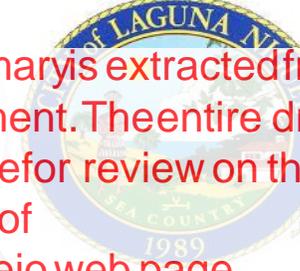


# ORANGE COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



This Executive Summary is extracted from a larger draft document. The entire draft document is available for review on the City of Mission Viejo web page [www.cityofmissionviejo.org](http://www.cityofmissionviejo.org)



Prepared by the Orange County Jurisdictions and the Lawyers' Committee for Civil Rights Under Law  
May 5, 2020

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## II. EXECUTIVE SUMMARY

Orange County's Analysis of Impediments to Fair Housing Choice (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 federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards the County's obligation to affirmatively furthering fair housing. 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 this AI. To provide a foundation for the conclusions and recommendations presented in this AI, the following information was reviewed and analyzed:

- Data from the U.S. Census Bureau, American Community Survey 2013-2017 and other sources about the demographic, housing, economic, and educational landscape of the County, nearby communities, and the broader Region;
- Various County and city planning documents and ordinances;
- Data reflecting housing discrimination complaints;
- The input of a broad range of stakeholders that deal with the realities of the housing market and the lives of members of protected classes in Orange County.

As required by federal regulations, the AI draws from the sources listed above 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 analysis also examines publicly supported housing in the County 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 AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

The Orange County AI is a collaborative effort between the following jurisdictions: Aliso Viejo, Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, Irvine, Laguna Niguel, La Habra, Lake Forest, La Palma, Mission Viejo, Orange, Rancho San Margarita, San Clemente, San Juan Capistrano, Santa Ana, Tustin, Westminster, and the County of Orange. Although this is a county-wide AI, there are jurisdiction-specific versions that include goals specific to each jurisdiction.

### Overview of Orange County

According to U.S. Census data, the population of Orange County has changed considerably from 1990 to present day. The population has grown from just over 2.4 million in 1990 to nearly 3.2 million people today. The demographics of the County have undergone even more dramatic shifts over this time period: the white population has gone from 76.2% in 1990 to 57.8% in the 2010 Census, with corresponding increases in Hispanic (from 13.5% to 21.2%) and Asian (from 8.6% to 18.3%) populations in that same time period. These trends represent accelerations of the broader Los-Angeles-Long Beach-Anaheim, CA Metropolitan Statistical Area (the Region). In the Region,

white population percentage has declined from 45.9% percent to under 31.6%, with substantial increases in the percentages of Hispanic (from 34.7% to 44.4%) and Asian (from 10.2% to 16%) from the 1990 to 2010 Censuses.

There are numerous ethnic enclaves of Hispanic, Vietnamese, Chinese and other groups throughout Orange County. These enclaves provide a sense of community and a social network that may help newcomers preserve their cultural identities. However, these active choices should not obscure the significant impact of structural barriers to fair housing choice and discrimination.

Within 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 percent 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.

There are 194,569 households in Orange County experiencing housing cost burden, with monthly housing costs exceeding 30 percent 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.

The federal Fair Housing Act and the California Fair Employment and Housing Act provide Orange County residents with some protections from displacement and work to increase the supply of affordable housing. In addition, jurisdictions throughout Orange County have worked diligently to provide access to fair housing through anti-housing discrimination work, creating housing opportunities designed to enhance resident mobility, providing zoning flexibility where necessary, and working to reduce hate crimes. Even so, these protections and incentives are not enough to stem the loss of affordable housing and meet the housing needs of low- and moderate-income residents.

### **Contributing Factors to Fair Housing Issues**

The AI includes a discussion and analysis of the following contributing factors to fair housing issues:

1. Access to financial services
2. Access for persons with disabilities to proficient schools
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability of affordable units in a range of sizes

7. Availability, type, frequency, and reliability of public transportation
8. Community opposition
9. Deteriorated and abandoned properties
10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
11. Displacement of residents due to economic pressures
12. Impediments to mobility
13. Inaccessible public or private infrastructure
14. Inaccessible government facilities or services
15. Lack of access to opportunity due to high housing costs
16. Lack of affordable, accessible housing in a range of unit sizes
17. Lack of affordable in-home or community-based supportive services
18. Lack of affordable, integrated housing for individuals who need supportive services
19. Lack of assistance for housing accessibility modifications
20. Lack of assistance for transitioning from institutional settings to integrated housing
21. Lack of community revitalization strategies
22. Lack of local private fair housing outreach and enforcement
23. Lack of local public fair housing enforcement
24. Lack of local or regional cooperation
25. Lack of meaningful language access for individuals with limited English proficiency
26. Lack of private investment in specific neighborhoods
27. Lack of public investment in specific neighborhoods, including services or amenities
28. Lack of resources for fair housing agencies and organizations
29. Lack of state or local fair housing laws
30. Land use and zoning laws
31. Lending discrimination
32. Location of accessible housing
33. Location of employers
34. Location of environmental health hazards
35. Location of proficient schools and school assignment policies
36. Location and type of affordable housing
37. Loss of affordable housing
38. Occupancy codes and restrictions
39. Private discrimination
40. Quality of affordable housing information programs
41. Regulatory barriers to providing housing and supportive services for persons with disabilities
42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
43. Source of income discrimination
44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings
45. Unresolved violations of fair housing or civil rights law.

## Proposed Goals and Strategies

To address the contributing factors described above, the AI plan proposes the following goals and actions:

### Regional Goals and Strategies

*Goal 1: Increase the supply of affordable housing in high opportunity areas.<sup>1</sup>*

Strategies:

1. Explore the creation of a new countywide source of affordable housing.
2. Using best practices from other jurisdictions, explore policies and programs that increase the supply affordable housing, such as linkage fees, housing bonds, inclusionary housing, public land set-aside, community land trusts, transit-oriented development, and expedited permitting and review.
3. Explore providing low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 80% of the Area Median Income to develop accessory dwelling units with affordability restriction on their property.
4. Review existing zoning policies and explore zoning changes to facilitate the development of affordable housing.
5. Align zoning codes to conform to recent California affordable housing legislation.

*Goal 2: Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, Vietnamese residents, other seniors, and people with disabilities.*

Strategies:

1. Explore piloting a Right to Counsel Program to ensure legal representation for tenants in landlord-tenant proceedings, including those involving the application of new laws like A.B. 1482.

*Goal 3: Increase community integration for persons with disabilities.*

Strategies:

1. Conduct targeted outreach and provide tenant application assistance and support to persons with disabilities, including individuals transitioning from institutional settings and individuals who are at risk of institutionalization. As part of that assistance, maintain a database of housing that is accessible to persons with disabilities.
2. Consider adopting the accessibility standards adopted by the City of Los Angeles, which require at least 15 percent of all new units in city-supported Low-Income Housing Tax Credit (LIHTC) projects to be ADA-accessible with at least 4 percent of total units to be accessible for persons with hearing and/or vision disabilities.

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<sup>1</sup> The term “high opportunity areas” generally means locations where there are economic and social factors and amenities that provide a positive impact on a person’s life outcome. This is described in more detail in Section iii, Disparities in Access to Opportunity.

*Goal 4: Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.*

Strategies:

1. Reduce barriers to accessing rental housing by exploring eliminating application fees for voucher holders and encouraging landlords to follow HUD's guidance on the use of criminal backgrounds in screening tenants.
2. Consider incorporating a fair housing equity analysis into the review of significant rezoning proposals and specific plans.

*Goal 5: Expand access to opportunity for protected classes.*

Strategies:

1. Explore the voluntary adoption of Small Area Fair Market Rents or exception payment standards in order to increase access to higher opportunity areas for Housing Choice Voucher holders.
2. Continue implementing a mobility counseling program that informs Housing Choice Voucher holders about their residential options in higher opportunity areas and provides holistic supports to voucher holders seeking to move to higher opportunity areas.
3. Study and make recommendations to improve and expand Orange County's public transportation to ensure that members of protected classes can access jobs in employment centers in Anaheim, Santa Ana, and Irvine.
4. Increase support for fair housing enforcement, education, and outreach.

## **Individual Jurisdictions' Proposed Goals and Strategies**

### **City of Aliso Viejo**

1. *In collaboration with the Orange County Housing Authority (OCHA):*
  - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
  - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
  - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
  - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*

## City of Anaheim

1. *Increase the supply of affordable housing through the following strategies:*
  - a. *Explore creative land use and zoning policies that facilitate the development of affordable housing, examples include a housing overlay zone or religious institutions amendment.*
  - b. *Review Anaheim's current Density Bonus and Accessory Dwelling Unit (ADU) Ordinances to ensure compliance with state requirements.*
  - c. *Support legislation that that removes CEQA requirements for affordable housing.*
  - d. *Continue to support tenant based rental assistance programs that facilitates additional affordable housing for homeless and low-income individuals.*
2. *Preserve the existing stock of affordable rental housing and rent stabilized housing through the following strategies:*
  - a. *Strengthen and expand education and outreach of tenants and owner of affordable rental housing at risk of conversion to market rents.*
  - b. *Extend affordability restrictions through loan extensions, workouts and buy-downs if affordability.*
  - c. *Preserve at-risk housing through the issuance of Tax-Exempt Bond financing.*
  - d. *Explore the development of a rental rehabilitation loan program.*
3. *Expand the access to fair housing services and other housing services through the following strategies:*
  - a. *Dedicate eligible entitlement dollars (CDBG, HOME, etc.) and explore local, state and federal resources to expand fair housing services.*
  - b. *Continue to support fair housing testing and investigation to look for evidence of differential treatment and disparate impact, including providing services to low income tenants reporting fair housing violations.*
  - c. *Continue to support fair housing presentations, mass media communications, and multi-lingual literature distribution; conduct fair housing presentations at accessible locations and conduct fair housing presentations for housing providers*
  - d. *Explore alternative formats for fair housing education workshops such as pre-taped videos and/ or recordings. Such formats could serve persons with one or more than one job, families with you children and other who find it difficult to attend meetings in person.*
4. *Continue efforts to build complete communities through the following strategies:*
  - a. *Maximize and secure funding from State of California's Cap and Trade Program (Greenhouse Gas Reduction Fund), to improve housing opportunities, increase economic investments and address environmental factors in disadvantaged communities.*
  - b. *The City will continue to work with local transit agencies and other appropriate agencies to facilitate safe and efficient routes of transportation, including public transit, walking and biking.*
  - c. *Explore development of a policy to encourage developers to provide residents with incentives to use non-auto means of transportation, including locating new developments near public transportation and providing benefits such as bus passes.*

- d. *Target workforce development resources in racially or ethnically concentrated areas of poverty to improve economic mobility.*

### **City of Buena Park**

1. *In collaboration with the Orange County Housing Authority (OCHA):*
  - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
  - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
  - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
  - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*

### **City of Costa Mesa**

1. *In collaboration with the Orange County Housing Authority (OCHA):*
  - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
  - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
  - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
  - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*

### **City of Fountain Valley**

1. *Explore an inclusionary zoning requirement for all new housing developments that requires at least 10-15 percent of for-sale units be affordable to households with incomes 80 percent or below and rental units be affordable to households with incomes 60 percent or below.*
2. *Consider adopting an expedited permitting and review process for new developments with an affordable housing set-aside.*

### **City of Fullerton**

1. *Create a Housing Incentive Overlay Zone (HOIZ).*
2. *Draft and Approve an Affordable Housing and Religious Institutions Amendment to the Municipal Code.*
3. *Work with the State to streamline or remove CEQA Requirements for Affordable Housing.*
4. *Require Affordable Housing in Surplus Property Sales.*

### **City of Garden Grove**

1. *Update Density Bonus Ordinance – Garden Grove will update the 2011 Density Bonus Ordinance to comply with current State law. The update will streamline the approval process, increase feasibility, and facilitate future housing development at all affordability levels.*
2. *Create Objective Residential Development Standards to allow for streamlined housing development in all residential zones.*
3. *Create Objective Development Standards for Supportive Housing. These standards would be for new construction of Supportive Housing.*
4. *Evaluate the creation of Objective Development Standards for Hotel/Motel/Office Conversion to Supportive Housing.*
5. *Review and amend Garden Grove’s current Accessory Dwelling Unit (ADU) Ordinance to comply with State requirements and further increase housing supply.*
6. *Continue to invest in landlord and tenant counseling and mediation services, unlawful detainer assistance, housing discrimination services, homebuyer education and outreach, and local eviction prevention strategies.*

### **City of Huntington Beach**

1. *Modify the existing Inclusionary Housing Ordinance to increase the supply of affordable housing opportunities available to lower income persons and households.*

- a. *Study the current methodology of setting the maximum sales price and down payment requirements of an affordable home for ownership.*
  - b. *Study requirements for the provision of inclusionary units through on-site units, dedication of land, in-lieu fees, and off-site development.*
  - c. *Study the in-lieu fee structure.*
  - d. *Explore the provision of incentives for developments that exceed inclusionary requirements and/or provide extremely low-income units on site. Incentives can be through the provision of fee waivers and deferrals, financial assistance, regulatory relief, and flexible development standards.*
2. *Update the density bonus ordinance to be consistent with state law,*
  3. *Expand the TBRA program to help tenants impacted by Covid-19. Currently, an eviction moratorium is in place to prevent evictions due to lack of non-payment of rent due to Covid-19. This moratorium ends on May 31, 2020. The moratorium does not end the obligation to pay the rent eventually. On June 1, 2020, there most likely will be an increased need from persons to receive rental assistance for the rents due prior to May 31 and going forward. The City would work with its current service providers to help tenants impacted by Covid-19.*

#### **City of Irvine**

1. *Ensure compliance with their HCD-certified Housing Element.*
2. *Update Density Bonus Ordinance – Irvine will update the Density Bonus Ordinance to comply with current State law.*
3. *Review and amend Irvine’s Inclusionary Housing Ordinance, as necessary, to increase its effectiveness.*
4. *Review and amend Irvine’s current Accessory Dwelling Unit (ADU) Ordinance to comply with State requirements and further increase housing supply.*
5. *Create Objective Development Standards for Supportive Housing. These standards would be for new construction of Supportive Housing.*
6. *Working with the City’s fair housing services provider, continue to invest in local eviction prevention strategies to reduce the number of homeless individuals and families in Irvine.*
7. *Working with the City’s fair housing services provider, continue to invest in landlord and tenant counseling and mediation services, unlawful detainer assistance, housing discrimination services, and homebuyer education and outreach.*

#### **City of La Habra**

1. *Explore the creation of an inclusionary housing ordinance to increase the number of affordable housing units.*

2. *Advocate for increasing the minimum percentage of affordable units at Park La Habra Mobile Home and View Park Mobile Home Estates from 20 percent to 50 percent.*

### **City of Laguna Niguel**

1. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
2. *In collaboration with the Orange County Housing Authority (OCHA):*
  - a. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - b. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
3. *Through the City's fair housing contractor:*
  - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
  - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
  - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
  - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
  - e. *Include testing/audits within the scope of work with fair housing provider.*
4. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
5. *Update zoning ordinance to comply with current State law.*
6. *In cooperation with the Orange County Transportation Authority, provide community education regarding transport services for persons with disabilities.*
7. *Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*

### **City of Lake Forest**

1. *In collaboration with the Orange County Housing Authority (OCHA):*

- a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
  - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
    - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
    - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
    - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
    - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
    - e. *Include testing/audits within the scope of work with fair housing provider.*
    - f. *Regularly consult with the City's fair housing contractor on potential strategies for affirmatively furthering fair housing on an on-going basis.*
  3. *In cooperation with the Orange County Transportation Authority:*
    - a. *Provide community education regarding transport services for persons with disabilities.*
    - b. *Explore bus route options to ensure neighborhoods with concentration of low-income or protected class populations have access to transportation services.*
  4. *Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*
  5. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
  6. *Update zoning ordinance to comply with current State law.*

### **City of Mission Viejo**

1. *In collaboration with the Orange County Housing Authority (OCHA):*
  - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*

- b. Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - c. In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
- 2. Through the City's fair housing contractor:*
  - a. Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
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  - c. Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
  - d. Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
  - e. Include testing/audits within the scope of work with fair housing provider.*
- 3. In cooperation with the Orange County Transportation Authority:*
  - a. Provide community education regarding transport services for persons with disabilities.*
  - b. Explore bus route options to ensure neighborhoods with concentration of low-income or protected class populations have access to transportation services.*
- 4. Monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City's fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.*
- 5. Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*
- 6. Seek funding through State programs (SB2/PLHA) to expand affordable housing and or homelessness prevention services.*
- 7. Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
- 8. Update zoning ordinance to comply with current State law.*

## **City of Orange**

- 1. Continue to follow current State Density Bonus law and further its implementation through a Density Bonus ordinance update.*

2. *Prepare a Transfer of Development Rights Ordinance to provide opportunities for development rights transfers to accommodate higher density housing in transit and employment-rich areas of the city.*
3. *Prepare and adopt a North Tustin Street Specific Plan with an objective of providing opportunities for affordable housing.*
4. *Amend the City's Accessory Dwelling Unit Ordinance to be consistent with State Junior Accessory Dwelling Unit (JADU) and Accessory Dwelling Unit (ADU) laws.*
5. *Prepare and adopt a small lot subdivision ordinance to streamline entitlement processing of housing development projects.*
6. *Continue providing CDBG funds to the Fair Housing Foundation to provide fair housing activities to the community.*

### **City of Rancho Santa Margarita**

1. *In collaboration with the Orange County Housing Authority (OCHA):*
  - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
  - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
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  - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
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  - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
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3. *In cooperation with the Orange County Transportation Authority:*
  - a. *Provide community education regarding transport services for persons with disabilities.*
  - b. *Explore bus route options to ensure neighborhoods with concentration of low-income or protected class populations have access to transportation services.*

4. *Monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City's fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.*
5. *Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*
6. *Seek funding through State programs (SB2/PLHA) to expand affordable housing and or homelessness prevention services.*
7. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
8. *Update zoning ordinance to comply with current State law.*

### **City of San Clemente**

1. *In collaboration with the Orange County Housing Authority (OCHA):*
  - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
  - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
  - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
  - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
  - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
  - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
  - e. *Include testing/audits within the scope of work with fair housing provider.*
3. *Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*
4. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*

5. *Update zoning ordinance to comply with current State law.*
6. *Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities by facilitating affordable housing throughout the community through 1) flexible development standards; 2) density bonuses; and 3) other zoning tools.*
7. *Review the type and effectiveness of current affordable housing development incentives, and amend/augment as may be necessary to increase the production of affordable housing units.*

### **City of San Juan Capistrano**

1. *Develop Strategies to Address Lack of Affordability and Insufficient Income*
  - a. *Work with developers, and non-profit organizations to expand the affordable housing stock within San Juan Capistrano.*
  - b. *Increase production of new affordable units and assistance towards the purchase and renovation of housing in existing neighborhoods.*
  - c. *Seek housing program resources through the County of Orange Urban County CDBG Program, and others which may become available.*
2. *Increase Public Awareness of Fair Housing*
  - a. *Increase fair housing education and outreach efforts.*
  - b. *Investigate options for enforcement including local enforcement conducted by neighboring jurisdictions.*
3. *Develop Strategies to Address Poverty and Low-Incomes Among Minority Populations*
  - a. *Expand job opportunities through encouragement of corporations relocating to the city, local corporations seeking to expand, assistance with small business loans, and other activities.*
  - b. *Support agencies that provide workforce development programs and continuing education courses to increase educational levels and job skills of residents.*
4. *Develop Strategies to Address Limited Resources to Assist Lower-Income, Elderly, and Indigent Homeowners Maintain their Homes and Stability in Neighborhoods*
  - a. *Consider implementing a volunteer program for providing housing assistance to elderly and indigent property owners, including assistance in complying with municipal housing codes.*
  - b. *Encourage involvement from volunteers, community organizations, religious organizations, and businesses as a means of supplementing available financial resources for housing repair and neighborhood cleanup.*

### **City of Santa Ana**

1. *Review and amend Santa Ana's inclusionary housing ordinance to increase its effectiveness.*
2. *Evaluate the creation of a motel conversion ordinance to increase the supply of permanent supportive housing similar to the City of Anaheim and Los Angeles.*

3. *Review Santa Ana's density bonus ordinance and explore adding a density bonus for transit-oriented development (TOD) similar to the City of Los Angeles.*
4. *Explore establishing a dedicated source of local funding for a Right to Counsel program for residents of Santa Ana to ensure that they have access to legal representation during eviction proceedings similar to the City of New York.*
5. *Continue to invest in local eviction prevention strategies to reduce the number of homeless individuals and families in Santa Ana.*

### **City of Tustin**

1. *In collaboration with the Orange County Housing Authority (OCHA):*
  - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
  - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
  - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
  - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
  - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
  - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
  - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
  - e. *Include testing/audits within the scope of work with fair housing provider.*
3. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
4. *Utilize funding through State programs (SB2) to support affordable housing and/or homeless prevention services.*
5. *Update zoning ordinance to comply with current State law.*

The AI lays out a series of achievable action steps that will help jurisdictions in Orange County to not only meet its obligation to affirmatively fair housing but to continue to be a model for equity and inclusion in Orange County.

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