

INTRODUCTION/OVERVIEW

This attachment uses redline to identify revisions made to the General Plan Housing Element following the January 2022 public review period and until the publication of this agenda packet on February 4, 2022. These revisions are supplemental to the revisions identified in Attachment D.

Revisions have been made to the following:

1. Main General Plan Housing Element Document
2. Exhibit C (Housing Sites Inventory and Analysis)
3. Exhibit E (Public Participation Efforts)

An intentionally blank page D-12 has been added to Exhibit D (Housing Element Performance Assessment) for document formatting purposes.

Corrections have been made to the HCD Housing Element Sites Inventory Form, but only to reflect information included in the January 2022 draft of Exhibit C (Housing Sites Inventory and Analysis) as follows:

“Proposed Zoning” entries have been corrected as follows:

- “High Density Residential Overlay” has become “Residential High Density Overlay”
- “Medium Density Residential Overlay” has become “Residential Medium Density Overlay”
- “Medium-Low Density Residential Overlay” has become “Residential Medium-Low Density Overlay”
- “Low Density Residential Overlay” has become “Residential Low Density Overlay”

Site 5 entries have been corrected as follows:

- “Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)” has been marked “No.” The previous draft incorrectly marked “Yes.”

Site 15 entries have been corrected as follows:

- “Minimum Density Allowed” has been marked as “30” du/ac. The previous draft incorrectly marked “20” du/ac.

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- “Maximum Density Allowed” has been marked as “50” du/ac. The previous draft incorrectly marked “30” du/ac.

Attachment G incorporates the aforementioned corrections into the information required to complete the HCD Housing Element Sites Inventory Form. A revised electronic spreadsheet version of the HCD Housing Element Sites Inventory Form is available on the City’s website (www.cityoflagunawoods.org/projects). Interested parties may also contact the City Clerk’s Office at cityhall@cityoflagunawoods.org or (949) 639-0512 to obtain an emailed copy of the revised electronic spreadsheet.



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INTRODUCTION

California Government Code Section 65300 requires each city to adopt a comprehensive, long-term general plan to guide physical development. The Laguna Woods General Plan reflects the City of Laguna Woods' intentions about land use and its relationship to circulation, conservation, housing, noise, open space, and safety. This element identifies priority housing issues in Laguna Woods and sets forth goals and policies to achieve balance between the needs of the community and future development.

PURPOSE AND SCOPE

State law requires that general plans include a housing element, as follows:

California Government Code Section 65302(c): [The general plan must include] a housing element as provided in [California Government Code] Article 10.6 (commencing with Section 65580).

California Government Code Section 65583: The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile-homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

California Government Code Section 65583(a)(3) specifically requires that housing elements include “an inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality’s housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites.” For the purpose of that requirement, “housing needs for a designated income level” are quantified through the Regional Housing Needs Assessment (RHNA), which is discussed further in this element.

Additional statutory requirements related to the development and adoption



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of housing elements are contained in California Government Code sections 65580 through 65589.

This element addresses the following priority issues:

- Housing development
- Housing conservation
- Affirmatively furthering fair housing
- Housing element implementation

REGIONAL HOUSING NEEDS ASSESSMENT

The Regional Housing Needs Assessment (RHNA) is a process mandated by the State of California's housing laws to determine existing and future housing needs for each city and unincorporated area. Once housing needs are quantified through the RHNA process, cities and counties are required to take certain land use planning actions to allow for the construction of new housing units to meet those needs, including updating of housing elements.

The RHNA process is foundational to this element and, as such, the following information is provided to promote clarity and a common understanding of both the RHNA process and the City's associated obligations.

FREQUENTLY ASKED QUESTIONS

Is the RHNA process new?

No. The RHNA process began in 1969 and has occurred on regular "cycles" since then. From 1969 until the City's incorporation on March 24, 1999, the County of Orange was responsible for RHNA compliance and land use planning in Laguna Woods. Beginning on March 24, 1999, those responsibilities transferred locally to the City.

How does the RHNA process determine housing needs?

The California Department of Housing and Community Development (HCD) is responsible for determining housing needs for each region's "council of

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governments," which for Laguna Woods is the Southern California Association of Governments (SCAG). The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities.

HCD starts with demographic population information from the California Department of Finance and then applies a formula intended to increase housing supply and further other housing-related objectives established by the California State Legislature (see California Government Code Section 65584).

After receiving HCD's housing needs determination, SCAG allocates HCD's determination between individual cities and unincorporated areas. For the current 6th Cycle RHNA process (10/2021 - 10/2029 planning period), SCAG's allocation methodology considered factors including, but not limited to, anticipated household growth, job and transit accessibility, and social equity (the distribution of housing by income categories).

Table H-1 summarizes the City's current housing needs allocation.

Table H-1: 6th Cycle RHNA Housing Needs Allocation

Income Level	Number of Units
Very-low income	127
Low income	136
Moderate income	192
Above-moderate income	542
Total	997

What does the RHNA process require of the City?

The City is required to zone sufficient land to allow for the construction of new housing units to meet its housing needs allocation. Such land must be "suitable for residential development," which state law generally defines as including vacant land, residential land upon which additional housing units could be constructed, and nonresidential land that could be redeveloped to include new housing units (California Government Code Section 65583.2(a)). Such zoning must be "by right," which means that the City is required to allow new



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housing construction without requiring conditional use permits or other discretionary approvals that would constitute a “project” under the California Environmental Quality Act (CEQA).

How does the City’s General Plan Housing Element relate to the RHNA process?

State law requires that all cities update their general plan housing elements on either a five- or eight-year cycle (California Government Code Section 65588). The City is on an eight-year cycle with its most recent update due on October 15, 2021. Prior to adopting an updated General Plan Housing Element, the City is required to demonstrate to HCD that the update adequately plans for the City’s housing needs allocation and otherwise complies with applicable state law (California Government Code sections 65583 and 65585).

Does the City have the ability to zone private property?

Yes. State law requires the City to designate “the proposed general distribution and general location and extent of the uses of the land” within city limits, including both “public and private uses of land” (California Government Code Section 65302(a)). All public and private property in Laguna Woods, with the exception of public roads, is presently zoned and has been since the community was first constructed.

Does the RHNA process require the City to construct housing?

No. State law is explicit that the City is not required to “expend local revenues for the construction of housing, housing subsidies, or land acquisition” (California Government Code Section 65589(a)(1)).

Does the RHNA process require private property owners to construct housing?

No. While state law requires zoning sufficient to accommodate the City’s housing needs allocation, it does not require the use of that property to be limited to the construction of new housing units nor does it require property owners to construct housing or discontinue any existing non-housing uses. If a property owner does not wish to construct housing, zoning that allows such construction only presents an option for the future.

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Who makes the decision to construct housing?

Housing construction requires interested property owners and interested developers. No party is obligated to construct housing or discontinue any existing non-housing uses, regardless of how property is zoned.

Does the RHNA process allow the City to permit only senior housing?

No. State law specifies that the RHNA process is intended to address the “housing need of persons at all income levels” with goals including “increasing the housing supply and the mix of housing types, tenure, and affordability” (California Government Code Section 65584). While property owners may choose to construct age-restricted housing, state law does not allow the City to place such a restriction on properties for the purpose of accommodating the City's housing needs allocation.

Does the City receive credit for existing affordable housing units?

No. The RHNA process is focused on future housing needs. For the 6th Cycle RHNA process, credit was only provided for housing units approved, permitted, or built on or after June 30, 2021.

AFFIRMATIVELY FURTHERING FAIR HOUSING

California Assembly Bill 686 (2018) chaptered into law an obligation for cities and other public agencies to “administer [...] programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and take no action that is materially inconsistent with its obligation to affirmatively further fair housing.” California Government Code Section 8899.50(a)(1) defines “affirmatively furthering fair housing” as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining



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compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency's activities and programs relating to housing and community development."

GOALS, POLICY OBJECTIVES, AND PROGRAMS

This element is organized to be consistent with the other elements of the Laguna Woods General Plan. Goals and policy objectives provide declarative statements that set forth the City's approach to each of the priority issues.

Goals: General statements of desired outcomes.

Policy Objectives: Specific commitments to support decisions and actions consistent with a stated goal. Policy objectives provide guidance to the City Council, City advisory committees, and City staff when reviewing development applications and making other decisions that affect growth, conservation, and development.

As required by California Government Code Section 65583(c), this element also identifies programs that the City is undertaking or intends to undertake to implement the policy objectives and achieve the goals and policy objectives of the housing element during the planning period (10/2021 - 10/2029).

Priority Issue 1. HOUSING DEVELOPMENT.

Goal H-1. Enable the development of housing necessary to accommodate current and projected housing needs, including for lower-income households and other special needs populations.

Policy Objective H-1.1. Make sites available to accommodate current and projected housing needs for groups at all income levels, in accordance with California Government Code Section 65583(c)(1).

Program H-1.1.1. Rezone the 17 potential housing sites identified in the Housing Sites Inventory and Analysis (Exhibit C) to accommodate the City's housing needs allocation (Table H-1).

Primary Responsibility: Planning & Environmental Services Department

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Anticipated Timeline: Calendar Year 2022
 Anticipated Funding: California Senate Bill 2 (2017) Planning Grant
 Quantified Objectives: See Table G in Exhibit C

Note: The rezoning process will include the creation of four new overlay zoning districts and the adoption of minimum density and development standards for each. Specific commitments in the rezoning process include, but are not limited to, (1) complying with applicable provisions of California Government Code Section 65583.2 et al., (12) permitting housing projects by right, as required by state law, (23) permitting owner-occupied and rental multifamily uses by right for housing projects in which 20% or more of the housing units are affordable for lower-income households, (34) establishing densities for each potential housing site as specified in Table G in Exhibit C, and (45) allowing the development of housing projects as standalone uses on each potential housing site.

Policy Objective H-1.2. Assist in the development of adequate housing to meet the needs of extremely low, very low, low-, and moderate-income households.

Program H-1.2.1. Continue to maintain website information regarding fees, exactions, and affordability requirements imposed by the City that are applicable to housing development projects, in accordance with California Government Code Section 65940.1.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Ongoing

Anticipated Funding: General Fund

Quantified Objectives: Conforming Website Information

Program H-1.2.12. Prepare and maintain a webpage with information related to the 17 potential housing sites identified in the Housing Sites Inventory and Analysis (Exhibit C), including a Geographic Information System (GIS) map layer with geospatial information.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2022

Anticipated Funding: General Fund



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Quantified Objectives: Conforming Webpage and GIS Map Layer

Program H-1.2.23. Conduct a market study and then amend the existing inclusionary housing ordinance to modify the minimum percentages of new housing units that must be deed-restricted for extremely low, very low, and low-income households, as feasible and advantageous to promote the development of affordable housing.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2022

Anticipated Funding: General Fund

Quantified Objectives: Market Study and Conforming Ordinance

Note: In accordance with HCD's "Housing Element Site Inventory Guidebook Government Code Section 65583.2" memorandum dated June 10, 2020, amendment of the ordinance will follow consultation with both for-profit and nonprofit developers to determine an appropriate mix of incomes that make development feasible in Laguna Woods. The City will also consult with housing advocates. When applied to rental housing, the ordinance will include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site.

Program H-1.2.34. Adopt an ordinance creating an expedited and fee-reduced lot consolidation process for consolidations involving any one or more of the 17 potential housing sites identified in the Housing Sites Inventory and Analysis (Exhibit C) for the purpose of developing housing projects in which at least 5% of housing units are affordable for extremely low income households; at least 10% of housing units are affordable for very low or low-income households; or, at least 50% of housing units are affordable for moderate-income households. To be eligible, the housing units shall be subject to an affordability covenant for at least 55 years.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2022

Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance

Program H-1.2.45. Adopt an ordinance waiving or reducing City building permit fees for housing projects in which at least 5% of housing units are

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affordable for extremely low income households; at least 10% of housing units are affordable for very low or low-income households; or, at least 50% of housing units are affordable for moderate-income households. To be eligible, the housing units shall be subject to an affordability covenant for at least 55 years.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2022

Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance

Program H-1.2.56. Amend various, existing housing-related provisions of the Laguna Woods Municipal Code to promote regulatory clarity.

- Section 13.23.030(a)(2)c. Delete “private living space.”

Note: The language identified for deletion is duplicative within Laguna Woods Municipal Code Chapter 13.23 and is not intended to constrain the development of emergency shelters in a manner that would conflict with Assembly Bill 139 (2019).

- Section TBD. Explicitly identify that low-barrier navigation centers are permitted by right in zoning districts where multifamily and mixed uses are permitted, including nonresidential zoning districts permitting multifamily uses pursuant to California Government Code Section 65660.

Note: The City is required to comply with California Government Code Section 65660 irrespective of whether explicit language is adopted as part of the Laguna Woods Municipal Code.

- Section TBD. Explicitly identify that zoning is consistent with the Employee Housing Act (California Health and Safety Code Section 17000 et seq.), specifically sections 17021.5 and 17021.6.

Note: The City is required to comply with the Employee Housing Act irrespective of whether explicit language is adopted as part of the Laguna Woods Municipal Code.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2022

Anticipated Funding: General Fund



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Quantified Objectives: Conforming Ordinance

~~Program H-1.2.6. Continue to maintain website information regarding fees, exactions, and affordability requirements imposed by the City that are applicable to housing development projects, in accordance with California Government Code Section 65940.1.~~

~~Primary Responsibility: Planning & Environmental Services Department~~

~~Anticipated Timeline: Ongoing~~

~~Anticipated Funding: General Fund~~

~~Quantified Objectives: Conforming Website Information-Program H-1.2.7.
Formalize written procedures for the application and processing of housing projects eligible for streamlined, ministerial approval pursuant to California Government Code Section 65913.4.~~

~~Primary Responsibility: Planning & Environmental Services Department~~

~~Anticipated Timeline: Calendar Year 2022~~

~~Anticipated Funding: General Fund~~

~~Quantified Objectives: Conforming Policy~~

~~Note: The City is required to comply with California Government Code Section 65913.4 irrespective of whether procedures are formalized in writing.~~

~~Program H-1.2.8. Investigate potential incentives for the development of housing projects with features that exceed the minimum requirements set forth in the California Building Energy Efficiency Standards. If feasible and economical, adopt such incentives.~~

~~Primary Responsibility: Planning & Environmental Services Department~~

~~Anticipated Timeline: Within Six Months of Each Triennial California Building Standards Code Effective Date for Investigation~~

~~Anticipated Funding: General Fund~~

~~Quantified Objectives: Report Regarding Investigation;
Adopted Incentives (if applicable)~~

Policy Objective H-1.3. Provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities.

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Program H-1.3.1. Continue to consider transitional housing a residential use of property, subject only to those restrictions that apply to other residential dwellings of the same type in the same zoning district.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Ongoing

Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance

Program H-1.3.2. Continue to consider supportive housing a residential use of property, subject only to those restrictions that apply to other residential dwellings of the same type in the same zoning district.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Ongoing

Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance

Program H-1.3.3. Continue to ~~allow-permit~~ supportive housing ~~, as defined by California Government Code Section 65650, as a use permitted~~ by right in all zoning districts where multifamily and mixed uses are permitted, ~~as provided in California Government Code Article 11 (commencing with Section 65650).~~

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Ongoing

Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance

Program H-1.3.4. Amend various, existing housing-related provisions of the Laguna Woods Municipal Code to conform to state law.

- Section 13.26.070. Remove the conditional use permit requirement for community care facilities serving seven to 12 persons located in areas where residential uses are permitted.



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- Section 13.06.010(d)(395). Revise the zoning definition of “family” to address inconsistencies with state law related to the occupants of community care facilities.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2022

Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance

Policy Objective H-1.4. Incentivize and promote the creation of accessory dwelling units that can be offered at affordable rent for very low, low-, or moderate-income households.

Program H-1.4.1. Continue to maintain an ordinance that conforms to the provisions of California Government Code Section 65852.2 related to accessory dwelling units and junior accessory dwelling units, including amending the ordinance as necessary.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Ongoing

Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance

Program H-1.4.2. Prepare and maintain a webpage with information related to Laguna Woods Municipal Code requirements, processing procedures, and incentives pertaining to the development of accessory dwelling units and junior accessory dwelling units. Prepare and maintain a flyer with related information.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2023

Anticipated Funding: General Fund

Quantified Objectives: Conforming Webpage and Flyer

Program H-1.4.3. Designate and maintain a “specialist” to assist with the processing and approval of applications to develop accessory dwelling units and junior accessory dwelling units.

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Primary Responsibility: Planning & Environmental Services Department
 Anticipated Timeline: Calendar Year 2022
 Anticipated Funding: General Fund
 Quantified Objectives: Designated Specialist

Policy Objective H-1.5. Make sites available to accommodate emergency housing needs for homeless persons and families, in accordance with California Government Code Section 65583(a)(7).

Program H-1.5.1. Continue to maintain an ordinance that conforms to the provisions of California Government Code Section 65583~~(a)(4)~~ related to emergency shelters, including amending the ordinance as necessary.

Primary Responsibility: Planning & Environmental Services Department
 Anticipated Timeline: Ongoing
 Anticipated Funding: General Fund
 Quantified Objectives: Conforming Ordinance

Priority Issue 2. HOUSING CONSERVATION.

Goal H-2. Support the conservation of housing necessary to accommodate current and projected housing needs, including for lower-income households and other special needs populations.

Policy Objective H-2.1. Conserve and improve the condition of the existing affordable housing stock.

Program H-2.1.1. Prepare and maintain a webpage with information on home improvement-related financial assistance opportunities available to extremely low, very low, and low-income households. Train City staff to make referrals using the webpage.

Primary Responsibility: Planning & Environmental Services Department
 Anticipated Timeline: Calendar Year 2023



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Anticipated Funding: General Fund

Quantified Objectives: Conforming Webpage and Evidence of Training

Program H-2.1.2. Investigate potential incentives for property owners to extend existing affordability covenants beyond the planned expiration date. If feasible and economical, adopt such incentives.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2024 for Investigation

Anticipated Funding: General Fund

Quantified Objectives: Report Regarding Investigation;
Adopted Incentives (if applicable)

Policy Objective H-2.2. Promote accessible and accommodating housing options for persons with special needs.

Program H-2.2.1. Prepare and maintain a webpage with information on home improvement-related financial assistance opportunities available to persons with special needs. Train City staff to make referrals using the webpage.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2023

Anticipated Funding: General Fund

Quantified Objectives: Conforming Webpage and Evidence of Training

Program H-2.2.2. Adopt an ordinance waiving or reducing City building permit fees for improvements to the home of a person at least 60 years of age with a qualifying disability that are made to accommodate that disability, as provided for by California Health and Safety Code Section 17951.7. Consider including provisions allowing for similar building permit fee waivers or reductions for improvements to the home of a person with a qualifying disability that are made to accommodate that disability, regardless of age. Prepare and maintain a flyer with related information.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2022

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Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance and Flyer

Program H-2.2.3. Provide opportunities for reimbursements, grants, or other forms of financial assistance to support home improvements that increase accessibility or functionality for persons with special needs.

Primary Responsibility: Engineering & Infrastructure Services Department

Anticipated Timeline: Calendar Year 2022 (as funding permits)

Anticipated Funding: State Permanent Local Housing Allocation monies

Quantified Objectives: Financial Assistance Opportunities

Policy Objective H-2.3. Promote housing conservation and revitalization.

Program H-2.3.1. Formalize a proactive code enforcement program that focuses on housing-related rehabilitation needs, results in repairs, and seeks to mitigate potential cost, displacement, and relocation impacts on residents.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Calendar Year 2025

Anticipated Funding: General Fund

Quantified Objectives: Conforming Code Enforcement Policies

Priority Issue 3. AFFIRMATIVELY FURTHERING FAIR HOUSING.

Goal H-3. Administer housing and community development programs and activities in a manner to affirmatively further fair housing.

Policy Objective H-3.1. Enhance access to housing.

Program H-3.1.1. Improve pedestrian accessibility on sidewalks, curb ramps, crosswalks, and other public property connecting housing with transit stops, public buildings, and businesses.



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Primary Responsibility: Engineering & Infrastructure Services Department
 Anticipated Timeline: Ongoing (as funding permits)
 Anticipated Funding: Community Development Block Grants (CDBG)
 Quantified Objectives: Ongoing Effort

Program H-3.1.2. Pursue partnerships and seek funding to provide Laguna Woods-based housing mobility counseling services. If feasible and economical, implement such services.

Primary Responsibility: Planning & Environmental Services Department
 Anticipated Timeline: Biennial Process to Identify Interested and Qualified Service Providers; Beginning in Calendar Year 2023
 Anticipated Funding: General Fund
 Quantified Objectives: Service Provider Identification Processes; Implemented Services (if applicable)

Policy Objective H-3.2. Protect existing residents from displacement.

Program H-3.2.1. Prepare and maintain a webpage with information on housing mediation, foreclosure assistance, and multilingual tenant legal counseling services. Train City staff to make referrals using the webpage.

Primary Responsibility: Planning & Environmental Services Department
 Anticipated Timeline: Calendar Year 2023
 Anticipated Funding: General Fund
 Quantified Objectives: Conforming Webpage and Evidence of Training

Program H-3.2.2. Pursue partnerships and seek funding to provide Laguna Woods-based housing mediation, foreclosure assistance, and multilingual tenant legal counseling services. If feasible and economical, implement such services.

Primary Responsibility: Planning & Environmental Services Department
 Anticipated Timeline: Biennial Process to Identify Interested and Qualified Service Providers; Beginning in Calendar Year 2023
 Anticipated Funding: General Fund
 Quantified Objectives: Service Provider Identification Processes;

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Implemented Services (if applicable)

Program H-3.2.3. Investigate potential hazard mitigation measures that would reduce or eliminate the long-term risk of residential displacement as a result of future disasters. If feasible and economical, implement such hazard mitigation measures.

Primary Responsibility: Public Safety Services Department

Anticipated Timeline: Calendar Year 2024 for Investigation

Anticipated Funding: General Fund

Quantified Objectives: Report Regarding Investigation;
Implemented Measures (if applicable)

Note: The investigation called for in this program is a necessary precursor to the potential identification of implementable measures and associated timelines. The report regarding investigation will provide greater specificity including, as applicable, clear commitments and milestones, and measurable outcomes.

Note: Programs H-1.2.~~2~~3 (pertaining to inclusionary housing), H-2.2.2 (pertaining to fee waivers or reductions for disability-related improvements), and H-2.2.3 (pertaining to financial assistance for home accessibility improvements) relate to affirmatively furthering fair housing by promoting housing supply, choices, and affordability, but are included under other priority issues in this element due to the manner in which this element is structured. Similarly, Program H-2.1.2 (pertaining to potential incentives for extended affordability covenants) relates to affirmatively furthering fair housing by protecting existing residents from displacement and Program H-2.3.1 (pertaining to proactive code enforcement) relates to affirmatively furthering fair housing by using place-based strategies to encourage community conservation and revitalization.

Priority Issue 4. HOUSING ELEMENT IMPLEMENTATION.

Goal H-4. Provide for analysis related to housing element implementation.

Policy Objective H-4.1. Conduct annual monitoring of the housing element.

Program H-4.1.1. Host an annual public forum to:



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- Provide public education related to the purpose and scope of the housing element, as well as progress in its implementation; and
- Solicit public input on the implementation of the housing element, existing and projected housing needs for all economic segments, and resources and constraints relevant to meeting housing needs.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Annually; Beginning in Calendar Year 2023

Anticipated Funding: General Fund

Quantified Objectives: Public Forums

Program H-4.1.2. Prepare and submit an annual report to the City Council, California Governor's Office of Planning and Research, and HCD with:

- The information required by California Government Code Section 65400(a)(2), in the form and manner specified; and
- A statement regarding the general plan's internal consistency and, if necessary, the identification of corrective actions that will be taken to resolve any internal inconsistency.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Annually; Prior to April 1

Anticipated Funding: General Fund

Quantified Objectives: Conforming Reports and Public Meetings

Note: Pursuant to California Government Code Section 65400(a)(2)(B)(ii), the annual report information required by California Government Code Section 65400(a)(2) shall be considered at an annual public meeting before the City Council where members of the public are allowed to provide oral testimony and written comments. This program requires certain other information to be included in the annual report, which will also then be subject to consideration at the annual public meeting.

Policy Objective H-4.2. Coordinate implementation of this housing element with the water and sewer agency.

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Program H-4.2.1. Deliver each adopted housing element (including amendments thereto) to the El Toro Water District, in accordance with California Government Code Section 65589.7(a).

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Immediately Following Each Adoption

Anticipated Funding: General Fund

Quantified Objectives: Conforming Deliveries

Note: California Government Code Section 65589.7(a) generally requires the El Toro Water District to grant a priority for the provision of water and sewer services to housing projects that include housing units affordable to lower-income households.

EXHIBITS

The following exhibits are attached hereto and incorporated by reference:

- Exhibit A – Housing Needs Assessment
- Exhibit B – Constraints Analysis
- Exhibit C – Housing Sites Inventory and Analysis
- Exhibit D – Housing Element Performance Assessment
- Exhibit E – Public Participation Efforts

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EXHIBIT C

HOUSING SITES INVENTORY AND ANALYSIS

CITY OF LAGUNA WOODS

LSA

~~January~~ February 2022

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HOUSING SITES INVENTORY AND ANALYSIS

CITY OF LAGUNA WOODS

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LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
AFFH	Affirmatively Furthering Fair Housing
APN	Assessor's Parcel Number
CDC	Centers for Disease Control and Prevention
CF-P	Community Facilities—Private
City	City of Laguna Woods
ETWD	El Toro Water District
FHEO	Fair Housing Enforcement and Outreach
Golden Rain Foundation	Golden Rain Foundation of Laguna Woods
HCD	California Department of Housing and Community Development
HPI	Healthy Places Index
HUD	United States Department of Housing and Urban Development
LIHTC	Low Income Housing Tax Credit
MFI	median family income
OCTA	Orange County Transportation Authority
PA	Professional and Administrative Office
PHASC	Public Health Alliance of Southern California
RHNA	Regional Housing Needs Assessment
SB	Senate Bill
SCAG	Southern California Association of Governments
SCE	Southern California Edison
SVI	Social Vulnerability Index
SVUSD	Saddleback Valley Unified School District
TCAC	Tax Credit Allocation Committee
UWMP	Urban Water Management Plan



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1.0 INTRODUCTION

State Housing Element law requires local governments to adequately plan to meet their existing and projected housing needs, including their share of the Regional Housing Needs Assessment (RHNA) allocation. Government Code Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development, which is used to identify sites that can be developed for housing within the planning period. This report has been prepared to satisfy Government Code Section 65583(a)(3).

2.0 STATE REGULATIONS

State law recognizes the vital role local governments play in the availability, adequacy, and affordability of housing. Every city and county in California is required to adopt a long-range General Plan to guide its physical development; the Housing Element is one of the seven mandated elements of the General Plan. State Housing Element law mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for (and do not unduly constrain) housing production. Housing Element statutes also require the California Department of Housing and Community Development (HCD) to review local housing elements for compliance with state law and to report its findings to the local government.

State Housing Element law requires that each local government develop local housing programs to meet its “fair share” of existing and future housing needs for all income groups. The Southern California Association of Governments (SCAG) is responsible for developing and assigning these regional needs, via the RHNA process, to Southern California jurisdictions including the City.

Government Code Section 65583(a)(3) requires that local governments prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to those sites. This parcel-level inventory of sites with near-term residential development potential has been prepared in support of the City’s efforts to update its Housing Element.

The City’s fair share for the planning period between October 2021 and October 2029 was established by SCAG at 997 units divided into four income groups as shown in Table A. That housing needs allocation was based on projected household growth and the resulting need for construction of additional housing units allocated over an 8-year planning period (2021–2029).

Table A: City of Laguna Woods Housing Needs Allocation (2021–2029)

Income Level	Percent of Area MFI	No. of Units
Very Low	0–50%	127
Low	51–80%	136
Moderate	81–120%	192
Above Moderate	>120%	542
Total		997

Source: SCAG 6th Cycle Final RHNA Allocation Plan (approved by HCD on March 22, 2021).

HCD = California Department of Housing and Community Development

MFI = median family income

RHNA = Regional Housing Needs Assessment

SCAG = Southern California Association of Governments

It should be noted that the City’s housing needs allocation for the 2021–2019 planning period (997 units) is substantially higher than its allocation during the previous planning period (2 units).

2.1 ASSEMBLY BILL 1397

Pursuant to Assembly Bill (AB) 1397, cities must determine if more than 50 percent of the lower-income RHNA would be accommodated on nonvacant sites. When a city relies on nonvacant sites to accommodate 50 percent or more of its housing need for lower-income households, the methodology used to determine additional development potential must demonstrate that the existing use identified does not constitute an impediment to additional residential development during the period covered by the Housing Element. An existing use is presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period (Government Code Section 65583.2(g)(2)).

2.2 ASSEMBLY BILL 686

Pursuant to AB 686, for Housing Elements due on or after January 1, 2021, sites must be identified throughout the community in a manner that affirmatively furthers fair housing opportunities (Government Code Section 65583(c)(10)). According to Government Code Section 8899.50(a)(1), affirmatively furthering fair housing means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity; replacing segregated living patterns with truly integrated and balanced living patterns; transforming racially and ethnically concentrated areas of poverty into areas of opportunity; and fostering and maintaining compliance with civil rights and fair housing laws. For purposes of this Housing Sites Inventory and Analysis, this means that the sites identified to accommodate the lower-income need must not be concentrated in low-resourced areas (areas that lack access to high-performing schools, are not close to jobs, and/or are disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Instead, the sites identified to accommodate the lower-income need must be distributed throughout the community in a manner that affirmatively furthers fair housing.



3.0 OVERVIEW OF POTENTIAL HOUSING SITES

The City has identified 17 potential sites that appear to be viable for near-term housing development that would help the City meet its RHNA requirements. Table B provides a brief description of each site and its corresponding Assessor's Parcel Numbers (APNs), along with a description of the existing uses on each site, the surrounding land uses, the parcel size, and the existing General Plan land use and zoning designations on each site. The 17 sites are distributed throughout the community as shown in Figure 1, Housing Sites Key Map.

Table B: Site Descriptions

Site	Description/APN	Existing Uses/Background Information	Surrounding Uses	Vacant?	Parcel Size	Current General Plan Land Use Designation	Current Zoning
1	Town Centre Vacant Lot (APN 616-012-29)	<ul style="list-style-type: none"> Undeveloped. Site slopes downward from north to south, with most of the developable area on this parcel being 30 to 50 feet above El Toro Road. 	North: El Toro Water District facility—water well property (one-story structures and water tanks) East: Laguna Hills Animal Hospital and Laguna Woods Self Storage (one- and two-story structures) South: Laguna Woods Village water detention basin—vacant property West: Medical office building within Town Centre (three-story structure)	Yes	1.8 ac	Commercial	Community Commercial
2	Pacific Hills Calvary Chapel Parking Lot (APN 621-131-38)	Currently developed as a surface parking lot for the adjacent Pacific Hills Calvary Chapel in neighboring Aliso Viejo.	North: vacant land, Laguna Country United Methodist Church (one-story structures) East: Laguna Country United Methodist Church, Pacific Hills Calvary Chapel (in Aliso Viejo) (all one-story structures) South: vacant land, Pacific Hills Calvary Chapel (in Aliso Viejo) (all one-story structures) West: vacant land	No	0.696 ac	Commercial	Professional & Administrative Office

Table B: Site Descriptions

Site	Description/APN	Existing Uses/Background Information	Surrounding Uses	Vacant?	Parcel Size	Current General Plan Land Use Designation	Current Zoning
3	Rossmoor Electric (APN 621-131-21)	Currently developed as a commercial use with a small number of office and storage uses.	North: grocery and commercial (one- and two-story structures) East: Saddleback Golf Cars (one-story structures) South: Laguna Woods Village community garden center West: Equestrian Center (one- and two-story structures)	No	1.232 ac	Commercial	Community Commercial
4	Saddleback Golf Cars (APN 621-131-26)	Currently developed as a commercial use with neighborhood electric vehicle and golf cart sales and repair.	North: grocery and commercial (one- and two-story structures) East: vacant land South: vacant land West: Rossmoor Electric (one-story structures)	No	1.235 ac	Commercial	Community Commercial
5	Laguna Woods Self Storage (APN 616-012-19)	Currently developed as a commercial use with approximately eight single story structures used for individual storage.	North: Laguna Woods Village golf course East: Animal Hospital and commercial center (one-and-two-story structures) South: water storage West: City Center Park	No	5.249 ac	Commercial	Community Commercial
6	Animal Hospital (APN 616-012-03)	Currently developed as a commercial use with an animal hospital.	North: Laguna Woods Self Storage (one-story structures) East: gas station (one-and-two-story structures) South: Equestrian Center (one- and two-story structures) West: vacant land	No	0.76 ac	Commercial	Community Commercial

Table B: Site Descriptions

Site	Description/APN	Existing Uses/Background Information	Surrounding Uses	Vacant?	Parcel Size	Current General Plan Land Use Designation	Current Zoning
7	PS Business Park (excludes Jack in the Box) (APN 616-021-30)	Currently developed as a commercial use with a self-storage facility and small shopping center.	North: open space (in Lake Forest) East: Laguna Woods Village golf course South: Laguna Woods Village golf course West: fast-food restaurant (one-story structure)	No	2.867 ac	Commercial	Community Commercial
8	Smart Parke (APN 621-211-09)	Currently developed as a commercial use with a pet boarding facility.	North: grocery and commercial (one-and-two story structures) East: Home Depot center (one-and two-story structures) South: Laguna Woods Village golf course West: The Regency Apartment Homes (one-to-three-story structures)	No	2.373 ac	Commercial	Community Commercial
9	McCormick & Son Mortuary (APN 621-091-016)	Currently developed as a commercial use with a mortuary facility.	North: medical offices (three-story structures) East: single family residences (one- and two-story structures) South: residential (four-story structures) West: multifamily residential (in Aliso Viejo) (four-story structures)	No	1.411 ac	Commercial	Community Commercial

Table B: Site Descriptions

Site	Description/APN	Existing Uses/Background Information	Surrounding Uses	Vacant?	Parcel Size	Current General Plan Land Use Designation	Current Zoning
10	Lutheran Church of the Cross (APN 616-041-01)	Currently developed as a church.	North: Laguna Woods Village residences (three-story structures) East: Laguna Woods Village residences (one- and two-story structures) South: Saint Nicholas Catholic Church (one- and two-story structures) West: Laguna Woods Village Golf Course	No	3.028 ac	Community Facilities	Community Facilities—Private
11	Geneva Presbyterian Church (APNs 616-191-05 & 616-191-06)	Both parcels are currently developed as a church.	North: Laguna Woods Village residences (one-story structures) East: Calle Sonora/office building within Town Centre (three-story structure) South: Whispering Fountains Apartments and residences (in Aliso Viejo) (one-, two-, and three-story structures) West: Laguna Woods Village residences (one-story structures)	No	3.955 ac ¹	Community Facilities (both parcels)	Community Facilities—Private (both parcels)
12	Saint Nicholas Catholic Church (APN 621-121-11)	Currently developed as a church.	North: Lutheran Church of the Cross (one- and two-story structures) East: Laguna Woods Village residences (one- and two-story structures) South: Laguna Woods Village residences (one-story structures) West: Willow Tree Center and Laguna Woods Village residences (one- and two-story structures)	No	4.596 ac	Community Facilities	Community Facilities—Private

Table B: Site Descriptions

Site	Description/APN	Existing Uses/Background Information	Surrounding Uses	Vacant?	Parcel Size	Current General Plan Land Use Designation	Current Zoning
13	Temple Judea (APN 621-121-18)	Currently developed as a temple.	North: Laguna Country United Methodist Church and Laguna Woods Village residences (one-story structures) East: Laguna Woods Village residences (one-story structures) South: Laguna Woods Village residences and various churches (in Aliso Viejo) (one-story structures) West: Laguna Country United Methodist Church and various churches (in Aliso Viejo) (one-story structures)	No	1.757 ac	Community Facilities	Community Facilities—Private
14	Laguna Country United Methodist Church (APN 621-121-23)	Currently developed as a church.	North: Willow Tree Center and Laguna Woods Village residences (one-story structures) East: Temple Judea and Laguna Woods Village residences (one-story structures) South: Temple Judea and various churches (in Aliso Viejo) (one-story structures) West: parking lot for Pacific Hills Calvary Chapel, Laguna Woods Village vacant land, Willow Tree Center, Laguna Woods Village residences (one-story structures)	No	3.899 ac	Community Facilities	Community Facilities—Private

Table B: Site Descriptions

Site	Description/APN	Existing Uses/Background Information	Surrounding Uses	Vacant?	Parcel Size	Current General Plan Land Use Designation	Current Zoning
15	Medical Building in Town Centre (APN 616-012-24)	Currently developed as a commercial use with office uses.	North: Town Center (three-story structure) East: vacant land South: Home Depot shopping center and Laguna Woods Village water detention basin (one-story structures) West: Town Centre (one- and three-story structures)	No	2.69 ac	Commercial	Professional & Administrative Office
16	Willow Tree Center East (APN 621-121-30)	Currently developed as a commercial use with retail, a restaurant, and an adult day services facility.	North: Laguna Woods Village Golf Course East: medical buildings (four-story structures) South: Residential Community (one- and two-story structures) West: Community Commercial (Town Centre) (one- and two-story structures)	No	3.095 ac	Commercial	Community Commercial
17	Helm Center (APN 621-091-15)	Currently developed as a commercial use with office uses.	North: Laguna Woods Village residences (one- and two-story structures) East: Laguna Woods Village residences (one- and two-story structures) South: McCormick & Son Mortuary (one-story structures) West: The Wellington (in Aliso Viejo) (four-story structures)	No	0.65 ac	Commercial	Professional & Administrative Office

¹ APN 616-191-05 is 0.5 acre and APN 616-191-06 is 3.455 acres. The total acreage of both parcels is 3.955.

ac = acre(s)

APN = Assessor's Parcel Number

County = County of Orange

Figure 1: Housing Sites Key Map



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4.0 METHODOLOGY USED TO IDENTIFY SITES

Given the predominantly built-out nature of Laguna Woods, there is very little undeveloped land that is able to accommodate new development. The majority of Laguna Woods is comprised of private communities that are restricted to adults aged 55 and older. Most of the limited amount of vacant land that exists within Laguna Woods consists of publicly owned open space properties that are subject to conservation easements or deed restrictions that prohibit housing development.

Properties presently designated as open space were excluded from consideration when the presence of deed restrictions preclude potential future housing development. The Laguna Laurel property at the western end of Santa Maria Avenue is subject to a conservation easement that expressly prohibits the construction of housing. Woods End Wilderness Preserve is subject to a deed restriction that prohibits use inconsistent with “nonvehicular public access into the Laguna Coast Wilderness Park and natural resource protection and restoration.” Woods End Wilderness Preserve is also leased to the County of Orange for inclusion in the Laguna Coast Wilderness Park through February 28, 2047.

City-owned sites were screened for potential inclusion in this analysis; however, due to the City’s extremely limited property ownership, none were included. The City Hall/Public Library site was excluded due to the impending construction of a new library building and expanded outdoor gathering and activity spaces. Both the City Centre Park and Woods End Wilderness Preserve sites are subject to state grant-related deed restrictions. The property at Santa Vittoria Drive/San Remo Drive is 0.32 acre, which is presumed inadequate to accommodate lower income housing per HCD.

Approximately 2.7 square miles of Laguna Woods’ overall 3.3 square miles is occupied by Laguna Woods Village (formerly known as Leisure World), a private gated community for people aged 55 and older. Figure 1, Housing Sites Key Map, shows the portions of Laguna Woods that are within Laguna Woods Village. Over 15,000 residents live in the 12,736 units within Laguna Woods Village, which include condominiums, cooperatives (“co-ops”), and single-family homes. While there are several properties that are perceived as vacant within Laguna Woods Village, none of those properties meet HCD’s definition of a vacant property as set forth in the “Housing Element Site Inventory Guidebook Government Code Section 65583.2” published June 10, 2020~~“Housing Element Site Inventory Guidebook Government Code Section 65583.2” memorandum, dated June 10, 2020,~~ and the production of new housing within Laguna Woods Village faces several challenges. There are income requirements and age restrictions for residents to become members of and live within the community, and the ability to build housing on, or unilaterally sell/lease, any land held in trust by the Golden Rain Foundation for the benefit of the residents of Laguna Woods Village is restricted by applicable governing documents. Each of the perceived vacant sites within Laguna Woods Village was also redesignated/rezoned in 2015 as open space at the request of the property owner (Golden Rain Foundation); prior to that action, those sites were designated/zoned for residential and commercial use. The City has discussed its new housing needs allocation and the Housing Element update process with Laguna Woods Village management staff (Village Management Services, Inc.) and has received no indication that the Golden Rain Foundation or any other Laguna Woods Village governing board is interested in pursuing new housing development. Due to a lack of evidence

indicating a likelihood of redevelopment, properties located within, or owned by parties exclusively affiliated with Laguna Woods Village, were excluded from consideration.

Sites were included in this analysis because they met one or more of the following criteria:

- Sites where interest in housing development has been previously expressed were included. In 2014, the property owner's agent expressed interest in redeveloping the Willow Tree Center East property (Site 16). In 2017, the property owner and a housing developer expressed interest in the Laguna Country United Methodist Church property (Site 14).
- Based, in part, on previous interest in the Laguna Country United Methodist Church site (Site 14), parcel sizes, proximity to public transit, mission compatibility¹, and membership-related trends, other sites presently used as places of worship were included.
- Based, in part, on previous interest in the Willow Tree Center East site, parcel sizes, and proximity to public transit, other commercial sites were included. An emphasis was placed on identifying commercial sites with:
 - Frequent or long-term vacancies
 - As evidenced by real estate marketing.
 - Indicates that demand for commercial uses at that location is low, signaling a potential for redevelopment.
 - Less established tenants
 - According to the United States Bureau of Labor Statistics, approximately 20 percent of small businesses fail in the first year, 50 percent fail by the end of the fifth year, and 66 percent fail by the end of the tenth year.²
 - Indicates that the property may become available during the RHNA cycle.
 - Single tenants
 - Redeveloping such properties has fewer lease implications.
 - Viable adjacent sites
 - Presents an opportunity for lot consolidation, potentially making redevelopment at an economic scale more viable.

The list of nonvacant properties that met the criteria described above were further screened to exclude any properties that host businesses that provide essential goods or services to the

¹ California State Senator Scott Wiener. 2020. "Senator Wiener Introduces Housing Legislation to Allow Churches and Other Charitable Institutions to Build Affordable Housing on Their Property." Website: <https://sd11.senate.ca.gov/news/20200306-senator-wiener-introduces-housing-legislation-allow-churches-and-other-charitable#:~:text=Churches%20and%20other%20religious%20and,in%20order%20to%20do%20so.%E2%80%9D> (accessed July 11, 2021).

² United States Bureau of Labor Statistics. 2020. Survival of private sector establishments by opening year. March. Website: https://www.bls.gov/bdm/us_age_naics_00_table7.txt (accessed July 1, 2021).

community and are, therefore, not likely to vacate their current locations. Such businesses included grocery stores, banks, and pharmacies.

The properties upon which Home Depot is located were also removed from further consideration, consistent with HCD's "Housing Element Site Inventory Guidebook Government Code Section 65583.2" published June 10, 2020 ~~HCD's Site Inventory Guidebook (May 2020)~~ that references an "active Home Depot" as an example of an existing use that is "unlikely to be available for residential development within the planning period."

The analysis in this report focuses on the suitability of housing development on each site by examining site conditions and various development constraints (e.g., environmental hazards or inadequate infrastructure). The report also identifies those sites that are most likely to redevelop at density levels that can facilitate affordable housing. The goal of this analysis is to confirm that the 17 potential housing sites are able to accommodate the City's housing needs allocation.

This analysis also takes into consideration whether each site is vacant or nonvacant, as defined by HCD, and whether existing uses on the nonvacant sites would serve as an impediment to additional housing development during the Housing Element planning period.

5.0 ENVIRONMENTAL CONSTRAINTS AND ADEQUATE INFRASTRUCTURE

Government Code Section 65583.2(b)(4) requires that the City provide a general description of any environmental constraints to the development of housing within its jurisdiction. Government Code Section 65583.2(b)(5) requires that the City provide a description of existing or planned water, sewer, and other dry utilities supply, including the availability and access to distribution facilities.

5.1 ENVIRONMENTAL CONSTRAINTS

Table C summarizes any environmental site constraints that affect each of the 17 housing sites, with an emphasis on grading, slope hazards, access issues, and surrounding uses. As described in Table C, it appears that vehicular access to each of the 17 housing sites is viable. Table C also indicates that many of the sites have no environmental constraints. With respect to the sites with potential environmental constraints, there are feasible engineering and design solutions that are likely to reduce the environmental impacts associated with these constraints to less than significant levels. Although the total development capacity of several of the sites (Sites 8, 11, 12, 13, 14, 16, and 17) would be constrained by slope hazards or the need to be sensitive to neighboring residents, none of the sites have physical impediments that would render them undevelopable.

5.2 INFRASTRUCTURE CONSTRAINTS

Laguna Woods is a predominantly built-out urban community that has adequate infrastructure to provide water, sewer, electricity, natural gas, and telecommunications services to its residents. As shown in Figure 1, all 17 of the potential housing sites are adjacent to either El Toro Road or Moulton Parkway and are either already developed or surrounded by existing development.

Water service is provided to Laguna Woods, including to the existing uses on each of the nonvacant sites (Sites 2–17) and the existing commercial land uses adjacent to the vacant site (Site 1), by the El Toro Water District (ETWD). The existing water mains along El Toro Road and Moulton Parkway could sufficiently support housing development on all of the sites. As an urban water supplier, ETWD is required to prepare an Urban Water Management Plan (UWMP) every 5 years. The UWMP supports ETWD's long-term resource planning to ensure that adequate water supplies are available to meet existing and future water needs. ETWD is currently in the process of preparing an update to its UWMP, which is anticipated to evaluate the reliability of its water supplies through at least 2040.

The City will ~~be working~~work with ETWD to ensure that planned land uses, including future housing envisioned under the City's RHNA allocation, are included in future UWMPs so that sufficient water supplies are available. A related program has been included in the Housing Element.

Sewer service is provided to Laguna Woods by ETWD. Because sewer service is currently provided to the existing uses on each of the nonvacant sites (Sites 2–17) and the existing commercial land uses adjacent to the vacant site (Site 1), the existing sewer facilities could sufficiently support housing development on all of the sites.

Table C: Environmental and Site Constraints

Site	Name	Description of Constraint
1	Town Centre Vacant Lot	<ul style="list-style-type: none"> Site slopes downward from north to south toward El Toro Road. Heavy grading, with a substantial amount of soil export, would be required to accommodate new housing on this site; in addition, it is likely that tiebacks and/or retaining walls would be required to stabilize the site. Vehicle access through the Town Centre project to the west appears viable. A small portion of the site is located in a landslide hazard zone. Inclusion in such a zone does not preclude housing development.
2	Pacific Hills Calvary Chapel Parking Lot	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the northeast. Vehicle access to Moulton Parkway appears viable via the existing driveway on the adjacent property. No environmental constraints affect this site.
3	Rossmoor Electric	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the east. Vehicle access to Moulton Parkway appears viable via the existing driveway. No environmental constraints affect this site.
4	Saddleback Golf Cars	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the east. Vehicle access to Moulton Parkway appears viable via the existing driveway. No environmental constraints affect this site.
5	Laguna Woods Self Storage	<ul style="list-style-type: none"> Site is sloped to the northeast and south; site appears to drain toward the southeast. Vehicle access to Moulton Parkway appears viable via the existing driveway. A small portion of the site is located in a landslide hazard zone. Inclusion in such a zone does not preclude housing development.
6	Animal Hospital	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the south. Vehicle access to El Toro Road appears viable via the existing driveway. No environmental constraints affect this site.
7	PS Business Park (excludes Jack in the Box)	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the north. Vehicle access to Moulton Parkway appears viable via the existing driveway. No environmental constraints affect this site.
8	Smart Parke	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the south. Vehicle access to El Toro Road appears viable via the existing driveway. A portion of the site is located in a landslide hazard zone. Inclusion in such a zone does not preclude housing development. The western portion of the site was affected by a landslide in 2004 when the slope below Calle Sonora failed due to excessive soil saturation, causing significant private property damage.
9	McCormick & Son Mortuary	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the north. Vehicle access to Moulton Parkway appears viable via the existing driveway. No environmental constraints affect this site.
10	Lutheran Church of the Cross	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the southeast. Vehicle access to El Toro Road appears viable via the existing driveways on the site. No environmental constraints affect this site.
11	Geneva Presbyterian Church	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the southeast. The northern and western portions of the site are adjacent to residential uses; therefore, any housing development on those portions of the site will need to be sensitive to neighboring residents. Vehicle access to El Toro Road and Calle Sonora appears viable via the existing driveways on the site.

Table C: Environmental and Site Constraints

Site	Name	Description of Constraint
12	Saint Nicholas Catholic Church	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the northwest. The southern portion of the site is adjacent to residential uses; therefore, any housing development on that portion of the site will need to be sensitive to neighboring residents. Vehicle access to El Toro Road appears viable via the existing driveways on the site.
13	Temple Judea	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the northeast. The northern and eastern portions of the site are adjacent to residential uses; therefore, any housing development on those portions of the site will need to be sensitive to neighboring residents. Vehicle access to Moulton Parkway appears viable via the existing driveway on the site, which is shared with the owner of an adjacent site.
14	Laguna Country United Methodist Church	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the northeast. The northern and eastern portions of the site are adjacent to residential uses; therefore, any housing development on those portions of the site will need to be sensitive to neighboring residents. Vehicle access to Moulton Parkway appears viable via the existing driveway on the site, which is shared with the owner of an adjacent site.
15	Medical Building in Town Centre	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the southeast. Vehicle access to El Toro Road appears viable via the existing driveway west of the site. No environmental constraints affect this site.
16	Willow Tree Center East	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the southeast. Vehicle access to El Toro Road appears viable via the existing driveway west of the site. The southern portion of the site is near residential communities; therefore, any housing development on that portion of the site will need to be sensitive to neighboring residents.
17	Helm Center	<ul style="list-style-type: none"> Site is relatively flat and appears to drain toward the southeast. The eastern portion of the site is adjacent to residential uses; therefore, any housing development on that portion of the site will need to be sensitive to neighboring residents. Vehicle access to Moulton Parkway appears viable via the existing driveways on the site.

Southern California Edison (SCE) provides electrical service to Laguna Woods. Because electrical service is currently provided to the existing uses on each of the nonvacant sites (Sites 2–17) and the existing commercial land uses adjacent to the vacant site (Site 1), the existing electrical facilities could sufficiently support housing development on all of the sites.

The Southern California Gas Company provides natural gas service to Laguna Woods and each of the nonvacant sites (Sites 2–17) via existing gas mains in Ridge Route Drive, Moulton Parkway, and El Toro Road. Gas lines could be extended from El Toro Road into the vacant site (Site 1) to sufficiently support housing development.

Telecommunication services including landline and cell phone service, television, and internet are available throughout Laguna Woods. These services could be provided to all of the sites to sufficiently support housing development.

5.3 GENERAL LAND USE CONSIDERATIONS

The City will include a rezoning program in its Housing Element to apply an appropriate residential overlay zoning district to each of the 17 potential housing sites. Such overlay zoning districts would allow new housing units to be developed on the nonvacant sites while also allowing the existing uses to continue operating. City staff has identified four potential overlay zoning districts, which are described in Table D below. A full General Plan consistency review will be completed when the City implements the Housing Element rezoning program; however, a subsequent update of the General Plan Land Use Element will be required to establish the new overlay zoning districts. To remain consistent with the General Plan Circulation Element, a traffic impact analysis will be required.

Table D: Potential Overlay Zoning Districts

Overlay Zone	Density Range	Notes
Residential High Density	30–50 du/ac	<ul style="list-style-type: none"> • Able to accommodate the development of lower-income units, consistent with HCD's standard threshold
Residential Medium Density	20–30 du/ac	<ul style="list-style-type: none"> • Able to accommodate the development of moderate-income units
Residential Medium-Low Density	15–20 du/ac	<ul style="list-style-type: none"> • Appropriate for sites adjacent to existing lower-density residential uses • Able to accommodate the development of moderate-income units
Residential Low Density	8–10 du/ac	<ul style="list-style-type: none"> • Appropriate for sites adjacent to existing single-story residential uses • Able to accommodate the development of moderate-income units

du/ac = dwelling unit(s) per acre

HCD = Department of Housing and Community Development

5.4 ACCESS TO COMMUNITY RESOURCES

Although locations vary, in general, each of the 17 potential housing sites appears to enjoy good access to community resources based on the following factors:

- Good access to grocery stores and other retail outlets (e.g., ALDI Food Market, Mother's Market & Kitchen, and Stater Bros.), which may also serve as employment centers
- Good transit access (each site is within a 0.25-mile walk of an Orange County Transportation Authority [OCTA] bus stop.)
- Close to employment centers (e.g., Laguna Hills Mall and shopping centers)
- Close to a medical facility (Saddleback Medical Center)

- Good access to quality schools (Based on the Saddleback Valley Unified School District [SVUSD] School Locator map, each of the sites would be assigned to the following schools, which are described below.)
 - **San Joaquin Elementary School** (Kindergarten–Grade 6) has the following:¹
 - A 70.3 percent enrollment rate comprising socioeconomically disadvantaged students
 - An overall “Exemplary” rating of the school’s state of repair
 - A full cohort of administrative and teaching staff members, which provides adequate student-teacher ratios
 - **Los Alisos Intermediate School** (Grades 7 and 8) has the following :²
 - A 57 percent enrollment rate comprising socioeconomically disadvantaged students
 - An overall “Good” rating of the school’s state of repair
 - A full cohort of administrative and teaching staff members, which provides adequate student-teacher ratios
 - **Laguna Hills High School** (Grades 9–12) has the following :³
 - A 38.9 percent enrollment rate comprising socioeconomically disadvantaged students
 - An overall “Exemplary” rating of the school’s state of repair
 - A full cohort of administrative and teaching staff members, which provides adequate student-teacher ratios
- SVUSD’s website states that families may request interdistrict transfers based on changes in childcare needs (Kindergarten–Grade 6 only), parent employment, and student enrollment in specialized programs. Proper documentation must be provided to SVUSD in order for an interdistrict transfer to be considered.

5.5 ENERGY CONSERVATION OPPORTUNITIES

Planning to maximize energy efficiency and the incorporation of energy conservation and green building features can contribute to reduced housing costs for residents in Laguna Woods, in addition to promoting sustainable community design and reduced dependence on vehicles. Such planning and development standards can also significantly contribute to reducing greenhouse gases. The City’s Municipal Code references recently adopted regulations that are intended to conserve energy and provide opportunities for residents to live in decent, safe, and affordable housing.

¹ Saddleback Valley Unified School District. 2020. San Joaquin Elementary School 2019–20 School Accountability Report Card. Website: <https://www.doc-tracking.com/screenshots/Serve/844/2020/English/SanJoaquinElementarySchool.pdf> (accessed July 1, 2021).

² Saddleback Valley Unified School District. 2020. Los Alisos Intermediate School 2019–20 School Accountability Report Card. Website: <https://www.doc-tracking.com/screenshots/Serve/844/2020/English/LosAlisosIntermediateSchool.pdf> (accessed July 1, 2021).

³ Saddleback Valley Unified School District. 2020. Laguna Hills High School 2019–20 School Accountability Report Card. Website: <https://www.doc-tracking.com/screenshots/Serve/844/2020/English/LagunaHillsHighSchool.pdf> (accessed July 1, 2021).

Existing efforts to promote energy conservation were identified and reviewed to determine whether feasible and economical opportunities exist for the City to add or enhance efforts.

5.5.1 City Efforts

5.5.1.1 Laguna Woods Municipal Code

California Green Building Standards Code. The California Green Building Standards Code, 2019 Edition (California Code of Regulations, Title 24, Part 11; CALGreen),¹ was adopted and incorporated by reference as the City's Green Building Standards Code. CALGreen regulates the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated.

The scope of CALGreen extends to include all new buildings, this includes newly constructed residential structures, including apartment buildings, condominiums, one and two-story dwellings, homeless shelters, and other types of dwellings containing sleeping accommodations; therefore, it applies to affordable housing units.

California Energy Code. The California Energy Code, 2019 Edition (California Code of Regulations, Title 24, Part 6),² was adopted and incorporated by reference as the City's Energy Code. The Energy Code regulates the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures.

The Energy Code promotes efficient building energy use to protect people and the environment. Once rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. This is expected to reduce greenhouse gas emissions in California by 700,000 metric tons over three years, equivalent to taking 115,000 fossil fuel cars off the road.³

Construction and Demolition Materials Management. Chapter 4.24, Construction and Demolition Materials Management, of the City's Municipal Code increases the amount of construction and demolition waste diverted from landfills by requiring minimum levels of reuse or recycling of waste generated by certain types of projects.

Water Efficient Landscapes. Chapter 10.03, Water Efficient Landscapes, of the City's Municipal Code encourages efficient and conservation-oriented use of water in new and rehabilitated landscapes by limiting the amount of water able to be applied and requiring compliance with El Toro Water District regulations.

¹ City of Laguna Woods. Municipal Code. Website: https://library.municode.com/ca/laguna_woods/codes/code_of_ordinances?nodeId=TIT10BUCO_CH10.24CAGRBUSTCO (accessed September 16, 2021).

² City of Laguna Woods. Municipal Code. Website: https://library.municode.com/ca/laguna_woods/codes/code_of_ordinances?nodeId=TIT10BUCO_CH10.28CAENCO (accessed September 16, 2021).

³ 2019 Building Energy Efficiency Standards FAQs. *The California Energy Commission - Efficiency Division*. Website: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf (accessed September 17, 2021).

In considering opportunities to promote energy conservation, the City's role in administering the California Building Standards Code positions it well to incentivize improvements that exceed the minimum requirements set forth in the California Green Building Standards Code and California Energy Code (collectively referred to as the California Building Energy Efficiency Standards). A related program has been included in the Housing Element.

5.5.1.2 City of Laguna Woods General Plan Conservation Element

The General Plan Conservation Element addresses emergent issues and existing conditions in order to form a comprehensive approach to resource conservation. This element presents existing conditions relative to natural resource conservation within Laguna Woods and is organized to address the following eight priority issues: air resources; biological resources; cultural resources; energy resources; land resources; water resources; greenhouse gas emissions; and waste and recycling.

Implementation actions associated with the following General Plan Conservation Element policy objectives would provide opportunities for energy conservation in residential development:

- CO-4.1. Maintain energy reliability and affordability through conservation, efficiency, and independence.
- CO-4.2. Demonstrate sustainable energy resource leadership.
- CO-6.2. Maintain water reliability and affordability through conservation, efficiency, and independence.
- CO-6.3. Demonstrate sustainable water resource leadership.
- CO-8.1. Control sources of greenhouse gas emissions.
- CO-8.2. Demonstrate climate change leadership.
- CO-9.1. Adopt and enforce regulations promoting waste and recycling goals.
- CO-9.2. Expand opportunities for recycling and reuse of waste.

5.5.2 Other Resources

5.5.2.1 Southern California Edison Programs

For households requiring assistance with the payment of routine energy bills, Southern California Edison offers the following programs:

- California Alternate Rates for Energy (CARE) reduces energy bills for eligible customers by about 30 percent.
- Family Electric Rate Assistance (FERA) reduces electric bills for qualified households by 18 percent.

5.5.2.2 Foundation of Laguna Woods Village Payment Assistance

The Foundation of Laguna Woods Village is a nonprofit corporation that raises and distributes monies to assist residents of the private gated community of Laguna Woods Village. The Foundation of Laguna Woods Village offers temporary financial assistance with the payment of utility and energy bills.

6.0 FAIR HOUSING ISSUES

HCD updated its guidance for implementing Affirmatively Furthering Fair Housing (AFFH) in April 2021. The updated guidance was published to assist public agencies and local governments with meeting their AB 686 requirements. In April 2021, HCD also released an interactive AFFH Data Viewer, which provides several map layers with data related to key AFFH factors including the following: Fair Housing Enforcement Outreach Capacity, Community Segregation and Integration, Disparities in Access to Opportunities, Disproportionate Housing Needs & Displacement Risks, and Racially and Ethnically Concentrated Areas of Poverty and Affluence. Per HCD's AFFH implementation guidance, the 17 potential housing sites were analyzed for any potential patterns and trends of disparate housing needs and disproportionate access to opportunities. Using those criteria, housing sites were then evaluated on several map layers available from the AFFH Data Viewer to confirm that they would comply with AFFH policy. Figures 2 through 6, which are described in further detail below, show the locations of the potential housing sites and their proximity to the different classifications provided in the AFFH Data Viewer.

6.1 POVERTY STATUS

Figure 2, Poverty Status, identifies the percentage of the population in each Laguna Woods census tract whose income in the past 12 months was below the poverty level, based on the 2015–2019 American Community Survey estimates. Figure 2 also identifies the locations of the 17 potential housing sites. As shown in Figure 2, between 10 and 20 percent of the population in the portions of Laguna Woods east of Moulton Parkway and west of Moulton Parkway between El Toro Road and Santa Maria Avenue are living below the poverty level.

Of the 17 sites, four (Sites 2, 3, 4, and 8) are located in areas of Laguna Woods in which less than 10 percent of the population's income is below the poverty level, and 13 (Sites 1, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, and 17) are located in areas in which between 10 and 20 percent of the population's income is below the poverty level.

While no areas in Laguna Woods are within a census tract in which a majority of the population's income is below the poverty level, this analysis suggests that the development of new affordable housing on Sites 1, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, and 17 would be more desirable in order to affirmatively further fair housing. This is due to their slightly higher percentages of poverty levels relative to the Laguna Woods average.

6.2 DIVERSITY INDEX

Figure 3, Diversity Index, identifies the diversity levels in each of the Laguna Woods census tracts based on Esri's 2018 Diversity Index, which analyzes United States Census Population Estimates data. Figure 3 also identifies the locations of the 17 potential housing sites. The Diversity Index ranges from 0 (no diversity) to 100 (complete diversity). Esri's definition of diversity is two-dimensional and combines racial diversity with ethnic diversity. The measure evaluates the likelihood that two persons, chosen at random from the same area, belong to different races or ethnic groups. If an area's entire population belongs to one race group and one ethnic group, then an area has zero diversity.

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Figure 2: Poverty Status

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Figure 3: Diversity Index

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In theory, the Diversity Index ranges from 0 (no diversity) to 100 (complete diversity). The Diversity Index is a continuum from 0 to 100, where an area's Diversity Index tends toward 100 when the population is more evenly divided across race and ethnic groups. If an area's entire population is divided evenly into two race groups and one ethnic group, then the Diversity Index equals 50. As more race groups are evenly represented in the population, the Diversity Index increases. As shown in Figure 3, the Diversity Index varies substantially among the Laguna Woods census tracts.

Of the 17 sites, five (Sites 1, 5, 6, 11, and 15) are located in areas of Laguna Woods that score lower on the Diversity Index. Seven of the sites (Sites 7, 9, 10, 12, 13, 14, and 16) are located in areas that score higher on the Diversity Index, with scores that are less than or equal to the 40–55th percentile. Four of the sites (Sites 2, 3, 4, and 8) are located in areas that scored within the 70–85th percentile.

This analysis suggests that Sites 2, 3, 4, 7, 8, 9, 10, 12, 13, 14, and 16 would be stronger candidates for developing affordable housing due to their higher Diversity Index scores. Developing affordable housing at these sites would comply with AFFH policies and affirmatively further fair housing.

6.3 HEALTHY PLACES

Figure 4, Healthy Places Index, shows the Laguna Woods census tracts and their scores on the Public Health Alliance of Southern California (PHASC) 2021 Healthy Places Index (HPI). The HPI was developed to assist in exploring local factors that predict life expectancy and provides overall scores and detailed data on specific policy action areas that shape health. Higher HPI scores represent communities where economic, education, transportation, social, neighborhood, clean environment, housing, and healthcare access indicators suggest that conditions that are conducive to healthy living are present. Figure 4 also identifies the locations of the 17 potential housing sites. As shown in Figure 4, the HPI varies substantially among the Laguna Woods census tracts.

Of the 17 sites, six of the sites (Sites 9, 12, 13, 14, 16, and 17) are located in areas that scored between the 20th and 40th percentile on the HPI. Five of the sites (Sites 1, 5, 6, 11, and 15) are located in areas that scored between the 40th and 60th percentile, followed by Sites 7 and 8, which are located in areas that scored between the 60th and 80th percentile on the HPI.

Based on this analysis, Sites 1, 5, 6, 7, 8, 11, and 15 are preferable for affordable housing development due to their higher HPI scores, which would affirmatively further fair housing.

6.4 SOCIAL VULNERABILITY

Figure 5, Social Vulnerability Index, identifies the census tracts throughout Laguna Woods and their scores on the Centers for Disease Control and Prevention (CDC) 2018 Social Vulnerability Index (SVI). “Social vulnerability” refers to the potential negative effects on communities caused by external stresses on human health. Such stresses can include natural or human-caused disasters, or disease outbreaks. The SVI uses 15 different United States Census variables to help local officials identify communities that may need support before, during, or after disasters. Figure 5 also identifies the locations of the 17 potential housing sites.

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Figure 4: Healthy Places Index

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Figure 5: Social Vulnerability Index

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There is one census tract within Laguna Woods that is identified as having a “higher vulnerability” per AFFH data. None of the 17 sites are located in that census tract. All of the sites are located in census tracts with a “moderate vulnerability” based on the SVI.

Despite the fact that the potential housing sites are located in areas subject to moderate levels of social vulnerability, they remain good candidates for affordable housing to affirmatively further fair housing.

6.5 TAX CREDIT ALLOCATION COMMITTEE OPPORTUNITY AREAS

HCD and the California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further fair housing goals (as defined by HCD). The California Fair Housing Task Force has compiled data to identify resource levels across the state to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9 percent Low Income Housing Tax Credits (LIHTCs). The data reflect composite scores of four different domains made up of a set of indicators. Table E shows the full list of these domains and indicators.

Table E: Domains and Lists of Indicators for Opportunity Maps

Domain	Indicator
Economic	<ul style="list-style-type: none"> • Poverty • Adult education • Employment • Job proximity • Median home value
Environmental	<ul style="list-style-type: none"> • CalEnviroScreen 3.0 pollution indicators and values
Education	<ul style="list-style-type: none"> • Math proficiency • Reading proficiency • High school graduation rates • Student poverty rates
Poverty and Racial Segregation	<ul style="list-style-type: none"> • Poverty: tracts with at least 30% of population under federal poverty line • Racial segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Source: California Fair Housing Task Force. 2020. Methodology for the 2020 TCAC/HCD Opportunity Maps. June.

Figure 6, TCAC Opportunity Areas, shows the Laguna Woods census tracts and their categorization based on their composite scores. Areas with higher composite scores are those areas that have the highest number of resources. Areas with lower composite scores have a comparatively lower number of resources. Figure 6 also identifies the locations of the 17 potential housing sites. As shown in Figure 6, the composite scores vary substantially among the Laguna Woods census tracts.

Of the 17 sites, 13 of the sites (Sites 1, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, and 17) are located in “Low Resource” areas. Four of the sites (Sites 2, 3, 4, and 8) are located in portions of Laguna Woods that are categorized as being “Moderate Resource—Rapidly Changing” areas.

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Figure 6: TCAC Opportunity Areas

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Based on this analysis, Sites 2, 3, 4, and 8 are preferable for affordable housing development due to their locations in higher resource areas relative to what is available in Laguna Woods, which would affirmatively further fair housing.

6.6 REGIONAL OPPORTUNITY INDEX

The UC Davis Center for Regional Change and Rabobank partnered to develop the Regional Opportunity Index (ROI) tool, which is intended to help communities understand local social and economic opportunities. The ROI tool incorporates both “People” and “Place” components, integrating economic, infrastructure, environmental, and social indicators into a comprehensive assessment of the factors driving opportunity.

The People component of the ROI is a relative measure of *people's* assets in education, the economy, housing, mobility/transportation, health/environment, and civic life. According to the ROI, Laguna Woods ranks moderate to high in the People component.

The Place component of the ROI is a relative measure of an *area's* assets in education, the economy, housing, mobility/transportation, health/environment, and civic life. According to the ROI, most areas in Laguna Woods rank in the highest level while the westernmost portion of Laguna Woods ranks in the low level of opportunity.

In general, the ROI for Laguna Woods is relatively high when compared against the rest of Orange County. The lowest access to opportunity is concentrated in the northwestern portion of Orange County, while the highest access to opportunity is concentrated in the coastal and southern areas of Orange County, which is where Laguna Woods is located.

6.7 DISABILITY, FAMILY STATUS, AND INCOME

Table F provides data compiled by the U.S. Census Bureau related to disability, poverty status, median household income, and household type for Orange County, Laguna Woods, and the eight census tracts that are partially or entirely within Laguna Woods.

Table F indicates that seven of the eight census tracts in Laguna Woods have a higher percentage of their population with a disability than Orange County. Overall, 27.3 percent of Laguna Woods' population has some form of disability, a figure that is higher than each of the individual census tracts within Laguna Woods. Census Tract 626.21 reports the lowest population percentage with a disability (7.2 percent). All 17 of the potential housing sites are located in census tracts with a higher percentage of disabled residents than Orange County.

As described in Table F, 11.5 percent of Laguna Woods' residents are living below the federal poverty threshold, which is slightly higher than Orange County overall (10.9 percent). Of the eight census tracts in Laguna Woods, five have a higher percentage of residents living below the poverty threshold than Orange County. Seven of the 17 potential housing sites are located in census tracts with a higher percentage of residents living below the poverty threshold than Orange County.

Table F: Disability, Family Status, and Income

Jurisdiction	Population with Disability (%) ³	Population Below Poverty (%) ²	Median Household Income ¹	Married-Couple Family ⁴	Male Householder ⁴	Female Householder ⁴	Nonfamily Household ⁴
Orange County	8.5	10.9	\$90,234	569,260	55,032	119,719	293,481
Laguna Woods	27.3	11.5	\$44,020	3,590	83	309	7,021
Census Tract 626.21	7.2	7.7	\$111,425	2,355	297	361	1,610
Census Tract 626.22	22.6	13.7	\$44,119	951	0	47	1,537
Census Tract 626.25	14.1	12.4	\$45,214	831	46	131	952
Census Tract 626.41	13.8	3.3	\$88,986	1,034	5	147	838
Census Tract 626.46	25.4	10.6	\$41,875	762	48	0	1,555
Census Tract 626.47	16.9	15.7	\$54,327	543	143	217	1,448
Census Tract 626.48	26.4	12.9	\$45,000	470	8	84	1,300
Census Tract 626.49	24.5	11.1	\$60,254	711	28	33	1,094

¹ American Community Survey 2019 5-Year Estimates. Table S1901.

² American Community Survey 2019 5-Year Estimates. Table S1701.

³ American Community Survey 2019 5-Year Estimates. Table S1810.

⁴ American Community Survey 2019 5-Year Estimates. Table S1101.

Table F also shows that Laguna Woods has a substantially lower median household income (\$44,020) than Orange County (\$90,234). Of the eight census tracts in Laguna Woods, only Census Tract 626.21 has a higher median household income (\$111,425) than Orange County. All 17 of the potential housing sites are located in census tracts with a lower median household income than Orange County.

Additionally, six of the eight census tracts in Laguna Woods, and Laguna Woods as a whole, have a higher number of nonfamily households than family, male householder, or female householder households, which reflects Laguna Woods' character as being home to a large senior population, many of whom do not live in family households. By comparison, Orange County has a much larger number of married-couple families than nonfamily, male householder, or female householder families. In total, 11 of the 17 potential housing sites are located in census tracts with a larger number of nonfamily households than married-couple family households.

6.8 AGE AND INCOME RESTRICTIONS

As described in Section 4.0 above, the majority of Laguna Woods is comprised of private communities that are both income-restricted and age-restricted to adults aged 55 and older. Consequently, most of the City's housing stock is subject to income and age restrictions, which has impeded housing choices for lower-income and younger residents interested in relocating to Laguna Woods.

6.9 CONCLUDING ANALYSIS

Each of the 17 potential housing sites were also analyzed against three additional AFFH data layer maps: (1) areas that are defined by either the TCAC or HCD Opportunity Maps as being an area of "High Segregation and Poverty" or by the United States Department of Housing and Urban Development (HUD) as a "Racially or Ethnically Concentrated Area of Poverty"; (2) areas identified as

State Bill (SB) 535-defined “Disadvantaged Communities”; and (3) locations of cases throughout Laguna Woods that were filed with HUD’s Fair Housing Enforcement and Outreach (FHEO) branch in 2020.

Analysis of these data sets showed that Laguna Woods does not contain any areas defined by either the TCAC or HCD Opportunity Maps as being an area of High Segregation and Poverty or by HUD as a Racially or Ethnically Concentrated Area of Poverty. Although HCD’s guidance for implementing AFFH states that affordable housing should aim to be developed in those areas in order to further fair housing, no such areas exist within Laguna Woods. Furthermore, Laguna Woods does not contain any SB 535-defined Disadvantaged Communities, and, as such, none of Laguna Woods’ potential housing sites are located in a SB 535-defined Disadvantaged Community. Additionally, the entirety of Laguna Woods is located in an area that had less than .01 percent of complaints filed with FHEO in 2020, which means that few to no housing discrimination complaints have been filed in Laguna Woods and that housing discrimination is not currently seen as a major issue within Laguna Woods.

Using the various data available from HCD’s AFFH Data Viewer, each of the 17 sites is situated within a census tract that is desirable from an AFFH standpoint for at least one of the categories described above. Therefore, each of the sites would affirmatively further fair housing opportunities.

Further, all 17 of the potential housing sites are located in census tracts with a higher percentage of disabled residents and a lower median household income than Orange County. In addition, seven of the 17 potential housing sites are located in census tracts with a higher percentage of residents living below the poverty threshold than Orange County, and 11 of the 17 potential housing sites are located in census tracts with a larger number of nonfamily households than married-couple family households. This indicates that the proposed housing sites are not concentrated in an area of elevated poverty, which suggests that the development of new affordable housing units on these sites would facilitate the integration of lower-income households into the community in a way that would affirmatively further fair housing opportunities.

7.0 REALISTIC DEVELOPMENT CAPACITY

Government Code Section 65583.2(c) requires that the City demonstrate that the projected residential development capacity of the sites can realistically be achieved. The number of estimated units should be adjusted, as necessary, based on land use controls and site improvement requirements; the realistic development capacity for the site; typical densities of existing or approved residential developments at a similar affordability level in the surrounding area; and the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.

The following assumptions were incorporated into the realistic development capacity estimates:

- None of the sites are constrained by the availability or accessibility of sufficient water, sewer, and dry utilities. Therefore, no adjustments were made.
- The net developable area on each site was adjusted to 95 percent of the parcel area to reflect the need to construct on-site improvements, including sidewalks and utility easements, and other land use controls.
- The developable area on Site 8 was adjusted to approximately 60 percent of the parcel due to slope hazard constraints on the western third of the site.
- The development capacity on three of the five sites that are currently developed with places of worship (Sites 10–12) and Sites 9 and 17 was limited to 15–20 units per acre to reflect ~~the fact that~~ the proximity of those sites ~~are adjacent~~ to existing, adjacent, lower-density residential uses.
- The development capacity on one of the five sites that are currently developed with places of worship (Site 13) and Site 16 was limited to 8–10 units per acre to reflect the proximity of those sites to existing, adjacent, lower-density residential uses.
- The development capacity at each of the sites was adjusted to 95 percent of the maximum density, and the number of units was rounded down to the nearest whole number, to reflect that not every housing project is built out to maximum density.

Table G estimates the number of new housing units that can realistically be built on each of the 17 potential housing sites based on the assumptions provided above. As shown in Table G, the total future housing construction potential on the 17 sites, based on realistic capacities, is 1,196 units. This includes an excess, or overzoning, of 199 units, or approximately 20 percent more than the 997 units included in the City's housing needs allocation. ~~Overzoning helps to ensure that sufficient adequate sites will remain available at all times to meet the remaining unmet housing needs for each income category, per Government Code Section 65863 ("No Net Loss Law").~~

Overzoning helps to (1) ensure that sufficient adequate sites will remain available at all times to meet the remaining unmet housing needs for each income category, per Government Code Section 65863 ("No Net Loss Law"), and (2) compensate for urban land left vacant due to ownership and development constraints, per HCD's "Housing Element Site Inventory Guidebook Government Code



Section 65583.2” published June 10, 2020. HCD also notes that “a sufficient supply of land beyond the time frame of the housing element helps prevent land shortages from bidding up land costs.”

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HOUSING SITES INVENTORY AND ANALYSIS
LAGUNA WOODS, CALIFORNIA

Table G: Potential Housing Unit Production

Site	Name	Vacant/ Nonvac ant Site	Parcel Size (ac)	Proposed Zoning Overlay District	Densities (du/ac)	Development Capacity					Suitable for Lower-Income Households (Density & Parcel Size)	Financially Feasible for Federal & State Funding	Consolidation Potential due to Adjacency of Other Candidate Site
						Income Level				Total			
						Very Low	Low	Moderate	Above Moderate				
1	Town Centre Vacant Lot	V	1.8	Residential HD	30 to 50	10	11	0	60	81	Yes	Yes	Yes
2	Pacific Hills Calvary Chapel Parking Lot	NV	0.696	Residential HD	30 to 50	2	2	0	27	31	Yes	No	No
3	Rossmoor Electric	NV	1.232	Residential HD	30 to 50	5	6	0	44	55	Yes	Yes	No
4	Saddleback Golf Cars	NV	1.235	Residential HD	30 to 50	5	6	0	44	55	Yes	Yes	No
5	Laguna Woods Self Storage	NV	5.249	Residential HD	30 to 50	76	79	0	81	236	Yes	No	Yes
6	Animal Hospital	NV	0.76	Residential HD	30 to 50	2	3	0	29	34	Yes	No	Yes
7	PS Business Park (excludes Jack in the Box)	NV	2.867	Residential HD	30 to 50	24	26	0	79	129	Yes	Yes	No
8	Smart Parke	NV	2.373	Residential HD	30 to 50	6	7	0	50	63	Yes	Yes	No
9	McCormick & Son Mortuary	NV	1.411	Residential MLD	15 to 20	0	0	0	25	25	No	No	Yes
10	Lutheran Church of the Cross	NV	3.028	Residential MLD	15 to 20	0	0	35	19	54	No	Yes	No
11	Geneva Presbyterian Church	NV	3.955	Residential MLD	15 to 20	0	0	49	22	71	No	Yes	No
12	Saint Nicholas Catholic Church	NV	4.596	Residential MLD	15 to 20	0	0	61	22	83	No	Yes	Yes
13	Temple Judea	NV	1.757	Residential LD	8 to 10	0	0	0	15	15	No	No	Yes
14	Laguna Country United Methodist Church	NV	3.899	Residential MD	20 to 30	0	0	85	20	105	Yes	Yes	Yes
15	Medical Building in Town Centre	NV	2.69	Residential HD	30 to 50	22	23	0	76	121	Yes	Yes	Yes
16	Willow Tree Center East	NV	3.095	Residential LD	8 to 10	0	0	0	27	27	No	No	Yes
17	Helm Center	NV	0.65	Residential MLD	15 to 20	0	0	0	11	11	No	No	Yes
Subtotal (units on nonvacant sites only)/93% of Lower Income Units						142	152	230	591	1,115	-	-	-
Subtotal (including all sites)						152	163	230	651	1,196	935	817	738
City's 2021–2029 RHNA Allocation						127	136	192	542	997			
Surplus/(Deficiency)						25	27	38	109	199			
Unmet Need (Only Deficiencies)						-	-	-	-	-			

Source: Compiled by LSA Associates, Inc. (October 2021).

ac = acre(s)

City = City of Laguna Woods

du/ac = dwelling units per acre

NV = nonvacant

Residential HD = Residential High Density

Residential LD = Residential Low Density

Residential MD = Residential Medium Density

Residential MLD = Residential Medium-Low Density

RHNA = Regional Housing Needs Assessment

V = vacant

Table G also indicates that the 17 sites have the capacity to accommodate at least 312 lower-income units, which is 49 units, or 18.6 percent more than the 263 lower-income units included in the City's housing needs allocation. In addition, the sites have the capacity to accommodate at least 211 moderate-income units, which is 19 units, or approximately 9.9 percent more than the 192 moderate income units included in the City's housing needs allocation. Nine of the sites include maximum densities at or above HCD's standard threshold for accommodating lower-income units (30 units per acre) on properties 0.5 to 10 acres in size. In total, 11 of the sites could produce a sufficient number of units that would fall within the generally accepted range of financial feasibility for federal- or State-funded projects (50–150 units per project). Ten of the sites are adjacent to at least one other site, which provides opportunities for lot consolidation, thereby improving viability for development/redevelopment.

Of the 315 lower-income units identified in Table G, 22 units on Site 1 are viewed as realistic for development on vacant land, which represents approximately 8 percent of the City's housing needs allocation for lower-income households. Although the City intends to rely on nonvacant sites to accommodate more than 50 percent of its housing needs allocation for lower-income households, the City has determined that it would not be feasible to develop housing on any other vacant land that is within its jurisdiction. This is due to the fact that, as described in further detail in Section 4.0 of this Housing Sites Inventory and Analysis, most of the limited amount of vacant land that exists within Laguna Woods consists of publicly owned open space properties that are subject to conservation easements or deed restrictions that prohibit future development.

8.0 QUANTIFIED OBJECTIVES

Government Code Section 65583(b)(1) and (2) require that the City establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. Table H summarizes the City's quantified objectives with regard to construction, rehabilitation, and preservation of housing over a five-year time period. These objectives have been established based on the City's available resources and ability to satisfy housing needs within the context of the General Plan requirements set forth in state law.

Table H: Summary of Quantified Objectives

Income Level	Number of Units	Rehabilitation	Conservation/Preservation ¹
Very Low* (<50% of AMI)	127	5	N/A
Low (50–80% of AMI)	136	5	N/A
Moderate (80–120% of AMI)	192	5	N/A
Above Moderate (>120% of AMI)	542	5	N/A
Total	997	20	N/A

¹ As described in the City's Housing Needs Assessment, none of the 17 affordable units within Laguna Woods is at risk of conversion to market rate units in the next 10 years; therefore, none of the units is in need of conservation or preservation.



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EXHIBIT E

PUBLIC PARTICIPATION EFFORTS

CITY OF LAGUNA WOODS

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1.0 INTRODUCTION

Government Code Section 65583(c)(9) requires housing elements to “include a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.” This report has been prepared to document efforts pursuant to Government Code Section 65583(c)(9).

2.0 SUMMARY OF EFFORTS

The Southern California Association of Governments (SCAG) approved ~~the its Final Sixth-6th~~ Cycle Final Regional Housing Needs Assessment (RHNA) Allocation Plan on March 4, 2021, at which point the City of Laguna Wood's (City) housing needs allocation was finalized.

2.1 PUBLIC MEETING #1

On May 5, 2021, the City Council held its first meeting to discuss and consider the RHNA and General Plan Housing Element Update. The meeting took place at Laguna Woods City Hall at 2 p.m. City Council meetings are also televised and closed captioned with reasonable accessibility accommodations available on request. Public comments were accepted in person, in writing, by telephone, or by computer (Zoom). All five members of the City Council participated.

The notice for this meeting was posted on the City's website and at locations pursuant to Government Code Section 54954.2 on April 30, 2021. In addition, on April 30, 2021, email notification was provided to parties who had requested such notification or contacted City staff previously. As of April 30, 2021, the distribution list consisted of 10 email addresses, including residents and representatives from the League of Women Voters of Orange Coast and Orange County United Way.

The presentation at this meeting included an introduction to the RHNA process and an overview of the City's housing needs allocation, required actions, and draft housing needs assessment. Frequently asked questions were also discussed. A draft housing needs assessment and RHNA Frequently Asked Questions document was included in the agenda packet.

At this meeting, one resident spoke during public comments.

2.2 PUBLIC MEETING #2

On May 19, 2021, the City Council held its second meeting to discuss and consider the RHNA and General Plan Housing Element Update. The meeting took place at Laguna Woods City Hall at 2:00 p.m. City Council meetings are also televised and closed captioned with reasonable accessibility accommodations available on request. Public comments were accepted in person, in writing, by telephone, or by computer (Zoom). All five members of the City Council participated.

The notice for this meeting was posted on the City's website and at locations pursuant to Government Code Section 54954.2 on May 14, 2021. In addition, on May 14, 2021, email notification was provided to parties who had requested such notification or contacted City staff previously. As of May 14, 2021, the distribution list consisted of 11 email addresses, including residents and representatives from the League of Women Voters of Orange Coast and Orange County United Way.

The presentation at this meeting included background information on the RHNA process and an overview of the City's housing needs allocation, and draft housing needs assessment. Staff also discussed a number of sites that community members might consider vacant based on appearance and associated constraints that could affect housing development. The City's new project website was

also announced (www.cityoflagunawoods.org/projects). A draft housing sites inventory scenario and RHNA Frequently Asked Questions document were included in the agenda packet.

At this meeting, five residents and Cesar Covarrubias, Executive Director of The Kennedy Commission, spoke during public comments. Written public comments were received from seven residents (including one resident on behalf of the Welcoming Neighbors Home Initiative of Tapestry, a Unitarian Universalist Congregation) and The Kennedy Commission.

2.3 PUBLIC MEETING #3

On June 2, 2021, the City Council held its third meeting to discuss and consider the RHNA and General Plan Housing Element Update. The meeting took place at Laguna Woods City Hall at 11:30 a.m. City Council meetings are also televised and closed captioned with reasonable accessibility accommodations available on request. Public comments were accepted in person, in writing, by telephone, or by computer (Zoom). All five members of the City Council participated.

The notice for this meeting was posted on the City's website and at locations pursuant to Government Code Section 54954.2 on May 28, 2021. In addition, on May 28, 2021, email notification was provided to parties who had requested such notification or contacted City staff previously. As of May 28, 2021, the distribution list consisted of 14 email addresses, including residents and representatives from The Kennedy Commission, Laguna Woods Democratic Club, League of Women Voters of Orange Coast, and Orange County United Way.

The presentation at this meeting included background information on the RHNA process and an overview of the City's housing needs allocation and revised draft housing needs assessment (revised following the May 19, 2021 City Council meeting). A revised draft housing sites inventory scenario, draft California Department of Housing and Community Development (HCD) Housing Element Sites Inventory Form, and RHNA Frequently Asked Questions document were included in the agenda packet. An electronic spreadsheet version of the HCD Housing Element Sites Inventory Form was posted on the City's website on May 28, 2021.

At this meeting, three residents spoke during public comments.

The City Council reached consensus for City staff to proceed with the General Plan Housing Element Update incorporating the housing sites scenario presented at this meeting.

2.4 PUBLIC MEETING #4

On July 21, 2021, the City Council held its fourth meeting to discuss and consider the RHNA and General Plan Housing Element Update. The meeting took place at Laguna Woods City Hall at 2 p.m. City Council meetings are also televised and closed captioned with reasonable accessibility accommodations available on request. Public comments were accepted in person, in writing, by telephone, or by computer (Zoom). All five members of the City Council participated.

The notice for this meeting was posted on the City's website and at locations pursuant to Government Code Section 54954.2 on July 16, 2021. In addition, on July 16, 2021, email notification was provided to parties who had requested such notification or contacted City staff previously. As of July 16, 2021,

the distribution list consisted of 15 email addresses, including residents and representatives from The Kennedy Commission, Laguna Woods Democratic Club, League of Women Voters of Orange Coast, and Orange County United Way.

The presentation at this meeting included background information on the RHNA process and an overview of the City's housing needs allocation, draft General Plan Housing Element, and HCD review process. Drafts of the General Plan Housing Element and HCD Housing Element Sites Inventory Form were included in the agenda packet. An electronic spreadsheet version of the HCD Housing Element Sites Inventory Form was posted on the City's website on July 16, 2021. No change was made to the HCD Housing Element Sites Inventory Form since it was first made publicly available on May 28, 2021.

The agenda report noted that interested parties would have an opportunity to submit public comments directly to HCD during their review process and provided a link to additional information available on HCD's website.

At this meeting, one resident spoke during public comments. Written comments were received from one resident.

The City Council voted 4-1, with then-Mayor Pro Tem Moore voting no, to authorize the City Manager to submit drafts of the updated General Plan Housing Element and Housing Element Sites Inventory Form to HCD for review, as required by Government Code Section 65585.

2.5 HCD REVIEW PERIOD

The City Manager submitted the draft General Plan Housing Element and HCD Housing Element Sites Inventory Form to HCD for review on July 21, 2021 (HCD records this submittal as July 22, 2021, presumably due to the submittal occurring after regular business hours).

During HCD's review period, the following entities and individuals submitted comments directly to HCD, which HCD considered in its review pursuant to Government Code Section 65585(c):

- The Kennedy Commission
- YIMBY Law
- Catherine R Van Camp, resident
- Ramesh C Joshi, resident

HCD's findings were reported ~~reported the results of its review~~ to the City in a letter dated ~~on~~ September 20, 2021.

2.6 CALIFORNIA ENVIRONMENTAL QUALITY ACT PUBLIC COMMENT PERIOD

The draft Initial Study/Negative Declaration (IS/ND) for the General Plan Housing Element Update was made available for a 31-day public comment period between August 17, 2021 and September 16, 2021. A ~~notice~~ Notice of availability-Intent to Adopt (NOIA) announcing the public comment period and providing information on how to access the IS/ND was published in the *Laguna Woods Globe* newspaper on August 12, 2021 and concurrently posted at City Hall and on the City's website. The NOIA was also mailed to all property owners in Laguna Woods and within a 1,000-foot radius of the

City's boundaries, as required by the City's Local California Environmental Quality Act (CEQA) Procedures.

The draft IS/ND was ~~also~~ directly distributed to the following parties:

- California State Clearinghouse
- California Department of Fish and Wildlife South Coast Region
- California Department of Housing and Community Development
- California Department of Toxic Substances Control
- California Department of Transportation (Caltrans) District #12
- California Regional Water Quality Control Board San Diego Region
- California Regional Water Quality Control Board Santa Ana Region
- Capistrano Unified School District
- City of Aliso Viejo Planning Services Department
- City of Irvine Community Development Department
- City of Laguna Beach Community & Economic Development Department
- City of Laguna Hills Community & Economic Development Department
- City of Lake Forest Community Development Department
- El Toro Water District
- Laguna Beach Unified School District
- Native American Heritage Commission
- Orange County Development Services
- Orange County Fire Authority
- Orange County Flood Control District
- Orange County Health Care Agency
- Orange County Transportation Authority
- Orange County Waste & Recycling
- Saddleback Valley Unified School District
- Southern California Air Quality Management District
- Southern California Association of Governments
- Southern California Edison
- Southern California Gas Company
- State Water Resources Control Board
- U.S. Fish & Wildlife Service

On August 17, 2021, the public comment period was extended by one day to September 17, 2021, due to the inadvertent distribution of an incorrect draft of the IS/ND to the parties listed above on August 16, 2021. The correct draft of the IS/ND was distributed on August 17, 2021.

Comments letters were received from the following parties:

- California Department of Housing and Community Development
- California Department of Transportation (Caltrans) District 12
- City of Irvine

- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrielino-Tongva Indian Tribe
- Juaneño Band of Mission Indians, Acjachemen Nation
- Orange County Fire Authority
- Saddleback Valley Unified School District
- Southern California Association of Governments

Individual responses ~~will be~~ provided to each commenting party via mail and email on January 26, 2022 ~~10 days prior to the date of the City Council's public hearing at which adoption of the General Plan Housing Element is considered. The responses included a copy of each party's comment letter and corresponding responses included as part of the Final IS/ND, as well as notice that the City Council was expected to consider adoption of the Final IS/ND at a public meeting on February 9, 2022.~~

While the primary purpose of the public comment period was to solicit input on the draft IS/ND as required by ~~the California Environmental Quality Act (CEQA)~~ CEQA, the draft IS/ND included a project description with site-specific information consistent with the draft General Plan Housing Element and HCD Housing Element Sites Inventory Form acted upon by the City Council at the public meeting on July 21, 2021. A portion of the comments received during the public comment period applied to the project generally, as opposed to the draft IS/ND specifically.

2.7 REVISED DRAFT PUBLIC REVIEW PERIOD

On January 13, 2022, revised drafts of the General Plan Housing Element and HCD Housing Element Sites Inventory Form were posted on the City's website and made available from the City Clerk's Office for a 15-day public review period concluding on January 27, 2022.

A public notice announcing the public review period and providing information on how to access the revised draft documents was published in the *Laguna Woods Globe* newspaper on January 13, 2022. The public notice was posted at City Hall and on the City's website, as well as emailed to parties who had requested such notification or contacted City staff previously, on January 7, 2022. As of January 7, 2022, the distribution list consisted of 15 email addresses, including residents and representatives from The Kennedy Commission, Laguna Woods Democratic Club, League of Women Voters of Orange Coast, and Orange County United Way. The public notice noted the availability of in-person or virtual meetings with City staff to discuss or ask questions regarding the documents, and provided instructions for individuals who require translation services to communicate with the City.

"Clean" and redline versions of the revised draft General Plan Housing Element, and an electronic spreadsheet version of the HCD Housing Element Sites Inventory Form, were posted on the City's website and made available from City Hall on January 13, 2022.

~~<ADDITIONAL INFORMATION REGARDING COMMENTS RECEIVED DURING THE PUBLIC REVIEW PERIOD WILL BE INCLUDED IN THE FINAL DRAFT GENERAL PLAN HOUSING ELEMENT.>~~ During the Revised Draft Public Review Period, the following parties submitted comment letters to the City with additional distribution by the authors as noted:

- Catherine “Kate” R. Van Camp [sent to the City, the City Council, and the City Manager, with copies to HCD (HousingElements@hcd.ca.gov, Paul McDougall, and Marisa Prasse), Rona Henry with Welcoming Neighbors Home, and Cesar Covarrubias, Executive Director of The Kennedy Commission]

This letter expressed general support for the revised draft General Plan Housing Element. The author wrote that, in her opinion, “the requests of the HCD have been met.”

- Welcoming Neighbors Home [sent by Rona Henry on behalf of herself and Rev. Kent Doss, minister of Tapestry Unitarian Universalist Congregation to the City and the City Council, with copies to the City Manager, HCD (HousingElements@hcd.ca.gov, Paul McDougall, and Marisa Prasse), The Kennedy Commission (Cesar Covarrubias, Mildred Perez, Daisy Cruz, and Cynthia Guerra), Kate Van Camp, and Rev. Doss]

This letter expressed general support for the revised draft General Plan Housing Element. The author requested that the City “include a program to implement a Congregational Overlay Zone” and “host a roundtable event with faith organizations located in Laguna Woods to explore the opportunities that exist for them to build.”

Both requests can be considered as part of the rezoning process described in Program H-1.1.1. The rezoning process will include the creation of four new overlay zoning districts and the adoption of minimum density and development standards for each. City staff are available to meet with faith organizations or other interested parties, as requested.

2.8 PUBLIC MEETING #5

On February 9, 2022, the City Council held its fifth meeting to discuss and consider the RHNA and General Plan Housing Element Update. The meeting took place at Laguna Woods City Hall at 2 p.m. City Council meetings are also televised and closed captioned with reasonable accessibility accommodations available on request. Public comments were accepted in person, in writing, by telephone, or by computer (Zoom). All five members of the City Council participated.

The notice for this meeting was posted on the City’s website and at locations pursuant to Government Code Section 54954.2 on February 4, 2022. In addition, on January 20, 2022, email notification was provided to parties who had requested such notification or contacted City staff previously. As of January 20, 2022, the distribution list consisted of 15 email addresses, including residents and representatives from The Kennedy Commission, Laguna Woods Democratic Club, League of Women Voters of Orange Coast, and Orange County United Way.

On February 4, 2022, a second email notification was provided to parties who had requested such notification or contacted City staff previously. The distribution list remained unchanged from the distribution list used for the first notification on January 20, 2022. The second notification included links to the agenda materials and notice that proposed revisions to the January 13, 2022 draft of the General Plan Housing Element were included therein.

Consideration of adoption of the General Plan Housing Element Update and Negative Declaration was additionally noticed as a public hearing. A public notice was published in the *Orange County Register* newspaper on January 27, 2022. The public notice included a project description adapted from the draft IS/ND and information on how to access the draft General Plan Housing Element and draft ND.

Copies of both public comment letters received during the Revised Draft Public Review Period were including in the agenda packet.

Drafts of the proposed General Plan Housing Element and HCD Housing Element Sites Inventory Form were included in the agenda packet, as well as redline versions of all revisions made since the drafts acted upon by the City Council at the public meeting on July 21, 2021. An electronic spreadsheet version of the HCD Housing Element Sites Inventory Form was posted on the City's website on February 4, 2022.

The City Council voted ~~X-X~~ to authorize the City Manager to adopt the General Plan Housing Element Update and Negative Declaration.

<INFORMATION ON THE VOTE WILL BE ADDED AND THIS NOTE DELETED AFTER THE MEETING.>

City Council Meeting TBD

~~<ADDITIONAL INFORMATION REGARDING PUBLIC MEETING #5 AND SUBSEQUENT PUBLIC MEETINGS WILL BE INCLUDED IN THE FINAL DRAFT GENERAL PLAN HOUSING ELEMENT.>~~

2.9 OTHER MEETINGS

On May 17, 2021, the City Manager met via GoToMeeting with Village Management Services, Inc. (Laguna Woods Village) staff (Jeff Parker, CEO and Siobhan Foster, COO) to discuss the RHNA and General Plan Housing Element Update. Subsequent to the meeting, the City Manager forwarded Mr. Parker and Ms. Foster the agenda report for the May 19, 2021 City Council meeting and a RHNA Frequently Asked Questions document.

On May 25, 2021, the City Manager met by telephone with Cesar Covarrubias, Executive Director of The Kennedy Commission, to discuss inclusionary housing and incentives for affordable housing development on non-vacant sites. Subsequent to the meeting, Mr. Covarrubias forwarded the City Manager information on the City of San Clemente's Inclusionary Housing In-Lieu Fee Program Study.

On November 19, 2021, the City Manager met with Kate Van Camp, a resident and housing advocate with Welcoming Neighbors Home, to discuss the General Plan Housing Element Update, review letter from HCD, Ms. Van Camp's email correspondence to the City Manager dated October 3, 2021 (copied to the City Council, Rona Henry with Welcoming Neighbors Home, and Kimberly Adams with Orange County United Way), and various related topics. On November 20, 2021, Ms. Van Camp sent email correspondence as a follow-up to the meeting to the City Council with copies to the City Manager, HCD (HousingElements@hcd.ca.gov and Marisa Prasse), Rona Henry with Welcoming Neighbors Home, and Cesar Covarrubias, Executive Director of The Kennedy Commission.