

City of YORBA LINDA

**ANNUAL ACTION PLAN
JULY 1, 2014 – JUNE 30, 2015**

CITY OF YORBA LINDA
4845 Casa Loma Avenue
Yorba Linda, California 92886

CITY OF YORBA LINDA
2014-2015 ANNUAL ACTION PLAN

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EXECUTIVE SUMMARY

In prior years, the City of Yorba Linda opted to be a participating metropolitan city by completing the Urban County of Orange Five Year Consolidated Plan and accompanying Annual Action Plan to fulfill the requirements to receive Community Planning and Development (CPD) program funds from the U.S. Department of Housing and Urban Development (HUD).

Last year the City became an entitlement grantee, by which it is entitled to receive directly from HUD annual grants such as Community Development Block Grant (CDBG) funds on a formula basis. To receive an annual CDBG entitlement grant, the City must develop and submit to HUD a Consolidated Plan. The Consolidated Plan is a strategic plan for addressing the City's low and moderate-income housing and community development needs. The City prepared a three-year Consolidated Plan, covering 2012-2014, which was submitted and approved by HUD in Fall of 2012.

In addition, the City must also prepare and submit an Annual Action Plan that describes the resources, programs, activities, and actions Yorba Linda will use in the coming fiscal year to implement its strategic plan and ultimately achieve its Consolidated Plan goals and objectives. A summary of the Consolidated Plan goals for 2014-2015 is as follows:

Table E1: Summary of Consolidated Plan Priorities and FY 2014-15 Goals

3-Year Priority	Implementing Programs	FY 2014-15 Goal	Outcome/ Objective
Priority 1.1: Maintain and Strengthen Housing and Neighborhoods			
Improve the quality of ownership housing	Single-Family Homes and Mobile Homes Grants	12 housing units	DH – 1
Priority 4.1: Provide for New Community Facilities and Improve the Quality of Existing Facilities to Serve Low and Moderate Income			
Provide ADA accessibility for public facilities	ADA Compliance Program	1 facility	SL – 1
Priority 6.1: Provide Needed Community Services to Those of Low and Moderate Income			
Provide services for the elderly	Senior Nutrition Program	500 persons	SL – 2
Priority 8.1: Other Community Development Needs			
Consolidated Plan	CDBG Program Administration	NA	NA

Evaluation of Past Performance

HUD requires that the City evaluate its annual accomplishments by comparing planned activities to actual outcomes and by evaluating if progress was made toward meeting the Consolidated Plan goals and objectives¹.

In response, the City has successfully identified community development and housing needs through the following activities and strategies:

- In order to meet the needs of an aging population, the City supported public services geared toward the elderly through the City's Senior Nutrition Program.
- The City recognized that as the local housing stock ages, the Neighborhood Improvement Program will provide needed assistance to lower income homeowners whose homes need repair and improvement.
- The City has determined that there is great benefit in addressing certain architectural barriers in public buildings, parks and facilities in order to comply with Title II requirements through its *ADA Compliance Program*.

Fiscal Year (FY) 2013-2014 was the second year of Yorba Linda's three-year Consolidated Plan cycle in which the City expended CDBG funds for a variety of programs and projects to principally benefit low-and moderate-income households. The following Table E2 provides measurable outcomes of progress during the current program year (Fiscal 2013-14) which reflects the City's ability in meeting activity objectives.

As summarized below, major goals undertaken in FY 2013-14 are on target, with each of the goals being attained prior to June 30, 2014.

Table E2: Summary of FY 2013-14 Performance

FY 2012-2013 Objectives	Expected Outcome	Actual Outcome (% attained)
Number of housing units assisted through the Neighborhood Preservation Program	12	100%
Number of persons assisted by the Senior Nutrition Program	500	100%
Number of park facilities with ADA accessibility compliance	1	100%
Number of historically significant commercial properties in Town Center rehabilitated	0	0%

¹ Refer to HUD Notice CPD 03-09, "Development of State and Local Performance Measurement Systems for Community Planning and Development (CPD) Formula Grant Programs" and HUD "Notice of Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs."

The primary barriers the City faces in implementing its strategies are the following: 1) scarcity of local funds to supplement federal funding coupled with declining CPD program funding nationally, and 2) a need to upgrade administrative capacity as an entitlement jurisdiction. Illustrated by the chart below, the City has witnessed a precipitous decline in annual CDBG allocations resulting in recent reductions to federal CDBG appropriations. When combined with the loss of the Redevelopment Agency and uncertain future of the Low- and Moderate-Income Housing Fund (LMIHF), the City's financial ability to fund community development activities and affordable housing projects has been undermined.

Table E3: Reduction in CDBG Funds from FY 2009-10 to Present

Program Year	CDBG	Grant Reduction
Fiscal Year 2014 -2015	\$197,653	
Fiscal Year 2013 - 2014	\$212,515	
Fiscal Year 2012 - 2013	\$195,930	
Fiscal Year 2011 - 2012	\$242,280	
Fiscal Year 2010 - 2011	\$294,551	
Fiscal Year 2009 - 2010	\$272,908	
Grant Reduction from FY 2009-10 compared to FY 2014-15	- 27.5%	-\$75,255

FISCAL YEAR 2014-2015 ACTION PLAN

Background

In previous years, the City of Yorba Linda participated in the Urban Orange County Program as a Metropolitan City even though the City had entitlement status and received an allocation based on the HUD fair share formula. Yorba Linda applied for its first annual formula grant of Community Development Block Grant (CDBG) funds from the Department of Housing and Urban Development (HUD) in the 2012-13 funding cycle. The general purpose of these funds is to address the community development and housing needs of low-and moderate-income residents of the City.

The goals of the City's community development and housing programs covered by the City's Consolidated Plan and Annual Action Plan are to extend and strengthen partnerships among the City's departments and with the private sector, including for-profit and non-profit organizations, to enable them to provide decent housing; to establish and maintain a suitable living environment; and to expand economic opportunities for all residents, particularly for very low-income and low-income persons

The City of Yorba Linda's yearly Action Plan is a multi-purpose document. The Plan is the official application process for the City to receive yearly entitlement funds, creates a public document that describes and budgets the activities to be implemented in each fiscal year, and provides a participatory process through which our citizens are given an opportunity to determine, give input, and be informed about the projected use of Community Development Block Grant (CDBG) funds. More importantly, it is the tool that verifies and assists in the implementation of the goals, objectives, and priorities outlined in the Consolidated Plan to meet the City's housing and community development needs.

Last year the City also prepared its initial Consolidated Plan for the three-year period from FY 2012-13 through FY 2014-15. This is the third Annual Action Plan of the Consolidated Plan. It discusses the projects and programs that the City plans to assist during the year to address the Consolidated Plan priorities and to illustrate how Community Development Block Grant program funds will be applied to achieve those priorities.

1. Resources Available for Program Implementation

During FY 2014-15, the City will focus its resources and efforts on a variety of activities. Specific funding sources will be utilized based on the opportunities and constraints of each particular project or program. The City's goal is to leverage federal and local funds in order to meet the national objectives compliant with CDBG requirements.

The City's FY 2014-15 funding level under for the Community Development Block Grant (CDBG) program is shown in Table 1. The appropriation amount is determined by a statutory formula developed by HUD.

Table 1: 2014-15 CDBG Resources

Program Funds	Dollar Amount
CDBG	
Entitlement Grant	\$197,653
Program Income	\$0
Budgeted Carryovers	\$0
TOTAL – CDBG:	\$197,653

For FY 2014-15, Yorba Linda will have an estimated total of \$197,653 in CDBG entitlement funds. The City does not have any income from float-funded activities or surplus from urban renewal settlements, sale of real property, prior period adjustments, loans outstanding or written off, CDBG acquired property available for sale, or lump sum drawdown payments. Nor is the City funding any "urgent need activities." CDBG funds will be used for public services, public facilities, housing and CDBG administration. An estimated \$158,123 (CDBG entitlement of \$197,653

less \$39,530 in CDBG Program Administration) will be used for activities that benefit persons of low and moderate income.

Table 2: 2014-15 CDBG Allocations

Activity	Allocation
Housing Rehabilitation	\$ 75,000
ADA Compliance	\$ 53,475
Public Services	\$ 29,648
Total Program Expenditures	\$ 158,123
Administration (Admin at 20%)	\$ 39,530
Total CDBG Funding	\$ 197,653

The planned expenditures for program administration and public service activities for the FY 2014-2015 CDBG allocation are within regulatory limitations.

- The total amount of CDBG funds obligated for administration and planning activities (24 CFR 570.205 and 570.206) does not exceed 20 percent of the \$197,653 CDBG allocation *plus* 20 percent of program income received during the prior year.
- The total amount of CDBG funds obligated for public service activities (24 CFR 570.201(e)) does not exceed 15 percent of the \$197,653 CDBG allocation *plus* 15 percent of program income received during the prior year.

Table 4: Compliance with Statutory Expenditure Limits

Activity	Statutory Limit		FY 2014-2015 Allocation	
CDBG Administration	\$39,530	20%	\$39,530	20%
Public Services	\$29,648	15%	\$29,648	15%

The City is not using CPD formula grant funds to administer a homebuyer program in connection with its 2014-2015 Annual Action Plan. The City is not a recipient of HOME Investment Partnerships Program funds and is therefore not compelled to use the Single-Family 95 percent Median Area Purchase Price Limit for the area for the city's single-family residential rehabilitation program. Since the City does not receive HOME funds to refinance existing debt secured by multifamily housing rehabilitation, the City is not required to discuss its financing guidelines in the Annual Action Plan as required under 24 CFR 92.206(b), or submit them to HUD for approval.

2. Activities to be Undertaken

The City plans to undertake the following CDBG activities during FY 2014-15 to address its priority housing and community development needs.

Priority 1.1: Maintain and Strengthen Neighborhoods

Neighborhood Improvement Program
City of Yorba Linda
4845 Casa Loma Avenue, Yorba Linda, CA 92886
Funding Amount: \$75,000

CDBG funds are granted to low-and moderate-income owner occupants of single-family homes or mobile homes within a mobile home park to meet local codes, standards, and ordinances and for general property improvements. Rehabilitation grants to existing structures include repairs necessary for the proper operation of heating, plumbing and electrical systems; improvements for handicapped accessibility; and energy-related improvements. Mobile home improvements include repairs or replacement of roofs, porches, windows, and entry doors, including modification for handicapped accessibility as well as undercarriage repairs. Grants of up to \$5,000 are provided, with exceptions for high cost improvements (such as roofing) subject to Director's approval. The City's goal is to provide rehabilitation assistance to approximately 12 low- and moderate-income households per year.

Priority 4.1: Provide for New Community Facilities and Improve the Quality of Existing Facilities to Serve Low and Moderate Income

ADA Compliance Program
Various Public Facilities citywide
Funding Amount: \$53,475

Title II of the American with Disabilities Act (ADA) requires all public entities give individuals with disabilities an equal opportunity to benefit from all of their programs, services, and activities. Several of Yorba Linda's public buildings, parks, and facilities, constructed prior to the enactment of ADA in 1990, have noted items requiring retrofit in order to remove possible barriers. The City initiated Phase I of a mandated Transition Plan in 2011, which suggests a phased analysis of sites to identify and prioritize any deficiencies. As a result of the Transition Plan research the need to provide adequate ADA accessibility in public areas has become a high priority need

Priority 6.1: Provide Needed Community Services to Those of Low and Moderate Income

Senior Nutrition Program
Yorba Linda Community Center
4501 Casa Loma Avenue, Yorba Linda, CA 92886
Funding Amount: \$ 29,648

CDBG funds are used to offset the Senior Nutrition Program's ongoing operational costs, providing hot nutritional meals to senior (≥ 62 years of age) residents. Lunch is provided by the Community Senior Service Center five days a week at the Yorba Linda Community Center. The number of unduplicated beneficiaries expected to receive improved access to services will be 500 seniors in FY 2014-15

Priority 8.1: Other Community Development Needs

CDBG Program Administration

City of Yorba Linda

4845 Casa Loma Avenue Yorba Linda, CA 92886

Funding Amount: \$ 39,530

The City will conduct the following administration/planning activities: (1) General Administration of the overall CDBG Program, including preparation of the budget, applications, certifications, agreements and CDBG Service Area Resolution; (2) Coordination of all CDBG-funded, housing rehabilitation, capital improvement and public service activities; (3) Monitor all CDBG projects/programs to ensure compliance with federal regulations; (4) Preparation of the Annual Action Plan, (5) Report and manage the Integrated Disbursement and Information System (IDIS) and (6) Preparation of the Consolidated Annual Performance and Evaluation Report (CAPER).

Leveraging of Other Resources

Yorba Linda will leverage federal CDBG resources with other primary resources to support affordable housing activities:

Orange County Housing Authority (OCHA)

The Federal Section 8 Housing Assistance Program is funded by HUD and administered by the Orange County Housing Authority (OCHA) within Yorba Linda. The Section 8 program provides rental assistance payments to owners of private market-rate units on behalf of low-income tenants, aimed at ensuring tenants spend no more than 30 percent of their incomes on rent. Continued funding will assist 95 Section 8 housing vouchers currently in use in Yorba Linda.

Former Redevelopment Housing Set-Aside Funds

The primary local source of funds for affordable housing in Yorba Linda has traditionally been its Redevelopment Agency's Low- and Moderate-income Housing Fund, which generated approximately \$4.5 million per year for housing activities. However, due to passage of Assembly Bill (AB) 1X 26, redevelopment agencies across California have been eliminated as of February 1, 2012, removing the primary local tool for creating affordable housing.

As a result of that action, redevelopment funds will no longer be available as leverage for use with Community Development Block Grant (CDBG) funds.

Low- and Moderate-Income Tax Credits

The Federal Low Income Housing Tax Credit Program was established in 1986, replacing traditional housing tax incentives, such as accelerated depreciation, with a tax credit that enables low-income housing sponsors to raise project equity through the sale of tax benefits to investors. Each state must designate a “housing credit agency” to administer the Credit program. In California, responsibility for administering the program was assigned to the California Tax Credit Allocation Committee (TCAC).

Two types of federal tax credits are available and are generally referred to as nine percent (9%) and four percent (4%) credits. These terms refer to the approximate percentage of a project’s “qualified basis” a taxpayer may deduct from their annual federal tax liability in each of ten years. The City will be pursuing two tax credit deals with National CORE for a 68-unit and 54-unit affordable housing project in Savi Ranch.

Private Sector Resources

Private sector participants may include lending institutions and for-profit development entities. Lending institutions may be the source of low-cost loans for affordable housing and rehabilitation projects. Developers are the primary providers of the housing stock and are encouraged to participate in low-income housing in a variety of ways, including through density bonuses and participation in the Low-Income Housing Tax Credit (LIHTC) program.

The City supports applications by other entities for projects and programs that address the goals and objectives set forth in the Consolidated Plan. They fund numerous non-profit housing and community development organizations that use foundation and private funds in combination with State and Federal funds to provide housing and community development services and improvements throughout the City. Table 5 describes each potential source in FY 2014-15 that will meet the priority needs and objectives in the City’s FY 2012/13 – 2014/15 Consolidated Plan, as well as the activities for which non-HUD resources may be used.

Table 5: Other Projected Resources in FY 2014-15

Program Name	Description	Eligible Activities
1. Federal Programs		
Community Development Block Grant (CDBG)	Grants awarded to the City on a formula basis for housing and community development activities primarily benefiting low and moderate income households. As an entitlement jurisdiction, Yorba Linda will receive approximately \$197,653 in CDBG funds annually from HUD.	<ul style="list-style-type: none"> ▪ Property Acquisition ▪ Relocation and Demolition ▪ Rehabilitation ▪ Public Facilities/Improvements ▪ Economic Development ▪ Public Services

Program Name	Description	Eligible Activities
HOME	Flexible grant program potentially available to the City through the County for housing activities benefiting low- and moderate-income households. The City is not currently a HOME participant.	<ul style="list-style-type: none"> • New Construction • Acquisition • Rehabilitation • Relocation Costs • Tenant-based Rental Assistance
Section 8 Rental Assistance Program	Rental assistance payments to owners of private market rate units on behalf of low-income (50% MFI) tenants. Administered by Orange County Housing Authority. Approximately 95 Yorba Linda residents currently receive Section 8 housing vouchers.	<ul style="list-style-type: none"> • Rental Assistance
Emergency Shelter Grants (ESG)	Grants potentially available to the City through the County to implement a broad range of activities that serve homeless persons.	<ul style="list-style-type: none"> • Shelter Construction • Shelter Operation • Social Services • Homeless Prevention
2. State Programs		
Low-income Housing Tax Credit (LIHTC)	Tax credits are available to persons and corporations that invest in low-income rental housing. Proceeds from the sale are typically used to create housing.	<ul style="list-style-type: none"> • New Construction
Multi-Family Housing Program (MHP)	Deferred payment loans to local governments, non-profit developers and for-profit developers for new construction, rehabilitation and preservation of permanent and transitional rental housing for lower income households.	<ul style="list-style-type: none"> • New Construction • Rehabilitation • Preservation
California Housing Finance Agency (CHFA) Rental Housing Programs	Below market rate financing offered to builders and developers of multiple-family and elderly rental housing. Tax exempt bonds provide below-market mortgages.	<ul style="list-style-type: none"> • New Construction • Rehabilitation • Acquisition of properties from 20 to 150 units
California Housing Finance Agency Home Mortgage Purchase Program	CHFA sells tax-exempt bonds to make below market loans to first-time homebuyers. Program operates through participating lenders who originate loans for CHFA.	<ul style="list-style-type: none"> • Homebuyer Assistance
3. County Programs		
Mortgage Assistance Program	The County of Orange provides mortgage loans to first time homebuyers. The Affordable Housing Clearinghouse provides the homebuyer services for the County	<ul style="list-style-type: none"> • Homebuyer Assistance

Program Name	Description	Eligible Activities
Mortgage Credit Certificate (MCC)	The County of Orange offers the MCC program in partnership with Affordable Housing Applications. The MCC is a Federal Income Tax Credit program, effectively reducing the applicant's taxes and increasing their net earnings. The County's MCC program is currently on hold.	<ul style="list-style-type: none"> • Income Tax Credit
4. Local Programs		
Tax Exempt Housing Revenue Bond	The City can support low-income housing by issuing housing mortgage revenue bonds requiring the developer to lease a fixed percentage of the units to low-income families at specified rental rates. The bond amount is allocated at the State level and issued at the local level.	<ul style="list-style-type: none"> • New Construction • Rehabilitation • Acquisition

3. Geographic Distribution

The Federal Housing and Community Development Act of 1974 determined that the City receives annual entitlement funding based on a statutory formula related to demographic and economic information, such as low and moderate-income populations within the County. Programs and activities funded through the CDBG Program must meet one of three national objectives, namely: benefit low- and moderate-income families, aid in the prevention or elimination of slums or blight or meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare (24 CFR 570.200(a)(2)).

The City utilizes CDBG funds to assist programs that principally benefit low- and moderate-income persons, either targeting assistance in predominately low and moderate-income census block groups (low and moderate area benefit) or to persons who qualify due to income (limited clientele). The activities funded in FY 2014-15 cater primarily to low- and moderate-income persons presumed to be income eligible (e.g., seniors) or whose income is determined to be income eligible (viz., persons provided CDBG assistance from commercial and residential rehabilitation activities).

Should the City later undertake activities benefiting persons residing in predominately low and moderate-income (LMI) areas, it would do so under the guise of an exception criteria" or the "upper quartile". HUD permits an exception to the LMI area benefit requirement that an area contain 51 percent LMI residents. This exception applies to entitlement communities that have few, if any, areas within their jurisdiction that have 51 percent or more LMI residents. A grantee qualifies for this exception when less than one quarter of the populated block groups contain 51 percent or more LMI persons.

Accordingly, HUD has determined that the following census block groups in Yorba Linda qualify for the exception criteria as LMI areas based upon an upper quartile percentage

of 26.49 percent of the households are low and moderate-income. It is estimated that 70-75% of the program expenditures in FY 2014-15 will be spent within target areas in Yorba Linda.

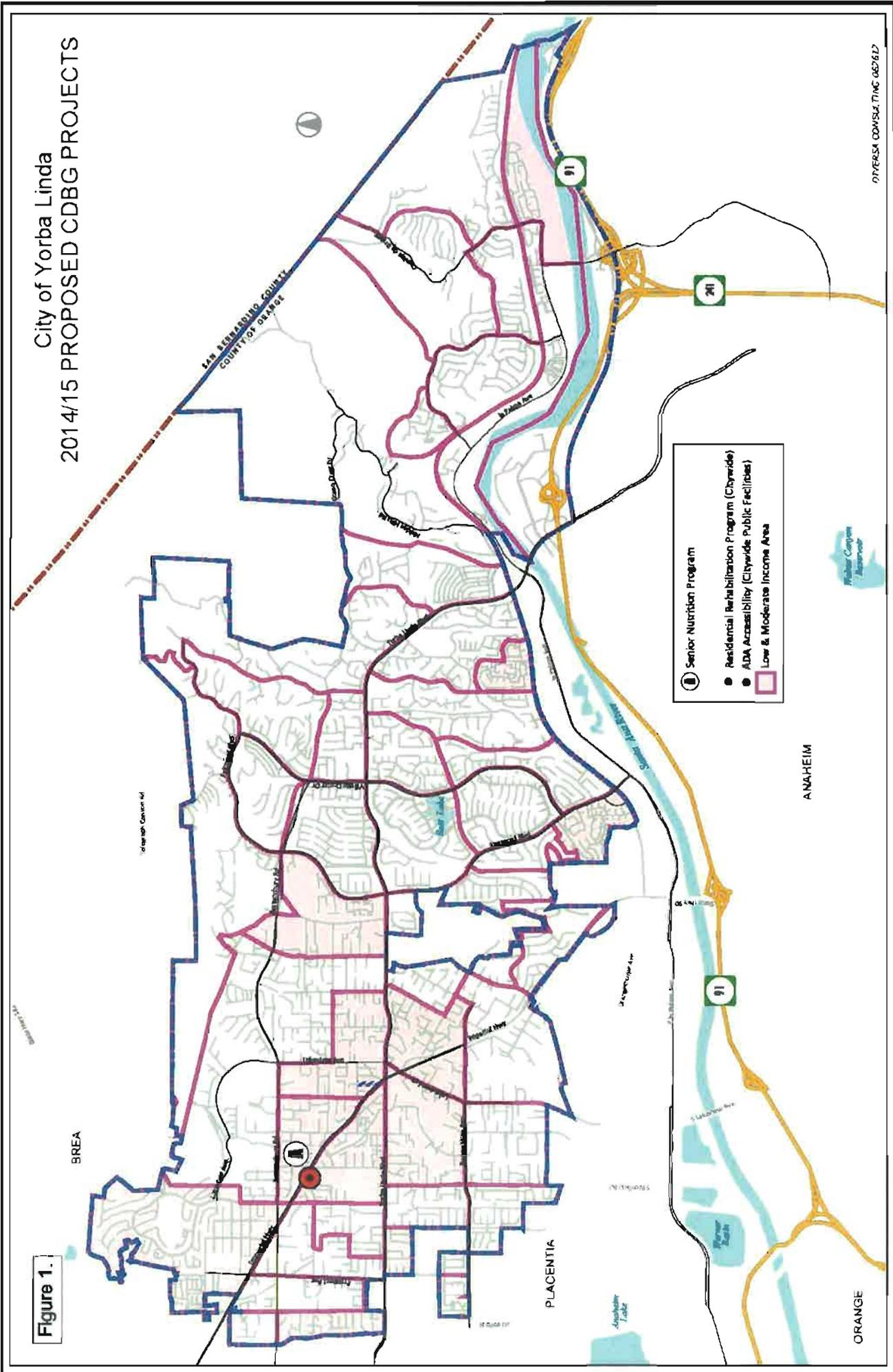
Table 6: Qualifying Low/Mod Income Census Block Groups

Census Tract	Block Group	% of Low/Mod Hshlds	Census Tract	Block Group	% of Low/Mod Hshlds
021802	5	40.50	021802	4	29.10
021802	1	37.50	021815	1	28.70
021810	1	34.40	021802	2	27.50
011718	1	33.20	021822	3	27.10
021830	4	30.70	021802	3	26.50
021826	2	29.90	021817	1	26.50

Figure 1 depicts the geographic location of CDBG-funded activities to be undertaken in 2014-15, as well as low- and moderate-income areas in the City.

Figure 1.

City of Yorba Linda 2014/15 PROPOSED CDBG PROJECTS



4. Relation to Strategic Plan Priorities

The Yorba Linda 2012/13-2014/15 Consolidated Plan identifies priority housing and community development needs to be addressed through CDBG funding. Each of these priorities includes a series of implementing programs and three-year objectives. To ensure that the activities planned in the Annual Action Plan are consistent with this three year strategy, Table 7 depicts the relationship between these planned activities and the 2012/13-2014/15 Consolidated Plan priorities.

Table 7: Relationship Between One-Year Activities and Strategic Plan Priorities

3-Year Priority	Implementing Programs	3-Year Objective	1-Year Objective
Priority 1.1: Maintain and Strengthen Housing and Neighborhoods			
Improve the quality of ownership housing	Single-Family Homes and Mobile Homes Grants	36 households	12 households
Priority 4.1: Provide for New Community Facilities and Improve the Quality of Existing Facilities to Serve Low and Moderate Income			
Provide ADA accessibility in public facilities	ADA Compliance	4 facilities	1 facility
Priority 6.1: Provide Needed Community Services to Those of Lower and Moderate Income			
Provide services for the elderly	Senior Nutrition Program	1500 persons	500 persons

5. Annual Objectives and Outcome Measures

The national objectives and performance outcomes established by HUD provide the framework for assigning priorities to needs for which funding may be allocated. The following three national objectives are to develop viable urban neighborhoods by:

- Providing a Suitable Living Environment (SL) – In general, this objective relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment.
- Providing Decent Housing (DH) –This objective focuses on housing programs where the purpose of the program is to meet individual family or community needs and not programs where housing is an element of a larger effort, as such programs would be more appropriately reported under Suitable Living Environment.
- Expanding Economic Opportunities (EO) – This objective applies to the types of activities related to economic development, commercial revitalization, or job creation.

Performance outcomes are grouped into the following three categories:

- (Outcome 1) Availability/Accessibility – This outcome category applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low and moderate income people, including persons with disabilities. Accessibility does not refer only to removal of physical barriers, but also to making the basis of daily living available and accessible to low and moderate income people where they live.
- (Outcome 2) Affordability – This outcome category applies to activities that provide affordability in a variety of ways in the lives of low and moderate income people. It can include the creation or maintenance of affordable housing, basic infrastructure improvements, or services such as day care.
- (Outcome 3) Sustainability – This outcome category applies to promoting livable or viable communities through activities aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low and moderate income, or by removing or eliminating slums or blighted areas through multiple activities or services that sustain communities or neighborhoods.

Pursuant to HUD requirements for use of an outcome performance measurement system, the following numbering system is used to identify the objective and outcome categories corresponding to each FY 2014-15 activity.

Table 8: Objectives and Outcomes Numbering System

Objective Category	Outcome Category		
	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Table 9 highlights the annual outcomes Yorba Linda intends to achieve based on the FY 2014-15 Annual Action Plan. For each activity, a specific one-year objective is identified, an outcome/objective category assigned (pursuant to the numbering system presented in Table 8 above), and the three-year objective as identified in the Consolidated Plan.

Table 9: Statement of Specific Annual Objectives

Specific Obj. #	Specific Annual Objectives	Sources of Funds	Performance Indicators	Fiscal Year	Expected Number	Actual Number	Percent Completed
DH - 1 Availability/Accessibility for the purpose of providing Decent Housing							
DH - 1.1	NEIGHBORHOOD IMPROVEMENT PROGRAM Address need for availability of decent housing by offering rehabilitation assistance to low- and moderate-income households.	CDBG	Total Number of Housing Units Assisted	2012	12	9	75%
				2013	12	12	100%
				2014	12		
				Total	36	21	58%
DH - 2 Affordability for the purpose of providing Decent Housing							
DH - 2	NO PROGRAMS FIT THIS CATEGORY						
DH - 3 Sustainability for the purpose of providing Decent Housing							
DH - 3	NO PROGRAMS FIT THIS CATEGORY						
SL - 1 Availability/Accessibility for the purpose of creating a Suitable Living Environment							
SL - 1.1	ADA COMPLIANCE PROGRAM Provide adequate ADA accessibility in parks	CDBG	Total Number of Facilities Assisted	2012	1	4	100%
				2013	1	0	
				2014	2		
				Total	4	4	100%
SL - 2 Affordability for the purpose of creating a Suitable Living Environment							
SL - 2	NO PROGRAMS FIT THIS CATEGORY.						
SL - 3 Sustainability for the purpose of creating a Suitable Living Environment							
SL - 3.1	SENIOR NUTRITION PROGRAM Improve the sustainability of a suitable living environment by providing hot nutritional meals to the elderly population.	CDBG	Total Number of People Assisted	2012	500	500	100%
				2013	500	500	100%
				2014	500		
				Total	1500	1000	66%
EO - 1 Availability/Accessibility for the purpose of creating Economic Opportunity							
EO - 1	NO PROGRAMS FIT THIS CATEGORY						
EO - 2 Affordability for the purpose of creating Economic Opportunity							
EO - 2	NO PROGRAMS FIT THIS CATEGORY						
EO - 3 Sustainability for the purpose of creating Economic Opportunity							
EO - 3	TOWN CENTER HISTORIC PRESERVATION PROGRAM Enhance the availability of economic opportunity by offering rehabilitation grants to local businesses	CDBG	Total Number of Businesses Assisted	2012	1	1	100%
				2013	4	0	0%
				2014	1		
				Total	6	1	16%

Yorba Linda has historically used CDBG funds for affordable housing programs such as homeowner rehabilitation. However, the annual housing goals reflected in Table 10 are limited to Section 215 affordable housing requirements under the Federal HOME Investment Partnerships Program. Pursuant to Section 215, HUD defines a rental unit as an affordable housing unit if it is occupied by an extremely low, low, or moderate-income tenant and it bears a rent eligible under HOME regulations. At least 20% of units in projects with five or more units that are restricted must have Low HOME rents, with the balance of restricted units subject to High HOME rents.

Section 215 defines ownership housing as affordable if it is purchased by an extremely low, low, or moderate-income first-time homebuyer, and has a sales price that does not exceed the mortgage limits for the type of single-family housing for the area under 203(b) limits and carries either resale or recapture provisions. Housing that is rehabilitated and owned by a family when assistance is provided qualifies as affordable if it is occupied by an extremely low, low or moderate-income family, and has an after-rehabilitation value that does not exceed the 203(b) mortgage limits.

Table 10: Annual Housing Completion Goals

	Annual Expected Number Completed	CDBG	HOME	ESG	HOPWA
ANNUAL AFFORDABLE HOUSING GOALS (SEC.215)					
Homeless households	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC.215)					
Acquisition of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Production of new units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Affordable Rental	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC.215)					
Acquisition of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Production of new units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homebuyer Assistance	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Affordable Owner	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE HOUSING GOALS (SEC.215)					
Acquisition of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Production of new units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homebuyer Assistance	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec 215 Affordable Housing	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL HOUSING GOALS					
Annual Rental Housing Goal	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Annual Housing Goal	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Monitoring

The City of Yorba Linda will monitor progress on activities carried out in furtherance of its Consolidated Plan to ensure compliance with program requirements, reporting on project compliance, funding use, and compliance via the Consolidated Annual Performance and Evaluation Report (CAPER). The overall process begins with the development of needs and an Annual Action Plan. Through agreements with subrecipients (viz., City Departments or public agencies), housing and business owners, the Community Development Department sets the stage by incorporating goal requirements and reporting procedures, by outlining specific objectives, timelines and budgets against which performance is measured.

As illustrated in Table 11, the City and its former Redevelopment Agency have facilitated the development or acquisition/rehabilitation of six multi-family residential developments, totaling 489 lower income affordable units. Pursuant to Redevelopment Statutes, each of these projects maintains 55 year affordability covenants and is monitored for compliance.

Table 11: Assisted Rental Housing Inventory

Project Name	Project Type	Total Units	Affordable Units	Funding	Affordability Period
Archstone Yorba Linda (previously Riverbend)	Family Rental Housing	400	80	Orange County Bonds	2029
Victoria Woods	Senior Rental Housing	125	124	RDA Set-Aside	2051
Arbor Villas	Family Rental Housing	67	66	RDA Set-Aside	2052
Parkwood	Senior Rental Housing	100	100	RDA Set-Aside	2060
Meta Housing	Family Rental Housing	44	44	Density Bonus; RDA Set-Aside	2061
Villa Plumosa	Family Rental Housing	76	75	RDA Set-Aside	2063

In addition to the above projects, the former Yorba Linda Redevelopment Agency has entered into an Affordable Housing Agreement with Orange Housing Development Corporation (OHDC) to acquire available units in condominium sites with high rates of foreclosure and/or economic blight for conversion to affordable rental housing. As of June 2014, OHDC had completed the purchase and rehabilitation of 32 units and conversion to affordable rentals for a 55 year affordability period.

7. Homeless Strategy

The City of Yorba Linda is part of the O.C. Partnership, a countywide Continuum of Care that brings together government agencies and community based agencies to address homelessness on a regional basis. The City understands that homelessness is caused by a variety of factors and that only through coordination of services and resources can the City be better positioned to address the issue. The City will continue to seek partnerships and funding opportunities, if eligible, to address Continuum of Care needs. In following the Continuum of Care model: 1) actions to prevent homelessness, 2) actions to address emergency shelter and transitional housing needs; and 3) actions to preserve and maintain existing affordable housing, Yorba Linda will undertake the actions described below to address chronic homelessness.

Yorba Linda's adopted Housing Element (October 2011) indicates that the Orange County Housing and Community Services Department (HCS) estimates the homeless population in Orange County at 35,000 persons comprised of about 30 percent individuals and 70 percent families, including an estimated 16,300 homeless children. For these 35,000 homeless persons, there are only about 3,400 available beds, including 1,512 emergency shelter beds and 1,888 beds in transitional housing facilities. An additional 1,875 units of supportive services housing are available.

The 2009 Orange County Homeless Census and Survey interviewed 571 homeless individuals throughout the County whose most recent residence was within Orange County. Of these, four homeless individuals identified Yorba Linda as their last place of residence, reflecting less than one percent of the total 571 homeless population. Another measure of homeless is the information collected by the Orange County Department of Education on the number of homeless children and youth for each school district in the County. For school year 2006-2007, a total of 19 homeless children and youth were reported within the Placentia-Yorba Linda Unified School District (PYLUSD).

For purposes of better understanding the nature of the homeless population within Yorba Linda, the Housing Element notes that interviews were conducted with HCS staff; Orange County Partnership (a non-profit organization that coordinates homeless services throughout the County); and the Brea/Yorba Linda Police Department. It was concluded that the homeless observed in Yorba Linda are principally transient, moving through the City along Imperial Highway and Yorba Linda Boulevard. However, on occasion, the Police have observed some small (1-2 people) encampments in the Featherly Regional Park area.

Actions to Prevent Homelessness

The City continues support of efforts to implement the Orange County Continuum of Care program for the homeless and persons and families at-risk of homelessness, as indicated by Priority 2.1 of the Consolidated Plan. In addition, the City is taking the following steps to help prevent homelessness:

- Lower income households overpaying for housing are likely to be at risk of becoming homeless upon loss of employment. The City and its former Redevelopment Agency have assisted in the provision of well over 500 units of rental housing provided at affordable housing cost to lower income households. In addition, the City coordinates with the Orange County Housing Authority to provide Section 8 rental assistance to homeless individuals and families as well as those at risk of becoming homeless. Approximately 90 low-income households in Yorba Linda currently receive assistance.
- The City will continue to contract with the Orange County Fair Housing Council to provide a wide range of fair housing services to ensure equal housing opportunities for its residents. By mediating disputes between tenants and property owners, the Fair Housing Council helps to minimize evictions and unjust rent increases.

Actions to Address Emergency Shelter and Transitional Housing Needs

- In conjunction with adoption of the Housing Element in Fall of 2011, the City adopted a package of zoning implementation measures to facilitate special needs housing. These measures included:
 - Allowing transitional and supportive housing as a permitted use in all residential zones subject to the same standards as similar residential uses.
 - Allowing emergency shelters with up to 30 occupants as a permitted use in the M-1 zone, and a conditionally permitted use in the M-1 zone for shelters with greater than 30 occupants.
 - Allowing single room occupancy hotels (SROs) as a conditionally permitted use in the RM-20 and RM-30 zone districts.
- “2-1-1 Orange County” provides a comprehensive information and referral system to link County residents with community health and human services support. The service is available seven days a week, 24 hours a day. Callers are connected with certified, multi-lingual information and referral specialists who utilize a database to provide information on services including shelter and housing resources, food, and substance abuse assessment and treatment.

- The City's Housing Element provides the following inventory of facilities and services for the homeless that serve Yorba Linda.

Table 12: Homeless Services and Facilities Near Yorba Linda

Organization	Beds and/or Services Provided
Anaheim Interfaith Center P.O. Box 528 Anaheim, CA 92815 (714) 774-8502	Provides transitional housing and supportive services for 9 homeless families – for a 6-9 month period. Case management counseling, and other services are provided.
Fullerton Interfaith Emergency Services (New Vista Shelter) 244 E. Valencia, Room 16 Fullerton, CA 92634 (714) 680-3691	Provides transitional housing for families and singles for up to 4 months. Also provides food, basic supplies, case management, referrals, and childcare assistance.
H.I.S. House P.O. Box 1293 Placentia, CA 92670 (714)993-5774	Provides 40 beds for families and individuals for up to 6 months. Services include job counseling and referrals, job training, financial management, counseling, and life skills classes.
Lutheran Social Services 215 N. Lemon Street Fullerton, CA (714) 738-1058	Provides clothing, limited transportation, referrals, prescriptions, utilities, counseling and English as a Second Language (ESL) classes.
Orange County Rescue Mission One Hope Drive Tustin, CA 92782 (714) 247-4300	Provides transitional and emergency housing, including housing for domestic violence victims, families and singles. Redeveloping the Tustin Marine Corps Air Station to create a unique full service facility to address the needs of the homeless. Provides food assistance, counseling, education, job training, mental wellness, life skill training, and medical services to provide a solid foundation for the transition to self-sufficiency.
Salvation Army Emergency Family Services Offices 1515 West North Street Anaheim, 92801 (714) 491-1020	Provides food distribution, utility assistance, transportation (gas vouchers, bus tickets), clothing, household items, other forms of assistance and community referrals.
Sheepfold Women's Services Center Anaheim, CA (714) 237-1444	The Service Center in Anaheim provides assistance with legal obligations, medical and dental appointments. Sheepfold also provides transitional housing at a facility in Brea for battered women and their children, with a capacity of 6 families.

Actions to Preserve and Maintain Existing Affordable Housing

The following three Consolidated Plan priorities speak to maintaining and preserving the City's affordable housing: Priority 1.1: Strengthen housing and neighborhoods; Priority 1.2: Expand the supply of affordable housing; Priority 1.3: Preserve existing affordable housing.

Programs the City implements under these priorities include:

- Affordable housing development assistance
- Conversion of multi-family rental to affordable
- Purchase of existing multi-family ownership units to create affordable rental
- Section 8 rental assistance
- Residential rehabilitation program
- Community preservation and abatement

There are several non-profit agencies that serve as resources in meeting the housing needs of the City, and are integral in implementing activities for acquisition/rehabilitation, preservation of assisted housing, and development of affordable housing for the homeless or are at-risk of homelessness.

Table 13: Non-Profit Housing Resources

Habitat for Humanity	Habitat is a non-profit, Christian organization that builds and repairs homes for sale to very low income families with the help of volunteers and homeowner/partner families. Habitat homes are sold to partner families at no profit with affordable, no interest loans.
Jamboree Housing Corporation (JHC):	JHC is a non-profit developer that has developed and implemented numerous affordable housing projects and has also established an in-house social services division to assist residents in maintaining self-sufficiency. "Housing with a HEART" (Helping Educate, Activate and Respond Together).
National Community Renaissance (previously Southern California Housing Development Corporation)	National CORE's mission is to create affordable housing communities that contribute to neighborhood vitality. The company owns and manages more than 4,500 multi-family units throughout Southern California and serves more than 10,000 residents. As part of its inclusive approach to improving quality of life in Southern California communities, it staffs community resource centers at all its properties.
Orange Housing Development Corporation (OHDC)	OHDC's primary focus is within Orange County, but has developed over 3,000 units in communities throughout California.

8. Meeting Underserved Needs

The City of Yorba Linda has identified long-range strategies, activities and funding sources to implement the goals in the areas of housing and community development services for the benefit of the residents.

- The City will continue to seek other resources and funding sources to address the biggest obstacle to meeting the community's underserved needs, which is the lack of funding and/or inadequate funding.
- The City will look for innovative and creative ways to make its delivery systems more comprehensive and will continue existing partnerships with both for-profit and not-for-profit organizations.

- The City will continue entering into affordable housing agreements with developers for the acquisition, rehabilitation and management of rental units for low and moderate income families and seniors.
- The City is currently addressing certain housing needs with federal funds such as availability, condition, fair housing practices and short term rental assistance to prevent homelessness.
- The City is also addressing community development needs with federal funds such as improving public facilities. Local funds may also be used to address gaps such as economic development needs and infrastructure deficiencies.

9. Fostering and Maintaining Affordable Housing

One of the priorities of the City is to preserve its existing affordable housing stock through rehabilitation, and to increase the supply of affordable housing through new construction and acquisition/rehabilitation.

Yorba Linda's Neighborhood Preservation Program provides financial assistance to qualified property owners for the rehabilitation of owner-occupied residential properties. The City's goal for 2014/15 is to provide CDBG rehabilitation grants to improvement 12 single-family homes and mobile homes.

In partnership with Orange Housing Development Corporation (OHDC), the City will utilize non-federal funds to continue to purchase scattered site condominium units for rehabilitation and conversion to affordable rental housing.

In October 2011, the Yorba Linda City Council adopted its 2008-2014 Housing Element which identifies 14 sites encompassing 53 acres for rezoning at multi-family densities suitable to facilitate development of housing affordable to low and moderate income households. In June 2012, the majority of Yorba Linda voters approved the rezoning. The City is working with property owners on several of the rezone sites to obtain the necessary entitlements for the development of affordable and mixed income housing. City CDBG funds will not be used in support of these projects.

10. Removing Barriers to Affordable Housing

The City firmly believes that its policies and current practices do not create barriers to affordable housing. The State Department of Housing and Community Development, in their review of Yorba Linda's 2014-2021 Housing Element, determined the City's land use controls, building codes, fees and other local programs intended to improve the overall quality of housing do not serve as a development constraint. Furthermore, the City's Housing Element sets forth the following programs as a means of continuing to facilitate the production of affordable housing:

- Affordable Housing Development Assistance
- Mortgage Assistance
- Conversion of Multi-family Rental to Affordable
- Purchase of Existing Multi-family Ownership Units to Create Affordable Rental
- Rezoning to Higher Densities
- Multifamily Development Standards and Processing Procedures
- Measure B Election (to allow up zoning and height increases)
- Affordable Housing Density Bonus
- By-Right Zoning Provisions for Emergency Shelters, Transitional Housing, Supportive Housing and Second Units

To specifically address the removal of barriers for persons with disabilities, Yorba Linda has adopted a Reasonable Accommodation Ordinance. The Ordinance clearly sets forth the procedures under which a disabled person may request a reasonable accommodation in application of the City's land use and zoning regulations. Such a request may include a modification or exception to the requirements for siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers. Reasonable accommodation requests may be approved ministerially by the Community Development Director, eliminating the requirement for the disabled applicant to undergo a zoning variance.

11. Public Housing

The City of Yorba Linda does not have any public housing developments. However, Yorba Linda is one of a number of cities that benefits from the services of the Orange County Housing Authority (OCHA's), which is currently managing Housing Choice Vouchers for residential units within Yorba Linda.

12. Evaluate and Reduce Lead-Based Paint Hazard

Housing age is the key variable used to estimate the number of housing units with lead-based paint. According to HUD, approximately 40 percent of the homes in the United States have lead-based paint somewhere in the unit. HUD has established national averages to estimate the amount of lead-based paint in a community. According to these national averages, approximately 90 percent of housing units built before 1940 have lead-based paint. Units built from 1940 to 1959 have an estimated incidence of 80 percent, while units built between 1960 and 1979 have an incidence of 62 percent. Using these national estimates, Table 14 approximates the number of housing units with lead-based paint in Yorba Linda, and estimates the number of these units occupied by low and moderate income households based on the CHAS databook. As illustrated in this Table, an estimated 1,048 low/mod owner-occupied units and 573 low/mod renter-occupied units in Yorba Linda may contain lead based paint.

Table 14: Estimate of Units with Lead Based Paint

Year Built*	Units Occupied by Low Income Households	Percent with LBP	Units with LBP
<i>Owners</i>			
Before 1940	14	90%	13
1940-1959	89	80%	71
1960-1979	945	62%	586
Total	1,048	--	670
<i>Renters</i>			
Before 1940	16	90%	14
1940-1959	19	80%	15
1960-1979	538	62%	334
Total	573	--	363

Source: U.S. Census 2000; HUD estimates of LBP incidence by housing age.

The City takes a variety of actions to reduce lead-based paint hazards. Lead testing and abatement procedures are included in all rehabilitation activities and/or acquisition activities, where applicable. The City's rehabilitation programs comply with federal lead-based paint hazard regulations (24 CFR Part 35) by adhering to various standards including:

- Notification. The federal lead-based paint hazard brochure "Protect Your Family" is distributed to occupants, and owner-occupants of pre-1978 housing assisted by the City. A written notice to occupants is also prepared informing them of the results of lead hazard evaluation or reduction activities.
- Lead Hazard Evaluation. Prior to any rehabilitation work, the City contracts with an approved lead-based paint testing lab to conduct testing at the property. Upon completion, the lab sends a clearance document and full report of the property and their findings. Once a property receives clearance, the painting and rehabilitation can be completed.
- Lead Hazard Reduction. In the event that lead based paint is found, an abatement company is hired to abate the lead paint prior to any new painting.

13. Reduce Number of Poverty Level Families

Poverty is the condition of having insufficient resources or income. In its extreme form, poverty is a lack of basic human needs, such as adequate and healthy food, clothing, housing, water, and health services. The Census indicates that as of 2010, less than three percent of Yorba Linda's population was in poverty. Seniors experienced a higher rate of poverty (estimated at 4%) in Yorba Linda, as did female single parent households (estimated at 8%).

The City's ability to reduce or assist in reducing the number of households with incomes below the poverty line is dependent on its ability to increase the local employment base, and the ability to increase educational and job training opportunities.

The City's major objectives in reducing poverty within Yorba Linda are to enhance employment opportunities for all residents and promote self-sufficiency. This shall include creating job opportunities, additional tax revenue, new investment opportunities and overall community improvement for Yorba Linda residents by supporting existing businesses and bringing additional economic forces and investment to Yorba Linda.

Additionally, the City will also encourage the efforts of social service providers, government, housing providers/developers and the private sector to provide services and development programs that will enhance job opportunities for Yorba Linda residents, particularly low-income persons.

The City will also continue to support affordable housing including:

- Monitoring of affordability covenants on over 500 units of affordable rental housing;
- Funding support, as available, for development and acquisition/rehabilitation of additional housing affordable to low and moderate income households;
- The Housing Choice Program which provides vouchers for rental assistance to Yorba Linda residents; and
- Residential rehabilitation assistance to low-income owner occupants.

The City will also continue to support the Senior Nutrition program as a CDBG public service.

The City will fully comply with Section 3 of the Housing and Community Development Act, which helps foster local economic development and individual self-sufficiency. This set of regulations require that to the greatest extent feasible, the City will provide job training, employment, and contracting opportunities for low or very low-income residents in connection with housing and public construction projects.

14. Institutional Structure

Public Agencies

The City of Yorba Linda Community Development Department

As the recipient of CDBG funds, the City has delegated the Community Development Department to be the lead department responsible for the overall administration of HUD grants. In that regard, the Department will prepare the Consolidated Plan every three years, and draft the Annual Action Plan and CAPER, as well as all other reports required by federal rules and regulations. The Community Development Department will

continue to be the lead department for implementing housing programs, including residential rehabilitation, affordable housing development and acquisition/rehabilitation with affordability covenants, as well as economic development activities.

The City of Yorba Linda Department of Recreation and Community Services

The Department of Recreation and Community Services will continue to assist the City in carrying out its priorities with the Senior Nutrition program.

City of Yorba Linda Planning Division

The Planning Division performs functions that directly affect development and rehabilitation of housing. The Planning Division oversees the permit process, and regulates compliance with zoning and building codes.

Successor Agency to the Yorba Linda Redevelopment Agency

Under several Memoranda of Understanding with the City, the Redevelopment Agency administers RDA assisted new construction and acquisition/rehabilitation projects. As a result of the dissolution of the Redevelopment Agency, pursuant to AB X1 26, the Successor Agency will be responsible for administering these activities.

Orange County Housing Authority (OCHA)

The Orange County Housing Authority is essential in providing rental assistance to low income Yorba Linda residents to remain housed. OCHA administers the Housing Choice Rental Assistance Voucher Programs for most of Orange County.

Fair Housing Council of Orange County

The City also works with the Fair Housing Council of Orange County to provide fair housing services to the community, which includes discrimination investigations/resolutions and mediating landlords/tenant issues as well as providing foreclosure counseling. The City must affirm that they will further fair housing. Fair Housing is an important component of all housing activities.

Nonprofit Organizations

Affordable Housing Organizations

The City and the former Redevelopment Agency have principally worked in recent years with two non-profit affordable housing developers, Southern California Housing Development Company, now **National Community Renaissance (National CORE)** and **Orange Housing Development Corporation – OHDC**. The City assisted National CORE to acquire and rehabilitate the 67 unit Arbor Villas and subsequently the Redevelopment Agency provided funds as part of the layered financing that included tax credits for the acquisition and substantial rehabilitation of Arbor Villas. Similarly, the City provided funding to National CORE for the acquisition and rehabilitation of Linda Gardens (now Villa Plumosa), providing 75 units of affordable family housing.

In December 2009, the city transferred its ownership of 26 Agency-owned rental units in the 52 unit Evergreen Villas senior condominium complex to OHDC. Under the terms

of an Affordable Housing Agreement with the former Redevelopment Agency, OHDC is to acquire the remaining 26 units in Evergreen Villas as they become available for rehabilitation and conversion to lower income affordable rental housing with 55 year affordability covenants. Additionally, the former Redevelopment Agency amended the Affordable Housing Agreement with OHDC to acquire up to 48 multifamily ownership units, rehabilitate and convert the units to rental housing affordable to extremely low, very low, and low income households.

Other nonprofits active in providing affordable housing within Orange County include:

- Habitat for Humanity
- Jamboree Housing Corporation (JHC)
- LINC Community Development Corporation
- BRIDGE Housing

The **Orange County Affordable Housing Clearinghouse** is a regional nonprofit organization intended to work with local institutional lenders, nonprofit housing/shelter providers, and local government. The Clearinghouse can assist these groups in identifying housing needs and opportunities that might not otherwise be addressed. Loans are arranged by pooling funds from several banks, reducing the risk for each one. Technical assistance is also provided to nonprofits.

Nonprofits providing Community Services

The City of Yorba Linda will continue to support nonprofits that provide services and programs to the residents of Yorba Linda. Most of these nonprofit organizations are multi-jurisdictional that will continue to receive regional support and regional financial assistance.

Private Industry

For-Profit Developers and Builders

The City will continue to work with developers to encourage the development of affordable housing for low and moderate-income people.

The biggest obstacle faced by the City and its partners is lack of availability of sufficient financial resources to make a strong and sustainable impact within the region.

15. Analysis of Impediments (AI) to Fair Housing

Yorba Linda, along with a number of entitlement jurisdictions and all cities in the Urban County, created a consortium to develop a Regional Analysis of Impediments to Fair Housing Choice (AI) that addresses countywide issues as well as more localized issues for each participating city. The consortium contracted with the Fair Housing Council of Orange County (FHCOC) to complete the study. FHCOC provides fair housing services and tenant/landlord counseling services to residents throughout Orange County.

As part of the 2010-2015 Regional AI, each participating jurisdiction completed a 24 question survey of planning and zoning practices that may affect housing choices, particularly by disabled persons, and self-identified actions that would be taken to ameliorate and eliminate identified impediments. In an effort to address specific findings identified in the 2010 Regional AI, the City, in collaboration with the FHCOC, lending institutions, the real estate association, and other service agencies, has undertaken several strategies including:

- Education and outreach activities that include cooperating with the FHCOC, continue multi-faceted fair housing outreach to Yorba Linda residents, real estate professionals, apartment owners/managers, bankers and advocacy groups. Distribute multi-lingual fair housing literature, conducting foreclosure workshops, training, and public outreach events.
- Enforcement activities that continue to provide investigation and response to allegations of illegal housing discrimination through the FHCOC. For cases that cannot be conciliated, refer to the Department of Fair Housing and Employment (DFEH), U.S. Department of Housing and Urban Development (HUD), small claims court, or to a private attorney, as warranted.
- Monitoring lending, housing providers, and local real estate practices that entail, for example, monitoring the reasons for denial of home purchase, refinancing and home improvement loans. Contact local lenders in the region to provide additional education and outreach on the loan approval process, how to improve credit ratings, and available favorable home purchase tools. Assist lenders in marketing financial literacy programs at City Hall.
- Continue investigative testing and auditing local real estate markets that include steps to conduct audits to evaluate apparent patterns of discrimination in Yorba Linda, such as issues related to familial status, national origin and disability. To the extent such audits reveal significant discrimination, widely publicize the results to serve as a deterrent to other property owners and landlords.

Additionally, the FHCOC and other service agencies, will examine certain private sector impediments identified in the 2010-2015 Regional AI in the areas of housing discrimination; real estate advertising; blockbusting; denial of reasonable accommodation; hate crimes; and unfair lending. Under the terms of the annual contract, FHCOC is to provide these services, in addition to the strategies listed above:

- Process housing discrimination complaints filed by City residents.
- Compile an Annual Report on housing discrimination complaints filed with the FHCOC, the State Department of Fair Employment and Housing (DFEH) and HUD. The report will include housing discrimination complaints unique to the City as well as those of the entire County. The Annual Report will describe emerging trends within the City and County.
- Encourage the Orange County Register to publish a Fair Housing Notice in the "For Rent" classified section and to identify the FHCOC as an agency that can respond to fair housing questions.
- Encourage the Los Angeles Times and Orange County Register to publish a "No Pets" disclaimer that indicates rental housing owners must provide reasonable accommodations, including accommodations for service and companion animals for disabled persons.
- Periodically review "for rent" and "for sale" ads published in the print media and online.
- Provide information on the FHCOC website on the unlawful practice of blockbusting, and work with the State Dept of Real Estate to determine if any Orange County realtors have had their licenses suspended/revoked due to blockbusting.
- Provide information on the illegal practice of denying reasonable accommodation at fair housing seminars conducted by the Apartment Association of Orange County.
- Coordinate with the Orange County Human Rights Commission (OCHRC), the Center OC, and the Orange County Victims Assistance Partnership to monitor and alleviate hate crimes occurring at the City and regional level, and provide referrals to hate crime victims.
- Continue to monitor Home Mortgage Disclosure Act (HMDA) data annually using the 2008 HMDA analysis as a benchmark.
- Complete a HMDA analysis of the top 10 lenders in Orange County to compare and contrast loan denial rates.
- Conduct a follow-up analysis of loan denial rates at the neighborhood level to determine to what extent, if any, redlining may exist in Orange County. This follow-up will be completed when Census 2010 data is available on minority populations at the census tract level.
- Conduct outreach to cultural, ethnic and minority organizations to potentially increase interest in home purchases.
- Provide homebuyer education programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.
- Prepare a summary of the accomplishments each year and transmit to the City in August of each year for inclusion in the Consolidated Annual Performance and Evaluation Report (CAPER), which is published every September.

16. Affirmative Marketing

Section 3 of the Housing and Urban Development Act of 1968 and the implementing regulation at Section 3, Part 135 is intended to ensure that employment and other economic development opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing federal, State, and local laws and regulations, be directed to low and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low and very low income persons. To that end, the City's Section 3 Plan established goals and steps for all Section 3 covered projects and contracts for the City and covered contractors/developers in giving preference to local low and moderate-income persons or business concerns.

The City includes a set of forms in all bid packages for federally funded contracts. These forms consist of a listing of federal equal employment opportunity / affirmative action requirements, requirements for contracting with Small and Minority Firms, Women's Business Enterprise and Labor Surplus Area Firms, a certification regarding performance of previous contracts or subcontracts subject to the equal opportunity clause and the filing of required reports, and a certification regarding non-segregated facilities.

17. Citizen Participation

The City of Yorba Linda has adopted its own Citizen Participation Plan, which sets forth the general guidelines around which the Consolidated Plan is developed and outlines methods for citizens to guide and assist the City in formulating the Plan. The City provides for and encourages citizens to participate in the development of the Three Year Consolidated Plan, as well as the Annual Action Plan including amendments to the plan, the Annual Performance Reports and the proposed use of housing and community development funds. Residents, public agencies, and other interested parties, including those most affected, are given the opportunity to receive information, review and submit comments on proposed activities, including the amount of assistance the City anticipates receiving, and the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income persons.

In an effort to involve fully the public in the FY 2014-15 Annual Action Plan process, the City has taken a number of steps, including:

- On July 15, 2014, the City Council conducted a public hearing to discuss the views and opinions of Yorba Linda residents regarding the City's housing and community development needs. The hearing served as a means for eliciting the views and opinions of Yorba Linda residents regarding the City's community development and housing needs.

- The City published a public notice commencing a 30-day public review period during which interested persons were encouraged to review the City's FY 2014-2015 Annual Action Plan, which was available at the City Clerk's Office and on the City website.
- The City mailed notifications to local jurisdictions announcing the availability of the draft Annual Action Plan for review and comment. Notifications were sent to the cities of Anaheim, Brea and Placentia.