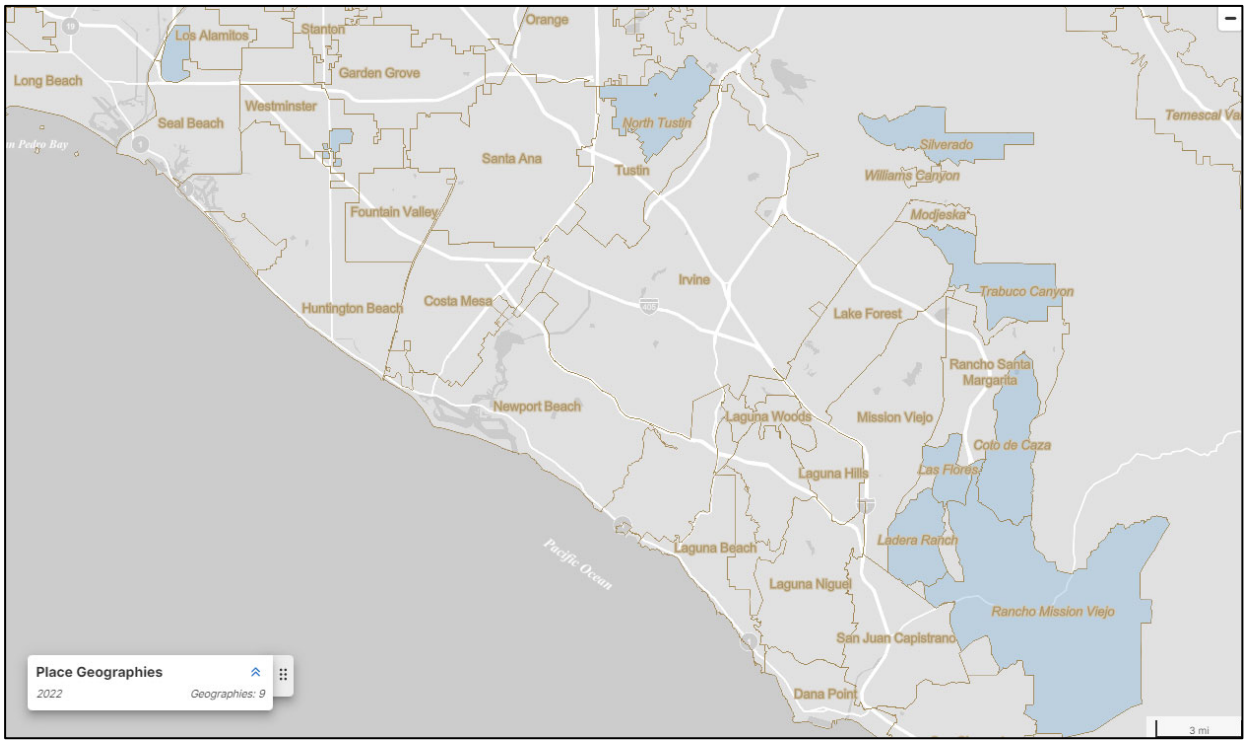
Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).

Figure 4-17
Distribution of RHNA Sites and Racial/Ethnic Minority Population by Tract



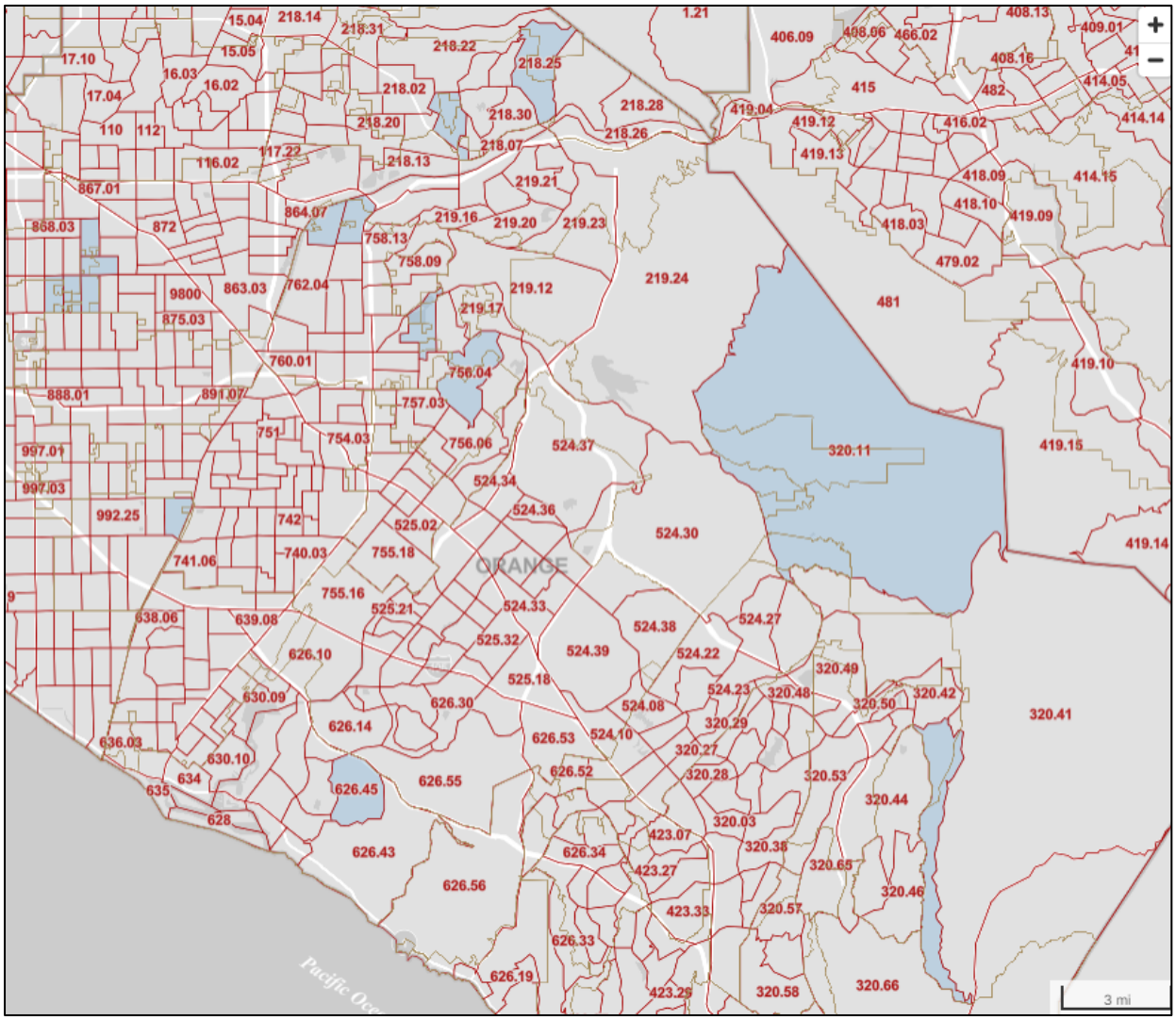
Source: HCD AFFH Data Viewer 2.0 (based on 2019 ACS).

Figure 4-18
Unincorporated CDPs



Source: US Census Bureau, 2022 American Community Survey.

Figure 4-19
Unincorporated Area Tracts



Source: US Census Bureau, 2022 American Community Survey.

Candidate Sites and Persons with Disabilities

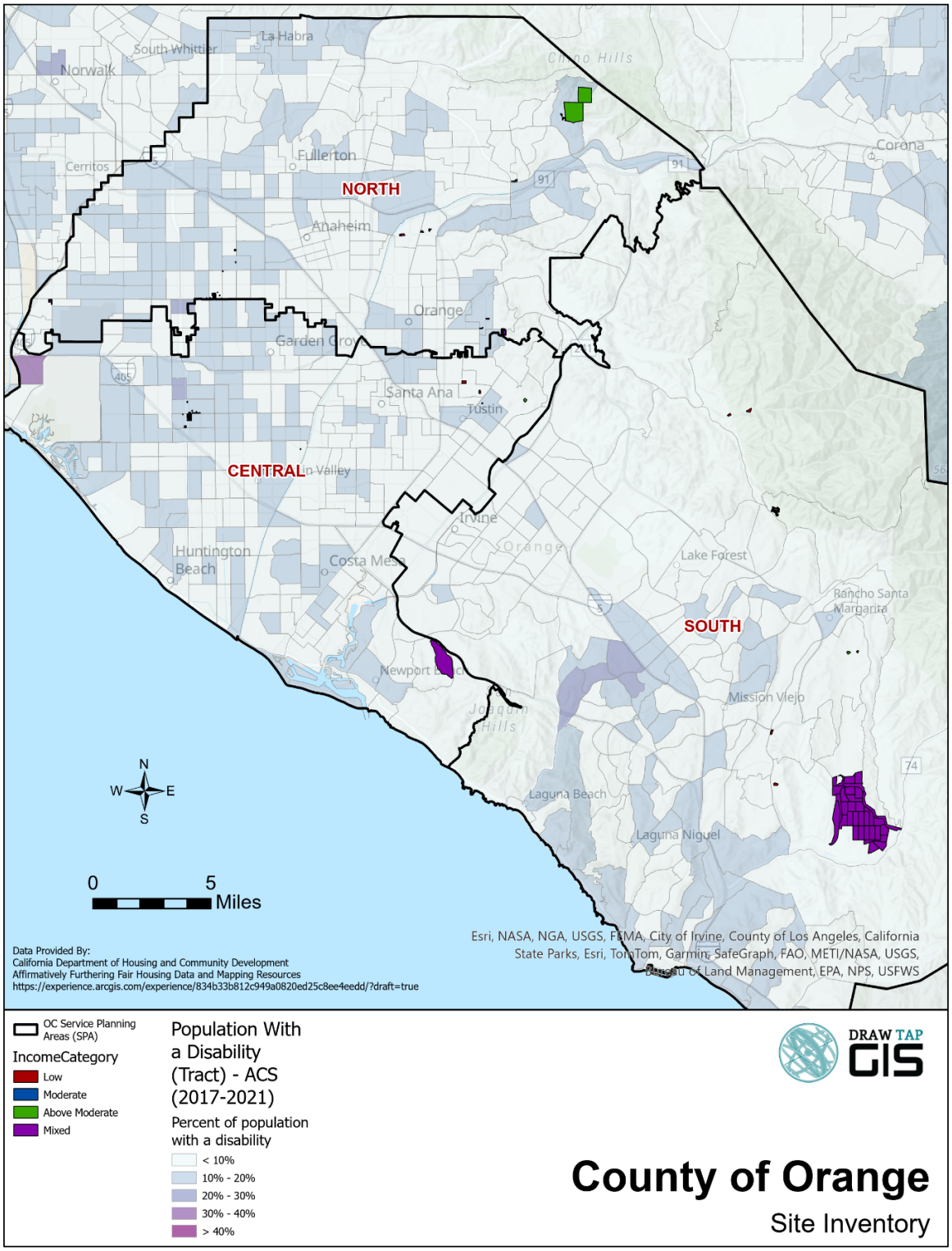
The distribution of RHNA units by populations of persons with disabilities is shown in **Table 4-35** and **Figure 4-20**. Consistent with the countywide trend, there are no RHNA sites located in tracts where more than 20% of the population experiences a disability. Approximately 74% of units are in tracts where less than 10% of the population experiences a disability. The remaining 26% are in tracts where between 10% to 20% of the population experiences a disability. A larger proportion of lower-income RHNA units are in tracts where more than 10% of persons experience a disability (44.3%) compared to moderate-income units (11.3%) and above-moderate-income units (10.5%).

Table 4-35
Sites Inventory by Population of Persons with Disabilities

Persons with Disabilities (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<10%	2774	55.7%	1770	88.7%	3708	89.5%	8252	74.2%
10-20%	2209	44.3%	225	11.3%	434	10.5%	2868	25.8%
20-30%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
30-40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable disabled populations within a single population range (i.e., there are multiple tracts containing RHNA units with disabled populations below 10%. The RHNA units shown are the summation of all units in various Unincorporated tracts with disabled populations in this range).

Figure 4-20
Distribution of RHNA Sites and Persons with Disabilities by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Candidate Sites and Familial Status

The distribution of RHNA units by population of children residing in married couple households is presented in **Table 4-36** and **Figure 4-21**. In general, North and Central Orange County have more tracts with smaller proportions of children in married couple households compared to South Orange County. Nearly all RHNA units are in tracts where more than 60% of children reside in married couple households. Approximately 0.4% of units, totaling 50 units, are in a tract where only 55% of children reside in married couple households. All 50 units located in this tract are allocated towards the lower-income RHNA.

Additionally, more lower-income RHNA units are in tracts where 60% to 80% of children are in married couple households (71.6%) compared to moderate- (22.3%) and above-moderate- (10.5%) income units. The remaining 27.4% of lower-income RHNA units, 77.7% of moderate-income units, and 89.5% of above-moderate-income units are in tracts where more than 80% of children live in married-couple households.

RHNA units and sites are shown by population of children residing in single-parent female-headed households in **Table 4-37** and **Figure 4-22**. Less than 40% of children live in female-headed households in most Orange County tracts. There are no RHNA sites located in tracts where more than 40% of children are in single-parent female-headed households. However, a larger proportion of moderate- (93.4%) and above-moderate- (99.7%) income units are in tracts where less than 20% of children reside in female-headed households compared to lower-income units (65.4%). The remaining 34.6% of lower-income units, 6.6% of moderate-income units, and 0.3% of above-moderate-income units are in tracts where 20% to 40% of children reside in female-headed households.

Table 4-36
Sites Inventory by Children in Married Couple Households

Children in Married Couple Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
40-60%	50	1.0%	0	0.0%	0	0.0%	50	0.4%
60-80%	3567	71.6%	444	22.3%	434	10.5%	4445	40.0%
>80%	1366	27.4%	1551	77.7%	3708	89.5%	6625	59.6%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

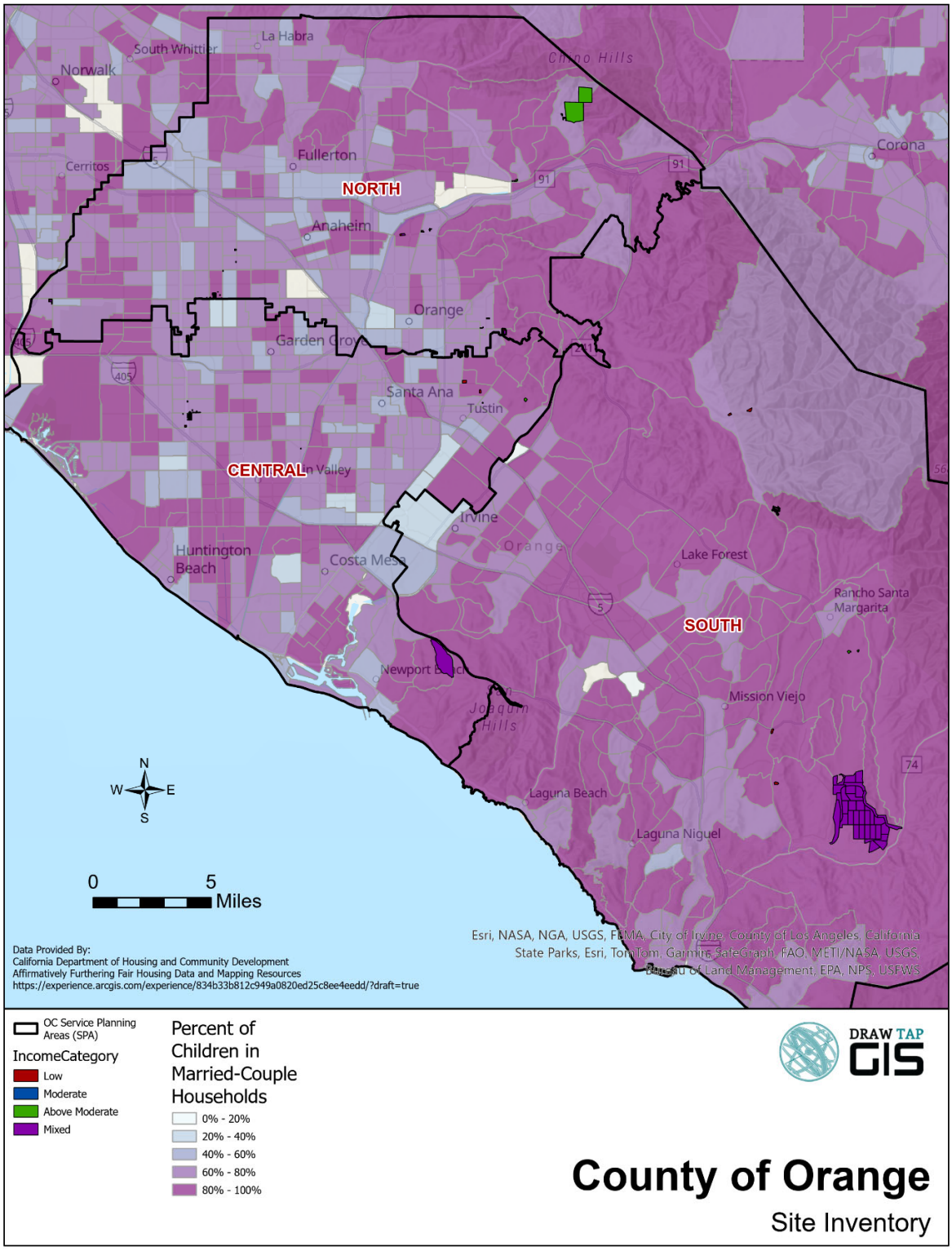
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable populations of children in married couple households within a single population range (i.e., there are multiple tracts containing RHNA units with populations of children in married couple households below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with populations of children in married couple households in this range).

Table 4-37
Sites Inventory by Children in Female-Headed Households

Children in Female-Headed Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	3259	65.4%	1864	93.4%	4128	99.7%	9251	83.2%
20-40%	1724	34.6%	131	6.6%	14	0.3%	1869	16.8%
40-60%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
60-80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

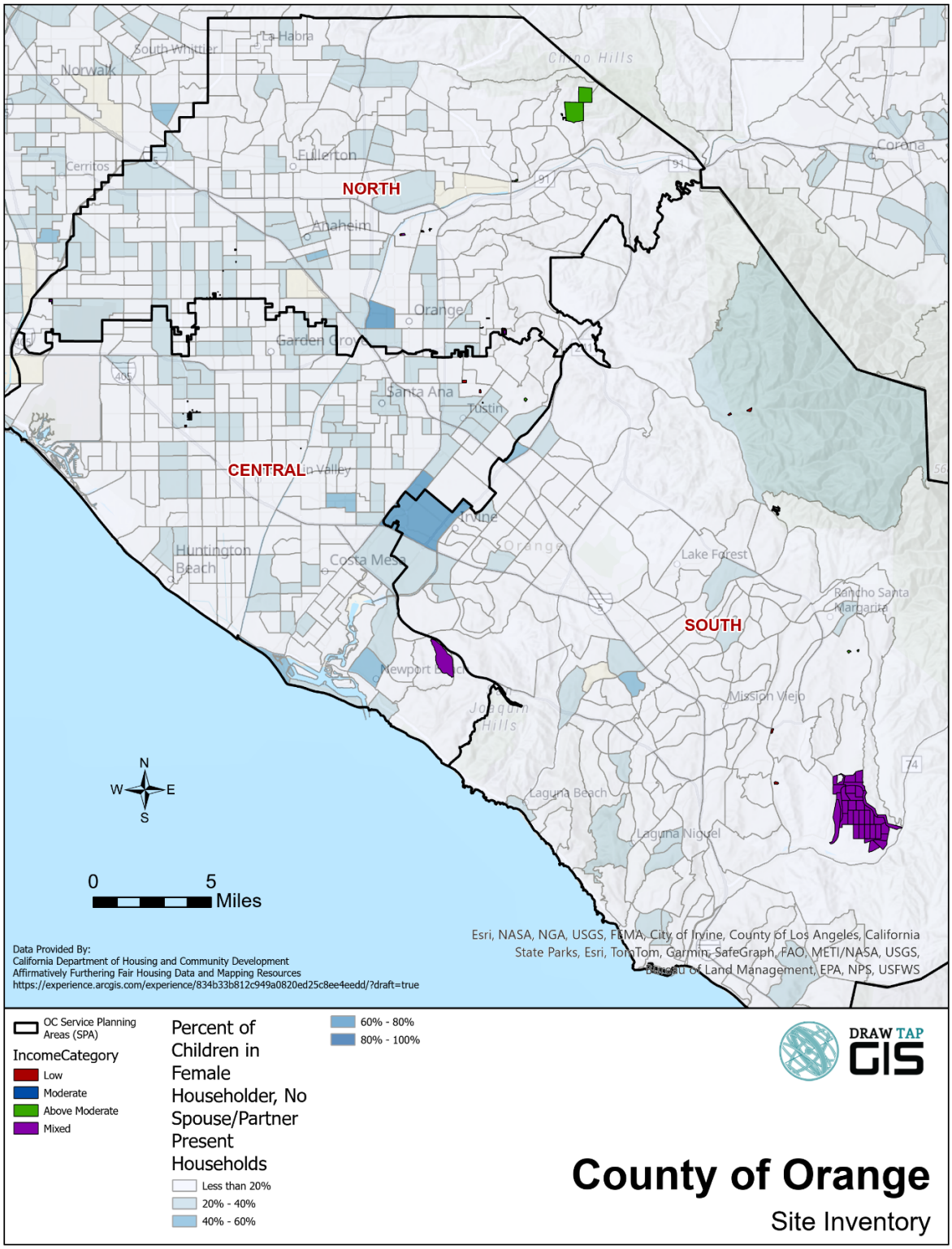
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable populations of children in female-headed households within a single population range (i.e., there are multiple tracts containing RHNA units with populations of children in female-headed households below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with populations of children in female-headed households in this range).

Figure 4-21
Distribution of RHNA Sites and Children in Married Couple Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Figure 4-22
Distribution of RHNA Sites and Children in Female-Headed Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2019 ACS).

Candidate Sites and Low- and Moderate- Income

The distribution of RHNA units by LMI household population is shown in **Table 4-38** and **Figure 4-23**. As shown in **Figure 4-23**, block groups with larger LMI household populations are generally more concentrated in the North and Central Orange County areas. Of the units selected to meet the RHNA, 61.8% are in block groups that are considered LMI areas, where more than 50% of households have low or moderate incomes. A larger proportion of units allocated towards the above-moderate-income RHNA are in LMI areas (72.5%) compared to moderate-income units (65.4%) and lower-income units (51.5%).

Table 4-38
Sites Inventory by Population of LMI Households

LMI Households (Block Group)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<25%	1399	28.1%	476	23.9%	1002	24.2%	2877	25.9%
25-50%	1016	20.4%	215	10.8%	135	3.3%	1366	12.3%
50-75%	2047	41.1%	1179	59.1%	3005	72.5%	6231	56.0%
75-100%	521	10.5%	125	6.3%	0	0.0%	646	5.8%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).
Note: Population is based on the block group-level data where each site is located. Block groups with RHNA sites have LMI household populations within a single population range (i.e., there are multiple block groups containing RHNA units with LMI household populations of below 25%. The RHNA units shown are the summation of all units in various Unincorporated block groups with LMI household populations in this range).

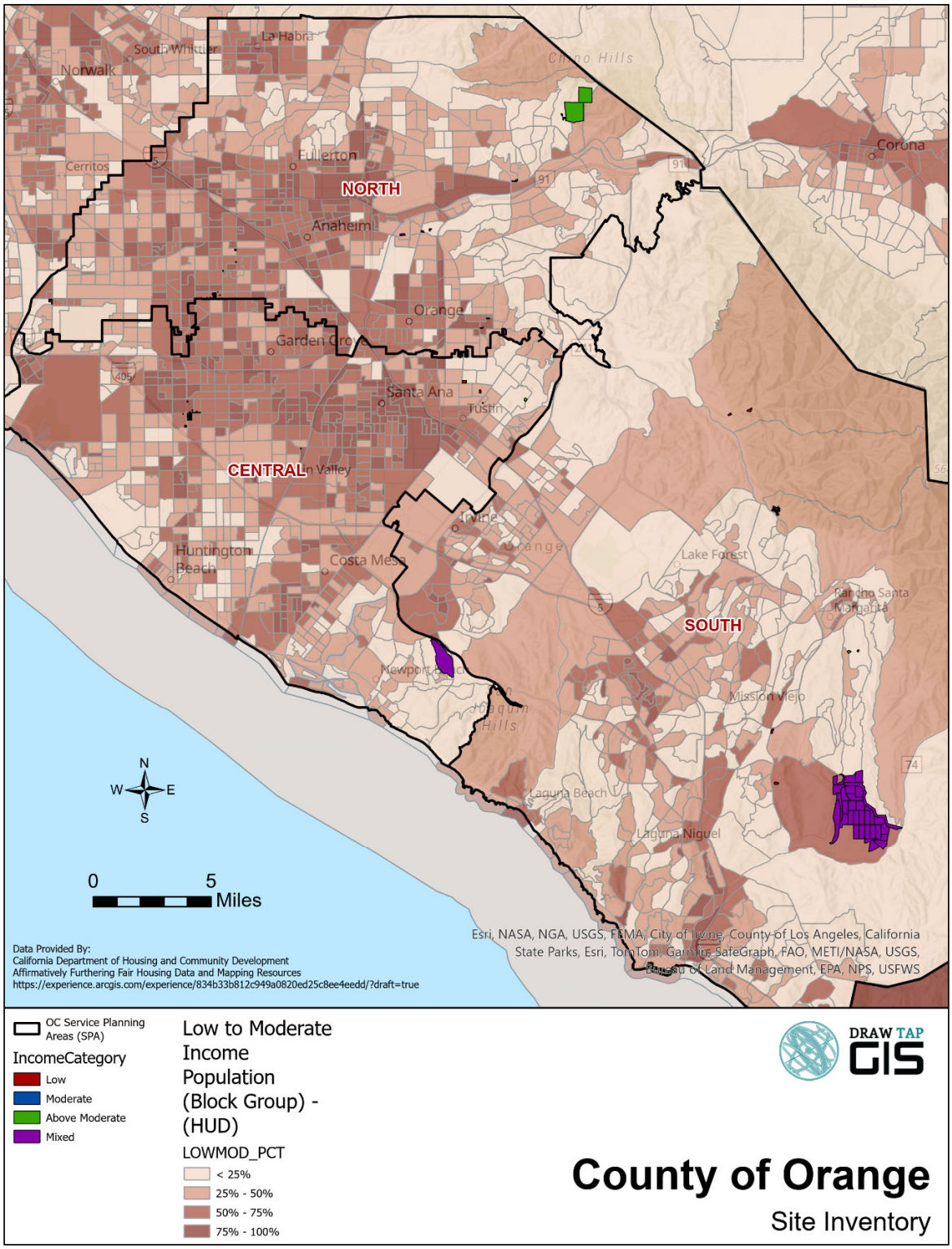
The distribution of RHNA units by CDP or Unincorporated County tract is presented in **Table 4-39**. As discussed above, in the North County, tracts 218.25, 219.13, 756.04, 762.01, and 762.02 have the largest concentrations RHNA units. These tracts have LMI household populations of 17.2%, 79.2%, 9.5%, 49.2%, and 20.6%, respectively. These tracts, with the exception of tract 219.13, generally have lower LMI populations compared to other areas in the North County. Tract 219.13 is located north of the City of Orange. There are 2,043 RHNA units identified in Midway City in the Central County area. Tracts in Unincorporated Midway City have LMI populations ranging from 62% to 83.3%. LMI populations in Unincorporated Midway City are higher than other CDPs/tracts in the Central Unincorporated County area containing RHNA units. Unincorporated Rancho Mission Viejo in the South Unincorporated County area has the largest proportion of RHNA units and an LMI population of 60%.

Table 4-39
Sites Inventory by Population of LMI Households – CDP and Unincorporated Tract

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	% LMI Households
Northern Unincorporated County					
Rossmoor	525	188	0	713	21.7%
Tract 218.16	130	0	44	174	42.6%
Tract 218.25	0	0	420	420	17.2%
Tract 219.13	302	26	0	328	79.2%
Tract 756.04	351	164	0	515	9.5%
Tract 762.01	409	215	0	624	49.2%
Tract 762.02	431	0	0	431	20.6%
Tract 871.01	177	0	0	177	32.1%
Tract 877.01	0	36	0	36	71.0%
Tract 877.03	50	0	0	50	72.7%
Tract 878.05	0	31	0	31	74.5%
Tract 878.06	114	48	0	162	71.8%
Central Unincorporated County					
Midway City	1907	132	4	2043	62.0% - 83.3%
North Tustin	45	0	63	108	20.5% - 44.3%
Tract 626.45	62	124	432	618	6.9%
Tract 992.27	0	31	0	31	79.6%
Southern Unincorporated County					
Coto de Caza	0	0	113	113	7.4% - 24.2%
Ladera Ranch	30	0	0	30	60.0%
Las Flores	60	0	0	60	35.6%
Rancho Mission Viejo	165	1000	3001	4166	60.0%
Silverado	180	0	0	180	46.0%
Trabuco Canyon	0	0	65	65	26.5%
Tract 320.11	45	0	0	45	46.0%

Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).

Figure 4-23
Distribution of RHNA Sites and LMI Household Populations by Block Group



Source: HCD AFFH Data Viewer 2.0 (based on HUD 2011-2015).

Candidate Sites and R/ECAPs

There are a few Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) within the center of Orange County; however, the proposed candidate sites do not fall within any of the identified R/ECAPs and none are located in any Unincorporated County areas. There are also no RHNA units located in any TCAC areas of high segregation and poverty.

Candidate Sites and RCAAs

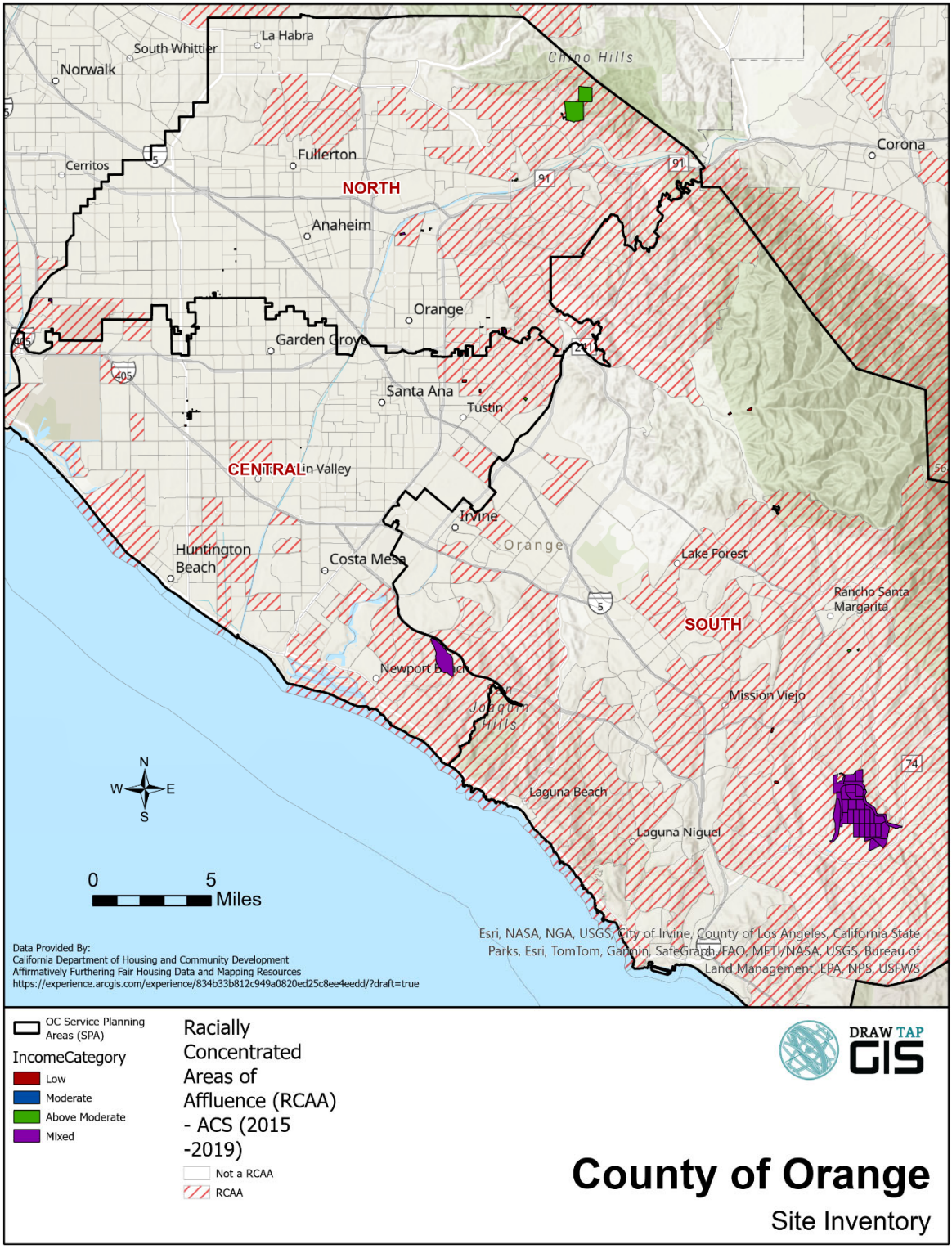
Table 4-40 and **Figure 4-24** show the distribution of units identified to meet the RHNA by RCAAs. As shown in **Figure 4-24**, a large proportion of Orange County, especially South Orange County, is considered an RCAA. Of the units identified to meet the RHNA, 68.4% are in RCAA tracts, including 35.7% of lower-income units, 84.8% of moderate-income units, and 99.9% of above-moderate-income units.

Table 4-40
Sites Inventory by RCAAs

RCAAs (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
RCAA	1777	35.7%	1691	84.8%	4138	99.9%	7606	68.4%
Not an RCAA	3206	64.3%	304	15.2%	4	0.1%	3514	31.6%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on HCD 2019 RCAAs).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified as RCAAs (i.e., there are multiple tracts containing RHNA units that are RCAAs. The RHNA units shown are the summation of all units in various Unincorporated tracts that are RCAAs).

Figure 4-24
Sites Inventory and RCAAs



Source: HCD AFFH Data Viewer 2.0 (based on HCD 2019 RCAAs).

Candidate Sites and TCAC/HCD Opportunity AreasMost of South Orange County, the coastal areas of Central Orange County, and the northern areas of North Orange County are considered the highest resource areas. As shown in **Table 4-41** and **Figure 4-25**, there are no RHNA units in low resource areas or areas of high segregation and poverty. Most RHNA units (64.8%) are in highest resource tracts, followed by high resource tracts (26.1%), and moderate resource tracts (9.1%). A larger proportion of moderate- and above-moderate-income units are in highest resource tracts (74% and 99.9%, respectively), compared to lower-income units (32%). Conversely, a larger proportion of units identified to meet the lower-income RHNA are in moderate resource tracts (16%) compared to moderate-income units (10.7%) and above-moderate-income units (0%).

Table 4-41
Sites Inventory by TCAC Opportunity Area

TCAC Opportunity Area Category (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
Highest Resource	1593	32.0%	1476	74.0%	4138	99.9%	7207	64.8%
High Resource	2591	52.0%	305	15.3%	4	0.1%	2900	26.1%
Moderate Resource	799	16.0%	214	10.7%	0	0.0%	1013	9.1%
Low Resource	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Area of High Segregation and Poverty	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified by a TCAC opportunity area category (i.e., there are multiple tracts containing RHNA units that are Highest Resource Areas. The RHNA units shown are the summation of all units in various Unincorporated tracts that are Highest Resource Areas).

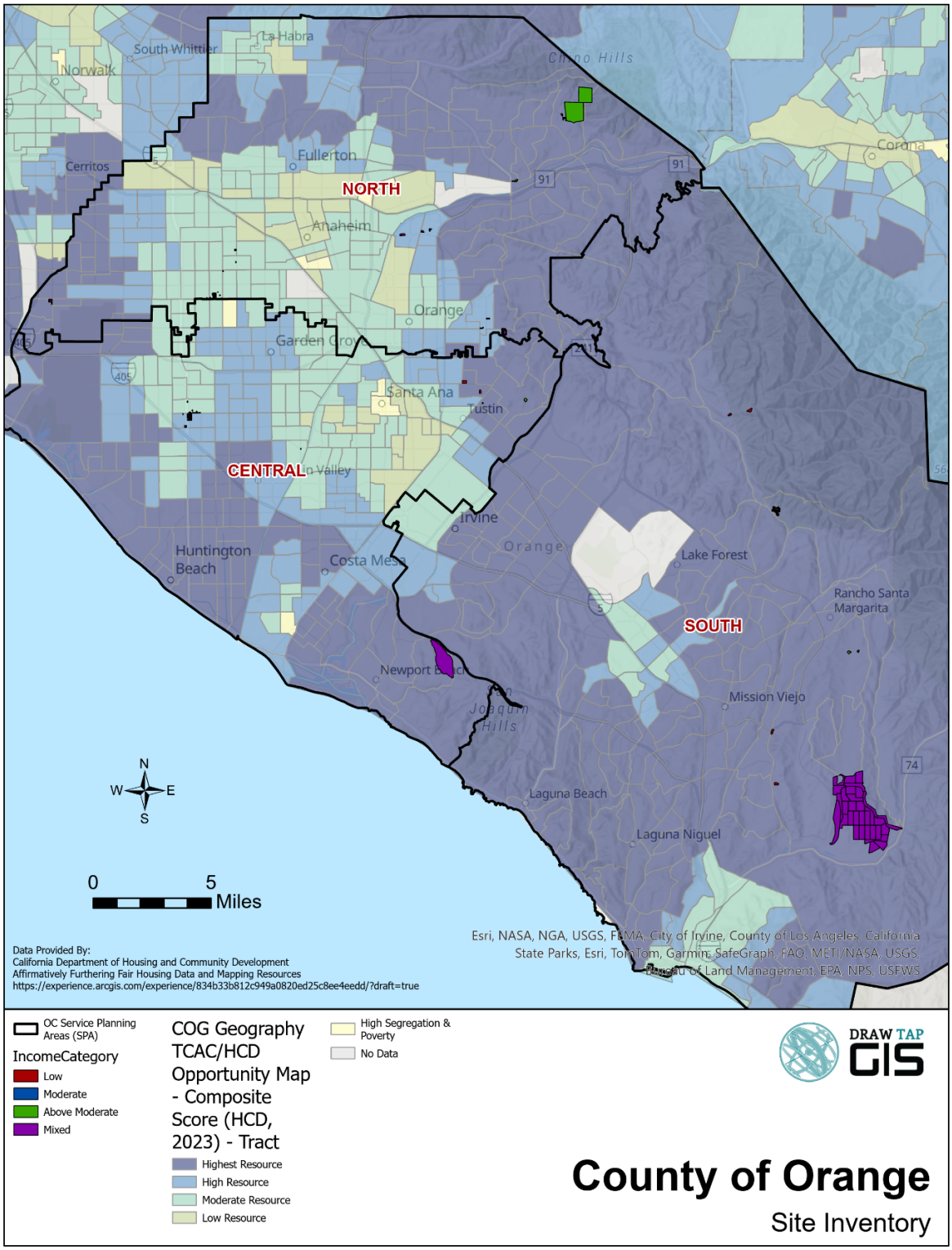
The distribution of RHNA units by TCAC Opportunity Area and CDP/tract is presented in **Table 4-42**. In the North County, opportunities to accommodate more than 500 RHNA units have been identified in Rossmoor, tract 756.04, and tract 762.01. These are all highest or high resource areas. Only 456 of the total 2,800 RHNA units in the North County (16.3%) are in moderate resource areas. There are no RHNA units in the North County in low resource areas or areas of high segregation and poverty. There are also no RHNA units in low resource areas or areas of high segregation and poverty in the Central or South County areas. Sites accommodating 2,043 units have been identified in Midway City (Central County), which is comprised of moderate and high resource tracts. In the South County, all RHNA units are in highest resource areas.

Table 4-42
Sites Inventory by TCAC Opportunity Area – CDPs and Unincorporated Tracts

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate-Income Units	Total RHNA Units	TCAC Opportunity Area
Northern Unincorporated County					
Rossmoor	525	188	0	713	Highest Resource
Tract 218.16	130	0	44	174	Highest Resource
Tract 218.25	0	0	420	420	Highest Resource
Tract 219.13	302	26	0	328	High Resource
Tract 756.04	351	164	0	515	Highest Resource
Tract 762.01	409	215	0	624	High Resource
Tract 762.02	431	0	0	431	High Resource
Tract 871.01	177	0	0	177	Moderate Resource
Tract 877.01	0	36	0	36	Moderate Resource
Tract 877.03	50	0	0	50	Moderate Resource
Tract 878.05	0	31	0	31	Moderate Resource
Tract 878.06	114	48	0	162	Moderate Resource
Central Unincorporated County					
Midway City	1907	132	4	2043	Moderate/High Resource
North Tustin	45	0	63	108	Highest Resource
Tract 626.45	62	124	432	618	Highest Resource
Tract 992.27	0	31	0	31	Moderate Resource
Southern Unincorporated County					
Coto de Caza	0	0	113	113	Highest Resource
Ladera Ranch	30	0	0	30	Highest Resource
Las Flores	60	0	0	60	Highest Resource
Rancho Mission Viejo	165	1000	3001	4166	Highest Resource
Silverado	180	0	0	180	Highest Resource
Trabuco Canyon	0	0	65	65	Highest Resource
Tract 320.11	45	0	0	45	Highest Resource

Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).

Figure 4-25
Distribution of RHNA Sites and TCAC Opportunity Area by Tract



Source: HCD AFFH Data Viewer 2.0 (based on TCAC/HCD Opportunity Map, 2023).

Candidate Sites and CalEnviroScreen

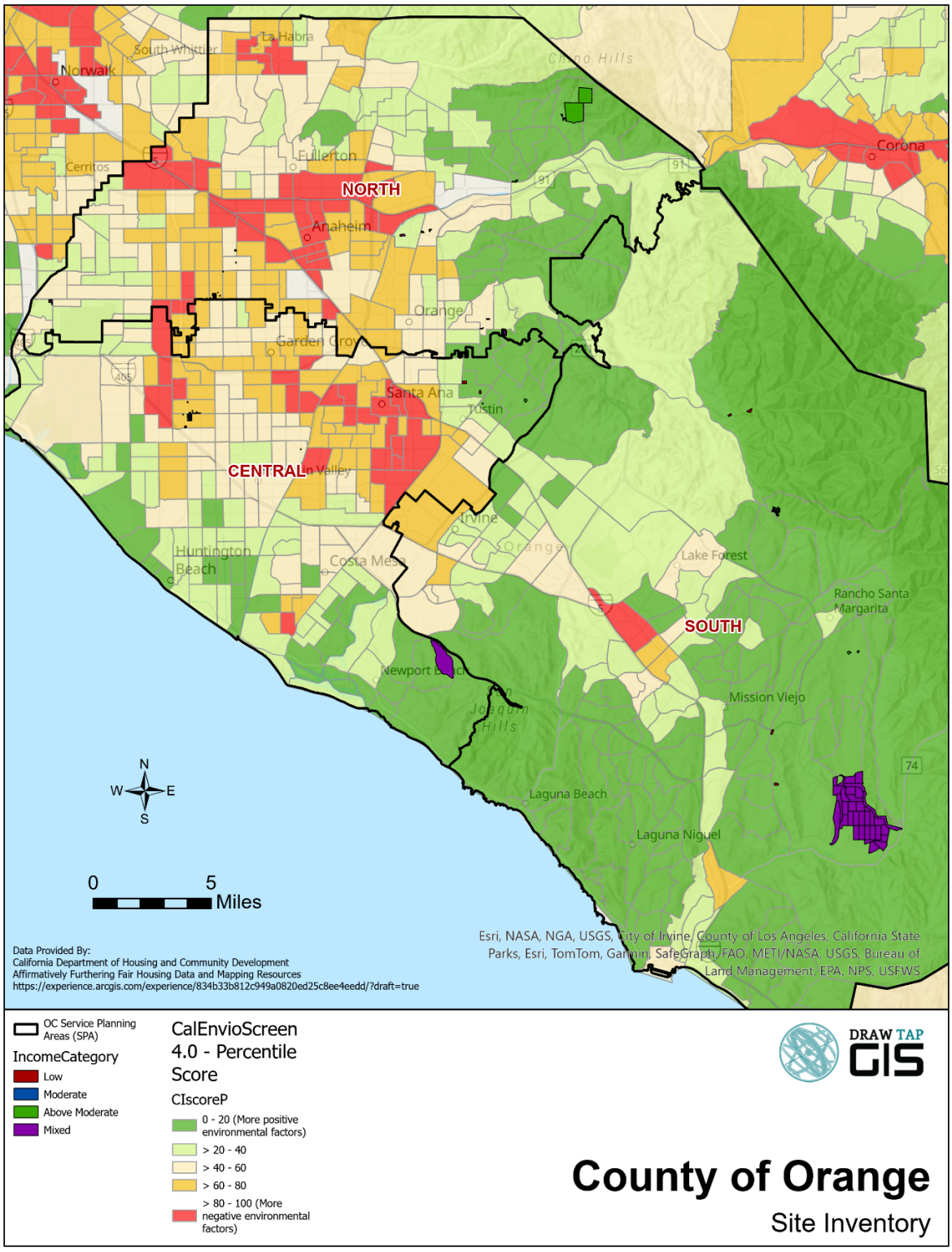
CalEnviroScreen 4.0 percentile scores by tract and the sites selected to meet the RHNA are presented in **Table 4-43** and **Figure 4-26**. South Orange County generally has superior environmental outcomes based on CalEnviroScreen 4.0 score compared to the Central and North areas. Of all units identified to meet the RHNA, 58.4% scored in the 20th percentile or lower (best scores), 12% scored in the 20th to 40th percentile range, 9% scored in the 40th to 60th percentile range, and 20.6% scored in the 60th to 80th percentile range. There are no RHNA units located in tracts scoring in the 80th percentile or above (worst scores). However, a larger proportion of lower-income units (41.6%) are in tracts scoring in the 60th percentile or higher compared to moderate- (10.6%) and above-moderate- (0.1%) units. Nearly all units identified to meet the above-moderate-income RHNA scored within the 20th percentile range (best scores) compared to only 21.4% of lower-income units and 64.6% of moderate-income units.

Table 4-43
Sites Inventory by CalEnviroScreen Percentile Score

CalEnviroScreen Percentile Score (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
0-20	1068	21.4%	1288	64.6%	4138	99.9%	6494	58.4%
20-40	934	18.7%	403	20.2%	0	0.0%	1337	12.0%
40-60	910	18.3%	93	4.7%	0	0.0%	1003	9.0%
60-80	2071	41.6%	211	10.6%	4	0.1%	2286	20.6%
80-100	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on OEHHA CalEnviroScreen, 2021).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable CalEnviroScreen scores within a single score range (i.e., there are multiple tracts containing RHNA units with CalEnviroScreen scores below 20. The RHNA units shown are the summation of all units in various Unincorporated tracts with CalEnviroScreen scores in this range).

Figure 4-26
Distribution of RHNA Sites and CalEnviroScreen Score by Tract



Source: HCD AFFH Data Viewer 2.0 (based on OEHHA CalEnviroScreen, 2021).

Candidate Sites and Cost Burden

Overpayment by homeowners by tract and the sites inventory are shown in **Table 4-44** and **Figure 4-27**. There are no RHNA units located in tracts where more than 60% of owners are cost burdened. The largest proportion of RHNA units (84.2%) are in tracts where between 20% and 40% of owners are cost burdened. There are more lower-income RHNA units (24%) in tracts where between 40% and 60% of owners are cost burdened compared to moderate- (15.6%) and above-moderate-income units (1.8%). However, an additional 177 lower-income units (3.6% of all lower-income units) are in tracts where less than 20% of owners are cost burdened. There are no moderate- or above-moderate-income units in tracts with populations of cost burdened owners in this range.

The sites inventory and burdened renter households are presented in **Table 4-45** and **Figure 4-28**. In general, cost burdened renters are more prevalent in tracts in North and Central Orange County compared to South Orange County. Nearly half of RHNA units (44.9%) are in tracts where between 60% and 80% of renters overpay for housing. A smaller proportion of lower-income units are in tracts with populations of cost burdened renters in this range (14.2%) compared to moderate-income units (64.1%) and above-moderate-income units (72.5%). Another 36.5% of RHNA units are in tracts where 40% to 60% of renters are cost burdened and 17.8% are in tracts where 20% to 40% of renters are cost burdened. There are an additional 102 above- moderate-income units in tracts where less than 20% of renters overpay for housing. There are no RHNA units are tracts where more than 80% of renters are cost burdened.

Table 4-44
Sites Inventory by Cost Burdened Owners

Cost Burdened Owners (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	177	3.6%	0	0.0%	0	0.0%	177	1.6%
20-40%	3608	72.4%	1684	84.4%	4067	98.2%	9359	84.2%
40-60%	1198	24.0%	311	15.6%	75	1.8%	1584	14.2%
60-80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

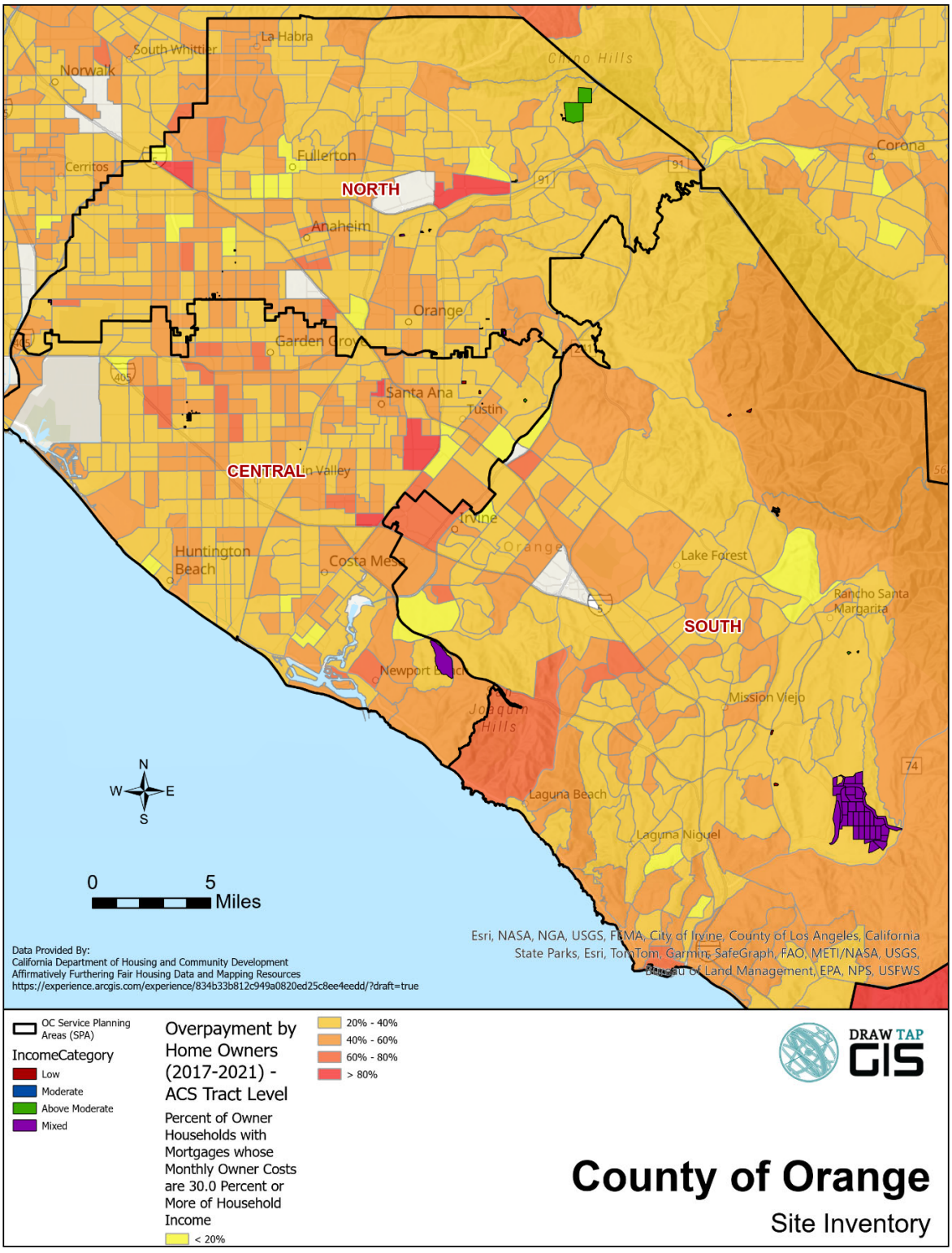
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable cost burdened owner populations within a single population range (i.e., there are multiple tracts containing RHNA units with cost burdened owner populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with cost burdened owner populations in this range).

Table 4-45
Sites Inventory by Cost Burdened Renters

Cost Burdened Renters (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	102	2.5%	102	0.9%
20-40%	1047	21.0%	312	15.6%	615	14.8%	1974	17.8%
40-60%	3226	64.7%	404	20.3%	424	10.2%	4054	36.5%
60-80%	710	14.2%	1279	64.1%	3001	72.5%	4990	44.9%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

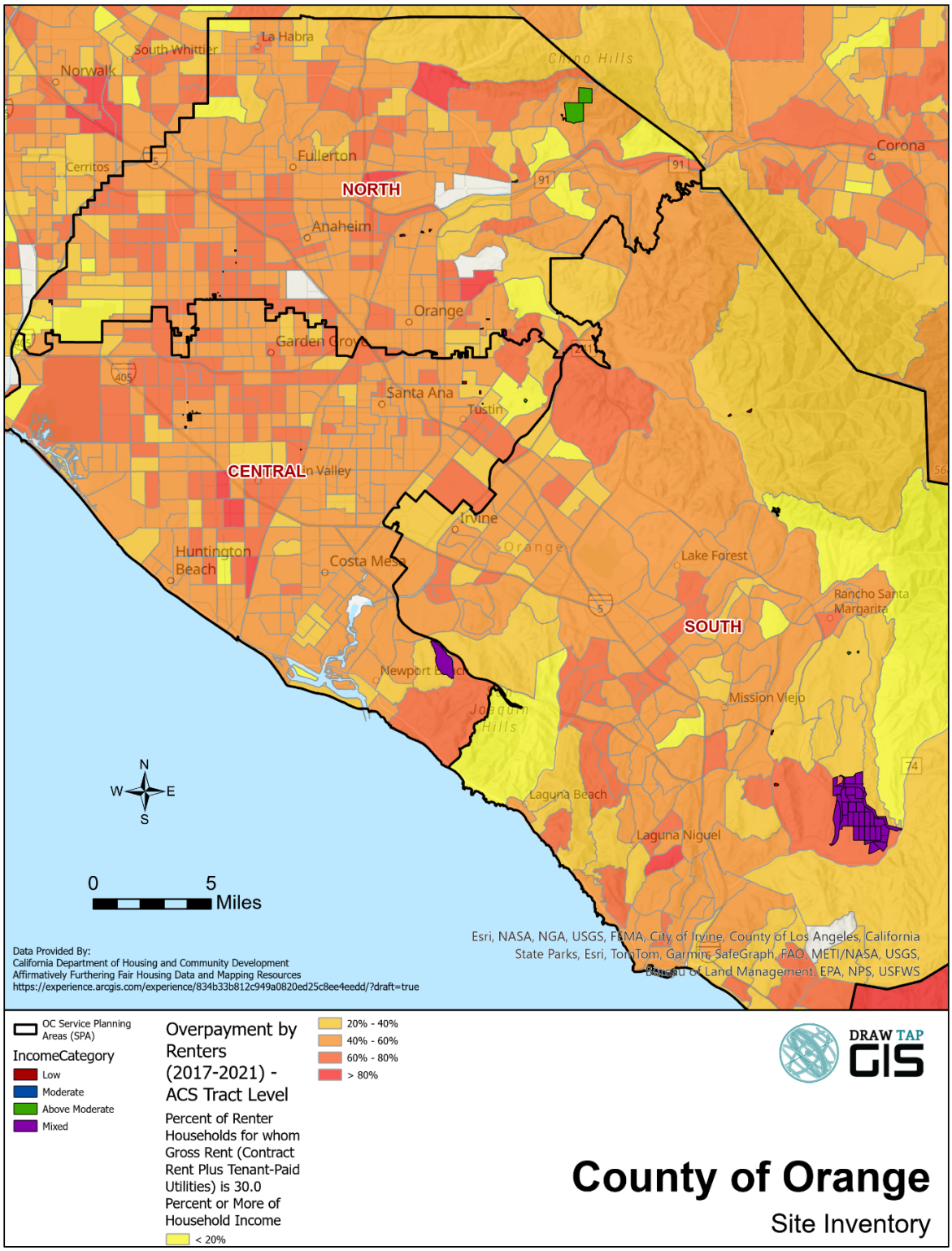
Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable cost burdened renter populations within a single population range (i.e., there are multiple tracts containing RHNA units with cost burdened renter populations below 20%. The RHNA units shown are the summation of all units in various Unincorporated tracts with cost burdened renter populations in this range).

Figure 4-27
Distribution of RHNA Sites and Cost Burdened Owners by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Figure 4-28
Distribution of RHNA Sites and Cost Burdened Renters by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Candidate Sites and Overcrowding

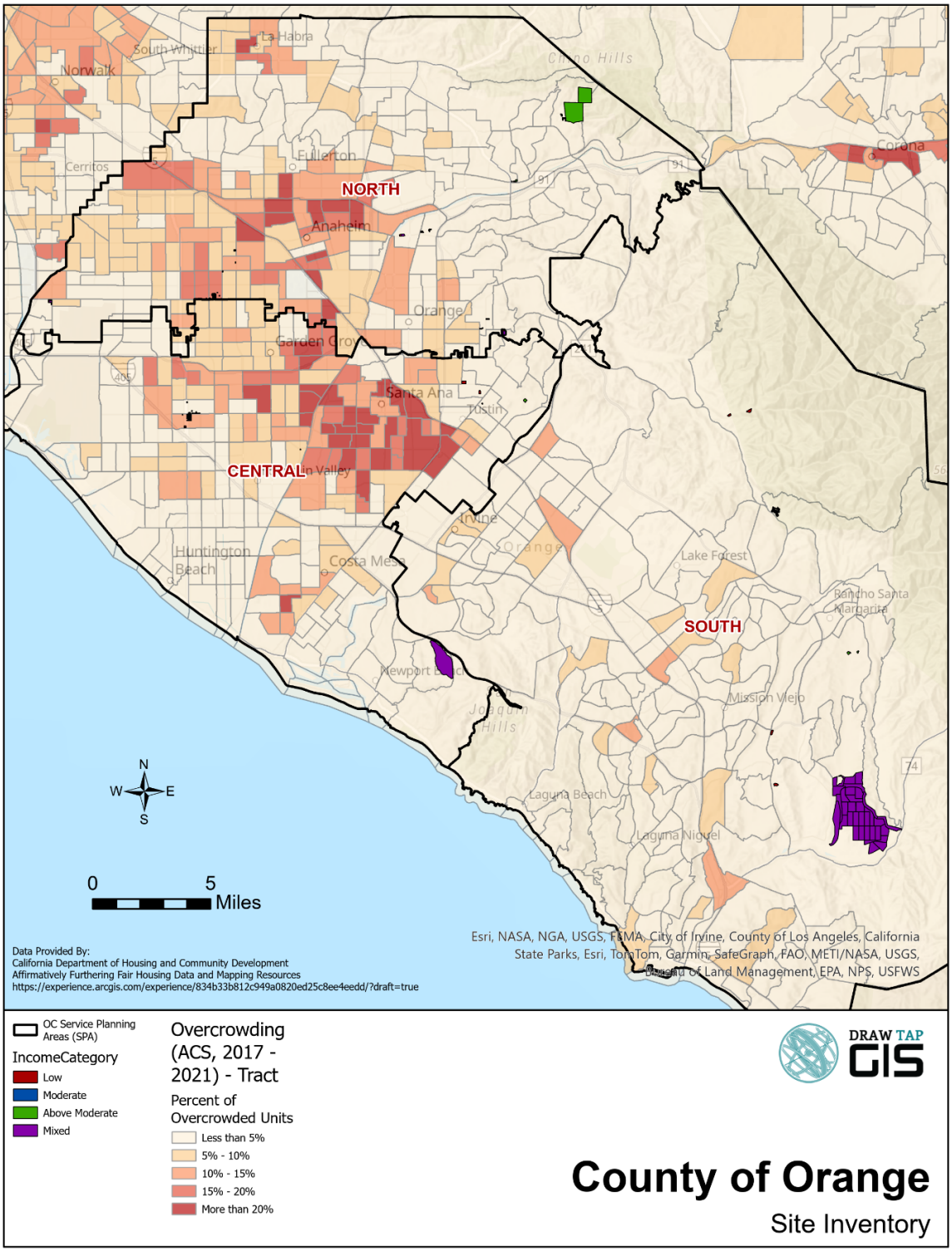
In general, overcrowding is more prevalent in the North and Central County areas (see **Figure 4-29**). As shown in **Table 4-46**, most RHNA units (82%) are in tracts where less than 5% of households experience overcrowding. However, a larger proportion of moderate- (89.5%) and above-moderate- (99.9%) income units are in tracts with populations of overcrowded households in this range. In comparison, 64.1% of lower-income units are in tracts where less than 5% of households are overcrowded, 4.6% where 5% to 10% of households are overcrowded, 29.1% where 10% to 15% of households are overcrowded, and 2.3% where 15% to 20% of households are overcrowded. There are no RHNA units of any income level in tracts where more than 20% of households are overcrowded.

Table 4-46
Sites Inventory by Overcrowded Households

Overcrowded Households (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<5%	3193	64.1%	1785	89.5%	4138	99.9%	9116	82.0%
5-10%	227	4.6%	31	1.6%	0	0.0%	258	2.3%
10-15%	1449	29.1%	100	5.0%	4	0.1%	1553	14.0%
15-20%	114	2.3%	79	4.0%	0	0.0%	193	1.7%
>20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites have variable overcrowded populations within a single population range (i.e., there are multiple tracts containing RHNA units with overcrowded populations below 5%. The RHNA units shown are the summation of all units in various Unincorporated tracts with overcrowded populations in this range).

Figure 4-29
Distribution of RHNA Sites and Overcrowded Households by Tract



Source: HCD AFFH Data Viewer 2.0 (based on 2017-2021 ACS).

Candidate Sites and Sensitive Communities At Risk of Displacement

As shown in **Figure 4-30**, tracts that are considered communities at risk of displacement are more populated in the North and Central County areas. The distribution of RHNA units by displacement risk is shown in **Table 4-47**. Most RHNA units (74.3%) are in tracts that are not considered vulnerable communities. However, more than half (51.2%) of RHNA units identified to meet the lower-income RHNA are in vulnerable communities compared to only 15.2% of moderate-income units and 0.1% of above-moderate-income units.

Table 4-47
Sites Inventory by Displacement Risk

Vulnerable Population (Tract)	Lower		Moderate		Above Moderate		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
At Risk of Displacement	2550	51.2%	304	15.2%	4	0.1%	2858	25.7%
Not At Risk of Displacement	2433	48.8%	1691	84.8%	4138	99.9%	8262	74.3%
Total	**4983**	**100.0%**	**1995**	**100.0%**	**4142**	**100.0%**	**11120**	**100.0%**

Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).
Note: Population is based on the tract-level data where each site is located. Tracts with RHNA sites are identified as communities at risk of displacement (i.e., there are multiple tracts containing RHNA units that are considered communities at risk of displacement. The RHNA units shown are the summation of all units in various Unincorporated tracts that are considered communities at risk of displacement).

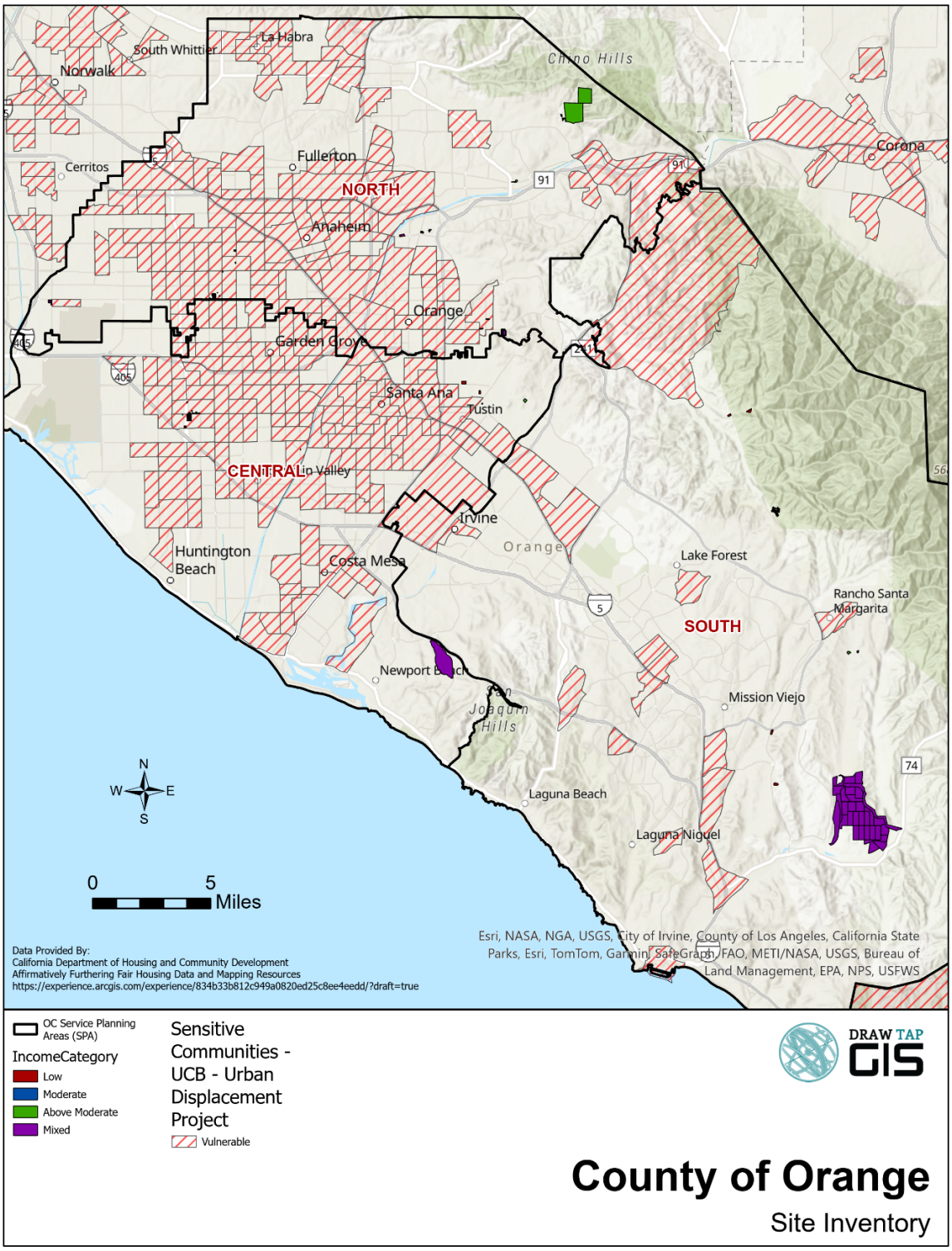
The sites inventory by Unincorporated CDP or tract is presented in **Table 4-48**. Of the tracts in North County where more than 500 RHNA units have been allocated, Rossmoor, tract 756.04, and tract 762.01, only tract 756.04 is considered a vulnerable community. In the North County, approximately 35.5% of RHNA units are in tracts that are considered vulnerable communities. In the Central County area, Midway City and tract 992.27 are considered vulnerable while North Tustin and tract 626.45 are not. In the Central County, 74.1% of RHNA units are in vulnerable communities. None of the Unincorporated County areas in the South are considered at risk of displacement.

Table 4-48
Sites Inventory by Displacement Risk – CDPs and Unincorporated Tracts

Unincorporated Area	Lower-Income Units	Moderate-Income Units	Above-Moderate Income Units	Total RHNA Units	Vulnerable Community?
Northern Unincorporated County					
Rossmoor	525	188	0	713	No
Tract 218.16	130	0	44	174	No
Tract 218.25	0	0	420	420	No
Tract 219.13	302	26	0	328	Yes
Tract 756.04	351	164	0	515	Yes
Tract 762.01	409	215	0	624	No
Tract 762.02	431	0	0	431	No
Tract 871.01	177	0	0	177	Yes
Tract 877.01	0	36	0	36	Yes
Tract 877.03	50	0	0	50	Yes
Tract 878.05	0	31	0	31	Yes
Tract 878.06	114	48	0	162	Yes
Central Unincorporated County					
Midway City	1907	132	4	2043	Yes
North Tustin	45	0	63	108	No
Tract 626.45	62	124	432	618	No
Tract 992.27	0	31	0	31	Yes
Southern Unincorporated County					
Coto de Caza	0	0	113	113	No
Ladera Ranch	30	0	0	30	No
Las Flores	60	0	0	60	No
Rancho Mission Viejo	165	1000	3001	4166	No
Silverado	180	0	0	180	No
Trabuco Canyon	0	0	65	65	No
Tract 320.11	45	0	0	45	No

Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).

Figure 4-30
Distribution of RHNA Sites and Displacement Risk by Tract



Source: HCD AFFH Data Viewer 2.0 (based on UCB Urban Displacement Project 2022).

Candidate Sites and AFFH Summary

This summary of candidate sites and AFFH variables will be described in subsections on the North, Central, and South County. The sites inventory and AFFH variables are presented in the table below. The sites inventory is also shown in **Figure 4-31.**

North Orange County. North Orange County is generally characterized by larger protected populations and reduced access to opportunities compared to the South County and parts of the Central County. A total of 3,661 RHNA units have been allocated in North Orange County, making up approximately a third (32.9%) of the total units identified countywide, consistent with the representation of North Orange County in this analysis (one third of the County). Of the 3,661 units, 2,489 are lower-income units (68%), 708 are moderate-income units (19.3%), and 464 are above-moderate-income units (12.7%).

Compared to the Central and South County areas, the North County has more moderate resource areas. However, nearly half (49.8%) of units identified in the North County are in the highest resource areas, followed by high resource areas (37.8%) and low resource areas (12.5%). It is relevant to note that 100% of above- moderate-income units in the North County are in highest resource areas compared to only 40.4% of low-income units and 49.7% of moderate-income units. Similarly, only 21.4% of RHNA units in North Orange County are in vulnerable communities at risk of displacement, but none of these units are allocated towards the above-moderate-income RHNA. Approximately 26% of lower-income units and 20% of above-moderate-income units are in sensitive communities at risk of displacement.

While the North County tends to face more issues related to fair housing compared to the Central and South County areas, actions outlined in this Housing Element aim to mitigate fair housing issues and increase access to economic, environmental, and housing opportunities in this area. Additionally, units identified to meet the RHNA are in North County tracts of variable TCAC allocations (moderate, high, highest), none of which are low resource areas. The distribution of RHNA sites in moderate and high/highest resource areas promotes more housing opportunities in moderate resource areas where there may be higher needs, while also increasing housing mobility by providing new housing opportunities in high resource areas. Further, though a larger proportion of tracts in the North County are considered LMI areas (where more than 50% of households have low or moderate incomes), most RHNA units in the North County area, including 81% of lower-income units, are not in LMI areas, ensuring new affordable housing does not exacerbate existing fair housing issues.

Central Orange County. Demographics trends in Central Orange County are the most variable of the three County subsections. In the central areas, trends tend to mimic those seen in the North County, while coastal areas tend to be more affluent with better access to opportunities. A total of 2,800 RHNA units have been identified in the Central County, including 2,014 lower-income

units (71.9%), 287 moderate-income units (10.3%), and 499 above-moderate-income units (17.8%). RHNA units in Central Orange County represent about 25% of the total sites inventory.

Most tracts in the Central County area with RHNA sites are highest or high resource areas. Of all RHNA units identified in the Central County, 25.9% are in highest resource areas, 54.2% are in high-resource areas, and 19.9% are in moderate resource areas. Nearly all (99.2%) above-moderate-income units are in highest resource areas. A larger proportion of low- (22.7%) and moderate- (34.5%) are in moderate resource areas compared to above-moderate-income units (0%). About 26% of units are in RCAAs including 5.3% of lower-income units, 43.2% of moderate-income units, and 99.2% of above-moderate-income units. Midway City is comprised of one moderate and one high resource area. Neither tract is an RCAA, but both are considered vulnerable communities. A total of 2,043 units (1,907 lower-income, 132 moderate-income, and 4 above-moderate-income) are in Midway City. North Tustin is comprised of all highest resource areas, all of which are RCAAs. None of the tracts in North Tustin with RHNA units are considered sensitive communities at risk of displacement. There are opportunities identified in North Tustin to accommodate 108 units (45 lower-income and 63 above-moderate-income).

South Orange County. South Orange County generally has higher incomes, smaller non-White populations, and higher access to opportunities compared to the Central and North County. Sites with a capacity to accommodate 4,659 units (480 lower-income, 1,000 moderate-income, and 3,179 above-moderate-income).

All communities in South Orange County where RHNA sites have been identified are considered highest resource areas. Opportunities to accommodate lower-income units have been identified in Ladera Ranch, Las Flores, Rancho Mission Viejo, and Silverado. Coto de Caza, Ladera Ranch, Las Flores, Rancho Mission Viejo, and Trabuco Canyon are all considered RCAAs. None of the tracts with RHNA sites in the South County are sensitive communities at risk of displacement.

Table 4-49
Candidate Sites and AFFH Summary

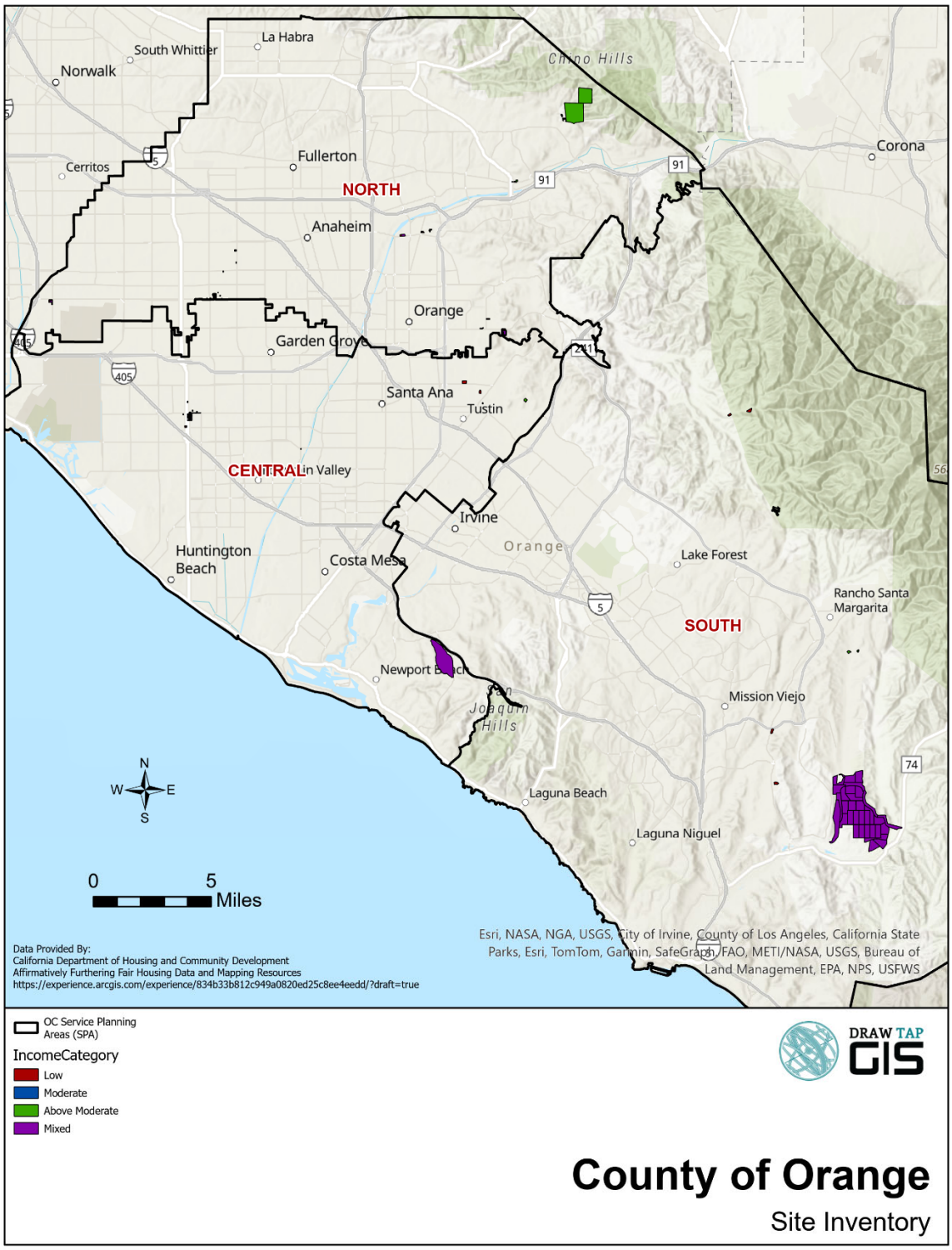
Area/Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			% Non-White	% LMI[1]	RCAA?	TCAC Opp. Cat.	At Risk of Displace-ment?
			Lower	Moderate	Above Moderate					
North County										
Rossmoor (1100.06)	1151	713	525	188	0	36.4%	21.7%	Yes	Highest	No
218.16	1929	174	130	0	44	34.2%	42.6%	Yes	Highest	No
218.25	1104	420	0	0	420	41.0%	17.2%	Yes	Highest	No
219.13	1971	328	302	26	0	76.1%	79.2%	No	High	Yes
756.04	2695	515	351	164	0	30.3%	9.5%	Yes	Highest	No
762.01	2639	624	409	215	0	55.6%	49.2%	Yes	High	No
762.02	1870	431	431	0	0	57.4%	20.6%	No	High	No
871.01	1653	177	177	0	0	74.7%	32.1%	No	Moderate	Yes
877.01	1556	36	0	36	0	74.0%	71.0%	No	Moderate	Yes
877.03	1670	50	50	0	0	81.2%	72.7%	No	Moderate	Yes
878.05	1755	31	0	31	0	82.5%	74.5%	No	Moderate	Yes
878.06	1606	162	114	48	0	86.0%	71.8%	No	Moderate	Yes
Subtotal		**3,661**	**2,489**	**708**	**464**					
Central County										
Midway City (997.01)	1909	526	458	68	0	87.3%	62.0%	No	Moderate	Yes
Midway City (997.02)	2465	1517	1449	64	4	76.5%	83.3%	No	High	Yes
North Tustin (756.03)	1437	10	0	0	10	30.0%	44.3%	Yes	Highest	No
North Tustin (756.05)	2080	16	0	0	16	36.2%	34.5%	Yes	Highest	No
North Tustin (756.06)	2111	37	0	0	37	33.4%	20.5%	Yes	Highest	No
North Tustin (757.02)	1138	45	45	0	0	31.9%	20.6% - 40.8%	Yes	Highest	No
626.45	2622	618	62	124	432	25.2%	6.9%	Yes	Highest	No
992.27	1882	31	0	31	0	74.3%	79.6%	No	Moderate	Yes
Subtotal		**2,800**	**2,014**	**287**	**499**					
South County										
Coto de Caza (320.44)	1951	113	0	0	113	21.5%	24.2%	Yes	Highest	No
Ladera Ranch (320.66)	2577	30	30	0	0	37.5%	60.0%	Yes	Highest	No
Las Flores (320.65)	1685	60	60	0	0	37.5%	35.6%	Yes	Highest	No
Rancho Mission Viejo (320.66)	2577	4166	165	1000	3001	37.5%	60.0%	Yes	Highest	No
Silverado (320.11)	672	180	180	0	0	21.8%	46.0%	No	Highest	No
Trabuco Canyon (320.41)	372	65	0	0	65	28.9%	26.5%	Yes	Highest	No

Table 4-49
Candidate Sites and AFFH Summary

Area/Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			% Non-White	% LMI[1]	RCAA?	TCAC Opp. Cat.	At Risk of Displace-ment?
			Lower	Moderate	Above Moderate					
320.11	672	45	45	0	0	21.8%	46.0%	No	Highest	No
Subtotal		**4,659**	**480**	**1,000**	**3,179**					

Note 1: LMI households are calculated at the block group level. Therefore, one tract may contain multiple block groups.
Source: HCD AFFH Data Viewer 2.0.

Figure 4-31
Sites Inventory Locations



Source: Orange County Sites Inventory, 2024.

Summary of Fair Housing Issues/Assessment of Contributing Factors to Fair Housing

Orange County AI

As identified by the Orange County AI and the above analysis, Orange County experiences the following local contributing factors to fair housing:

Cost burden and severe cost burden and overcrowding are issues for all income categories of the populations in the Unincorporated County areas and across all racial and ethnic groups. The Hispanic and Black communities facing more acute housing problems (including affordability) than other racial and ethnic communities. Based on the data, affordability is a serious issue for residents in Unincorporated County areas as with all residents in the State. Contributing factors may include the relative lack of multifamily housing units, the increased population (though the population of Unincorporated County areas has decreased as areas of the Unincorporated County areas have been annexed) and the lack of significant numbers of new affordable housing units being built.

While 7.8% of Unincorporated County area residents have *disabilities*, the units available to disabled persons currently and funded by the County and other sources, likely address the needs of the smaller disabled population in the Unincorporated County areas and thus, this need is lower priority than the need for affordable, elderly, and multifamily housing (which could address affordability and overcrowding.

There are five *racially or ethnically concentrated census tracts (RECAPS)* within Orange County as identified by HUD. These areas, however, are not in the Unincorporated County areas over which the County of Orange has land use jurisdiction. These identified census tracts have at least 50% non-white populations with a poverty rate that exceeds 40% and/or is three or more times the average tract poverty rate for the metropolitan area.

The UC Davis Regional *Opportunity Index* shows that most residents within Orange County have moderate to high levels of access to opportunity, with some areas of low access. Additionally, analysis of the TCAC/HCD Opportunity Area Maps show that a large number of census tracts in northern Orange County have a “low resource” designation, meaning there is low access to essential resources for existing residents in those census tracts.

The County is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying *displacement*. The AI also identifies the following cross-jurisdictional fair housing goals to mitigate the existing fair housing issues in the community:

- Increase the supply of fair housing in high opportunity areas.

- Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, Vietnamese residents, seniors, and people with disabilities.
- Increase community integration for persons with disabilities.
- Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.
- Expand access to opportunities for protected classes.

Section 5, the County's Housing Action Plan, includes policy programs that seek to provide for an increased variety of housing types affordable to all economic segments of the community, as well as further improve general access to housing. The policy programs will provide additional opportunities for current residents and provide new housing opportunities for future residents.

Identification and Prioritization of Contributing Factors

1. Concentrations of Special Needs or Protected Populations

The North and parts of the Central County areas tend to have larger racial/ethnic minority and LMI household populations compared to the South County. These areas also tend to have more prevalent disproportionate housing needs such as overcrowding and displacement risk.

Priority Level: Low

Contributing Factors:

- Lack of investment in certain neighborhoods
- Quantity of affordable housing

2. Lack of Housing Options for Persons with Disabilities

The Central and South Orange County areas tend to have larger elderly populations and populations of persons with disabilities. Certain neighborhoods may have an increased need for housing for persons with disabilities.

Priority Level: Medium

Contributing Factors:

- County ordinances related to persons with disabilities

3. Disparities in Access to Opportunities

Certain neighborhoods, especially in the North and Central County areas, tend to be comprised of more low and moderate opportunities, whereas the South County is predominantly highest resource. These areas also have more tracts with communities at risk of displacement and populations of protected classes.

Priority Level: Low

Contributing Factors:

- Unaffordable rents and sales prices in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private and public investment in specific neighborhoods

4. Disproportionate Housing Needs

Within the Unincorporated County areas, there is a mix, with some pockets that are either established middle-income areas, at risk of becoming exclusive, or are susceptible to or have ongoing displacement. The Unincorporated County areas specifically appear to have a mismatch between the demand for larger affordable units and the available affordable units, as well as (similar to the rest of Orange County) high housing costs.

Priority Level: High

Contributing Factors

- Unaffordable rents and sales prices in a range of sizes
- Shortage of subsidized housing units
- Cost of repairs and rehabilitation
- Dominance of single-family housing, which is typically more expensive than multifamily

5. Fair Housing Enforcement and Outreach

Fair housing outreach for residents in the Unincorporated County is limited and residents may be unaware of their rights and responsibilities, as well as resources available. The County does not currently have a method for the dissemination of fair housing information.

Priority Level: Low

Contributing Factors:

- Limited resources to pay for outreach
- Increasingly fewer people rely on newspapers to receive information; public notices and printed flyers are costly and ineffective means to reach the community at large
- Unknown language barriers and resource barriers to accessing information

5. HOUSING ACTION PLAN

This section of the Housing Element presents the County's Housing Action Plan for the period 2021-2029. The goals, strategies and actions described below are organized according to major issue areas and reflect the findings of the County's needs assessment and evaluation of the accomplishments since the last Housing Element update. The County will review these strategies and actions continuously throughout the planning period and adjust better accomplish the objectives as necessary.

Based on the data in Community Profile, Section 2, the County should consider the following findings, which inform the programs proposed:

- The Unincorporated County population is showing aging trends. Senior residents, generally defined as those over 65 years of age, made up approximately 14.3% of the population in Unincorporated County areas. Based on these trends, housing should consider the needs of seniors who may have less flexible income and need accessibility or assisted living. **See Program 4.**
- Housing should account for cultural needs including larger or multifamily housing units since about 16% of renter households and about 15% of owner households have five or more members (Table 2-43) and additional housing information in other languages. **See Program 3.**
- Table 2-16 Median income shows that Unincorporated Midway City, El Modena, West Anaheim, and Stanton, are all lower-income CDPs based on the median Orange County income of $100,485. The County should, to the extent possible, support affordable housing in those CDPs and throughout Unincorporated County areas. **See Programs 3, 4 and 11**
- Approximately 52.44% of renters (Table 2-31) and 22.7% of homeowners spend more than 30% of their income on housing, indicating a high housing cost burden overall with a higher percentage of renters compared to owners experiencing overpayment. **See Programs 3 and 11.**
- Based on for sale and rental prices, moderate-income households cannot afford to own a home in Unincorporated County areas (Table 2-25 compared to Table 2-26), while lower-income households cannot afford to own or rent without experiencing cost burden (Table 2-25compared to Table 2-28). **See Programs 3 and 11.**
- Table 2-17 demonstrates 53% of rental units and 72.9% of owner-occupied units in Unincorporated County areas are 30 years old or greater, thus, renovations may ensure safer living environments. **See Program 6.**
- Table 2-23 shows a low vacancy rate in Unincorporate County areas at 3.8%, which indicates a high housing demand. **See Program 3.**

- Table 2-39 shows that 12% of homeowners in Unincorporated CDPs who are lower- income have at least one housing problems, while 40% of renters in Unincorporated CDPs who are lower-income have at least one housing problem. Housing problems include: Units with physical defects (no kitchen or bathroom), overcrowding, housing cost burden exceeding 30% of income or severe housing costs burden of 50% of income. **See Program 3 and 6.**

Strategies

- Ensure that the General Plan and Comprehensive Zoning Code identify and zone sufficient land at appropriate densities to accommodate the County's share of regional housing needs.
- Facilitate production of high-quality affordable housing for lower-income and special needs households and permanent supportive housing including affordable housing opportunities for households with incomes less than 30% of area median income (AMI) through inclusionary housing, incentives, and financial assistance.
- Conserve and improve the condition of the existing housing stock, especially affordable housing.
- Work cooperatively with cities and LAFCO to facilitate the annexation and revitalization of urbanized Unincorporated islands.
- Promote equal housing opportunities for all persons without discrimination on the basis of race, religion, ethnicity, sex, age, marital status, disability, or household composition through enforcement of fair housing laws.
- Encourage the development of supportive housing for persons with disabilities, and protected classes, through the following actions.
    - Conduct outreach and education on fair housing rights and of the process to make appropriate referrals for fair housing complaints.
    - Provide housing resources for prevention of homelessness and alternative housing for the homeless and disabled.
    - Address contributing factors to fair housing issues – including access to regional, economic, educational, and environmental opportunities.
    - Encourage the use of energy conservation features in residential construction, remodeling, and existing homes.

Programs, Objectives, Responsible Agencies, Funding Sources

An adequate supply of housing at affordable prices is critical to the long-term economic viability of Orange County. Previous surveys of business leaders have shown that the price of housing is

the leading barrier to business expansion. A shortage of housing at affordable levels makes it more difficult for businesses, government, and universities to recruit new employees, and exacerbates traffic congestion and air quality problems as workers commute longer distances in search of housing.

Through the Regional Housing Needs Assessment (RHNA) process, each jurisdiction is allocated a portion of the region's housing need through the year 2029. The current RHNA allocation projects housing need through the year 2029. The County of Orange's allocation for the 2021-2029 planning period, according to income category is shown in **Table 5-1**.

Table 5-1
Summary of Housing Needs by Income Category – 2021-2029

Extremely Low	Very Low	Low	Moderate	Above Mod	Total
1,570 units	1,569 units	1,866 units	2,040 units	3,361 units	10,406 units
15.1%	15.1%	17.9%	19.6%	32.3%	100%

Source: SCAG, 2021

State law requires that jurisdictions adopt plans and policies to address their RHNA allocation for each planning cycle. The County proposes to address its allocated need for the current planning cycle through a variety of policies and programs that minimize constraints to the development of new housing and proactively assist in the development of housing for persons with low and moderate incomes. As discussed previously, the County's most important, but increasingly limited, resource for housing production is vacant buildable land.

As seen in County's land inventory (Appendix B), the Unincorporated territory under the jurisdiction of the County has shrunk considerably over the past 30 years due to annexations and incorporations. Seven new cities in South County incorporated during this time and multiple major annexations occurred. Taken together, these jurisdictional changes resulted in a loss of over 60,000 acres of Unincorporated territory, with its associated population and developable area.

The key implication of these jurisdictional realignments is that a far greater portion of new residential development in Orange County as a whole will take place within incorporated cities than in years past. Since only one major new planned community remains to be completed in the Unincorporated County areas (the Ranch Plan Planned Community in Rancho Mission Viejo), the County will continue to place major emphasis on infill development strategies in the urbanized Unincorporated islands. This policy will require close cooperation with adjacent cities and surrounding neighborhoods to ensure that new development is compatible with the existing fabric of these communities. A key strategy for the County is to encourage housing development on existing non-residential sites, including underutilized sites along arterial highways, through

application of the Housing Opportunities Overlay Zone. See Appendix B for a detailed discussion on this topic.

Program 1. Provide Adequate Sites, No Net Loss, and Site Replacement

Objectives:

The County has a remaining RHNA of approximately 8,120 units for the 2021-2029 RHNA planning period after credits for permitted or approved units, RHNA transfers, and actual and projected ADU development are taken into consideration. After sites that do not require rezoning are identified there is a RHNA shortfall is 4,625 units. To address the shortfall, the County has identified various sites that, while appropriate for redevelopment and intensification, require zoning amendments that would increase residential development potential and serve as a significant incentive for redevelopment. The Board of Supervisors approved a Zone Change and Zoning Code Amendment in June 2024 to accommodate the remaining RHNA units.

Sites Rezoning

The RHNA shortfall to be addressed for the 2021-2029 planning period is 2,283 units in the very low- income category, 1,624 units in the low-income category, and 718 units in the moderate-income category. The County has made available sites to accommodate the RHNA shortfall by:

- Amending the Housing Opportunities Overlay (HOO) to accommodate a higher density of development by raising the maximum density from 43.5 to 70 du/ac, excluding any applicable density bonus units. The density is available to all properties in the HOO for the development of affordable housing.
- Establishing a minimum density of 30 dwelling units per acre in the Multifamily Dwellings (R2), Apartment (R3), Suburban Multifamily Residential (R4), Residential Profession (RP), and Mixed-Use (MX) zoning districts
- Rezoning properties with a current zone designation of Local Business (C1), General Business (C2), Commercial Community (CC), Commercial Highway (CH), Commercial Neighborhood (CN), or Residential Profession (RP) to the Mixed-Use (MX) zoning district
- Expanding the HOO by adding properties within the Multifamily Dwellings (R2), Apartment (R3), and Suburban Multifamily Residential (R4), Light Industrial (M1) and Mixed-Use zoning districts to the HOO

The County has identified 150 parcels that can be grouped into 59 sites (71.73 acres total) in the newly amended base districts with an HOO overlay. The amendments and rezoning were completed in July 2024. Sites requiring rezoning actions, listed in the sites inventory table in the appendix, have an identified total realistic capacity of 5,137 units (exceeding the RHNA shortfall).

Table 5-2
Summary of Areas to be Rezoned

Zoning	Acres	Parcels	Total Units
HOO-Residential R-2	1.15	5	80
HOO-Residential R-3	1.99	9	142
HOO-Residential R-4	3.06	14	217
HOO-Mixed-Use	57.91	115	4,160
HOO-Other (M-1)	3.15	3	254
HOO Religious Institution Sites	4.47	4	284
Total	**71.73**	***150***	**5,137**

- *HOO: Housing Opportunity Overlay*
- *Density in all portions of the Housing Opportunities Overlay Zone is 70 units/acre and can go as high as 84 units/acre through a graduated density approach based on project size for projects that consolidate multiple properties.*
- *All base zoning districts in the site inventory require a minimum density of 30 units/acre.*

Sites that will be rezoned and used to address an unaccommodated, lower-income RHNA (2,283 very low- income and the 1,624 low-income units) are subject to additional requirements under State law. Housing Element law (Government Code 65583.2[h]) requires that the County accommodate all the lower-income, unaccommodated RHNA on sites that are:

- Zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower-income households during the planning period; and
- Permit at least 16 units per site at a density of at least 20 units per acre; and
- At least half of the very low- and low-income housing need must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all the very low- and low-income housing need on sites designated for mixed-uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

The site inventory shows that 87% of the lower-income RHNA shortfall (3,905 units) is on sites that allow mixed-use development. Sites to accommodate the moderate-income RHNA shortfall (718 units) are not subject to these requirements.

No Net Loss

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element site inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify, at the time of

approval, the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city or county must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project.

The County will evaluate residential development proposals for consistency with goals and policies of the General Plan and the 2021-2029 Housing Element sites inventory and make written findings that the density reduction is consistent with the General Plan and that the remaining sites identified in the Housing Element are adequate to accommodate the RHNA by income level. If a proposed reduction of residential density will result in the residential sites inventory failing to accommodate the RHNA by income level, the County will identify and make available additional adequate sites to accommodate its share of housing need by income level within 180 days of approving the reduced density project.

Site Replacement
Government Code Section 65583.2(g)(3) requires the replacement of units affordable to the same or lower-income level as a condition of any development on a nonvacant site identified in the Housing Element consistent with those requirements set forth in Government Code section 65915(c)(3). Replacement requirements shall be met for sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or
- Occupied by low or very low-income households For the purpose of this program "previous five years" is based on the date the application for development was submitted.

Pursuant to Government Code section 66300(d) (Chapter 654, Statutes of 2019 (SB 330)), the County shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund, State and Federal Grants (see funding descriptions below)

Timeframe: Rezoning actions: Adopted by the Board of Supervisors on June 25, 2024; as part of the entitlement review process, evaluate new projects for consistency with General Plan

objectives as they relate to housing and RHNA obligations; ongoing implementation and annual assessment of status of housing sites inventory as part of the annual reporting process.

Program 2: Zoning Code Amendments

Objectives:

- Comply with Government Code Section 65583.2 which requires that vacant sites that were identified in the County's 4th and 5th cycles Housing Element as sites for the lower-income RHNA and nonvacant sites that were identified in the County's 5th cycle Housing Element as sites for lower-income RHNA are subject to by-right approval (exempt from CEQA) and subject only to design review based on objective standards, when a project includes 20 percent of the units affordable to lower-income households and no subdivision is proposed. The County did not identify vacant potential sites in this 6th Cycle site inventory that were identified in the previous two cycles and thus, there are no vacant sites that need to be re-zoned. Parcels that are subject to by-right approval pursuant to State law are identified in Appendix C.
- Continue to allow emergency shelters without Use Permit or other discretionary permit in the commercial and industrial portions of the Housing Opportunities Overlay Zone subject to appropriate development standards pursuant to Government Code Sec. 65583.a.4.
- Remove the Site Development Permit requirement for multifamily development of 1 to 4 units and any developments that include at least 20% affordable units. These uses will be allowed as a by-right use. For multifamily development with 5 or more units, the Site Development Permit requirements will be amended to replace the current findings with objective findings, including conformance with proposed Objective Design and Development Standards.
- Adopt Objective Design Standards (ODS) to provide local guidance on design and standards for housing development, including by-right projects, as allowed by State law and the Housing Accountability Act which prohibits a local agency from disapproving or reducing the density of housing development projects that comply with local and state regulations unless the agency can make certain written findings.

Responsible Agencies: OC Community Resources, OC Housing Authority, and OC Development Services

Funding Sources: General Fund, State and Federal Grants and Loans (see grant descriptions below), HUD Housing Choice Voucher Program Section 8

Timeframe: Rezoning actions and ODS: Adopted by the Board of Supervisors on June 25, 2024.

Program 3. **Facilitate Affordable Housing Development**

The County will provide an adequate supply of housing that varies sufficiently in cost, style, tenure, and neighborhood type to meet the economic and social needs of existing and future residents of the county; and which provides sufficient housing opportunities to achieve a better jobs-housing balance for employees of businesses located in the Unincorporated County areas.

Objectives:

Specifically, the County will:

- Within 12 months of Housing Element adoption/certification, encourage and facilitate affordable housing development by providing information on the County website about opportunities and resources for affordable housing development. Specifically:
    - Create a Housing Opportunities Overlay Map and webpage to providing information about the Housing Opportunities Overlay and identify areas where higher density projects would be permitted with expedited processing, and which may be eligible for density bonuses.
    - Develop informational materials on the County's website regarding the County's lot consolidation incentives and density bonus program.
- OC Development Service's "Affordable Housing Project Manager" will promote the MyOCeServices web portal and the ease of application review and approval of affordable housing projects. The Affordable Housing Project Manager will ensure that permit issuance for proposed projects is not unnecessarily delayed.
- Every two years, review incentives for density bonuses, expedited permit processing procedures, development standards, tax-exempt conduit financing, infrastructure financing assistance, and direct financial assistance to determine if changes or updates are needed to further facilitate the production of affordable units.
- Within one year of approval of the Housing Element and approval by the Department of Housing and Community Development, OC Development Services will update its "Orange County Housing Opportunities Manual" and will also create and distribute promotional materials explaining the County's expedited permit processing and incentives for affordable housing to be provided to developers in the region. The following incentives for the development of affordable housing are offered or will be offered:

  - Expediting the approval process for parcel maps that include affordable housing units.
  - Ministerial (no public hearing) review of lot line adjustments.
  - Provide technical assistance, through the OC Community Resources division, to acquire funding.
  - Modification of development standards.

- Create an administrative review process for residential rental and owner-occupied projects that include at least 20% affordable units. The process provides applicants with a submittal checklist of applications materials and information needed including a general description of the projects, a copy of an affordability agreements, architectural plans, a Water Quality Management Plan Checklist, and if applicable, a request for a density bonus consistent with State law.
- The County will continue to participate in the Housing Choice Voucher Program (See Program 10) to provide rent subsidies to very low-income households provided funding is available. On an ongoing basis, review the County Housing Authority's participation in the Housing Choice Voucher Section 8 Rental Assistance Program and pursue additional vouchers/funding when available. Review annually and update the Supportive Housing Notice of Funding Availability for financial assistance for the development of housing.
- Continue to publish the Affordable Housing Rental List and review/update list annually.
- Continue to support the DPRC in reviewing existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production. This includes ensuring guidance documents that are available to applicants clearly identify which approvals and/or permits specific housing projects are generally exempt from (e.g., lot consolidation for small housing sites does not generally require a parcel map). Approved DPRC policy and code amendment recommendations will be implemented within one fiscal year from approval.
- Review funding opportunities bimonthly and aggressively pursue, as the County has been, all state and federal housing grant funds for which the County is eligible.
- Approve affordable housing projects in Rancho Mission Viejo administratively and report annually to State HCD and the Board of Supervisors regarding progress toward the development of Rancho Mission Viejo and its affordable housing sites through a required Annual Monitoring Report

- Coordinate with the City of Newport Beach for development and shared RHNA credit of the identified parcels on the County-owned Coyote Canyon site (as shown in Appendix B). Include 30% of the County's total unit share as affordable units (618 total units including 186 units set aside for deed-restricted, affordable housing for lower-income [10%] and moderate-income households [20%]).
- Work with all applicants proposing rental residential projects to encourage four-bedroom units that can providing adequate housing for all households, including large-family households (which are defined as those consisting of five or more members).
- Within 1 year of adoption of the Housing Element and approval by the Department of Housing and Community Development, meet with Developers and DPRC to identify potential constraints to the development of affordable housing and housing for those with special needs in the County's Zoning regulations. Address any identified constraints within 6 months.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund, State and Federal Grants (see funding descriptions below).

Timeframe: Administrative review process for qualified development projects: Adopted July 2024; HOO map and website within 18 months of Housing Element adoption and certification; Update Housing Opportunities Manual (completed in July 2024) and create and distribute lot consolidation incentives and density bonus informational materials: March 2025. Initiate review of incentives by June 2025; meet with developers and the DPRC starting in January 2025; Implement approved DPRC policy and code amendment recommendations within one fiscal year from approval.

Program 4: Promote Affordable Housing

In connection with other programs, continue to work with existing partners and seek new partners and volunteers from stakeholder and industry groups to further opportunities and provide incentives where possible for affordable housing.

Objectives:

Proactively encourage and facilitate the development of affordable housing by non-profit organizations and Orange County jurisdictions for lower-income households, particularly those with special needs including large households, seniors, extremely low-income (ELI) households, and households with persons who have disabilities or developmental disabilities. OC Community Resources staff will work cooperatively with other governmental agencies, business groups,

universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County's long-term viability and the programs to facilitate affordable housing.

Specifically, the County will:

- On an ongoing basis, provide letters of support to affordable housing developers' applications to local, State, and Federal agencies for funding, provided the proposed projects are consistent with the goals and policies of the General Plan.
- Within 2 years of Housing Element approval, seek concurrence from the state Department of Housing and Community Development that affordable units built in cities and assisted with County funds (i.e., multi-jurisdictional agreement) should be partially credited toward the County's housing production for RHNA purposes in proportion to the amount of County funding.
- Work with cities and developers to identify incentives to reach agreements to transfer Regional Housing Needs Assessment (RHNA) credits for units transfer within city boundaries through a multi-jurisdictional agreement. Review strategy and approach annually.
- Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing. Consult with LAFCO at least once annually to identify priority areas with the highest potential for affordable housing development and annexation.
- Support development of affordable housing on religious property consistent with State law. Meet with owners of the religious properties identified in the inventory of sites to address the 6th Cycle RHNA (Appendix B). Provide information about regulatory changes (such as streamlined development), development standards and affordability requirements and incentives and/or assistance available through the County for development of housing on religious institution properties. Send the same informational material to all churches in the Unincorporated County.
- Meet annually with non-profit developers and housing organizations to evaluate projects for acquisition and rehabilitation/new construction of new shelters, and long-term affordable housing, including senior housing.
- Conduct an annual informational meeting with stakeholders, including the development community and property owners to facilitate housing development, including discussion of ADUs, expedited permit processing and lot splits or consolidations.

- Twice annually attend and promote development incentives at the monthly Housing Opportunities Committee meeting and the bi-monthly OC Housing Finance Trust meetings.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Source: General Fund

Timeframe: Meet with non-profit developers and housing organizations every other year starting in 2025; Meet with owners of the religious properties identified in the inventory of sites to address the 6th Cycle RHNA by January 2025; Meet with the City of Newport Beach: November 2024; Initiate annual LAFCO meetings: January 2025.

Program 5: Density Bonus Ordinance

In compliance with Government Code section 65915, *et. seq.* the County has a Density Bonus ordinance that has been amended as needed to comply with State law, and which will continue to be amended as needed to comply with State law.

Objectives:

- Update Density Bonus Ordinance as needed to reflect changes to State Density Bonus law.

Responsible Agency: OC Development Services

Funding Source: General Fund

Program 6: Rehabilitate and Preserve Existing Residential Units, Especially Affordable Units

New construction represents a relatively small percentage of the Unincorporated County areas' total housing inventory. The preservation and rehabilitation of the existing housing stock, especially affordable apartments, is essential to meet the County's housing needs. Most of the housing in need of rehabilitation within the Unincorporated County areas is in the older Unincorporated islands in North County. While no affordable units are at-risk of converting during the planning period, assisted rental projects that are eligible to convert to market rate due to the expiration of agreements between the owners and government agencies are of particular concern. The County participates in a variety of programs that provide assistance and incentives to property owners for carrying out needed repairs. Projects eligible to convert to market rate have also been evaluated for opportunities to extend existing commitments to maintain rents at

affordable levels, and the County has regularly been successful in extending commitments to maintain rents at affordable levels.

It is also recognized that mature areas such as northern Orange County require ongoing investment for the general maintenance and periodic replacement of infrastructure such as streets, sidewalks, water and wastewater systems, storm drains, streetlights, landscaping, and other public facilities in order to maintain the quality of residential neighborhoods. Without this public investment, residents and landlords may be discouraged from making needed repairs to their properties and gradual deterioration may occur. In addition to the County's General Fund, the federal CDBG program provides financing for accessibility upgrades infrastructure maintenance and replacement.

Many of the older Unincorporated neighborhoods are in "islands" within city spheres of influence. The Board of Supervisors has established a policy of working cooperatively with the cities and LAFCO to facilitate the annexation of these islands in a timely manner. Where possible, such annexations should be part of a comprehensive program to help revitalize these communities by upgrading substandard housing and other facilities such as streets, storm drains, sidewalks, parks, and schools. Absent annexation, the County also expends County funds on public infrastructure projects within these Unincorporated "islands" to ensure the public facilities remain functional and compliant with modern regulations.

Objectives:

- Use available housing funding to finance housing rehabilitation. Assist ten households through rehabilitation efforts annually.
- While no affordable housing units have expiring affordability covenants, continue to monitor affordable housing projects with affordability covenants and take appropriate action to preserve these affordable units whenever if they become at-risk of converting to market rate housing (e.g., extending contracts for participation in affordable housing programs). Annually, promote funding and other opportunities to owners considering conversion of units through existing outreach programs and the County's website.
- On an ongoing basis, implement and review the County's code enforcement and graffiti removal programs. Facilitate five improvements annually through the code enforcement and/or graffiti removal programs.
- On an ongoing basis, provide infrastructure maintenance in existing residential neighborhoods, including through the Capital Improvement Program (CIP). Facilitate 10 infrastructure improvements, including seven in the North and Central County Unincorporated areas during the planning period.

- On an ongoing basis, participate in the CDBG, HOME and related programs as a means of providing pass-through funding to affordable housing projects and efforts to rehabilitate existing affordable units or projects. Review opportunities annually.
- Annually, identify existing apartment complexes in need of repair and provide financial assistance or other incentives to encourage the owner to make a substantial investment in rehabilitation and ongoing maintenance and guarantee long-term affordability. Assist three apartment complexes through rehabilitation efforts.
- On an ongoing basis, enforce the provisions of the County's condominium and mobile home park conversion ordinance (section 7-9-89 and 7-9-92). Review compliance annually.

Responsible Agencies: OC Community Resources, CEO/Public Finance, and OC Development Services

Funding Sources: General Fund, State and Federal Grants and Loans (see grant descriptions below), CBGB and HOME (see Program 10, Pursue Funding Sources and Programs).

Program 7: Accessory Dwelling Units

In July 2020, the County updated the Comprehensive Zoning Code in accordance with the October 2019 passage of California Assembly Bill AB 68 (AB 68), Assembly Bill 881 (AB 881), Assembly Bill 587 (AB 587), Assembly Bill 671 (AB 671), and Senate Bill 13 (SB 13). The provisions encourage the development of ADUs by making the process less restrictive for homeowners and provide incentives for their development and/or preservation. ADUs are an important and feasible method for providing additional affordable housing units while maintaining the existing character of the Unincorporated County areas.

Objectives:

- Facilitate the development of Accessory Dwelling Units through:
    - Implementation of, within 2 years of adoption of the Housing Element and its certification by the Department of Housing and Community Development, an informational program to disseminate easily understandable information to homeowners regarding the construction of ADUs in the Unincorporated County areas. This will include the creation of a webpage on the County's website, fact sheets available in public areas, and notification to all citizen advisory groups. Disseminate information annually starting in January 2025.

- Preparation of pre-approved ADU plans to assist the public and streamline development of ADUs (Completed July 2024).
- Implementation of the Affordable Accessory Dwelling Unit Loan Program Policy Manual (July 19, 2023), within 2 years, designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences. Aimed to expand access to income opportunities for homeowners while also providing much needed affordable rentals exclusively for very low-income tenants with a priority on Section 8 voucher holders.

- Continue to track ADU Development through the ADU Monitoring Program. The program tracks applications for ADUs, location, and affordability of any ADUs offered for rent within the Unincorporated County areas. The intent of the Monitoring Program is to track progress in meeting 2021-2029 ADU construction goals and to evaluate the need to adjust programs and policies if the pace of construction is less than anticipated. Should changes need to be made due to a gap in the number of ADUs projected and the number permitted, the County will make changes proportional to the gap identified within 6 months of the annual review. This may include, but is not limited to, rezoning or community outreach.

Responsible Agencies: OC Development Services

Funding Sources: General Fund

Timeframe: Pre-approved ADU plans available to the public: Completed July 2024; ADU informational program: June 2025; Implementation of the Affordable Accessory Dwelling Unit Loan Program Policy Manual: June 2026

Objective*:* 513 ADUs during the planning period (this objective is a subset of and not in addition to the Quantified Objective for Program 1: Adequate Sites)

Program 8: Equal Housing Opportunity – Affirmatively Furthering Fair Housing

Equal housing opportunity is a fundamental right of all Americans. Federal and state fair housing laws make discrimination illegal, but enforcement action is sometimes necessary to ensure that existing laws are upheld. Existing federal law also requires new buildings to make reasonable accommodation for persons with disabilities. Section 4 provides a detailed assessment of the County's fair housing status. Additionally, the actions below aim to meaningfully address the fair housing and contributing factors identified in the most recent Orange County Analysis of Impediments to Housing Choice (AI) report and by the analysis provided in Section 4. An objective of this program is to facilitate the development of housing

that meets the needs of all segments of the population including affordable housing and households with specialized needs.

***Objectives**:*

- Objectives, timelines, geographic targeting, and 8-year metrics for actions to affirmatively further fair housing are detailed below. Actions include implementations measures under other programs in this Housing Element and new actions specific to this Program 8.

Responsible Agencies: OC Community Resources and OC Development Services

Funding Sources: General Fund. State and Federal grants and loans

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
Fair Housing Outreach and Enforcement				
Program 3: Facilitate Affordable Housing Development	Create a Housing Opportunities Overlay Map and webpage providing information about the Housing Opportunities Overlay and identify areas where higher density projects would be permitted with expedited processing, and which may be eligible for density bonuses.	Within 18 months of adoption/ certification of the Housing Element.	Countywide	Develop outreach and informational materials with the goal of facilitating the development of 8,122 housing units during the planning period.
	Develop informational materials on the County's website regarding the County's lot consolidation incentives and density bonus program.			
	Update the "Orange County Housing Opportunities Manual" and will also create and distribute promotional materials explaining the County's expedited permit processing and incentives for affordable housing to be provided to developers in the region.	Within 1 year of adoption and certification of the Housing Element.		
	Publish and review the Affordable Housing Rental List.	Annually		
Program 4: Coordination with Affordable Housing Stakeholders	Provide letters of support to affordable housing developers' applications to local, State, and Federal agencies for funding, provided the proposed projects are consistent with the goals and policies of the General Plan.	Initiate by January 2025 Annually	Countywide	Annually coordinate with regional entities and stakeholders to pursue and identify priority areas for affordable housing opportunities.
	Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing.			
	Conduct meetings with stakeholders, including the development community and property owners to facilitate housing development.			
	Attend and promote development incentives at the monthly Housing Opportunities Committee meeting and the bi-monthly OC Housing Finance Trust meetings.	Twice annually		
Program 8. AFFH	Implement Restrictive Covenant Modification Plan (RCM) including Phase III, examination of remaining handwritten documents for unlawful languages and process.	By July 2027	Countywide	Complete all three Phases of the RCM Implementation Plan during the planning period.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	Continue to work under contract with the FHCOC and/or other qualified fair housing service providers to provide fair housing services for all segments of the community. Evaluate and adjust the scope of services to ensure the County addresses any emerging trends in fair housing.	Annually	Countywide with emphasis on the North and Central County where there are concentrations of LMI households.	Serve 100 households through fair housing services annually.
	Provide federal/state/local information regarding discrimination to residents at family briefing sessions, including applicable Fair Housing Information and Discrimination Complaint Forms.			
	Maintain bilingual staff to assist non-English speaking families and ensure handicap accessible offices.			
	Work with the fair housing agencies to provide information and regarding housing discrimination and intervention to resolve complaints.			
	Use non-traditional media (e.g., social media, County website) in outreach and education efforts in addition to print media and notices.			
	Update the Affordable Housing Rental List (translated in multiple languages) on the County website.			
	Publish a Housing Assistance Guide that informs community members of the existence of the Orange County Fair Housing Council (FHCOC) and its oversight of fair housing practices. Ensure the guide is available both on the County's website and at the Planning counter and at the OC Housing Authority.	By December 2025	Countywide	
	The County shall work with local resource agencies to implement an outreach program informing families within the county of housing and services available for persons with developmental disabilities.	Annually	Countywide with emphasis on North County Unincorporated areas.	Outreach to residents with the goal of serving 30 persons annually through services for persons with disabilities
Housing Mobility				
Program 2: Zoning Code Amendments	Allow emergency shelters without Use Permit or other discretionary permit in the commercial	By October 2024	Countywide	Revise the Zoning Code to allow emergency shelters

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	and industrial portions of the Housing Opportunities Overlay Zone.			without discretionary permit in the commercial and industrial portions of the Housing Opportunities Overlay Zone with the goal of initiating plans for a new emergency shelter.
	Remove the Site Development Permit requirement for multifamily developments of 1 to 4 units and any developments with 20% affordable units and allow by-right. Amend the Site Development Permit requirements for objective findings for developments of 5 units or more.			Facilitate the development of 8,122 units, including 4,494 affordable to lower-income households.
	Adopt Objective Design Standards (ODS).			
Program 3: Facilitate Affordable Housing Development	Review the County Housing Authority's participation in the Housing Choice Voucher Section 8 Rental Assistance Program and pursue additional vouchers/funding when available.	Annually	Countywide	Annually pursue additional funding for Section 8 Rental Assistance with the goal of increasing the number of voucher holders by 10% during the planning period.
	Work with applicants who propose for rent-residential projects to encourage four-bedroom units for large families as part of the proposed developments.	As proposals are received (ongoing)		Work with developers with the goal of developing of 50 units suitable for large households during the planning period.
	Meet with Developers and DPRC to identify potential constraints to the development of affordable housing and housing for those with special needs in the County's Zoning regulations.	Within 1 year of adoption Address within 6 months	Countywide	Facilitate the development of 8,122 units including 200 for persons with special needs (persons with disabilities, seniors, etc.).
Program 4: Coordination with Affordable Housing Stakeholders	Meet with owners of the religious properties identified in the inventory of sites and provide information on regulatory changes, development standards and affordability requirements and incentives and/or assistance available through the County for development of housing on religious institution properties.	By January 2025	Countywide	Initiate discussions of affordable housing development on religious properties with two owners during the planning period.
	Meet with non-profit developers and housing organizations to evaluate projects for	Annually		Facilitate the development of 200 units for special needs

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	acquisition and rehabilitation/new construction of new shelters, and long-term affordable housing, including senior housing.			populations (seniors, persons with disabilities, persons experiencing homelessness, etc.).
Program 8. AFFH	Review Definition of Single Housekeeping Unit. To promote flexibility to accommodate residents with different living conditions, the County will review and adopt revisions as appropriate to its zoning code to provide greater flexibility in consideration of accommodating a variety of household situations for related and unrelated individuals living together.	By December 2026	Countywide with emphasis on the Central County where populations of persons with disabilities are highest.	Facilitate the development of 50 units for persons with disabilities during the planning period.
	Review Group Home/Sober Living Home ordinances to ensure there is no governmental constraint posed on the development of group homes or sober living homes.	By December 2026		
	Seek State and Federal monies, as funding becomes available, for permanent supportive housing construction and rehabilitation targeted for persons with disabilities, including persons with developmental disabilities.	Annually		
	Develop a program /ordinance to provide regulatory incentives, such as expedited permit processing and fee waiver, to projects targeted for persons with disabilities, including persons with developmental disabilities.	Within 2 years of adoption of the Housing Element.		
	On an ongoing basis, enforce building code provisions requiring accessible design.	Annually		
	On an ongoing basis, implement the reasonable accommodation ordinance.			
	On an ongoing basis, ensure the permitting requirements for group homes and care facilities for seven or more persons are consistent with State law and fair housing requirements.			
New Housing Opportunities in High Resource Areas				
Program 1: Provide Adequate Sites and Monitor for No Net Loss	Sites Rezoning – Amend the HOO to accommodate a higher density of development, establish a minimum density for	By July 2024	Housing Opportunities Overlay (HOO)	Make 150 sites available to accommodate the RHNA shortfall of 2,283 very low-,

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	R2, R3, R4, RP, and MX zones, rezone C1, C2, CC, CH, CN, RP to MX, and expand the HOO.			1,624 low-, and 718 moderate-income units.
	No Net Loss – Identify and make available additional adequate sites to accommodate the share of housing need by income level.	Within 180 days, if required	Countywide	Ensure Housing Element sites are adequate to accommodate the RHNA and identify new sites, if necessary.
Program 3: Facilitate Affordable Housing Development	Review incentives for density bonuses, expedited permit processing procedures, development standards, tax-exempt conduit financing, infrastructure financing assistance, and direct financial assistance.	Every two years	Countywide	Ensure adequate sites remain available to accommodate 8,122 units during the planning period.
	Review with DPRC members the existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production.	Within 1 FY of approval		
	Review funding opportunities and aggressively pursue, as the County has been, all state and federal housing grant funds for which the County is eligible	Bimonthly		
	Approve affordable housing projects in Rancho Mission Viejo administratively.	Ongoing	Rancho Mission Viejo	
	Coordinate with the City of Newport Beach for development and shared RHNA credit of the identified parcels on the County-owned Coyote Canyon site.	By November 2024	Coyote Canyon site	
Program 7. Accessory Dwelling Units	Implement an informational program to disseminate information about developing ADUs.	Within 2 years of adoption Annually	Countywide with emphasis on the South County Unincorporated areas	Facilitate the development of 506 ADUs, including 336 affordable to lower-income households.
	Prepare pre-approved ADU plans.	July 2024		
	Implement the Affordable ADU Loan Program Policy Manual.	Within 2 years of adoption		
Program 10: Inclusionary Housing	Initiate consideration of an Inclusionary Housing Program/Policy.	By December 2026	Countywide with emphasis on the South County Unincorporated areas	Facilitate the development of 4,494 units affordable to low-income households (RHNA) including 75% in high or highest resource areas.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
Program 11: Pursue Funding Sources To Achieve Housing Action Plan Goals	Leverage Homekey funds to purchase or rehabilitate housing, including hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or permanent, long-term housing.	Annually	Countywide	Facilitate the development of one interim or permanent, long-term housing project using Homekey funds during the planning period.
Place-based Strategies for Neighborhood Improvement				
Program 6. Rehabilitate and Preserve Existing Residential Units	Use available housing funding to finance housing rehabilitation.	Annually	Central and North County where aging units are more common	Assist 10 households through rehabilitation efforts annually.
	Implement and review the County's code enforcement and graffiti removal programs.	Ongoing		Facilitate 5 improvements annually through the code enforcement and/or graffiti removal programs.
	Provide infrastructure maintenance in existing residential neighborhoods, including through the Capital Improvement Program (CIP).	Annually	Countywide with emphasis on North and Central Orange County where opportunity sites for lower-income RHNA units have been identified.	Facilitate 10 infrastructure improvements, including 7 in the North and Central County Unincorporated areas during the planning period.
	Participate in the CDBG, HOME and related programs as a means of providing pass-through funding to affordable housing projects and efforts to rehabilitate existing affordable units or projects.	Annually	Central and North County where aging units are more common	Assist 10 households through rehabilitation efforts annually.
	Identify existing apartment complexes in need of repair and provide financial assistance or other incentives to encourage the owner to make a substantial investment in rehabilitation and ongoing maintenance and guarantee long-term affordability.	Annually	Countywide with emphasis on the Central County where cost burdened renter populations are heightened.	Assist 3 apartment complexes through rehabilitation efforts.
Program 8: AFFH	Adopt and implement an Environmental Justice (EJ) Element during the planning period.	By 2031	Countywide including actions targeting and benefiting North and Central County areas with worsened environmental conditions.	Adopt an Environmental Justice Element during the planning period.
Program 8: AFFH	Implement the County CIP plan including ADA, roadway, and infrastructure improvements in	Annually	Countywide with emphasis on North	Complete 10 CIP improvements annually

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	the Unincorporated County. Improvements may include: • Curb ramp, sidewalk, and driveway upgrades and improvements to satisfy current ADA standards and requirements. • Parkway, sidewalk, and intersection improvements.		County where opportunities indices are lower.	including 3 in the North County area.
Program 8: AFFH	Facilitate the development or improvement of parks and open space under the County's CIP plan or other implementation plan benefiting residents of Unincorporated communities, particularly communities with reduced access to environmental opportunities. Projects may include: • Development of Mile Square Regional Park in Fountain Valley • Santa Ana River Trail • Ted Craig Regional Park improvements • Yorba Regional Park improvements	By 2031	North and Central County	Facilitate the development or improvement of 2 parks, open spaces, or recreational facilities during the planning period.
Tenant Protections and Anti-displacement				
Program 1: Provide Adequate Sites and Monitor for No Net Loss	Site Replacement – Comply with site replacement requirement pursuant to Government Code Section 65583.2(g)(3). Replace sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and: • Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or • Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or • Occupied by low or very low-income households For the purpose of this program "previous five years" is based on	As necessary (ongoing)	Countywide	Replace 100% of units for sites that meet the replacement requirement outlined in Program 1.

Table 5-3: Equal Housing Opportunity – Affirmatively Furthering Fair Housing Program

Program	Meaningful Action	Timeline	Geographic Targeting	8-Year Metric
	the date the application for development was submitted.			
Program 6. Rehabilitate and Preserve Existing Residential Units	Monitor projects with expiring affordability covenants and take appropriate action to preserve these affordable units whenever possible. Promote funding and other opportunities to owners considering conversion of units through existing outreach programs and the County's website.	Annually	Countywide	Preserve affordability of all 1.051 affordable units in the County.
	Enforce the provisions of the County's condominium and mobile home park conversion ordinance.			
Program 11: Pursue Funding Sources To Achieve Housing Action Plan Goals	Continue to fund and serve persons experiencing homelessness through the Building Industry Association/HomeAid Program.	Annually	Countywide	Assist 50 persons experiencing homelessness annually through the Building Industry Association/HomeAid Program

Program 9: Energy Conservation in Residential Developments

State law requires that jurisdictions analyze opportunities for energy conservation in residential development as part of their Housing Element review process. Controlling energy costs is one key component of the larger housing affordability issue.

Title 24 sets forth mandatory energy standards and requires the adoption of an "energy budget" for all new residential buildings and additions to residential buildings. Separate requirements are adopted for "low-rise" residential construction (i.e., no more than 3 stories) and non-residential buildings, which includes hotels, motels, and multifamily residential buildings with four or more habitable stories. The standards specify energy saving design for lighting, walls, ceilings, and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards and the use of non-depleting energy sources, such as solar energy or wind power. The home building industry must comply with these standards while localities are responsible for enforcing the energy conservation regulations through the plan check and building inspection processes.

In addition to architectural and construction techniques, thoughtful land use planning provides additional opportunities for energy savings. Examples of the County's energy-saving land use strategies include higher density along transit routes and close to employment centers and infill development. The Housing Opportunities Overlay Zone advances this goal, as does the County's long history of approving balanced communities such as Ladera Ranch and Rancho Mission Viejo planned communities.

Objectives:

- Review and update annually information on the County's website relating to energy conservation.
- On an ongoing basis, provide information regarding energy efficiency measures in the Orange County Housing Opportunities (HOO) Manual. Review and update manual annually related to energy conservation and on an ongoing basis provide manual online and at the County Service Center.
- On an ongoing basis, provide clients and the Development Processing Review Committee (DPRC), with information regarding "CalGreen" – California's Green Building Code. Review and annually update information on the County's website and at the County Service Center relating to the Green Building Code.
- On an ongoing basis provide sustainable provisions from the Board adopted Comprehensive Zoning Code Update to property owners online and at the County Service Center. Update information annually.

Responsible Agencies: OC Development Services

Funding Sources: General Fund and Utilities

Timeframe: Initiate annual website reviews and updates: January 2025; Update HOO Manual: Completed July 2024.

Program 10: Inclusionary Housing Program

An inclusionary housing program could boost production of homes for households earning 50% or less of the median income.

Objectives:

- Initiate consideration of an Inclusionary Housing Program (IHP) by 2026 to expand affordable housing options by considering a set aside of a certain number of units for households earning 50% or less of the median income. The County ordinance may propose that this affordable requirement could be provided either on-site, off-site, or through the payment of an in-lieu fee or provision of land. The in-lieu fee option would be intended primarily for small to midsize in-fill developments or subdivisions where insufficient land exists to provide both for-sale and rental units.

Responsible Agency: OC Development Services

Funding Sources: General Fund

Timeframe: Initiate IHP consideration; January 2026

Program 11: Pursue Funding Sources to Achieve Housing Action Plan Goals

The County has access to a variety of funding sources to provide adequate supply of decent and affordable housing and to accomplish the goals and strategies set forth in the Housing Action Plan. Facilitate the development of one interim or permanent, long-term housing project using Homekey funds during the planning period. Assist 50 persons experiencing homelessness annually through the Building Industry Association/HomeAid Program.

a. Federal Resources

HOME Funds

The HOME Investment Partnership (HOME) Program is a federal program, created as a result of the National Housing Affordability Act of 1990. Under HOME, HUD awards funds to localities on the basis of a formula that takes into account tightness of the local housing market, inadequate housing, poverty, and housing production costs. Localities must qualify for at least $500,000,

based on HUD's distribution formula, to receive direct allocation of funds, or can apply to the state or combine with adjacent jurisdictions.

HOME funding is provided to jurisdictions to assist either rental housing or homeownership through acquisition, construction, reconstruction, and/or rehabilitation of affordable housing. Also possible is tenant based rental assistance, property acquisition, site improvements, and other expenses related to the provision of affordable housing and for projects that serve a group identified as having a special need related to housing. The local jurisdiction must make matching contributions to affordable housing under HOME.

Community Development Block Grant Program (CDBG)

Through the federal CDBG program, HUD provides funds to local governments for funding a range of community development activities. For housing purposes, CDBG funds can be used for single and multifamily rehabilitation, rental housing acquisition or homeownership assistance, and other activities that support new housing construction (such as acquisition of property). CDBG grants benefit primarily persons/households with incomes not exceeding 80% of the County Median Family Income.

Section 108 Program

Section 108 is the loan guarantee provision of the CDBG program. This provision provides communities with a source of financing for a variety of housing and economic development activities. All rules and requirements of the CDBG program apply, and therefore all projects and activities must principally benefit low- and moderate-income persons, aid in the elimination or prevention of blight, or meet urgent needs of the community.

Monies received under the Section 108 loan guarantee program are limited to not more than 5 times the applicant's most recently approved CDBG amount, less prior Section 108 commitments. Activities eligible for these funds include economic development activities eligible under CDBG; acquisition of real property; rehabilitation of publicly-owned property; housing rehabilitation eligible under CDBG; construction, reconstruction, or installation of public facilities; related relocation, clearance or installation of public facilities; payment of interest on the guaranteed loan and issuance costs of public offerings; debt service reserves; and public works and site improvements.

Section 108 loans are secured and repaid by pledges of future and current CDBG funds. Additional security requirements may also be imposed on a case by case basis.

Mortgage Credit Certificate Program

Under the Mortgage Credit Certificate (MCC) Program, first-time homebuyers receive a tax credit of up to 15% of the mortgage interest paid for the year based on a percentage of the interest paid on their mortgage. This credit typically amounts to $80 to $125 month. This tax credit allows the buyer to qualify more easily for home loans as it increases the effective income of the buyer. Under federal legislation, 20% of the allocation must be set-aside for first time homebuyers with incomes between 75% and 80% of the County median income. This program may be used alone or in conjunction with a Down Payment Assistance Loan. The mortgage tax credit allows participants to meet monthly housing costs for households unable to meet monthly market-level payments. Additionally, lenders may write down the cost of the mortgage based on the value of the credit.

For the 2013-2021 planning period, the County financed thirty-one (31) homes through the CEO's first-time homebuyer program for low-income and moderate-income Orange County residents.

Housing Choice Voucher Section 8 Housing and Continuum of Care/ Certificates Grant Programs

The Housing Choice Voucher Section 8 Program and Continuum of Care/Certificate Grants provide monthly housing assistance payments to owners of rental properties in order to assist extremely low and very low-income families, elderly, and disabled persons with their rent. Housing Choice Voucher participants can choose any housing that meets the requirements of the program and are not limited to units located within subsidized housing projects. The Orange County Housing Authority (OCHA) administers Housing Choice Voucher Program within the Unincorporated Orange County area (as well as 31 of the 34 cities in Orange County). The rental assistance represents the difference between 30% of the recipients' adjusted monthly income and the federally approved Fair Market Rents (FMR), locally established Payment Standards or the owner's Gross Rent; whichever is less. In general, the FMR for an area represents the 40th percentile of median rents in a designated local metropolitan area. These programs are designed to utilize privately owned, decent, safe, and sanitary rental housing and assistance is available in the following forms:

- Continuum of Care/ Housing Certificate Program. This program is funded with annual renewal grants to assist homeless/disabled individuals who are qualified and referred to the Housing Authority through the Orange County Coordinated Entry System (CES). Under the certificate program, the property owner selects an eligible tenant and enters into a contract with the Orange County Housing Authority that establishes the total rent, following an inspection and approval of the rental property. The actual approved rent cannot exceed contract rents for non-assisted units comparable units in the area as determined by Rent Reasonableness. Once approved, eligible tenants must pay the highest of either 30% of adjusted

income or 10% of gross income. Housing subsidized through this program must meet Federal Housing Quality Standards established by HUD.

- Housing Choice Voucher Program (HCVP). This program is the largest tenant-based housing program and also includes Special Purpose Vouchers reserved for specific populations including the Veterans Administration Assisted Housing (VASH), Non-Elderly Disabled (NED), Family Unification (FUP), Project-based Vouchers (PBV), Mainstream and Homeownership programs. HCVP is similar to the Certificate Program and requires Housing Quality Standards inspections and the Rent Reasonableness to determine the approvable contract rent. However, the Housing Authority is able to establish Payment Standards which may be 90% to 110% of the published Fair Market Rents. The monthly Housing Assistance Payment (HAP) is determined by subtracting 30% of the tenant's adjusted income from the approved Gross Rent or Payment Standard (whichever is less). Overall rents are not restricted to the Fair Market Rents and a tenant is allowed to pay up to 40% of income if they choose a rental property that has a higher rent than the Payment Standard. If the contract rent is increased after the first year and the unit meets Rent Reasonableness, assisted tenants are allowed to pay a higher portion of their income if they choose to remain in the rental property rather than move to a lower cost unit.

Section 202/811 Housing for Elderly or Handicapped Housing

Under this federally administered program, direct loans are made to eligible, private nonprofit organizations and consumer operative sponsors to finance development of rental or cooperative housing facilities for occupancy by elderly or handicapped persons. The interest rates on such loans are determined annually. Section 8 funds are made available for all of the Section 202 units for the elderly. Rental assistance for 100% of the units for handicapped persons has also recently been made available. Section 811 can be used to develop group homes, independent living facilities, and intermediate care facilities.

Private, nonprofit sponsors may qualify for Section 202 no-interest capital financing loans. Households of one or more persons, the head of which is at least 62 years old or is a qualified non-elderly handicapped person between the ages of 18 and 62, are eligible to live in these units.

Housing Opportunities for Persons with AIDS (HOPWA)

The federally administered HOPWA program provides entitlement and competitive grants for housing assistance and supportive services for persons with AIDS. Funds can be used for:

- Acquisition, rehabilitation, lease, and repair of facilities
- New construction
- Project-based or tenant-based rental assistance
- Planning and support services
- Operating costs
- Short-term rent, mortgage, and utility payments
- Administrative expenses

Supportive Housing

The Supportive Housing Programs provide grants to public and private non-profit entities to promote the development of supportive housing and services. These grants are disbursed by HUD. Funds may be used for: acquisition of property; rehabilitation; new construction (under certain limitations); leasing of structures; operating and supportive services costs; and rental assistance.

Federal Emergency Solutions Grants (FESG)

This federal program provides grants to (1) engage homeless individuals and families living on the street, (2) improve the number and quality of emergency shelters for homeless individuals and families, (3) help operate these shelters, (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. Metropolitan cities, urban counties and territories may provide ESG funds to projects operated by units of general-purpose local government or private nonprofit organizations.

b. State Resources and Programs

Affordable Housing and Sustainable Communities Program (AHSC)

This state program is administered by the Strategic Growth Council and implemented by the California Department of Housing and Community Development (State HCD). The AHSC Program funds land-use, housing, transportation, and land preservation projects to support infill and compact development that reduce greenhouse gas (GHG) emissions. Funding for the AHSC Program is provided from the Greenhouse Gas Reduction Fund (GGRF), an account established to receive Cap-and-Trade auction proceeds. The AHSC Program will assist project areas by providing grants and/or loans, or any combination thereof, that will achieve GHG emissions reductions and benefit Disadvantaged Communities through increasing accessibility of affordable housing, employment centers, and key destinations via low-carbon transportation

resulting in fewer vehicle miles traveled (VMT) through shortened or reduced trip length or mode shift from Single Occupancy Vehicle (SOV) use to transit, bicycling, or walking.

CALHOME

CalHome enables low- and very low-income households to become or remain homeowners. Eligible activities include predevelopment, site development, and site acquisition for development projects; rehabilitation and acquisition and rehabilitation of site-built housing, and rehabilitation, repair, and replacement of manufactured homes; and down payment assistance, mortgage financing, homebuyer counseling, and technical assistance for self-help.

California Emergency Solutions And Housing (CESH)

CESH Program provides funds for a variety of activities to assist persons experiencing or at risk of homelessness as authorized by SB 850 (Chapter 48, Statues of 2018). State HCD administers the CESH Program with funding received from the Building Homes and Jobs Act Trust Fund (SB 2, Chapter 364, Statutes of 2017). CESH funds may be used for five primary activities: housing relocation and stabilization services (including rental assistance), operating subsidies for permanent housing, flexible housing subsidy funds, operating support for emergency housing interventions, and systems support for homelessness services and housing delivery systems. In addition, some administrative entities may use CESH funds to develop or update a Coordinated Entry System (CES), Homeless Management Information System (HMIS), or Homelessness Plan.

Golden State Acquisition Fund (GSAF)

GSAF combined with matching funds, makes up to five-year loans to developers for acquisition or preservation of affordable housing.

HOMEKEY

Homekey funds will be made available to purchase and rehabilitate housing, including hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or permanent, long-term housing. Awarded funds must be used to provide housing for individuals and families experiencing homelessness or at risk of experiencing homelessness and who are impacted by the COVID-19 pandemic.

Eligible activities include acquisition or rehabilitation of motels, hotels, or hostels; master leasing of properties; acquisition of other sites and assets, including purchase of apartments or homes, adult residential facilities, residential care facilities for the elderly, manufactured housing, and other buildings with existing residential uses that could be converted to permanent or interim housing; conversion of units from nonresidential to residential in a structure with a

certificate of occupancy as a motel, hotel, or hostel; purchase of affordability covenants and restrictions for units; relocation costs for individuals who are being displaced as a result of rehabilitation of existing units; and capitalized operating subsidies for units purchased, converted, or altered with funds provided pursuant to Health and Safety Code (HSC) section 50675.1.1.

Infill Infrastructure Grant Program (IIG)

The purpose of the IIG Program is to promote infill housing development by providing financial assistance for Capital Improvement Projects that are an integral part of, or necessary to facilitate the development of, a Qualifying Infill Project or a Qualifying Infill Area. To be eligible for funding, a Capital Improvement Project must be an integral part of, or necessary for the development of either a Qualifying Infill Project or housing designated within a Qualifying Infill Area. Eligible costs include the construction, rehabilitation, demolition, relocation, preservation, and acquisition of infrastructure.

Joe Serna, Jr. Farmworker Housing Grants (FWHG)

FWHG funds are to be used to finance the new construction, rehabilitation, and acquisition of owner-occupied and rental units for agricultural workers, with a priority for lower-income households. Activities incurring costs in the development of homeowner or rental housing for agricultural workers, including land acquisition, site development, construction, rehabilitation, design services, operating and replacement reserves, repayment of predevelopment loans, provision of access for the elderly or disabled, relocation, homeowner counseling, and other reasonable and necessary costs are eligible.

Local Early Assistance Program (LEAP)

The Local Early Assistance Program (LEAP) provides grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that accelerate housing production, and /or facilitates compliance to implement the 6th cycle Regional Housing Needs Assessment.

Local Housing Trust Fund (LHTF)

LHTF assistance is to be used to provide matching funds to local and regional housing trust funds dedicated to the creation, rehabilitation, or preservation of affordable housing, transitional housing, and emergency shelters. Eligible Activities include Loans for acquisition, predevelopment expenses and development of affordable rental housing projects, transitional housing projects, emergency shelters and homeownership projects, including down payment assistance to qualified first-time homebuyers, and for rehabilitation of homes owned by income-eligible homeowners. No more than 20% of each allocation may assist moderate-income

households, and at least 30% of each allocation is required to assist extremely low-income households.

Multifamily Housing Program (MHP)

MHP funds are to assist the new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower-income households. Senate Bill 3 (Chapter 365, Statues 2017) authorized the Veterans and Affordable Housing Bond Act of 2018 (Proposition 1). This measure was adopted by voters on November 6, 2018. It authorizes the issuance of bonds in the amount of $1.5 billion for the Multifamily Housing Program (MHP). California Department of Housing and Community Development (HCD) has developed draft MHP guidelines and is seeking feedback from stakeholders and interested parties.

Eligible Activities include new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing, and the conversion of nonresidential structures to rental housing. Projects are not eligible if construction has commenced as of the application date, or if they are receiving 9% federal low-income housing tax credits.

MHP funds will be provided for post-construction permanent financing only. Eligible costs include the cost of child care, after-school care, and social service facilities integrally linked to the assisted housing units; real property acquisition; refinancing to retain affordable rents; necessary on-site and off-site improvements; reasonable fees and consulting costs; and capitalized reserves.

National Housing Trust Fund (NHTF)

NHTF funds assist in new construction of permanent housing for extremely low-income households. Eligible activities are to be used for new construction. Applicants include individuals, joint ventures, partnership, limited partnerships, trusts, corporations, limited liability corporations, local public entities, duly constituted governing body of Indian Reservations or Rancherias or other legal entities or any combination thereof that meet program requirements.

Pet Assistance And Support Program (PAS)

PAS provides funding for qualified homeless shelters to provide shelter, food, and basic veterinary services for pets owned by individuals experiencing homelessness, along with staffing and liability insurance related to providing those services. Eligible uses include shelter, food, and basic veterinary services for pets owned by individuals experiencing homelessness, along with staffing and liability insurance related to providing those services.

Permanent Local Housing Allocation (PLHA)

The purpose of PLHA funds is to provide a permanent source of funding to all local governments in California to help cities and counties implement plans to increase the affordable housing stock. Funds will help to increase the supply of housing for households at or below 60% of area median income; increase assistance to affordable owner-occupied workforce housing; assist persons experiencing or at risk of homelessness; facilitate housing affordability, particularly for lower- and moderate-income households; promote projects and programs to meet the local government's unmet share of regional housing needs allocation; and ensure geographic equity in the distribution of the funds.

Regional Early Action Planning Grants (REAP)

This program allows councils of governments (COGs) and other regional entities to collaborate on projects that have a broader regional impact on housing. Grant funding is intended to help regional entities and governments facilitate local housing production that will assist local governments in meeting their Regional Housing Need Assessment (RHNA).

TRANsitional Housing Program (THP)

When left without support or resources, young adults aged 18 to 25 years ("transition age youth") can face huge barriers to finding safe, affordable homes. As a result, many of these youth are at extreme risk of falling into homelessness. THP provides funding to counties for child welfare services agencies to help young adults aged 18 to 25 years find and maintain housing, with priority given to those formerly in the foster care or probation systems. (SB 80, Statutes of 2019). Funds shall be used to help young adults who are 18 to 25 years of age secure and maintain housing. Use of funds may include, but are not limited to, identifying, and assisting housing services for this population within each community; helping this population secure and maintain housing (with priority given to those formerly in the state's foster care or probation system); improving coordination of services and linkages to community resources within the child welfare system and the Homeless Continuum of Care; and outreach and targeting to serve those with the most-severe needs.

Veterans Housing And Homelessness Prevention Program (VHHP)

VHHP funds are to be used for acquisition, construction, rehabilitation, and preservation of affordable multifamily housing for veterans and their families to allow veterans to access and maintain housing stability. Funds must be used to serve veterans and their families with at least 50% of the funds awarded shall serve veteran households with extremely low-incomes. Of those units targeted to extremely low-income veteran housing, 60% shall be supportive housing units.

California Housing Finance Agency (CalHFA)

CalHFA offers a variety of loan programs with competitive rates and long-term financing to advance the creation and preservation of affordable housing.

- Permanent Loan Program: CalHFA's Taxable, Tax-Exempt, or CalHFA funded Permanent Loan programs provide competitive long-term financing for affordable multifamily rental housing projects. Eligible projects include newly constructed or acquisition/rehabilitation developments that provide affordable housing opportunities for individuals, families, seniors, veterans, and special needs tenants.

- Conduit Issuer Program: The Conduit Issuer Program is designed to facilitate access to tax-exempt and taxable bonds by developers that seek financing for eligible projects that provide affordable multifamily rental housing for individuals, families, seniors, veterans, or special needs tenants. The conduit bonds may be used to finance the acquisition, rehabilitation, and/or development of an existing project, or they can be used for the construction of a new project.

- Mixed-Income Program: The CalHFA Mixed-Income Program provides competitive long-term subordinate financing for new construction multifamily housing projects restricting units between 30% and 120% of county Area Median Income.

CalHFA offers a variety of loan programs to help California residents purchase a home.

  - California Dream For All Shared Appreciation Loan: The Dream For All Shared Appreciation Loan is a down payment assistance program for first-time homebuyers to be used in conjunction with the Dream For All Conventional first mortgage for down payment and/or closing costs.

Low-Income Housing Tax Credit (LIHTC) Program and Tax-Exempt Bond Financing

The LIHTC financing program subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low- and moderate-income tenants. Through the tax credit program, private investors make cash investments in return for reductions in tax liabilities from the state and/or federal government. The 9% tax credit program is highly competitive and is combined with taxable hard debt. The 4% tax credit program is combined with tax-exempt bonds, which now has a competitive process for the allocation. This is a complex and competitive financing program, but critical to the long-term financing of affordable/supportive housing developments. Typically, 30% to 50% of total funding needed for a housing development is provided through the federal and state LIHTC financing programs. Local funding must be contributed in order for developers to be competitive in obtaining tax credit and bond financing.

According to the California Tax Credit Allocation Committee, there are 175 LIHTC developments in Orange County, some of which are designated for specific populations. These developments include 15,092 low-income units, with 2 reserved for At-Risk populations, 79 for large families, 30 Non-Targeted, 46 for Seniors, 8 for Special Needs populations, 4 Single Room Occupancy (SRO), and 6 which are not categorized. There are no active LIHTC developments in La Habra, Laguna Niguel, or Rancho Santa Margarita.

California Mental Health Services Act (Proposition 63 of 2004)

The passage of Proposition 63 (now known as the Mental Health Services Act or MHSA) in November 2004, provides the first opportunity in many years for the California Department of Mental Health (DMH) to provide increased funding, personnel and other resources to support county mental health programs and monitor progress toward statewide goals for children, transition age youth, adults, older adults and families. The Act addresses a broad continuum of prevention, early intervention and service needs and the necessary infrastructure, technology and training elements that will effectively support this system.

This Act imposes a 1% income tax on personal income in excess of $1 million. Statewide, much of the funding is provided to county mental health programs to fund programs consistent with their local plans. MHSA funding has been approved to facilitate development, acquisition, or rehabilitation of permanent supportive housing for the target population.

c. Local and Private Resources and Programs

Redevelopment Tax Increment Funds

On December 29, 2011, the California Supreme Court (the Court) issued its opinion in *CRA v. Matosantos*, regarding the constitutionality of AB1X 26 & 27. In their opinion, the Court upheld the provisions of AB1X 26, effectively eliminating redevelopment agencies statewide, but struck down AB1X 27 the legislation that would have allowed redevelopment agencies to continue so long as they provided payments to the State. Pursuant to California Health & Safety Code Section 34170 et seq., the Orange County Development Agency was officially dissolved on February 1, 2012. As a result of that action, redevelopment funds are no longer available as leverage for use with CDBG and/or HOME funds. A Housing Successor Agency (HSA) was established to wind down all remaining financial obligations of the Orange County Development Agency (OCDA).

Affordable units produced or substantially rehabilitated through support by the former Orange County Development Agency's Housing Set Aside Fund from 2006 to 2020 are identified in **Table 5-4**:

Table 5-4
Affordable Housing Assisted with Former OCDA Funds – 2006-2020

Project Description	OCDA Restricted Units	Total New Units Produced
Cornerstone Apartments	37	48
Bonterra Apartment Homes	82	94
Stonegate I Apartments	27	38
Stonegate II Apartments	15	38
Avenida Villas	17	29
Dorado Senior Apartments	103	150
Montecito Vista Apartments	11	162
Stratford Place and Windsor Court	85	86
Granite Court Apartments	24	71
Woodbury NE Apartments	62	150
Buena Vista Apartments	17	17
Potter's Lane	15	15
Placentia Veterans Village	24	24
Della Rosa	24	50
Oakcrest Heights	3	54
Salerno at Cypress Village	25	25
Total	**571**	**1,051**

Source: OC Community Resources, 2023

Based on the uncertainty of the HSA funds, and the ability to monitor and maintain the existing HSA assets, it is unknown how many new affordable units will be created through HSA funds in the future.

Building Industry Association/HomeAid Program

HomeAid Orange County was established in 1989 by the Orange County Chapter of the Building Industry Association of Southern California with the mission to end homelessness through the development of shelters, advocacy, and service for persons experiencing homelessness. In the last 25 years, HomeAid has developed 50 shelters adding more than 1,000 beds and changed the lives of more than 50,000 people who have experienced homelessness.

Kennedy Commission

The Kennedy Commission is a community-based non-profit formed in 2001 as an all-volunteer organization. The focus of this group is to develop housing solutions that affirm the dignity of

families with very low- and extremely low-incomes and unites communities across Orange County to develop homes affordable to all.

Orange County Housing Trust (OCHT)

OCHT is a fully qualified 501(c)(3) nonprofit private capital-funded trust dedicated to increasing the supply and availability of permanent supportive housing units and affordable housing developments in Orange County to prevent homelessness. With renewed interest to solve the homelessness crisis in Orange County, Orange County Business Council approached NeighborWorks Orange County to work together to retool OCHT and seek donations from the private sector interested in making a difference. Their focus is to provide gap financing for the acquisition, development, or construction of supportive and affordable housing projects for developers who share our vision of ending homelessness in Orange County. In March 2023, the OCHFT was awarded a $4 million grant from CalOptima Health for the purpose of creating and operating an ADU Loan program. The program is designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences in aims to expand access to income opportunities for homeowners while also providing much needed affordable rentals exclusively for very low-income tenants with a priority on Section 8 voucher holders.

Housing Funding Strategy

The 2018 Orange County Housing Funding Strategy (2018 Strategy) outlines a bold vision of the creation of 2,700 supportive housing units over seven years (through 2025) as well as a need to create additional affordable housing. Investments in housing developments throughout Orange County have been an urgent priority and there has been catalytic investment in supportive housing opportunities over the last four years.

In December 2022, the Board received and filed the 2022 Orange County Housing Funding Strategy Update (HFS Update) which is based on the 2022 Point In Time (PIT) Count and maps out the progress that has been made toward the 2,700 unit goal under the 2018 Strategy, as well as provides an analysis of federal, state, and local resources available to produce affordable and supportive housing. The HFS Update further outlines the recommendations for a strategic approach to achieve an updated goal of developing 2,396 supportive housing units from 2022 to 2029. Orange County's strategic responses to homelessness and the California housing crisis is seen in the considerable progress that has been made in supportive and affordable housing production locally. In addition, the HFS Update provides an overview of current development costs, which rose significantly over the last four years, as well as the success of the County in leveraging of locally invested resources to create new supportive housing as well as general affordable housing in the region.

Orange County Housing Finance Trust (OCHFT)

The Orange County Housing Finance Trust (OCHFT) was formed in 2019 as a joint powers authority between the County of Orange and the cities throughout the county. OCHFT was created for the purpose of funding housing, specifically assisting persons experiencing homelessness and persons and families of extremely low-, very low-, and low-income within the Orange County.

Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family size and requires U.S. citizenship and specified categories of non-citizens who have eligible immigration status. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live. By law, a PHA must provide 75 % of its voucher to applicants whose incomes do not exceed 30 % of the area median income. Median income levels are published by HUD and vary by location.

County's Mortgage Assistance Program

The County's Mortgage Assistance Program (MAP) provides silent (deferred payment) down payment assistance loans to assist low-income first-time homebuyers (FTHB). Eligible FTHB's annual income must not exceed 80% of the Area Median Income (AMI). The loans are designed to help with the down payment to purchase a home. The 3% simple interest, deferred payment loan has a 30-year term and a maximum loan amount of $80,000. Homebuyers must occupy the property as their primary residence. There is a 1% minimum down payment requirement for this program and the total sales prices shall not exceed 85% of the Orange County median sales price for all homes. All applicants are required to attend a homebuyer education workshop. This program is available to eligible families in the Unincorporated County areas and in several participating cities.

Updated MAP policies and guidelines were approved by the Board of Supervisors on August 25, 2020. Eleven (11) households received a loan from the MAP during the 2013-2021 planning period.

Summary of Quantified Objectives

The following tables summarize the quantifiable objectives arising from the various programs.

1. New Construction

The County's quantified objectives for new construction are shown in **Table 5-5** and reflects the remaining RHNA after accounting for projects developed or under development, RHNA transfers, and projected ADU development. It should be noted that achievement of these

objectives will be dependent on many factors beyond the County's control, such as funding availability, interest rates, and general economic conditions.

Table 5-5
New Construction
Quantified Objectives Summary 2021-2029

Program	Extremely Low	Ex/Very Low	Low	Moderate	Above Moderate	Total
Objective	1,435 units	1,435 units	1,624 units	1,842 units	1,786 units	8,122 units

2. Rehabilitation

The County's rehabilitation program was inactive during 2014-2022. OC Community Resources is continuing to work towards the development of a new single-family rehabilitation program for Unincorporated Orange County.

3. Preservation/Assistance

The County's objectives for preservation and assistance programs are shown in **Table 5-6**.

Table 5-6
Preservation and Assistance
Quantified Objectives Summary, 2021-2029

Program	Extremely Low	Very Low	Low	Moderate	Above Moderate	TOTAL
Continuum of Care (CoC)[1]	526	45	0	0	0	571
Housing Choice Vouchers (HCV)[1]	10,065	32	0	0	0	10,097
TOTAL	**10,591**	**77**	**0**	**0**	0	**10,668**

[1]CountywideSource: OC Community Resources 2021. Projected number of occupancy units is the average between projected and actual active CoC and HCV Program participants from the previous period (2013-2021).

APPENDIX A: EVALUATION OF THE 2013-2021 HOUSING ELEMENT

Section 65588(a) of the *Government Code* requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This appendix contains a review the housing goals, policies, and programs of the previous Housing Element and evaluates the degree to which these programs have been implemented during the previous planning period, 2013 through 2021. The findings from this evaluation have been instrumental in determining the County's Housing Action Plan.

A. Program Evaluation

Table A-1 summarizes the County's accomplishments in implementing the programs contained in the previous Housing Element. **Table A-2** shows units built from January 1, 2013 through December 2021. Accessory dwelling units and market-rate apartments have been assigned to the low-income category based on prevailing rents. **Tables A-3** and **A-4** summarize the County's progress in meeting the quantified objectives from the previous Housing Element. For new construction, only units with affordability covenants have been included in the very low and low categories.

Special Needs Accomplishments

The County of Orange has demonstrated a significant effort in working towards accomplishing many of the objectives set for the programs of the past cycle. During the 5th Cycle, the County completed a number of key programs to support housing opportunity and made substantial progress towards many of its programs. The County's successful programs have been identified as continued or modified for the 6th Cycle, due to their success in the 5th Cycle.

As a part of analyzing prior programs, the element must provide an explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations. The County's prior program accomplishments, achievements related to special needs populations are summarized below:

Seniors

According to recent American Community Survey estimates, there were 27.4% of owner households and 16.3% of renter households in Unincorporated Orange County where the householder was 65 or older. The housing needs of this group can be addressed through smaller units, accessory dwelling units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs.

Senior housing projects are a permitted use within any residential zoning district. The Zoning Code also provides a density bonus for the construction of senior housing projects.

Additionally, the Section 8 Housing Choice Voucher Programs (administered by the Orange County Housing Authority or OCHA) and Continuum of Care/Shelter Plus Care Certificate Grants provide monthly housing assistance payments to owners of rental properties in order to assist extremely low and very low-income families, elderly, and disabled persons with their rent. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.

Persons with Disabilities

As shown in Section 2, disabilities are relatively rare within Orange County in the under 65 age groups – typically 2% or less of the population. However, among seniors the incidence of disabilities increases significantly. Nearly 18.7% of persons in this age group reported an ambulatory difficulty, while more than 14% had an independent living difficulty.

The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.

Large Households

Large households are defined as those with five or more members. About 16% of renter households and about 15% of owner households within Unincorporated Orange County had five or more members. This data, together with overcrowding statistics, indicates that although a large proportion of households are small, there is a significant need for large rental units with four or more bedrooms.

Orange County worked with developers during the 5th Cycle to identify constraints and discuss strategies to incorporate large family units. Additionally, the County worked with developers to identify constraints to providing family units and how best to address them. The Orange County Housing Opportunities Overlay Zone provides incentives for the development of affordable housing on commercial sites in the Unincorporated County by providing administrative approval of entitlements and by-right development.

Farm Workers

As previously discussed, farm workers are not a significant portion of the Unincorporated Orange County community. Recent Census Bureau estimates reported about 5,000 persons employed in agricultural occupations in Orange County. About 6% of those farm workers live in Unincorporated County areas.

Their needs are accommodated through housing programs and policies that assist lower-income households in general rather than specialized programs, such as:

- Strategy 2a (rehabilitate deteriorated units). The County utilizes Federal Community Development Block Grant (CDBG) and State CalHome Funds to assist low-income households with needed repairs to their homes.
- Strategy 1a (encourage affordable housing opportunities). The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.
- Strategy 1f (support development of permanent supportive and transitional housing).

Single-Parent Households

For Orange County as a whole, single parents represent 5.2% of householders, according to 2019 ACS 5-Year Estimates. There are 41,777 single-mother households and 12,508 single-father households in Orange County (4% and 1.2%, respectively).

The County amended its Housing Opportunities Overlay Zone regulations in 2009 to provide incentives for the inclusion of child care facilities within affordable housing developments.

Single-room occupancy (SRO) units often provide a more affordable housing option for single-parent households which shared facilities to cut down on expenses and other costs. One SRO-type facility has been built in the Unincorporated County areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Persons Experiencing Homelessness

The County has estimated the number of homeless persons in the Unincorporated County areas based on the data collected in the 2019 Point-In-Time (PIT) Count. As of 2019, there were approximately 43 individuals experiencing homelessness in the Unincorporated County areas, in shelter programs and on the streets and places not meant for human habitation.

- The County achieved the following milestones within the County's 10-Year Plan to End Homelessness (Ten-Year Plan):In May 2016, the Board of Supervisors created the Office of Care Coordination to engage the entire Orange County region by working with cities and community-based organizations to coordinate public and private resources to meet the needs of the homeless population in Orange County and improve the overall countywide response to homelessness. October 2016, the Director of Care Coordination produced an Assessment of Homeless Services in Orange County that outlined findings, recommendations, and next steps for Orange County. This Assessment served as the next steps and measured the progress to date of the Ten-Year Plan.
- In April 2018, the Director of Care Coordination presented an update to the Assessment of Homeless Services in Orange County and provided next steps to building the County's System of Care, which promotes regional collaboration and coordination to meet the unique needs of people experiencing homelessness in Orange County.
- In November 2019, the Board approved a re-organization that consolidated the Office of Care Coordination and the Homeless Services unit into one, allowing for the better operationalization of policy to effectively address homelessness.
    - As of January 2021, a network of nonprofit organizations and local governments operates 59 emergency shelter programs (including those operating in response to COVID-19), 42 transitional housing programs, and 31 permanent supportive housing programs within the Orange County region. Specifically, the County, individual jurisdictions, and numerous agencies oversee a total of 2,857 beds in emergency shelters, 899 beds in transitional housing shelters and 2,602 beds in permanent supportive housing settings. Currently, 646 permanent supportive housing and affordable housing units are under development.

Unlike cities, the County plays a regional role in providing services to persons and families experiencing homelessness. The County-contracted facilities, such Bridges at Kraemer Place and the Yale Navigation Center that provides emergency shelter for adults experiencing homelessness, is located outside of the County's jurisdictional boundary but serves individuals from throughout the County, including the Unincorporated areas. In addition, the Orange County

Office of Care Coordination coordinates the grant application process through which local homeless service providers receive over $23 million in federal funding annually for the Continuum of Care Program. The Orange County Office of Care Coordination also serves as the administrative entity for the Orange County Continuum of Care for State funding to address homelessness.

Additionally, the County funds the operations of two year-round emergency shelter programs for individuals experiencing homelessness, Bridges at Kraemer Place, and the Yale Navigation Center. Bridges at Kraemer Place provides 200 beds of emergency shelter in the North Service Planning Area and the Yale Navigation Center provides 425 beds of emergency shelter in the Central Service Planning Area. Both programs have a large emphasis on housing focused case management and supporting participants in accessing needed resources and supportive services to assist them in securing appropriate housing options. The County is committed to supporting cities that operate their own emergency shelters and promoting coordination to increase access to shelter beds amongst the unsheltered population. There is one year-round program located in the Unincorporated County. American Family Housing leases space to the Illumination Foundation for the provision of 18 transitional housing units in Midway City.

Extremely low-income households

To calculate projected housing needs of the 6th Cycle, jurisdictions are to assume 50% of its very low-income regional housing need are extremely low-income households. As a result, from the very low-income need of 46,416 units, Orange County as a whole, has a projected need of 23,208 units for extremely low-income households. The projected need for low-income households in the Unincorporated County areas is 3,107. Thus, applying this same assumption to the Unincorporated County areas, the projected need for extremely low-income households is 1,554.

The Housing Action Plan Strategy addresses the needs of extremely low-income households. However, it must be recognized that the development of new housing for the lowest income groups typically requires large public subsidies, and the level of need is greater than can be met due to funding limitations, especially during these times of declining public revenues.

In June 2018, the Board of Supervisors approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board of Supervisors also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in Mental Health Services Act (MHSA) funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built, 816 units

under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of over 2,700 supportive and affordable housing units throughout the county by 2025.

One Single Room Occupancy (SRO)-type facility has been built in the Unincorporated County areas in recent years – Jackson Aisle in Midway City. This project was facilitated through a density bonus and the modification of development standards including a reduction in the minimum land area per unit (from 1,000 to 342 square feet), reduction in setbacks, and reduced off-street parking. All of the units in this project are affordable at the extremely low-income level.

Housing Opportunities Overlay Zone

The Housing Opportunities Overlay Zone (HOO) regulations have been in effect since February 2006. The HOO initially allowed multifamily residential development by-right at a density of 25 units per acre, excluding density bonus, in commercial and industrial zoning districts. Since that time, eight multifamily projects with a total of 421 affordable units have been approved under the HOO regulations (see **Table B-1** for project details). In order to encourage use of HOO development opportunities, Implementation Action 1a. of the previous Housing Element called for expansion of the HOO to include parcels conventionally zoned for multifamily (i.e., R2, R3, R4 and RP). The Zoning Code amendment for that expansion was adopted by the Board of Supervisors on December 9, 2008. In 2020, the HOO was amended again to increase the base density to 43.5 units per acre on eligible parcels. In September 2022, the HOO was amended again to increase the base density from 43.5 to 70 units per acre, excluding any applicable density bonus units.

B. Progress in Meeting Quantified Objectives

Tables A-2 through **A-5** summarize the County's progress in meeting the quantified objectives from the previous Housing Element.

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
1. New Housing Production			
Strategy 1a. Establish affordable housing production as one of the County's highest priorities.	Maintain and expand affordable housing as a priority for the County.	The County successfully aided in the development of affordable housing units across Unincorporated Orange County throughout the 5th Cycle. In 2014, the Board approved Notices of Funding Availability (NOFA) for project-based vouchers and funding remained open throughout 2019 to assist in the development of supportive housing throughout Orange County. As shown in Table 2-35, a total of 21 affordable housing projects constructed between 2020 and 2023 were funded in part or in whole through the 2020 NOFA. These affordable housing developments funded through the 2020 NOFA include 1,318 housing units which span multiple levels of affordability from 20% up to 80% of AMI. 1. In December 2019 the Board authorized issuance of the 2020 Supportive Housing NOFA for funding and project-based vouchers to facilitate the development of permanent supportive housing throughout Orange County, including Unincorporated areas. OCCR released the 2020 NOFA on January 27, 2020, making $10 million in Mental Health Services Act (MHSA) funds, $3 million in Home Investment Partnership Act (HOME) and Housing Successor Agency (HSA) funds and 200 Housing Choice Project-Based Vouchers (PBVs) available for the development of supportive housing units. The Board approved increases to the NOFA in funding and vouchers to accommodate funding additional projects. The 2020 NOFA is an open process and applications are accepted on a first-come, first-served basis. HCD received 15 applications requesting 307 PBVs and approximately $18.2 million in combined requests. In March 2023, the Board authorized the issuance of the 2023 Supportive Housing NOFA for funding and project-based vouchers to facilitate the development of supportive housing throughout Orange County, including Unincorporated areas. 2. In March 2019, the Board approved the Orange County Housing Finance Trust (OCHFT) Joint Powers Agreement to facilitate the development of permanent supportive housing in Orange County. The County is a member of the OCHFT along with 23 Orange County Cities. In January 2020, OCHFT Board approved issuance of the 2020 Permanent Supportive Housing NOFA. In May 2020, the OCHFT received a five-year commitment for a total of $ 20.5 million in County Mental Health Services Act funds and a five-year commitment of County General Fund in the total amount of $5 million. Those funds are to be used as sources of matching funds for the Local Housing Trust Fund Program (LHTF). In August 2020, OCHFT applied for LHTF. In October 2020, the OCHFT received notification of an award of more than $4 million for development of permanent supportive and affordable housing units. As shown in Table 2-35, those funds have supported the development of approximately 22 affordable housing projects, including approximately 1,404 housing units between 2020 and 2023.	The County found this program to be successful and has revised this strategy to further encourage housing production through various programs in the Housing Action Plan Programs 1, 2, 3, 4, 5, 7, and 10.

Table A-1
Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
		3. OC Public Works, in collaboration with OC Community Resources, received $310,000 of SB2 Planning Grant funds to create various administrative documents that will help establish and promote the newly formed Orange County Housing Finance Trust (OCHFT), and create the first OCHFT business/strategic plan, a website that provides valuable information for the region regarding the OCHFT activities and create a Notice of Funding Availability document to award funds tom developers for the creation of affordable and permanent supportive housing. In addition, the grant funds were used for the Comprehensive Zoning Code Update (adopted by the Board of Supervisors2020) to incorporate current trends in planning and development and comply with State of California law. OC Public Works also received $500,000 in LEAP funds to update the housing element and prepare other documents to accelerate housing production. 4. Home Investment Partnership Program (HOME), Housing Successor Agency or Mental Health Services Act/Special Needs Housing Program and No Place Like Home funds were made available during the reporting period to support affordable housing projects. Collectively, these funds assisted in the development of approximately 22 housing projects, totaling approximately 1,404 housing units between 2020 and 2023. Orange County continues to pursue opportunities to obtain housing grant funds to assist in the development of affordable housing. 5. In June 2018, the Board approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in MHSA funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built 816 units under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of 2,700 supportive and affordable housing units throughout the county by 2025. The units completed to date represent a completion of 84% of the goal. The County will continue working to complete the remaining 16% of this goal during the current planning period.	
	Facilitate the production of affordable units by offering incentives such as density bonus, expedited permit processing,	The County successfully provided incentive opportunities for affordable housing throughout the 5th Cycle. Orange County continued to provide expedited processing and density bonus incentives to affordable housing projects, along with fee or permit waivers, and where appropriate, parking requirement and setback reductions and increased lot coverage and	

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Housing Element Program Evaluation
County of Orange – 2013-2021

Strategy	Action	Accomplishments	6th Cycle Status
	modifications to development standards, tax-exempt conduit financing, infrastructure financing assistance and direct financial assistance in exchange for a proportional commitment to provide units at affordable prices or rents.	building height. The County adopted an ordinance to allow the deferral of development impact fees and to exempt affordable housing projects from local park fees.	
	Work cooperatively with other governmental agencies, business groups, universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County's long-term viability.	The County successfully partnered with multiple agencies throughout the 5th Cycle. OC Community Resources continued to work cooperatively with numerous agencies and organizations to increase public awareness of the importance of affordable housing to the County's long-term viability. As just a few examples, the County created and provided funding for the OC Housing Finance Trust and continued to serve as the regional coordinator for the OC Office of Care Coordination, including hosting fair housing trainings and adopting a Housing Finance Strategy to increase the numbers of supportive housing units, during the planning period.	
	Aggressively pursue all state and federal housing grant funds for which the County is eligible.	Orange County received funds from the SB 2 Planning Grant Program, Local Early Action Planning (LEAP) Program, and Covid ESG and Covid CDBG funds during the reporting period. Orange County continues to pursue housing grant funds. These funding sources are used to fund programs identified in the County's Consolidated Plan, adopted in 2020, throughout the Unincorporated areas, and in the incorporated jurisdictions of Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, San Juan Capistrano, Seal Beach, Stanton, Villa Park, Placentia, and Yorba Linda. The Consolidated Plan prioritizes funding that specifically addresses housing cost-burden, affordable housing stock, funding public infrastructure and facilities in low- and moderate-income neighborhoods, and to fund projects to meet the needs of people with disabilities and those of seniors. The Consolidated Plan's performance is reviewed and evaluated annually to ensure that it continues to allocate available housing grant funds to projects which prioritize the needs of the lower-income and special needs communities within Orange County as a whole.	

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Strategy	Action	Accomplishments	6th Cycle Status
Strategy 1b. Ensure that new large-scale development includes a sufficient range of housing types and densities in appropriate locations to facilitate the production of housing for all economic segments consistent with the County's quantified objectives.	Coordinate the location of major housing developments, particularly affordable housing, and multifamily units, with existing and proposed highway and transit routes, major employment centers, shopping facilities and other services. (see Appendix B)	The eight affordable housing projects built since 2006 are located on or adjacent to transportation corridors. For example. Stonegate I and Stonegate II are fully affordable projects located on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 2, 3, 4.
	Establish affordable housing at the Very low-income level as a priority in negotiating development agreements for new planned communities, or renegotiating existing development agreements.	The County continues to negotiate development agreements for new planned communities. The provision of affordable housing will be encouraged in any future negotiated development agreements. However, no new development agreements were negotiated during the planning period.	
	Work with cities and LAFCO to ensure that new planned communities in sphere of influence areas provide adequate sites at appropriate densities for affordable housing.	The County successfully facilitated the development of new affordable housing units throughout the 5th Cycle. Rancho Mission Viejo Planning Area 3 –commenced development during the planning period. As a condition of approval, 60 acres of land will be dedicated to the County for affordable housing development. To date, Rancho Mission Viejo has constructed 107 affordable dwelling units in Planning Area 1 and 112 affordable dwelling units in Planning Area 2. Seventy percent (70%) of these units are reserved for low-income households and 30% are reserved for very-low-income households. Pursuant to Addenda No. 1 (2013) and No. 2 (2016) of the AHIA, Rancho Mission Viejo has satisfied 15.6 acres of the required 60 acres. Planning Area 3, which is currently under development, is anticipated to satisfy 26.4 acres of land for affordable housing.	
	To assist the development of housing for lower-income households on larger sites, the County will facilitate parcel maps and/or lot line adjustments resulting in parcel sizes that facilitate multifamily developments affordable to lower-income households in light of state, federal and local financing programs (i.e., 2-10 acres). The County will	Orange County will continue to provide information regarding potential sites available for the development of affordable housing projects. During the planning period, the County developed informational handouts regarding Accessory Dwelling Units/Junior Accessory Dwelling Units, as well as Affordable Housing Development Preliminary Applications to highlight opportunities for development of housing for lower-income households and to ease the application and permitting process for applicants. Additionally, the County developed an SB9 Guidance Document, which provides information on additional opportunities for owners of larger lots to both split their lots and develop additional housing on existing lots through a streamlined approval process and presents an opportunity for the development of additional affordable housing units on both smaller and larger than average parcel sizes. The County also offered the following incentives to affordable housing	

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Housing Element Program Evaluation
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Strategy	Action	Accomplishments	6th Cycle Status
	work with property owners and affordable housing developers to target and market the availability of sites with the best potential for development. In addition, the County will offer incentives for the development of affordable housing.	developers: density bonuses, fee reductions or waivers, reduced parking space and setback, increased lot coverage and building height, and expedited permit processing.	
Strategy 1c. Work with cities, community organizations and neighborhood groups to facilitate redevelopment and infill housing development in conjunction with neighborhood revitalization and annexation of Unincorporated islands.	Continue to review Unincorporated islands and identify priority areas with the highest potential for affordable housing development and annexation. (See Appendix C.)	In 2010, the Orange County Local Agency Formation Commission (LAFCO) developed the "Unincorporated Islands Incentive Program and Strategy Handbook" to facilitate annexation of Unincorporated islands. The implementation of that guidance for the annexation of Unincorporated islands resulted in the annexation of a substantial portion of Unincorporated areas into incorporated jurisdictions during the planning period.	The County found that this program was insufficiently specific to adequately quantify achievements; therefore, this strategy has been replaced with Program 4.
Strategy 1d. Ensure that the County's policies, codes, development review procedures and fees do not represent unjustified constraints to the development of new housing.	Continue to support the Development Processing Review Committee in reviewing existing and proposed codes, procedures, and fees to ensure that they do not unreasonably hinder housing production.	The Orange County Development Processing and Review Committee (DPRC), made up on development stakeholders, continues to review and work with County staff to modify, if necessary, application and permit review and approval processes. The County successfully supported the DPRC in reviewing permitted fees and review processes throughout the 5th Cycle.	The County found this program to be successful and has revised this strategy to further encourage housing production through Program 2.
	Amend the Zoning Code provisions regarding accessory dwelling units in conformance with state law (AB 1866).	In accordance with the October 2019 passage of AB 68, AB 881, AB 587, AB 671 and SB 13, the Board of Supervisors adopted the Comprehensive Zoning Code Update, which addresses the requirements on ADUs, making the process ministerial and less restrictive to homeowners. The County successfully adopted the Comprehensive Zoning Code Update to address ADUs in the 5th Cycle and, as such, this action is complete.	
Strategy 1e. Pursue policy changes at the state level to remove barriers to the production of affordable housing.	Seek concurrence from the Department of Housing and Community Development that affordable units built in cities and assisted with County funds should be partially credited toward the	The County successfully coordinated 2 RHNA Transfer Agreements throughout the 5th Cycle, as well as developed a policy on pursuing future RHNA Transfers. A mutually agreed upon RHNA Transfer Agreement between the City of Santa Ana and the County of Orange for the transfer of twenty (20) very low-income units, and twenty-two (22) moderate-income units was approved by the Southern California Association of Governments in June 2021.	The County found this strategy to be successful and will continue to pursue RHNA Transfers. In addition, because the County found this program to be successful, the County has revised this strategy to

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Strategy	Action	Accomplishments	6th Cycle Status
	County's housing production for RHNA purposes in proportion to the amount of County funding.	Another mutually agreed upon RHNA Transfer Agreement between the City of Placentia and the County of Orange for the transfer of twelve (12) very low-income units, and twelve (12) moderate-income units was approved by the Southern California Association of Governments in July 2021. The County of Orange developed a policy on pursuing RHNA Transfers related to annexations, acquisitions and affordable housing projects funded by the County, and will continue to implement that policy going forward.	further encourage housing production through Programs 3 and 4.
	Aggressively pursue tax-exempt bond and low-income tax credit allocations to ensure that Orange County receives its fair share of statewide funding under these programs.	Orange County staff continues to work with developers on a project-by-project basis to leverage County resources to compete for available tax credits and funding from the State.	
	Support legislative reform to strengthen anti-NIMBY laws and to reduce the chilling effect of defect litigation on multifamily and condominium housing production.	Orange County staff continues to monitor legislation that may increase obstacles to affordable housing development, and to support or oppose legislation as appropriate.	
	Support changes to the California Environmental Quality Act that would allow streamlined procedures in urbanized Unincorporated areas similar to those available in cities.	Orange County staff will continue to monitor legislation that may streamline CEQA procedures for projects in the Unincorporated areas, and to support legislation as appropriate.	
Strategy 1f. Ensure that family units are encouraged in new affordable housing development, particularly for large families.	Encourage developers seeking development agreements to include family rental housing as a part of the developments proposed. Seek the goal that 10% of new rental units will be for large families.	The provision of affordable housing will be encouraged in any future negotiated development agreements. No new development agreements were negotiated during the planning period.	The County found that this program to be successful and has revised this strategy to encourage housing production through Programs 3 and 4.
	Continue to support County funding criteria to encourage the	Large family units will continue to be accommodated as appropriate.	

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Strategy	Action	Accomplishments	6th Cycle Status
	addition of large family units in new construction projects.		
	Develop new financial and/or site standard incentives to encourage affordable housing developers to provide units for large families.	Orange County continues to work with developers to identify constraints to providing family units and how best to address them through the Development Processing Review Committee (DPRC) and on a project-by-project basis. The Orange County Housing Opportunities Overlay Zone provides incentives for the development of affordable housing on commercial and industrial sites in the Unincorporated County by providing administrative approval of entitlements and by-right development.	
	Solicit assistance from affordable housing developers and advocates in identifying potential constraints to the development of family units, including current standards for traffic maintenance, parking ratios or other potential development standards, and submit suggested actions to the DPRC for review.	Orange County continues to work with developers to identify constraints and discuss strategies to incorporate large family units. This includes the County's coordination with developers through the Development Processing Review Committee (DPRC) to identify barriers to development that appear in the development permit process and to address those barriers.	
2. Rehabilitation and Preservation of Existing Neighborhoods			
Strategy 2a. Continue to support programs designed to rehabilitate deteriorated units and encourage the maintenance and minor repair of structurally sound housing units to prevent their deterioration.	Continue to use redevelopment agency housing set-aside funds, federal HOME funds, and other available funding to finance housing rehabilitation.	The County successfully used federal and state funding to assist local households and low-income households throughout the 5th Cycle. The County utilizes Federal Community Development Block Grant (CDBG) and State CalHome Funds to assist low-income households with needed repairs to their homes. The County is continuing to work towards the development of a new single-family rehabilitation program for the Unincorporated Orange County.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Programs 6.
Strategy 2b. Preserve the affordability of federal, state and County-subsidized units threatened with conversion to market rates.	Continue to monitor projects with expiring affordability covenants and take appropriate action to preserve these affordable units whenever possible.	Orange County continues to work toward preserving the affordability of at-risk units on a project-by-project basis. As a policy, the County attempts to negotiate new agreements to extend protections for at-risk units and to preserve their status as affordable when existing agreements near expiration.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6.
	Continue to assist owners or purchasers of existing Mortgage		

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Strategy	Action	Accomplishments	6th Cycle Status
	Revenue Bond (MRB) projects to refund their bonds in exchange for augmented and/or extended affordability controls. Annually contact owners of at-risk units to gauge interest, provide a list of resources available for refund and negotiate terms on a project-by-project basis.		
Strategy 2c. Enhance the quality of existing residential neighborhoods by maintaining public facilities and requiring residents and landlords to maintain their properties in good condition.	Continue the County's code enforcement and graffiti removal programs.	Orange County continues to enforce zoning code and property maintenance requirements throughout the Unincorporated areas, using a complaint-based approach.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6.
	Continue to provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program (CIP).	Orange County continues to provide infrastructure maintenance and improvements in the Unincorporated areas, including upgrades to public infrastructure and public facilities to better meet Americans with Disabilities Act requirements, as well as roadway and flood projects.	
	Continue to participate in the CDBG program.	Orange County continues to participate in the CDBG program, and to facilitate the distribution of CDBG funds in response to applications, using the adopted Consolidated Plan to guide the prioritization of projects that serve affordable housing and special needs populations.	
	Identify existing apartment complexes in need of repair and provide financial assistance or other incentives to encourage the owner to make a substantial investment in rehabilitation and ongoing maintenance and guarantee long-term affordability.	Orange County continues to research various forms of financial assistance for the repair and rehabilitation of existing housing stock. Housing rehabilitation is an activity eligible for funding through the HOME Investment Partnerships Program (HOME), Community Development Block Grant Program (CDBG), and Section 108 Loans. In Fiscal Year 2021-2022, CDBG funds helped 9 housing rehabilitation projects. HOME funds also assisted in funding housing rehabilitation projects during Fiscal Year 2021-2022.	
	Review Unincorporated islands and identify three priority areas with the highest potential for affordable housing development.	The County has identified potential sites for the development of affordable housing projects.	

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Strategy	Action	Accomplishments	6th Cycle Status
Strategy 2d. Ensure that the conversion of rental units or mobile home parks to ownership or other uses occurs in a responsible manner to protect the rights of both owners and tenants.	Continue to enforce the provisions of the County's condominium and mobile home park conversion ordinance (section 7-9-147).	The County continues to enforce the provisions of the County's condominium and mobile home conversion ordinance (section 7-9-39). During the planning period, no issues of conversion of condominiums and mobile home parks from rental units to ownership or other uses has occurred.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6.
3. Equal Housing Opportunity			
Strategy 3a. Continue to support enforcement of fair housing laws and organizations that provide fair housing information and intervention.	Provide financial assistance from CDBG funds or other sources to fair housing organizations.	Orange County continues to provide financial assistance from CDBG funds, or other sources, to fair housing organizations.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 8.
Strategy 3b. Facilitate the education of residents about their fair housing rights and of the process to make appropriate referrals for fair housing complaints.	Provide federal/state/local information regarding discrimination to residents at family briefing sessions, including applicable Fair Housing Information and Discrimination Complaint Forms. Also maintain bilingual staff to assist non-English speaking families and handicap accessible offices.	Orange County continues to provide information regarding housing discrimination to residents both through online publications and information housed on the OCCR website, and through periodic public information sessions regarding fair housing. The Orange County Board of Supervisors approved the County's 2020-2025 Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan (the Consolidated Plan) on June 23, 2020. The Consolidated Plan identifies priorities for the use of the HOME, CDBG, and ESG funds that the County administers, which includes programs to assist in addressing fair housing issues. The County also partners with the Fair Housing Council of Orange County to provide information on fair housing and housing discrimination. OC Housing Authority's offices are handicap accessible, and the County is more broadly engaged in ensuring that County facilities are accessible, and in making accessibility upgrades to public infrastructure. The County's Community Resources offices maintain bilingual staff to assist non-English speaking families. Additionally, the County partners with 2-1-1, a 24/7 telephone resource system that links residents with community health, human services, and support organizations, including fair housing resources.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 8.
	Continue to work with the Orange County Fair Housing Council to provide information and regarding housing discrimination and intervention to resolve complaints.	Orange County continues to work with the Fair Housing Council to provide information to residents and regarding housing discrimination and intervention to resolve complaints. The County hosts fair housing trainings for property managers and owners and posts fair housing information on its website, and the Fair Housing Council of Orange County provides fair housing information both on its website, through workshops and seminars, and in-person at its offices.	

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Strategy	Action	Accomplishments	6th Cycle Status
	Literature is made available at County and FHC offices.		
Strategy 3c. Encourage the removal of architectural barriers in existing residential units, and ensure that new units comply with accessibility standards.	Continue to enforce building code provisions requiring accessible design.	Orange County continues to enforce building code provisions requiring accessible design. A reasonable accommodation ordinance was adopted in 2013. For projects requiring discretionary permits, accessibility requirements included in the Building Code are required to be met before a permit can be closed out.	The County found that this program was insufficiently specific to adequately quantify achievements. A strategy to encourage housing production has been included in Programs 1, 2, 3, 4, 5, and 7.
4. Assistance to Persons in Need			
Strategy 4a. Encourage affordable housing opportunities for households with incomes less than 30% of area median income (AMI)~~,~~	Continue to support the County Housing Authority and its participation in the Section 8 Rental Assistance Program and pursue additional Section 8 rental assistance vouchers when available.	The Orange County Housing Authority (OCHA) continues to participate in the Section 8 Housing Choice Voucher Program. OCHA also administers the Veterans Affairs Supportive Housing Program (VASH), the Non-Elderly Disabled (NED), the Mainstream Program, the Family Unification Program (FUP) and the Shelter Plus Care/Continuum of Care (CoC) Program. More than 12,000 households (over 25,000 people) receive housing assistance each month through OCHA's rental assistance programs.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 2, 3, 4, 5, and 7.
	Continue the goal of producing units affordable at or below 30% AMI in the County's Rental Housing NOFA.	Orange County's NOFA continues to include the goal of producing affordable units to extremely-low-income persons and households.	
	Encourage developers seeking development agreements to include housing units affordable to households with incomes of less than 30% AMI.	The provision of affordable housing will be encouraged in any future negotiated development agreements. No development agreements were negotiated during the planning period.	
Strategy 4b. Provide information and financial assistance to help low- and moderate-income households in obtaining affordable housing.	Continue the Tax -Exempt Single-Family Mortgage Revenue Bond Program for first-time homebuyers.	Orange County continues to provide the Tax-Exempt Single-Family Mortgage Revenue Bond Program for first-time homebuyers.	The County found this program to be successful and has revised this strategy to further encourage housing production through Programs 1, 3, and 5.
	Continue to publish the Affordable Rental Housing List.	Orange County continues to publish the Affordable Rental Housing List to provide information to lower-income renters. The Affordable Rental Housing List is published on the County's website for easy access and is updated regularly. The Affordable Rental	

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Strategy	Action	Accomplishments	6th Cycle Status
		Housing List is published in multiple languages to ensure that all people looking for affordable rental accommodations have access to the same information.	
Strategy 4c. Ensure that all affordable housing assisted with public funds remains affordable for the required time period, and recapture public funds when directly subsidized units are prematurely sold or otherwise withdrawn from the subsidizing program.	Monitor all bond-financed and other subsidized projects annually to verify compliance with affordability covenants.	The County continued to maintain affordability of existing units to the greatest extent possible. Affordable housing projects are monitored on a regular basis to verify continued required affordability.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Program 6. .
Strategy 4d. Continue to support the existing programs that address the needs of those in need of temporary and transitional housing.	Continue to provide assistance as described in the County's Continuum of Care program.	In June 2018, the Board approved the Housing Finance Strategy for the development of 2,700 supportive housing units. The strategy calls for the development of these units over the next seven years using existing County resources, as well as through leveraging a range of other housing development funding sources. The Board also approved the MHSA Permanent Supportive Housing Spending Plan for the use of $70.5 million in MHSA funds in the development of supportive housing for the seriously mentally ill. Since the adoption of the Housing Funding Strategy in 2018, to date, in the county there are a total of 680 supportive and affordable housing units completed or built, 816 units under construction or closing their construction loan, and 772 units in progress of funding which contributes to the overall accomplishment of supporting and tracking the development of over 2,700 supportive and affordable housing units throughout the county by 2025. To date, approximately 84% of the total unit goal has been met by the units which are completed, in construction, or in the process of funding.	The County found that this program was insufficiently specific to adequately quantify achievements, so this program has been replaced with Programs 2 and 4.
	Identify additional sites that are now available or easily made available for transitional shelters for homeless persons and families.	Orange County will continue to provide information regarding the location of sites eligible under its Housing Opportunities Overlay Zone – primarily through information available on the County's website.	
5. Energy Conservation			
Strategy 5a. Encourage the use of energy conservation features	Continue to require new construction and remodeling	Orange County continues to require new construction and remodeling projects to meet energy conservation requirements as a part of permitting and entitlement review.	The County found this program to be successful and has revised this strategy to

Table A-1
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Strategy	Action	Accomplishments	6th Cycle Status
in residential construction, remodeling, and existing homes.	projects to meet energy conservation requirements.		further encourage housing production through Programs 1, 2, 3, 4, 5, 7, and 9.
	Provide information regarding energy efficiency measures in the Orange County Housing Opportunities Manual.	The County continues to publicize available assistance programs through the County website and flyers. Information regarding energy efficiency measures continues to be included in the Housing Opportunities Overlay Manual. Sustainable best practices are incorporated in the Comprehensive Update to the Zoning Code, and include various measures, such as the option to use pervious materials in driveways and allowing carport roof solar panels with no additional permit requirements. Additional language is proposed relating to electric vehicle charging stations, "hedges" are added as a type of wall or fence, alternative parking calculations are permitted along with new parking lot landscaping requirements.	
	Provide clients with information regarding "CalGreen" – California's Green Building Code.	Clients receive information regarding CalGreen (green building code) and energy conservation at County of Orange offices and on its websites. The County provides information through the County website and flyers.	
6. Child Care Facilities			
Strategy 6. Amend existing regulations to remove regulatory obstacles for new child care facilities within affordable housing developments	Both the Zoning Code and Housing Opportunities Manual will be amended to allow the provision of child care in affordable housing developments utilizing the Housing Opportunities Overlay Zone program. The County's Child Care Coordinator will be invited to assist in the development of the criteria and requirements for child care facilities and family day care homes. All conditions and requirements applied to this use will be delineated in the Affordable Housing Agreement entered into between the County and developer for each affordable housing development.	Orange County amended its Housing Opportunities Overlay Zone regulations in 2009 to provide incentives (I.e., a density bonus) for the inclusion of child care facilities within affordable housing developments.	The County found that this program was insufficiently specific to adequately quantify achievements. Objectives to encourage housing production have been included in Programs 1, 2, 3, 4, 5, 7, and 9.

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Multifamily							
Anaheim	Cerritos	R1				60	60
Midway City	Potter's Lane 15352 Jackson	R1				16 37	16 37
Midway City		R3(1950)/35				17	17
Midway City		R3(1950)/35(H)				4	4
Stanton	Stonegate I Stonegate II	C1(H)				38 26	38 26
Rancho Mission Viejo		PC				637	637
Silverado-Modjeska		A1(SR)				2	2
						Total Multifamily	837
Accessory Dwelling Units							
Anaheim		R1				6	6
Anaheim		R2D				1	1
Costa Mesa		R1				1	1
Coto de Caza		S				1	1
Foothill Trabuco		S				1	1
Los Alamitos (Rossmoor)		R1/28 (C3849)				1	1
Midway City		R1				37	37
Midway City		R3(1950)/35 (H)				3	3

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Santa Ana (North Tustin)		100-E4				3	3
Santa Ana (North Tustin)		125-E4-20000				1	1
Santa Ana (North Tustin)		E4				1	1
Santa Ana (North Tustin)		E4-20000				1	1
Santa Ana (North Tustin)		NTSP				3	3
Santa Ana (North Tustin)		R1				4	4
Orange		70-R1				2	2
Orange		E4-1(E)				1	1
Orange		E4-1(SR)(E				1	1
Orange		R4				1	1
Rancho Mission Viejo		PC				2	2
Santa Ana (North Tustin)		100 - E4				2	2
						Total Accessory Dwelling Units	73
Modular Units							
Orange		R4				1	1
						Total Modular	1
Single Family Units							
Anaheim		R1				28	28
Anaheim		R2D				1	1
Costa Mesa		R1				4	4

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Costa Mesa		R4				5	5
Coto De Caza		S				14	14
Foothill-Trabuco		FTSP				7	7
Ladera Ranch		PC				477	477
Laguna Beach (Emerald Bay)		R1(CD)(SR)				28	28
Los Alamitos (Rossmoor)		R1/28 (C3849)				38	38
Midway City		R1				35	35
Midway City		R3(1950)/35 (H)				8	8
Santa Ana (North Tustin)		100-E4				8	8
Santa Ana (North Tustin)		125-E4-20000				8	8
Santa Ana (North Tustin)		E4				8	8
Santa Ana (North Tustin)		E4-20000				3	3
Santa Ana (North Tustin)		NTSP				5	5
Santa Ana (North Tustin)		R1				1	1
Santa Ana (North Tustin)		R1-18000				1	1
Orange		E4-1				2	2
Orange		E4-1(E)				3	3
Orange		E4-1(SR)(E)				2	2
Orange		R1				1	1
Orange		R1(SR)				4	4

Table A-2
Residential Development Summary
Unincorporated Areas 2013-2021

Location	Affordable Housing Project*	Zoning	Income Level*				Total Project Units
			VL*	Low*	Mod	Above Mod	
Orange		R1-10000(SR)				1	1
Orange		R4				1	1
Rancho Mission Viejo		PC				2684	2684
Santa Ana (North Tustin)		100 - E4				3	3
Santa Ana (North Tustin)		E4-20000				1	1
Santa Ana (North Tustin)		R1-10000(SR				1	1
Silverado-Modjeska		A1				7	7
						Total Single Family	**3389**

**Lower-income apartments and accessory dwelling units are based on prevailing market rents*
Source: OC Development Services, 2021
Note: Descriptions of zoning districts can be found in Table 3-3

Table A-3
Affordable Housing Projects Completed 2013-2021
Unincorporated Orange County

Project	Status	Location	Zoning	Parcel Size (ac)	Density (du/ac)	Income Level				Total Units
						VL (EL*)	Low	Mod	Above Mod	
Sendero Bluffs	Completed and occupied	Rancho Mission Viejo	PC	2.78	38.4	32	74	0	1**	107
Esencia Norte	Completed and occupied	Rancho Mission Viejo	PC	4.0	28	34	77	0	1**	112
Potter's Lane	Completed and occupied	Midway City	C2	0.41	39	15	0	0	1**	16
TOTALS (deed-restricted affordable units only)						**81**	**151**	**0**	**3**	**235**
					Avg. Density of All Projects	**35.1**				
					Avg. Density of Projects in Housing Opportunities Overlay Zone	**39**				

** Extremely low-income (30% AMI)*
*** Manager's unit (not deed-restricted)*
Source: OC Development Services, 2021
Note: Descriptions of zoning districts can be found in Table 3-2

Table A-3 illustrates the affordable housing projects completed during this reporting period (2013-2021):

- **Esencia Norte** is located at the east side of Esencia Drive between Cow Camp Road and Andaza Street in the Unincorporated community of Ranch Mission Viejo, includes a new construction development of 111 units serving large families with rents affordable to households earning 50-60% of area median income (AMI).
- **Sendero Bluffs** is located at northeast corner of Ortega Highway and Gateway Place in Rancho Mission Viejo, includes a new construction development of 106 units of housing serving seniors with rents affordable to households earning 50-60% of area median income (AMI).
- **Potter's Lane** is a 16-unit affordable housing apartment community per Housing Opportunities Overlay Zone Regulations. The project is two stories, with 15 studio units (480 sq. ft.), and one Manager's Unit (480 sq. ft.). The Project is 100% affordable to low- and very low-income households. Based upon its affordability, the project was eligible for a 35% density bonus and three incentives.

Table A-4
Progress Towards Meeting New Housing Need
Unincorporated Orange County 2013-2021

	Very Low*	Low*	Moderate*	Above Moderate	Total
Total RHNA 2013-2021	0	879	979	2,174	5,272
Quantified Objective	1,240	879	979	2,174	5,272
Total Units Built 2013-2021	81	151	180	4,429	4,841

Table A-5
Preservation and Assistance
Performance Evaluation vs. Quantified Objectives 2013 – 2021

Program	Extremely Low-Income	Very Low-Income	Low-Income	Moderate Income	Above Moderate-Income	TOTAL
Continuum of Care (CoC) (previously referred to as Shelter Plus Care)	444	54	19	83	–	600
% Breakdown	74%	9%	3%	14%	–	100%
Actual	408	50	17	76	–	
% Breakdown	74%	9%	3%	14%	–	100%
Housing Choice Voucher (HCV) (previously referred to as Section 8 Rental Assistance)	5,396	1,466	433	3,810	–	11,105
% Breakdown	49%	13%	4%	34%	–	100%
Actual	4,808	1,314	386	3,386	–	9,894
% Breakdown	49%	13%	4%	34%	–	100%

Source: OC Community Resources / Occupancy data on the actual point in time income levels of active CoC and HCV Program participants is derived from the Income Characteristics Report prepared via Housing Pro on June 2021.
(-) is used to denote that we do not have quantified objectives for Above Moderate housing.

Rehabilitation - Performance Evaluation vs. Quantified Objectives 2013 – 2021

The County's rehabilitation program was inactive from 2013-2022. OC Community Resources is continuing to work towards the development of a new single-family rehabilitation program for Unincorporated Orange County scheduled to begin in 2022.

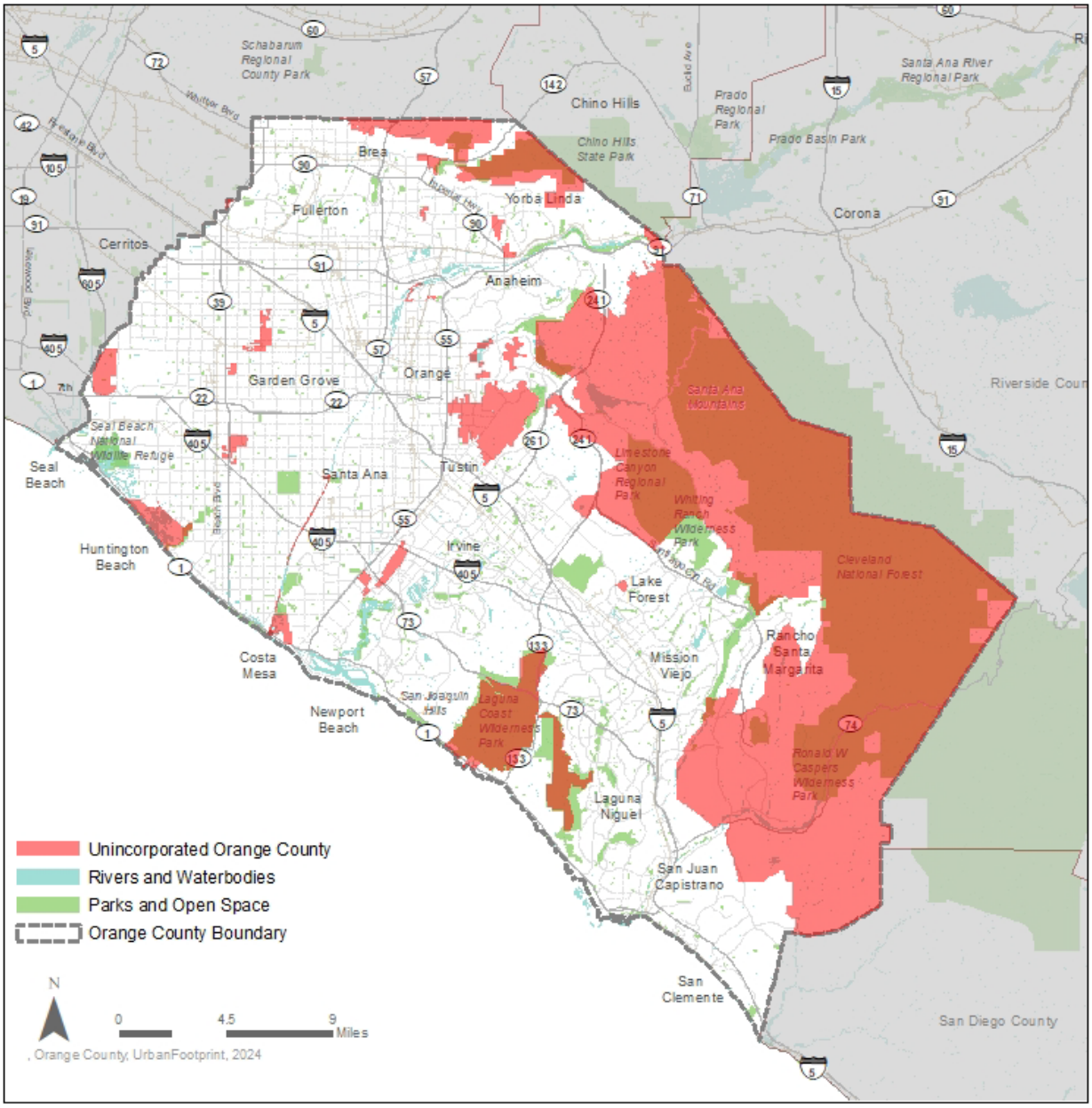
APPENDIX B: LAND INVENTORY

State law requires that jurisdictions include a statement of their goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing. (Gov. Code, Section 65583, subd. (b).) The Housing Element is required to include an inventory of suitable sites for housing development compared to the jurisdiction's assigned share of the region's housing need. Part of this analysis involves identifying adequate sites to accommodate a jurisdiction's share of regional housing needs for all income groups. Adequate sites are those with appropriate zoning designations and development regulations needed to facilitate and encourage the development of a variety of housing for all income levels. The land and program resources available for the development of housing in Unincorporated Orange County are addressed here.

The Unincorporated County

While there are 34 cities in Orange County, this housing element focuses on the Unincorporated area - territory that is not located within a city. Due to the geographic distribution of Unincorporated land, the Housing Element (along with the rest of the General Plan) must address a diverse geographic and socioeconomic area, from small Unincorporated islands surrounded by cities to large, planned communities. Most of the Unincorporated County land area is in the southern portion of the County. In the central and northern parts of the County, there are many small, Unincorporated "islands" of property (see **Figure B-1**). Since 1993, the incorporation of three new cities (Laguna Woods, Rancho Santa Margarita, and Aliso Viejo) together with the annexation of Unincorporated territory to existing cities during this period, have reduced the Unincorporated County area in size by over 40 percent, from approximately 414 square miles to 321 square miles. Also, most of the Unincorporated County areas in the southern part of the County are preserved as open space/agriculture due to the mountainous geography. This leaves limited areas for residential development in areas that are fully or almost fully built out.

Figure B-1
Unincorporated Orange County



The assumptions and methodology for the residential land inventory are provided in this appendix. The sites identified within the Housing Element represent the County of Orange's ability to plan for housing at the designated income levels within the 6th Cycle planning period (2021-2029).

Table B-1 shows the County's 2021-2029 RHNA need by income category as well as a summary of the sites identified to meet that need. The analysis within this appendix shows that the County of Orange has the capacity to meet their 2021-2029 RHNA allocation through a variety of methods, including:

- Identification of development capacity on sites which either currently permit development of residential uses at or above 30 dwelling units per acre.
- Identification of County owned properties suitable for the development of housing.
- Future development of accessory dwelling units (ADUs).

Zoning and Affordable Housing in Orange County

Demand for housing in Orange County, and all Southern California in general, has significantly increased over the past decade due to slow housing production. The County has worked to encourage housing development but is constrained, as are other urbanized jurisdictions, by lack of undeveloped (vacant) land, high land prices, open space deficits, and productive industrial uses that create land use conflicts if too close to residential neighborhoods. All the while, the cost of developing subsidized affordable housing has increased while public funding has decreased. Knowing that the housing needs of County residents and their families have reached a critical pitch, the County has embarked on many programmatic actions to expand the opportunities for new residential development.

The County has established a Housing Opportunities Overlay or "HOO" zoning overlay district that provides for the development of 100% affordable rental housing by-right (without a use permit) within commercial and/or industrial districts, and on building sites zoned for higher density residential uses, and for the establishment of emergency shelters, multi-service centers and low-barrier navigation centers. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning. The County also offers alternative (reduced) parking requirements for residential development within the Housing Opportunities Overlay Zone.

In 2022, the Board of Supervisors adopted a Zoning Code amendment to increase the base density in the Housing Opportunities Overlay Zone from 43.5 to 70 units per acre, excluding any applicable density bonus units and geographically expanded the Housing Opportunities Overlay (HOO). Developers are also able to achieve even higher densities through the State's density bonus provisions. Since the adoption of the Housing Opportunities Overlay Zone, nine projects (within the Housing Opportunities Overlay Zone) with a total of 371 affordable units have been approved, which demonstrates the effectiveness of the regulations in facilitating the production of housing for lower-income families. More than half of those units have been developed in the last ten years. The average density of these projects has been over 40 units per acre. This is significant as the maximum base HOO density at the time of project approval was either 25 units per acre (2006-2020) or 43.5 units per care (2020-2022). Compared to the base density allowed in the HOO at project approval, most projects resulted in densities of over 100%. Overall, the average density for all HOO projects was 134% of maximum allowed density. With a base density increase to 70 units per acre, the potential for new housing development in the HOO is

significant. The HOO projects developed or under development since 2007 is presented in **Table B-14.**

To further encourage development of higher density housing, in 2024, the minimum density for most multi-family zoned areas was increased to 30 units per acre and properties zoned for Local Business (C1), General Business (C2), Commercial Community (CC), Commercial Highway (CH), Commercial Neighborhood (CN), or Residential Profession (RP), were rezoned to the Mixed-Use (MX) zoning designation. The Mixed-Use designation allows stand-alone residential development at a minimum of 30 units per acre density and requires the inclusion of at least 50% residential development for mixed-use projects. Stand-alone non-residential development is not allowed which means that within the mixed-use zone with an HOO overlay, higher density, affordable, stand-alone housing is most likely to develop.

Accommodating the 6th Cycle RHNA in built-out communities like those in the Unincorporated County represents a formidable challenge. Nonetheless, the County has paired this housing resources section with an aggressive set of policies and programs that will work to address the challenge.

Regional Housing Needs Assessment (RHNA) for 2021-2029

The Regional Housing Needs Assessment (RHNA) is a key part of State housing element law (Government Code Section 65580) and is a central factor in satisfying periodic required updates of the housing element. Every city and county in the State of California has a legal obligation to respond to its fair share of the existing and projected future housing needs in the region in which it is located. Housing element law requires local governments to update land use plans, policies, and zoning to accommodate projected housing growth. The RHNA figure is not a projection of residential building permit activities, but of housing need based on regional growth projections and regional policies for accommodating that growth. Although the Housing Element covers the eight-year planning period from October 15, 2021, through October 15, 2029, the 6th projection period spans June 30, 2021, through October 15, 2029.

For the 2021-2029 planning period, the Unincorporated County's RHNA allocation is 10,406 housing units. The 10,406 housing units allocated to the unincorporate area for the 6th RHNA planning cycle is divided as follows: 3,139 housing units for extremely low and very low-income households, 1,866 housing units for low-income households, 2,040 housing units for moderate-income households, and 3,361 housing units for above-moderate-income households.

Every housing element must demonstrate that the local jurisdiction has made adequate provisions to support the development of housing at various income levels (extremely low, very low, low, moderate, and above moderate) to meet its 'fair share' of the existing and projected regional housing need. However, because local jurisdictions rarely, if ever, develop and construct housing units, the RHNA numbers establish goals that are used to guide planning, zoning, and

development decision- making. Specifically, the numbers establish a gauge for determining whether the County is allocating adequate sites at a range of densities to accommodate the development of housing– meeting the County's RHNA. In particular, the County must identify adequate sites for lower-income households that will allow residential uses at a density of at least 30 units per acre.

Local Issues and Trends

The following is a summary of local housing trends, which correlate with the RHNA allocated to the Unincorporated County areas, and illustrate the changing housing needs within the Unincorporated County areas:

- As shown in **Table B-1**, the County has identified 1,707 housing units that have been completed to contribute to the County's efforts to meet its 2021-2029 RHNA.
- Over the last eight years, over 3,779 housing units have been constructed in the Unincorporated County areas, 81 of which serve very low-income households, and 151 of which serve low-income households.
- The County satisfied 91.9% of its quantified objectives for providing Continuum of Care (551 Continuum of Care participants out of the 600-participant objective) between 2013 and 2021.
- The County satisfied 89% of its quantified objective for Housing Choice Voucher participants (9,894 participants out of the 11,105-participant objective) between 2013 and 2021.
- Since 2010, the County's population has become increasingly diverse leading to more diverse housing needs, including creased demand for very low-, low-income, and rental housing options.
- Currently, an estimated 128,421 persons reside in the Unincorporated County areas (DOF 2020), comprising over 42,000 households (estimated based on the American Community Survey 2020, 5-year estimates).
- Housing prices and median gross rent both in the Unincorporated County areas and Orange County as a whole have increased in the time since 2013, indicating a tight housing and rental market in the face of increased demand.
- Despite the Unincorporated County areas' loss of households and population to incorporations and annexations, SCAG forecasts that the Unincorporated County areas will grow by 49.2% over the next ten-year planning period.
- More than 50% of renters in Unincorporated County areas are in overpayment situations, with a smaller percentage of homeowners in Unincorporated County areas being in overpayment situation the Unincorporated County areas is $90,234.

- While most of the housing stock in the Unincorporated County areas is more than 20 years old, only approximately 1% of the housing stock in the Unincorporated County areas is in need of repair or rehabilitation.

Strategies for Meeting the RHNA

Orange County's housing needs will be met through the implementation of a variety of strategies (**Table B-1**). California law requires communities to facilitate the development of housing through land use planning and zoning regulations. State housing element law allows local governments to obtain credits toward meeting its RHNA goal in different ways:

- Units approved, entitled, or constructed that would be available during the RHNA projection period of June 30, 2021, through October 15, 2029
- Accessory Dwelling Units (ADUs) that may be constructed based on a projected trend
- Vacant and nonvacant sites available for residential and mixed-use development during the Housing Element planning period (October 15, 2021, through October 15, 2029)

The primary method for addressing the adequate sites requirement is the identification of available vacant and underutilized sites that are appropriately zoned and likely to develop within this planning period. Following available site identification, sites that would be available for housing once rezoning actions were completed were identified. The following describes the County's approach to addressing its 2021-2029 RHNA as determined by the Southern California Association of Governments (SCAG).

Table B-1
RHNA Strategy Summary

	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
RHNA (2021-2029)	*1,570*	*1,569*	*1,866*	*2,040*	*3,361*	*10,406*
Units approved, entitled, or constructed (Begins June 30, 2021- December 31, 2023)		111	21	10	1,565	1,707
6TH Cycle RHNA Transfers		32	-	34	-	66
Constructed/Projected ADU Development		128	221	154	10	513
Sites Not Requiring Rezoning		587	-	1,124	3,433	5,144
RHNA Shortfall		**(2,281)**	**(1,624)**	**(718)**	**+1,647**	**(2,976)**
Sites Requiring Rezoning		4,266	-	871	-	5,137
RHNA Status: +Surplus/(Shortfall)		***+1,985***	***(1,624)***	***+153***	***+1,647***	

Approved, Entitled, or Constructed Projects

Approved and proposed residential development projects can be credited toward the 2021-2029 RHNA. In Unincorporated Orange County, projects credited towards the RHNA are shown in **Table B-2**. Two projects are affordable:

- Casa Paloma is a fully affordable housing project developed in the Housing Opportunities Overlay Zone and on the site of a previous pottery manufacturing facility. The four-story apartment building consists of 71 units (69 rental units and two managers' units), of which 48 units serve formerly homeless households. The Development consists of 59 one-bedroom units, 10 two-bedroom rental units and two two-bedroom managers' units. Rents for 48 of the units are set at 30 percent of Area Median Income (AMI) and the remaining rental units will be set at 50 percent AMI or below. The project was developed by American Family Housing, a nonprofit affordable housing developer, and financing included a County permanent loan, HCD Housing for a Healthy California funds, and commitment of 48 Housing Choice and/or Mainstream Project Based Vouchers.
- American Family Housing is developing a 65-unit affordable development in the Housing Opportunities Overlay Zone in Midway City. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project qualifies for the unlimited density bonus provision. The project's proximity to a major transit stop also permits use of modified parking standards. The planning application for Jackson Street was approved in 2024.

Table B-2
Approved or Entitled Projects (since June 30, 2021)

Project	Extremely-/ Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
Ranch Hills Estate (SF-Attached project)	-	-	-	37	37
Legacy at Coto (MF project)	-	-	-	100	100
Fairlynn Townhomes (SF- A project)	-	-	-	44	44
Oak Grove (SF project)	-	-	-	13	13
Saddlecrest (SF project)	-	-	-	65	65
Cielo Vista (SF project)	-	-	-	80	80
Esperanza Hills SP (SF project)	-	-	-	340	340
Wass Condo (SF- A project)	-	-	-	10	10

Table B-2
Approved or Entitled Projects (since June 30, 2021)

Project	Extremely-/ Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
Cowan Heights Estate (SF project)	-	-	-	16	16
Casa Paloma (Affordable MF project)	48	21	-	2	71
American Family Housing (Affordable MF project)	63	-	-	2	65
Single units approved, entitled, or constructed (June 30, 2021- December 31, 2023)	-	-	10	856	866
Total	***111***	***21***	***10***	***1,565***	***1,707***

Source: County of Orange, 2024
SF: Single Family; SF-A: Single Family Attached; MF: Multifamily

6th Cycle RHNA Transfers

The County has been successful in utilizing County-owned properties for affordable housing developments located in other jurisdictions, as exemplified by the Crossroads at Washington project in the City of Santa Ana, and the Placentia Veteran's Village project in the City of Placentia. Using SCAG-approved RHNA transfers, the County received a RHNA credit of 42 units (20 very low-income and 22 moderate) out of a total of 86 units for the Crossroads at Washington project and 24 units (12 very low-income and 12 moderate) out of a total of 50 units for the Placentia Veteran's Village project. This represents approximately 49% of the total units for these two projects. The County of Orange, through OC Community Resources, as a regional facilitator of development of permanent supportive housing throughout Orange County will continue to collaborate with CEO Real Estate to identify County-owned real property that may provide future affordable housing opportunities. In OC Community Resources' 2023 Supportive Housing Notice of Funding Availability (NOFA), RHNA transfer credit policies are included to inform applicants applying for County capital funding and/or Housing Choice Project Based Vouchers that the County will seek RHNA credit transfers. For housing developments located in cities which are funded with County revenue (such as General Funds, Housing Successor Agency funds, or APRA-SLFRF funds), the County will require the transfer of a RHNA allocation from the City to the County on a pro-rata basis of funds to total development costs. The County may also optionally utilize RHNA credit transfer for developments with Federal or regional revenue resources. The County will continue seeking such RHNA credit transfers where appropriate to ensure that housing needs within the Unincorporated County areas are addressed along with the housing needs for incorporated jurisdictions on housing developments for which the County facilitates funding.

Constructed/Projected Accessory Dwelling Units (ADUs)

In accordance with State law, the County may credit potential ADUs to the RHNA requirements by using the trends in ADU construction to estimate new production. Between 2018 and 2023, the County has seen steadily increasing ADU activity, with a total construction of 285 units over 6 years:

- 2018 – 23 ADU permits
- 2019 – 21 ADU permits
- 2020 – 50 ADU permits
- 2021 – 57 ADU permits
- 2022 – 60 ADU permits
- 2023 – 73 ADU permits

Looking back at ADU trends for the Unincorporated County, starting in 2018, the County issued 23 ADU permits, followed by 21 permits in 2019, 50 permits in 2020, 57 permits in 2021, 60 permits in 2022, and 73 permits in 2023. From June 2021 through the end of 2023, there were about 162 ADU permits issued. In summary, since 2018 the County has seen a 217% increase in the number of ADU permits issued. The County continues to see year over year growth in ADU applications and ADU permits issued which is a strong indicator that future ADU permits issued will exceed the past rate of production and continue the upward trend. The County is facilitating ADU production through a variety of proactive efforts. For the remaining 5.83 years left in the planning period, an annual estimate of 60 units based on the average permits issued from 2020-2023 (4 years) is used. Given that 73 permits were issued in 2023, this estimate is reasonable and achievable.

SCAG conducted an income/affordability survey of ADUs in the region. Orange County is located within the Orange County study area for the SCAG income/affordability ADU survey. The analysis resulted in affordability assumptions for jurisdictions in Orange County as follows: 15% can be assigned to the extremely-low-income category, 10% to very low-income, 43% to low-income, 30% to moderate-income, and 2% to above-moderate-income. Therefore, based on the ADU rent survey conducted by SCAG, of the 513 ADUs that can be credited toward the RHNA, the income distribution can be estimated at 128 extremely-/very low-income, 221 low-income, 154 moderate-income, and 10 above-moderate-income units.

The County has updated the Zoning Code to comply with State law regarding accessory dwelling units, or ADUs. ADUs are housing units which may be developed in addition to an existing single- or multifamily residential use. These housing units can be free-standing or attached to a primary structure and are intended to provide additional housing on an existing residential lot. Often ADUs provide housing for family members or are rented to members of the community.

OC Development Services is currently preparing pre-approved ADU plans to streamline and facilitate a more streamlined ADU permitting process (see Housing Action Plan, Program 7),

which is anticipated to contribute to continued increase in ADUs applied for, permitted, and constructed within Unincorporated Orange County. Along with preparing pre-approved ADU plans, in March 2023, the Orange County Housing Finance Trust (OCHFT) was awarded a $4 million grant from CalOptima Health for the purpose of creating and operating an ADU Loan program. The program is designed to provide low-cost loans to homeowners, enabling them to construct new ADUs on their primary residences with a goal of expanding access to income opportunities for homeowners while also providing much needed affordable rental units exclusively for very low-income tenants, including and prioritizing Section 8 voucher holders. Both programs-approved ADU plans and the ADU loan program are anticipated to bolster ADU production throughout the County and encourage the development of additional affordable units.

OC Development Services will continue to track ADU development by affordability level and report on Annual General Plan Progress Report (APR). Through the County's permitting system, the County currently tracks ADU applications and permits daily. The County reports this progress regularly through a variety of required reporting. Since 2010, the County reports the total number of issued housing units, which include the specific number of ADU/JADUs, to the US Census Bureau monthly. Secondly, the total number of completed residential housing units, including the total number of ADUs/JADUs completed, are reported in a mid-year and annual report through the Housing Unit Inventory System to the Center for Demographic Research (CDR) since 2015. Finally, since 2011, the County reports ADU progress in the APR and Housing Element Implementation Report, and the Department of Finance Housing Unit Survey.

The County has also included an action under Program 6 in the Housing Action Plan to continue current tracking and reporting of ADU permit activity and should changes need to be made due to a gap in the number of ADUs projected and the number permitted, the County will make changes proportional to the gap identified within 6 months of the annual review. This may include, but is not limited to, rezoning or community outreach.

Summary of Progress Toward RHNA

After accounting for projects developed or under development, RHNA transfers, and projected ADU development, the remaining RHNA allocated to the County for this 6th Cycle is 8,120 units. The County must identify available vacant and non-vacant sites that can accommodate at least 8,120 units (by income level). HCD also recommends that jurisdictions identify residential capacity within their boundaries that is above and beyond the required housing numbers identified in lower-income categories, to help offset sites that may (or may not) be developed during the planning period. The County must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029. To accomplish this, the Sites Inventory was developed and is described in further detail in the following section.

Table B-3
Remaining RHNA Need After Credits and ADU Units

	Extremely/ Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
Units approved, entitled, or constructed (Begins June 30, 2021- December 31, 2023)	111	21	10	1,565	1,707
6TH Cycle RHNA Transfers	32	-	34	-	66
Constructed/Projected ADU Development	128	221	154	10	513
Total	***271***	***242***	***198***	***1,575***	***2,286***
RHNA (2021-2029)	*3,139*	*1,866*	*2,040*	*3,361*	*10,406*
RHNA Status: +Surplus/(Shortfall)	***(2,868)***	***(1,624)***	***(1,842)***	***(1,786)***	***(8,120)***

Availability of Sites for Housing Production

This section contains an analysis of existing and available land with the potential for housing development in the 2021-2029 planning period compared to the Unincorporated County's remaining housing need.

Sites Not Requiring Rezoning

The inventory of sites that have appropriate zoning in place include one master planned community, one County-owned property, and religious institutions sites (outside of the Housing Opportunity Overlay) that could accommodate residential development. The sites have the appropriate land use and zoning designations in place and did not require any rezoning actions. A summary of currently available sites is presented in **Table B-4**, and a detailed listing consistent with state law is included in **Table B-8**.

Additional land resources are available for future residential development on underutilized sites that required zoning amendments; those sites will be discussed later in this section as sites that required rezoning actions to become adequate sites.

Table B-4
Summary of Sites Not Requiring Rezoning

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
Rancho Mission Viejo	165	1,000	3,001	4,166
Coyote Canyon	62	124	432	618
Non-HOO Religious Institution Sites	360	-	-	360
Total	***587***	***1,124***	***3,433***	***5,144***
Remaining RHNA (after Credits/ADUs)	*4,492*	*1,842*	*1,786*	*8,120*

Table B-4
Summary of Sites Not Requiring Rezoning

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
RHNA Shortfall Status: +Surplus/(Shortfall)	***(3,905)***	***(718)***	**-**	***(4,623)***

Rancho Mission Viejo

During the past 50 years most development in Unincorporated Orange County has occurred in major landholdings under the planned community concept. Most of these areas were incorporated into new cities between 1988 and 2001, including Mission Viejo (1988), Dana Point (1989), Laguna Niguel (1989), Lake Forest (1991), Laguna Hills (1991), Laguna Woods (1999), Rancho Santa Margarita (2000), and Aliso Viejo (2001). Most of these areas were originally approved as planned communities in Unincorporated Orange County.

Only one planned community in the Unincorporated County areas, Rancho Mission Viejo – has a significant amount of land remaining to be developed during this Housing Element timeframe. Located in southeastern portion of the County east of Rancho Santa Margarita, Mission Viejo and San Juan Capistrano, Rancho Mission Viejo was approved in 2004 with a maximum of 14,000 residential units. It is expected to be the final large landholding that will be developed in Unincorporated Orange County since all other significant undeveloped parcels are located within cities, regional parks, or the Cleveland National Forest. Plans for Rancho Mission Viejo Planning Area 3 are expected to be submitted for approval and are anticipated to accommodate approximately 4,166 units within the 2021-2029 6th Cycle Housing Element Period.

When developing the 2021-2029 RHNA Allocation Plan, SCAG utilized Orange County Projections (OCP) 2018 which each local jurisdiction, including the County, participated in its development and provided population, employment, and housing growth data for the current planning period. The forecast data submitted by the County included information provided by Rancho Mission Viejo. Rancho Mission Viejo forecasted that they would construct 4,166 dwelling units by the end of the 2021-2019 Housing Element planning period. These dwelling units were included in the County's forecast of new construction and are reflected in OCP 2018, the dataset used by SCAG to determine the County's RHNA allocation. Full buildout of the 14,000 units in the Rancho Mission Viejo planned community is expected in approximately 20-35 years. Only the 4,166 units included in the SCAG OCP are included in this site inventory.

In November 2004 the Board of Supervisors adopted a General Plan Amendment, Development Agreement, Rancho Mission Viejo Planned Community Program with associated Statistical Table and Planned Community Development Map, and a Zoning Ordinance with associated Statistical Summary and Zoning Map for Rancho Mission Viejo. This action approved entitlements for the project and established Planned Community zoning on the property allowing

the developer to move ahead with the construction of dwelling units, commercial, recreational, and other non-residential uses. Since 2004, Rancho Mission Viejo has been working with the County to prepare detailed development and infrastructure plans.

The majority of the residential development in Unincorporated Orange County that has occurred over the past 50 years has been in large-scale master planned communities. Unlike traditional zoning, Planned Community (PC) zoning provides certainty in the development process while allowing the property owner to maintain some degree of flexibility in the specific location of development. This type of zoning is more appropriate than traditional zoning because of the magnitude of the projects under a single ownership. Many planned communities in Orange County have encompassed thousands of acres developed over a period of several years. The County has a strong track record of negotiating the inclusion of affordable housing and completing these housing projects on large parcels or sites such as in the planned communities of Mission Viejo, Aliso Viejo, and Rancho Santa Margarita (20,618 total acreage), which later incorporated as cities, and Foothill Ranch, Talega, and Tonner Hills (5,230 total acreage), which were later annexed into the cities of Lake Forest, San Clemente, and Brea respectively Planned Community zoning is more desirable than conventional zoning for large projects because it allows comprehensive, long-range planning for infrastructure while also providing the development certainty needed for property owners to obtain the financing needed to pay for development and public improvements. It also eliminates the need for frequent zone changes that would be necessary under conventional zoning to make adjustments due to market conditions or other circumstances. Instead of a zone change that would require public hearings at the Planning Commission and Board of Supervisors, adjustments to unit counts and locations are typically processed either ministerially by staff, or with only Planning Commission approval. This flexibility simplifies the development review process and reduces total development cost.

Affordability

As part of the General Plan amendment, Planned Community (zone change) and development agreement for Rancho Mission Viejo, the property owner is required to comply with the Affordable Housing Implementation Agreement (AHIA), as amended (2016), which includes the Private Sector Alternative discussed under Strategies and Action section which dedicated an aggregate of 60 gross acres of land to the County for affordable housing development. Per the Development Agreement, and subsequent Affordable Housing Implementation Agreement (AHIA), 165 very low- and low-income units will be produced in Planning Area 3.

A portion of housing proposed in Planning Area 3 will be multifamily housing. Site inventory estimates for Rancho Mission Viejo include 1,000 units affordable to moderate-income households based on expected development of these multifamily units. According to data provided by the developers, 28% of units (or 1,985 units) in Planning Area 3 will be multifamily. While the Plan estimates close to 2,000 multifamily units, only half (1,000) units are allocated to

meet the moderate-income RHNA. The Rancho Mission Viejo Planning Area 3 site is shown on **Figure B-14**.

While these units can be credited toward the lower-income RHNA, consistent with state law, they are instead credited, conservatively, to the moderate-income category. Since the grand opening of Planning Area 1 in 2013, Rancho Mission Viejo and neighborhood builders have completed and sold/rented 1,247 housing units in Planning Area 1, of which 286 are deed-restricted senior housing (Age Qualified) units. In addition, 107 senior affordable apartments have been leased. Based on recent examples of developed multifamily projects in Rancho Mission Viejo, below, it is estimated that half of the units will be in development near or meet the default density of 30 du/ac.

- 1301 Lasso Way (2023): 12-unit multifamily building with a density of 30 du/ac.
- 38 Pasarela Drive (2020): 24-unit multifamily building with a density of 42 du/ac.
- Sendero Bluff Apartments, 30472 Gateway Place (2016): 107-unit multifamily building with a density of 39 du/ac.
- Esencia Norte Apartments 86 Esencia Drive (2016): 112-unit affordable, multifamily building with a density of 28 du/ac.
- Esencia Sur Apartments 92 Esencia Drive (2016): 150-unit multifamily building with a density of 27 du/ac.

The development timetable for Rancho Mission Viejo will be determined by the property owner based on financial and market conditions. Although the most recent recession significantly affected the development schedule, the developer retains the entitlements and zoning necessary to move forward in a much-improved housing market. The County is committed to the following specific actions to facilitate its development.

- The County has designated the Manager, Land Development as the primary point of contact for the developer to expedite applications and resolve issues that may arise.
- The Director, OC Community Resources/Housing is the primary designated contact for facilitating development of the sites to be dedicated for affordable housing.
- Affordable housing projects shall be approved administratively.
- The County will report annually to State HCD and the Board of Supervisors regarding progress toward the development of Rancho Mission Viejo and its affordable housing sites through a required Annual Monitoring Report.

Coyote Canyon

Coyote Canyon is a 375-acre former landfill property that is owned by the County of Orange. The site is located at 20661 Newport Coast Drive, between Bonita Canyon and San Joaquin Hills

Roads, in the City of Newport Beach and within the County of Orange Sphere of Influence. A portion of the property (203 acres) is not subject to restrictions put in place regarding the former landfill use. This is the only portion of the property identified within the County's Housing Element Land Inventory. The full capacity of this site is included in the City of Newport Beach's 6th Cycle Housing Element. However, the County owns the land and has ultimate permitting authority for the site. In other words, if the site is to be redeveloped, including for residential purposes, it will be the County that authorizes such redevelopment. The site is not subject to regulation by the City of Newport Beach General Plan or zoning ordinance. There is no specific land use assigned to the property in the County's General Plan and zoning as the County does not assign zoning designations for properties outside of the Unincorporated County areas. The City of Newport Beach has included the site property in its General Plan and zoning map, however County-owned properties in other jurisdictions are not subject to the local zoning (intergovernmental immunity). In California, the doctrine of intergovernmental immunity means that County public works projects and permit decisions are not required to follow local general plans. This includes zoning, subdivision approvals, use permits, and public works.

According to research conducted by the City of Newport Beach, a developer has expressed written and verbal interest in developing a portion of the site at 60 du/acre. However, the County is estimating much lower densities (6.08 du/ac) based on previous experience with similar sites. The assumed full buildout at this lower density is projected at 1,234 units. Nevertheless, as with past projects within incorporated jurisdictions, the County is open to sharing equal credit for the developed units. While these densities are not considered appropriate to accommodate housing for lower-income households, the County is committed to including 30% of its total unit share as affordable units (618 total units including 186 units set aside for deed-restricted, affordable housing for lower-income [10%] and moderate-income households [20%]). Program 3 includes the County's commitment to include a portion of affordable units (186 units) on this site. The City of Newport Beach has also identified the portion of the site that is suitable and feasible for structural and residential development. As with all development around former landfill sites, there are extensive processes and mitigation measures that must be taken to ensure safety. While siting buildings atop a landfill includes structural and environmental constraints, the interested developer believes both the structural and environmental constraints can be overcome with proven previously used techniques. The site would include methane mitigation systems ensuring the health and safety of future residents. An extensive analysis of site feasibility and site level due diligence has occurred on the site in consideration of the current environmental constraints. The analysis has concluded that the development potential (which is significantly higher than the development potential estimated in this site inventory) represents the most feasible opportunity for residential development. The identified site acreage suitable for residential development identified in the County's site inventory, therefore, is a conservative representation of site development potential.

The Coyote Canyon site is shown in **Figure B-11.**

Religious Institutions

Religious institutions sites are sites with churches or other religious institutions, with excess vacant property or large parking lots, that could accommodate residential development. SB 4, effective 2024, stipulates that faith-based organizations or nonprofit colleges must maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel. Throughout California, the development of affordable housing on religious properties has become an increasing trend. Nonprofit organizations such as Many Mansions and National CORE have assisted many religious facilities in incorporating housing on religious facility sites.

The County has identified nine religious institutions located in the Unincorporated County with potential for residential development. Three of those sites are located within the Housing Opportunity Overlay (HOO) and are discussed in a subsequent section describing sites that required rezoning. While those sites can be developed without rezoning, the HOO overlay provides additional development potential.

Presented here are the six religious institution sites that are located outside of the HOO and require no rezoning. For all six sites, no church buildings or driveway access areas are assumed to have development potential. These six sites were chosen because of the presence of unused undeveloped areas on their property, or because they had smaller portions of expansive parking or lawn areas that could be developed. Religious institutions with constraints, such as small size or limited parking/open areas, were either excluded or not selected from the analysis.

Combined, these six sites can yield 360 units on 12 acres of developable land. These churches can partner with nonprofit developers to provide affordable housing on the sites and receive parking relief to facilitate development. Because only affordable housing would qualify for the parking relief, the units are credited against the lower-income RHNA. If a density bonus was used, the number of units on the sites would increase significantly.

There has been significant expressed interest from church operations throughout Southern California to partner with nonprofit developers to provide affordable housing onsite. Typical development models involve churches providing a ground lease of the surplus or parking areas for affordable housing in exchange for lease payments, new facility, and/or affordable units for staff. An action (Program 4) is included in the Housing Plan for the City to support such opportunities.

Table B-5
Summary of Religious Institutions Sites (No Rezoning Needed)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
Calvary Chapel of the Canyons	Canyons	4.5	1.5	33%	30 du/ac	45	The church property has an undeveloped/unused area in the rear that is included in the inventory. The church building and parking area are not included in the inventory.
Holy Trinity Church	Ladera Ranch	7.2	1.0	14%	30 du/ac	30	The church property has a large parking lot (4.3 acres) and only a small portion of the lot (1 acre) is used to accommodate potential development. The church building and most of the parking area is not included in the inventory.
New Life Church	North Tustin	4.32	0.5	12%	30 du/ac	15	The church property includes a half-acre undeveloped/unused area on the side of the property that can accommodate development. Most of the site which includes a church building, parking lot, and a resources center for blind children is not included in the inventory.
St Michael's Abbey	Canyons	122	6.0	5%	30 du/ac	180	St. Michael's Abbey is a large seminary, monastery, and church. The property includes three large parcels spanning 122 acres. Only one parcel is included as it is a stand-alone parcel that is undeveloped. It is located across the street from the developed portion of the site. To account for potential site improvements, only 75% of a stand-alone, undeveloped parcel is included in the inventory.
The Church of Jesus Christ of Latter-day Saints	Ladera Ranch	6.4	2.0	31%	30 du/ac	60	The church property includes a large lawn with only a medium size picnic table shelter at the end closest to the church buildings. The lawn is large, just under four acres and only half of that area is included in the inventory. The church building, half the lawn with picnic area, and parking area are not included in the inventory.

RHNA Shortfall

The County can meet more than half (56%) of the RHNA with approved and proposed projects, two RHNA transfers, projected ADU development, and development of Rancho Mission Viejo, one County-owned site, and several religious institution sites. After accounting for this capacity, a shortfall of 4,623 units remains (**Table B-4**).

To address the shortfall, the County has identified various sites that, while appropriate for redevelopment and intensification, required zoning amendments that would increase residential

development potential and serve as a significant incentive for redevelopment. Once appropriate zoning actions are taken, the County can accommodate the remaining RHNA.

RHNA Shortfall Site Requirements

Sites that will be rezoned and used to address an unaccommodated, lower-income RHNA are subject to additional requirements under State law. Housing Element law (Government Code 65583.2[h]) requires that the County accommodate all the lower-income, unaccommodated RHNA on sites that are:

- Zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower-income households during the planning period; and
- Permit at least 16 units per site at a density of at least 20 units per acre
- At least half of the very low- and low-income housing need must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all the very low- and low-income housing need on sites designated for mixed-uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

Sites to accommodate the moderate- and above-moderate-income RHNA shortfall are *not* subject to these requirements. Sites that meet the density requirement but do not have a minimum capacity for 16 units are credited toward the moderate- and above-moderate-income RHNA shortfall.

Table B-6 summarizes the sites to be rezoned and shows that once appropriate zoning actions are taken, the County can adequately accommodate the remaining RHNA. While the table shows a deficit of 1,624 units for the low-income RHNA, those units can be addressed with the surplus of 1,983 units on very low-income sites. All sites credited to the lower-income RHNA meet the shortfall requirements consistent with Government Code 65583.2[h]. A complete summary of sites to be rezoned is presented on **Table B-6** and **Figures B2** to **B-14**. A detailed listing of sites is included in **Table B-8** as required by State law.

Sites Requiring Rezoning

The incorporation and build-out of south Orange County have shifted the focus of residential development that is under the jurisdiction of the County to the older Unincorporated islands in the northern portion of the county. The “first wave” of development in these areas occurred during the 1950s and ‘60s as suburban growth spread south from Los Angeles. Fifty years later a few scattered vacant parcels remain, but there is also significant potential for redevelopment of underutilized properties with higher-density housing. The County of Orange’s land inventory is

different from most jurisdictions as it is continually shrinking due to annexations from incorporated cities within the County. While this is a common practice, it serves to deplete the available land the County can identify within the Housing Element. The most recent annexation occurred in September 2022. Approximately 265 acres of undeveloped, Unincorporated land (Tonner Hills Annexation Extension CA 03-12A) was annexed to the City Brea and the certificate of completion was issued in September 2022. This site would have been included in the County's 6th Cycle Land Inventory. It is anticipated this land will be developed into a planned community or specific plan with more than 1,100 units including at least 10% affordable to low- and moderate-income households.

Housing Opportunities Overlay Zone

The 2000 Housing Element included a Housing Action Plan item to designate such areas for higher-density development, and in 2006 the Housing Opportunities Overlay Zone (HOO) was adopted. The Housing Opportunities Overlay Zone (section 7-9-44.6) provides the option of affordable multifamily development on commercial and industrial sites, and in 2008 the Housing Opportunities Overlay Zone was expanded to include properties that are conventionally zoned for multifamily development along arterial highways. The HOO requires that 100% of the units be reserved for lower-income households.

In 2020, the density of the HOO was increased from a maximum of 25 to 43.5 units per acre (not including density bonus units). In 2022, the maximum density of the HOO was again increased from 43.5 to 70 units per acre. Currently, the base density in all portions of the Housing Opportunities Overlay Zone is 70 units/acre. Program 1, most of which was completed 2024, amended the HOO to permit residential development at 70 dwelling units per acre for all zoning districts where it is permitted. To expand the opportunities for development of higher density, affordable housing, in 2024, the HOO was expanded to sites zoned multi-family residential, light industrial, and mixed-use and a 30 du/ac minimum density was implemented for all base zones within the HOO. Additionally, most of the base commercial zoning within the HOO was changed to Mixed-Use which does not allow for stand-alone non-residential uses and requires residential uses to comprise at least 50% of the total floor area. The County's commitment to facilitating and encouraging affordable housing development can be seen in these planning efforts.

As the County has an identified shortfall and the rezoning was done after the start of the 2021-2029 Housing Element Planning period, the following actions are considered a rezoning action even if they have already been completed:

- Increase the maximum density in the HOO to 70 du/ac

- Establish a minimum density in the Multifamily Dwellings (R2), Apartment (R3), Suburban Multifamily Residential (R4), Residential Profession (RP), or Mixed-Use (MX) zones of 30 dwelling units per acre
- Rezone properties with a zone designation of Local Business (C1), General Business (C2), Commercial Community (CC), Commercial Highway (CH), Commercial Neighborhood (CN), or Residential Profession (RP) to the new Mixed-Use (MX) zoning district
- Adding properties within the Multifamily Dwellings (R2), Apartment (R3), and Suburban Multifamily Residential (R4), Light Industrial (M1) and new Mixed-Use zoning districts to the Housing Opportunities Overlay (HOO), which provides opportunities and incentives for future affordable housing projects.

The 70 du/ac density for the HOO was determined based on discussions with the development community and others with local experience developing affordable housing within the County of Orange. This density allows increased flexibility in the type of development that may occur within these areas and presents additional opportunities for residential development. In July 2024, the County of Orange amended the associated development standards within the HOO to reflect development at 70 dwelling units per acre. Due to the nature of the HOO as described in this section, all candidate housing sites within the HOO can be developed as 100% affordable to lower-income households.

As reflected in **Table B-14**, the HOO has been very successful in stimulating affordable housing development, with 8 new residential projects approved since 2007 and one project currently under development. As shown on **Table B-14**, with every density increase, the densities of developed affordable housing increased proportionally. Since 2007, housing projects in the HOO have averaged over 100% of allowable density and have resulted in 371 new affordable housing units.

The three projects that have been developed or approved since the start of the 5th RHNA cycle (2014) have achieved development densities over 125% of maximum allowable density. In 2022, Casa Paloma, a 71 units affordable projects achieved a density of 254% of maximum allowable density at the time of its approval (25 du/ac).

- Potter's Lane is a 16-unit affordable project in Midway City that was developed on a site previously in use as a single-family home. The project was developed on a site under half an acre in size and achieved a density of 39 du/ac on a site that had a maximum allowed density of 25 du/ac.
- Casa Paloma, a 71-unit multifamily affordable housing apartment community in accordance with the Housing Opportunities Overlay Zone Regulations. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are

located within one-half mile of a major transit stop. The Casa Paloma project qualifies for the unlimited density bonus provision. The project's proximity to a major transit stop also permits use of modified parking standards. Government Code Section 65915 states that parking is not required for special needs housing and that the parking ratio shall not exceed 0.5 spaces per unit for the other affordable housing units. With these provisions, the project requires a total of 22 parking spaces, where a total of 28 parking spaces are provided. The project, approved in 2020, received its certificate of occupancy on September 29, 2022, and is currently in the pre-leasing process.

- Jackson Street, a 65-unit multifamily affordable housing apartment community in the Housing Opportunities Overlay Zone was developed at a density of 87.25 du/ac when the maximum allowed on the site was 70 du/ac. This is a density of 125% of the maximum allowed. Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project qualified for the unlimited density bonus provision. The project's proximity to a major transit stop also permits use of modified parking standards. The planning application for Jackson Street was approved in 2024.

Due to the small parcelization in older parts of the County such as in the Unincorporated islands, larger projects many times require lot consolidation. To incentivize affordable residential development, a graduated density increase is available for projects that consolidate multiple properties based on project size after lot consolidation.

- Less than 0.50 acre: 70 units per acre
- 0.50 to 0.99 acre: 77 units per acre (10% increase)
- acre or more: 84 units per acre (20% increase)

These densities apply to sites identified in the HOO regardless of base zoning density. As the County has increased the base density for R-2, R-3. R-4, and MX zones, all sites identified in the HOO require a 30 du/ac minimum density.

The HOO allows for residential development as a by-right use. All sites included in the site inventory allow affordable residential by-right and in the Mixed-Use District, stand-alone non-residential is not allowed. To facilitate the development of housing in the HOO, the Housing Opportunities Manual was created and provides guidelines for proposed projects and a description of the application submittal and review process. Along with development of the Housing Element and zoning amendments, the Housing Opportunities Manual has been updated to include minimum criteria, objective development standards, and clear procedural guidelines for all affordable housing projects.

Affordability is dependent on density allowed, capacity, and size. Sites allowing the State-designated default density standard (at least 30 du/ac) and meeting the shortfall requirement of accommodating at least 16 units are credited toward the lower-income RHNA. Sites meeting the default density standard (at least 30 du/ac) but under 0.5 acres in size are credited toward the moderate-income category as are sites that meet the density standard and are larger than 0.5 acres but cannot accommodate 16 units as required by the shortfall requirements. Realistic capacity methodology and affordability assumption are discussed after this section.

Table B-6
Summary of Rezoned Sites

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
HOO-Residential R-2	-	80	-	80
HOO-Residential R-3	103	39	-	142
HOO-Residential R-4	217	-	-	217
HOO-Mixed-Use	3,408	752	-	4,160
HOO-Other (M-1)	254	-	-	254
HOO Religious Institution Sites	284	-	-	284
Total	**4,266**	**871**	**-**	**5,137**
RHNA Shortfall	*3,905*	*718*	-	*4,623*
RHNA Status: +Surplus/(Shortfall)	**+361**	***+153***	**-**	***+514***

HOO - Underutilized Infill Parcels

The County has identified 150 parcels that can be grouped into 59 sites for redevelopment to add new housing or to redevelop with a significantly higher number of units. Only two parcels are vacant and as such this discussion focuses on underutilized sites. Combined, sites in the HOO can accommodate 4,853 units (3,982 lower-income units and 871 moderate-income units. Maximum allowable density (ranging from 77 to 84 du/ac) is assumed, and that approach is described in detail in the methodology section.

HOO with Residential Zoning:

- Three **HOO-R2** sites (five parcels) are included in the inventory and only one is comprised of multiple parcels (the three parcels are under common ownership). Although the three sites can accommodate at least 16 units, none are credited toward the lower-income RHNA as they are considered small sites (under 0.5 acres in size).
- Four **HOO-R3** sites (nine parcels) are included in the inventory and two of the sites are comprised of multiple parcels. The two multi-parcel sites are included as they are developed with single family units in an area where multifamily development is

predominant. These sites are larger than typical single-family properties of a size that can accommodate a multifamily development. The allowable HOO density allows for 13 to 25 times the number of current units developed. The two stand-alone sites are located along Bolsa Avenue and developed with older, less intense commercial uses with lower lot coverage and signs of deferred maintenance.

- Five **HOO-R4** sites (14 parcels) are included in the inventory and four of the sites are comprised of multiple parcels. These four multi-parcel sites are either fully or partially under common ownership (for example 5 parcels with two owners). The multi-parcel sites are included as they are developed with single family on relatively large lots (low lot coverage). One site has one unit over three parcels and limited lot improvement. Another site has 2 units over four parcels with large undeveloped areas. On the single-parcel site, the allowable HOO density allows for ten times the number of current units (4 units).

HOO with Mixed-Use Zoning:

- There are 42 **HOO-MX** sites (116 parcels) included in the inventory. Sixteen sites are single-parcel sites and 26 are multi-parcel sites. Thirteen of the multi-parcel sites are either fully or partially under common ownership (for example 5 parcels with two owners). To leverage the potential for development presented by the area's underutilization, the properties have been rezoned to the Mixed-Use district as part of the 2024 zoning amendment. Stand-alone residential uses are allowed in the mixed-use zone, but stand-alone non-residential development is not allowed, and all projects on the shortfall sites are required to include 50% residential uses. This approach addresses the issue of the potential for non-residential development and shows that the capacity identified is realistic and achievable.

  The largest grouping of HOO-MX sites is in the Midway City islands (generally near the corner of Bolsa Avenue and Beach Boulevard). In the area southeast of Bolsa and Beach, there are many underutilized properties in use as auto repair and smaller, independent auto sales businesses with large surface lot area for car storage. Along Bolsa Avenue, properties in use as commercial uses were identified as the uses were older, smaller scale with signs of deferred maintenance or lack of visual signs of improvements. This area is adjacent to residential uses on the north and east side and has seen increased interest in redevelopment. Three affordable, higher density, housing developments have been built or are under development (the 16-unit Potter's Lane project, the 71-unit Casa Paloma, and the 63-unit Jackson Street project). Due to the size of many of the sites, higher densities can be achievable for projects over a half-acre in size. Several sites north of the Bolsa Avenue frontage properties are selected due to their underutilization. The sites have single-family units but are in areas that are predominately multifamily. The sites are

located along or near two major regional roads (Bolsa Avenue and Beach Boulevard) and just one mile from I-405, which connects Orange County to major employment areas in Orange and Los Angeles counties. All sites in this area fall within a High-Quality Transit Area (HQTA) which provides additional incentives (parking relief) for development of high-density housing.

A second large grouping is in the Anaheim/Stanton Islands (generally north of Katella Avenue and west of Brookhurst Street). In this area, the sites are currently in use as small-scale commercial uses, many in uses as older, smaller-scale, strip commercial centers with large undeveloped areas for storage or parking, single family homes (in multifamily neighborhoods where development regulations allow a 10-to-20-fold increase in units). Most sites are located along or at the intersection of major roads which are ideal for high density development as it offers easier access to the site. Most of the sites in this area fall within a HQTA which provides additional incentives for development of high-density housing.

There are three HOO-MX sites, that are also stand-alone parcel sites with no lot consolidation assumed, that are over 4 acres in size and can be credited toward the lower-income RHNA. However, to account for the potential of mixed-income housing on these relatively larger sites, affordability for these three sites has been split between lower-income and moderate-income RHNA. This approach is described in detail in the methodology section.

HOO with Other Zoning:

- Two **HOO-M1** sites (3 parcels) are included in the inventory. The sites are large, and the current uses are commercial industrial businesses. The larger site (1.6 acres) has two small structures, and the rest is an unimproved lot area used to store old cars and truck containers. The sites are located at the edge of a residential area and next to a multifamily neighborhood. These two sites have the potential to accommodate 254 units (and potentially more if a density bonus is used). These two sites are the only non-residential, non-mixed-use sites but they are included as the size of the properties, location in a residential area, and easy regional access make them ideal for future housing development. For sites located within a commercial or industrial zoning district such as M-1, the site development standards for the R3 "Apartment" District apply except that the base density shall be 70 dwelling units per acre (net development area).

HOO Religious Institutions

The County has identified nine religious institutions located in the Unincorporated County area with potential for residential development. Six of those sites are located outside the HOO and have been discussed previously. The three religious institutions sites presented here are located

within the Housing Opportunity Overlay (HOO) and while those sites can be developed without rezoning (at 30 du/ac density consistent with state law), the HOO overlay provides additional development potential.

For all sites, no church buildings or driveways access areas are assumed to have development potential. These three sites were chosen because that had unused/undeveloped areas on their property, or because they had smaller portions of expansive parking or lawn areas that could be developed. Religious institutions with constraints, such as small size or limited parking/open areas, were either excluded or not selected from the analysis.

Combined, these three sites can yield 283 units on 3.4 acres of developable land. Maximum allowable density (ranging from 77 to 84 du/ac) is assumed, and that approach is described in detail in the methodology section. These churches can partner with nonprofit developers to provide affordable housing on the sites and receive parking relief to facilitate development. Because only affordable housing would qualify for the parking relief, the units are credited against the lower-income RHNA. If a density bonus was used, the number of units on the sites would increase significantly.

As stated earlier, there has been significant expressed interest from church operations throughout Southern California to partner with nonprofit developers to provide affordable housing onsite. Typical development model involves the church to provide a ground lease of the surplus or parking areas for affordable housing in exchange for lease payments, new facility, and/or affordable units for staff. An action (Program 4) is included in the Housing Plan for the County to support such opportunities.

Table B-7
Summary of Religious Institutions Sites (HOO Rezoning)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
Bethlehem Evangelical	Rossmoor	2.1	1	47%	77-84 du/ac (2 parcels)	89	The property includes a church building with parking lots on both sides and a small lawn. Only half the site is included, which leaves room for the parking lot on one half of the property. The church buildings, small lawn and a portion of the parking area is not included in the inventory.
La Purisima Church	El Modena	7.8	1.8	23%	84 du/ac	153	This is a large (7 parcel) property with a church, school and other buildings. The property also includes a large parking lot and a lawn. Only the northernmost, stand-alone, 1.8-acre parcel is included in the inventory, and it is currently used as a lawn and a small portion of parking. lot. Due to the size of the property, there are ample parking lots which would provide flexibility for placement of a residential component. The

Table B-7
Summary of Religious Institutions Sites (HOO Rezoning)

Name	County Area	Total Property Size (acres)	Developable Area (acres)	% of Total Site	Max. Density Allowed	Total Capacity	Site Details
							church and school buildings and most of the parking area is not included in the inventory.
Saint Justin Martyr Church - Sacred Mission	Anaheim Stanton	1.1	0.5	48%	77 du/ac	41	The church property is made up of two non-adjacent parcels. Only one parcel is included in the inventory as it is used only for parking. The church is small, and its primary use is a food pantry. The church and food pantry buildings are not included in the inventory.

RHNA Status

The sites inventory identified in this chapter (including sites that required rezoning actions) totals 10,281 units, 4,853 units of which are in the very low- and low-income RHNA categories. Overall, the County can adequately accommodate—and have excess capacity—to accommodate the RHNA as all rezoning actions are completed (July 2024).

Compliance with State Law

Reuse of 5th Cycle Sites

Vacant sites identified in the previous two Housing Elements and non-vacant sites identified in the previous Housing Element are subject to the reuse provisions of Government Code 65583.2(c). The code requires that these previously used, lower-income sites be zoned at residential densities consistent with the default density established by HCD (30 units per acre) and the site allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households. All lower-income sites that were previously used are identified in **Table B-8.** All these sites have been rezoned as part of the County's 2024 zoning amendments to require a 30 du/ac minimum density and allow affordable housing by-right for projects with at least 20% as part of the RHNA shortfall requirements. Non-vacant sites identified in the previous Housing Element but credited toward the moderate- or above-moderate-income RHNA in the current Housing Element are not subject to the reuse provisions.

Moderate and Above Moderate Income Site Requirement

For jurisdictions that are considered Metropolitan, State law requires that the element identify at least 25 percent of the remaining moderate- and above-moderate- RHNA on sites that allow at least four units of housing (e.g., four-plex or greater). (Gov. Code, § 65583.2, subd. (c)(4).) After

accounting for projects completed or under development, RHNA transfers, and ADU production, the remaining moderate need is 1,842 units, and the remaining above-moderate need is 1,786 units. There is capacity for 871 units in HOO residential and mixed-use zones to accommodate more than 25% (461 units) of the remaining moderate-income need. These sites require a minimum density of 30 du/ac and all sites can accommodate more than 4 units. The remaining above-moderate-income need is addressed through development of the Rancho Mission Viejo Master Plan and one County-owned site, Coyote Canyon that have a combined capacity of over 4,700 units. Both sites allow a variety of housing types.

No Net Loss

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify at the time of approval the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project.

Site Inventory Table and Maps

Table B-8 presents a detailed listing of each candidate housing site within the County of Orange's sites inventory and **Figures B-2** to **B-14** show the locations. The sites are identified by assessor parcel number (APN) as well as a unique identifier used to track sites (which may include more than one parcel) within the inventory. The site inventory methodology is discussed after this section.

Table B-8
Orange County Candidate Housing Site Inventory

Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
												Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
BA	HOO - M1	Orange/Olive	360-382-18	1.61	OLIVE AND MAIN ST	Res 1B	M1	No Change	Commercial	30	84	135	0	0	135	NO	N
BB	HOO - M1	Orange/Olive	360-384-04	0.70	2875 N ORANGE OLIVE RD	Res 1B	M1	No Change	Commercial	30	77	54	0	0	54	NO	N
BB	HOO - M1	Orange/Olive	360-384-05	0.84	2911 N ORANGE OLIVE RD	Res 1B	M1	No Change	Commercial	30	77	65	0	0	65	NO	Y
C	HOO - MX	Anaheim/Stanton	127-241-35	0.26	791 W STONYBROOK DR	Res 1B	C1	MX	Commercial	30	70	0	18	0	18	NO	N
D	HOO - MX	Anaheim/Stanton	127-242-18	0.26	801 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	70	0	18	0	18	NO	N
E	HOO - MX	Anaheim/Stanton	126-503-27	0.45	8885 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	0	31	0	31	YES	Y
F	HOO - MX	Anaheim/Stanton	127-092-24	0.59	331 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	77	45	0	0	45	NO	Y
F	HOO - MX	Anaheim/Stanton	127-092-25	0.56	9291 S BROOKHURST	Res 1B	C1	MX	Commercial	30	77	43	0	0	43	NO	Y
F	HOO - MX	Anaheim/Stanton	127-092-32	1.06	305 S BROOKHURST ST	Res 1B	C1	MX	Commercial	30	84	89	0	0	89	NO	Y
G	HOO - MX	Anaheim/Stanton	127-341-59	0.20	10012 GILBERT ST	Res 1B	C1	MX	Residential, 1 unit	30	70	14	0	0	14	NO	N
G	HOO - MX	Anaheim/Stanton	127-341-60	0.38	10042 GILBERT ST	Res 1B	C1	MX	Residential, 1 unit	30	70	27	0	0	27	NO	N
G	HOO - MX	Anaheim/Stanton	127-341-61	0.13	9512 BALL RD	Res 1B	C1	MX	Commercial	30	70	9	0	0	9	NO	N
H	HOO - MX	Anaheim/Stanton	127-621-08	0.47	9041 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	33	0	0	33	YES	N
H	HOO - MX	Anaheim/Stanton	127-621-09	0.23	10962 MAGNOLIA AVE	Res 1B	C1	MX	Commercial	30	70	16	0	0	16	YES	N
H	HOO - MX	Anaheim/Stanton	127-621-10	0.34	9001 KATELLA AVE	Res 1B	C1	MX	Commercial	30	70	24	0	0	24	YES	Y
N	HOO - MX	El Modena	393-390-12	7.82	10000 CRAWFORD CANYON RD	Res 1B	CC	MX	Commercial	30	84	164	164	0	328	NO	N
O	HOO - MX	El Modena	393-390-13	2.23	10000 CRAWFORD CANYON RD	Res 1B	CC	MX	Commercial	30	84	187	0	0	187	NO	N
P	HOO - MX	El Modena	093-114-01	0.38	11924 EARLHAM ST	Res 1B	C1	MX	Commercial	30	70	0	26	0	26	YES	N
Q	HOO - MX	El Modena	093-113-10	0.17	11941 EARLHAM ST	Res 1B	C2	MX	Commercial	30	70	12	0	0	12	YES	N
Q	HOO - MX	El Modena	093-113-15	0.17	18541 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	12	0	0	12	YES	N
Q	HOO - MX	El Modena	093-113-21	0.63	18511 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	77	48	0	0	48	YES	N
Q	HOO - MX	El Modena	093-113-23	0.13	18551 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	9	0	0	9	YES	N
Q	HOO - MX	El Modena	093-113-25	0.13	18561 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	9	0	0	9	YES	N
Q	HOO - MX	El Modena	093-113-27	0.26	18571 E CHAPMAN AVE	Res 1B	C2	MX	Commercial	30	70	18	0	0	18	YES	N
AA	HOO - MX	Midway City	097-144-08	0.17	8421 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
AA	HOO - MX	Midway City	097-144-09	0.20	8441 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	14	0	0	14	YES	Y
AA	HOO - MX	Midway City	097-144-19	0.27	8451 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	19	0	0	19	YES	Y
AB	HOO - MX	Midway City	097-132-15	0.21	8101 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	15	0	0	15	YES	Y
AB	HOO - MX	Midway City	097-132-23	0.17	8061 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
AB	HOO - MX	Midway City	097-132-24	0.16	8071 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
AB	HOO - MX	Midway City	097-132-25	0.08	8081 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	6	0	0	6	YES	N
AB	HOO - MX	Midway City	097-132-25	0.08	8081 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	6	0	0	6	YES	N
AC	HOO - MX	Midway City	107-153-10	0.23	15022 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	0	16	0	16	YES	N
AC	HOO - MX	Midway City	107-153-11	0.11	8042 BOLSA	Comm 2A	C2	MX	Commercial	30	70	0	8	0	8	YES	N

Table B-8
Orange County Candidate Housing Site Inventory

Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
												Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
AC	HOO - MX	Midway City	107-153-12	0.11	15022 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	0	8	0	8	YES	N
AD	HOO - MX	Midway City	107-180-03	0.59	15032 JACKSON ST	Res 1C	C2	MX	Commercial	30	77	45	0	0	45	YES	N
AD	HOO - MX	Midway City	107-180-24	0.36	8122 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	25	0	0	25	YES	Y
AD	HOO - MX	Midway City	107-180-28	0.24	8180 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	17	0	0	17	YES	Y
AE	HOO - MX	Midway City	107-152-12	0.42	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	30	0	0	30	YES	N
AE	HOO - MX	Midway City	107-152-12	0.39	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	27	0	0	27	YES	N
AE	HOO - MX	Midway City	107-152-12	0.15	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	11	0	0	11	YES	N
AE	HOO - MX	Midway City	107-152-12	0.17	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	12	0	0	12	YES	N
AE	HOO - MX	Midway City	107-152-12	0.17	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	12	0	0	12	YES	N
AE	HOO - MX	Midway City	107-152-12	0.18	15040 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	N
AF	HOO - MX	Midway City	107-151-42	0.23	15052 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	16	0	0	16	YES	N
AF	HOO - MX	Midway City	107-151-54	0.31	15041 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
AF	HOO - MX	Midway City	107-151-68	0.19	15062 ADAMS ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	N
AF	HOO - MX	Midway City	107-151-68	0.18	15062 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	N
AG	HOO - MX	Midway City	097-142-22	0.30	8301 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	21	0	0	21	YES	Y
AG	HOO - MX	Midway City	097-142-23	0.45	8331 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	31	0	0	31	YES	Y
AH	HOO - MX	Midway City	142-062-15	0.35	15451 BEACH BLVD	Res 1B	C1	MX	Commercial	30	70	25	0	0	25	YES	Y
AH	HOO - MX	Midway City	142-062-17	2.26	15401 BEACH BLVD	Res 1B	C1	MX	Commercial	30	84	190	0	0	190	YES	N
AH	HOO - MX	Midway City	142-062-18	0.55	15441 BEACH BLVD	Res 1B	C1	MX	Commercial	30	77	43	0	0	43	YES	N
AI	HOO - MX	Midway City	107-151-02	0.31	15021 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
AI	HOO - MX	Midway City	107-151-06	0.19	15032 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
AI	HOO - MX	Midway City	107-151-55	0.17	15031 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
AI	HOO - MX	Midway City	107-151-56	0.25	15012 MIDWAY PL	Comm 2A	C2	MX	Commercial	30	70	18	0	0	18	YES	N
AJ	HOO - MX	Midway City	107-180-25	0.62	15062 JACKSON ST	Res 1C	C2	MX	Commercial	30	77	48	0	0	48	YES	Y
AJ	HOO - MX	Midway City	107-180-33	0.19	15081 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
AJ	HOO - MX	Midway City	107-180-34	0.19	15082 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
AK	HOO - MX	Midway City	107-151-15	0.41	15161 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
AK	HOO - MX	Midway City	107-151-37	0.19	15101 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
AK	HOO - MX	Midway City	107-151-38	0.28	15111 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	20	0	0	20	YES	Y
AK	HOO - MX	Midway City	107-151-45	0.40	15135 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	28	0	0	28	YES	Y
AK	HOO - MX	Midway City	107-151-47	0.34	15132 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	24	0	0	24	YES	Y
AK	HOO - MX	Midway City	107-151-48	0.28	15131 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	20	0	0	20	YES	Y
AK	HOO - MX	Midway City	107-151-51	0.32	15114 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	22	0	0	22	YES	Y
AK	HOO - MX	Midway City	107-151-52	0.16	15092 ADAMS ST	Comm 2A	C2	MX	Commercial	30	70	11	0	0	11	YES	Y
AL	HOO - MX	Midway City	107-180-09	0.37	15132 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	26	0	0	26	YES	Y
AL	HOO - MX	Midway City	107-180-10	0.37	15142 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	26	0	0	26	YES	Y

Table B-8
Orange County Candidate Housing Site Inventory

Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
												Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
AL	HOO - MX	Midway City	107-180-29	0.19	15112 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
AL	HOO - MX	Midway City	107-180-30	0.19	15111 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	13	0	0	13	YES	Y
AM	HOO - MX	Midway City	107-151-20	0.41	15201 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
AM	HOO - MX	Midway City	107-151-21	0.41	15211 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
AM	HOO - MX	Midway City	107-151-67	0.14	15300 BEACH BLVD	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
AM	HOO - MX	Midway City	107-151-67	0.14	15300 BEACH BLVD	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
AM	HOO - MX	Midway City	107-151-67	0.55	15300 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	77	42	0	0	42	YES	N
AN	HOO - MX	Midway City	107-151-30	0.41	15212 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
AN	HOO - MX	Midway City	107-151-59	0.28	15232 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	19	0	0	19	YES	N
AO	HOO - MX	Midway City	107-180-14	0.14	15231 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
AO	HOO - MX	Midway City	107-180-15	0.30	15222 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	21	0	0	21	YES	Y
AO	HOO - MX	Midway City	107-180-16	0.15	8161 ELMORE WAY	Res 1C	C2	MX	Residential, 2 units	30	70	11	0	0	11	YES	Y
AO	HOO - MX	Midway City	107-180-17	0.15	15232 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	11	0	0	11	YES	Y
AP	HOO - MX	Midway City	107-151-31	0.41	15122 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
AP	HOO - MX	Midway City	107-151-32	0.41	15142 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
AP	HOO - MX	Midway City	107-151-33	0.41	15132 BEACH BLVD	Comm 2A	C2	MX	Commercial	30	70	29	0	0	29	YES	Y
AQ	HOO - MX	Midway City	107-151-19	0.41	15191 JACKSON ST	Comm 2A	C2	MX	Residential, 1 unit	30	70	29	0	0	29	YES	Y
AQ	HOO - MX	Midway City	107-151-43	0.21	15180 JACKSON ST	Comm 2A	C2	MX	Commercial	30	70	14	0	0	14	YES	Y
AQ	HOO - MX	Midway City	107-151-44	0.21	15181 JACKSON ST	Res 1C	C2	MX	Residential, 1 unit	30	70	14	0	0	14	YES	Y
AR	HOO - MX	Midway City	107-180-31	0.57	15201 VAN BUREN ST	Res 1C	C2	MX	Commercial	30	77	44	0	0	44	YES	Y
AR	HOO - MX	Midway City	107-180-32	0.17	15202 JACKSON ST	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
AS	HOO - MX	Midway City	097-134-09	0.17	8181 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
AS	HOO - MX	Midway City	097-134-10	0.14	8191 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
AS	HOO - MX	Midway City	097-134-12	0.17	8225 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	12	0	0	12	YES	Y
AS	HOO - MX	Midway City	097-134-25	0.25	8207 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	17	0	0	17	YES	Y
V	HOO - MX	Midway City	097-103-31	0.85	14582 BEACH BLVD	Res 1C	C2	MX	Commercial	30	77	66	0	0	66	YES	Y
W	HOO - MX	Midway City	097-133-21	0.41	8121 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	0	29	0	29	YES	Y
X	HOO - MX	Midway City	144-251-08	0.44	16292 S HARBOR BLVD	Res 1C	C1	MX	Commercial	30	70	0	31	0	31	YES	Y
Y	HOO - MX	Midway City	097-141-09	0.15	8241 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
Y	HOO - MX	Midway City	097-141-10	0.15	8249 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
Y	HOO - MX	Midway City	097-141-11	0.15	8261 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
Y	HOO - MX	Midway City	097-141-12	0.15	8271 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
Y	HOO - MX	Midway City	097-141-13	0.15	8295 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
Z	HOO - MX	Midway City	097-143-10	0.15	8371 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
Z	HOO - MX	Midway City	097-143-11	0.15	8381 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y
Z	HOO - MX	Midway City	097-143-12	0.15	8391 BOLSA AVE	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	Y

Table B-8
Orange County Candidate Housing Site Inventory

Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
												Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
Z	HOO - MX	Midway City	097-143-13	0.15	14951 HARPER ST	Res 1C	C2	MX	Commercial	30	70	10	0	0	10	YES	N
BC	HOO - MX	Orange/Olive	360-031-23	5.12	15777 E LINCOLN AVE	Res 1B	C2	MX	Commercial	30	84	215	215	0	430	NO	Y
BD	HOO - MX	Orange/Olive	360-011-12	2.31	15631 E LINCOLN AVE	Res 1B	CH	MX	Commercial	30	84	194	0	0	194	NO	Y
BI	HOO - MX	Rossmoor	086-521-24	0.52	11171 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	77	40	0	0	40	NO	N
BJ	HOO - MX	Rossmoor	086-521-23	1.13	11131 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	84	95	0	0	95	NO	N
BK	HOO - MX	Rossmoor	086-521-46	1.35	11031 LOS ALAMITOS BLVD	Res 1B	C1	MX	Commercial	30	84	113	0	0	113	NO	N
BL	HOO - MX	Rossmoor	086-521-48	4.47	11081 LOS ALAMITOS BLVD	Res 1B	C2	MX	Commercial	30	84	188	188	0	376	NO	N
BN	HOO - MX	Yorba Linda Fairmont	349-693-39	0.51	CA-90 and ESPERANZA	Res 1B	CH	MX	Vacant	30	77	40	0	0	40	NO	N
BO	HOO - MX	Yorba Linda Fairmont	349-071-21	0.25	19651 ESPERANZA RD	Res 1B	C1	MX	Residential, 1 unit	30	70	18	0	0	18	NO	Y
BO	HOO - MX	Yorba Linda Fairmont	349-071-24	0.24	19721 ESPERANZA RD	Res 1B	C1	MX	Commercial	30	70	17	0	0	17	NO	Y
BO	HOO - MX	Yorba Linda Fairmont	349-071-25	0.30	19741 ESPERANZA RD	Res 1B	C1	MX	Residential, 1 unit	30	70	21	0	0	21	NO	Y
BO	HOO - MX	Yorba Linda Fairmont	349-071-26	0.49	19701 ESPERANZA RD	Res 1B	C1	MX	Commercial	30	70	34	0	0	34	NO	Y
I	HOO - R2	Anaheim/Stanton	127-562-01	0.26	10741 GARZA AVE	Res 1B	R2D	R2	Vacant	30	70	0	18	0	18	YES	N
J	HOO - R2	Anaheim/Stanton	127-573-21	0.26	10961 GILBERT ST	Res 1B	R2D	R2	Residential, 1 unit	30	70	0	18	0	18	YES	N
J	HOO - R2	Anaheim/Stanton	127-573-22	0.12	9441 KATELLA AVE	Res 1B	R2D	R2	Commercial	30	70	0	8	0	8	YES	N
J	HOO - R2	Anaheim/Stanton	127-573-23	0.06	9441 KATELLA AVE	Res 1B	R2D	R2	Commercial	30	70	0	4	0	4	YES	N
AT	HOO - R2	Midway City	142-031-26	0.46	7852 BOLSA AVE	Res 1C	R2	No Change	Commercial	30	70	0	32	0	32	YES	N
AU	HOO - R3	Midway City	097-132-16	0.37	14941 JACKSON ST	Res 1C	R3	No Change	Commercial	30	70	0	26	0	26	YES	N
AV	HOO - R3	Midway City	097-133-08	0.19	14942 JACKSON ST	Res 1C	R3	No Change	Commercial	30	70	0	13	0	13	YES	N
AW	HOO - R3	Midway City	097-134-01	0.18	14862 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
AW	HOO - R3	Midway City	097-134-04	0.18	14892 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
AW	HOO - R3	Midway City	097-134-26	0.36	14872 VAN BUREN ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	25	0	0	25	YES	N
AX	HOO - R3	Midway City	097-142-14	0.18	14941 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
AX	HOO - R3	Midway City	097-142-15	0.18	14931 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
AX	HOO - R3	Midway City	097-142-16	0.18	14921 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
AX	HOO - R3	Midway City	097-142-17	0.18	14901 WILSON ST	Res 1C	R3	No Change	Residential, 1 unit	30	70	13	0	0	13	YES	N
R	HOO - R4	El Modena	383-061-01	0.51	11578 HEWES ST	Res 1B	R1	R4	Residential 4 units	30	77	40	0	0	40	YES	N
BE	HOO - R4	Orange/Olive	360-364-03	0.18	8621 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	13	0	0	13	NO	N
BE	HOO - R4	Orange/Olive	360-364-04	0.15	16721 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	N
BE	HOO - R4	Orange/Olive	360-364-05	0.15	16711 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y

Table B-8
Orange County Candidate Housing Site Inventory

Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
												Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
BE	HOO - R4	Orange/Olive	360-364-06	0.15	16701 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y
BE	HOO - R4	Orange/Olive	360-364-07	0.15	16691 E BUENA VISTA AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	10	0	0	10	NO	Y
BF	HOO - R4	Orange/Olive	360-364-01	0.40	8571 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	28	0	0	28	NO	Y
BF	HOO - R4	Orange/Olive	360-364-02	0.18	8581 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	13	0	0	13	NO	N
BG	HOO - R4	Orange/Olive	360-365-01	0.17	8631 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
BG	HOO - R4	Orange/Olive	360-365-02	0.17	8641 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
BG	HOO - R4	Orange/Olive	360-365-03	0.17	8651 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	12	0	0	12	NO	N
BH	HOO - R4	Orange/Olive	360-361-09	0.20	8582 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	14	0	0	14	NO	Y
BH	HOO - R4	Orange/Olive	360-361-11	0.24	8500 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	17	0	0	17	NO	N
BH	HOO - R4	Orange/Olive	360-361-12	0.24	8500 OCEANVIEW AVE	Res 1B	R4	No Change	Residential, 1 unit	30	70	16	0	0	16	NO	N
BM	HOO CHURCH - MX	Rossmoor	086-521-11	0.95	11088 WALLINGSFORD RD	Res 1B	C2	MX	Educational/institutional/religious	0	84	40	0	0	40	NO	N
BM	HOO CHURCH - MX	Rossmoor	086-521-19	1.17	3352 KATELLA AVE	Res 1B	C2	MX	Educational/institutional/religious	0	84	49	0	0	49	NO	N
K	HOO CHURCH - R2	Anaheim/Stanton	127-572-25	0.53	10841 HARCOURT AVE	Res 1B	R2D	R2	Educational/institutional/religious	0	77	41	0	0	41	YES	N
S	HOO CHURCH - R4	El Modena	383-061-02	1.83	11712 Hewes St	Res 1B	R1	R4	Educational/institutional/religious	0	84	154	0	0	154	YES	N
L	NON HOO - CHURCH	Canyons	105-060-26	4.49	8002 SILVERADO CANYON RD	Res 1A	A1	No Change	Educational/institutional/religious	0	84	45	0	0	45	NO	N
M	NON HOO - CHURCH	Canyons	105-051-84	8.28	27977 SILVERADO CANYON RD	Res 1A	A1	No Change	Educational/institutional/religious	0	84	180	0	0	180	NO	N
T	NON HOO - CHURCH	Ladera Ranch	780-241-06	7.23	1600 CORPORATE DR	UAC 6	SP	No Change	Educational/institutional/religious	0	84	30	0	0	30	NO	N
U	NON HOO - CHURCH	Ladera Ranch	780-041-01	6.39	26176 ANTONIO PKWY	Res 1B	SP	No Change	Educational/institutional/religious	0	84	60	0	0	60	NO	N
AY	NON HOO - CHURCH	North Tustin	401-171-05	4.32	18542 VANDERLIP AVE	Res 1B	SP - PQP	No Change	Educational/institutional/religious	0	84	15	0	0	15	NO	N
A	COYOTE CANYON	Newport Beach	120-571-11	15.54	CA-73 and Newport Coast Dr	N/A	N/A	N/A	vacant former landfill	0	0	0	0	0	0	NO	N
A	COYOTE CANYON	Newport Beach	120-571-13	335.07	CA-73 and Newport Coast Dr	N/A	N/A	N/A	vacant former landfill	0	0	62	124	432	618	NO	N
AZ	NON HOO - CHURCH	North Tustin	395-401-02	9.41	13922 PROSPECT AVE	Res 1B	R1	No Change	Educational/institutional/religious	0	84	30	0	0	30	NO	N
B	RMV Master Plan	Mission Viejo	125-165-34	62.38	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	165	1000	3001	4166	NO	N
B	RMV Master Plan	Mission Viejo	125-165-35	63.67	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-36	63.67	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.40	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	NA	0	0	0	0	0	NO	N

Table B-8
Orange County Candidate Housing Site Inventory

Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
												Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
B	RMV Master Plan	Mission Viejo	125-165-51	62.33	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.02	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.40	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.30	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	63.06	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.14	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.00	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.65	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	63.53	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	64.98	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	62.37	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	62.38	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	60.80	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	62.82	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	61.02	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	62.39	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	63.68	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	60.79	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	63.68	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-42	62.23	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.23	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	52.47	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	62.48	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-51	168.88	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	60.61	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N

Table B-8
Orange County Candidate Housing Site Inventory

Site ID	Site Type	Location	APN	Size (acres)	Address	General Plan Land Use	Previous Zoning	Current Zoning (as of July 2024)	Existing Land Use	Minimum Allowed Density	Maximum Allowed Density	Potential Units by Income			Total Units	Located in a HQTA	Used in 4th/5th Cycle
												Very Low- and Low-Income Units	Moderate Income	Above Moderate Income			
B	RMV Master Plan	Mission Viejo	125-165-52	60.49	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	63.69	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N
B	RMV Master Plan	Mission Viejo	125-165-52	62.01	CA-74 and Antonio Pkwy	RMV Res 1B, 6, 5	PC	No Change	Vacant	0	0	0	0	0	0	NO	N

Figure B-2
County of Orange Candidate Sites
Unincorporated Area: Orange/Olive

Figure B-3
County of Orange Candidate Sites
Unincorporated Area: Anaheim (Area 1)

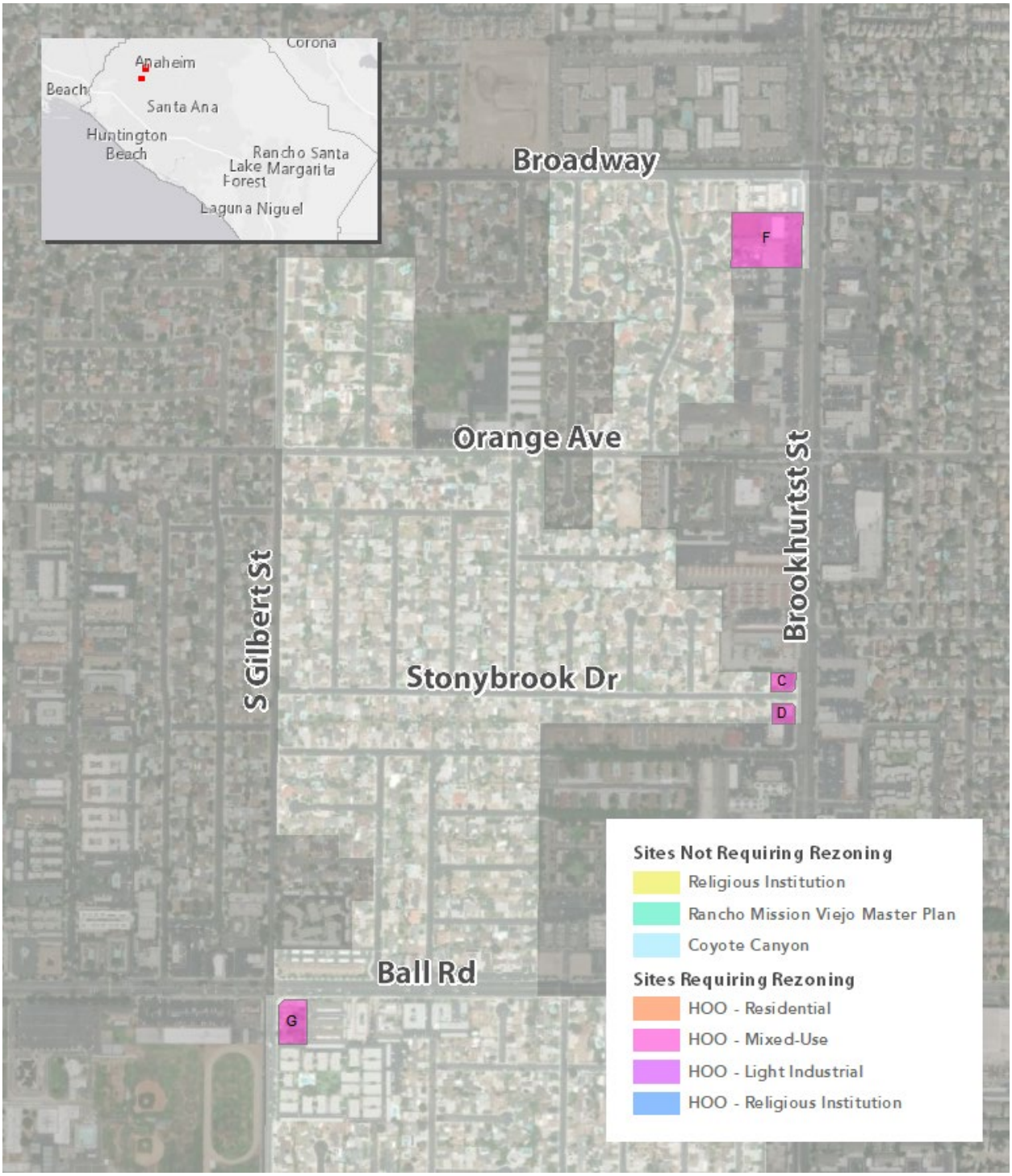


Figure B-4
County of Orange Candidate Sites
Unincorporated Area: Anaheim (Area 2)

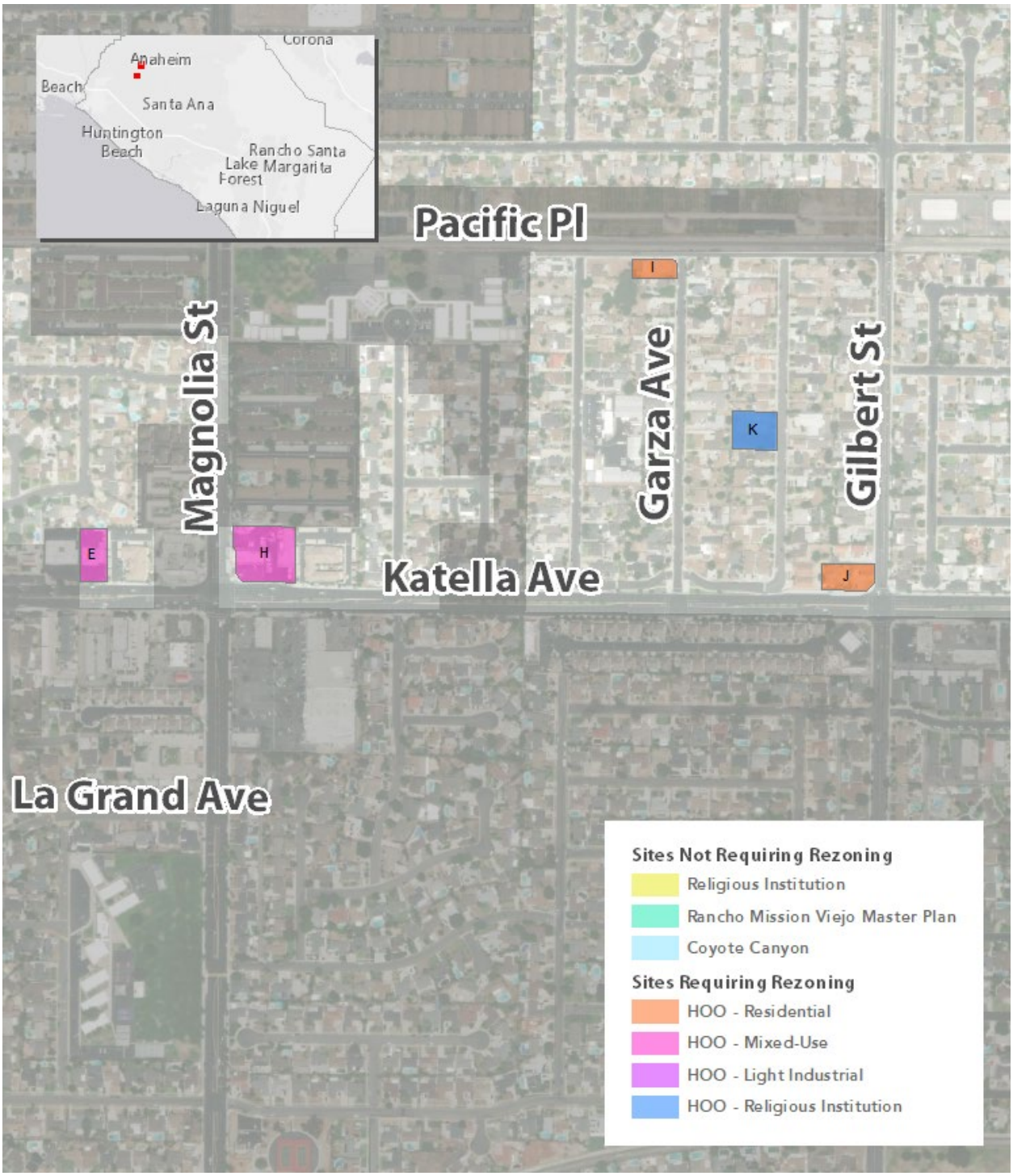


Figure B-5
County of Orange Candidate Sites
Unincorporated Area: El Modena

Figure B-6
County of Orange Candidate Sites
Unincorporated Area: Midway City (Area 1)

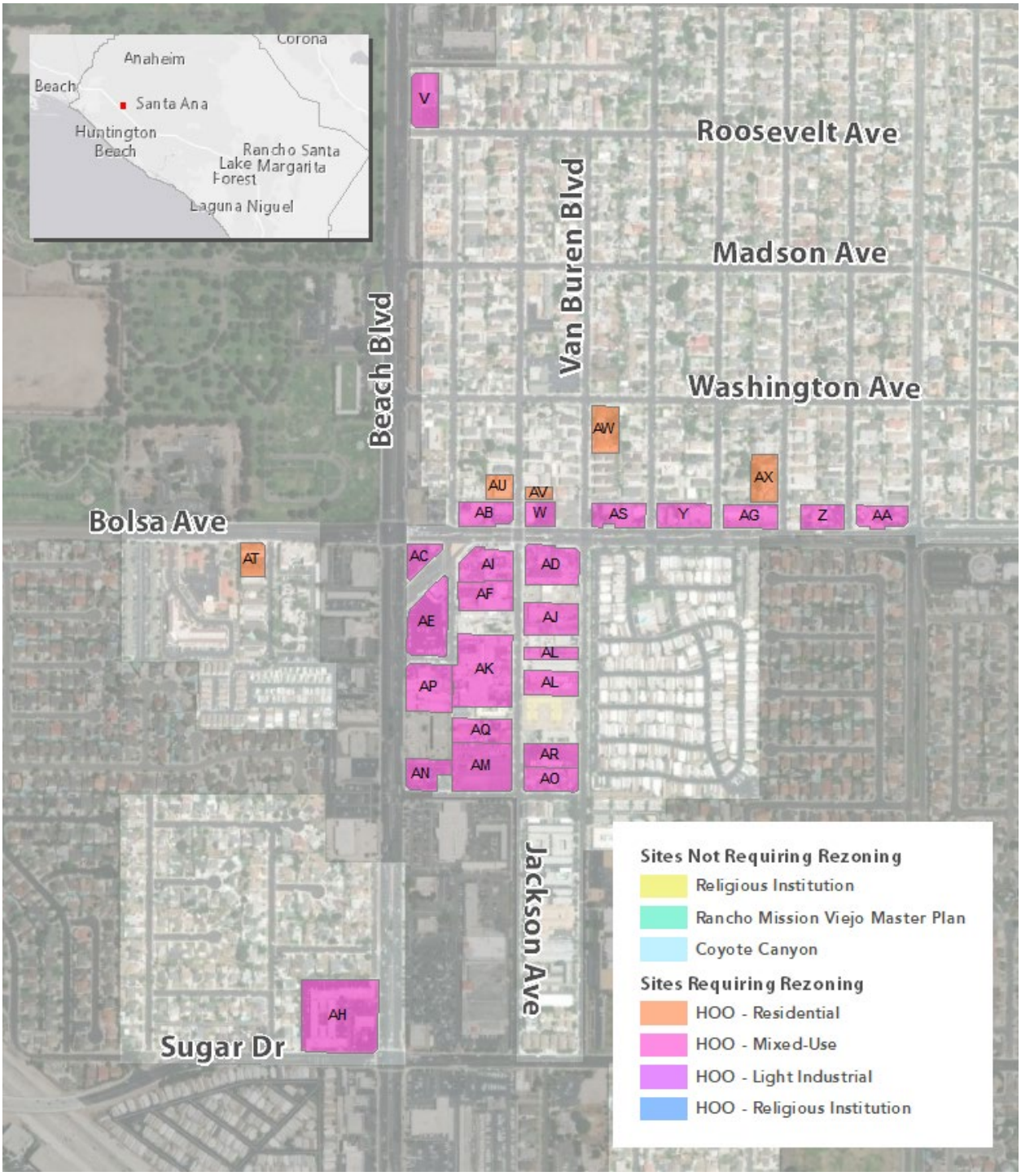


Figure B-7
County of Orange Candidate Sites
Unincorporated Area: Midway (Area 2)

Figure B-8
County of Orange Candidate Sites
Unincorporated Area: Rossmoor

Figure B-9
County of Orange Candidate Sites
Unincorporated Area: Yorba Linda Fairmont

Figure B-10
County of Orange Candidate Sites
Unincorporated Area: CHUF Canyons

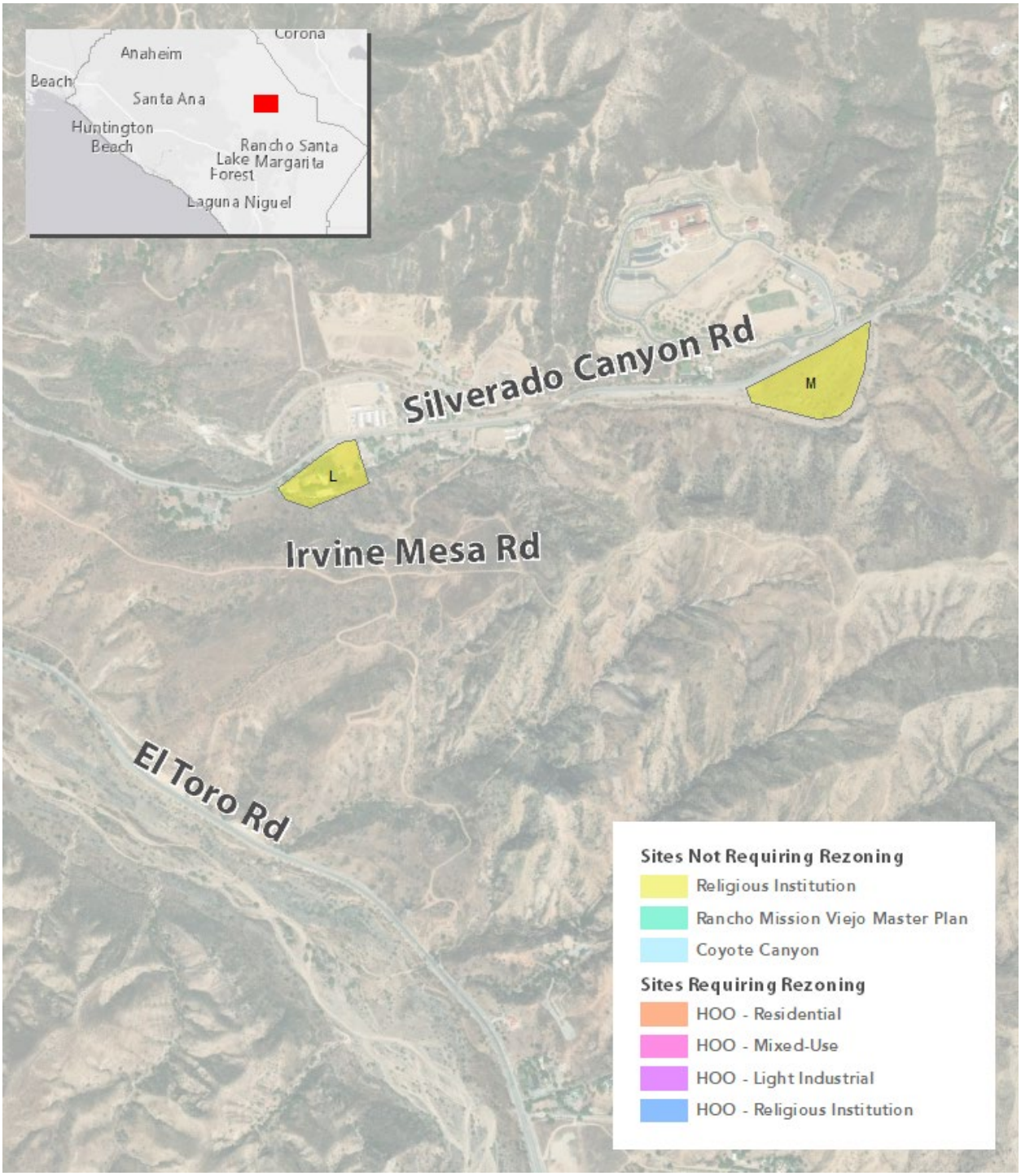


Figure B-11
County of Orange Candidate Sites
Unincorporated Area: Coyote Canyon

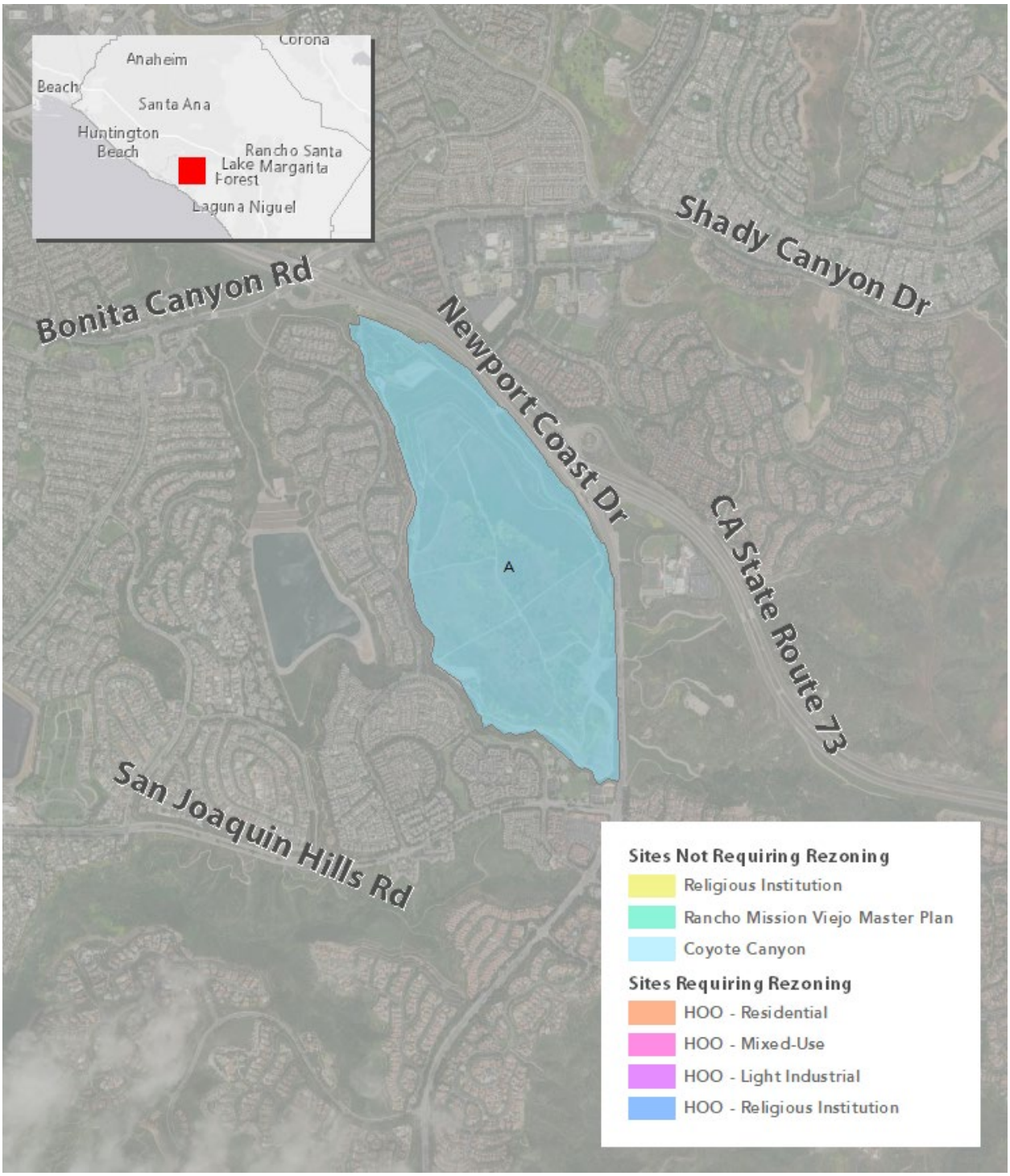


Figure B-12
County of Orange Candidate Sites
Unincorporated Area: CHUF Ladera Ranch

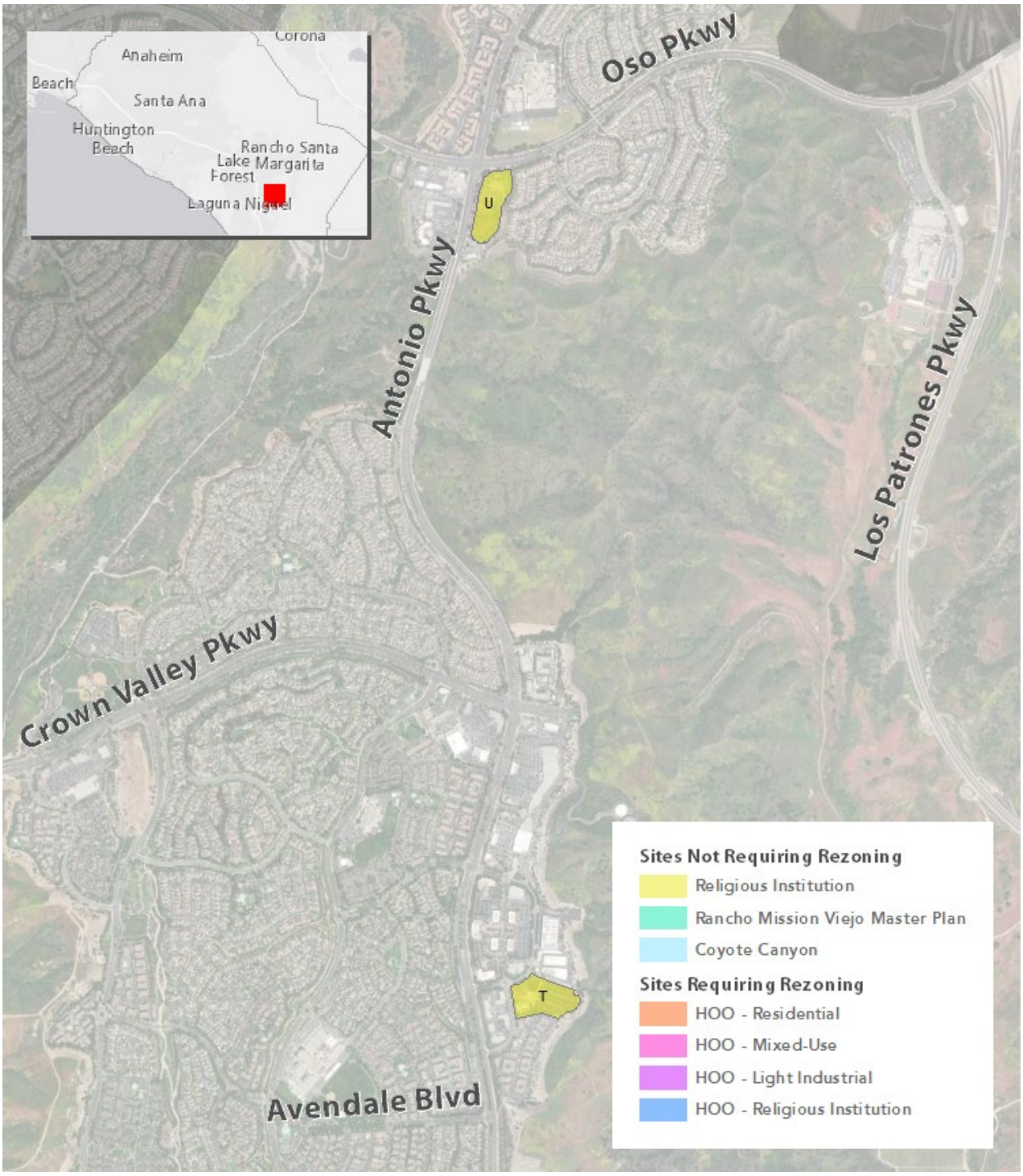


Figure B-13
County of Orange Candidate Sites
Unincorporated Area: North Tustin

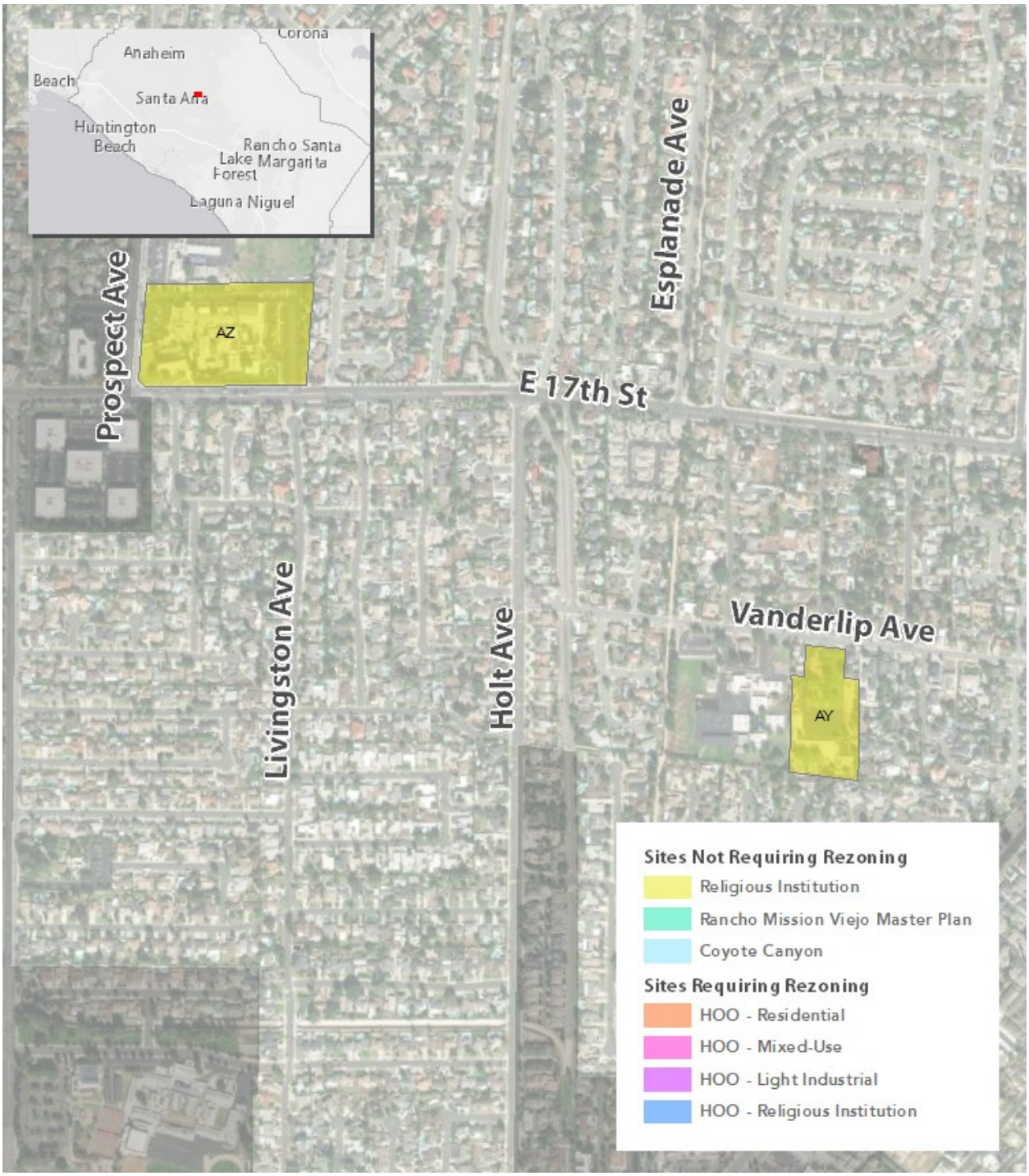
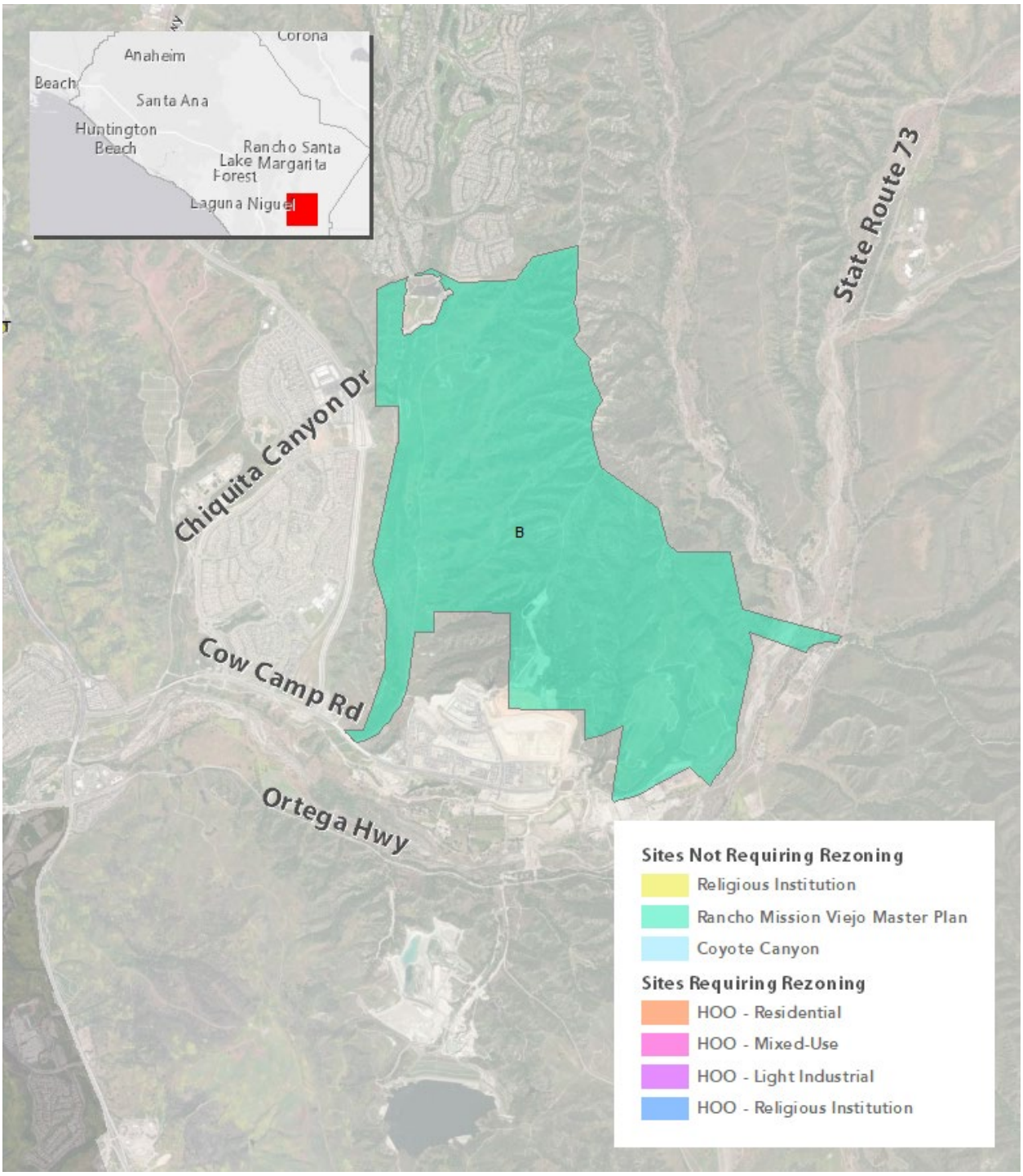


Figure B-14
County of Orange Candidate Sites
Unincorporated Area: Mission Viejo



Site Inventory Methodology

The County has identified parcels throughout the Unincorporated County areas within the County with a realistic capacity to meet their anticipated housing needs during the planning period (2021-2029). This is based on the demonstrated past development trends on sites within the Housing Opportunity Overlay (HOO). The County has a history of building fully affordable projects above the current maximum density as shown in **Table B-14.**

The majority of the identified candidate sites fall within the HOO which is described in more detail previously in this appendix. The identified sites have been evaluated to determine the extent to which on-site uses are likely to redevelop within the planning period. It was found that a number of the existing uses have the potential to redevelop based on redevelopment capacity, underdevelopment of the site, or other existing characteristics. Many of the uses are in multi-tenant commercial centers with one ownership and most show little to no evidence of recent investment or redevelopment.

Program 2 is the zoning action the County took to increase the maximum allowable density permitted within the HOO to 70 dwelling units per acre. The intent of this is to provide more flexibility for the development community to develop a range of affordable products at higher densities. This is a new development density within the Unincorporated County areas, but many cities within Orange County permit this density and build affordable housing. The following examples within Orange County are either primarily or fully affordable housing projects at or near the 70 dwelling units per acre capacity:

- Casa Paloma, Unincorporated Orange County (95 dwelling units/acre)
- Granite Court, Irvine (57.7 dwelling units/acre)
- Belage Manor, Anaheim (57.3 dwelling units/acre)
- Triada at the Station, Santa Ana (55.2 dwelling units/acre)
- Miracle Terrace, Anaheim (41.6 dwelling units/acre)

These projects represent developments that are at or near 100% affordability at the densities considered by the County of Orange and were used in coordination with local developers to determine an appropriate development density for the HOO.

Site Selection and Suitability

The County's RHNA for the 6th cycle Housing Element is accommodated primarily on non-vacant sites. Existing uses on the sites are older, are physically underdeveloped (relative to the potential capacity), or show signs of disinvestment or deferred maintenance, indicating a "ripeness" for private redevelopment. Key sites with existing uses that are "ripe" for redevelopment typically contain older structures and are underutilized given the development potential afforded. Some sites with existing lower-density residential uses provide the

opportunity for significant capacity increases.

The County anticipates increased residential developments in the HOO areas as there is a general lack of developable residential land in the Unincorporated County and a corresponding, critical need for more housing. There has been a marked increase in inquiries and expressed interest by property owners to redevelop non-residential sites into residential uses, a trend seen in the surrounding region.

Underutilized sites included in this inventory have been chosen based on observable and established redevelopment trends of properties and the potential capacity increase available to property owners. State law requires the County to consider lease terms in evaluating the use of non-vacant sites, however the County does not have access to private lease agreements or other contractual agreements amongst parties because they are private documents. Therefore, the County has conducted an analysis to identify sites that show characteristics indicating they are likely to redevelop within the planning period, including past performance, an on-the ground existing use analysis and a market analysis to understand cost of land, construction, and development trends in the Unincorporated County.

To identify sites to be rezoned to meet the RHNA shortfall, the following criteria were looked at are discussed below.

- Vacant/Minimal Improvements
- Existing uses that are typical for redevelopment projects in the County
- Improvement/land value comparison
- Building/site condition
- Location

Existing Use

Existing uses on the identified sites to be rezoned do not pose a constraint to development and are expected to transition during the planning period. This is supported by development demand for the identified sites, expressed interest from developers, and past residential and mixed-use development trends (Table B-9) which has primarily consisted of new multifamily buildings replacing older buildings on infill sites. Most of the uses on the identified sites are similar to those that have been previously recycled in surrounding communities.

Vacant Sites

The Coyote Canyon site and portions of the Rancho Mission Viejo site are both vacant. Of the sites that required rezoning, only two sites are vacant.

Non-vacant sites

Close to 80% of the parcels in the site inventory (exclusive of the church properties) are developed with commercial or commercial type uses (such as auto repair uses) and 20% have residential uses.

- *Commercial uses*: Sites with existing uses are like uses that have been recycled previously in the Unincorporated County and region. **Table B-14** shows that five out of the nine affordable developments since the establishment of the HOO were previously developed with commercial uses. Two key projects are:
    - 9541-9581 W. Ball Rd (Cornerstone) – This fully affordable project is directly adjacent to Ball Road in a primarily commercial district. The previous use was a mixed-use commercial office and retail building.
    - 9051 & 8911 Katella (Stonegate I and Stonegate II) – These fully affordable projects are on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants. These parcels were previously commercial car and RV storage.
- *Commercial/Industrial Uses*: Sites in non-residential areas are predominantly commercial but many are in areas historically developed with industrial uses that have slowly transitioned to commercial uses and more recently to high-density residential uses. The County also has experience permitting development on sites that were previously industrial and manufacturing uses. In the Unincorporated Midway City community, for example, there is a cluster of sites currently developed with auto repair and used car sales in an area with a light industrial feel. Casa Paloma is a fully affordable housing project developed on the site of a previous pottery manufacturing facility. This project, located in Midway City, is surrounded by a mixture of light industrial, commercial, and residential uses. It is a 71-unit affordable housing development with a density of 63.4 du/ac on just over one acre in size. However, there has been a marked transition to residential uses given the high demand for housing. The Jackson Street housing development is a 65-unit affordable development on about a three-quarter acre site with a density of 87.25 du/ac on a site that was previously developed on a site that was in use as an automobile related business and one single family home.
- *Residential Uses*: 29 parcels in the inventory are currently developed with residential units, a trend supported by the projects in **Table B-14** where six of all the 12 projects were previously developed with similar residential uses.

Recognizing that redevelopment of higher -density housing is challenging and unlikely, all identified sites with existing residential uses have less than 5 housing units. Only one parcel has 4 units, one other parcel has two units, and 27 parcels have only one unit. All parcels with a residential use have the potential for significant capacity increases. In fact, the estimated capacity increase on these parcels ranges from 4.5 to 28 times the number of existing units. This is a typical trend for housing developments on properties with existing uses. Potters Lane, a 16-unit affordable development in Midway City was developed on a site previously in use as a single-family home. The project was developed on a site under half an acre in size and achieved a density of 39 du/ac on a site that had a maximum allowed density of 25 du/ac.

- Religious Institution Uses: There are only nine religious institutional sites in the inventory that were chosen based on the availability of excess vacant property or large parking lots, that could accommodate residential development without assuming removal or replacement of church buildings. Throughout California, the development of affordable housing on religious properties has become an increasing trend (due also to the homeless crisis). Nonprofit organizations such as Many Mansions and National CORE have assisted many religious facilities to convert their surplus land and underutilized parking lots into affordable housing. Housing development is also beneficial to the owners. Redevelopment of affordable housing can provide a stream of rental revenue that can replace declining income and lower membership numbers. Religious institution land is ideal for housing development as many in Orange County are in well-established communities that have access to greater economic and educational amenities. Key examples of church housing projects in the County and region are listed below.
    - In 2016, the Brothers of Saint Patrick Novitiate Monastery, located in the Midway City area of the Unincorporated County, rezoned a 3.6-acre portion of a 5.4 acre property to develop a three-story, 88-unit age-restricted (62+) senior housing community known as “The Retreat”. The project has a density of 24.4 du/ac (on a site that allowed a maximum density of 20 du/ac) and was developed prior to legislation facilitating development on religious institutional properties.
    - In Anaheim, two projects on church properties have resulted in the development of 65 new housing units. Wesley Village is an affordable housing development built on the grounds of the Garden Grove United Methodist Church in partnership with, Jamboree Housing Corporation, a non-profit developer. The developer entered a 60-year ground lease with the church, repurposing 2.2 acres of excess parking space and unused

vacant land. The 47-unit development, opened in 2017, includes the addition of a family apartment building, senior apartment building and Head Start learning center. The 18-unit Walden development was built on the St. Mark's Lutheran Church property that was being leased to other congregations. Also in Anaheim, in 2023, St. Michael's Episcopal Church and its partner church, St. James' Church in Newport Beach, worked with Habitat for Humanity to build 24 affordable townhomes.

- In Buena Park, the 66-unit, affordable Orchard View Senior Apartments is under development as partnership between National CORE and St. Joseph's Episcopal Church. The project weas developed on underutilized church land.
- In 2024, the Santa Angelina Senior Community was developed by National CORE at the Episcopal Church of the Blessed Sacrament in Placentia. The development provides 65 affordable apartment homes to seniors aged 62 or better who earn less than 60% of the area median income (AMI). Because of the location, residents of Santa Angelina belong to an engaged, service-enriched village linked to the adjacent church and surrounding community.
- In early 2025, Inglewood First United Methodist in Los Angeles is scheduled to begin construction on 60 studio apartments that will replace three empty church buildings.
- A 25-unit housing development At Trinity Lutheran Church in the City of Whittier was approved in 2021. The church sold part of its property that had a defunct school building.
- IKAR, a Jewish congregation in Los Angeles has plans to break ground in 2025 on a new synagogue that will include a worship space, a preschool and 60 units of affordable housing in the Mid-City neighborhood, where the typical home is valued at $1.8 million.
- The Diocese of Los Angeles, which spans from Santa Barbara County to the San Diego County line has committed to building affordable residential units on 25% of the diocese's 133 church campuses serving low-income families, seniors, refugees, and homeless people. The diocese's churches are working with development partners to build and maintain apartment complexes on land held in trust by the diocese that's being leased to its various partners. The diocese is working with partners in Placentia, Buena Park, Anaheim, Claremont, Downey, Garden Grove, Gardena, Rialto, Riverside and others.

- In 2019, Clairemont Lutheran Church members in San Diego an affordable housing project on part of their parking lot. Clairemont Lutheran Church ultimately envisions a roughly 16-unit affordable rental for San Diego residents transitioning out of supportive housing.

Regional Trends

Regional trends in **Table B-10** look at three north Orange County cities as they are physically close to the identified sites and are areas with similar existing uses, development patterns, and housing markets. Residential development trends in surrounding cities indicate a higher demand for residential uses in areas with limited land availability, often leading to the redevelopment of commercial properties. This shift is evident as commercial areas and properties originally developed for commercial uses are increasingly being converted to meet residential needs. Previous uses for the developments shown in **Table B-10** are like the existing uses on the HOO rezoning sites in the inventory.

Table B-9
Recent Redevelopment Trends in Unincorporated Orange County

Affordability	Residential Developments	Units	Zoning	Size	Prior Use
Affordable	Cornerstone 9541-9581 W Ball Rd 127-284-01	49	CN Commercial Neighborhood	1.45	Commercial (Office/Retail Building)
Affordable	Avenida Villas 9602-9612 W Ball Rd	29	R3	0.82	Medical Office Building
Affordable	Buena Vista 16451 E Buena Vista St	17	C2	0.51	Vacant
Affordable	Stonegate I 9051 Katella	38	C1	1.15	Commercial/Car and RV storage
Affordable	Stonegate II 8911 Katella	26	C1	0.76	Commercial/ RV rentals
Affordable	Cerritos Family, 9501 W Cerritos	60	R2 Multifamily Dwellings	2.05	Church
Affordable	Potter's Lane, 15171 Jackson	16	C2	0.41	Single-Family Residential Unit
Affordable	Casa Paloma 15162 Jackson,	71	C2	1.12	Pottery Manufacturing Facility
Affordable	Jackson Street 15081 Jackson Ave, 15072 Adams, 15082 Adams	65	C2	0.75	Single family and commercial (automotive) use
Market-Rate	14892 Van Buren St Midway City	3	R3	0.18	Vacant
Market-Rate	14621 Adams St, Midway City	4	R3	0.22	Single family unit
Market-Rate	14881 Newland St Midway City	4	R3	0.18	Duplex
Market-Rate	14682 Adams St Midway City	4	R3	0.4	Single family unit
Market-Rate	14672 Adams St Midway City	4	R3	0.4	Single family unit

Table B-10
Recent Redevelopment Trends in the Region

City	Project	Units	Description	Previous Use	Status	Year
Garden Grove	Brookhurst Triangle	800	800 units on 13.9 acres and 200,000 sf of commercial uses (mixed-use) _	Commercial buildings/uses and used auto dealerships	Completed	
Garden Grove	Century Triangle	53	53 townhomes	Commercial buildings/uses and used auto dealerships	Completed	
Garden Grove	Shea Homes	70	70-Unit Small Lot Subdivision	Church/religious facility and school	Completed	
Garden Grove	Wesley Village	47	47 affordable units on 2.5 acres	Garden Grove United Methodist Church and pre-school and the Head Start program	Completed	
Garden Grove	Garden Brook Senior Village	394	394 affordable units on 5.1 acres (mixed-use)	Vacant buildings from a prior car dealership	Completed	
Garden Grove	Walden	18	18-unit single family residential small lot subdivision	Church/religious facility and school	Completed	
Garden Grove	Grove Senior Apartments	85	85 senior apartment units	Restaurant and automotive buildings/use	Completed	
Garden Grove	Harbor Grove Senior Apartments	93	93 senior apartment units	Commercial buildings	Completed	
Garden Grove	Sungrove Senior Apartment Homes	93	93 senior apartment units	Commercial buildings (flower shop, dairy shop, coin-operated car wash)	Completed	
Garden Grove	Bria Townhomes	31	31 townhomes	Intermediate care facility for developmentally disabled	Completed	
Garden Grove	9691 Bixby Avenue	27	27 units (2 affordable) with some tandem parking	Daycare facility	Undergoing Review	2023
Garden Grove	13252 Brookhurst Street	24	24 townhomes or 35 townhomes	Restaurant building and/or rental car lot	Undergoing Review	2023
Garden Grove	8322 Garden Grove Blvd	19	19 attached units (2 affordable)	Commercial buildings	Undergoing Review	2023
Garden Grove	13002 Nina Pl	15	15-unit apartment building (2 affordable)	Commercial buildings and single-family residence	Undergoing Review	2023
Garden Grove	9891 Garden Grove Blvd	59	59-unit apartment building	Auto repair building/use	Undergoing Review	2023
Garden Grove	9961 Garden Grove Blvd	55	55-unit affordable apartment building	Used auto dealership buildings/use	Undergoing Review	2023
Garden Grove	8642 Garden Grove Boulevard	23	23-unit mixed-use project	Commercial and office buildings	Undergoing Review	2023
Garden Grove	10231 Garden Grove Blvd	52	52-unit mixed-use project	Commercial building (furniture store) and used auto dealership	Undergoing Review	2023
Garden Grove	Pearl Street Work-Live10662 Pearl St	#	10-unit work-live mixed-use project	Commercial buildings (bicycle shop) and a single-family home	Undergoing Review	2023 2023
Garden Grove	Smallwood Plaza	9	9-unit mixed-use project	Commercial buildings	Undergoing Review	2023
Garden Grove	12891 Main St					2023
Garden Grove	8734 Garden Grove Blvd	20	19 attached units (affordable)	Used car auto dealership	Undergoing Review	2023

Table B-10
Recent Redevelopment Trends in the Region

City	Project	Units	Description	Previous Use	Status	Year
Westminster	Della Rosa	50	a 50-unit affordable housing development	Older commercial strip mall	Completed	
Westminster	Westminster Crossing	65	65-unit affordable housing project	Underutilized commercial building	Completed	
Buena Park	Clark Commons 8004 Orangethorpe Avenue	70	70 affordable deed restricted multifamily units	Strip Retail Center	Completed	2017
Buena Park	Orchard View Senior Apartments 8300 Valley View Street	66	66-unit affordable age restricted multifamily residential (proposed/under review)	Religious facility, parking lot	Undergoing Review	
Buena Park	Indigo Walk 8281 Page Street	54	54-unit multifamily residential	Religious facility, parking lot	Under construction	
Anaheim	1619-1699 W Lincoln Ave	115	115 townhomes	Manufacturing business and 2 auto dealerships	Completed	2023
Anaheim	Zia 1600 W Lincoln Ave	315	315-unit mixed-use multifamily complex	Auto dealership and repair	Completed	2024
Anaheim	100-394 W Cerritos Ave	292	292-unit multifamily complex	office, light industrial business	Completed	2023
Anaheim	Downtown Anaheim 39 702-798 N Ethan Way	39	39-unit multifamily complex	RV storage	Completed	2022
Anaheim	312-400 S Euclid	39	39-unit townhome complex	small office, small strip mall, restaurant	Completed	2022

Source: Cities of Anaheim, Garden Grove, Beuna Park, and Westminster 2021-2029 Housing Elements

Size and Lot Consolidation

Due to the historical parcelization pattern in the older areas of the Unincorporated County, the inclusion of small sites in the inventory is expected. Nonetheless, to adhere to State law and HCD guidance, there are no stand-alone small sites used to meet the lower-income RHNA. Small parcels are included in the inventory but only as part of a larger, multi-parcel sites. Exclusive of the Rancho Mission Viejo Master Plan area, Coyote Canyon, and religious institution sites, the average site size (which may contain multiple parcels) is 1.7 acres with a median size just under one acre (0.8 acres). In general, small site development is still a realistic approach as the County of Orange has previous recent experience developing affordable housing on sites smaller than half an acre (Potter's Lane). All but one of the nine affordable multifamily developments in **Table B-14** were developed on sites larger that the inventory average (1.7) and five of those projects on sites that are 0.8 acres or smaller.

Due to the historical parcelization pattern in many areas of the Unincorporated County, the inclusion of small sites in the inventory is expected and is reasonable to anticipate that the collection of parcels will redevelop as one new development to maximize efficiency and design of the new use. The County includes lot consolidation as part of the development review process. Lot consolidation is done as part of the mapping process and approved with initial entitlements. This does not place additional requirements outside of the County's typical development process

on an applicant and is approved concurrently. **Table B-14** shows that four large affordable projects included lot consolidation. These projects have a combined capacity of 149 units. These 4 projects have an average size of less than one acre. This size and lot consolidation pattern matches the site inventory. While multi-parcel sites under common ownership are ideal, it is unrealistic. Nonetheless, more than half (55%) of the multi-parcel sites are either fully under common ownership (one owner) or have several parcels under common ownership, which can make sales and/or lot consolidation easier.

The County's Zoning Code currently incentivizes lot consolidation within the Housing Opportunities Overlay by granting graduated density increases to projects that consolidate based on project size after lot consolidation (section 7-9-44.7 of the Zoning Code). The County's Code reads "A graduated density incentive shall be granted when parcels smaller than one-half (0.5) acre are consolidated as part of a project. The increased density shall be in addition to any other density bonus available under this Zoning Code, to a maximum of 45% total, and shall be calculated as follows." (Shown in **Table B-11** below.) The graduated density incentives in the zoning code are aimed at facilitating and encouraging lot consolidation to ensure that these smaller sites can appropriately provide additional residential units.

Table B-11
Graduated Density Increase within HOO

Project Size (after lot consolidation)	Base Density (per net development area)*
Less than 0.50 acre	70 units/acre
0.50 to 0.99 acre	77 units/acre (10% increase)
1.00 acre or more	84 units/acre (20% increase)
**Note: Base densities will be updated based on the increased density permitted within the HOO per Housing Element Program 2*	

Site Conditions

Site conditions were an additional criterion for site selection. Underutilized sites consist of existing uses that are older or show signs of disinvestment or deferred maintenance, indicating a "ripeness" for private redevelopment. Many parcels in the inventory are currently developed with commercial uses and have a high potential for conversion to residential or mixed-use based on existing site characteristics such as deteriorated or vacant structures, low building value compared to land value, or marginal economic uses (e.g., used car sales).

Comparing assessed improvement value with assessed land value provides insights into the composition of a property's value, revealing the relative contributions of buildings and land. It indicates investment levels, development status, and potential for future improvements. For planners and policymakers, it informs zoning decisions and highlights areas for potential redevelopment or infrastructure enhancement. In this site inventory an improvement/land comparison shows that most sites have land values that are higher than improvement values

which signifies ripeness for development. The average improvement to land value ratio for non-church HOO sites is 0.6 which suggests that the existing buildings or improvements on the identified HOO sites (exclusive of religious institutions) may be underutilized or outdated or that the current use is not maximizing the land's potential. Such properties are often prime candidates for redevelopment, as investors and developers see opportunities to replace or significantly upgrade the current structures to better align with the land's high value and potential for higher returns. Of the parcels where improvements and land value data were available, only 11 parcels (out of the 146) had a ratio over 1.54 and in almost all cases those parcels were not stand alone uses but in site grouping where the majority of the site had a ratio under 1.54.

Identifying potential sites must balance available information on the site with a visual and contextual assessment. While data pointing at older structures or high improvement value can give a good sense of the redevelopment potential, for many sites visual cues are important. There are a few sites where the data indicates a higher improvement value or a newer structure, but a visual assessment shows that a structure shows signs of disrepair or is underdeveloped in comparison with development nearby. The site with the largest ratio value was visually assessed as a single-family home on a larger lot in extreme disrepair. The site shows clear signs of neglect and lack of maintenance, with visible exterior deterioration such as peeling paint and damaged fixtures. The unused pool and presence of trash in the yard further indicate a state of disuse and disregard for upkeep. Its location in a neighborhood that is transitioning to multifamily uses, along with an allowed density that would allow a 12-fold increase in units, made it an ideal candidate for redevelopment.

Location

In addition to an on-the-ground existing use analysis, the County of Orange has market conditions to facilitate the redevelopment of non-vacant sites for residential. A California Association of Realtors report for Historic Housing trends shows that the average time a unit spends on the market in Orange County is just 18.6 days in the last four years (2017-2021) and just 13.3 days in the last two years.[23] Additionally, according to the CAR Current Sales and Price Statistical Survey, the median cost of a home for sale in Orange County increased by 20% from

[23] Median time on Market of Existing Detached Homes, Historical Data, California Association of Realtors (CAR), Accessed online: December 9, 2021. https://www.car.org/marketdata/data

2020-2021 (from $930,000 in October 2020 to $1,120,000 in October 2021).[24] The indicators above signify an increased market demand for new housing**.**

All sites requiring rezoning are urban, infill sites and do not have any environmental or infrastructure constraints. Each site has been evaluated to ensure there is adequate access to water and sewer connections as well as dry utilities. Each site is situated with a direct connection to a public street that has the appropriate water and sewer mains, dry utilities services, and other infrastructure to service the candidate sites. No sites have easements that would reduce development potential (e.g., roadway or major utility easements).

Housing Opportunity Overlay

It is important to recognize that this inventory of potential development sites is much smaller than the entire Housing Opportunities Overlay Zone because it only includes high potential sites based on the criteria listed above and in the following description of specific communities. Based on the allowable density of 70 to 84 units per acre excluding any density bonus, the total capacity of the Housing Opportunities Overlay Zone is more than 5,000 additional lower-income units. This is a conservative estimate since any residential project within the Housing Opportunities Overlay Zone will also qualify for a density bonus. **Table B-14** lists residential development projects that have been constructed on parcels within the HOO. The County has been successful in redeveloping non-vacant sites zoned for other than residential uses for development of housing.

The County has received letters of support from local affordable housing developers indicating their experience in developing in the HOO. These letters are shown in Appendix C (**Figures C-1 to C-2)** and are from developers who have previously built over 100 affordable units within the HOO. They demonstrate support for the HOO as well as prove, along with the projects, below, the effectiveness of the HOO in affordable housing being developed within the County of Orange.

High Quality Transit Areas

The Southern California Association of Governments (SCAG) developed a mapping tool for High Quality Transit Areas (HQTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. A Significant portion of the Unincorporated County, particularly in the north, is within a HQTA and provides Significant incentives for development of affordable housing:

[24] Current Sales and Price Statistics, California Association of Realtors (CAR), Accessed online: December 9, 2021. https://www.car.org/marketdata/data

- Provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop.
- Assembly Bill 2097 (AB 2097) prohibits cities and counties from enforcing minimum parking requirements for residential, commercial, and other types of developments located within half a mile of public transit. Developers can decide how much parking to provide based on market demand rather than being bound by local government mandates. This flexibility can lead to more innovative and cost-effective project designs.

Of sites that required rezoning, more than half (51%) of the lower-income site capacity is located on sites within a HQTA. Close to half (48%) of all site capacity is on sites within a HQTA. Recent projects in the Unincorporated County have benefited from HQTA incentives.

The eight affordable housing projects built since 2006 are located on or adjacent to transportation corridors. For example. Stonegate I and Stonegate II are fully affordable projects located on Katella Avenue, a major commercial corridor adjacent to auto-related neighborhood commercial uses and directly across the street from a shopping center with several large anchor stores and smaller tenant uses, including local restaurants. Casa Paloma, a 71-unit multifamily affordable housing apartment community, was developed in accordance with the Housing Opportunities Overlay Zone Regulations and qualified for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop. The project's proximity to a major transit stop also permits use of modified parking standards.

Incentives for Redevelopment:

The County's successful track record of facilitating the development of affordable projects since the adoption of the Housing Opportunities Overlay Zone in 2006, combined with the ongoing efforts of Planning and Housing staff, will create the regulatory framework to encourage housing development to the extent as economic conditions improve allow.

As discussed previously, the County's Zoning Code currently incentivizes lot consolidation within the Housing Opportunities Overlay by granting graduated density increases to projects that consolidate based on project size after lot consolidation (section 7-9-44.7 of the zoning code). Sites that are one or more acres in size have a maximum density of 84 du/ac compared to the base density of 70 du/ac for sites less than half an acre in size.

Due to the County's extensive experience with affordable housing development, they are skilled at collaborating with developers to maximize land use and leverage regulatory incentives to facilitate affordable housing development, as shown in **Table B-12.**

Table B-12
Incentives Granted to Affordable Housing Developments within the HOO

Project Address/ APN	Dwelling Units	Size	Incentives Granted
Cornerstone 9541-9581 W Ball Rd 127-284-01	49	1.45 acres	• Over-height walls and lighting standards • Decreased front setback
Avenida Villas 9602-9612 W Ball Rd 127-341-52	29	0.82 acre	• Over-height walls and lighting standards • Decreased front setback • Use of commercial parking standards
Buena Vista 16451 E Buena Vista St 360-383-02, 360-383-03	17	0.51 acre	• Over-height walls • Decrease in minimum drive aisle width
Stonegate I 9051 Katella 127-621-06, 127-621-07	38	1.15 acre	• Reduced length of parking spaces • Additional ten feet in height of building • Over-height walls and lighting standards
Stonegate II 8911 Katella 126-503-29	26	0.76 acre	• Reduced length of parking spaces • Additional ten feet in height of building • Over-height walls and lighting standards
Cerritos Family 9501 W Cerritos 127-401-39	60	2.047 acres	• Reduced depth of parking stalls and drive aisle • Reduced front setback • Over-height walls and lighting standards
Potter's Lane 15171 Jackson 107-151-16	16	0.41 acre	• Reduced length of parking stalls
Casa Paloma 15162 Jackson, 15182 Jackson 107-180-11, 107-180-23	71	1.12 acre	• Increase of maximum building height • Unlimited density bonus

Realistic Capacity Approach

Consistent with HCD guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. Due to the limited availability of residential land, many property owners and developers may opt for a density bonus to increase the unit count. Starting in 2021, residential projects in California with on-site affordable housing can get a density bonus of up to 50 percent. Previously, under Government Code Section 65915—commonly known as the Density Bonus Law—the maximum bonus was 35 percent. In addition, provisions within Government Code Section 65915 (AB 1763) allow for "unlimited" density for 100% affordable developments (within prescribed income categories) that are located within one-half mile of a major transit stop.

Housing Opportunities Overlay (HOO)

The 6th Cycle RHNA sites inventory includes 59 sites within the HOO. The HOO is a zoning overlay district that provides for the development of 100% affordable rental housing by-right (without a use permit) within commercial, mixed-use, and industrial districts, and on building sites zoned for high density residential uses. Affordable housing projects are authorized within this overlay district regardless of the underlying zoning. Most sites within the site inventory have

a residential (R-2, R-3, and R-4) or mixed-use (MX) underlying zone. Maximum allowable density (ranging from 77 to 84 du/ac) for the HOO is used to calculate realistic capacity of the sites based on the County's strong record in development of affordable housing in the HOO, new zoning regulations that prioritize housing development in non-residential areas, and incentives to achieve higher densities through lot consolidation.

All HOO sites have underlying zoning that has been amended to require a minimum residential density of 30 du/ac and a maximum of 43.5 du/ac. The HOO densities range from 70 du/ac to 84 du/ac depending on site size. This graduated density approach incentivizes affordable residential development for larger projects or projects that consolidate multiple properties. For multi-parcel sites in the inventory, the HOO density applied in the inventory is not based on overall combined site size but rather on the individual parcel size. For example, a site can have three parcels in a range of sizes with three different maximum densities. This is a more conservative approach for calculating capacity and in most cases means that the actual true capacity potential (for the overall site) is not used.

Table B-13
HOO Site Densities

Site Zoning	Allowed Density Range	Realistic Capacity Assumed Density
HOO-R-2	30 – 84 du/ac (depending on size)	• Less than 0.50 acre: 70 units per acre • 0.50 to 0.99 acre: 77 units per acre (10% increase) • 1 acre or more: 84 units per acre (20% increase)
HOO-R-3	30 – 84 du/ac (depending on size)	
HOO-R-4	30 – 84 du/ac (depending on size)	
HOO-MX	30 – 84 du/ac (depending on size)	
HOO-M-1	30 – 84 du/ac (depending on size)	

The site inventory assumes that potential development will occur under the HOO, rather than the base zone, due to the generous development standards and strong development track record. As mentioned above, maximum allowable densities (ranging from 77 to 84 du/ac) for the HOO are used to calculate realistic capacity of the sites. The HOO was adopted in 2006, and the maximum density has been increased twice since then and actual development densities have increased proportionally. **Table B-14** shows that all but two projects have achieved densities in excess of what is allowed in the HOO. In comparison, recent residential development in residential (R-3) areas outside the HOO during the same period have been developed at lower densities (**Table B-15**).

California's Density Bonus Law allows developers to increase the density of a property beyond the maximum allowed by a jurisdiction's General Plan. Projects where 100% of units have below market rate rents and located near transit (High Quality Transit Areas or HQTA) may be eligible for unlimited density and reduced or no parking standards. Close to 65% of all HOO sites are located within a HQTA and the potential for unlimited density shows that projects have the

potential for greatly exceeding the maximum density in the HOO. Projects outside of a HQTA overall show slightly lower densities (as a proportion of allowed maximum density) yet still average densities in excess of the maximum allowed densities on the properties. As such, assuming maximum density on identified HOO sites is a reasonable and realistic approach.

State law also requires that for non-residential zoned sites, the capacity methodology accounts for the likelihood of residential development on these sites. Stand-alone, non-residential projects are not allowed in the HOO on the underlying zones for the identified sites. The HOO regulations require that all projects, including mixed-use projects, include housing. And based on development trends in the HOO where no mixed-use projects have been built, the development of housing is a certainty. Suitability of non-vacant sites is discussed earlier in this methodology section.

Table B-14
HOO Projects List

Project Address/ APN	Units	Size	Density (du/ac)	Zoning	Prior Use	Year Approved	Max HOO Density (at approval)	% of Max Density	HQTA	Lot Consolidation
Cornerstone 9541-9581 W Ball Rd 127-284-01	49	1.45	33.79	CN Commercial Neighborhood	Office/Retail Building	2007	25	135%	No	N/A
Avenida Villas 9602-9612 W Ball Rd	29	0.82	35.37	R3	Medical Office Building	2011	43	82%	No	2 parcels
Buena Vista 16451 E Buena Vista St	17	0.51	33.33	C2	Vacant	2011	25	133%	No	2 parcels
Stonegate I 9051 Katella	38	1.15	33.04	C1	Commercial/Car and RV storage	2009	25	132%	Yes	2 parcels
Stonegate II 8911 Katella	26	0.76	34.21	C1	Commercial/ RV rentals	2009	25	137%	Yes	N/A
Cerritos Family 9501 W Cerritos	60	2.047	29.31	R2 Multifamily Dwellings	Church	2012	43	68%	No	Unknown
Potter's Lane 15171 Jackson	16	0.41	39.02	C2	Single-Family Residential Unit	2017	25	156%	Yes	No
Casa Paloma 15162 Jackson,	71	1.12	63.39	C2	Pottery Manufacturing Facility	2022	25	254%	Yes	No
Jackson Street 15081 Jackson Ave, 15072 Adams, 15082 Adams	65	0.745	87.25	C2	Single family and automotive use	2022	70	125%	Yes	3 parcels

Table B-15
Recent Non-HOO Residential (R-3) Project List

Parcel Address	Reporting Year	Units	Acres	Density (du/ac)	Zoning	Max Density Allowed	HOO	HQTA	% of Max Density	Prior Use	Lot Consolidation
14892 Van Buren St Midway City	2021	3	0.18	16.69	R3	43.50	No	Yes	38%	Vacant	No
14621 Adams St, Midway City	2020	4	0.22	18.18	R3	43.50	No	Yes	42%	SFD	No
14881 Newland St Midway City	2020	4	0.18	22.26	R3	43.50	No	Yes	51%	Duplex	No
14682 Adams St Midway City	2020	4	0.4	10.81	R3	43.50	No	Yes	25%	SFR	No
14672 Adams St Midway City	2020	4	0.4	10.81	R3	43.50	No	Yes	25%	SFR	No

Religious Institutions

The site inventory includes several religious institutions sites with excess vacant property or large parking lots which could accommodate residential development. Removal or replacement of church buildings is not assumed. SB 4, effective 2024 stipulates that faith-based organization or nonprofit college maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel. Realistic capacity on the three religious institution sites within the HOO assume maximum density (see section above).

Other: RMV/Coyote Canyon

Realistic capacity on the County-approved Coyote Canyon site is assumed to be about 6 du/ac. This low-density assumption is based on densities for similar projects and in consideration of site characteristics.

Rancho Mission Viejo is a Planned Community in south Orange County originally approved for 14,000 units in 2004. Planning Area 3 of the community is expected to be submitted for approval and is anticipated to accommodate approximately 4,166 units within the 2021-2029 6th Cycle Housing Element Period. When developing the 2021-2029 RHNA Allocation Plan, SCAG utilized Orange County Projections (OCP) 2018 which each local jurisdiction, including the County, participated in its development and provided population, employment, and housing growth data for the current planning period. The forecast data submitted by the County included information provided by Rancho Mission Viejo. Rancho Mission Viejo forecasted that they would construct 4,166 dwelling units by the end of the 2021-2029 Housing Element planning period. These dwelling units were included in the County's forecast of new construction and are reflected in OCP 2018, the dataset used by SCAG to determine the County's RHNA allocation. Full buildout of the 14,000 units in the Rancho Mission Viejo planned community is expected in approximately 25-30 years. Only the 4,166 units included in the SCAG OCP are included in this site inventory.

Densities Appropriate for Accommodating Lower-Income Housing

Affordability is dependent on density allowed, capacity, and size. The capacity of sites that allow development densities of at least 30 units per acre are credited toward the lower-income RHNA, as allowed by State law. The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by State law (at least

30 units per acre for Orange County), HCD is obligated to accept sites with those density standards (30 units per acre or higher) as appropriate for accommodating the jurisdiction's share of regional housing need for lower-income households. Land use designations with density ranges near the default density are considered appropriate to accommodate housing for moderate-income households.

- HOO: All HOO sites (which require inclusion of affordable housing) are included under the sites requiring rezoning and as such must meet the State-designated default density standard (at least 30 du/ac) and meet the shortfall requirement of accommodation at least 16 units to be credited toward the lower-income RHNA. HOO sites under 0.5 acres in size or those sites with a capacity less than the 16 units (shortfall requirement) are credited toward the moderate- and above-moderate-income RHNA shortfall.
- Religious Institutions: The site inventory includes several religious institutions sites with excess vacant property or large parking lots, which could accommodate residential development. SB 4, effective 2024 stipulates that faith-based organization or nonprofit college maintain the affordability of these homes to households below 80 percent of the area median income for at least 55 years for rental housing and 45 years for homeownership opportunities. If a project is in an area zoned for residential use, it must be allowed a density deemed appropriate for lower-income households per housing element law (30 du/ac in Orange County). If located in a commercially zoned area, the project may be up to 40 units per acre, and a height of one story above the maximum height applicable to that parcel.

Large and Small Sites

Consistent with updated Housing Element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower-income sites inventory presented in this section is predominately limited to parcels between 0.5 and 10 acres in size, as state law has indicated these size parameters can best accommodate lower-income housing development. The only large sites included have commitments to the development of affordable housing. Sites meeting the default density standard (at least 30 du/ac) but are under 0.5 acres in size are credited toward the moderate-income category as are sites that meet the default density standard and are larger than 0.5 acres but cannot accommodate 16 units as required by the shortfall requirements.

- Small Sites: Due to the historical parcelization pattern in the older areas of the Unincorporated County, the inclusion of small sites in the inventory is expected. Nonetheless, to adhere to State law and HCD guidance, there are no stand-alone small sites used to meet the lower-income RHNA. Small parcels are included in the inventory but only as part of a larger, multi-parcel sites. Those sites must meet the

30du/ac default density and the 16-unit capacity requirements for shortfall (rezoning) sites to be credited toward the lower-income RHNA. Small sites (less than 0.5 acres or those sites with a capacity less than the 16 units required by law) are credited toward the moderate- and above-moderate-income RHNA shortfall. In general, small site development is still a realistic approach as the County of Orange has previous recent experience developing affordable housing on sites smaller than half an acre. **Table B-16** shows specific examples of affordable housing developments the County has completed on parcels that are half an acre or less in size.

Table B-16
Affordable Development – Small Site Examples

Project	Location	Parcel Size (ac)	Density (du/ac)	Total Units (by affordability level)
Buena Vista PA 100017	16451 Buena Vista St., Orange	0.5	34	17 Units (6 extremely-low-, 8 very low-, 3 low-)
Potter's Lane PA 150058	15171 Jackson Street, Midway City	0.41	39	16 Units (15 very low 1 above-mod Manager's Unit)
*Note: The County of Orange does not track historic lot consolidations. Many of the HOO fully affordable projects shown in **Table B-3** are the product of a consolidation of small lots as discussed below.*				

- Large Sites: two large sites are included in the inventory and the capacity credited to the lower-income RHNA is limited to units that the property owners have committed to providing.
    - Rancho Mission Viejo Planning Area 3 spans 385 acres and the owners have forecasted that they would construct 4,166 dwelling units by the end of the 2021-2019 Housing Element planning period. As part of a 2016 a General Plan amendment and development agreement, the property owner is required to comply with the Affordable Housing Implementation Agreement (AHIA), which requires inclusion of 165 lower-income units in Planning Area 3Coyote Canyon is a 375-acre former landfill property that is owned by the County of Orange. Only the units that the County has committed to set aside for deed-restricted, affordable housing are assumed to be affordable to lower-income households (see Program 3). The County has developed a large site similarly in Rancho Mission Viejo within the last planning period, Specifically, Sendero Bluffs and Esencia Norte in Rancho Mission Viejo include a total of 219 lower-income units as well as moderate- and above-moderate-income units. A similar approach is proposed for the Coyote Canyon sites. The County thus has a proven track record of developing lower-income housing on large sites along with other types of housing.

While not falling under the large site size parameters set by State law, the inventory includes three stand-alone sites that are between 4.5 and 7.8 acres in size. Due to the densities on these sites (>30 du/ac) capacity can be credited toward the lower-income RHNA. However, as a more conservative approach, the capacity is split evenly between the lower- and moderate-income category. This approach provides flexibility for the potential development of mixed-income housing.

APPENDIX C: PUBLIC PARTICIPATION SUMMARY

Public participation is an important component of the planning process. Section 65583 of the Government Code states that, "the local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort." Meaningful community participation is also required in connection with the Assessment of Fair Housing (AFH). As part of the 6th Cycle Housing Element Update process, the County of Orange has provided residents and other interested parties numerous opportunities for review and comment. These engagement efforts included community workshops and meetings, meetings with Housing Element Resource Team, online and digital outreach, and public hearings. This proactive outreach effort invited broad involvement throughout the analytical and policy development phases of the project.

The following is a list of meetings and hearings held during the Housing Element update process.

February 16, 2021	Community Workshop #1
February 17, 2021	Resource Team #1
September 27, 2021	Community Workshop #2
September 28, 2021	Resource Team #2
October 27, 2021	Planning Commission Study Session
March 14, 2023	Rossmoor Community Services District Meeting
Month, 2023	Planning Commission hearing
Month, 2023	Board of Supervisors hearing

Notices of all Housing Element public hearings were published in the local newspaper in advance of each meeting, as well as posting the notices on the County's website:

https://ocds.ocpublicworks.com/. The draft Housing Element was made available for review at County offices and posted on the website.

For the 2021-2029 Housing Element Update, OC Development Services conducted the following:

- Sent invitations to all of the advisory and non-advisory committees within the County of Orange (North Tustin Planning Advisory Committee, Coto de Caza Planning Advisory Committee, Orange Park Acres, Foothill Trabuco Specific Plan Review Board, Rossmoor Homeowners Association, etc.) for the Community Workshops.
- Requested that Kennedy Commission, Abrazar and La Colonia Independencia community centers send an email notice about the Community Workshops to those on their mailing list.

A community survey was also circulated to various agencies and groups and translated in Spanish and Vietnamese. Oral translation services were also available upon request. Links to the community survey were posted on the County's social media outlets. The survey generated 249 responses, and the results were as follows:

- The community was able to select 3 areas where they envisioned growth. 74 responses went to Ladera Ranch, 69 responses went to Rancho Mission Viejo, 62 responses to Foothill/Trabuco, 61 responses to Midway City, 59 responses to Silverado-Modjeska, and 56 responses towards North Tustin.
- The community was then asked to select 3 areas for where they want to see more housing. 165 responses went to areas in older shopping centers, and 140 responses supported areas near transit.
- When asked what type of housing was most needed, 109 responses were for single-family detached homes, 98 for senior housing, and 81 for multifamily housing.
- The community was asked to select 3 housing-related concerns. 103 responses were related to low inventory of available housing, 95 responses were for lack of available sites, and 91 responses were for lack of affordable housing.
- There were 80 write-in comments, which included a need for more affordable housing, density (for and against), maintaining existing neighborhoods, opposing ADUs in single family neighborhoods, opposing development in high fire areas (i.e., canyons), higher density near transit, along with some concerns related to homelessness, and traffic.

Each draft of the Housing Element Update was made available for public review and comment on the County's website. Notification of availability was emailed to the Housing Element email distribution list. Comments were reviewed and addressed prior to submittal to State HCD.

Table C-1 provides a summary of public comments and how those comments have been addressed in this Housing Element.

Figures C-1 to C-2 provides the letters of support received for the County of Orange 2021-2029 Housing Element.

Table C-1
Summary of Public Comments

Comment	Response
What is the County doing to reach out to the community?	County staff, in collaboration with the consultant, hosted community workshops to discuss the Housing Element Update in February and September 2021. In particular, invitations were circulated to advisory and non-advisory committees (North Tustin Planning Advisory Committee, Coto de Caza Planning Advisory Committee, Orange Park Acres, Foothill Trabuco Specific Plan Review Board, Rossmoor Homeowners Association, etc.); advocacy groups; community centers; and posted on the County's Social Media Outlets. The Housing Element Community Survey and Flyers were translated to Spanish and Vietnamese. Oral translation services were also available upon request.
The County needs more affordable housing.	The County recognizes the need for affordable housing, housing for homeless and special needs, and housing for all income levels. OC Public Works has been collaborating with our housing partners at OC Community Resources on various affordable housing developments within Unincorporated Orange County. In particular, the County's Housing Opportunities Overlay has led to the development of eight (8) affordable housing projects since 2006.
What sort of strategies are being incorporated into the County's Housing Element?	To encourage and facilitate the development of Accessory Dwelling Units (ADUs), County staff posted an ADU Flyer on our website, and released a Request for Proposal (RFP) to select a consultant to prepare pre-approved ADU plans. In 2018, the County issued permits for 23 ADUs, followed by 21 ADUs in 2019, 51 ADUs in 2020, 57 ADUs in 2021, and 64 ADUs in 2022. Since 2018, the County has seen a 178% increase in the number of issued permits for ADUs. This trend reflects a continued increase in ADU activity. As for other innovative strategies, the County provided financing and entitlements for Potter's Lane, a 16-unit shipping container development in Midway City. In order to address the number of very low- and low-income RHNA units, the Board of Supervisors adopted an amendment to the Housing Opportunities Overlay Zone regulations to increase density from 43 to 70 units per acre for sites located within the County's Housing Opportunities Overlay, excluding any applicable density bonus.
How were the Housing Element sites selected?	In general, the land inventory is a listing of candidate sites for development. A developer would have to submit a proposed application for the site to make the development come to fruition, and market conditions would dictate the type of housing to be built and population to be served. Characteristics that have been taken into consideration when evaluating the appropriateness of sites include physical features (e.g., size and shape of the site) and location (e.g., proximity and access to infrastructure, transit, job centers, etc.). As an example, the candidate sites within the Housing Opportunities Overlay are also near public transit and other amenities, particularly within Unincorporated Anaheim, Unincorporated Stanton, and Midway City. In particular, since the County's Housing Opportunities Overlay successfully led to the development of multiple affordable housing developments, County staff is anticipating approximately 4,384 units within the Overlay for this upcoming 6th Cycle Housing Element. Also, Rancho Mission Viejo encompasses a large portion of Unincorporated Orange County, so the land inventory reflects 4,166 total units within Rancho Mission Viejo for this upcoming 6th Cycle Housing Element. The County's area is decreasing as a result of annexations, thus smaller sites that may be merged and consolidated have also been incorporated into the land inventory. As an example, Potter's Lane was located on a site less than 1 acre.

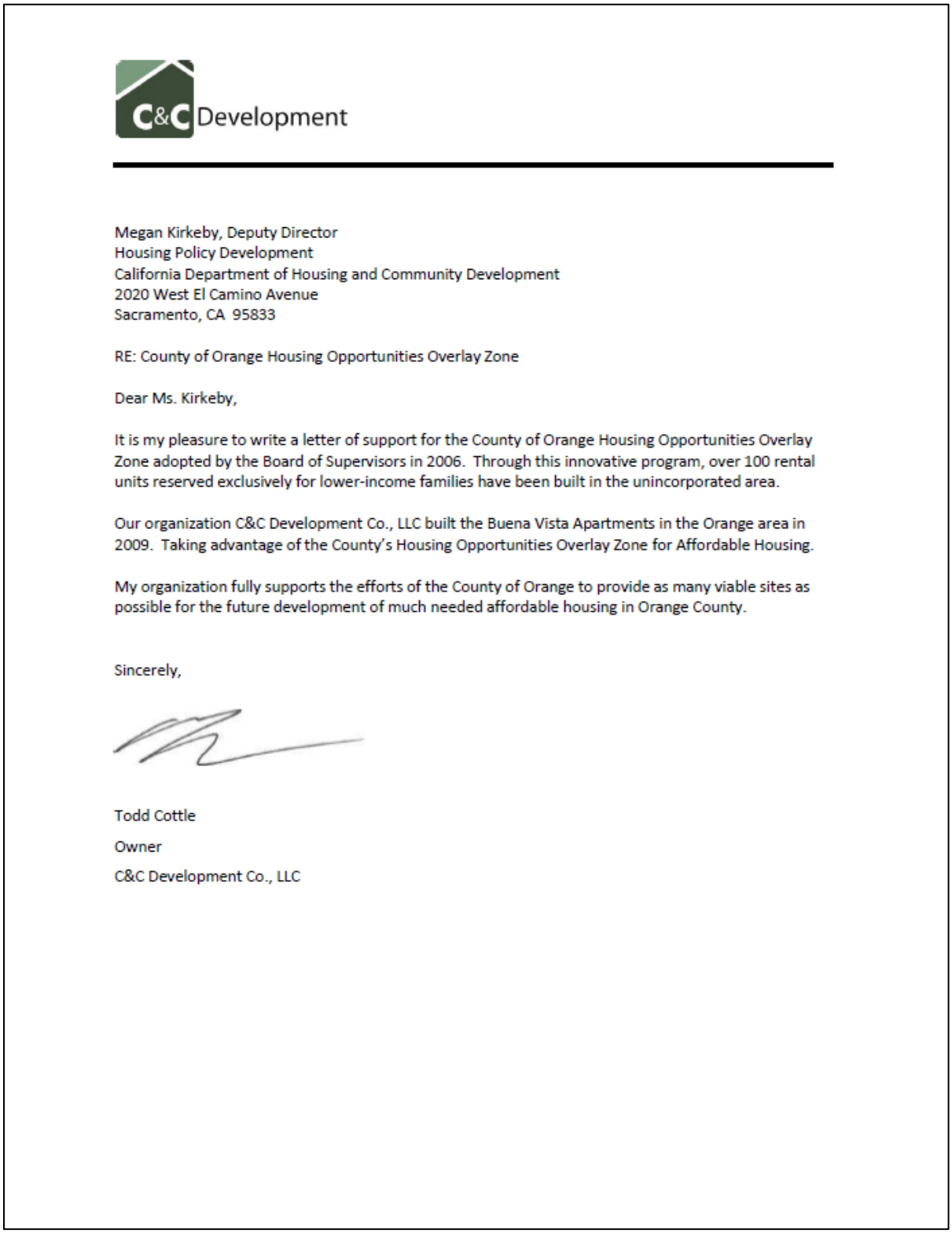
Table C-1
Summary of Public Comments

Comment	Response
Do short-term rentals have an impact on the County's Housing Element?	The County adopted short-term regulations within the Comprehensive Zoning Code Update, which was adopted in July 2020, as a result of the proliferation of short-term rentals in Unincorporated Orange County. From July 2020 through June 30, 2023, 76 short-term rental permits have been approved, Based on the number of STRs that we are aware of, there would be a minimal impact in the housing inventory.
Was consideration given to the walkability of jobs and services in the non-residential areas of Rossmoor from nearby residential areas? This is the only remaining commercial area surrounded by residential uses in Rossmoor.	In general, the candidate sites are identified in the inventory as they have potential for residential development; however, the market conditions would dictate whether development comes to fruition. Developments within the County's Housing Opportunities Overlay could either be residential or commercial. The surrounding uses around the Rossmoor commercial center were considered, and the sites were selected due to factors such as lot size. Walkability was considered when selecting candidate sites, and the County has taken into consideration surrounding uses and their proximity to transit and amenities.
The community requested that a Silverado-Modjeska site be removed due to potential concerns related to flood, fire, lack of access to amenities, septic regulations, etc.	After careful consideration of the public comments, the proposed Silverado site (Assessor Parcel Number 876-034-04) has been removed from the Draft Housing Element; however, based on upcoming feedback from State HCD, County staff may be required to reassess all sites, including those that have been removed.
Candidate sites located within the County's Draft Housing Element have also been identified in other jurisdiction's Draft Housing Elements.	In general, jurisdictions usually identify sites that are within their jurisdictional boundaries; however, Housing Element Law does allow jurisdictions to identify sites within their sphere of influence.
Some of the candidate sites within the County's Draft Housing Element are located in close proximity to John Wayne Airport (JWA), thus within JWA Safety Zones, Noise Contours and Part 77 Obstruction Surface Areas, and Notification Areas.	The Housing Element itself serves as a planning document, which provides candidate sites that are appropriately zoned to meet the County's RHNA at all income levels. Environmental concerns, such as safety are addressed in the Draft Housing Element. The Airport Land Use Commission (ALUC) found the County's Draft Housing Element Update consistent with the existing Airport Environs Land Use Plan (AELUP) for JWA on January 11, 2022. Any proposed projects within the JWA AELUP would be subject to review by ALUC to determine whether they are consistent with the AELUP If/when a developer proposes an application on one of the candidate sites, additional environmental analysis for noise and safety would be conducted at that time.
Banning Ranch, a vacant site located on the north side of Pacific Coast Highway, was identified in the County's 5th Cycle Housing Element as a site to accommodate future housing needs and identified in the Housing Element Update. There have been comments supporting the inclusion of Banning Ranch in the County's Land Inventory and comments requesting its exclusion. Banning Ranch offers the potential for 1,475 units towards meeting the RHNA.	After careful consideration of the following: (1) recent efforts to conserve Banning Ranch as open space, including a private grant of $50 million, the California Department of Fish and Wildlife's announcement of a $8 million grant, and the United States Fish and Wildlife Service's announcement of a $11 million grant all to support the purchase of Banning Ranch by the Trust for Public Land, which recently entered into an exclusive agreement with the property owner to purchase the property; (2) past efforts to develop areas of Banning Ranch have been unsuccessful due to non-compliance with the California Environmental Quality Act (See e.g. Banning Ranch Conservancy v. City of Newport Beach, 2 Cal.5th 918 (2017), making the area challenging and costly to develop; and (3) Banning Ranch contains wildlife habitat that hosts endangered or threatened species and is designated for special protection under the Coastal Act, the Banning Ranch area is not reflected in the County's Draft Housing Element Update.

Table C-1
Summary of Public Comments

Comment	Response
The County issued permits for a limited number of affordable housing units during the 5th Cycle Housing Element. Suggest using County-owned sites and adopting an inclusionary housing policy to encourage the development of affordable housing.	Though potential housing opportunity sites are identified in the Housing Element, market conditions dictate whether housing will be built, the type of housing, and the actual income limits for that unit. The County has been successful in utilizing County-owned properties for affordable housing developments, as exemplified by the Crossroads at Washington project in the City of Santa Ana, and the Placentia Veteran's Village project in the City of Placentia and will continue to collaborate with CEO Real Estate on future affordable housing opportunities. Staff will continue to explore other innovative strategies to encourage affordable housing development, such as inclusionary housing.
Hills for Everyone requested that the Unincorporated Area: City of Brea (Aera Parcels) sites either be eliminated from consideration, or the number of units identified be revised.	After careful consideration of the comment letter received, the proposed 1,857 units from the Unincorporated Area: City of Brea (Aera Parcels) was removed from the Land Inventory.

Figure C-1
Letter of Support – C&C Development



C&C Development

Megan Kirkeby, Deputy Director
Housing Policy Development
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

RE: County of Orange Housing Opportunities Overlay Zone

Dear Ms. Kirkeby,

It is my pleasure to write a letter of support for the County of Orange Housing Opportunities Overlay Zone adopted by the Board of Supervisors in 2006. Through this innovative program, over 100 rental units reserved exclusively for lower-income families have been built in the unincorporated area.

Our organization C&C Development Co., LLC built the Buena Vista Apartments in the Orange area in 2009. Taking advantage of the County's Housing Opportunities Overlay Zone for Affordable Housing.

My organization fully supports the efforts of the County of Orange to provide as many viable sites as possible for the future development of much needed affordable housing in Orange County.

Sincerely,

Todd Cottle

Owner

C&C Development Co., LLC

Figure C-2
Letter of Support – American Family Housing

American Family Housing

Welcome Home

February 7, 2022

Megan Kirkeby, Deputy Director
Housing Policy Development
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

Dear Deputy Kirkeby,

It is my pleasure to write a letter of support for the County of Orange Housing Opportunities Overlay Zone adopted by the Board of Supervisors in 2006. Through this innovative program, over 100 rental units reserved exclusively for lower-income families have been built in the unincorporated area.

My organization fully supports the efforts of the County of Orange to provide as many viable sites as possible for the future development of much needed affordable housing in Orange County. As a nonprofit developer, American Family Housing has made use of the County's Housing Opportunities Overlay Zone regulations in support of helping the County of Orange address its regional housing needs.

Our organization built Potters Lane (16 units deed restricted as affordable), which opened in 2017. We are also set to achieve certificates of occupancy in June 2022 at Casa Paloma (71 units, of which 48 would be deed restricted as affordable). The County's Overlay Zone is critical to enabling the County to achieve its goals by making available parcels that were previously not available for residential development.

We appreciate the excellent working relationships that County staff has with housing developers, including American Family Housing, and would like to submit a letter of support for the County's Housing Opportunities Overlay Zone to the California Department of Housing and Community Development (HCD).

Sincerely and with appreciation,

Milo Peinemann
Chief Executive Officer

www.AFHusa.org

O 714.897.3221 · F 714.893.6858
15161 Jackson Street, Midway City, CA 92655

OC Public Works

OC Public Works | Development Services
601 N. Ross Street, Santa Ana, CA 9270