



City of Laguna Woods Agenda Report

TO: Honorable Mayor and City Councilmembers
FROM: Christopher Macon, City Manager
FOR: February 9, 2022 Adjourned Regular Meeting
SUBJECT: 2021-2029 General Plan Housing Element Update

Recommendation

1. Receive staff report.

AND
2. Open public hearing.

AND
3. Receive public testimony.

AND
4. Close public hearing.

AND
5. Adopt a resolution entitled:

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LAGUNA WOODS, CALIFORNIA, ADOPTING A NEGATIVE DECLARATION FOR THE 2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE, ADOPTING THE 2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE, AND PROVIDING DIRECTION AND MAKING FINDINGS

RELATED TO ADOPTION OF THE 2021-2029 GENERAL PLAN HOUSING ELEMENT REQUIRED BY APPLICABLE STATE LAW

Background

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. For additional information, please refer to Attachment A.

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. If the City had not incorporated, the County of Orange would have retained the authority to make land use planning decisions affecting Laguna Woods. With the City, land use planning is within the purview of the locally elected City Council.

The current 6th Cycle RHNA process (for the period of 10/2021–10/2029) resulted in the following housing needs allocation for the City:

Table 1: City’s Housing Needs Allocation

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

Source: Southern California Association of Governments (“SCAG”)

State law requires the City to update its General Plan Housing Element within 120 calendar days from the statutory due date of October 15, 2021 (February 12, 2022). The update must plan for the 6th Cycle RHNA Housing Needs Allocation.

Please note that **neither the RHNA nor General Plan Housing Element Update processes require the City or any private property owner to construct housing or discontinue any existing non-housing use.** Frequently asked questions are answered in Attachment A.

On May 5, 2021, a City Council meeting was held that focused on an overview of the RHNA and General Plan Housing Element Update processes, and a draft of the Housing Needs Assessment. Public comments were accepted.

On May 19, 2021 and June 2, 2021, City Council meetings were held that focused on the Housing Sites Inventory. Public comments were accepted.

On July 21, 2021, a City Council meeting was held that focused on drafts of the General Plan Housing Element and HCD Housing Element Sites Inventory Form. Public comments were accepted and 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 Sites Inventory Form to HCD for review, as required by California Government Code Section 65585.

Agenda materials and other information from previous City Council meetings are available for public review at or from City Hall during normal working hours and on the City's website (www.cityoflagunawoods.org/projects).

Discussion

At today's meeting, the City Council will conduct a public hearing regarding the proposed 2021-2029 General Plan Housing Element Update (Attachment A), after which adoption will be considered.

If the City Council adopts the 2021-2029 General Plan Housing Element Update at today's meeting, the General Plan Housing Element would be submitted to HCD for an additional round of review required by California Government Code Section 65585. HCD would then have 90 days to report its findings to the City and indicate whether additional revisions are necessary to substantially comply with state law.

If the City Council does not adopt an updated General Plan Housing Element by February 12, 2022, immediate consequences would include:

- Being required to complete future General Plan Housing Element updates every four years for at least eight years, as opposed to every eight years;
- Exposure to civil litigation by private parties; and
- Ineligibility for certain state grants.

Depending on the length of noncompliance, the City could also be subject to legal

action by the State of California, fines of \$10,000 to \$100,000 per month, and the loss of existing local control over development and building permitting.

HCD Review Findings

On July 21, 2021, drafts of the General Plan Housing Element and HCD Housing Element Sites Inventory Form were submitted to HCD for review, as required by California Government Code Section 65585. HCD's findings were reported to the City in a letter dated September 20, 2021 (Attachment B). The proposed 2021-2029 General Plan Housing Element Update includes revisions to comply with state law, which are summarized in Attachment C for ease of reference.

Revisions Since the City Council's July 21, 2021 Action

Attachment D uses redline to identify revisions made to the General Plan Housing Element between receiving HCD's findings on September 20, 2021 and releasing a revised draft for public review on January 13, 2022.

Attachment E 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. Corrections made to the HCD Housing Element Sites Inventory Form are also noted on Attachment E. Comment letters received during the public review period are included as Attachment F.

Summary of Maximum Density and Realistic Capacity Revisions

The proposed 2021-2029 General Plan Housing Element Update includes revisions to the Housing Sites Inventory that are intended to address comments from HCD regarding the likelihood of development, as well as concerns that were expressed at the July 21, 2021 City Council meeting regarding the compatibility of potential future housing projects with existing, adjacent, lower-density residential uses. As summarized in Table 2 and discussed further in Exhibit A, all 17 sites would now be permitted to be developed entirely as housing (instead of limiting the amount of housing on sites 15 and 16 to 55% with the balance reserved for commercial uses). Maximum densities¹ have been reduced on sites 9, 13, 16, and 17.

¹ "Maximum density" refers to the maximum development density allowed for any potential future housing project, unless a housing project qualifies for one or more density bonuses under State Density Bonus Law, in which case the maximum density would be adjusted upward as required by state law.

Table 2: Maximum Density and Realistic Capacity Revisions

PROPERTIES PERMITTED TO BE DEVELOPED AS HOUSING (UP TO 100% HOUSING)			
Site Number	Existing Use	Maximum Density	Realistic Capacity (New Housing Units)
1	Town Centre Vacant Lot	50 units per acre	81
2	Pacific Hills Calvary Chapel Parking Lot	50 units per acre	31
3	Rossmoor Electric	50 units per acre	55
4	Saddleback Golf Cars	50 units per acre	55
5	Laguna Woods Self Storage	50 units per acre	236
6	Animal Hospital	50 units per acre	34
7	PS Business Park (excludes Jack in the Box)	50 units per acre	129
8	Smart Parke	50 units per acre	63
9	McCormick & Son Mortuary	30 units per acre 20 units per acre	38 25
10	Lutheran Church of the Cross	20 units per acre	54
11	Geneva Presbyterian Church	20 units per acre	71
12	Saint Nicholas Catholic Church	20 units per acre	83
13	Temple Judea	20 units per acre 10 units per acre	31 15
14	Laguna Country United Methodist Church	30 units per acre	105
17	Helm Center	30 units per acre 20 units per acre	17 11
PROPERTIES PERMITTED TO BE DEVELOPED AS MIXED-USE (USES SIMILAR TO EXISTING AND UP TO 55% HOUSING)			
Site Number	Existing Use	Maximum Density	Realistic Capacity (New Housing Units)
15	Medical building in Town Centre	50 units per acre	63 121
16	Willow Tree Center East (Olive Garden, Cart Mart, and South County Adult Day Services)	20 units per acre 10 units per acre	29 27

With the revisions summarized in Table 2:

- The maximum densities of potential future housing projects have been reduced on four sites located adjacent to existing, lower-density residential uses (sites 9, 13, 16, and 17) and increased on site 15, which is surrounded on all sides by non-residential uses; and

- Total future housing construction potential on the 17 sites, based on realistic capacities, has increased from 1,175 to 1,196 units. As a result, the excess, or “overzoning,” capacity increased from 17.85% to 19.95%.

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 California 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.”

HCD Housing Element Sites Inventory Form

California Government Code Section 65583.3 requires the housing sites inventory portion of the General Plan Housing Element to be prepared using standards, form, and definitions adopted by HCD. The information required to complete HCD’s Housing Element Sites Inventory Form has been prepared for the proposed 2021-2029 General Plan Housing Element Update and is included as Attachment G. The electronic spreadsheet version of the information 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 electronic spreadsheet.

Impact on Fiscal Years 2021-23 Budget & Work Plan

Adoption of the 2021-2029 General Plan Housing Element Update would shift the City’s focus from developing overarching policy to implementing that policy on the schedule set forth in the General Plan Housing Element. As proposed, the following work is anticipated to occur either in-whole or in-part during the term of the existing Fiscal Years 2021-23 Budget & Work Plan:

CALENDAR YEAR 2022

Program H-1.1.1. Rezone the 17 potential housing sites identified in the Housing Sites Inventory and Analysis to accommodate the City’s housing needs allocation.

Program H-1.2.2. Prepare and maintain a webpage with information related to the 17 potential housing sites identified in the Housing Sites Inventory and Analysis, including a Geographic Information System (GIS) map layer with geospatial information.

Program H-1.2.3. 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.

Program H-1.2.4. 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 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.

Program H-1.2.5. Adopt an ordinance waiving or reducing City building permit fees for 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.

Program H-1.2.6. Amend various, existing housing-related provisions of the Laguna Woods Municipal Code to promote regulatory clarity.

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.

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

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.

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.

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.

CALENDAR YEAR 2023

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.

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.

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.

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.

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.

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.

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.

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

- 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.

CALENDAR YEARS 2022 AND 2023

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.

If the City Council adopts the 2021-2029 General Plan Housing Element Update at today's meeting, staff anticipates immediately initiating the rezoning process required by Program H-1.1.1, while simultaneously developing a plan to reallocate resources (both personnel and budget) to complete the balance of the work.

California Government Code Section 65585 empowers the Attorney General to bring a suit against the City for any action or failure to act that it determines is

inconsistent with state law or the General Plan Housing Element, including any failure to implement any program actions included therein.

Environmental Review

A Negative Declaration (Exhibit B to Attachment A) was prepared to evaluate the physical environmental impacts of this project, in conformance with the provisions of the California Environmental Quality Act (“CEQA”) per State CEQA Guidelines Section 15070 and in conformance with the Local CEQA Procedures. The Negative Declaration finds that the project will have less than significant effects on the environment. A public comment period for the Negative Declaration was initiated on August 17, 2021 and ended on September 16, 2021. Copies of the document were available for public review at City Hall and on the City’s website.

Fiscal Impact

Sufficient funds to support the preparation and adoption of the 2021-2029 General Plan Housing Element Update are included in the City’s budget (General Fund and State of California Grants Fund monies).

Staff anticipates that supplemental General Fund budget appropriations would be necessary to complete the state-mandated implementation of the programs included in the General Plan Housing Element, the extent of which is not yet known, but would be estimated after HCD finds that the 2021-2029 General Plan Housing Element Update and its programs are in substantial compliance with state law. The City has State of California Grants Fund monies presently budgeted to support at least preliminary work on the rezoning process required by Program H-1.1.1.

- Attachments: A – Proposed Resolution
 Exhibit A – Proposed General Plan Housing Element
 Exhibit B – Initial Study/Negative Declaration
 B – HCD Findings Letter dated September 20, 2021
 C – Draft City Response to HCD Findings Letter dated September 20, 2021
 D – Revisions for Draft General Plan Housing Element posted January 13, 2022
 E – Revisions for Proposed General Plan Housing Element posted February 4, 2022
 (supplemental to the Revisions for Draft General Plan Housing Element posted
 January 13, 2022)
 F – Comment Letters Received During the January 2022 Public Review Period
 Exhibit A – Comment Letter from Catherine “Kate” R. Van Camp
 Exhibit B – Comment Letter from Rona Henry and Rev. Kent Doss
 G – Information Required to Complete HCD’s Housing Element Sites Inventory Form
 for the Proposed General Plan Housing Element

ITEM 7.1
Attachment A
Proposed Resolution

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RESOLUTION NO. 22-XX

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LAGUNA WOODS, CALIFORNIA, ADOPTING A NEGATIVE DECLARATION FOR THE 2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE, ADOPTING THE 2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE, AND PROVIDING DIRECTION AND MAKING FINDINGS RELATED TO ADOPTION OF THE 2021-2029 GENERAL PLAN HOUSING ELEMENT REQUIRED BY APPLICABLE STATE LAW

WHEREAS, California Government Code Section 65300 requires every city to adopt a comprehensive, long-term general plan to guide physical development of the city and of any land outside its boundaries which, in the City’s judgment, bears relation to its planning; and

WHEREAS, California Government Code Section 65302 requires general plans to include a housing element with specific requirements for form and content set forth in California Government Code Section 65580 et al.; and

WHEREAS, California Government Code Section 65588 requires general plan housing elements to be updated on either a five- or eight-year cycle; and

WHEREAS, as required by and in accordance with state law, the City has prepared an update of its General Plan Housing Element covering the 6th Cycle Planning Period spanning October 2021 through October 2029 and planning for the Regional Housing Needs Assessment’s 6th Cycle Housing Needs Allocation of 997 housing units (“2021-2029 General Plan Housing Element Update”), which is attached hereto as Exhibit A and incorporated herein by this reference; and

WHEREAS, the City has considered findings received from the California Department of Housing and Community Development (“HCD”) following HCD’s review of a draft of the 2021-2029 General Plan Housing Element Update dated July 2021, and made corresponding revisions to comply with state law, which are incorporated into the 2021-2029 General Plan Housing Element Update; and

WHEREAS, based on the factors described in the 2021-2029 General Plan Housing Element Update [including, but not limited to, the analysis contained in Exhibit C (Housing Sites Inventory and Analysis) thereto, supported by the goals, policy objectives, and programs set forth in the General Plan Housing Element], the City Council finds that the existing uses on the 17 potential housing sites

identified in the housing sites inventory to accommodate the Regional Housing Needs Assessment for lower income households are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the planning period; and

WHEREAS, following the preparation of an Initial Study for the 2021-2029 General Plan Housing Element Update, a Negative Declaration was prepared to evaluate the physical environmental impacts of the 2021-2029 General Plan Housing Element Update, in conformance with the provisions of the California Environmental Quality Act (“CEQA”) per State CEQA Guidelines Section 15070 and in conformance with the Local CEQA Procedures, which is attached hereto as Exhibit B and incorporated herein by this reference. The Negative Declaration finds that the 2021-2029 General Plan Housing Element Update will have less than significant effects on the environment; and

WHEREAS, on February 9, 2022, the City Council held a duly noticed public hearing on the 2021-2029 General Plan Housing Element Update (including, without limitation, the Initial Study/Negative Declaration) at which the members of the City Council, utilizing their independent judgement, reviewed and considered all of the information, evidence, and testimony presented, both written and oral.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF LAGUNA WOODS, DOES HEREBY RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:

SECTION 1. The above recitals are true and correct.

SECTION 2. The City Council hereby adopts the 2021-2029 General Plan Housing Element Update (Exhibit A) and Negative Declaration (Exhibit B), subject to the City Manager modifying the 2021-2029 General Plan Housing Element Update to reference the vote taken to adopt this resolution.

SECTION 3. The City Manager is directed to promptly submit a copy of the adopted 2021-2029 General Plan Housing Element Update to HCD, as required by California Government Code Section 65585(g), and to the El Toro Water District, as required by California Government Code Section 65589.7(a).

SECTION 4. The Mayor shall sign this resolution and the City Clerk shall attest and certify to the passage and adoption thereof.

PASSED, APPROVED AND ADOPTED on this XX day of XX 2022.

CAROL MOORE, Mayor

ATTEST:

YOLIE TRIPPY, CMC, City Clerk

STATE OF CALIFORNIA)
COUNTY OF ORANGE) ss.
CITY OF LAGUNA WOODS)

I, YOLIE TRIPPY, City Clerk of the City of Laguna Woods, do HEREBY CERTIFY that the foregoing **Resolution No. 22-XX** was duly adopted by the City Council of the City of Laguna Woods at an adjourned regular meeting thereof, held on the XX day of XX 2022, by the following vote:

AYES: COUNCILMEMBERS:
NOES: COUNCILMEMBERS:
ABSENT: COUNCILMEMBERS:

YOLIE TRIPPY, CMC, City Clerk

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ITEM 7.1

Exhibit A to Attachment A

Proposed General Plan Housing Element

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CITY OF LAGUNA WOODS GENERAL PLAN HOUSING ELEMENT

**6TH CYCLE (2021-2029)
FEBRUARY 2022**

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City of Laguna Woods General Plan

HOUSING ELEMENT

February 2022

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., (2) permitting housing projects by right, as required by state law, (3) 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, (4) establishing densities for potential housing sites as specified in Table G in Exhibit C, and (5) 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-1.2.2. 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
Quantified Objectives: Conforming Webpage and GIS Map Layer



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Program H-1.2.3. 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-1.2.4. 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-1.2.5. Adopt an ordinance waiving or reducing City building permit fees for 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

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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-1.2.6. 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

Quantified Objectives: Conforming Ordinance



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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.

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

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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 permit supportive housing by right in all zoning districts where multifamily and mixed uses are permitted.

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.
- 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



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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.

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 related to emergency shelters, including amending the ordinance as necessary.

Primary Responsibility: Planning & Environmental Services Department

Anticipated Timeline: Ongoing

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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

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



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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
 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.

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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.

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.



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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; 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-1.2.3 (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

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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:

- 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



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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.

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

EXHIBIT A
HOUSING NEEDS ASSESSMENT

CITY OF LAGUNA WOODS

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LSA

January 2022

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HOUSING NEEDS ASSESSMENT

CITY OF LAGUNA WOODS

Submitted to:

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January 2022

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LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
ACS	American Community Survey
AFFH	Affirmatively Furthering Fair Housing
AMI	area median income
CalEnviroScreen	California Communities Environmental Health Screening Tool
CBC	California Building Code
CC	Community Commercial
City	City of Laguna Woods
CoC	Continuum of Care
County	County of Orange
CUP	Conditional Use Permit
DDS	California Department of Developmental Services
FHCOC	Fair Housing Council of Orange County
HCD	Housing and Community Development Department of the State of California
HUD	United States Department of Housing and Urban Development
LIHTC	Low Income Housing Tax Credit
OEHHA	Office of Environmental Health Hazard Assessment
RC	Residential Community
RHNA	Regional Housing Needs Assessment
RMF	Residential Multifamily
SCAG	Southern California Association of Governments

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1.0 HOUSING NEEDS ASSESSMENT

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. Specifically, Government Code Section 65583(a) requires an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. This section of the Housing Element examines the characteristics of Laguna Woods' population and housing stock as a means of better understanding the nature and extent of unmet housing needs. The Housing Needs Assessment is comprised of the following components: (1) Demographic Profile; (2) Household Profile; (3) Housing Stock Characteristics; (4) Affirmatively Furthering Fair Housing; and (5) Regional Housing Needs.

1.1 DEMOGRAPHIC PROFILE

Demographic changes such as population growth or changes in age can affect the type and amount of housing needed in a community. This section addresses the population, age, and race and ethnicity of Laguna Woods residents.

1.1.1 Population Growth and Trends

Table A presents population growth trends in Laguna Woods from 1990 to 2020 and compares this growth to neighboring jurisdictions and Orange County. As shown, Orange County experienced the highest level of growth during the 1990s (18 percent). Neighboring jurisdictions experienced their highest level of growth during the 2000 to 2010 period (48 percent in Irvine and almost 32 percent in Lake Forest). However, during the 2000 to 2010 period, Laguna Woods experienced a decrease in its population. As will be discussed in further detail below, Laguna Woods residents are significantly older, on average, than the rest of Orange County. This means that Laguna Woods' population growth due to natural increase (births minus deaths) is slower than other parts of Orange County.

Table A: Regional Population Growth Trends

Jurisdiction	1990	2000	2010	2020	Percent Change		
					1990–2000	2000–2010	2010–2020
Laguna Woods	N/A	17,794	16,273	16,243	N/A	-8.55%	-0.18%
Aliso Viejo	N/A	N/A	47,816	50,044	N/A	N/A	4.66%
Irvine	110,330	143,072	212,375	281,707	29.68%	48.44%	32.65%
Laguna Beach	23,170	23,727	22,723	22,343	2.40%	-4.23%	-1.67%
Laguna Hills	N/A	29,891	30,270	31,508	N/A	1.27%	4.09%
Lake Forest	N/A	58,707	77,395	84,711	N/A	31.83%	9.45%
Orange County	2,410,668	2,846,289	3,010,232	3,194,332	18.07%	5.76%	6.12%

Sources: (1) California Department of Finance, Demographic Research Unit, Report E-5;

(2) California Department of Finance, Demographic Research Unit, Report E-8 City/County/State Population and Housing Estimates;

(3) California Department of Finance, Demographic Research Unit, E-4 Revised Historical.

N/A = Not Applicable

Census data from 2000 to 2010 show that a reduction in the population growth rate for Orange County occurred during the decade. Countywide, population growth dropped to approximately 6 percent, while some local communities, such as Irvine and Lake Forest, experienced robust growth due to the development of new housing. Laguna Woods experienced a population decrease of approximately 9 percent during this period.

While most of the neighboring communities grew modestly between 2010 and 2020, the population of Laguna Woods in 2020 was estimated to be 16,243, approximately less than 1 percent lower than in 2010. The growth rate of Orange County as a whole was 6 percent, more than six times that of Laguna Woods. Of the surrounding communities shown, only Aliso Viejo had a growth rate that was close to that of Orange County. Laguna Woods saw a 0.18 percent population decrease from 2010 to 2020. However, this is much less of a decrease compared to the previous decade.

The Southern California Association of Governments (SCAG) projects that the population of Laguna Woods will grow to 16,500 by 2045. This represents a growth rate of approximately 1.6 percent over the next 25 years. It should be noted that SCAG's growth projection does not reflect potential population growth due to Laguna Woods' RHNA allocation, which is discussed in further detail in Section 1.5, Regional Housing Needs.

1.1.2 Age Characteristics

Table B shows the age distribution and median age of Laguna Woods' population in 2010 and 2018 and compares this with Orange County as a whole. Table B indicates that seniors aged 65 and older were the largest population group in Laguna Woods in 2010 (80 percent) and 2018 (83 percent). The proportion of the population within the younger age groups (under 5 years, 5 to 17 years, and 18 to 24 years) decreased since 2010, while there was an increase in the older adult population. The proportion of seniors (ages 65 and older) increased from 80 percent to 83 percent. However, Laguna Woods' median age decreased from 78 in 2010 to 75 in 2018.

Table B: Age Distribution

Age Group	2010		2018		
	Population	Percent	Population	Percent	Orange County Percent
Under 5 years	33	0.2%	0	0.0%	6.0%
5-17 years	65	0.4%	10	0.1%	17.0%
18-24 years	49	0.3%	23	0.1%	9.5%
25-44 years	179	1.1%	100	0.6%	27.4%
45-64 years	2,982	18.3%	2,666	16.5%	26.6%
65+ years	12,987	79.7%	13,429	82.8%	13.9%
Total	16,295	100.0%	16,228	100.0%	100.0%
Median Age	78		75		38

Sources: (1) 2010 ACS 5-Year Estimates (Table S0101);
(2) 2018 ACS 5-Year Estimates (Table S0101).

Overall, the age distribution for Laguna Woods is skewed toward higher percentages of senior populations compared with Orange County as a whole. As shown in Table B, the percentage of the Laguna Woods' population that is 65 years of age and older (83 percent) is substantially higher than that of Orange County (14 percent). Laguna Woods' median age (75) is also substantially higher than

Orange County's median age (38). This reflects the fact that a large percentage of Laguna Woods residents live in Laguna Woods Village, an age-restricted retirement community for residents who are 55 years of age and older that occupies a majority of Laguna Woods' area. The proportion of children (ages 17 and under) and adults aged 18 to 64 are also notably lower in Laguna Woods compared to Orange County.

1.1.3 Race and Ethnicity

Historically, White residents have been the majority racial group within Laguna Woods. Table C displays the racial and ethnic composition of Laguna Woods' population in 2010 and 2018 and compares this with the countywide distribution. While changes since 2010 have generally been slight, Laguna Woods is trending toward a more diverse population. In 2018, White residents made up 78 percent of Laguna Woods' population, representing an 11 percent decrease since 2010. The proportion of White residents in Laguna Woods is also notably higher than that of Orange County as a whole (61 percent countywide).

Table C: Racial and Ethnic Composition (2010 and 2018)

Racial/Ethnic Group	2010		2018		
	Persons	Percent	Persons	Percent	Orange County Percent
White	14,499	89.0%	12,678	78.1%	61.7%
Asian/Pacific Islander	1,357	8.3%	3,142	19.4%	20.4%
Black or African American	126	0.8%	73	0.4%	1.7%
American Indian	0	0.0%	8	0.0%	0.5%
Other Race	208	1.3%	172	1.1%	11.7%
Two or More Races	105	0.6%	155	1.0%	4.1%
Total	16,295		16,228		
Hispanic	723	4.4%	821	5.1%	34.1%
Non-Hispanic	15,572	95.6%	15,407	94.9%	65.9%
Total	16,295		16,228		

Sources: (1) 2010 ACS 5-year estimates (Tables C02003 and B03003);
(2) 2018 ACS 5-year estimates (Tables C02003 and B03002).

While only representing 19 percent of the total population in 2018, the number of Asian/Pacific Islander residents has increased by 11 percent since 2010. Laguna Woods' Asian/Pacific Islander population is now on par with Orange County (19 percent compared to 20 percent). Chinese is the predominant Asian ethnicity represented in Laguna Woods, making up approximately 9 percent of Laguna Woods' total population. There are also large populations of Korean and Filipino residents within Laguna Woods.

The Hispanic population increased by approximately 1 percent from 2010 to 2018. The estimated proportion of Hispanic residents in 2018 was 5 percent, still markedly lower than Orange County, which has an estimated 34 percent Hispanic population.

1.1.4 Employment

An evaluation of the types of jobs held by community residents provides insight into potential earning power and the segment of the housing market into which they fall. Information on how a

community's employment base is growing and changing can help identify potential housing demand changes in the future.

The State Employment Development Department estimates that 2,900 Laguna Woods residents (or approximately 18 percent of Laguna Woods' population) were in the labor force in January 2021. This reflects the fact that Laguna Woods' housing stock is predominantly age-restricted. Laguna Woods has seen a drastic increase in unemployment since March 2020 due to the onset of the COVID-19 pandemic. In January 2020, Laguna Woods' unemployment rate was at 2.2 percent; however, it rose sharply in the spring and peaked at 11.6 percent in May 2020. As of January 2021, the unemployment rate within Laguna Woods was 5.6 percent. The unemployment rate of Orange County was at 2.9 percent in January 2020 and has seen a similar spike. As of January 2021, unemployment in Orange County as a whole was 7.4 percent. While the region's economy appears to show signs of recovery, the long-term impacts of the COVID-19 pandemic on employment within Laguna Woods and Orange County remain unknown.

Table D presents the occupations of Laguna Woods residents, based on the 2014–2018 American Community Survey (ACS) estimates. The largest proportion of Laguna Woods residents are employed in educational services and health care and social assistance occupations at 22 percent, followed by finance and insurance and real estate, rental, and leasing occupations at 15.6 percent. Approximately 61 percent of employed residents in Laguna Woods commute less than 25 minutes to work, indicating that a majority of working residents hold jobs within Laguna Woods or in immediately adjacent communities.

Table D: Occupation of Residents (2018)

Occupation	Population	Percent
Agriculture, forestry, fishing and hunting, and mining	0	0.0%
Construction	52	1.7%
Manufacturing	285	9.2%
Wholesale trade	123	4.0%
Retail trade	347	11.2%
Transportation and warehousing, and utilities	78	2.5%
Information	42	1.4%
Finance and insurance, and real estate and rental and leasing	484	15.6%
Professional, scientific, and management, and administrative and waste management services	483	15.5%
Educational services, and health care and social assistance	695	22.4%
Arts, entertainment, and recreation, and accommodation and food services	249	8.0%
Other services, except public administration	188	6.0%
Public administration	83	2.7%
Total Civilians Employed	3,109	100.00%

Source: 2018 ACS 5-year estimates (Table S2405).

Laguna Woods itself has a limited employment base. As of 2019, the five largest employers in Laguna Woods were Laguna Woods Village, Professional Community Management of California, Stater Brothers, Rainbow Realty Corporation, and OCB Restaurant Company.

In 2019, the Orange County Business Council updated the results of its Workforce Housing Scorecard. This report provides a comprehensive evaluation of the current and future state of Orange County's housing supply and demand and its impact on the business community. Based on the following criteria, the scorecard rates each jurisdiction's record over the 2016 to 2030 time period in addressing workforce housing needs:

- Total job growth
- Housing as a percent of total Orange County housing
- Jobs-to-housing ratio
- Change in housing density

Based on the above factors, Laguna Woods ranks 33rd of the 34 cities in Orange County. Rankings are weighted toward larger cities and cities experiencing new housing development (Irvine was ranked 1st); therefore, a ranking of 33rd is expected for Laguna Woods, as it is the 31st largest city within Orange County and has not experienced any new housing growth since the development of the San Sebastian Apartments in 2008. It should be noted that Laguna Woods ranked 26th in job growth, indicating a modest need for new housing within Laguna Woods.

1.2 HOUSEHOLD PROFILE

Household type and size, income levels, and the presence of special-needs populations all affect the type of housing needed by residents and are important indicators of where intervention and/or housing programs may be needed. Household income levels are indicators of housing affordability, just as the ratio of owners to renters may impact the stability of the housing market. This section details the various household characteristics affecting housing needs in Laguna Woods.

1.2.1 Household Type

A household is defined as the total number of persons living in a housing unit, whether related or unrelated. The Census Bureau definition of a "family" is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family. A single person living alone is also a household. "Other" households are unrelated people residing in the same dwelling unit. Group quarters, such as dormitories or convalescent homes, are not considered households.

As shown in Table E, the 2014–2018 ACS estimates there are 11,156 households in Laguna Woods, with an average household size of 1.45 persons and an average family size of 2.07 persons. While the average household size in Laguna Woods saw a 2.8 percent increase from 2010, the average family size decreased by 2.4 percent. Laguna Woods' average household and family size is lower compared to that of Orange County as a whole (3.02 and 3.51, respectively).

Table E: Household Characteristics (2010 and 2018)

Household & Family Type	2010		2018		Percent Change
	Number	Percent	Number	Percent	
Total Population	16,295	100.0%	16,228	100.0%	-0.4%
In Group Quarters	167	1.0%	N/A	N/A	N/A
Total Households	11,470	100.0%	11,156	100.0%	-2.7%
Family Households	3,733	32.5%	4,107	36.8%	10.0%
Married Couple Families	3,215	28.0%	3,645	32.7%	13.4%
Single Parent Households	29	0.3%	0	0.0%	-100.0%
Non-family Households	7,737	67.5%	7,049	63.2%	-8.9%
Householder Living Alone	7,272	63.4%	6,593	59.1%	-9.3%
Householder 65+ (Alone)	6,343	55.3%	5,723	51.3%	-9.8%
Average Household Size	1.41		1.45		2.8%
Average Family Size	2.12		2.07		-2.4%

Sources: (1) 2010 and 2018 ACS 5-year estimates (Table S1101);

(2) 2010 Census (Table PCT38).

N/A = Not Applicable

Nonfamilies constitute the majority of households in Laguna Woods (63 percent). The proportion of single-parent households has also remained steady at approximately 4 percent of all households. Family households constituted about 37 percent of all households in 2018, an increase of 10 percent since 2010. Approximately 90 percent of family households are married-couple households, and this has increased since 2010. The proportion of householders living alone also decreased between 2010 and 2018.

1.2.2 Household Income

Household income is one of the most important factors affecting housing opportunity and determining a household's ability to balance housing costs with other basic necessities of life while avoiding housing problems such as cost burden and overcrowding.

1.2.2.1 Income Definitions

The State and federal governments classify household income into several groupings based upon the relationship to the county area median income (AMI), adjusted for household size. The Housing and Community Development Department of the State of California (HCD) utilizes the income groups presented in Table F. Federal housing programs utilize slightly different income groupings and definitions, with the highest income category generally ending at >95 percent AMI. For purposes of the Housing Element, the State HCD income definitions are used throughout, with the exception of data compiled by the United States Department of Housing and Urban Development (HUD), which is specifically noted.

Table F: HCD Income Categories

Income Category	Percent Annual Median Income (AMI)
Extremely Low	0-30% AMI
Very Low	0-50% AMI
Low	51-80% AMI
Moderate	81-120% AMI
Above Moderate	120%+ AMI

Source: California Department of Housing and Community Development.

1.2.2.2 Income Characteristics

The 2014–2018 ACS estimated the median annual income of households in Laguna Woods to be \$41,928. This is an increase of approximately 13 percent from 2010, when the median annual income was \$36,818. Figure 1 illustrates the 2018 median household income for Laguna Woods and surrounding communities and compares them to the median income for Orange County. Of the jurisdictions included, Laguna Woods had a significantly lower median household income than the Orange County median of \$85,398.

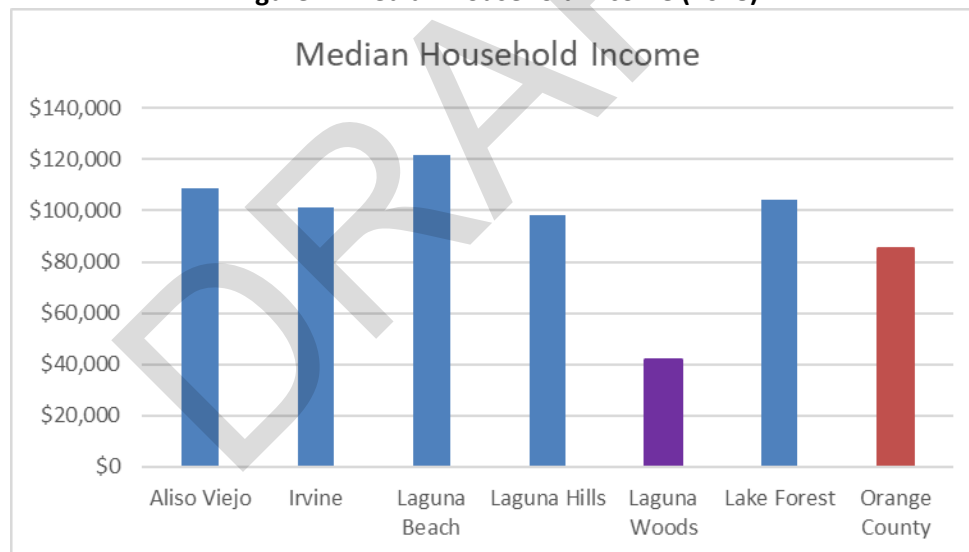
Figure 1: Median Household Income (2018)

Table G shows the number of Laguna Woods households living within the HCD income categories described above for 2010 and 2017. The number of households within the very low- and low-income categories has decreased overall since 2010. As of 2017, approximately 69 percent of Laguna Woods households fell within one of the lower income categories. The proportion of households with moderate or above-moderate incomes increased from 30.1 percent in 2010 to 31.1 percent in 2017.

Table G: Household Income Levels (2010–2018)

Income Level	2010		2017		2010–2017 Percent Change
	Households	Percent	Households	Percent	
Extremely Low Income (<30% AMI)	2,870	25.2%	2,880	25.6%	0.3%
Very Low Income (31-50% AMI)	2,650	23.3%	2,455	21.8%	-7.4%
Low Income (51-80% AMI)	2,435	21.4%	2,415	21.5%	-0.8%
Moderate/Above Moderate Income (>80% AMI)	3,420	30.1%	3,500	31.1%	2.3%
Total Households	11,375	100.0%	11,250	100.0%	-1.1%

Source: CHAS Data, 2010 and 2017.

AMI = Annual Median Income

Table H shows the income level of Laguna Woods households by tenure. A total of 76 percent of renter households were lower income (<80 percent AMI), compared to 67 percent of owner households. 31 percent of renter households were categorized as extremely low income (<30 percent AMI), and 26 percent were very low income households (31 to 50 percent AMI).

Table H: Household Income Levels by Tenure (2017)

Income Level	Renter		Owner	
	Households	Percent	Households	Percent
Extremely Low Income (<30% AMI)	840	31.2%	2,040	23.8%
Very Low Income (31-50% AMI)	685	25.5%	1,770	20.7%
Low Income (51-80% AMI)	505	18.8%	1,910	22.3%
Moderate Income & Above (> 80% AMI)	660	24.5%	2,840	33.2%
Total	2,690	100.0%	8,560	100.0%

Source: CHAS Data, 2017.

AMI = Annual Median Income

1.2.2.3 Households in Poverty

The federal government publishes national poverty thresholds that define the minimum income level necessary to obtain the necessities of life. Table I shows the number of households within Laguna Woods living in poverty by household type. A total of 242 households within Laguna Woods are living below the federal poverty threshold, representing approximately 6 percent of all households. Approximately 1 percent of all households in Laguna Woods are female-headed households living below the poverty level. Of these female-headed households living below the poverty level, 9 of the households (or 0.2 percent of all households in Laguna Woods) have children under the age of 18. Another significant group living in poverty are seniors. As shown in Table I, approximately 6 percent of all households in Laguna Woods are senior-headed households living below the poverty level.

Table I: Poverty by Household Type

Household Type	Below Poverty Level	
	Number	Percent
Family Households	242	6.1%
Female-Headed Households	36	0.9%
With Children	9	0.2%
Senior-Headed Households (65+)	230	5.8%

Source: 2019 ACS 5-year estimates.

1.2.3 Special-Needs Populations

State law recognizes that certain households have more difficulty in finding adequate and affordable housing due to special circumstances and may also have lower incomes as a result of these circumstances. Special-needs populations include seniors, persons with disabilities, female-headed households, large households, farmworkers, and the homeless. Table J summarizes the special-needs populations in Laguna Woods. Each of these population groups, as well as their housing needs, is described below.

Table J: Special Needs Groups

Special Needs Group	Persons or Households	Renter	Owner	Percent of Total
Households with a Senior Member	9,701	--	--	88.2%
Senior-headed Households	3,495	--	--	26.3%
Seniors Living Alone	5,622	--	--	42.3%
Single-Parent Households	0	--	--	0.0%
Female Single-Parent Households	0	--	--	0.0%
Large Households (5+ members)	13	0	13	0.3%
Agricultural Workers	0	--	--	0.0%
Persons with Disabilities	4,364	--	--	27.3%
Homeless	5	--	--	0.04%

Sources: (1) 2019 ACS 5-year estimates;
(2) 2019 homelessness point-in-time counts processed by SCAG.
-- = Data not available.

1.2.3.1 Large Households

Large households consist of five or more persons and are considered a special-needs group due to the limited availability of affordable and adequately sized housing. Large households often live in overcrowded conditions due to both the lack of large-enough units and insufficient income to afford available units of adequate size. In 2018, Laguna Woods had a total of 13 large households, representing 0.3 percent of total households in Laguna Woods. These large households consisted entirely of owner households (Table J). Laguna Woods has a small number of larger homes compared to many communities in the region, with only 100 housing units (0.9 percent of all occupied housing units) containing four or more bedrooms, according to the 2014–2018 ACS. This suggests that Laguna Woods does not have any unmet housing need for large households.

1.2.3.2 Senior Households

Approximately 83 percent of Laguna Woods residents are age 65 or older. This is an increase from 2010, when 80 percent of the population were seniors. Senior-headed households make up a significant proportion (26 percent) of all households in Laguna Woods. Additionally, 42 percent of all households in Laguna Woods are seniors living alone.

Seniors may have a number of special needs including, housing, transportation, health care, and other services. Approximately 30 percent of Laguna Woods' senior population has one or more disability that may need to be taken into consideration when finding appropriate housing. Rising rents are a particular concern due to the fact that most seniors are on fixed incomes.

Laguna Woods is unique in that it predominantly comprises private communities that are age-restricted for adults 55 years and older. Of the housing units in Laguna Woods, the majority are located in the private gated community of Laguna Woods Village, with the remaining units in four separate communities. The various housing options, levels of amenities, and services provided at each of these communities are described below. There is a discrepancy of the total number of housing units located in Laguna Woods between City of Laguna Woods (City) records and the United States Census. It should be noted that the City's records, which reflect the numbers identified below, total 13,386, which is 988 more than what is identified by the United States Census (12,398 housing units).

- **Laguna Woods Village:** Laguna Woods Village contains 12,736 owned condominium and cooperative units. Owners within Laguna Woods Village pay a homeowners' association fee that is used to provide residents with public transportation, patrolled private security, clubhouses with special programs, and recreational activities. Also included within the Laguna Woods Village community are two golf courses for the private use of Laguna Woods Village residents.
- **Las Palmas:** Las Palmas is a licensed residential care community with 184 rental units. Services include the dispensing of medication and assistance with bathing, dressing, and other activities of daily living determined by a care plan tailored to specifically meet the individual needs of the residents. Amenities include meal service, transportation, housekeeping, laundry services, and access to recreational facilities, including a putting green, shuffleboard court, pool, and spa. Activity programs include regular trips to shopping centers and other destinations.
- **The Regency:** The Regency is a licensed residential care community that consists of 192 rental units for seniors and offers both independent and assisted living on a month-to-month basis. Services and amenities include daily meals, housekeeping, laundry services for bed and bath linens, scheduled transportation, group excursions, and social events. The Regency is the only residential community that, under unique circumstances, will accommodate individuals younger than 55 within its assisted living facility.
- **San Sebastian:** San Sebastian contains 134 rental units, including 17 affordable units for lower-income residents. San Sebastian is also an age-restricted independent living apartment facility; therefore, all of the affordable housing units at San Sebastian are reserved for seniors.
- **Whispering Fountains:** Whispering Fountains contains 140 rental units. Although age-restricted, the Fountains operates as an apartment community and does not provide assisted living services, special programs, or amenities.

Several resources for seniors exist in and near Laguna Woods and include the following:

- **Age Well Senior Services:** This nonprofit organization provides health and wellness programs, home delivery of meals, and nonemergency medical transit service to seniors in Laguna Woods. The organization operates the Florence Sylvester Memorial Senior Center in neighboring Laguna Hills, where it provides congregate meals, social services case management, senior activities and classes, information, and referral services.

- **Foundation of Laguna Woods Village:** This nonprofit organization partners with the Laguna Woods Village Social Services Department to provide temporary emergency financial assistance with supermarket cash cards, prescription payments, bill payments for utility services, medical and dental, caregiver and respite care services, taxi vouchers for travel to health care providers in Orange County, and gas cards to qualifying residents of Laguna Woods Village.
- **Helping Hands Senior Foundation:** This nonprofit organization provides social workers who can connect seniors with free or low-cost in-home health care, palliative care, adult day care, medical equipment, food assistance, and financial assistance resources, as well as provide support with navigating health insurance claims and payments.
- **Laguna Woods Village Social Services Department:** This private organization offers social workers who can help Laguna Woods Village residents with short-term counseling, crisis intervention, support groups, educational programs, long-term care planning, and resource referrals.
- **Orange County Housing Authority:** This government agency is responsible for administering federally funded programs that provide monthly rental assistance to qualified tenants, including low-income seniors, in privately owned rental housing in Orange County. The largest such program is referred to as the Housing Choice Voucher Program. Participants who receive a Housing Voucher can use this rental assistance in a variety of rental dwellings and locations with almost any property owner who is willing to participate in the program.

Based on the available resources in the community, there is no unmet need for senior housing.

1.2.3.3 Single-Parent Households

Single-parent households typically have a special need for such services as childcare and health care, among others, and often live with only one income. According to the 2014–2018 ACS, Laguna Woods did not have any single-parent households with young children (under the age of 18) (Table J). Therefore, Laguna Woods does not have any unmet housing need for single-parent households, including female-headed households.

1.2.3.4 Persons with Disabilities

Under the Americans with Disabilities Act (ADA), an individual with a disability is defined as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.¹ Major life activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending,

¹ United States Department of Justice. 2020. A Guide to Disability Rights Laws. February. Website: <https://www.ada.gov/cguide.htm#anchor62335> (accessed April 23, 2021).

speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.² Disabled persons often have special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher health costs associated with a disability. In recognition of the fact that disabilities can affect a range of major life activities, the ACS questionnaire gathers data about six key disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care disability, and independent living difficulty. Table K shows the number of Laguna Woods residents with a disability as well as the number of Laguna Woods residents 65 years of age or older that have a disability. According to the 2014–2018 ACS, an estimated 27 percent of Laguna Woods residents (4,364 persons) have one or more disabilities. Approximately 30 percent of the senior population have one or more disabilities.

Table K: Disability Status

Disability Type	Persons with Disability	Percent of Total	Persons with Disability, Age 65+	Percent of Total
With a hearing difficulty	1,844	11.5%	1,733	13.1%
With a vision difficulty	705	4.4%	658	5.0%
With a cognitive difficulty	1,058	6.6%	925	7.0%
With an ambulatory difficulty	2,651	16.6%	2,473	18.7%
With a self-care difficulty	1,180	7.4%	1,123	8.5%
With an independent living difficulty	1,774	11.1%	1,650	12.5%
Total Persons with Disabilities	4,364	100.00%	3,972	100.00%

Source: 2019 ACS 5-year estimates (Table S1810).

Disabled individuals have unique housing needs because they may be limited in mobility or in their ability to care for themselves. In addition, the earning power of disabled persons may be limited. Their housing need is also often compounded by design and location requirements, which can drive up housing costs. For example, wheelchair-bound or semi-ambulatory individuals may require ramps, holding bars, special bathroom designs, wider doorways, lower cabinets, and other interior and exterior design features. Affordable housing and housing programs that address accessibility can assist these individuals with their specific housing needs.

There are a number of housing types appropriate for people living with a disability: rent-subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Housing Choice vouchers, special programs for home purchase, HUD housing, and group homes. The design of housing accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this needs group. Incorporating barrier-free design in all new multifamily housing (as required by California and federal fair housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

² United States Department of Labor. 2009. ADA Amendments Act of 2008 Frequently Asked Questions. January 1. Website: <https://www.dol.gov/agencies/ofccp/faqs/americans-with-disabilities-act-amendments#:~:text=Major%20life%20activities%20include%2C%20but,thinking%2C%20communicating%2C%20and%20working> (accessed April 23, 2021).

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (that is, modifications or exceptions) in their zoning and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to allow covered ramps in the setbacks of properties that have already been developed to accommodate residents with mobility impairments.

The City does not require special building codes or onerous project review to construct, improve, or convert housing for persons with disabilities. Community care facilities with six or fewer persons are permitted by right in all residential zoning districts. Community care facilities with seven or more persons are permitted in all residential zoning districts, subject to Conditional Use Permit (CUP) approval. In addition, several housing types for persons with disabilities require a CUP that is no more stringent than those for other conditional uses:

- Congregate care facilities are permitted with an approved use permit in all residential zones and the Community Commercial (CC) zone.
- Family Day Care for 14 or fewer persons is also permitted in the Residential Multifamily (RMF) and Residential Community (RC) zones.

The City has adopted the 2019 California Building Code (CBC). Standards within the CBC include provisions to ensure accessibility for persons with disabilities. These standards are consistent with the Americans with Disabilities Act. No local amendments that would constrain accessibility or increase the cost of housing for persons with disabilities have been adopted.

As discussed previously, Laguna Woods has two residential care facilities that are licensed by the State Community Care Licensing Division of the California Department of Social Services: Las Palmas and the Regency.

1.2.3.5 Developmentally Disabled

According to California Welfare and Institutions Code Section 4512, a developmental disability means “a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. As defined by the Director of Developmental Services, in consultation with the Superintendent of Public Instruction, this term shall include intellectual disability, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with an intellectual disability, but shall not include other handicapping conditions that are solely physical in nature.”

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally

disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The California Department of Developmental Services (DDS) estimates that 30 persons with developmental disabilities were residing in Laguna Woods as of December 2020. All of the individuals with developmental disabilities residing in Laguna Woods were over the age of 18, and the majority of the developmentally disabled individuals in Laguna Woods live in the home of their parent, family, or guardian.

The Regional Center of Orange County is one of 21 regional centers in the State that provides point of entry to services for people with developmental disabilities. The center is a private, nonprofit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

The most obvious housing need for persons with disabilities is housing that is adapted to their needs. Most single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility. Location of housing is also an important factor for many persons with disabilities, as they often rely upon public transportation to travel to necessary services and shops. "Barrier free design" housing, accessibility modifications, proximity to services and transit, and group living opportunities are important in serving this group.

Within Laguna Woods, there are services currently in place tailored to mobility-impaired individuals including private bus services and subsidized taxi service that supplement public transportation options. The City has also adopted a reasonable-accommodations ordinance designed to reduce barriers for special-needs populations.

1.2.3.6 Homelessness

In collaboration with other nonprofit organizations, the Orange County Department of Community Resources is responsible for the countywide biennial point-in-time homeless count. For the purpose of the point-in-time count, the definition of homelessness includes unsheltered individuals and families "with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground." The count of sheltered homeless individuals and families includes those "living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals)" on the night designated for the count.

Based upon the 2019 point-in-time count, there were a total of 6,860 homeless individuals residing within Orange County, with 5 individuals counted in Laguna Woods. All of the homeless individuals within Laguna Woods were unsheltered, as there are no homeless shelters located within Laguna Woods. Since 2013, the homeless population in Orange County has steadily increased, with the largest increase occurring between 2017 and 2019 (43 percent increase). The 2019 Count indicated

that all five of those counted within Laguna Woods were individuals and not part of a family unit experiencing homelessness.

People experiencing homelessness include families and individuals representing every race, age group, and community in Orange County. As the cost of living in Orange County and in all of Southern California continues to rise, and as unemployment remains high, homelessness has become more prevalent.

In the past, several factors have contributed to homelessness, including difficulty in obtaining employment, lack of ongoing care for the mentally ill, substance abuse, and inadequate education. In recent years, however, a shortage of affordable housing opportunities coincident with a growing population of low-income renters has added to the problem.

Residential care facilities, which are facilities for individuals who require 24-hour supervision but who do not generally need medical care beyond routine health checks and medication monitoring, are permitted in Laguna Woods in any district, planned community, or specific plan area zoned for residential uses. The State of California is the authority for licensing, inspection, and enforcement for community care facilities throughout California. The State has preempted local controls over certain types of residential care facilities.

The County of Orange coordinates a comprehensive regional Continuum of Care (CoC) system to address homelessness in Orange County. The CoC is a housing and service delivery system for the homeless and is designed to do the following:

- Promote communitywide commitment to the goal of ending homelessness through regional coordination and collaboration.
- Advocate for funding and resources to end homelessness and provide funding for proven efforts by nonprofit providers, states, and local governments to quickly rehouse people experiencing homelessness, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness.
- Promote access to and effective utilization of mainstream programs by homeless individuals and families.
- Promote implementation of best practices and evidence-based approaches to homeless programming and services.

Other organizations and facilities in nearby or surrounding communities that may provide shelter and services to people experiencing homelessness in Laguna Woods are listed in Table L. It should be noted that some of these facilities prioritize their services to people experiencing homelessness who have a relationship to the cities in which they are located.

Table L: Local Facilities for Persons Experiencing Homelessness

Organization/Facility	Beds and/or Services Provided
Alternative Sleeping Location Emergency Shelter (operated by Friendship Shelter) 20652 Laguna Canyon Rd Laguna Beach, CA 92651 (949) 494-6928	Provides emergency night shelter for up to 45 people, a 30-day rapid housing program, as well as a drop-in day program between the hours of 10:00 a.m. and 1:00 p.m. This organization prioritizes services to those people experiencing homelessness who have a relationship to Laguna Beach.
Bridge Housing Program (operated by Friendship Shelter) PO Box 4252 Laguna Beach, CA 92652 (949) 494-6928	Provides dormitory-style housing for up to 32 people at a time, with all meals, case management, and an array of support services provided. Serves 120-140 individuals annually. This organization also provides a permanent supportive housing program intended for clients who are chronically homeless and are unable to work due to a disability, including physical or mental health conditions. Clients are housed in scattered-site apartments and receive ongoing supportive services from Friendship Shelter staff. This organization prioritizes services to those people experiencing homelessness who have a relationship to Laguna Beach.
Human Options 5540 Trabuco Road Irvine, CA 92620 (949) 737-5242	Provides emergency shelter for individuals or families in domestic violence situations seeking shelter. Serves approximately 350 adults and children annually. Services include individual and group counseling, case management, legal advocacy, and children's programs. Also provides a transitional housing program.
Laura's House 999 Corporate Drive, Suite 225 Ladera Ranch, CA 92694 (949) 361-3775	Provides emergency shelter (52 beds) for up to 45 days for individuals or families in domestic violence situations seeking shelter. Services include individual and group counseling, life skills classes, case management, legal advocacy, and children's programs. Also provides transitional housing for 5-7 families at a time for 3-6 months.
Orange County Rescue Mission One Hope Drive Tustin, CA 92782 (714) 247-4379	Provides transitional, recuperative, and emergency housing for up to 262 homeless men, women, and children. Services include medical and dental care, meals, job training, case management, substance abuse treatment, parent training, anger management training, mental health care assessment and treatment, housing assistance and placement, and life skills training.

Note: Compiled by LSA, 2021. B based on information from <https://www.homelesshelterdirectory.org/> and the individual websites for each service provider.

1.2.3.7 Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through seasonal agricultural work. Farmworkers have special housing needs because they earn lower incomes than many other workers and move throughout the season from one harvest to the next. The 2015–2019 ACS estimates that there are no Laguna Woods residents who hold farming, fishing, or forestry occupations. There is no agriculturally designated land within Laguna Woods.

The United States Department of Agriculture National Agriculture Statistics provide state- and county-level data on hired farm labor across the United States. Within Orange County, a total of 99 farms reportedly hired 1,772 workers in 2017. Permanent workers, those who work 150 days or more, represent the largest category of workers with 1,106 workers (62 percent). A total of 666 workers (38 percent) are considered seasonal and work less than 150 days. Orange County

reported 340 migrant workers (19 percent) with full-time hired labor and 176 unpaid workers in 2017.

Although there are no farmworkers identified within Laguna Woods, the median annual salary for the agriculture, forestry, fishing, hunting, and mining industry in Orange County in 2019 was \$24,592, which is 29 percent of the Orange County median income (\$85,398) and is considered a very low income (2019). Because farmworkers make up no percentage of Laguna Woods' total population, no specific programs for this special-needs group are necessary. Given the limited need to provide for farmworker housing in Orange County, the City's efforts to provide housing at affordable prices to very-low income households should address the needs of permanent and seasonal farmworker populations.

1.3 HOUSING STOCK CHARACTERISTICS

This section identifies the characteristics of Laguna Woods' physical housing stock. This includes an analysis of housing growth trends, housing conditions, housing prices and rents, and housing affordability.

1.3.1 Housing Growth

Table M shows housing production in Laguna Woods, compared to neighboring cities and Orange County as a whole. According to the California Department of Finance, Laguna Woods experienced a slight reduction in housing units between 2000 and 2010. This is in contrast to Orange County, which saw an almost 8 percent increase in housing stock over the same decade. The surrounding communities of Irvine and Lake Forest saw large amounts of new housing construction in the early 2000s.

Table M: Regional Housing Growth Trends

Jurisdiction	Total Housing Units			Percent Change	
	2000	2010	2020	2000–2010	2010–2020
Laguna Woods	13,629	13,079	13,079	-4.0%	0.0%
Aliso Viejo	N/A	18,861	20,192	N/A	7.1%
Irvine	53,711	81,110	108,822	51.0%	34.2%
Laguna Beach	12,965	12,923	13,027	-0.3%	0.8%
Laguna Hills	10,324	10,989	11,298	6.4%	2.8%
Lake Forest	20,486	27,161	30,244	32.6%	11.4%
Orange County	969,484	1,046,118	1,111,421	7.9%	6.2%

Sources: (1) CA Dept. of Finance E-8 Historical Population and Housing Estimates, 2010.

(2) CA Dept. of Finance E-5 Population and Housing Unit Estimates, 2020.

N/A = Not Applicable

The California Department of Finance estimates that in 2020 there were 13,079 housing units within Laguna Woods. This has remained consistent since 2010. The increase in housing stock in Orange County was notably higher at 6 percent. As Laguna Woods is a maturing suburban community with primarily small site and infill development, it is expected that the increase in the housing stock in Laguna Woods would be modest and lower than the countywide rate.

1.3.2 Housing Type and Tenure

Table N presents the mix of housing types in Laguna Woods. The California Department of Finance estimates that of the 13,079 units in Laguna Woods, 4,639 are single-family units (36 percent). Approximately 65 percent of Laguna Woods' housing stock is multifamily units. Laguna Woods also has no mobile home parks within its local housing stock. The composition of Laguna Woods' housing stock has remained relatively unchanged over the last two decades.

Table N: Housing Units by Type (2000–2020)

Unit Type	2000		2010		2020	
	Units	Percent	Units	Percent	Units	Percent
Single-Family (SF) Detached	675	5.3%	918	7.0%	918	7.0%
SF Attached	3,726	29.4%	3,721	28.5%	3,721	28.5%
Total SF	4,401	34.8%	4,639	35.5%	4,639	35.5%
2 to 4 Units	2,298	18.2%	2,237	17.1%	2,237	17.1%
5 or more units	5,934	46.9%	6,203	47.4%	6,203	47.4%
Total Multi-Family	8,232	65.0%	8,440	64.5%	8,440	64.5%
Mobile Homes & Other	15	0.1%	0	0.0%	0	0.0%
Total Housing Units	12,657	100.0%	13,079	100.0%	13,079	100.0%
Vacancy Rate	7.52%	--	11.7%	--	10.8%	--

Sources: (1) U.S. Census Bureau, 2000 and 2010 Census.

(2) CA Dept. of Finance E-5 Population and Housing Unit Estimates, 2020.

Housing tenure refers to whether a housing unit is owned, is rented, or is vacant. Tenure is an important indicator of the housing climate of a community, reflecting the relative cost of housing opportunities and the ability of residents to afford housing. Tenure also influences residential mobility, with owner units generally evidencing lower turnover rates than rental housing. Table O indicates the total number of renter-occupied and owner-occupied housing units in Laguna Woods in 2010 and 2018. The ownership rate within Laguna Woods has declined slightly from 78 percent in 2010 to 74 percent in 2018. However, the homeownership rate continues to be higher than the countywide homeownership rate of 57 percent.

Table O: Housing Tenure (2010 and 2018)

Occupied Housing Units	2010		2018	
	Households	Percent	Households	Percent
Renter	2,523	22.0%	2,851	25.6%
Owner	8,947	78.0%	8,305	74.4%
TOTAL	11,470	100%	11,156	100%

Source: 2010 and 2018 ACS 5-year estimates.

1.3.3 Vacancy Rate

A vacancy rate measures the overall housing availability in a community and is often a good indicator of how efficiently for-sale and rental housing units are meeting the current demand for housing. A vacancy rate of 5 percent for rental housing and 2 percent for ownership housing is generally considered healthy and suggests that there is a balance between the demand and supply of housing. A lower vacancy rate may indicate that households are having difficulty in finding

housing that is affordable, leading to overcrowding or households having to pay more than they can afford. A low vacancy rate or a particularly tight housing market may also lead to high competition for units, raising rental and housing prices substantially.

The 2014–2018 ACS estimated that the vacancy rate for owner-occupied units was 2.3 percent, and the rental vacancy rate was 5.9 percent. These vacancy rates suggest a relatively healthy housing market for both residents looking to purchase a home and renters.

1.3.4 Housing Age and Condition

The age of a community's housing stock can provide an indicator of overall housing conditions. Typically, housing over 30 years in age is likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work, and other repairs. Table P displays the age of occupied housing stock by tenure as of 2018. Over two-thirds of Laguna Woods' housing stock was built between 1960 and 1979. Of Laguna Woods' current housing stock, approximately 98 percent will be over 30 years old by the end of the 2021 to 2029 planning cycle. As a built-out community, Laguna Woods has a low proportion of newer units, with less than 0.8 percent built since 2000.

Table P: Age of Housing Stock (2019)

Year Structure Built	Renter-Occupied Units		Owner-Occupied Units		Total Occupied Units	
	Number	Percent	Number	Percent	Number	Percent
2010 or later	12	0.4%	0	0.0%	12	0.1%
2000-2009	58	2.0%	14	0.2%	72	0.7%
1980-1999	377	12.9%	391	4.8%	768	7.0%
1960-1979	2,229	76.1%	6,874	85.1%	9,103	82.7%
1940-1959	254	8.7%	718	8.9%	972	8.8%
1939 or earlier	0	0.0%	76	0.9%	76	0.7%
Total	2,930	100.0%	8,073	100.0%	11,003	100.0%

Source: 2019 ACS 5-year estimates.

A greater proportion of rental housing (12.9 percent) was constructed between 1980 and 1999, when compared to owner-occupied housing (4.8 percent). Conversely, a greater proportion of owner-occupied housing was constructed between 1960 and 1979 (85 percent), compared to renter-occupied housing (82 percent).

The City's code enforcement services provider indicated that the City opened 88 cases in 2019 and 123 cases in 2020, the majority of which related to commercial properties (87.5 percent in 2019 and 86.9 percent in 2020). The City's code enforcement services provider conducted a windshield survey in early October 2021 of all residential units within Laguna Woods to identify housing units with visible signs of damage or disrepair (e.g., deteriorated roofs, stucco damage, and broken or deteriorated windows) in an effort to estimate the number of housing units that are in need of rehabilitation and replacement. The windshield survey identified only five locations with minor maintenance issues, including minor wood rot, minor water damage on an exterior wall, and a crack at the top of a window. Given the small number of code enforcement cases and limited extent of the issues identified in the windshield survey, it is reasonable to conclude that Laguna Woods is a generally well-maintained community. Most of the City's housing stock is located within actively

managed communities with boards or associations and on-site property management that ensure adequate maintenance. Consequently, there are few violations or complaints related to residential properties that require City intervention.

Due to Laguna Woods' relative lack of substandard housing and health and safety code violations, the City does not require any specialized code enforcement programs (e.g., occupancy inspection, rental inspection, or neighborhood enhancement). Nevertheless, the Housing Element includes a program for the City to 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. As the name suggests, this effort is meant to be proactive to help promote the good condition and upkeep of Laguna Woods' housing stock.

1.3.5 Housing Costs and Affordability

The cost of housing is directly related to the extent of housing problems in a community. If housing costs are relatively high in comparison to household income, there will be a higher prevalence of overpayment and overcrowding. This section summarizes the cost and affordability of the housing stock to Laguna Woods residents.

1.3.5.1 Rental Housing Market

According to the 2014–2018 ACS, the rental vacancy rate in Laguna Woods was 5.9 percent, indicating a tight rental market in Laguna Woods. A point-in-time survey of available rental units within Laguna Woods listed on Zillow and Apartments.com was conducted in early April 2021. While not comprehensive, it provides a snapshot of the types of units available, as well as typical market rents. Table Q includes the results of the survey by number of bedrooms.

**Table Q: Median and Average Market Rents by Number of Bedrooms
(April 2021)**

Number of Bedrooms	Units Advertised	Rent Range	Average Rent	Median Rent
0	2	\$2,320-\$2,520	\$2,420	\$2,420
1	16	\$1,550-\$2,700	\$2,039	\$1,825
2	58	\$2,150-\$3,950	\$2,378	\$2,200
3	5	\$2,400-\$3,950	\$2,964	\$2,895
All Units	81	\$1,550-\$3,950	\$2,349	\$2,200

Source: Zillow.com and Apartments.com, accessed April 9, 2021.

A total of 81 units were listed for rent, with a median rent of \$2,200. Two-bedroom units were the most prevalently available in Laguna Woods, with rents ranging from \$2,150 to \$3,950 and a median rent of \$2,200.

1.3.5.2 Homeownership Market

Table R shows median home sale prices over 2 years for Laguna Woods and nearby communities. The February 2021 median home sales price in Laguna Woods represented a 14.5 percent decrease from February 2020. In contrast, Orange County as a whole experienced an increase in median sales prices during that time period, and many neighboring jurisdictions also saw only slight to moderate increases. With the exception of Laguna Woods, all of the communities listed experienced an increase in home sale prices between February 2020 and February 2021, with Aliso Viejo and Laguna Beach seeing double-digit increases. In February 2021, the median home sales price for Laguna Woods was \$325,000, representing a decrease of over 14 percent from February 2020. Given that this price decline is somewhat anomalous in comparison to other nearby cities, it may be tied to the severe impacts that the COVID-19 pandemic has had on the senior population.

Table R: Annual Median Home Prices (2020–2021)

Jurisdiction	February 2020 Median Sales Price	February 2021 Median Sales Price	Percent Change 2020-2021
Laguna Woods	\$380,000	\$325,000	-14.5%
Aliso Viejo	\$545,000	\$675,000	23.9%
Irvine	\$871,500	\$900,000	3.3%
Laguna Beach	\$1,972,500	\$2,230,000	13.1%
Laguna Hills	\$785,000	\$813,000	3.6%
Lake Forest	\$742,000	\$789,000	6.3%
Orange County	\$748,500	\$820,000	9.6%

Source: Corelogic.com, California Home Sale Activity by City, February 2021.

1.3.5.3 Housing Affordability

The affordability of housing in Laguna Woods can be assessed by comparing market rents and sales prices with the amount that households of different income levels can afford to pay for housing. Compared together, this information can reveal who can afford what size and type of housing as well as indicate the types of households that would most likely experience overcrowding or overpayment.

Table S provides estimates of affordable rents and home prices based on HCD's 2021 income limits for Orange County; current mortgage rates (i.e., 3.0 percent for a 30-year fixed-rate mortgage); and cost assumptions for utilities, taxes, and insurance.

Based on the housing costs presented earlier in Table R, Laguna Woods residents with lower incomes are unable to afford purchasing a home in Laguna Woods. Additionally, based on the overall median rent presented in Table Q, affordable rentals for lower-income households are difficult to find in Laguna Woods.

Extremely Low-Income Households. Extremely low-income households earn 30 percent or less of the AMI. Based on the assumptions utilized for Table S, the affordable home price for an extremely low-income household ranges from \$66,158 for a five-person household to \$79,721 for a two-person household; therefore, homeownership is out of reach for Laguna Woods residents within this income category. Affordable rents for extremely low-income households range from \$507 to \$637

Table S: Estimated Affordable Housing Price by Income and Household Size (2021)

	Annual Income Limits	Affordable Monthly Housing Cost	Utility Allowance (2020)	Taxes, Insurance and HOA	Affordable Home Price	Affordable Rent
Extremely Low Income (0–30% AMI)						
1-Person (studio)	\$28,250	\$706	\$199	\$247	\$68,591	\$507
2-Person (1 bedroom)	\$32,300	\$808	\$222	\$283	\$79,721	\$586
3-Person (2 bedroom)	\$36,350	\$909	\$293	\$318	\$78,471	\$616
4 Person (3 bedroom)	\$40,350	\$1,009	\$372	\$353	\$74,783	\$637
5 Person (4 bedroom)	\$43,600	\$1,090	\$457	\$382	\$66,158	\$633
Very Low Income (30–50% AMI)						
1-Person	\$47,100	\$1,178	\$199	\$412	\$149,297	\$979
2-Person	\$53,800	\$1,345	\$222	\$471	\$171,829	\$1,123
3-Person	\$60,550	\$1,514	\$293	\$530	\$182,043	\$1,221
4 Person	\$67,250	\$1,681	\$372	\$588	\$190,080	\$1,309
5 Person	\$72,650	\$1,816	\$457	\$636	\$190,607	\$1,359
Low Income (50–80% AMI)						
1-Person	\$75,300	\$1,883	\$199	\$659	\$270,000	\$1,684
2-Person	\$86,050	\$2,151	\$222	\$753	\$309,992	\$1,929
3-Person	\$96,800	\$2,420	\$293	\$847	\$337,335	\$2,127
4 Person	\$107,550	\$2,689	\$372	\$941	\$362,569	\$2,317
5 Person	\$116,200	\$2,905	\$457	\$1,017	\$377,130	\$2,448
Median Income (80–100% AMI)						
1-Person	\$74,700	\$1,868	\$199	\$654	\$267,365	\$1,669
2-Person	\$85,350	\$2,134	\$222	\$747	\$306,962	\$1,912
3-Person	\$96,050	\$2,401	\$293	\$840	\$334,238	\$2,108
4 Person	\$106,700	\$2,668	\$372	\$934	\$358,814	\$2,296
5 Person	\$115,250	\$2,881	\$457	\$1,008	\$373,243	\$2,424
Moderate Income (100–120% AMI)						
1-Person	\$89,650	\$2,241	\$199	\$784	\$331,604	\$2,042
2-Person	\$102,450	\$2,561	\$222	\$896	\$380,359	\$2,339
3-Person	\$115,250	\$2,881	\$293	\$1,008	\$416,465	\$2,588
4 Person	\$128,050	\$3,201	\$372	\$1,120	\$450,462	\$2,829
5 Person	\$138,300	\$3,458	\$457	\$1,210	\$471,875	\$3,001

Sources: (1) HCD, 2021;

(2) Orange County Housing Authority Utility Allowance Schedule, December 2020;

(3) LSA Associates, Inc., 2021.

Assumptions: 2021 HCD income limits; 30.0% gross household income as affordable housing cost; 35.0% of monthly affordable cost for taxes and insurance, 10% down payment; and 3.0% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on Orange County Housing and Community Development Utility Allowance Schedule.

AMI = Annual Median Income

HOA = Homeowners Association

per month. Based on the median rents presented in Table Q, even one-bedroom units are unaffordable for all extremely low-income households. Severe overpayment or overcrowding may occur as a result of the gap between market costs and affordability.

Very Low-Income Households. Very low-income households earn between 30 percent and 50 percent of the AMI. Very low-income households can afford between \$979 and \$1,359 on monthly rent, depending on household size. However, based on the market rents presented in Table Q, rental units of any size in Laguna Woods would require a very low-income household to pay over the

affordability threshold of 30 percent. Home ownership is also unaffordable for very low-income households in Laguna Woods, with affordable home prices for this income category ranging from \$149,297 to \$190,607, well below Laguna Woods' median home sales price of \$325,000 in February 2021.

Low-Income Households. Low-income households earn between 50 and 80 percent of the AMI. Depending on household size, a low-income household can afford monthly rent between \$1,684 and \$2,448. Based on the market rents in listed Table Q, low-income households would generally be able to afford some one-bedroom units in Laguna Woods. However, larger rental units are still unaffordable for this income category, which may result in overpayment or overcrowding due to larger families renting smaller units. Based on Table S, low-income households can afford home sale prices between \$270,000 and \$377,130. Therefore, homeownership remains largely out of reach for this income group when compared with Laguna Woods' median home sales price as low-income households may only be able to afford the purchase of a small home.

Median-Income Households. Median-income households earn between 80 and 100 percent of the AMI. Median-income households can afford to purchase a home with a purchase price ranging from \$267,365 to \$373,243. With Laguna Woods' median home sales price at \$325,000 in February 2021, homeownership is affordable for median-income households seeking a smaller home. Median-income households can afford a monthly rent payment ranging from \$1,669 for a one-person household to \$2,424 for a five-person household. Based on median market rents within Laguna Woods, median-income households can generally afford one- and two-bedroom rental units, and larger households may be able to afford some lower-priced three-bedroom units. However, four- and five-person households may be overcrowded into smaller units or overpay to afford an appropriately sized unit.

Moderate-Income Households. Moderate-income households earn 100 to 120 percent of the AMI. Moderate-income households can afford a home sales price ranging from \$331,604 to \$471,875. Therefore, with the median home sales price in Laguna Woods at \$325,000 in February 2021, homeownership is affordable to households with moderate incomes. Moderate-income households can afford monthly rent from \$2,042 for a one-person household to \$3,001 for a five-person household. Based on the market rents presented in Table Q, moderate-income households can generally afford one-, two-, and three-bedroom units within Laguna Woods.

1.3.6 Assisted Housing at Risk of Conversion

State Housing Element law requires an analysis of the potential for currently rent-restricted low-income housing units to convert to market rate housing and to propose programs to preserve or replace any units "at risk" of conversion. This section presents an inventory of all assisted rental housing in Laguna Woods and evaluates those units at risk of conversion during the 8-year 2021 to 2029 planning period.

1.3.6.1 Assisted Housing Inventory

Laguna Woods contains one development of assisted multifamily rental housing with 17 affordable units, as presented in Table T. This inventory includes all multifamily rental units assisted under federal, State, and local programs, including HUD, State/local bond programs, density bonus, inclusionary, and local direct assistance programs. As no units within Laguna Woods are at risk of conversion to market rate units in 10 years or less, an analysis has not been conducted to evaluate the replacement value, qualified entities to manage such a project, or potential funding sources for at-risk units.

Table T: Inventory of Subsidized Rental Housing for Lower Income Households

Project Name	Tenant Type	Total Units	Affordable Units	Applicable Programs	Potential Conversion Date
Not At-Risk					
San Sebastian	Senior	134	17	Density Bonus	October 16, 2054
Total		134	17		

1.3.7 Existing Housing Needs

1.3.7.1 Overpayment

Overpayment remains a critical issue for many Laguna Woods residents, particularly renters and lower-income households. Affordability problems occur when housing costs become so high in relation to income that households have to pay an excessive proportion of their income for housing. According to the metric utilized by HUD, a household is cost burdened if housing costs (including utilities) exceed 30 percent of gross household income. Severe cost burden occurs when housing costs exceed 50 percent of gross income.

Table U indicates the number of cost-burdened households within Laguna Woods by tenure. As shown in Table U, overpayment impacts 70 percent of renter households and nearly 41 percent of owner households. More renter households are also impacted by severe cost burden (45 percent), compared to owner households (22 percent).

Table U: Cost Burden by Tenure

	Renter Households		Owner Households		Total Households	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
With Cost Burden >30%	1,885	70.1%	3,475	40.6%	5,360	47.6%
With Cost Burden >50%	1,210	45.0%	1,875	21.9%	3,085	27.4%
Total	2,690	100.0%	8,560	100.0%	11,250	100.0%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2017 ACS 5-year estimates.

ACS = American Community Survey

HUD = United States Department of Housing and Urban Development

Table V provides more detailed information on cost burden by income group, tenure, and household type. Overall, cost burden tends to impact proportionately more senior renters than senior homeowners, with the exception of low-income senior renters. Rates of overpayment for small families who rent were 100 percent in the very low and low-income categories. Extremely low-income small-family households who own their own homes are also heavily impacted, with 97 percent experiencing a cost burden and 83 percent experiencing a severe cost burden. As described earlier, Laguna Woods has very few large-family households. Of the few large-family households in Laguna Woods, none are affected by a high cost burden.

Table V: Cost Burden by Income Level, Tenure, and Household Type

Income Group	Cost Burden	Seniors			Small Family			Large Family		
		>30%	>50%	Total	>30%	>50%	Total	>30%	>50%	Total
Extremely Low (≤ 30% HAMFI ²)	Owner	79%	69%	1865	97%	83%	30	0%	0%	0
	Renter	87%	86%	800	0%	0%	0	0%	0%	0
Very Low (31-50% HAMFI)	Owner	52%	16%	1750	0%	0%	0	0%	0%	0
	Renter	77%	57%	635	100%	100%	4	0%	0%	0
Low (51-80% HAMFI)	Owner	25%	6%	1780	0%	0%	50	0%	0%	0
	Renter	85%	19%	455	100%	0%	20	0%	0%	0
Moderate (81-100% HAMFI)	Owner	15%	3%	965	13%	0%	75	0%	0%	0
	Renter	65%	0%	200	0%	0%	15	0%	0%	0
Above Moderate (>100% HAMFI)	Owner	3%	0%	1580	0%	0%	105	0%	0%	0
	Renter	3%	0%	375	0%	0%	15	0%	0%	0

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2017 ACS 5-year estimates.

¹ Data presented in this table are based on special tabulations from the ACS data. Due to the small sample size, the margins for error can be significant. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.

² HAMFI = HUD Area Median Family Income

ACS = American Community Survey

HUD = United States Department of Housing and Urban Development

1.3.7.2 Overcrowding

The United States Census defines overcrowding as an average of more than one person per room in a housing unit, including the living and dining room but excluding kitchens, bathrooms, and hallways. Severe overcrowding occurs when a unit is occupied by more than 1.5 persons per room. The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding can also occur when housing costs are high in relation to income and families are forced to live together in order to pool income to pay the rent or mortgage. Table W shows the incidence of overcrowding in Laguna Woods by tenure, as estimated by the 2014–2018 ACS.

Table W: Overcrowding by Tenure

Overcrowding	Laguna Woods		Orange County	
	Number	Percent of Total	Number	Percent of Total
Owner Occupied Units	8,305	100.0%	592,269	100.0%
Not Overcrowded (1.00 or Less Occupants/Room)	8,292	99.8%	570,469	96.3%
Overcrowded				
1.01 to 1.50 Occupants/Room	0	0.0%	15,731	2.7%
1.51 or More Occupants/Room	13	0.2%	6,069	1.0%
Renter Occupied Units	2,851	100.0%	440,104	100.0%
Not Overcrowded (1.00 or Less Occupants/Room)	2,851	100.0%	370,391	84.2%
Overcrowded				
1.01 to 1.50 Occupants/Room	0	0.0%	43,900	10.0%
1.51 or More Occupants/Room	0	0.0%	25,813	5.9%
Total Overcrowded	13	0.1%	91,513	8.9%

Source: 2018 ACS 5-year estimates.

As shown in Table W, an estimated total of 13 households experienced overcrowding in Laguna Woods in 2018, representing just under 0.1 percent of all households in Laguna Woods. Countywide, approximately 9 percent of households experienced overcrowded conditions. All 13 of the households in Laguna Woods that experience overcrowding are in the severe overcrowding category.

1.3.7.3 Displacement and Disproportionate Housing Needs

Using the Urban Displacement Project's Gentrification and Displacement maps, the westernmost areas of Laguna Woods fall into the following displacement typologies:³

- Stable/advanced exclusive (with risk factors of being susceptible to rent change);
- Stable moderate/mixed-income (with risk factors of being located in an area that is susceptible to rent change, has a rent gap, and is a hot market); and
- Low-income/susceptible to displacement (with risk factors of being mostly low income, being located in an area that is susceptible to rent change, has a rent gap, and is a hot market).

The eastern and southernmost areas fall into the following displacement typologies:

- At risk of becoming exclusive (with risk factors of being located in an area that is susceptible to rent change and that has a rent gap, and is a hot market);
- Low-income/susceptible to displacement (with risk factors of being mostly low income, being located in an area that is susceptible to rent change, has a rent gap, and is a hot market); and
- Ongoing displacement (with risk factors of being mostly low income, being located in an area that is susceptible to rent change, has a rent gap, and is a hot market).

³ Los Angeles – Gentrification and Displacement. *Urban Displacement Project*. Website: <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/> (accessed October 1, 2021).

Job displacement risk varies throughout Laguna Woods, with the lowest rate being 5.2 percent in central Laguna Woods, and the highest rate being 23.8 percent in the easternmost part of Laguna Woods.

In summary, although the majority of Laguna Woods has a low risk of displacement, certain sections of Laguna Woods, particularly the eastern and southernmost areas, and specifically Census Tract 626.46, are either susceptible to displacement or experiencing ongoing displacement, as well as at risk for job displacement.

1.4 AFFIRMATIVELY FURTHERING FAIR HOUSING

In January 2019, Assembly Bill (AB) 686 introduced an obligation to affirmatively further fair housing (AFFH) into California State law. AB 686 defined “affirmatively further fair housing” to mean “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” for persons of color, persons with disabilities, and other protected classes. AB 686 added an assessment of fair housing to the Housing Element that includes the following components: a summary of fair housing issues and assessment of local fair housing enforcement and outreach capacity, an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

To assist in this analysis, 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 the fair housing goals (as defined by HCD).” The California Fair Housing Task Force has created opportunity maps 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% Low Income Housing Tax Credits (LIHTCs).” These opportunity maps are made from composite scores of four different domains made up of a set of indicators. Table X shows the full list of indicators.

Table X: 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, Methodology for the 2020 TCAC/HCD Opportunity Maps, June 2020.

1.4.1 Fair Housing Issues

1.4.1.1 Discrimination

The Fair Housing Council of Orange County (FHCOC) works to ensure equal access to housing opportunities and elimination of housing discrimination by providing services throughout Orange County including community education, individual counseling, mediation, and low-cost advocacy. Questions received by the City regarding potential housing discrimination are referred to the FHCOC. The City does not have a record of the number of issues or complaints within Laguna Woods that the FHCOC has addressed.

According to HUD's Fair Housing Enforcement and Outreach (FHEO) Inquiries by City data (found in the Fair Housing Enforcement and Outreach Capacity data layer on HCD's AFFH Data Viewer), Laguna Woods had 0.24 inquiries per 1,000 people between 2013 and 2021. This ratio is slightly higher than the adjacent cities of Laguna Beach (0.17), and Laguna Hills (0.16), but lower than the cities of Irvine (0.28) and Aliso Viejo (0.37). Of the four complaints during this period, two were found to have no valid basis or issue and two were not resolved due to a failure to respond. None of the complaints appear to be associated with discrimination due to disability, race, familial status, national origin, religion, sex, or color.

1.4.1.2 Patterns of Segregation and Minority Concentrations

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. According to the California Fair Housing Task Force Opportunity Maps, none of the census tracts within Laguna Woods are designated as areas with high segregation and poverty.

According to HUD, the definition of a racially/ethnically concentrated area of poverty (R/ECAP) involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold states that R/ECAPs must have a non-white population of 50 percent or more, and the poverty threshold states that a neighborhood can be identified as a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average poverty rate for the various census tracts in the metropolitan/micropolitan area, whichever threshold is lower.

As Table F in Exhibit C depicts, Laguna Woods does not include any neighborhoods that meet the poverty test because the percentage of residents living below the federal poverty threshold is 15.7 percent or lower in each of Laguna Woods' census tracts. Table Y provides data regarding race, ethnicity, and median household income in Orange County, Laguna Woods, and each of the eight census tracts that are partially or entirely within Laguna Woods.

Table Y: Racial/Ethnic Concentrations and Income Levels

Jurisdiction	White ¹	Black or African American ¹	American Indian and Alaska Native ¹	Asian ¹	Native Hawaiian and Pacific Islander ¹	Some other Race ¹	Hispanic or Latino (of any race) ¹	Median Household Income ²
Orange County	64.5%	2.4%	1.1%	22.8%	0.7%	12.8%	34.1%	\$90,234
Laguna Woods	77.4%	0.7%	0.5%	20.6%	0.1%	2.0%	5.8%	\$44,020
Census Tract 626.21	66.7%	3.1%	0.3%	33.3%	0.0%	2.2%	12.6%	\$111,425
Census Tract 626.22	79.0%	0.4%	0.0%	20.0%	0.4%	1.6%	7.9%	\$44,119
Census Tract 626.25	67.4%	1.1%	0.3%	16.4%	0.5%	19.2%	32.5%	\$45,214
Census Tract 626.41	68.1%	1.7%	2.6%	20.7%	0.0%	12.1%	22.0%	\$88,986
Census Tract 626.46	74.3%	2.9%	0.5%	20.1%	0.0%	3.6%	7.0%	\$41,875
Census Tract 626.47	67.7%	3.7%	0.3%	17.3%	0.0%	11.2%	21.8%	\$54,327
Census Tract 626.48	76.8%	0.0%	1.6%	20.4%	0.0%	3.1%	4.2%	\$45,000
Census Tract 626.49	81.0%	0.0%	0.0%	18.9%	0.0%	1.7%	11.8%	\$60,254

¹ American Community Survey, 2019 5-Year Estimates. Table DP05.² American Community Survey, 2019 5-Year Estimates. Table S1901.

As Table Y indicates, the White population is the largest race/ethnic group in each of the census tracts in Laguna Woods. There is also a large Asian population that is uniformly present in each of Laguna Woods' eight census tracts, with a slightly larger percentage of Asians (33.3 percent) present in Census Tract 626.21. As shown in Table Y, the median household income in Census Tract 626.21 (\$111,425) is substantially higher than Laguna Woods overall. The only census tracts with slightly outlying ethnic compositions are Census Tracts 626.41 and 626.47, where 22.0 percent and 21.8 percent of the population is Hispanic or Latino (of any race), respectively. However, it should be noted that the median household income in these two census tracts is higher than Laguna Woods overall, suggesting that these areas are slightly more affluent than others. This information points to the absence of R/ECAPs in Laguna Woods.

1.4.1.3 Access to Opportunities

Table Z shows the California Fair Housing Task Force Opportunity Map composite scores, domain scores, and categorization for all eight of the census tracts that are partially or entirely within Laguna Woods. The majority of the census tracts within Laguna Woods are categorized as Low Resource areas. There are three census tracts within Laguna Woods that are categorized as Moderate Resource areas (of these, two are "Rapidly Changing") and one census tract (Census Tract 626.49) is categorized as a High Resource area. Census Tract 626.49 is located in the westernmost portion of Laguna Woods (west of Avenida Sosiega) adjacent to the Woods End Wilderness Preserve.

Table Z: Opportunity Map Scores and Categorization (2020)

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final Category
626.21	0.74	0.516	0.38	0.029	Moderate Resource (Rapidly Changing)
626.22	0.005	0.542	0.203	-0.63	Low Resource
626.25	0.132	0.787	0.503	-0.064	Moderate Resource
626.41	0.598	0.821	0.442	0.144	Moderate Resource (Rapidly Changing)
626.46	0.021	0.799	0.291	-0.423	Low Resource
626.47	0.127	0.511	0.343	-0.335	Low Resource
626.48	0.002	0.925	0.388	-0.439	Low Resource
626.49	0.34	0.882	0.7	0.283	High Resource

Source: California Fair Housing Task Force, TCAC/HCD Opportunity Maps, 2020 Statewide Summary Table.

Access to high-quality public transportation can also be looked at as an indicator of access to opportunities. AllTransit is a database created by the Center for Neighborhood Technology to explore metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. AllTransit's overall evaluation was that Laguna Woods had a low combination of trips per week and number of accessible jobs, enabling few people to take transit to work. Specifically, while the vast majority of jobs within Laguna Woods are located within 0.5 mile of transit and Laguna Woods residents can access over 90,000 jobs within a 30-minute transit commute, the transit quality within Laguna Woods is low. There are only four transit routes within Laguna Woods, and none of them offer high-frequency service as defined by AllTransit, making commuting by means of public transportation difficult.

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution, called the California Communities Environmental Health Screening Tool (CalEnviroScreen). High-scoring communities tend to be more burdened by pollution from multiple sources and most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status. Scores for census tracts within Laguna Woods are listed in Table AA. Scores for Laguna Woods range between 4.81 and 28.08, which are relatively low. The highest-scoring area within Laguna Woods is the census tract on the southeast side of Laguna Woods near Interstate 5 (Census Tract 626.47).

Table AA: CalEnviroScreen Scores by Census Tract (2020)

Census Tract	CalEnviroScreen Score	CalEnviroScreen Percentile
626.21	6.37	21
626.22	15.18	37
626.25	12.47	37
626.41	4.81	18
626.46	18.9	44
626.47	28.08	54
626.48	10.56	32
626.49	6.30	22

Source: CA Office of Environmental Health Hazard Assessment (OEHHA), CalEnviroScreen 4.0 Draft.

1.5 REGIONAL HOUSING NEEDS

State law requires all regional councils of governments to determine the existing and projected housing need for its region and determine the portion allocated to each jurisdiction. This is known as the RHNA process. State Housing Element law requires that each city and county develop local housing programs to meet its “fair share” of existing and future housing needs for all income groups, as determined by the jurisdiction’s Council of Governments. This fair-share allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs not only of its resident population but also for the jurisdiction’s projected share of regional housing growth across all income categories. Regional growth needs are defined as the number of units that would have to be added in each jurisdiction to accommodate the forecasted number of households, as well as the number of units that would have to be added to compensate for anticipated demolitions and changes to achieve an “ideal” vacancy rate.

In the six-county Southern California region, which includes Laguna Woods, the agency responsible for assigning these regional housing needs to each jurisdiction is SCAG. The regional growth allocation process begins with the California Department of Finance’s projection of statewide housing demand for a 5-year planning period, which is then apportioned by HCD among each of the State’s official regions. SCAG has determined the projected housing need for its region for the 2021 to 2029 Housing Element cycle and has allocated this housing need to each jurisdiction by income category through the RHNA process. The RHNA represents the minimum number of housing units each community is required to provide “adequate sites” for through zoning, and is one of the primary threshold criteria necessary to achieve HCD certification of the Housing Element.

In allocating the region’s future housing needs to jurisdictions, SCAG is required to take the following factors into consideration:

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

As defined by the RHNA process, Laguna Woods’ new construction need for the 2021 to 2029 planning period has been established at 997 new units, distributed among the four income categories as shown in Table AB. Of the 127 Very Low Income units included in the City’s RHNA, approximately 50 percent (or 63 units) should be made available to Extremely Low Income households. The City will continue to provide sites for a mix of single-family, multifamily and mixed-use housing, supported by a variety of programs to enhance affordability, to accommodate its RHNA and contribute toward addressing the growing demand for housing in the Southern California region.

Table AB: Regional Housing Needs Assessment, 2021–2029

Income Level	Number of Units	Percent of Total RHNA
Very Low* (<50% of AMI)	127	12.7%
Low (50-80% of AMI)	136	13.6%
Moderate (80-120% of AMI)	192	19.3%
Above Moderate (>120% of AMI)	542	54.4%
Total	997	100%

* Based on current household income data presented in Table G, the City estimates that 63 (or approximately 50 percent) of the 127 units included in its Very Low Income allocation should be made available to Extremely Low Income households.

AMI = Annual Median Income

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EXHIBIT B
CONSTRAINTS ANALYSIS

CITY OF LAGUNA WOODS

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LSA

January 2022

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CONSTRAINTS ANALYSIS

CITY OF LAGUNA WOODS

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January 2022

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LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
ADA	Americans with Disabilities Act
ADU	accessory dwelling unit
CBC	California Building Code
CC	Community Commercial
CEQA	California Environmental Quality Act
CF-P	Community Facilities—Private
CF-PI	Community Facilities—Public/Institutional
CIP	Capital Improvement Program
City	City of Laguna Woods
CUP	Conditional Use Permit
ETWD	El Toro Water District
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
ft	foot/feet
HMDA	Home Mortgage Disclosure Act
Lanterman Act	Lanterman Developmental Disabilities Services Act
OCTA	Orange County Transportation Authority
RC	Residential Community
RT	Residential Towers
SB	Senate Bill
sf	square foot/feet
SFHA	Special Flood Hazard Area
SRO	Single Room Occupancy
UWMP	Urban Water Management Plan
WRP	Water Recycling Plant

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1.0 HOUSING CONSTRAINTS

The City of Laguna Woods' (City) Housing Element seeks to ensure the provision of adequate housing to meet the existing and projected needs of all economic segments of the community. Many factors, including market mechanisms, government regulations and policies, and infrastructure and environmental constraints, can constrain the development, maintenance, and improvement of housing. This Constraints Analysis addresses the potential and actual governmental constraints upon the development, maintenance, or improvement of housing that may affect the supply and cost of housing in Laguna Woods, as required by Government Code Section 65583(a).¹

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¹ California Department of Housing and Community Development. 2021. Codes and Enforcement of Onsite/ Offsite Improvement Standards. Website: <https://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml> (accessed June 11, 2021).

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2.0 GOVERNMENTAL CONSTRAINTS

Actions or policies of governmental agencies, whether involved directly or indirectly in the housing market, can impact the ability of the development community to provide adequate housing to meet consumer demands. For example, the impact of federal monetary policies and the budgeting and funding policies of governmental agencies can either stimulate or depress various aspects of the housing industry. State and local government compliance, and the enactment of sanctions for noncompliance, with federal laws may also have an impact on the housing industry.

State and local government compliance with State laws can complicate the development of housing. Statutes such as the California Environmental Quality Act (CEQA) and rezoning and General Plan amendment procedures required by the Government Code can prolong the review and approval of development proposals by local governments. In many instances, compliance with such mandates includes time constraints that cannot be altered by local governments.

City policies can also impact the price and availability of housing. Land use controls, site improvement requirements, building codes, fees, and other local programs to improve the overall quality of housing may serve as constraints to housing development.

2.1 LAND USE CONTROLS

The City's General Plan and Zoning Code provide for a range of residential land use designations and zoning districts. The City's Zoning Map is included as Figure 1. Land use designations that allow for residential development are presented in Table A.

Table A: Residential Land Use Designations

General Plan Land Use Designation	Max. Density	Description
Low Density Residential	<10 du/ac	Includes all dwelling units equipped for independent living (i.e., kitchen, bathroom, and sleeping quarters). Facilities intended for transient living, such as hotels and motels and hospitals and skilled nursing units, are not typically included.
Medium Density Residential	10–12 du/ac	
High Density Residential	13–35 du/ac	
Residential Community	<10 du/ac or 10–12 du/ac depending on location	Encompasses nearly all of the Laguna Woods Village planned residential community with the exception of Rossmoor Towers. Integrates a mix of single-family detached, single-family attached, two family, and multi-family residential, with supporting country clubs, parks, community services, local-serving noncommercial services, and open spaces. Common areas are managed by private nonprofit community associations.

Source: Land Use Element (City of Laguna Woods 2017).

du/ac= dwelling unit(s) per acre

max. = maximum

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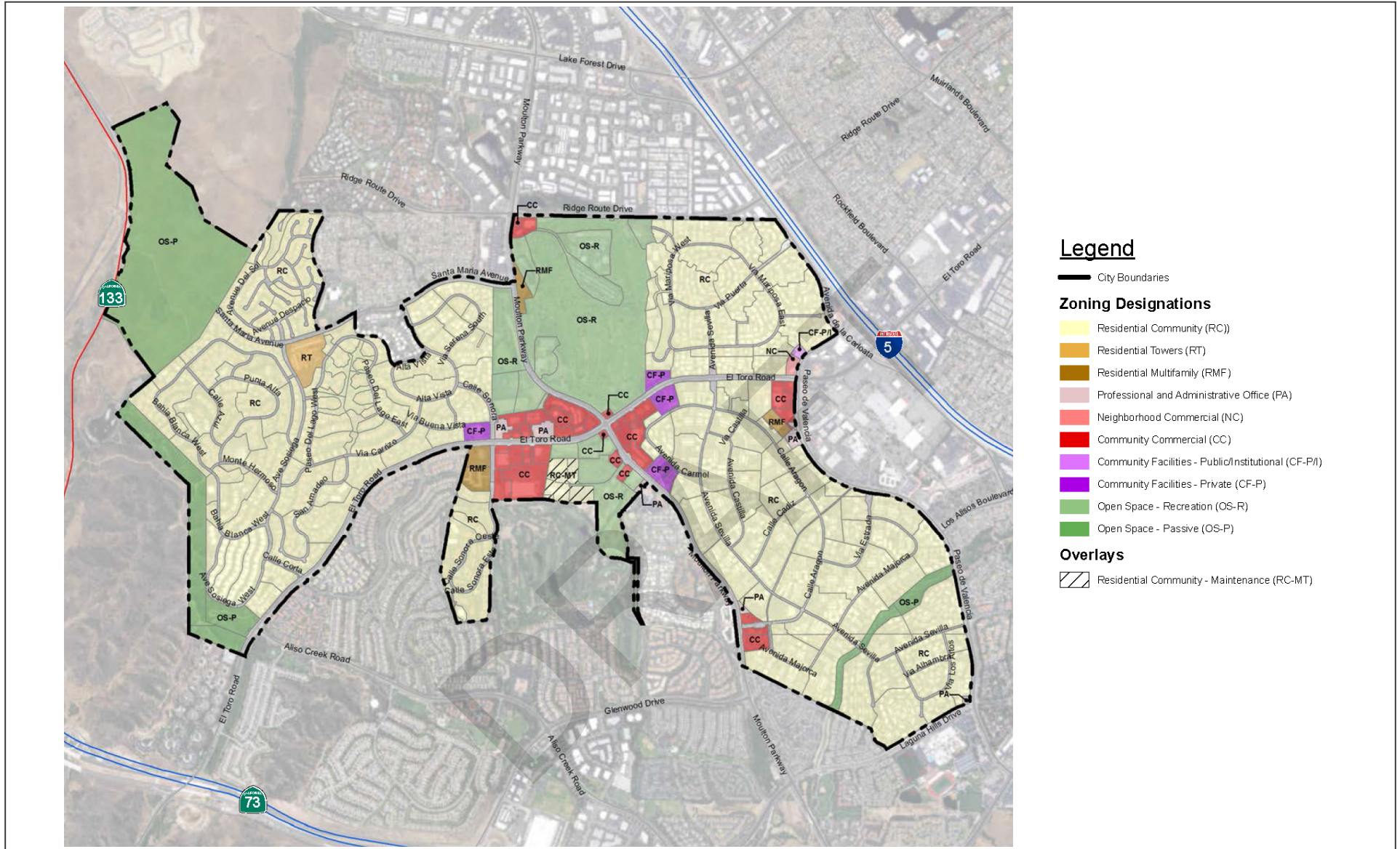
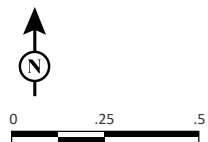


FIGURE 1

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SOURCE: City of Laguna Woods

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Laguna Woods Constraints Analysis

Zoning Map

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2.2 RESIDENTIAL DEVELOPMENT STANDARDS

The City's Zoning Code contains development standards for each zoning district consistent with the land use designations of the General Plan. The Zoning Code establishes development standards for each zoning district to ensure quality development and reduce the potential for land use conflicts. Residential development standards are summarized in Table B.

Table B: Residential Development Standards

Development Standard	Residential Multifamily (RMF)	Residential Community (RC)	Residential Towers (RT)
Maximum Building Height (ft)	65	40	None
Minimum Building Site Area (sf)	7,200	None	None
Minimum Area per Unit (sf)	1,000 ¹	None ²	None ²
Minimum Setback (ft)			
Front Yard	20	None ³	None
Side Yard from ROW	5	None ³	None
Rear Yard from ROW	25	None ³	None
Side Yard not abutting ROW	5	None ³	None
Rear Yard not abutting ROW	25 ⁴	None ³	None
Distance between Principal Structures (ft)	10	None ³	None
Maximum Building Site Coverage	50%	50% ⁵	None ²

Source: Zoning Ordinance (City of Laguna Woods 2020).

¹ The minimum per dwelling unit is based on the net land area.

² There shall be no minimum lot size. The total number of residential units permitted within the planning unit shall not be exceeded, as was shown on the statistical analysis for the original planned community, as amended. The dwelling densities as categorized in the City's General Plan as low-density, medium-density, and high-density shall not be exceeded. The limitations contained within the General Plan shall take precedence over any discrepancies that may exist as compared to the statistical analysis for the planning units.

³ Required yards and distances between building structures are waived.

⁴ In computing the depth of a rear setback from any building where such setback opens on an alley, private street, or public park, one-half of the width of such alley, street, or park may be deemed to be a portion of the rear setback, except that under this provision, no rear setback shall be less than 15 ft.

⁵ The building site coverage shall not exceed 50 percent of the land area contained within each recorded tract, exclusive of dedicated ROW. Swimming pool coverage shall not be considered as building site coverage.

City = City of Laguna Woods

ft = foot/ feet

ROW = right-of-way

sf = square foot/feet

The cumulative effect of the City's residential development standards does not constrain the expansion of housing opportunities. Density standards are consistent with the densities established for General Plan land use categories. The setback requirements provide minimal light and air for development, are typical in the region, and do not unreasonably constrain housing opportunities.

All residential uses are currently required to provide the number of parking spaces as outlined in Table C. Developers of affordable and senior housing who are eligible for a density bonus pursuant to Government Code Sections 65919 through 65918 are eligible to use parking standards established by State law. Density bonus provisions are discussed in more detail later in this section.

Table C: Residential Parking Requirements

Use	Parking Requirement
Attached or detached single-family dwellings	<ul style="list-style-type: none"> 2 covered parking spaces for each dwelling unit.
Two or more dwelling units on one building site.	<ul style="list-style-type: none"> Studio to 1-bedroom: 1.5 parking spaces for each dwelling unit 2-bedroom: 2 parking spaces for each dwelling unit 3-bedroom and up: 2.5 parking spaces for each dwelling unit plus 0.5 parking space for each bedroom in excess.
Multifamily dwelling units (five or more dwelling units)	<ul style="list-style-type: none"> Each dwelling unit shall be assigned at least one standard-size parking space. Additional unassigned parking spaces shall be provided using the following formula, which is based on the size of each unit: <ul style="list-style-type: none"> <700 sf: 0 701–800 sf: +0.17 801–900 sf: +0.34 901–1,000 sf: +0.50 1,001–1,100 sf: +0.67 1,101–1,200 sf: +0.84 1,201–1,300 sf: +1.0 1,301–1,400 sf: +1.18 1,401–1,500 sf: +1.34 >1,500 sf: +1.5 1 guest parking space per every 4 dwelling units, rounded up to the next nearest whole number, shall be provided.

Source: Zoning Code (City of Laguna Woods 2020).
sf = square foot/feet

The City monitors its development standards and their impact on development. Periodically, the City will amend the Zoning Code to ensure that development standards respond to market trends. The City has adopted other provisions in the Zoning Code that facilitate a range of residential development types and encourage affordable housing, as discussed below.

2.2.1 Affordable Housing Density Bonus

Section 13.26.040 of the City's Zoning Code provides the details of the residential density bonus provision, which is intended to provide incentives for the production of housing for very low-income, lower-income, or senior households in accordance with California Government Code Sections 65915 and 65917. On September 16, 2020, the City amended its Density Bonus Ordinance to ensure compliance with the current State law in effect at that time. Assembly Bill (AB) 1763 made a number of changes to density bonus requirements for affordable projects. The bill requires a density bonus to be granted for projects that include 100 percent lower-income units, but allows up to 20 percent of total units in a project that qualifies for a density bonus to be for moderate-income households. Under the revised law, density bonus projects must be allowed four incentives or concessions, and for developments within 0.5 mile of a major transit stop, a height increase of up to three additional stories or 33 feet (ft). A density bonus of 80 percent is required for most projects, with no limitations on density placed on projects within 0.5 mile of a major transit stop. The bill also allows developers to request the elimination of minimum parking requirements for rental units affordable to lower-income families that are either supportive housing or special-needs housing, as defined. AB 2345, which was signed in September 2020, further incentivizes the production of

affordable housing. The City Council adopted updated residential density bonus standards regulations in December 2021.

In 2008, the San Sebastian senior apartments were completed with 17 units affordable to low-income residents. The development utilized a density bonus, and, as a result, the affordable units are subject to deed restrictions, which will ensure continued affordability through October 16, 2054.

2.2.2 Small-Lot Development

The City has not established any zoning districts that are intended to specifically facilitate small-lot residential development; however, the City's Zoning Code does not require minimum lot sizes in the Residential Community (RC) and Residential Tower (RT) zoning districts.

2.2.3 Special-Purpose Zoning Districts

Special-purpose zoning districts permit design and development standards to be established that are tailor-made for planned project areas with unique attributes. The City's Zoning Code includes the RC zoning district, which provides for the development and preservation of planned unit developments with a mixture of single-family attached and detached homes and multifamily homes. Neighborhoods in the RC district are characterized by controlled physical access and specialized recreation facilities. Setbacks and other development standards are to be tailored specifically to each project by means of a precise development plan that is approved with the project.

2.3 PROVISION FOR A VARIETY OF HOUSING TYPES

State Housing Element law specifies that local governments must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of various types of housing for all economic segments of the population, including multifamily residential housing, factory-built housing, emergency shelters, transitional housing, and supportive housing. Table D summarizes the housing types permitted in each of the City's zoning districts.

2.3.1 Single-Family Housing

Single-family housing is permitted by right in the Residential Multifamily (RMF) and RC districts. As outlined in the City's Zoning Code, standard development in the RC district shall be predominantly of multiunit, multistoried structures and single-family, one-story structures in an arrangement of attached or detached dwellings and their accessory structures.

2.3.2 Multifamily Housing

Multifamily housing is permitted by right in the RMF, RC, and RT districts. The RMF zoning district is intended to provide for the development and preservation of high-density multifamily residential neighborhoods with a moderate amount of open space. Care is taken to ensure that uses approved in the RMF zoning district are compatible with surrounding residential neighborhoods. RMF-zoned properties are located in three areas of Laguna Woods off major roadways. The RC district was created to provide for the development and preservation of planned unit developments with a mixture of single-family attached and detached homes, as well as multifamily homes.

Table D: Housing Types Per Zoning Code

Land Use Types	Zoning District		
	Residential Multifamily (RMF)	Residential Community (RC)	Residential Towers (RT)
Accessory Building/Use	A	A	A
Accessory Dwelling Unit	P	P	P
Condominiums/Stock Cooperatives	U	U	U
Community Apartment Projects	U	U	U
Community Care Facilities (<6 persons)	P	P	P
Congregate Care Facility	U	U	U
Duplex	P	U	X
Dwelling, Multiple-Family	P	P	P
Dwelling, Single-Family	P	P	X
Emergency and Transitional Housing Shelters	X	X	X
Guesthouse	X	A	X
Junior Accessory Dwelling Unit	P	P	P
Mobile Home	P	P	X
Mobile Home Development	U	U	X
Planned Unit Development	U	U	U
Residential Tract Sales & Rentals	T/SE	T/SE	T/SE
Supportive Housing	P	P	P
Transitional Housing	P	P	P

Source: Zoning Code (City of Laguna Woods 2020).

A = Permitted only as an accessory to a Principal Use

P = Permitted as a Principal Use

T/SE = Permitted with an approved Temporary Use/Special Event permit

U = Permitted with an approved use permit

X = Prohibited

RC-zoned properties encompass most of the land within Laguna Woods, reflecting its planned community heritage. The RT district was established to provide for the development and preservation of high-rise multifamily structures. RT-zoned properties exist in one small area in the western portion of Laguna Woods. Additional development standards are applicable to multifamily housing with more than five dwelling units on site, including standards related to circulation, lighting, waste disposal, and infrastructure.

2.3.3 Live/Work Units

The City's Zoning Code does not currently include any zoning districts that allow for live/work units.

2.3.4 Senior Housing

Section 13.06.010 of the City's Zoning Code defines senior citizen housing as "a residential development consisting of at least 35 dwelling units which is developed for, or substantially rehabilitated or renovated for, senior citizens." Additionally, California Civil Code Section 51.3 defines "senior citizen" as a person 62 years of age or older, or 55 years of age or older, in a senior citizen housing development, and "senior citizen development" as a residential development developed, substantially rehabilitated, or substantially renovated for senior citizens that has at least 35 dwelling units.

Section 13.26.030 of the City's Zoning Code, which provides details about housing incentive use permits for affordable or senior citizen housing, states that in any zoning district that permits residential uses, a housing incentive use permit application to permit more dwelling units than allowed by zoning, and/or establish special site development standards, may be approved for the purposes of facilitating affordable and/or senior citizen housing developments.

2.3.5 Manufactured Housing and Mobile Homes

Manufactured housing and mobile homes offer an affordable housing option for many low- and moderate-income households. Manufactured housing is permitted by right in all zoning districts that permit single-family dwelling units, as required by State law. Mobile homes are permitted in the RMF and RC districts, and mobile home parks are permitted in those same zoning districts with an approved use permit. Mobile home developments are subject to additional development standards not related to the use; instead, the standards relate to landscape screening and design. According to California Department of Finance estimates, there were no mobile homes in Laguna Woods as of January 2020.²

According to the National Manufactured Home Construction and Safety Act of 1974, a manufactured home built and certified after June 15, 1976 and constructed on a permanent foundation may be located in any residential zoning district where a conventional single-family detached dwelling is permitted subject to the same restrictions on density and to the same property development regulations. Manufactured homes are currently allowed in all residential zoning districts, subject to foundational regulations found in Government Code Section 65852.3. Manufactured housing is treated the same as single-family dwellings and is subject to the same property development standards and permitting process. The City's Zoning Code requires manufactured housing to be architecturally compatible (roofing overhangs, roofing materials, exterior siding, stucco, etc.) with single-family dwellings.

2.3.6 Accessory Dwelling Units

Per Government Code Section 65852.2, an "accessory dwelling unit" (ADU) is defined as "an attached or a detached residential dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence. It shall include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family or multifamily dwelling is or will be situated." ADUs may be an alternative source of affordable housing for lower-income households and seniors.

The City has updated its Zoning Code to permit ADUs by right if they are contained within the space of a proposed or existing single-family dwelling or accessory structure, or existing multifamily dwelling. This update to the City's Zoning Code was made to comply with State requirements, with Government Code Section 65852.2 used as a baseline for the amendments.

² California Department of Finance. 2020. E-5 Population and Housing Unit Estimates. Website: <https://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/> (accessed June 11, 2021).

Recent State legislation, including AB 68, AB 587, AB 881, and Senate Bill (SB) 13, addresses standards and regulations for ADUs. The bills modified the fees, application process, and development standards for ADUs, with the goal of lowering barriers to ADU development and increasing overall numbers of ADUs. Key provisions include the following:

- Prohibiting standards related to lot coverage standards, lot size, floor area ratio (FAR), or open space that have the effect of limiting ADU development
- Allowing ADUs within or attached to attached garages, storage areas, or accessory structures
- Removing requirements to replace parking when a garage or carport is demolished to develop an ADU
- Prohibiting maximum sizes for ADUs that are less than 850 square feet (sf) (1,000 sf for units with two or more bedrooms)

The City last updated its Zoning Code with regard to ADUs in 2020 to address the requirements of AB 68, AB 587, AB 881, and SB 13.

2.3.7 Residential Care Facilities

The Lanterman Developmental Disabilities Services Act (Lanterman Act) is a State law that sets out the rights of persons with developmental disabilities. The Lanterman Act impacts local zoning ordinances by requiring the use of property for the care of six or fewer disabled persons to be classified as a residential use, permitted by right, under zoning provisions. More specifically, a state-authorized, certified, or licensed family care home, foster home, or a group home serving six or fewer disabled persons or dependent and neglected children on a 24-hour-a-day basis is considered a residential use that is to be permitted in all residential zoning districts. No local government can impose stricter zoning or building and safety standards on these homes. Due to the unique characteristics of larger (more than six persons) residential care facilities, most local governments require a discretionary use permit to ensure neighborhood compatibility in the siting of these facilities.

The City's Zoning Code accommodates both large and small residential care facilities. The City facilitates and encourages the development of residential care facilities by treating licensed facilities that serve six or fewer persons as standard residential uses, consistent with State law. As such, community care facilities are permitted by right in all residential zoning districts. Additionally, community care facilities serving seven to 12 persons, except for large family day care homes, are permitted in any district, planned community, or specific plan area zoned for residential use, subject to the issuance of a use permit. The use permit is intended to ensure that the development is consistent with applicable zoning. In a supportive housing development, housing can be coupled with social services such as job training, alcohol and drug abuse programs, and case management for populations in need of assistance, such as the homeless, those suffering from mental illness or substance abuse problems, and the elderly or medically frail. Because supportive housing is a residential use, it would be treated as such in the development process whether the supportive housing development consisted of single-family detached units or apartment buildings. Similar to

other multifamily developments, the required use permit process is intended to establish appropriate and unique development standards for residential development in the RC and RT zoning districts, as the zoning regulations contain few standards. This allows for greater specificity in development standards.

Review of the California State Community Care Licensing Division inventory of community care facilities identifies two residential care facilities in Laguna Woods. These facilities are for individuals who require 24-hour supervision but who do not generally need medical care beyond routine health checks and medication monitoring. Las Palmas is a licensed residential care community with 184 rental units, and the Regency is a licensed residential care community that consists of 192 rental units and offers both independent and assisted living on a month-to-month basis. The Regency is the only residential community that, under unique circumstances, will accommodate individuals younger than 55 within its assisted living facility.

2.3.8 Single Room Occupancy

Single Room Occupancy (SRO) facilities are small, one-room units occupied by a single individual and may either have shared or private kitchen and bathroom facilities. SROs are rented on a monthly basis typically without rental deposit and can provide an entry point into the housing market for extremely low-income individuals, formerly homeless persons, and disabled persons.

The City has adopted provisions in its Zoning Code (Section 13.26.170) to accommodate and regulate the establishment of SRO uses. These provisions include the following requirements:

- In the absence of findings as set forth in alternatives to off-street parking requirements, provision of one-half parking space for each guest unit, plus one space for each employee
- Submittal of a management plan outlining management policies, operations, emergency procedures, a security program, rental procedures, maintenance plans, and staffing as part of the use permit application
- Provision of an on-site manager on a 24-hour basis
- Provision of a single manager's unit, which shall be designed as a complete residential unit and be a minimum of 225 sf in size.

SRO uses are permitted in any zoning district or specific plan area zoned for hotels, subject to the approval of a use permit. Furthermore, the City's Zoning Code states that SROs will be treated as nonresidential uses.

2.3.9 Emergency Shelters and Low Barrier Navigation Centers

An emergency shelter is a facility that provides shelter to homeless families and/or homeless individuals on a limited short-term basis. According to the 2019 Point-in-Time Count for Orange

County,³ there were five unsheltered people living in homelessness in Laguna Woods. State law requires emergency shelters to be permitted by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. The City's Zoning Code was amended in 2011 to include regulations pursuant to State law for emergency and transitional housing.

The City's Zoning Code Section 13.23.010 was also amended in 2018 to permit emergency shelters in the Community Facilities – Public/Institutional (CF-P/I) and Community Facilities – Private (CF-P) zoning districts as a by-right use.

Table E provides the development standards that apply to the CF-P and CF-P/I zoning districts.

**Table E: Development Standards for the Community Facilities
Zoning Districts**

Development Standard	CF-P	CF-P/I
Maximum Building Height (ft)	40	40
Minimum Building Site Area (sq ft)	—	—
Minimum Building Site Width (ft)	—	—
Minimum Perimeter Setback (ft)		
From Street ROW	20	20
From Alley	10	0
From Residential Districts	10	10
From Nonresidential Districts	0	0
Maximum FAR	0.3	0.3
Maximum Building Site Coverage	None	None
Parking	See Code Section 13.16.300-400	
Landscaping	See Code Section 13.16.250	
Screening	See Code Section 13.16.240	
Signs	See Code Section 13.16.410-530	
Waste Management/Hazardous Materials	See Code Section 13.20.200	

Source: Laguna Woods Municipal Code Section 13.13.030.

FAR = floor area ratio

ft = foot/feet

ROW = right-of-way

sq ft = square foot/feet

In addition to application of the CF-P/I and CF-P district development standards, pursuant to Government Code Section 65583, the City can also specify written, objective standards to regulate the following aspects of emergency shelters to enhance compatibility:

³ United to End Homelessness. Point-In Time Count. 2019. Website: <https://www.unitedtoendhomelessness.org/2019-point-in-time-count> (accessed April 29, 2021).

- 1. Location and Separation:** Emergency shelters shall be situated more than 300 ft from another emergency shelter.
- 2. Physical Characteristics:**
 - a. The maximum number of beds for emergency shelters shall be 20 unless a larger number is approved through a conditional use permit.
 - b. The maximum number of beds does not apply in situations of citywide or statewide designated disasters or catastrophic conditions as determined by the City Council or City Manager.
 - c. Emergency shelters shall have adequate private living space, shower and toilet facilities, and secure storage areas for its intended clients.
 - d. All on-site waiting and client intake areas shall be located in the interior of the emergency shelter and shall be of sufficient size to prevent any such activities from occurring in the exterior of the emergency shelter.

The CF-P/I and CF-P zoning districts have high access to public transit services. The Orange County Transportation Authority has two local routes, Routes 90 and 89, which provide regional access along the public streets located immediately adjacent to the CF-P/I and CF-P zoning districts.

The City provides adequate and accessible sidewalks, vehicular access, and bicycle access to the CF-P/I and CF-P zoning districts.

The CF-P/I and CF-P zoning districts are surrounded by residential, open space, and/or community commercial land uses, and are therefore not located in close proximity to any uses that would create hazardous conditions or conditions inappropriate for human habitability.

The City's Zoning Code requires the following conditions to be met for emergency shelters in order to ensure "adequate" private living space requirements.

1. Operational Standards.

- (1) If an emergency shelter includes a drug or alcohol abuse counseling component, appropriate state and/or federal licensing shall be required.
- (2) Emergency shelters shall limit occupancy by each client to no more than 180 days in a 365-day period.
- (3) Emergency shelters shall conduct all on-site waiting and client intake activities in the interior of the emergency shelter and prevent any such activities from occurring in the exterior of the emergency shelter.
- (4) Emergency shelters shall provide on-site security during all hours of operation, including a minimum of one security guard licensed by the State of California for

each 20 clients, unless alternate security arrangements are approved through a conditional use permit.

(5) Emergency shelters shall provide on-site management during all hours of operation, including a minimum of one supervisor per emergency shelter and a minimum of one additional attendant for each 20 clients, unless alternate on-site management arrangements are approved through a conditional use permit.

AB 139 requires that emergency shelters provide parking to accommodate all staff, “provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.” The City’s Zoning Code does not contain unique parking standards for emergency shelters.

AB 101 requires cities to allow a Low Barrier Navigation Center development by right in areas zoned for mixed uses and nonresidential zoning districts permitting multifamily uses if it meets specified requirements. A “Low Barrier Navigation Center” is defined as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” Low Barrier Navigation Centers may include options such as allowing pets, permitting partners to share living space, and providing storage for residents’ possessions. AB 101 also sets a timeline for jurisdictions to act on applications for Low Barrier Navigation Center developments. The requirements of this bill are effective through the end of 2026, at which point they are repealed.

2.3.10 Transitional Housing and Supportive Housing

Health and Safety Code Section 50675.2 defines “transitional housing” and “transitional housing development” as buildings configured as rental housing developments but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Residents of transitional housing are usually connected to supportive services designed to assist the homeless in achieving greater economic independence and a permanent, stable living situation. Transitional housing can take several forms, including group quarters with beds, single-family homes, and multifamily apartments, and typically offers case management and support services to help return people to independent living (often in six months to two years).

Government Code Section 65582 defines supportive housing as housing with no limits on the length of stay that is occupied by a “target population” and links this population with the provision of housing and social services. “Target population” means persons with low incomes who have one or more disabilities, including mental illness, HIV/AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Act (Division 4.5 [commencing with Section 4500] of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (Government Code Sections 65582(f) and (g)).

State law requires transitional and supportive housing to be defined as a residential use and subject only to the same regulations as comparable residential uses. The City currently permits emergency shelters by right in the Community Facilities - Public/Institutional (CF-P/I) and Community Facilities - Private (CF-P) zoning districts with the intent to provide adequate development and operational standards for such uses to ensure that the appropriate housing and services for special needs populations are met.

AB 2162 requires supportive housing projects of 50 units or fewer to be permitted by right in zoning districts where multifamily and mixed-use developments are permitted, when the development meets certain conditions. The City may choose to allow larger supportive housing projects by right in those zoning districts. The bill also prohibits minimum parking requirements for supportive housing within 0.5 mile of a public transit stop.

2.3.11 Employee Housing

The City has no land zoned for agriculture and does not contain any agricultural land uses. Further, the 2015–2019 American Community Survey estimates there are no residents who hold farming, fishing, or forestry occupations. Therefore, there is no need for farmworker housing.

Further, because the City has not adopted any ordinances relating to employee housing, it does not anticipate that any other facilities or employers would provide housing for their employees.

2.4 HOUSING FOR PERSONS WITH DISABILITIES

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling.

The City has conducted a review of zoning and building code requirements and permitting procedures to identify potential constraints for housing for persons with disabilities. The City's policies and regulations regarding housing for persons with disabilities are described below.

2.4.1 Zoning and Land Use

Restrictive land use policies and zoning provisions can constrain the development of housing for persons with disabilities.

2.4.1.1 Definition of Family

Local governments may restrict access to housing for households failing to qualify as a “family” by the definition specified in the Zoning Code. Specifically, a restrictive definition of “family” that limits the number of and differentiates between related and unrelated individuals living together may

illegally limit the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated.⁴

Section 13.06.010(d)(395) of the Zoning Code defines “family” as “One or more persons occupying one dwelling unit. The term “family” includes the occupants of community care facilities serving six or fewer persons that are permitted or licensed by the State. The term “family” does not include occupants of a fraternity, sorority, boardinghouse, lodginghouse, club, or motel.” To accommodate disabled persons in public facilities, the City defers to the California Access Compliance Reference Manual from the Department of General Services, Division of the State Architect.

The Housing Element includes a program to amend the Zoning Code’s definition of “family” to resolve inconsistencies between the current definition and applicable state law.

2.4.1.2 Residential Care Facilities

Under the Lanterman Act, small licensed residential care facilities for six or fewer persons must be treated as regular residential uses and permitted by right in all residential zoning districts. The City permits small licensed residential care facilities in all residential zoning districts and does not have additional development standards for these facilities and is, therefore, in compliance with the Lanterman Act.

The Housing Element includes a program to amend the Zoning Code to remove the requirement for residential care facilities for seven to 12 persons to obtain a conditional use permit.

2.4.1.3 Parking Standards

Development in the City is required to meet parking standards for people with disabilities, as required by State law, including requirements for the number and design of disabled parking spaces.

2.4.1.4 Reasonable Accommodation

The Fair Housing Act requires that local governments provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal opportunity to housing. To create a process for making requests for reasonable accommodation to land use and zoning decisions and procedures regulating the siting, funding, development and use of housing for people with disabilities, the City has adopted a Reasonable Accommodations Ordinance in accordance with State law (Section 13.15.010 of the

⁴ California court cases (City of Santa Barbara v. Adamson, 1980 and City of Chula Vista v. Pagard, 1981, etc.) have ruled an ordinance as invalid if it defines a “family” as: (a) an individual; (b) two or more persons related by blood, marriage, or adoption; or (c) a group of not more than a specific number of unrelated persons as a single housekeeping unit. These cases have explained that defining a family in a manner that distinguishes between blood-related and non-blood related individuals does not serve any legitimate or useful objective or purpose recognized under the zoning and land use planning powers of a municipality, and therefore violates rights of privacy under the California Constitution.

City's Zoning Code). The Reasonable Accommodations Ordinance provides for flexibility in the City's development standards to accommodate persons with disabilities.

The following findings are required to approve reasonable accommodation requests:

1. The requested accommodation is requested by or on the behalf of one or more individuals with a disability protected under the fair housing laws;
2. The requested accommodation is necessary to provide one or more individuals with a disability an equal opportunity to use and enjoy a dwelling;
3. The requested accommodation will not impose an undue financial or administrative burden on the city;
4. The requested accommodation will not result in a fundamental alteration in the nature of a city program or law, including but not limited to land use or zoning; and
5. The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health and safety of other individuals or substantial physical damage to the property of others.

2.4.2 Building Codes

The City enforces the California Building Code (CBC), including Chapters 11A (Housing Accessibility) and 11B (Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and Publicly Funded Housing), which regulate the access and adaptability of buildings to accommodate persons with disabilities. Furthermore, Government Code Section 12955.1 requires that 10 percent of the total dwelling units in multi-family buildings without elevators consisting of three or more rental units or four or more condominium units are subject to the following building standards for persons with disabilities:

- The primary entry to the dwelling unit shall be on an accessible route unless exempted by site impracticality tests.
- The public and common areas shall be readily accessible to and usable by persons with disabilities.
- All the doors designed to allow passage into and within all premises shall be sufficiently wide to allow passage by persons in wheelchairs.
- All premises within covered multifamily dwelling units shall contain the following features of adaptable design:
 - An accessible route into and through the covered dwelling unit.
 - Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations.

- Reinforcements in bathroom walls to allow later installation of grab bars around the toilet, tub, shower stall, and shower seat, where those facilities are provided.
- Useable kitchens and bathrooms so that an individual in a wheelchair can maneuver about the space.

Compliance with the CBC, Government Code, and federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building Division as a part of the building permit process. The City has not adopted any amendments to the CBC that diminish the ability to accommodate persons with disabilities.

2.4.3 Conclusion

The City has not adopted unique restrictions that constrain the development of housing for persons with disabilities nor has it adopted regulations inconsistent with applicable federal or State law. There are no City-initiated constraints on housing for persons with disabilities caused or controlled by the City. In addition, the City has adopted formalized criteria and processing procedures for reasonable accommodation applications within its Zoning Code.

2.5 SITE IMPROVEMENTS

Developers of single-family residential tracts in the City are required to install arterial and local streets; sewer and water lines; storm drainage; curbs, gutters, and sidewalks; street lighting; underground utilities; and landscaping in the public right-of-way within and adjacent to a tract, if such facilities do not already exist. In most cases, these facilities are dedicated to the City or other agencies that are responsible for ongoing maintenance. Requirements for site improvements are at a level necessary to meet the City's costs and are necessary to protect health, safety, and welfare.

The cost of required off-site improvements vary with the sales price of each dwelling unit depending on the nature of development (i.e., level of improvements required). The City may also impose development impact fees on future housing developments in order to recover costs of installing off-site improvements including upgrading the circulation system and other urban service systems to serve increased density. The developed portions of Laguna Woods have the majority of necessary infrastructure, such as streets, electrical and water facilities, already in place. However, due to the age of the existing infrastructure, many areas where infill housing development is expected to occur may require infrastructure improvements to ensure sufficient capacity at build-out.

The City's Zoning Code includes minimum street width standards. Private streets serving four or less parcels as access to a public street are required to provide for a minimum pavement width of 16 feet within a minimum 20 ft wide right-of-way. Private streets serving five parcels or more as access to a public street are required to provide for a minimum pavement width of 28 ft within a minimum 40 ft wide right-of-way. Sidewalks are required to not be less than 6 ft in width. Streets in residential districts requiring a building site area of 15,000 sf or more and where no sidewalks are to be installed, are required to have a right-of-way that will provide a parkway width of at least 4 ft.

2.6 DEVELOPMENT FEES

The City collects various fees from developers to cover the costs of processing permits, including fees for planning approvals, subdivision map act approvals, environmental review, public works and plan check services, and building permits, among others. In addition to these service fees associated with development processing, the City also charges several impact fees to offset the future impact of development on parks and traffic circulation.

Table F lists residential development processing fees, based off the fee schedule that is effective July 19, 2021. Prior to this update, the City's fees were last updated in 2020. There were no significant increases to planning/development and building fees.

Table F: Current Residential Development Processing Fees

Development Fees	Initial Deposit
Conditional Use Permit	\$4,000
Development Agreement	\$10,000
Environmental Impact Report	\$10,000
General Plan Amendment	\$10,000
Zoning Code Amendment	\$10,000
Initial Study/Negative Declaration/Mitigated Negative Declaration	\$5,000
Sign Program	\$2,500
Site Development Permit	\$4,000
Specific Plan	\$10,000
Variance	\$3,500
Zone Change	\$10,000

Sources: City of Laguna Woods (2021).

Note: Unless otherwise noted, all fees are the minimum fee for the service. The final fee is based on actual costs, which may exceed the minimum fee.

Table G provides a comparison of the City's fees with other cities in the region. As shown, the City's fees are generally comparable to other cities.

Table G: Comparison of Processing Fees

Fee Type	Laguna Woods	Laguna Niguel	Laguna Hills	Lake Forest
Conditional Use Permit	\$4,000	\$3,800	\$8,148.07	\$2,400-5,000
Variance	\$3,500	\$3,800	\$6,293.38	\$5,000
Zone Change	\$10,000	\$5,000	\$10,522.43	\$10,000
General Plan Amendment	\$10,000	\$5,000	\$7,547.86	\$10,000
Tentative Tract Map	Varies	<ul style="list-style-type: none"> Preliminary Screencheck: \$1,425 (Flat) Filing: \$2,925 + \$25/each lot (Deposit) Added Lots to Filed Map: \$36/each lot (Flat) Changed Map: \$370 (Flat) Appeal to City Council: \$585 (Flat) Amendment to Conditions: \$155 (Flat) Amend Approved Map: \$1,000 + \$36/each numbered lot (Deposit) 	\$9,182.99	\$10,000
Tentative Parcel Map	Varies	<ul style="list-style-type: none"> Preliminary Screencheck: \$980 (Flat) Filing: \$2,080 (Deposit) Appeal to City Council: \$235 (Flat) 	\$9,182.99	\$7,500

Table G: Comparison of Processing Fees

Fee Type	Laguna Woods	Laguna Niguel	Laguna Hills	Lake Forest
		<ul style="list-style-type: none"> Amendment to Conditions: \$155 (Flat) Amend Approved Map: \$1,000 + \$36/each numbered lot (Deposit) 		

Sources: City of Laguna Woods (2020); City of Laguna Niguel (2020); City of Laguna Hills (2020); City of Lake Forest (2020).

Note: The fees listed above are generally approximated base fees or deposits; if the cost of providing the service exceeds the base fee or deposit, the balance is collected from the applicant.

In general, fees can be a constraint on housing development and compromise affordability because the additional cost borne by developers contributes to overall increased housing unit cost. However, the City's fees are necessary to maintain adequate planning services and other public services and facilities.

As noted elsewhere in this Constraints Analysis, the City has not processed a residential development application since the San Sebastian Apartments in the mid-2000s. Since that date, the City has evaluated the adequacy and rationality of its fees, and made changes to recover its reasonable costs of providing services, as allowed by state law. While some building fees have increased as a result of this evaluation, others have been eliminated. For example, the City no longer collects parkland dedication (Quimby Act) fees nor library development fees on behalf of the Orange County Library District. In addition, the County of Orange intends to end the Moulton Parkway-Laguna Niguel Road Fee Program as early as June 30, 2022, thereby eliminating those fees. Therefore, there is a strong likelihood that current development fees for a similar residential project would actually be the same or lower than what was assessed for the San Sebastian Apartments project. Due to the City's current fee structure, this would particularly be true if several of the requisite building inspections were consolidated.

The City's development fees do not appear to represent a constraint on housing development.

2.7 LOCAL PROCESSING AND PERMIT PROCEDURES

Development review and permit processing procedures are necessary steps to ensure that residential construction proceeds in an orderly manner.

Table H outlines the development review processing times and approval procedures for residential developments. Depending on the type of discretionary approval that is required, a one or two-level decision-making process may be required. The City's process is somewhat more streamlined than many other cities in that the City Council also serves as the Planning Commission.

Table H: Typical Permit Processing Timelines

Action/Request	Processing Time	Comments
Environmental Impact Report	9-12 months	Processing and review time limits controlled through CEQA. Adopted by the City Council.
Initial Study/Mitigated Negative Declaration	6-9 months	Processing time can be extended if the project has a longer review and approval period. Adopted by the City Council.

Table H: Typical Permit Processing Timelines

Action/Request	Processing Time	Comments
General Plan Amendment	10–12 months	Government Code Section 65358 limits the number of times any element of the General Plan can be amended each calendar year. Requires a public hearing for the City Council.
Zone Change	8–12 months	Certain procedures and time limits established by Gov. Code Sections 65854-65857. Approved by the City Council.
Tentative Parcel Map	45–60 days	Approved by the City Council.
Tentative Tract Map	6–8 months	Approved by the City Council.
Variance	3–4 months	Approved by the City Council.
Conditional Use Permits	3–4 months	Approved by the City Council.

CEQA = California Environmental Quality Act

2.7.1 Conditional Use Permit

Conditional Use Permits (CUPs) are required for some multi-family development, senior housing projects, and large residential care facilities, dependent upon the underlying zoning district. As shown in Table H, the processing time for a CUP is typically 90 to 120 days.

The City's Zoning Code establishes the same required findings for the approval of all CUP applications, regardless of proposed use:

1. The proposed location of the conditional use is consistent with the requirements of the general plan and the zoning district in which the site is located;
2. The proposed location of the conditional use and the conditions under which it would be operated or maintained would not be detrimental to the public health, safety, or general welfare, nor would be materially injurious to properties or improvements in the vicinity; and
3. The proposed conditional use would comply with all applicable provisions of this zoning ordinance.

It should be noted that the City's CUP requirement only applies to condominiums and apartments in existing residential zones and would not apply to the "by-right" overlay zoning districts to be created through the Housing Element's rezoning program. Although the CUP requirement does not affect the City's housing supply, it could affect affordability but, again, not within the "by right" overlay zoning districts to be created through the Housing Element's rezoning program.

2.7.2 Conclusion

Although the City has not processed an application for a residential development project since the San Sebastian Apartments in the mid-2000s, it is committed to working closely with developers to approve residential projects in a timely manner and minimize any potential time constraints on development. For a typical project, the developer would meet with Planning Division staff to discuss the project and then would submit plans for a preliminary review. Plans would then be submitted to the Building Division for plan check and building permit issuance. Projects requiring a CUP would be

evaluated based on the criteria listed above and reviewed by the City Council prior to plans being submitted for plan check. The City does offer concurrent processing of planning and building plans if so desired by the applicant. Throughout construction, the Building Division would perform inspections to monitor the progress of the project. This process is comparable to that of many cities in the region; therefore, processing times would be typical for the region.

2.8 BUILDING CODES

As required of all local governments in California, the City enforces the CBC. The CBC establishes construction standards necessary to protect public health, safety, and welfare and all new constructions and renovations must conform to the standards of the CBC.

Based on recommendations from the Orange County Fire Authority (OCFA), the City has adopted several amendments to the CBC, which revised the following chapters:

- Scope and administration;
- Definitions;
- General requirements;
- Emergency planning and preparedness;
- Fire service features;
- Fire protection and life safety systems;
- Construction requirements for existing buildings;
- Energy systems;
- Fruit and crop ripening;
- Fumigation and insecticidal fogging;
- Lumber yards and agro-industrial, solid biomass and woodworking facilities;
- Requirements for wildland-urban interface fire areas;
- Hazardous materials;
- Explosives and fireworks;
- Flammable and combustible liquids;
- Flammable gases and flammable cryogenic fluids;
- Referenced standards; and
- The various appendices.

More information on these changes can be found in the City's Municipal Code. Compliance with the CBC, and the City's locally adopted amendments to the CBC, should not significantly add to the cost of construction since the CBC is mandated to be enforced statewide and costs should be relatively uniform statewide. In addition, because the OCFA serves as a regional fire protection agency, the County of Orange and 22 other member cities have adopted substantially similar amendments, which means that the cost of complying with the City's amendments to the CBC is substantially similar to most of the other cities in Orange County. Costs associated with the CBC and any locally adopted amendments are necessary to protect the health safety and welfare of the citizens. Compliance ensures that all new or renovated buildings are structurally sound, have proper exiting, and are equipped with necessary fire protection features. In addition, the CBC mandates energy efficiency as well as provisions for access for persons with disabilities.

2.9 FEDERAL AND STATE REGULATIONS

Federal and State requirements may act as a barrier to the development or rehabilitation of housing, and affordable housing in particular. These include State prevailing wage requirements and environmental review requirements.

2.9.1 State Prevailing Wage Requirements

Labor Code Section 1720, which applies prevailing wage rates to public works of over \$1,000, defines public works to mean construction, alteration, installation, demolition, or repair work done under contract and paid for in whole or in part out of public funds. For example, public transfer of an asset for less than fair market value, such as a land write-down, would be construed to be paid for in part out of public funds and trigger prevailing wage requirements.

While the cost differential in prevailing and standard wages varies based on the skill level of the occupation, prevailing wages tend to add to the overall cost of development. In the case of affordable housing projects, prevailing wage requirements could effectively reduce the number of affordable units that can be achieved with public subsidies. However, State law does allow a number of exceptions for single-family homes and for projects intended to support affordable housing, such as the construction or expansion of emergency shelters or construction of some types of affordable housing units.

2.9.2 Environmental Protection

Federal and State regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, conditional use permits, etc.). Costs resulting from the environmental review process, such as costs related to the preparation of environmental analyses, increase the cost of housing and may be passed on to the consumer. Environmental review can also impact the processing time for project review due to mandated public review periods. However, the presence of these regulations helps preserve the environment and ensure environmental safety. Recent State laws have established exemptions from CEQA for infill and affordable housing projects. Due to the City's predominantly built-out nature, it is anticipated that the majority of proposed projects would be in-fill and likely exempt from environmental review as urban infill projects.

2.9.3 State Transparency Requirements

AB 1483 requires the City to provide on its website a current schedule of fees, exactions, and affordability requirements imposed by the City applicable to a proposed housing development project, all zoning ordinances and development standards, and annual fee reports or annual financial reports, as specified. AB 1483 also requires the City to provide on its website an archive of impact fee nexus studies, cost of service studies, or equivalent, as specified.

The information provided on the City's website complies with AB 1483.

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3.0 MARKET CONSTRAINTS

3.1 AVAILABILITY OF FINANCING

The availability of financing in a community depends on a number of factors, including the type of lending institutions active in the community, lending practices, rates and fees charged, laws and regulations governing financial institutions, and equal access to those institutions.

Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. A total of 1,112 households applied for mortgage loans for homes in the seven census tracts that include residential areas in Laguna Woods in 2019 (Table I). Overall, 62 percent of these applications were approved, 15 percent were denied, and 23 percent were either withdrawn or closed for incompleteness. Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. Of the 453 applications for conventional purchase loans, 70 percent were approved. The approval rate for government-backed loans was slightly higher at 72 percent, while the approval rate for refinance applications was 58 percent. Home improvement loan applications had the lowest approval rating, with 37 percent of applications being approved and 44 percent being denied.

Table I: Disposition of Home Purchase and Improvement Loan Applications (2019)

Loan Type	Total Applications	Approved	Denied	Other
Government-Backed Purchase	39	72%	8%	20%
Conventional Purchase	453	70%	10%	20%
Refinance	545	58%	16%	26%
Home Improvement	75	37%	44%	19%
Total	1,112	62%	15%	23%

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act Data Publication. (2019).

Note: "Other" includes files closed for incompleteness and applications withdrawn. Data covers the seven census tracts that include residential areas in Laguna Woods (Census Tracts 626.22, 626.25, 626.41, 626.46, 626.47, 626.48, and 626.49).

3.2 FORECLOSURES

Foreclosure occurs when households fall behind on one or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current. If payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess (take over) the home. When this happens, the homeowners must move out of the property. If the home is worth less than the total amount owed on the mortgage loan, a deficiency judgment could be pursued. If that happens, the homeowner would lose their home and also would owe the home lender an additional amount.

Between 2000 and 2005, with low interest rates, "creative" financing (e.g., zero down, interest only, adjustable loans), and predatory lending practices (e.g., aggressive marketing, hidden fees, negative

amortization), many households purchased homes that were beyond their financial means. Under the false assumptions that refinancing to lower interest rates would always be an option and home prices would continue to rise at double-digit rates, many households were unprepared for the hikes in interest rates, expiration of short-term fixed rates, and decline in sales prices that set off in 2006. Suddenly faced with significantly inflated mortgage payments, and “upside-down” mortgage loans (that are larger than the worth of the homes), many had to resort to foreclosing their homes.

However, since the Great Recession, foreclosure rates have come down significantly. As of June 2021, there was only one home in Laguna Woods in some stage of foreclosure. The foreclosure rate was less than 0.01 percent for Laguna Woods as well as for Orange County as a whole.⁵

3.3 DEVELOPMENT COSTS

3.3.1 Land Availability and Cost

The availability and price of land represents a significant market constraint to housing production throughout most of Southern California. This constraint is particularly acute in communities, such as Laguna Woods, where there is very little residentially designated vacant land. In June 2021, based on a survey of online real estate listings, there were no vacant properties listed for sale within Laguna Woods. Due to limited land availability, most new residential development in Laguna Woods will involve redeveloping properties with existing uses, which tends to add to the cost of land.

Density bonuses are available for projects that include affordable housing. Developers of affordable housing may also be granted regulatory concessions or development incentives. Density bonuses, together with the incentives and/or concessions, result in a lower average cost of land per dwelling unit thereby making the provision of affordable housing more feasible.

3.3.2 Cost of Construction

The cost of labor and building materials has a significant impact on the overall cost of new housing and can, therefore, be a constraint to affordable housing development. According to the National Association of Home Builders Construction Cost Survey, construction costs (including labor and materials) account for over 55 percent of the sales price of a new single family home. The Construction Cost Survey found that the average construction cost for a single family home in 2017 was \$237,760. It should be noted that the Construction Cost Survey is a national survey and may not be completely representative of Laguna Woods or Orange County; however, it does illustrate that construction costs comprise a significant proportion of the ultimate sales price of residential development. While significant, construction costs are consistent throughout the region and therefore would not specifically constrain housing development in Laguna Woods when compared to other cities in the region.

A reduction in amenities and the quality of building materials (above a minimum acceptability for health, safety, and adequate performance) can result in lower development costs. As part of the City’s density bonus and inclusionary housing programs, the City allows affordable units to be

⁵ Realtytrac.com (accessed June 2021).

smaller in size (maintaining the same number of bedrooms), and could also consider allowing less costly features and interior finishes, provided all project units were comparable in construction quality and exterior design.

Another factor related to construction costs is the number of units built at one time. As that number increases, overall costs generally decrease as builders are able to take advantage of the benefits of economies of scale.

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4.0 INFRASTRUCTURE CONSTRAINTS

The availability of public infrastructure and services for residential development is another potential constraint to the development of housing. The majority of Laguna Woods is highly urbanized and built-out with most of the necessary infrastructure, streets, electrical lines, and water distribution already in place. This section provides an overview of potential utility service constraints.

4.1 WATER

Laguna Woods is served by the El Toro Water District (ETWD), a public water service agency. Water provided in the El Toro Water District is nearly entirely dependent on imported water. Imported water is transported via a blend of water from the Colorado River and the Sacramento Bay Delta via the State Water Project. Both sources of import water are transported from hundreds of miles through a series of tunnels, aqueducts and pipelines to reach Orange County, and are distributed by the Metropolitan Water District (MWD) of Southern California, the region's wholesale water provider. ETWD purchases this imported water from the MWD through the Municipal Water District of Orange County. ETWD has taken a leading role in improving local water supply reliability for south Orange County. Together with the Santa Margarita Water District and the Moulton Niguel Water District, ETWD maintains and operates a large covered drinking water reservoir with a capacity of 275 million gallons. In the event of an emergency or unplanned interruption of water service, the reservoir could provide a 14-day supply of water to ETWD customers.

According to ETWD's Draft 2020 Urban Water Management Plan (UWMP), water use within its service area was 7,167 acre-feet of potable water and 1,270 acre-feet of recycled water for landscape irrigation in 2019. A stable trend is expected because ETWD's service area is predominantly built-out and the rate of population growth is small (about 0.23 percent per year). Water conservation efforts also kept per capita water use down. The total service demand was expected to increase to 8,737 acre-feet by 2025 and projected to increase to 9,156 acre-feet by 2045. According to the UWMP, ETWD's system is expected to have the ability to supply 9,156 acre-feet of water in 2045, meeting the projected demands. ETWD's demand projections consider such factors as current and future demographics, future water use efficiency measures, and long-term weather variability, and specifically take into account the additional housing units that each of the cities within its service area must plan for as part of the RHNA requirements. Therefore, adequate water supply is available to accommodate the RHNA during the Housing Element planning period.

SB 1087 requires that water providers develop written policies that grant priority to proposed development that includes housing affordable to lower-income households. The legislation also prohibits water providers from denying or conditioning the approval of development that includes housing affordable to lower income households, unless specific written findings are made. The City will provide a copy of the adopted Housing Element to ETWD after adoption and will continue to coordinate with ETWD to ensure priority service provision to affordable housing developments.

4.2 WASTEWATER

Wastewater in Laguna Woods is collected, treated, and disposed of by ETWD's Wastewater Treatment Plant (WTP), which has a maximum capacity of 6 million gallons per day. In addition,

ETWD operates a Water Recycling Plant (WRP), which allows it to reuse much of its wastewater effluent as recycled water by applying a tertiary treatment process. The WTP and WRP serve portions of the cities of Laguna Hills, Mission Viejo, Aliso Viejo, Lake Forest and all of Laguna Woods. ETWD has been able to meet its water demands from a combination of water resources and technology that optimally promote use of water conservation practices, water importation and recycled water treatment and delivery. In 2012, ETWD began a Recycled Water Expansion Project to increase the treatment and delivery of recycled water through a new tertiary treatment facility. The tertiary treatment plant is designed to produce as much as 3.7 million gallons of recycled water per day with a peak hour pumping capacity of over 5,000 gallons per minute. The WRP expansion was designed with the ability to expand capacity up to the expected maximum amount of raw wastewater entering the plant. Simultaneously, ETWD built a new recycled water distribution system that includes 140,000 ft of recycled water pipelines beneath the roadways in portions of Laguna Woods and the northwest portion of Laguna Hills. Therefore, there are no constraints on the availability of wastewater disposal or treatment.

SB 1087 mandates priority sewage collection and treatment service to housing developments providing units affordable to lower-income households. The City will provide a copy of the adopted Housing Element to ETWD after adoption. The City will continue to coordinate with ETWD to ensure priority service provision to affordable housing developments.

4.3 TRANSPORTATION INFRASTRUCTURE

In 1990, Orange County voters approved Measure M, the Revised Traffic Improvement and Growth Management Ordinance, which provides funding to Orange County for needed transportation improvements over a 20-year period through the imposition of a one-half cent retail transaction and use tax. In 2006, voters extended the tax through 2041 (Measure M2). Cities such as Laguna Woods can qualify for Measure M funds if they comply with the Countywide Growth Management Program component requirements and have an established policy framework for that program. As part of complying with the Countywide Growth Management Program component requirements, Laguna Woods implemented a development mitigation program that established a fee structure for requiring new development to pay its proportionate share funding of impacts to the regional roadway system.

In order to assist with the long-term development of funding for major capital improvement projects on public property, the City Council adopts a minimum 7-year Capital Improvement Program (CIP) on an annual basis. The CIP and the minimum 7-year period to which it applies is also a requirement for receiving funding from Measure M2.

In addition, the City is within the San Joaquin Hills Transportation Corridor (SJHTC) fee assessment area. The payment of development impact fees is required as a condition of approval of a final parcel or tract map or as a condition of issuing a building permit on any properties within the fee assessment area, as authorized by Government Code Section 66484.3. These development impact fees are collected for the purpose of repaying the indebtedness incurred to construct the San Joaquin Hills Transportation Corridor (State Route 73) that has already been built, as well as to pay the cost of future anticipated improvements and ongoing planning and environmental requirements.

Fees are collected on new residential dwellings and new non-residential square footage in areas identified as the area of benefit surrounding the corridor. While most of Laguna Woods is within Area of Benefit Zone A for the SJHTC, the northern portions of the City are within Area of Benefit Zone B. Table J provides a summary of the current (2021) development impact fees assessed within those areas. In 1997, the San Joaquin Hills Transportation Corridor Agency (SJHTCA) Board of Directors adopted a set rate of increase for the fees. Each July 1, rates for the SJHTCA increase by 2.667 percent.

**Table J: San Joaquin Hills Transportation Corridor
Development Impact Fees (2021)**

	Zone A	Zone B
Single Family Residential	\$5,893/unit	\$4,567/unit
Multi-Family Residential	\$3,432/unit	\$2,664/unit

Source: Transportation Corridor Agencies (2021).

Note: In 1997, the San Joaquin Hills Transportation Corridor Agency Board of Directors adopted a set rate of increase for the fees. Each July 1, rates increase by 2.667 percent.

While the traffic mitigation fees described above may present a constraint to housing development, they are necessary to facilitate the ongoing maintenance of transportation infrastructure.

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5.0 ENVIRONMENTAL CONSTRAINTS

A wide range of environmental factors may constrain the development of new housing. Areas of special environmental significance, potential safety hazards, and development constraints have influenced and will continue to influence land use policy. The City's Safety Element identifies areas subject to a number of environmental constraints, including flooding, seismic hazards, hazardous and toxic materials, and urban fires. The City's General Plan recognizes those hazards and identifies programs to minimize them.

5.1 FLOODING

The Federal Emergency Management Agency (FEMA) publishes maps that identify areas of the City subject to flooding in the event of a major storm. Those Flood Insurance Rate Maps (FIRMs) indicate areas that may be inundated in the event of a 100-year or a 500-year storm. In addition, the maps indicate the base flood elevations at selected intervals of the floodway. The flood map contained in the City's Safety Element indicates that very few areas are within 100-year flood event inundation areas. Areas are limited to the small reservoir southeast of the intersection of Moulton Parkway and Ridge Route Drive, the 9 Hole Par 3 Golf Course in Laguna Woods Village, and Aliso Creek in the southeastern portion of Laguna Woods. The projected 500-year flood would most significantly affect low-lying areas along Aliso Creek.

Additional flood hazards include the four reservoirs with a total maximum capacity of 10 million gallons of potable water distributed throughout Laguna Woods. Two of these reservoirs are located at a high point northwest of the intersection of El Toro Road and Moulton Parkway, and two are located in Laguna Woods Village (one at the south end of Calle Sonora Este and another on the west side of Bahia Blanca West). The dam/reservoir located southeast of the intersection of Moulton Parkway and Ridge Route Drive (Rossmoor #2) is located in a 100-year floodplain, but is not subject to State dam inundation mapping regulations. The Veeh Reservoir located nearby in the City of Laguna Hills is also within a 100-year floodplain. According to the City's Safety Element, failure of any of the previously mentioned ETWD infrastructure could cause localized flooding.

The Moulton Niguel Water District owns and operates a water tank in the City of Aliso Viejo just south of the intersection of El Toro Road and Aliso Creek Road. Failure of that water tank could cause flooding on El Toro Road and in the lower portions of Woods End Wilderness Preserve.

The failure of the bridge along Avenida Sevilla that crosses Aliso Creek could impede movement and cause localized flooding on property in Laguna Woods Village. Flood hazards in Laguna Woods pose a moderate risk. Areas designated for future residential development will be evaluated on an individual basis regarding their potential flood hazard.

5.2 SEISMIC AND GEOLOGIC HAZARDS

As stated in the City's Safety Element, the entirety of Laguna Woods—as well as all of Southern California—is located within a seismically active region that has been subject to major earthquakes in the past. There are no known faults in Laguna Woods. However, the Newport-Inglewood, Whittier-Elsinore, Glen Ivy Elsinore, and Temecula-Elsinore faults are located within close proximity

to Laguna Woods. The closest fault—Newport-Inglewood—traverses approximately 7-8 miles southwest of Laguna Woods. The San Andreas and San Jacinto faults are located much further away from Laguna Woods (the San Jacinto Fault crosses the region approximately 40 miles northeast of Laguna Woods and the San Andreas Fault is even farther away [approximately 50 miles northeast]). Although farther away, those faults have the potential to deliver larger magnitude earthquakes than the other five faults mentioned above. Other major faults may be buried under alluvium, or fault traces may have been obliterated due to natural weathering.

Liquefaction is another hazard associated with intense ground shaking, in which the soil can destabilize and if sufficient water is present in the soil, the soil and water can mix. The City's Safety Element includes a map that identifies liquefaction hazard zones. Most of the approximately 256 acres that are within the identified liquefaction hazard zones are in the southeastern portion of Laguna Woods; however, small areas that are subject to liquefaction hazards also exist in the northern and western part of Laguna Woods. Areas within these hazard zones may experience liquefaction during extreme ground shaking.

Landslides, which can occur as a result of seismic activity or as an independent event, have the potential to cause loss of life, personal injury, economic loss, and property damage in Laguna Woods. The City's Safety Element includes a map that shows the locations of the approximately 77 acres that are prone to earthquake-induced landslides. Most of the areas that are subject to landslides are in the western half of Laguna Woods.

5.3 WILDFIRES

According to the City's Safety Element, wildfires in the open space and wildland-urban interface area that borders the westernmost edge of Laguna Woods could cause loss of life, personal injury, and extensive property damage, including damage to open space resources. Consequently, fires are considered to pose a very significant risk. In 2012, the City Council designated three fire hazard severity zones (very high, high, and moderate) within the wildland-urban interface area shown in the Safety Element. The Very High Fire Hazard Severity Zone was identified by the California Department of Forestry and Fire Protection (CAL FIRE), while the High and Moderate Fire Hazard Severity Zones were identified by OCFA based on an assessment of vegetation, slope, fire history, weather patterns, and impact of flames, heat, and flying embers. Collectively, those zones and the 2,564 residential dwelling units within them face the highest risk of wildfire impacts. However, OCFA has developed a number of resources that are intended to mitigate fire risk through vegetation management, including technical guidelines for developing fuel modification plans for new construction projects and maintaining and managing vegetation on properties within fire hazard areas.

5.4 NOISE

Noise generated from mobile sources such as traffic on City streets and Interstate 5 (I-5) and aircraft flyovers will continue to have the greatest potential impact on the City's land use decisions. The City's Noise Element describes the existing noise environment using maps that identify several areas with high levels of noise. The Noise Element also identifies noise sources and contains goals and policies that will be useful in reducing the effects of noise, if not the actual intensity of noise. Land

use policy discourages the placement of noise-sensitive land uses in areas that are subject to high noise levels. The City requires new housing developments to provide an acoustic analysis and provide necessary mitigation, such as barriers or additional sound insulation, for projects located within the 65 CNEL noise contour zones identified in the Noise Element. According to the Noise Element, areas adjacent to the following road segments are either already within the 65 CNEL noise contour or are projected to be in future General Plan build-out:

- El Toro Road (Aliso Creek Road to Paseo de Valencia)
- Moulton Parkway (Gate 12 south to City limits)
- Santa Maria Avenue (Avenida Sosiega to Santa Vittoria Drive)

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EXHIBIT C

HOUSING SITES INVENTORY AND ANALYSIS

CITY OF LAGUNA WOODS

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LSA

February 2022

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HOUSING SITES INVENTORY AND ANALYSIS

CITY OF LAGUNA WOODS

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February 2022

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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).

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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.

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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



LSA

- LEGEND
- Housing Site (with Site ID#)
 - City of Laguna Woods
 - Laguna Woods Village

FIGURE 1

City of Laguna Woods
2021-2029 Housing Element Update
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, 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 community and are, therefore, not likely to vacate their current locations. Such businesses included grocery stores, banks, and pharmacies.

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).

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 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.

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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 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.

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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

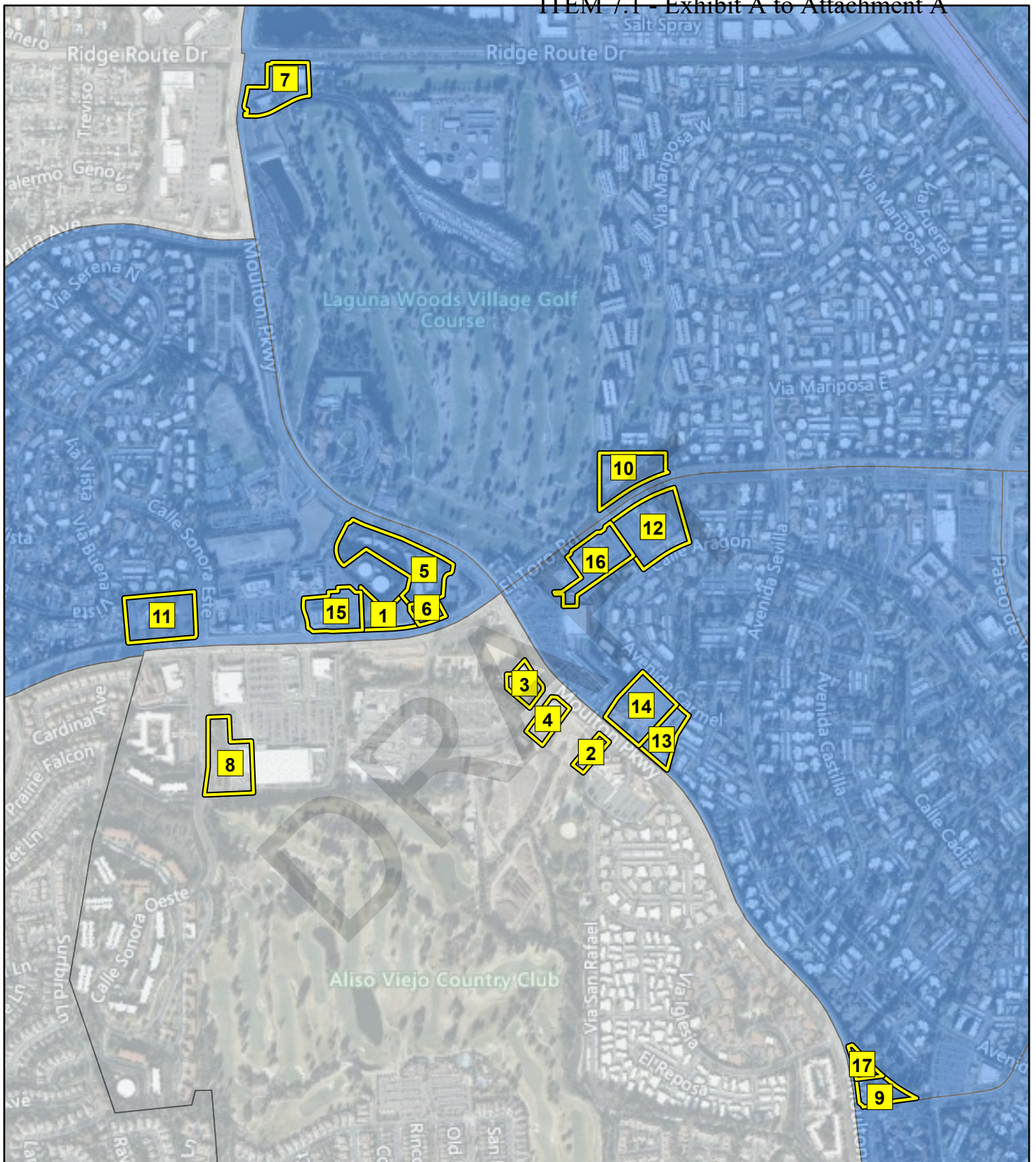
Figure 2, Poverty Status, identifies the percentage of the population in each Laguna Woods census tract whose income in the past 12 months was below the poverty level, based on the 2015–2019 American Community Survey estimates. Figure 2 also identifies the locations of the 17 potential housing sites. 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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Housing Sites

Poverty Status (Tract) - ACS (2015-2019)

Percent of Population whose income in the past 12 months is below poverty level

< 10%

10% - 20%



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FIGURE 2

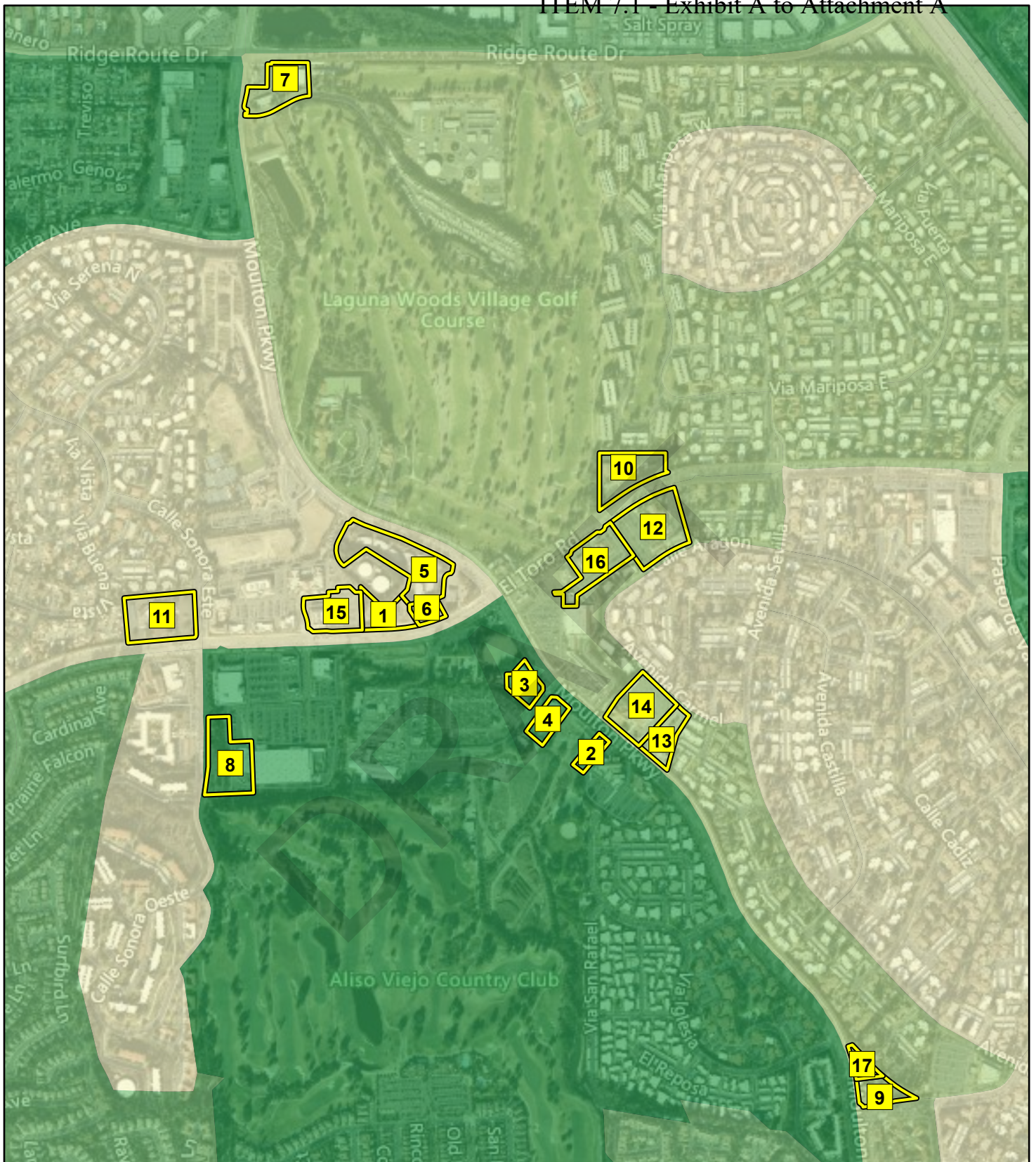
Laguna Woods Residential Site Inventory
Poverty Status

SOURCE: Bing (2018); City of Laguna Woods (5/2021); California Tax Credit Allocation Committee (2021)

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LEGEND

 Housing Sites

2018 Diversity Index (Esri)

Lower Diversity

≤55.0%

≤70.0%

≤85.0%



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FIGURE 3

Laguna Woods Residential Site Inventory
Diversity Index

SOURCE: Bing (2018); City of Laguna Woods (5/2021); California Tax Credit Allocation Committee (2021)

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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.

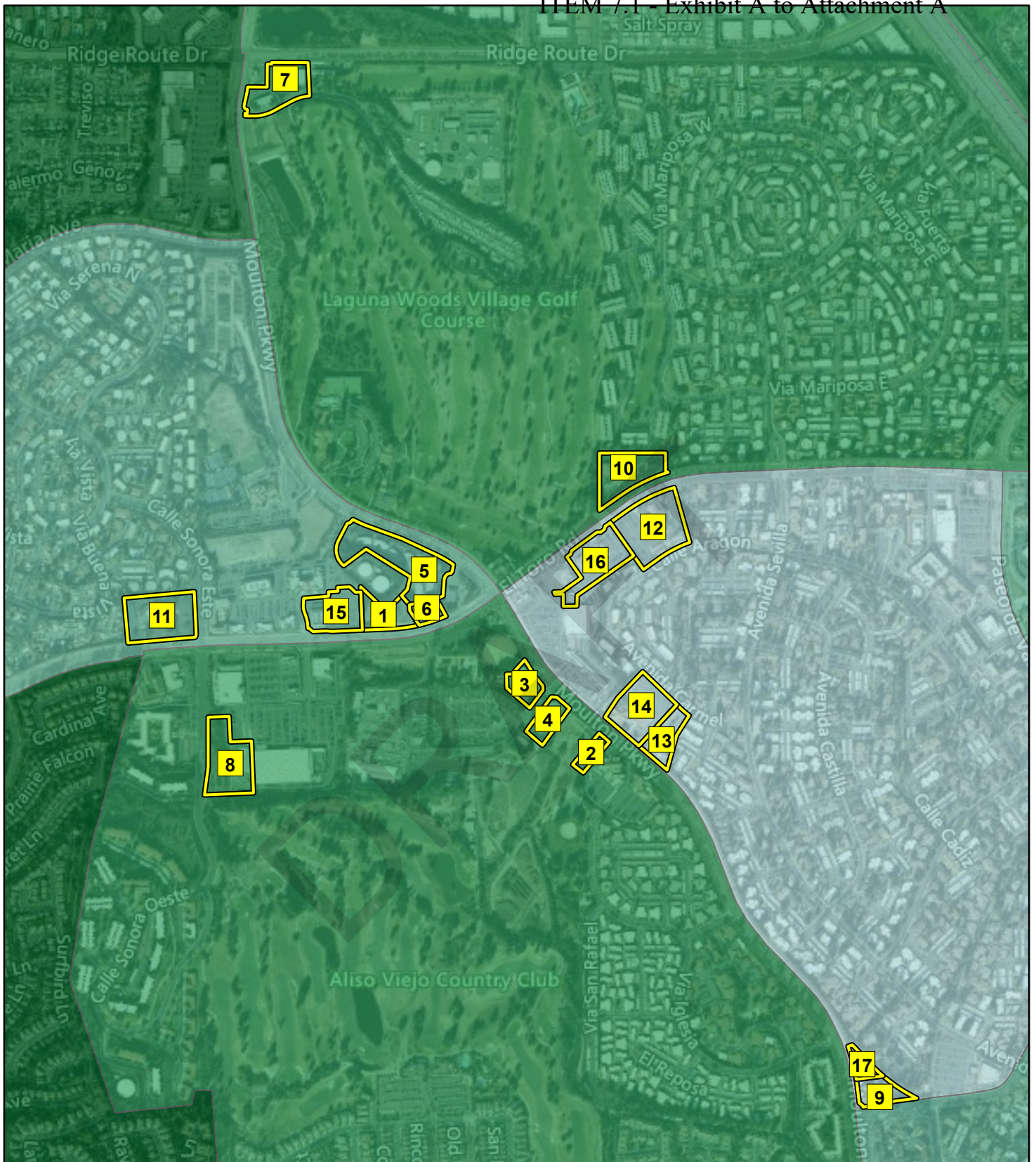
Based on this analysis, Sites 1, 5, 6, 7, 8, 11, and 15 are preferable for affordable housing development due to their higher HPI scores, which would affirmatively further fair housing.

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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LEGEND

Housing Sites

Healthy Places Index

20% - 40%

40% - 60%

60% - 80%

80% - 100%



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FIGURE 4

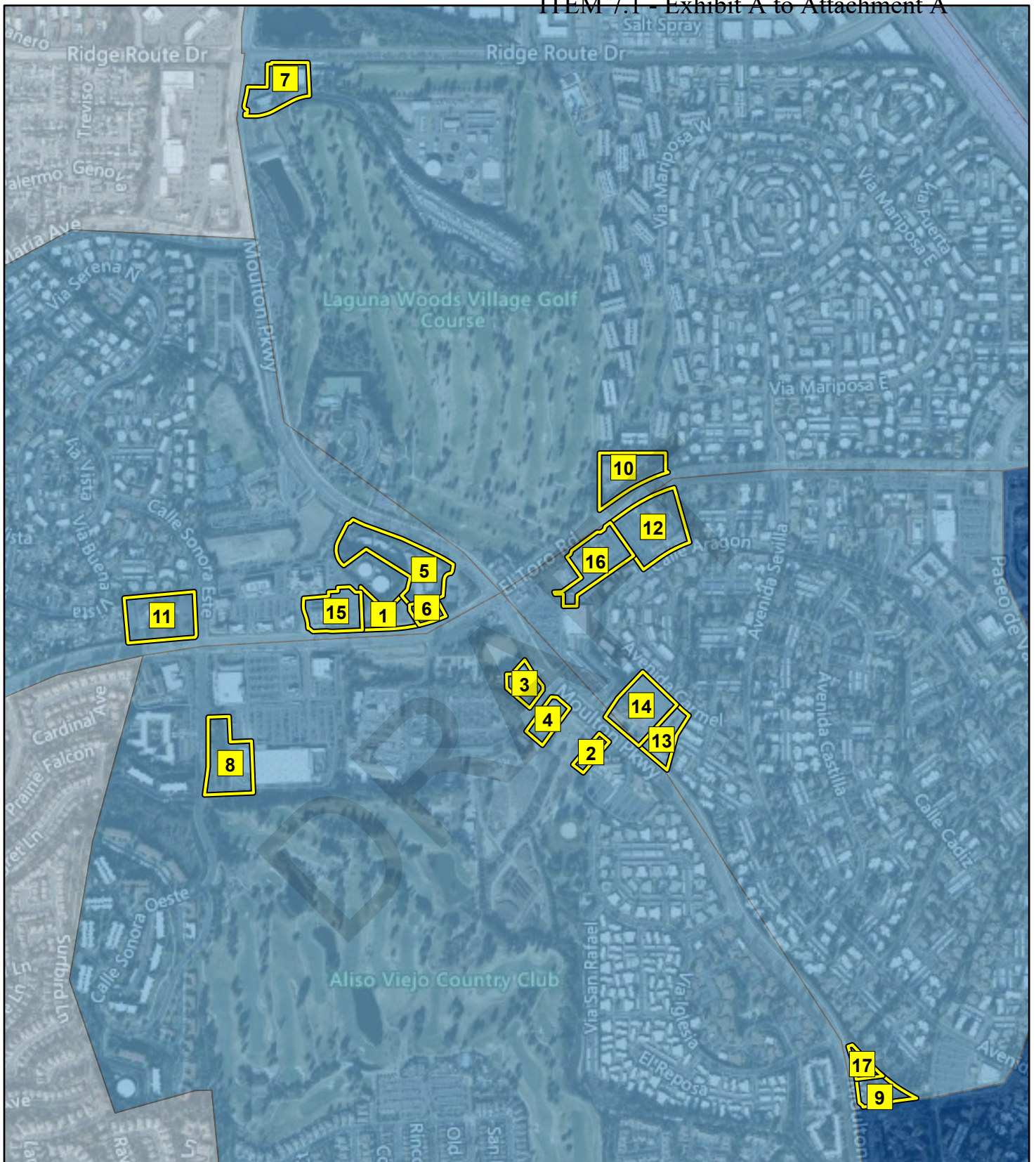
Laguna Woods Residential Site Inventory
Healthy Places Index

SOURCE: Bing (2018); City of Laguna Woods (5/2021); California Tax Credit Allocation Committee (2021)

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LEGEND

 Housing Sites

Social Vulnerability Index - (CDC, 2018)

 Lower Vulnerability

 Higher Vulnerability

 Higher Vulnerability



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FEET

FIGURE 5

Laguna Woods Residential Site Inventory
Social Vulnerability Index

SOURCE: Bing (2018); City of Laguna Woods (5/2021); California Tax Credit Allocation Committee (2021)

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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

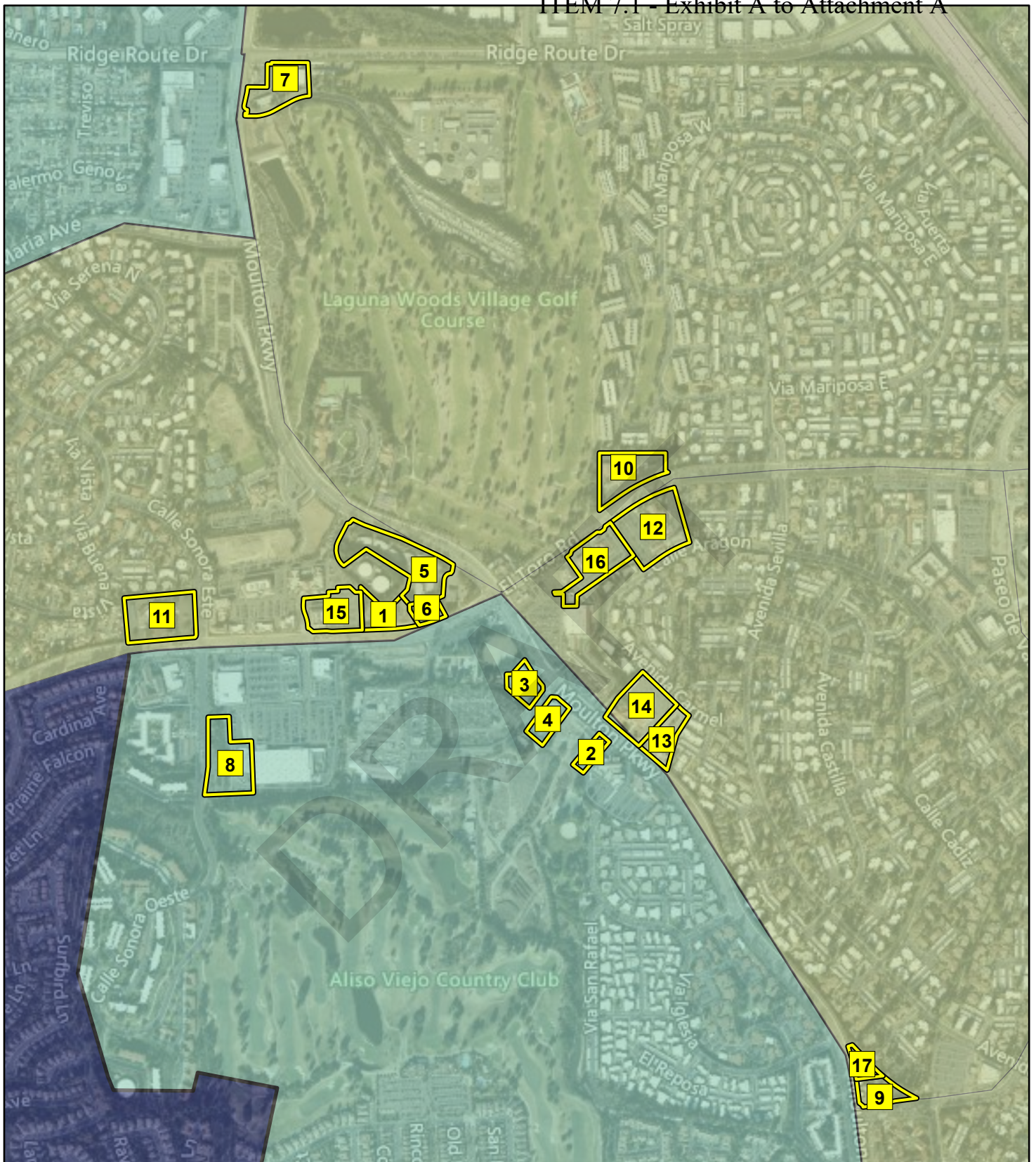
Source: California Fair Housing Task Force. 2020. Methodology for the 2020 TCAC/HCD Opportunity Maps. June.

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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LEGEND

Housing Sites

TCAC Opportunity Areas 2021 - Composite Score

Highest Resource

Moderate Resource (Rapidly Changing)

Low Resource



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FIGURE 6

SOURCE: Bing (2018); City of Laguna Woods (5/2021); California Tax Credit Allocation Committee (2021)

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Laguna Woods Residential Site Inventory
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 proximity of those sites 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 (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."

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.

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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 D

**HOUSING ELEMENT PERFORMANCE
ASSESSMENT**

CITY OF LAGUNA WOODS

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January 2022

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EXHIBIT D

HOUSING ELEMENT PERFORMANCE ASSESSMENT

CITY OF LAGUNA WOODS

Submitted to:

City of Laguna Woods
24264 El Toro Road
Laguna Woods, California 92637

Prepared by:

LSA
20 Executive Park, Suite 200
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(949) 553-0666

Project No. LWD2101



January 2022

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1.0 PROGRESS IN IMPLEMENTATION

Pursuant to Government Code Section 65588, each local government shall review its housing element as frequently as appropriate to evaluate all of the following: (1) the appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal, (2) the effectiveness of the housing element in attainment of the community's housing goals and objectives, (3) the progress of the city, county, or city and county in implementation of the housing element, and (4) the effectiveness of goals, policies, and related actions to meet the community's special housing needs.

State law requires that each Housing Element include a review of the progress made toward achieving the affordable housing goals of the previous Housing Element, and of the effectiveness and appropriateness of those previously adopted objectives. These results should be quantified where possible, but may be qualitative where necessary.

The City of Laguna Wood's (City) last Housing Element was adopted in 2014, and set forth a series of implementation measures with related objectives and policies for the following issue areas: maintain and improve residential neighborhoods and support quality housing for all residents; promote and encourage the development of housing opportunities to accommodate current and projected housing need; encourage and facilitate the development of affordable housing for all economic segments of the community, especially extremely- and low-income residents; and facilitate housing, transportation, and physical accommodations to aid persons with disabilities. This section reviews the continued appropriateness of these programs, the effectiveness of the current 2014–2021 Housing Element, and the progress in its implementation since 2014.

Table A, below, summarizes the City's progress for each implementation measure identified in the current Housing Element.

Table A: Review of the City of Laguna Wood's General Plan 2014–2021 Housing Element

Housing Element	Implementation Status	Continue/Modify/Delete
Objective 1: Maintain and improve residential neighborhoods and support quality housing for all residents		
Policy 1.A: Work towards full implementation of the 2014–2021 Housing Element objectives, policies, and programs in the Housing element.		
Program 1.A.1: Provide a progress report on the 2014–2021 Housing Element programs and quantified objectives as part of the annual General Plan status reports to the State.	Ongoing: This is the City's normal practice. The City submitted annual progress reports to the Department of Housing and Community Development (HCD) each year during the 2014–2021 Housing Element period.	The City will <u>delete</u> the program and replace it with Program H-4.1.2.
Policy 1.B: Promote, encourage, and facilitate efforts to preserve the City's housing stock.		
Program 1.B.1: Continue to promote on-going building maintenance activities. To promote building maintenance, the City will: <ul style="list-style-type: none"> Identify available funds for building maintenance activities and energy efficiency upgrades. Disseminate public information on available housing programs, such as the energy efficient equipment retrofit program (CDBG) at public counters and the City's website. Assist property owners and property managers in their efforts to identify and mitigate housing maintenance issues. 	Ongoing: In 2010, the City obtained a California Energy Commission grant using federal funds to retrofit City Hall with dual-pane, low-E windows and energy efficient lighting and heating, ventilation, and air conditioning equipment. The project modeled energy efficiency retrofits to property owners and property managers. Through June 2017, the City offered a CDBG funded Residential Energy Efficiency Improvement Program. The City provides resources and assistance daily regarding housing maintenance at the building counter and via building inspections.	The City will <u>delete</u> the program and replace it with programs H-2.1.1, 2.2.1, and 2.2.3.
Objective 2: Promote and encourage the development of housing opportunities to accommodate current and projected housing need.		
Policy 2.A: Promote construction of units consistent with the new construction needs identified in the Regional Housing Needs Assessment (RHNA).		
Program 2.A.1: Work with property owners in the development of Specific Plans to guide the development of Urban Activities Center parcels to include residential development.	Abandoned: In 2017, after receiving an application from the property owner, the City amended the Land Use Element of the City's General Plan to delete the Urban Activities Center land use designation. All properties formerly designated as Urban Activities Center have been re-designated and rezoned.	The City will <u>delete</u> the program as the City has deleted the Urban Activities Center land use designation from the General Plan.
Program 2.A.2: Work with commercial property owners to establish residential/commercial mixed use development standards for the City's Commercial land use district.	Not yet Implemented: Sufficient housing opportunities to accommodate the City's 2014–2021 RHNA allocation exist without the establishment of mixed use development standards.	The City will <u>delete</u> the program and replace it with a new rezoning program. See Program H-1.1.1.

Table A: Review of the City of Laguna Wood's General Plan 2014–2021 Housing Element

Housing Element	Implementation Status	Continue/Modify/Delete
Policy 2.B: Mitigate governmental constraints to the accommodation of special needs residents.		
Program 2.B.1: Participate in the County of Orange Consolidated Plan program and in the Continuum of Care to provide housing for special needs populations, particularly extremely and very low income persons. Participation will include assigning a representative to participate in meetings and events sponsored by these programs. In addition, the Resource Guide for Orange County Homeless and other publications that support the program goals will be distributed from City Hall.	Ongoing: The City participated in the development of the County of Orange's Consolidated Plan for the years 2010 to 2015, and 2015 to 2019. In 2015, the City hosted one of the County of Orange's Consolidated Plan Community Workshops at City Hall. Various homeless resources, including County of Orange-produced resources, are available from City Hall.	The City will <u>delete</u> the program and replace it with other programs to address the needs of the specified populations.
Program 2.B.2: Revise the Laguna Woods Zoning Ordinance to identify zones that will allow the development of transitional housing [and] facilitate transitional housing and supportive housing developments that serve extremely and very low income households, consistent with Government Code Section 65583(c)(1). Because transitional and supportive housing can be configured in different ways – either as regular multi-family housing or as group quarters – the Zoning Ordinance amendment will ensure that transitional and supportive housing that function as a residential use will be treated as residential uses and only subject to those restrictions that apply to other residential uses of the same type in the same zone.	Implemented: Chapter 13.23 of the Laguna Woods Municipal Code, adopted in 2011. Laguna Woods Municipal Code amended in 2018, see Ordinance No. 18-05.	The City will <u>delete</u> the program and replace it with programs H-1.3.1, 1.3.2, and 1.3.3.
Program 2.B.3: Review and revise the Laguna Woods Zoning Ordinance 13.23 in regards to emergency homeless shelters to ensure compliance with Government Code Section 65583(a)(4).	Implemented: Chapter 13.23 of the Laguna Woods Municipal Code, adopted in 2011, was amended in 2018.	The City will <u>delete</u> the program and replace it with Program 1.5.1.
Objective 3: Encourage and facilitate the development of affordable housing for all economic segments of the community, especially extremely- and low-income residents.		
Policy 3.A: Recognize the City's leadership role in the maintenance, preservation, improvement, and development of affordable housing.		
Program 3.A.1: Encourage and facilitate the development of affordable housing by: <ul style="list-style-type: none"> Supporting non-profit organizations that address housing issues. Serving as an intermediary between non-profit organizations and interested residential developers. Assisting in application preparation and other efforts to secure funding sources for development of housing for extremely low-, very low-, low- and 	Ongoing: The City encourages the development of affordable housing as required by State law. Resources, information, and assistance for developers and other interested parties are available from City Hall. Seventeen (17) specifically designated affordable housing units are located in Laguna Woods. From 2014 to 2020, the City received no applications for any new housing development projects	The City will <u>delete</u> the program as the Housing Element includes various programs to assist in the development of affordable housing.

Table A: Review of the City of Laguna Wood's General Plan 2014–2021 Housing Element

Housing Element	Implementation Status	Continue/Modify/Delete
<p>moderate-income residents.</p> <ul style="list-style-type: none"> • Making available regional and local housing program information to residents, and assisting residents in contacting housing assistance organizations. • Inform interested developers about the range of housing allowed in areas outside of Laguna Woods Village, including housing for families. • Inform interested developers about the State density bonus program incentives available for development of affordable housing. 	(affordable as well as market rate housing developments).	
Program 3.A.2: Continue to encourage and facilitate the use of the City's density bonus provisions to provide affordable housing opportunities. Revise the density bonus provisions as necessary in the City's Municipal Code to be consistent with State density bonus law.	Ongoing: Section 13.26.040 of the Laguna Woods Municipal Code, adopted in 2013; Laguna Woods Municipal Code amended in 2018; see Ordinance No. 18-03 and amended in 2020; see Ordinance No. 20-02.	The City will <u>delete</u> the program as the City's residential density bonus standards are consistent with state law.
Program 3.A.3: Encourage residents to apply, when available, for the Section 8 rental assistance program (through County of Orange Housing Authority) for extremely and very low-income rental households. Inform local rental property owners and eligible residents of Section 8 assistance and Section 8 waitlist openings through flyers and the City's website. Provide technical assistance during the application process to interested residents. While the City endeavors to maintain the current level of assistance through the Section 8 (72 vouchers) program, the City has no jurisdiction over the funding and operation of the Section 8 voucher program.	Ongoing: The City receives information and application forms for Section 8 housing through the County of Orange and makes them available to residents from City Hall.	The City will <u>delete</u> the program as the City provides referrals to the OC Housing Authority as a normal business practice.
Program 3.A.4: Continue to use CDBG funds to fund projects that improve and maintain the quality of the City's housing stock and residential infrastructure. While the City endeavors to maintain the current level of assistance through the CDBG program, the City has no jurisdiction over the funding and operation of the CDBG program.	Ongoing: Through June 2017, the City offered a CDBG-funded Residential Energy Efficiency Improvement Program. Uncertainty surrounding the future availability of CDBG funds, as well as the impact of increasing compliance requirements and law enforcement costs on City resources, resulted in the end of the program. Staff continues to evaluate other potential, future uses of CDBG housing rehabilitation funds.	The City will <u>delete</u> the program. See programs H-2.1.1, 2.2.1, and 2.2.3.

Table A: Review of the City of Laguna Wood's General Plan 2014–2021 Housing Element

Housing Element	Implementation Status	Continue/Modify/Delete
Program 3.A.5: The City has received no complaints regarding any discriminatory actions and will continue to enforce all fair housing laws. The City Manager is responsible for addressing and/or referring fair housing complaints and questions to the Fair Housing Council of Orange and/or HUD. The City will provide information on fair housing rights and responsibilities, and seek to remedy known acts of discrimination within the community. The City will disseminate fair housing information at City Hall and throughout Laguna Woods in a variety of community places.	Ongoing: Fair housing assistance, resources, and information is available from City Hall, through the City's code enforcement operation, and upon request.	The City will <u>delete</u> the program and replace it with Priority Issue 3.
Program 3.A.6: Review city processes and procedures as they pertain to the establishment of new housing, including market rate and all forms of affordable housing to remove undue constraints which hinder the development of new housing opportunities.	Ongoing: City staff has identified no undue constraints which hinder the development of new housing opportunities.	The City will <u>delete</u> the program as the Housing Element includes various programs related to updating City processes and procedures.
Program 3.A.7: Research potential funding sources (grants, loans, and other funds) which can be used towards the planning and development of affordable housing.	Ongoing: City staff continues to explore sources of funding to assist with affordable housing development.	The City will <u>delete</u> the program as the Housing Element includes various programs to assist in the development of affordable housing.
Objective 4: Facilitate housing, transportation and physical accommodations to aid persons with disabilities.		
Policy 4.A: Maintain zoning/development standards that guide development of affordable housing near public transportation, and promote project designs that are accessible and accommodating to the disabled.		
Program 4.A.1: Partner with property owners to identify and accomplish the retrofit of dwelling units and common facilities for handicapped accessibility. The City will participate at board meetings of the housing mutuals and the Golden Rain Foundation, the principal property owner in the City, to encourage retrofitting.	Not yet Implemented: While City officials often meet with the representatives of major property owners, a mutual approach to promoting retrofitting within the community is yet to be developed.	The City will <u>delete</u> the program and replace it with programs H-2.2.1 and 2.2.3.

CDBG = Community Development Block Grant

City = City of Laguna Woods

HCD = California Department of Housing and Community Development

HUD = United States Department of Housing and Urban Development

2.0 EFFECTIVENESS OF THE ELEMENT/SPECIAL NEEDS POPULATIONS

The 2014–2021 Housing Element resulted in changes to the Laguna Woods Zoning Ordinance that resulted in compliance of emergency homeless shelters with State law, as well as identification of zones that allow the development of transitional housing and facilitation of transitional housing and supportive housing developments that serve extremely- and very-low income households in those zones. For the reasons set forth in Table A, the City was unable to complete certain programs included in the 2014–2021 Housing Element, such as the creation of the two new housing units set by the Regional Housing Needs Assessment (RHNA) for the 5th Housing Element Cycle; working with property owners in the development of Specific Plans to guide the development of Urban Activities Center parcels to include residential development; the establishment of residential/commercial mixed use development standards for the City's Commercial land use district; and the retrofit of dwelling units and common facilities for handicapped accessibility. Overall, the 2014–2021 Housing Element was effective in providing fair housing assistance, resources, and information to residents participating in the County of Orange Consolidated Program to provide housing for special needs populations, particularly extremely and very-low income persons, and continuing to maintain and improve residential neighborhoods.

Refer to Table A in the previous section for a discussion of whether the programs included in the 2014–2021 Housing Element should be continued, modified, or deleted based on their effectiveness. Table A also addresses various programs related to the housing needs of special needs populations (Programs 2.B.1, 2.B.2, 2.B.3, 3.A.1, and 4.A.1).

3.0 APPROPRIATENESS OF GOALS, OBJECTIVES, POLICIES, AND PROGRAMS

The 2014–2021 Housing Element established a comprehensive and firm basis for the City to move forward towards the achievement of the goals, policies, and programs in the document. As a result, Table A shows that many of the programs were achieved or implemented. Some major amendments included in the 2021–2029 Housing Element incorporate what has been learned from the results of the 2014–2021 Housing Element, including:

- Inclusion of a frequently asked questions (FAQs) section for the RHNA process to promote clarity and a common understanding of both the RHNA process and the City’s associated obligations.
- Inclusion of “goals” in addition to “policy objectives” to provide declarative statements that set forth the City’s approach to each of the priority issues.
- Objective 2 in the 2014–2021 Housing Element evolved into Policy Objective H-1.1 in the 2021–2029 Housing Element, which includes making sites available to accommodate current and projected housing needs for groups of all income levels in accordance with California Government Code Section 65583(c)(1). For implementation of Policy Objective H-1.1, the following program was added:
 - Rezone the 17 potential housing sites identified in the Housing Sites Inventory and Analysis to accommodate the City’s housing needs allocation.
- Objective 3 in the 2014–2021 Housing Element evolved into Policy Objective H-1.2 in the 2021–2029 Housing Element, which states that the City should assist in developing adequate housing to meeting the needs of extremely low, very low- low, and moderate-income households. For implementation of Policy Objective H-1.2, the following programs were added:
 - Prepare and maintain a webpage with information related to the 17 potential housing sites identified in the Housing Sites Inventory and Analysis, including a Geographic Information System (GIS) map layer with geospatial information.
 - 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.
 - 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 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.

- Adopt an ordinance waiving or reducing City building permit fees for 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.
- Amend various, existing housing-related provisions of the Laguna Woods Municipal Code to promote regulatory clarity.
- 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.
- Objective 4 in the 2014–2021 Housing Element evolved into Policy Objective H-1.3 in the 2021–2029 Housing Element, which effectively changes the wording to provide reasonable accommodations for housing that is not only designed for persons with disabilities, but also intended for occupancy by or with supportive services for persons with disabilities. For implementation of Policy Objective H-1.3, the following programs were added:
 - 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.
 - 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.
 - Continue to allow 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).
 - Amend various, existing housing-related provisions of the Laguna Woods Municipal Code to conform to state law.
- The creation of a new objective, Policy Objective H-1.4, which incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent for very low, low-, or moderate-income households.
- The creation of a new objective, Policy Objective H-1.5, which makes sites available to accommodate emergency housing needs for homeless persons and families.
- Objective 1 in the 2014–2021 Housing Element evolved into Policy Objective H-2.1, Policy Objective H-2.2, and Policy Objective H-2.3, which add promotion of accessible and accommodating housing options for persons with special needs and promotion of housing

conservation and revitalization. For implementation of Policy Objectives H-2.1, H-2.2, and H-2.3, the following programs were added:

- 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.
- Investigate potential incentives for property owners to extend existing affordability covenants beyond the planned expiration date. If feasible and economical, adopt such incentives.
- 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.
- 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.
- 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.
- 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.
- Program 3.A.5 in the 2014–2021 Housing Element was expanded to Goal H-3 in the 2021–2029 Housing Element, which involves the administration of housing and community development programs and activities in a manner to affirmatively further fair housing. Goal H-3 includes policy objectives and implementation programs relating to the following:
 - Enhancing housing mobility and protecting existing residents from displacement.
- The creation of a new goal, Goal H-4, with its own set of policy objectives, which calls for analysis related to Housing Element implementation. This includes annual monitoring of the newly adopted Housing Element and coordination of the implementation of the newly adopted Housing Element with water and sewer agencies.

This update to the Housing Element revises existing programs and includes new programs, where appropriate, to ensure that the document reflects the City's priorities and that updated

requirements of California State law are addressed. Refer to the General Plan for the goals, policies, and programs of this Housing Element.

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4.0 ASSEMBLY BILL 1233 – SHORTFALL OF SITES FROM THE 5TH CYCLE PLANNING PERIOD

According to the annual progress reports (APRs) provided to the California Department of Housing and Community Development (HCD), the RHNA quantified the need for housing within the City to be two new housing units during the 5th Cycle planning period. However, no new housing units were built in the City, indicating a shortfall of new housing units triggering the provisions of Government Code Section 65584.09.

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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).

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2.0 SUMMARY OF EFFORTS

The Southern California Association of Governments (SCAG) approved its 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 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 to the City in a letter dated 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 of 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 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.

Comment 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 were provided to each commenting party via mail and email on January 26, 2022. 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 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.

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.>

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.

ITEM 7.1

Exhibit B to Attachment A

Initial Study/Negative Declaration

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CITY OF LAGUNA WOODS **2021-2029 GENERAL PLAN** **HOUSING ELEMENT UPDATE** *Final Initial Study/Negative Declaration*



City of Laguna Woods

January 2022

Prepared by:

LSA



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FINAL

**INITIAL STUDY/
NEGATIVE DECLARATION**

**2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE
CITY OF LAGUNA WOODS**



January 2022

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FINAL

**INITIAL STUDY/
NEGATIVE DECLARATION**

**2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE
CITY OF LAGUNA WOODS**

Submitted to:

City of Laguna Woods
24264 El Toro Road
Laguna Woods, California 92637

Prepared by:

LSA
20 Executive Park, Suite 200
Irvine, California 92614
(949) 553-0666
Project No. LWD2101



January 2022

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APPENDIX

A: DRAFT INITIAL STUDY/NEGATIVE DECLARATION

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LIST OF ACRONYMS AND ABBREVIATIONS

Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
City	City of Laguna Woods
HCD	California Department of Housing and Community Development
IS/ND	Initial Study/Negative Declaration
NOI	Notice of Intent
project	City of Laguna Woods 2021–2029 General Plan Housing Element Update
RHNA	Regional Housing Needs Assessment
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
VMT	vehicle miles traveled

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1.0 INTRODUCTION

This section comprises the Comments and Responses of the Final Initial Study/Negative Declaration (IS/ND) for the proposed City of Laguna Woods 2021–2029 General Plan Housing Element Update (project) in Laguna Woods, Orange County, California. The purpose of this document is to respond to all comments received by the City of Laguna Woods (City) regarding the environmental information and analyses contained in the Draft IS/ND (the Draft IS/ND is provided as Appendix A).

Consistent with *State CEQA Guidelines* Section 15073 and in accordance with the City's Local CEQA Procedures, a Notice of Intent (NOI) to adopt a Negative Declaration was sent to responsible agencies and trustee agencies in addition to various public agencies, citizen groups, and interested individuals concerned with the project. In addition, the NOI was filed with the Orange County Clerk-Recorder's Department and the State Clearinghouse on August 17, 2021.

The Draft IS/ND circulated for public review for a period of 31 days, from August 17, 2021, to September 16, 2021. Copies of the Draft IS/ND were made available for public review at the City Clerk's Office at Laguna Woods City Hall and on the City's website.

Comments were accepted for a period of 31 days to ensure adequate time for residents and agencies to comment on the Draft IS/ND. Six comment letters were received during the public review period. Comments were received from one State agency, the California Department of Transportation (Caltrans); four local agencies, the Saddleback Valley Unified School District, the Orange County Fire Authority, the City of Irvine, and the Southern California Association of Governments;; and one interested party: the Gabrieleno Band of Mission Indians Kizh Nation.

The City is the Lead Agency under the California Environmental Quality Act (CEQA) and is required to consider agency and public comments on the IS/ND. Although preparation of responses to comments on an IS/ND is not required, responses have been prepared.

Information provided in this Response to Comments document clarifies, amplifies, or makes minor modifications to the IS/ND. No significant changes have been made to the information contained in the IS/ND as a result of the responses to comments, no significant new information has been added that would require recirculation of the document, and the CEQA findings have remained unchanged.

1.1 INDEX OF COMMENTS RECEIVED

The following is an index list of the agencies and interested parties that commented on the IS/ND prior to the close of the public comment period. The comments received have been organized in a manner that facilitates a particular comment or set of comments. Each comment letter received is indexed with an alphanumeric code below.

Comment Letter Index

Comment Code	Signatory	Date
State Agencies		
S-1	California Department of Transportation (Caltrans)	September 16, 2021
Local Agencies		
L-1	Saddleback Valley Unified School District	September 1, 2021
L-2	Orange County Fire Authority	August 26, 2021
L-3	City of Irvine	September 16, 2021
L-4	Southern California Association of Governments	September 16, 2021
Interested Parties		
I-1	Gabrielino Band of Mission Indians Kizh Nation	August 24, 2021
I-2	Gabrielino Tongva Tribe	September 12, 2021
I-3	Juaneño Band of Mission Indians, Acjachemen Nation	September 16, 2021

1.2 FORMAT OF RESPONSE TO COMMENTS

Responses to each of the comment letters are provided on the following pages. The comment index numbers are provided in the upper right-hand corner of each comment letter, and individual points within each letter are numbered along the right-hand margin of each letter. The City's responses to each comment letter immediately follow the letter and are referenced by index numbers in the margins.

2.0 RESPONSE TO COMMENTS

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2.1 STATE AGENCIES

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ITEM 7.1 - Exhibit B to Attachment A

Comment Letter S-1



Making Conservation
a California Way of Life.

DEPARTMENT OF TRANSPORTATION

DISTRICT 12

1750 EAST FOURTH STREET, SUITE 100

SANTA ANA, CA 92705

PHONE (657) 328-6000

FAX (657) 328-6522

TTY 711

www.dot.ca.gov/caltrans-near-me/district12

September 16, 2021

Mr. Christopher Macon
City Manager
City of Laguna Woods
24264 El Toro Road
Laguna Woods, CA 92637

File: IGR/CEQA
SCH#: 2021080313
12-ORA-2021-01759
SR 133, PM R4.534-R6.548
I-5, PM 17.821-19.386
SR 73, PM 14.819-16.282

Dear Mr. Macon,

Thank you for including the California Department of Transportation (Caltrans) in the review of the 2021-2029 General Plan Housing Element Update for the City of Laguna Woods. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment.

The project proposes an update to the Housing Element in the City's General Plan. Regional access to the project area is provided by State Route 133 (SR 133), Interstate 5 (I-5), and State Route 73 (SR 73). Caltrans is a responsible agency for this project and upon review, we have the following comments:

S-1-1**Transportation Planning**

1. Caltrans recognizes our responsibility to assist communities of color and under-served communities by removing barriers to provide a more equitable transportation system for all.

The Department firmly embraces racial equity, inclusion, and diversity. These values are foundational to achieving our vision of a cleaner, safer, and more accessible and more connected transportation system.

Please consider including a discussion on equity in General Plan Element updates.

S-1-2

2. Caltrans supports the city's evaluation of 17 potential opportunity sites for housing in areas that are already designated for residential, commercial, or community facilities development.

The state mandates that cities must plan for housing needs of future residents of all incomes. This analysis would assist in accommodating the Regional Housing Needs Assessment (RHNA) allocation per the California Department of Housing & Community Development (HCD).

S-1-3

3. Caltrans supports projects which provide a diversity of housing choices and destinations accessible by Active Transportation (i.e. bicycle and pedestrian) and transit users. Please consider improving multimodal connections to housing which will encourage future residents, visitors, and workers in the city to utilize all modes of transportation.

S-1-4

4. Any pedestrian facility enhancements from future housing development projects that are within Caltrans' Right of Way will need to comply with Caltrans Design Information Bulletin (DIB) 82-06. The aforementioned DIB can be found here: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/dib82-06-ally.pdf>

S-1-5

5. According to Government Code 65302, "upon the next revision of the Housing Element on or after January 1, 2020, the Safety Element shall be reviewed and updated as necessary to identify residential developments in any hazard areas identified in the Safety Element that do not have at least two emergency evacuation routes."

Safety elements are also now required to include more information about wildfire risks in the community and how to improve wildfire safety. As well as identifying new information related to flood hazards and climate adaptation and resiliency strategies applicable to the city.

S-1-6

For further information regarding required background information and policy program guidance for Safety Element updates, please see <https://leginfo.legislature.ca.gov>.

6. Safety is one of Caltrans' strategic goals. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners.

We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

S-1-7

Traffic Impact Study

7. New developments resulting from the City's Housing Element update should provide a Vehicle Miles Traveled (VMT) based Traffic Impact Study (TIS). Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts
8. The TIS may also need to identify the future project's near-term and long-term safety or operational issues, on or adjacent to any existing or proposed State facilities.

S-1-8

Encroachment Permit

9. Any project work proposed in the vicinity of the State Right-of-Way (ROW) would require an encroachment permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans's requirements for work done within State ROW, additional documentation would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual at:

<http://www.dot.ca.gov/hq/traffops/developserv/permits/>

S-1-9

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Joseph Jamoralin at (657) 328-6276 or Joseph.Jamoralin@dot.ca.gov

S-1-10

Sincerely,



SCOTT SHELLEY
Branch Chief, Regional-IGR-Transit Planning
Caltrans, District 12

CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)**Letter Code:** S-1**Commenter:** California Department of Transportation**Date:** September 16, 2021**Response to Comment S-1-1**

The commenter thanks the City of Laguna Woods (City) for an opportunity to comment on the new Housing Element and expresses its understanding of the intentions and terms of the Housing Element Update.

This comment is introductory and does not contain any substantive comments or questions; therefore, no response is required.

Response to Comment S-1-2

This comment recommends that the City to include a discussion on equity in General Plan Element Updates.

The City acknowledges this comment; however, as it pertains to the Housing Element Update, it may be noted that Laguna Woods does not contain any disadvantaged communities. This comment has been noted. No changes to the Draft IS/ND have been made in response to this comment.

Response to Comment S-1-3

This comment indicates support for the City's evaluation of 17 potential opportunity sites for housing in areas that are already designated for residential, commercial, or community facilities development.

The City has noted this comment, and because it does not contain any substantive questions about the environmental analysis or conclusions contained in the Draft IS/ND, no further response is required.

Response to Comment S-1-4

This comment states the commenter's support for projects that promote diversity of housing choices and destinations accessible by active transportation and transit users. The commenter asks that the City consider improving multimodal connections to housing, which would encourage future residents, visitors, and workers in Laguna Woods to use all modes of transportation.

The 2021–2029 General Plan Housing Element contains information and data, including an assessment of actual and potential constraints to the provision and maintenance of affordable housing, that would likely address the concerns relating to housing choices in this comment. As for the comments related to improving multimodal transportation connections to housing, new development would be subject to policies described in the Circulation Element of the General Plan, as well as other policies that promote reduction of vehicle miles traveled (VMT). The proposed

project would not, in and of itself, result in transportation impacts, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. This comment has been noted. No changes to the Draft IS/ND have been made in response to this comment.

Response to Comment S-1-5

This comment relates to compliance with Caltrans Design Information Bulletin 82-06 for pedestrian facility enhancements from future housing development projects.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

Response to Comment S-1-6

This comment relates to compliance with Government Code Section 65302, which requires that local jurisdictions review and update their safety elements to address wildfire and flood hazards and incorporate applicable climate adaptation and resiliency strategies.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

Response to Comment S-1-7

This comment expresses encouragement for the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

Response to Comment S-1-8

This comment states that new developments that result from the Housing Element Update should provide a VMT-based Traffic Impact Study, explains what types of content should be included in the study, and suggests resources that may be used as guidance for developing that study.

The City acknowledges and notes this comment. Future discretionary projects will be reviewed for compliance with CEQA and will address VMT thresholds.

Response to Comment S-1-9

This comment states that any projects that are proposed in the vicinity of the State right-of-way would need an encroachment permit and that all environmental concerns must be adequately

addressed. The commenter then calls for coordination with Caltrans to meet requirements for any work within or near State right-of-way.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

Response to Comment S-1-10

The commenter requests that the City keep it informed of the project and any future developments that could potentially impact State transportation facilities.

The City acknowledges all comments provided by Caltrans and looks forward to working collaboratively on any future projects.

2.2 LOCAL AGENCIES

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ITEM 7.1 - Exhibit B to

25631 Peter A. Hartman Way, Mission Viejo, California 92691
(949) 586-1234
www.svUSD.org

Board of Education

Suzie R. Swartz, President · Amanda Morrell, Vice President ·
Barbara Schulman, Clerk · Dr. Edward Wong, Member · Greg Kunath,
Member

Crystal Turner, Ed.D.
Superintendent

September 1, 2021

Rebecca M. Pennington, Development Programs Analyst
City of Laguna Woods
24264 El Toro Road
Laguna Woods, California 92637

Via Email: cityhall@cityoflagunawoods.org

Subject: Housing Element Update (Negative Declaration/Initial Study)

Thank you for the opportunity to review and comment on the Negative Declaration for the City of Laguna Woods Housing Element Update (Housing Element Update or proposed project). Laguna Woods is within the Saddleback Valley Unified School District (Saddleback Valley USD) boundaries. A portion of the city also lies within the Laguna Beach Unified School District.

The City plans to adopt the 2021-2029 General Plan Housing Element, and we understand that the proposed Housing Element Update would not result in an actual housing development involving ground disturbance that could result in environmental impacts. The Housing Element Update identifies several potential housing sites that are candidates for future housing development. However, because the proposed project does not include the necessary amendments to the City's Zoning Ordinance and other General Plan elements that allow for future housing development, no actual development on these potential sites could occur and result in environmental impacts. We understand that after the State certifies the Housing Element Update, a separate environmental study will be prepared.

The Saddleback Valley USD requests that this subsequent environmental study include an analysis of the proposed project's impacts on Saddleback Valley USD's school facilities. Please continue to notify us of all actions on the Housing Element Update and other resulting development projects and give us an opportunity to review future environmental documents. We look forward to working cooperatively with the City to create the best environment for our students and staff. Please contact me if you have any questions.

Sincerely,

Stella Escario-Doiron
Chief of Facilities, Maintenance, Operations, Construction and Transportation

C: Crystal Turner, Ed.D., Superintendent
Robert Craven, Assistant Superintendent, Facilities, Operations and Technology
Mark Perez, Director, Communications & Administrative Services

Saddleback Valley Unified School District**Letter Code:** L-1**Commenter:** Stella Escario-Doiron – Chief of Facilities, Maintenance, Operations, Construction, and Transportation**Date:** September 1, 2021**Response to Comment L-1-1**

The commenter thanks the City of Laguna Woods (City) for an opportunity to comment on the new Housing Element and expresses understanding of the intentions and terms of the Housing Element Update. The commenter also requests that it remain notified and be given an opportunity to comment on all future updates to the Housing Element and looks forward to working cooperatively with the City.

The City acknowledges the Saddleback Valley Unified School District's comments and looks forward to working collaboratively on any future projects.

Chris Macon

From: Rivers, Tamy <TamyRivers@ocfa.org>
Sent: Thursday, August 26, 2021 4:31 PM
To: City Hall -- City of Laguna Woods
Subject: 2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE

Thank you for the opportunity to review the subject document. OCFA has no comments

L-2-1**Tamera Rivers**

Management Analyst
Orange County Fire Authority
Office: 714-573-6199
tamyrivers@ocfa.org

In service of others!



Orange County Fire Authority

Letter Code: L-2

Commenter: Tamera Rivers – Management Analyst

Date: August 26, 2021

Response to Comment L-2-1

The commenter thanks the City of Laguna Woods (City) for an opportunity to comment on the new Housing Element and expresses that it has no comments to convey.

The City acknowledges Orange County Fire Authority’s review of the IS/ND and looks forward to working collaboratively on any future projects.



September 16, 2021

Ms. Rebecca M. Pennington
Development Program Analyst
City of Laguna Woods
24264 El Toro Road
Laguna Woods, CA 92637
Email: cityhall@cityoflagunawoods.org

Subject: Initial Study/Negative Declaration (IS/ND) for the 2021-2029 General Plan Housing Element Update City of Laguna Woods

Dear Ms. Pennington:

The City is in receipt of an IS/ND for the 2021-2029 General Plan Housing Element Update for the City of Laguna Woods. The draft 2021-2029 General Plan Housing Element incorporates current population and housing projections based on the Regional Housing Needs Assessment (RHNA) adopted by the Southern California Association of Governments in March 2021 for the 6th Cycle Planning Period.

The draft ND examines the potential impacts generated by the proposed project in relation to the Environmental Analysis Checklist categories identified in the City of Laguna Woods' environmental document.

Staff has reviewed the project and has no comments. If you have any questions, please contact Senior Planner Justin Equina at jequina@cityofirvine.org or at 949-724-6364.

Thank you for the opportunity to review the project.

Sincerely,

A handwritten signature in black ink, appearing to be 'Justin Equina'.

Justin Equina
Senior Planner

cc: Marika Poynter, Principal Planner



City of Irvine

Letter Code: L-3

Commenter: Justin Equina – Senior Planner

Date: September 16, 2021

Response to Comment L-3-1

The commenter thanks the City of Laguna Woods (City) for the opportunity to review the project, and acknowledges that it received and reviewed the IS/ND for the Housing Element Update and currently has no comments.

The City acknowledges the comment provided by the City of Irvine and looks forward to working collaboratively on any future projects.



September 16, 2021

Ms. Rebecca M. Pennington, Development Programs Analyst
City of Laguna Woods
24264 El Toro Road
Laguna Woods, California 92637
Phone: (949) 639-0561
E-mail: cityhall@cityoflagunawoods.org

RE: SCAG Comments on the Initial Study/Negative Declaration for the Laguna Woods 2021-2029 General Plan Housing Element Update [SCAG NO. IGR10460]

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

REGIONAL COUNCIL OFFICERS

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**Jan C. Harnik, Riverside County
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Executive/Administration
Clint Lorimore, Eastvale

Community, Economic &
Human Development
Jorge Marquez, Covina

Energy & Environment
David Pollock, Moorpark

Transportation
Sean Ashton, Downey

Dear Ms. Pennington,

Thank you for submitting the Notice of Intent to Adopt a Negative Declaration for the Laguna Woods 2021-2029 General Plan Housing Element Update ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. The proposed project is a Housing Element Update to reflect the Regional Housing Needs Assessment for the 6th Cycle Planning Period.

L-4-1

Based on SCAG staff's review, the Initial Study/Negative Declaration (IS/ND) does not reference the most recently adopted 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). SCAG staff comments are detailed in the attachment to this letter.

L-4-2

When available, please send project related documents and notices to IGR@scag.ca.gov. If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

L-4-3

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

**COMMENTS ON THE NOTICE OF INTENT TO ADOPT A
NEGATIVE DECLARATION FOR THE
LAGUNA WOODS 2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE [SCAG NO. IGR10460]**

SUMMARY

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies.

L-4-4

Based on SCAG staff review, the IS/ND does not reference the most recently adopted 2020 Connect SoCal. SCAG staff recommends including references to Connect SoCal as described in the following sections.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

L-4-5

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

L-4-6

SCAG Staff Comments

SCAG staff recommends that you review 2020 Connect SoCal and consider its adopted goals and policies when finalizing the proposed project.

L-4-7

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

L-4-8

	Adopted SCAG Region Wide Forecasts				Adopted City of Laguna Woods Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	16,303	16,668	16,669	16,532
Households	6,333,458	6,902,821	7,170,110	7,633,451	11,415	11,439	11,418	11,513
Employment	8,695,427	9,303,627	9,566,384	10,048,822	5,762	6,415	6,642	6,809

L-4-8

SCAG Staff Comments

The IS/ND does not refer to Regional Growth Forecasts. SCAG staff recommends that you review the population, housing, and employment trends and forecasts based on the most recently adopted SCAG 2020 Connect SoCal Regional Growth Forecasts to recognize the city's planned growth.

L-4-9

REGIONAL HOUSING NEEDS ALLOCATION

On March 4, 2021 SCAG's Regional Council adopted the [6th cycle Final Regional Housing Needs Assessment \(RHNA\) Allocation Plan](#) which covers the planning period October 2021 through October 2029. The 6th cycle Final RHNA allocation for the applicable jurisdiction is below.

SCAG 6 th Cycle Final RHNA Allocation for City of Laguna Woods	
Income Category	RHNA Allocation (Units)
Very low income	127
Low income	136
Moderate income	192
Above moderate income	542
Total RHNA Allocation	997

Sixth cycle housing elements are due to the California Department of Housing and Community Development (HCD) by October 15, 2021. SCAG encourages jurisdictions to prepare the draft housing element in advance of the due date to ensure adequate time to address HCD comments and adopt a final housing element. Jurisdictions that do not have a compliant housing element may be ineligible for certain State funding and grant opportunities and may be at risk for legal action from stakeholders or HCD.

L-4-10

SCAG staff would like to call your attention to SCAG's [HELPR 2.0](#), a web-mapping tool developed by SCAG to help local jurisdictions and stakeholders understand local land use, site opportunities, and environmental sensitivities for aligning housing planning with the state Department of Housing and Community Development's (HCD) [6th cycle housing element requirements](#).

SCAG Staff Comments

Table 4.14.A: City of Laguna Woods Housing Needs Allocation (2021-2029) on page 4-38 of the IS/ND, and all references to RHNA allocation units in the Draft Housing Element that SCAG staff reviewed, refers to the correct Final RHNA Allocation numbers.

L-4-11

ENVIRONMENTAL JUSTICE***SCAG Staff Comments***

Per [Senate Bill 1000](#) (SB 1000), local jurisdictions in California with disadvantaged communities are required to develop an Environmental Justice (EJ) Element or consider EJ goals, policies, and objectives in their General Plans when updating two or more General Plan Elements. The City of Laguna Woods does not have any disadvantaged communities but if the City would like to consider environmental justice in its General Plan Update, SCAG staff recommends that you review the [Environmental Justice Technical Report](#) and the updated [Environmental Justice Toolbox](#), which is a resource document to assist local jurisdictions in developing EJ-related goals and policies regarding solutions for EJ-related community issues.

L-4-12

Southern California Association of Governments**Letter Code:** L-4**Commenter:** Southern California Association of Governments (SCAG)**Date:** September 16, 2021**Response to Comment L-4-1**

The commenter thanks the City of Laguna Woods (City) for the opportunity to review and comment on the new Housing Element Update.

This comment is introductory and no further response is required.

Response to Comment L-4-2

The commenter states that the IS/ND does not reference the most recently adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the 2020 Connect SoCal RTP/SCS.

Please refer to Responses to Comments L-4-5, L-4-6, and L-4-7 for responses regarding the incorporation of the SCAG RTP/SCS.

Response to Comment L-4-3

The commenter requests that all project-related documents be sent to them electronically, and provides the reviewer's contact information.

The City acknowledges SCAG's participation in providing feedback and contact information and looks forward to continued cooperation with them in the future.

Response to Comment L-4-4

This commenter states that their feedback is intended to assist with implementing projects that have the potential to contribute to RTP/SCS goals and align with RTP/SCS policies. This comment also states that, based on their staff's review, the IS/ND does not reference the most recently adopted 2020 Connect SoCal Plan.

As Chapter 2 of the IS/ND articulates, the draft 2021–2029 General Plan Housing Element contains an analysis and update of housing and population data based on current conditions and sources of information, with revisions incorporating current population and housing projections based on the Regional Housing Needs Assessment (RHNA) SCAG adopted in March 2021 for the 6th Cycle Planning Period. The draft Housing Element contains information and data including, but not limited to, an assessment of housing needs in Laguna Woods; an assessment of actual and potential constraints to the provision and maintenance of affordable housing; an analysis of the City's accomplishments during the 2014–2021 General Plan Housing Element cycle; an evaluation of potential residential development based on the current General Plan and Zoning Ordinance; and the formulation of goals, policies, and programs the City will implement to address a number of housing-related issues and to ensure sufficient land capacity to meet the RHNA objectives.

Although the City has identified several sites that are candidates for meeting its unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to take place on all of the sites. The Housing Element contains a rezoning program to accommodate Laguna Woods' unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. If project-specific environmental evaluation is required, any potentially significant impacts identified with the proposed development project would be addressed through mitigation measures imposed as part of the environmental review process. Therefore, the proposed project would have no impacts related to conflicts with land use plans, policies, or regulations.

As described above, the 2021–2029 Housing Element was prepared to meet the City's established RHNA target; however, it should be noted that the final RHNA targets for the 6th Housing Element Cycle (from 2021–2029) were not incorporated into the Connect SoCal Plan. In addition, as described above, the City has included a rezoning program in its 2021–2029 Housing Element, the implementation of which would require the amendment of the City's Zoning Ordinance and other elements in its General Plan to allow for housing development on some of the opportunity sites. Due to these circumstances, a separate environmental study will be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Therefore, an evaluation of the proposed 2021–2029 Housing Element's consistency with applicable goals and policies included in the Connect SoCal Plan is neither warranted nor appropriate. No changes to the Draft IS/ND have been made in response to this comment.

Response to Comment L-4-5

This comment provides additional background information regarding the recent adoption of Connect SoCal and states that goals included in Connect SoCal may be pertinent to the proposed 2021–2029 Housing Element and are meant to provide guidance for its consideration. The comment letter then provides 10 goals from the Connect SoCal Plan that the commenter notes may be relevant to the 2021–2029 Housing Element.

This comment has been noted. As stated in Response to Comment L-1-4, the inclusion of Connect SoCal Plan's goals is neither warranted nor appropriate. Therefore, no changes to the Draft IS/ND have been made in response to this comment.

Response to Comment L-4-6

The comment states that a wide range of land use and transportation strategies are included in Chapter 3 of Connect SoCal to support the implementation of the regional SCS. These strategies are

provided as guidance for lead agencies, including local jurisdictions, when a project is under consideration.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

Response to Comment L-4-7

This comment recommends that the City review the Connect SoCal plan and consider its adopted goals and policies as part of the proposed project.

The goals and policies included in Connect SoCal have been reviewed and considered, as suggested. However, as described above in the Response to Comment L-1-5, no changes have been made to the Draft IS/ND.

Response to Comment L-4-8

The commenter describes the methodology used in the formation and development of growth forecasts in the Connect SoCal plan and includes a table with population, household, and employment growth forecasts for the SCAG region and for Laguna Woods.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

Response to Comment L-4-9

This comment expresses concern that the IS/ND does not refer to Regional Growth Forecasts and recommends that the City reviews the population, housing, and employment trends and forecasts based on the most recently adopted SCAG 2020 Connect SoCal Regional Growth Forecasts to recognize the City's planned growth.

As described in Section 4.14, Population and Housing, of the IS/ND, the proposed project would not, in and of itself, result in impacts related to population and housing, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program would accommodate planned regional housing growth included in the SCAG RHNA and may require subsequent project-specific environmental evaluation to determine whether it could result in potentially significant impacts. In the case where an additional environmental evaluation is required, any potentially significant impacts identified with the proposed development project would be addressed through compliance with applicable adopted development guidelines/standards and mitigation measures specific to any potentially significant impacts, imposed as part of the environmental review process. Therefore, the proposed project would not induce substantial unplanned population growth. The inclusion of the population, housing, and employment trends and forecasts included in the recently adopted Connect SoCal Regional Growth Forecasts would not affect the analysis or conclusions of

the Draft IS/ND. Therefore, these growth forecasts were not included. No changes to the Draft IS/ND have been made in response to this comment.

Response to Comment L-4-10

The commenter cites the 6th Cycle RHNA Allocation Plan for the City of Laguna Woods and calls the City's attention to HELPR 2.0, a tool intended to help jurisdictions and stakeholder understand local land use, site opportunities, and environmental sensitivities for aligning housing with the California Department of Housing and Community Development's (HCD) 6th Cycle housing element requirements.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. The City acknowledges this new tool and appreciates SCAG's efforts to provide assistance and support to local jurisdictions within its region to meet HCD housing element requirements.

Response to Comment L-4-11

This comment states that Table 4.14.A on page 4-38 of the IS/ND references the correct Final RHNA Allocation numbers.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

Response to Comment L-4-12

The commenter recommends that the City review the Environmental Justice Technical Report and the updated Environmental Justice Toolbox, which are resources to assist local jurisdictions in developing environmental justice-related goals and policies regarding solutions for environmental justice-related community issues.

As the commenter notes, Laguna Woods does not have any disadvantaged communities; however, the City appreciates the references to the various tools that can be used to develop environmental justice-related goals and policies.

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2.3 INTERESTED PARTIES

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GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

August 24, 2021

Project Name: City of Laguna woods 2021-2029 General Plan Housing
Element Update

Dear Rebecca M. Pennington,

Thank you for your letter dated August 17, 2021 regarding the project above. This is to concur that we are in agreement with the General Plan Housing Element Update. However, our Tribal government would like to request consultation for any and all future projects within this location.

I-1-1

Sincerely,

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
1(844)390-0787

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians.org

admin@gabrielenoindians.org

Gabrieleno Band of Mission Indians – Kizh Nation**Letter Code:** I-1**Commenter:** Gabrieleno Band of Mission Indians – Kizh Nation**Date:** August 24, 2021**Response to Comment I-3-1**

The commenter thanks the City of Laguna Woods (City) for sending it the IS/ND regarding the Housing Element Update, and expresses that it agrees with the plan. The commenter also requests that it remain notified and given an opportunity to comment on all future projects within Laguna Woods.

The City acknowledges the comment provided by the Gabrieleno Band of Mission Indians – Kizh Nation and looks forward to working collaboratively on any future projects.

Chris Macon

From: Sam Dunlap <tongvatcr@gmail.com>
Sent: Sunday, September 12, 2021 4:48 PM
To: Chris Macon
Subject: AB52 Consultation - General Plan Housing Element Update

Dear Mr. Macon

Thank you for the letter regarding the General Plan Housing Element Update. The Gabrielino Tongva Tribe would like to engage in an AB52 Consultation for the proposed project. Feel free to contact me at your earliest convenience for a meeting and time.

Sincerely,
Sam Dunlap
Cultural Resource Director
Gabrilleno Tongva Tribe
(909)262-9351

I-2-1



Gabrielino Tongva Tribe

Letter Code: I-2

Commenter: Gabrielino Tongva Tribe

Date: September 12, 2021

Response to Comment I-2-1

The commenter thanks the City of Laguna Woods (City) for sending them information regarding the Housing Element Update. The commenter also states that they would like to engage in Assembly Bill 52 consultation for the project.

The City acknowledges the comment provided by the Gabrielino Tongva Tribe and looks forward to working collaboratively on any future projects.

Chris Macon

From: Joyce Perry <kaamalam@gmail.com>
Sent: Thursday, September 16, 2021 2:27 PM
To: Chris Macon
Cc: Rebecca Pennington
Subject: Re: Project Notification and Invitation to Consult under Assembly Bill 52 for the City of Laguna Woods 2021-2029 General Plan Housing Element Update in Laguna Woods, Orange County, California

Thank you for your response,

At this time we have no concerns.

Húu'uni 'óomaqati yáamaqati.
Teach peace
Joyce Stanfield Perry
Payomkawichum Kaamalam - President
Juaneño Band of Mission Indians, Acjachemen Nation
Tribal Manager, Cultural Resource Director

I-3-1

On Thu, Sep 16, 2021 at 2:19 PM Chris Macon <CMacon@cityoflagunawoods.org> wrote:

Ms. Perry,

Thank you for your interest in the Laguna Woods General Plan Housing Element Update project. As stated in the Initial Study/Negative Declaration (IS/ND), the proposed project is a planning action and would not, in and of itself, result in impacts to tribal cultural resources, as it does not directly result in any physical disturbance to lands within the City. The proposed project includes the adoption of the 2021–2029 General Plan Housing Element, which is intended to address a number of housing-related issues and to ensure sufficient land capacity to meet the Regional Housing Needs Assessment (RHNA) objectives. After the State certifies the Housing Element, a separate environmental study would be required to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Potential impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known.

If you would like to discuss the project further, we are happy to meet with you. Rebecca Pennington, our Development Programs Analyst, is copied to this email and is available to help schedule a meeting. Please feel free to reach out to her with possible dates and times.

Thank you again for your interest.

Best regards,

Christopher Macon

City Manager

City of Laguna Woods

(949) 639-0525

From: Joyce Perry <kaamalam@gmail.com>

Sent: Thursday, September 16, 2021 1:06 PM

To: Chris Macon <CMacon@cityoflagunawoods.org>

Subject: Re: Project Notification and Invitation to Consult under Assembly Bill 52 for the City of Laguna Woods 2021-2029 General Plan Housing Element Update in Laguna Woods, Orange County, California

Good Afternoon,

I am writing on behalf of the Juaneno Band of Mission Indians, Achjachemen Nation- Belardes in response to your letter pursuant to AB52 regarding the City of Laguna Woods 2021-2029 General Plan Housing Element Update. I apologize for the delay in response. We wish to consult on this matter. Can you please tell me whether the General Plan Housing element will address turbal cultural resources or mitigation measures for future ground disturbance? Thank you.

Húu'uni 'óomaqati yáamaqati.

Teach peace

Joyce Stanfield Perry

Payomkawichum Kaamalam - President

Juaneño Band of Mission Indians, Acjachemen Nation

Tribal Manager, Cultural Resource Director

ITEM 7.1 - Exhibit B to Attachment A

On Wed, Aug 11, 2021 at 3:55 PM Chris Macon <CMacon@cityoflagunawoods.org> wrote:

(This letter is also being mailed to the address listed below.)

August 11, 2021

Juaneno Band of Mission Indians Acjachemen Nation - Belardes

Matias Belardes, Chairperson

32161 Avenida Los Amigos

San Juan Capistrano, CA 92675

ALSO VIA EMAIL kaamalam@gmail.com

Subject: Project Notification and Invitation to Consult under Assembly Bill 52 for the City of Laguna Woods 2021-2029 General Plan Housing Element Update in Laguna Woods, Orange County, California

Dear Chairperson Belardes:

Please consider this letter as formal notification of a proposed project as required under the California Environmental Quality Act, specifically Public Resources Code (PRC) Section 21080.3.1 and Chapter 532 Statutes of 2014 (i.e., Assembly Bill [AB] 52). Pursuant to PRC Section 21080.3.1(d), you normally have 30 days from receipt of this letter to respond in writing if you would like to consult on this project. However, per AB 1561, you have an additional 30 days to request consultation under AB 52 for the proposed project. As such, please respond in writing within 60 days of receipt of this letter if you would like to consult on the project. If you do not wish to consult for the proposed project, a written response indicating your declination to consult would be appreciated. Please provide a designated lead contact person if you have not provided that information to us already.

The proposed project (City of Laguna Woods [City] 2021-2029 General Plan Housing Element Update) includes the adoption of the 2021-2029 General Plan Housing Element. Pursuant to State law, the City has prepared an update to its General Plan Housing Element covering the 6th Cycle Planning Period from October 2021–October 2029. The draft 2021-2029 General Plan Housing Element contains an analysis and update of housing and population data based on current conditions and sources of information. The revisions incorporate current population and housing projections based on the Regional Housing Needs Assessment (RHNA) adopted by the Southern California Association of Governments in March 2021 for the 6th Cycle Planning Period. In accordance with State Housing law, the draft 2021-2029 General Plan Housing Element contains information and data including, but not limited to, the following: an assessment of housing needs in the city of Laguna Woods; an assessment of actual and potential constraints to the provision and maintenance of affordable housing; an analysis of the City's accomplishments during the 2014–2021 General Plan Housing Element cycle; an evaluation of potential residential development based on the current General Plan and Zoning Ordinance; and, the formulation of goals, policies, and programs the City will implement to address a number of housing-related issues and to ensure sufficient land capacity to meet the RHNA objectives. The proposed project does not involve ground disturbance.

A search of the Sacred Lands Files conducted by the Native American Heritage Commission (NAHC) was positive for the presence of tribal cultural resources within the project site (City limits).

If you have any questions or concerns about the project, or if you would like to consult on the project, please contact me via email at cmacon@cityoflagunawoods.org or by telephone at (949) 639-0525. You may also mail correspondence to City of Laguna Woods, Attn: Christopher Macon, 24264 El Toro Road, Laguna Woods, CA 92637.

Attachment: Figure 1 – Project Location

Sincerely,



Christopher Macon

City Manager

City of Laguna Woods

24264 El Toro Road, Laguna Woods, CA 92637

(949) 639-0525 | cmacon@cityoflagunawoods.org

www.cityoflagunawoods.org

Juaneño Band of Mission Indians – Acjachemen Nation**Letter Code:** I-3**Commenter:** Juaneño Band of Mission Indians – Acjachemen Nation**Date:** September 16, 2021**Response to Comment I-3-1**

The commenter thanks the City of Laguna Woods (City) for sending them information regarding the Housing Element Update and whether it will address tribal cultural resources or mitigation measures for future ground disturbance. The commenter also states that they currently have no concerns.

The City acknowledges the comment provided by the Juaneño Band of Mission Indians – Acjachemen Nation and looks forward to working collaboratively on any future projects.

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APPENDIX A

DRAFT INITIAL STUDY/NEGATIVE DECLARATION



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CITY OF LAGUNA WOODS **2021-2029 GENERAL PLAN** **HOUSING ELEMENT UPDATE** *Draft Initial Study/Negative Declaration*



City of Laguna Woods

August 2021

Prepared by:

LSA

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DRAFT

**INITIAL STUDY/
NEGATIVE DECLARATION**

**2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE
CITY OF LAGUNA WOODS**



August 2021

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DRAFT

**INITIAL STUDY/
NEGATIVE DECLARATION**

**2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE
CITY OF LAGUNA WOODS**

Submitted to:

City of Laguna Woods
24264 El Toro Road
Laguna Woods, California 92637

Prepared by:

LSA
20 Executive Park, Suite 200
Irvine, California 92614
(949) 553-0666
Project No. LWD2101



August 2021

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LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADU	accessory dwelling unit
APN(s)	Assessor's Parcel Number(s)
BMPs	Best Management Practices
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen Code	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board's
CBC	California Building Code
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
City	City of Laguna Woods
DOC	California Department of Conservation
ETWD	El Toro Water District
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
FIRM	Flood Insurance Rate Map
FRAP	Fire and Resources Assessment Program
GHG	greenhouse gas
HCD	California Department of Housing and Community Development
I-5	Interstate 5
IS/ND	Initial Study/Negative Declaration
Leisure World	(now known as) Laguna Woods Village
LRA	Local Responsibility Area
MRZ	Mineral Resource Zone
NAHC	Native American Heritage Commission
NCCP/HCP	Natural Community Conservation Plan/Habitat Conservation Plan

NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NPDES	National Pollutant Discharge Elimination System
OCFA	Orange County Fire Authority
OCSD	Orange County Sanitation District
OCTA	Orange County Transportation Authority
PRC	Public Resources Code
proposed project	City of Laguna Woods 2021–2029 General Plan Housing Element Update
RHNA	Regional Housing Needs Assessment
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SFHA	Special Flood Hazard Area
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SOCWA	South Orange County Wastewater Authority
SR-73	State Route 73
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
USPS	United States Postal Service
VHFHSZ	very high fire hazard severity zones
VMT	vehicle miles traveled

1.0 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*, this Initial Study/Negative Declaration (IS/ND) has been prepared for the proposed City of Laguna Woods 2021–2029 General Plan Housing Element Update (proposed project) in Laguna Woods, Orange County, California. Consistent with *State CEQA Guidelines* Section 15071 and in accordance with the City of Laguna Woods' (City) Local CEQA Procedures, this IS/ND includes a description of the proposed project, an evaluation of the potential environmental impacts, and findings from the environmental analysis.

This IS/ND evaluates the potential environmental impacts that may result from implementation of the proposed project. The City is the Lead Agency under CEQA and is responsible for adoption of the IS/ND and approval of the project.

1.1 CONTACT PERSON

Any questions or comments regarding the preparation of this IS/ND, its assumptions, or its conclusions should be directed as follows:

Address Comments to:

Rebecca M. Pennington, Development Programs Analyst
City of Laguna Woods
24264 El Toro Road
Laguna Woods, CA 92637

OR

cityhall@cityoflagunawoods.org
(reference "Housing Element Update")

Questions May be Directed to:

Rebecca M. Pennington, Development Programs Analyst
Telephone: (949) 639-0561

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2.0 PROJECT DESCRIPTION

This section describes the proposed project that is evaluated in this IS/ND. A description of the proposed project's location, objectives, and required approvals is provided below.

2.1 PROJECT OVERVIEW

The proposed project includes the adoption of the 2021–2029 General Plan Housing Element. Pursuant to State law, the City has prepared an update to its General Plan Housing Element covering the 6th Cycle Planning Period from October 2021–October 2029. The draft 2021–2029 General Plan Housing Element contains an analysis and update of housing and population data based on current conditions and sources of information. The revisions incorporate current population and housing projections based on the Regional Housing Needs Assessment (RHNA) adopted by the Southern California Association of Governments (SCAG) in March 2021 for the 6th Cycle Planning Period. In accordance with State Housing law, the draft 2021–2029 General Plan Housing Element contains information and data including, but not limited to, the following: an assessment of housing needs in the city of Laguna Woods; an assessment of actual and potential constraints to the provision and maintenance of affordable housing; an analysis of the City's accomplishments during the 2014–2021 General Plan Housing Element cycle; an evaluation of potential residential development based on the current General Plan and Zoning Ordinance; and the formulation of goals, policies, and programs the City will implement to address a number of housing-related issues and to ensure sufficient land capacity to meet the RHNA objectives.

2.2 PROJECT LOCATION AND EXISTING ENVIRONMENTAL SETTING

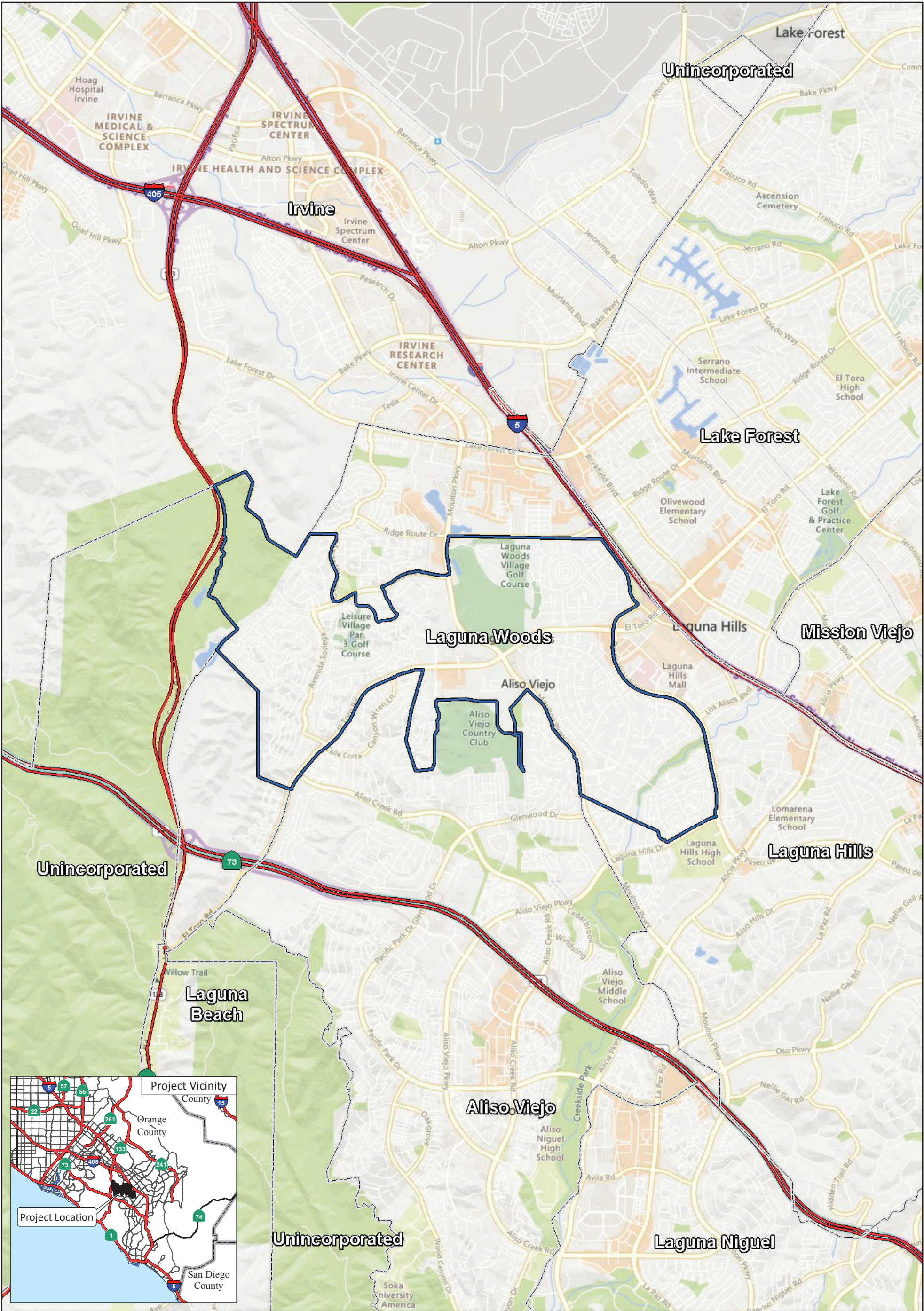
2.2.1 Regional Location

The city of Laguna Woods is located in southern Orange County within Southern California. As shown in Figure 2.1, Regional Location, the city of Laguna Woods is bordered on the north, east, and southeast by the city of Laguna Hills, on the northwest by the city of Irvine, on the west by unincorporated Orange County and the city of Laguna Beach, and on the south by the city of Aliso Viejo. According to the United States Census Bureau, the city of Laguna Woods has a total area of 3.3 square miles. Regional access is provided via Interstate 5 (I-5) and State Route 73 (SR-73).

2.2.2 Existing Project Area Conditions

Laguna Woods began as a retirement community with the development of Leisure World (now known as Laguna Woods Village) in the 1960s. Due to this, Laguna Woods is unique in that nearly all of its existing residential uses are predominantly age-restricted for adults aged 55 years and older. Of the 13,386 dwelling units in Laguna Woods, 12,736 are located in the gated community of Laguna Woods Village, which occupies approximately 80 percent of Laguna Woods' total land area. Four other residential communities (Las Palmas, The Regency, San Sebastian, and Whispering Fountains) provide an additional 650 dwelling units.

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The majority of commercial and institutional uses in Laguna Woods are situated along El Toro Road and Moulton Parkway within four-tenths of a mile of this intersection. Two smaller retail nodes are located at the El Toro Road and Paseo de Valencia intersection and at the Moulton Parkway and Ridge Route Drive intersection. The City is now almost completely built out and contains very limited undeveloped land.

2.3 PROJECT DESCRIPTION

The proposed project evaluated in this IS/ND includes the adoption of the 2021–2029 General Plan Housing Element. The project is described in greater detail below.

2.3.1 Project Background

State law requires a Housing Element as a mandatory component of a jurisdiction's General Plan and requires that the Housing Element be revised every 8 years. Periodic updates of the Housing Element ensure that local policies and programs are responsive to changing conditions and future housing needs. State Housing Element law requires the City to analyze resources available and to quantify projected housing needs by income category. The City must demonstrate that there is available land with the appropriate densities to allow the development of affordable housing to occur, and that it has programs in place or it will develop programs that will modify any regulatory measures serving as a constraint to the development of affordable housing.

2.3.2 2021–2029 General Plan Housing Element

The proposed project includes the adoption of the 2021–2029 General Plan Housing Element. Pursuant to State law, the City has prepared an update to its General Plan Housing Element covering the 6th Cycle Planning Period from October 2021–October 2029. The draft 2021–2029 General Plan Housing Element contains an analysis and update of housing and population data based on current conditions and sources of information. The revisions incorporate current population and housing projections based on the RHNA adopted by SCAG in March 2021 for the 6th Cycle Planning Period. In accordance with State Housing law, the draft 2021–2029 General Plan Housing Element contains information and data including, but not limited to, the following: an assessment of housing needs in the city of Laguna Woods; an assessment of actual and potential constraints to the provision and maintenance of affordable housing; an analysis of the City's accomplishments during the 2014–2021 General Plan Housing Element cycle; an evaluation of potential residential development based on the current General Plan and Zoning Ordinance; and, the formulation of goals, policies, and programs the City will implement to address a number of housing-related issues and to ensure sufficient land capacity to meet the RHNA objectives.

2.3.3 Compatibility with Zoning and Plans

The proposed project does not propose or approve any specific development projects and, as such, does not involve ground disturbance. The proposed project acknowledges and addresses recent State legislation regarding requirements for local density bonus programs, surplus lands, accessory dwelling unit (ADU) streamlining, and removing local barriers to housing. It is not possible to predict which properties in Laguna Woods, if any, may propose and qualify for density bonus programs. The proposed project includes a policy that requires that a rezoning program be undertaken during the

early portion of the 6th Cycle Planning Period to ensure internal consistency between the various elements of the City's General Plan and its Zoning Ordinance.

2.3.4 Potential Housing Sites

All new development under the proposed project is planned for areas that are already designated for residential, commercial, or community facilities development. This IS/ND analyzes the potential environmental impacts that would be expected to result from the adoption of the proposed project.

The City has identified several sites that are candidates for future housing development. Amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the potential housing sites. Because the City's General Plan is required to be "internally consistent," meaning any and all conflicts between General Plan elements must be acknowledged and resolved, the General Plan Housing Element is required to contain a program to zone and/or rezone sites or amend the General Plan to accommodate this housing need.

Due to the various complexities that are often involved with processing a General Plan amendment and rezoning, State law provides local jurisdictions with a grace period for rezoning/amending their General Plans. Customarily, any rezoning or General Plan amendments required to ensure internal consistency should occur no later than 3 years and 120 days from the beginning of the planning period.

On July 21, 2021, the Laguna Woods City Council authorized the City Manager to submit drafts of the updated General Plan Housing Element and Housing Element Sites Inventory Form to the California Department of Housing and Community Development (HCD) for review, as required by California Government Code Section 65585. The scenario for meeting the City's RHNA housing needs allocation that was included in that submittal is described in detail below.

The environmental analysis in this IS/ND is limited to the proposed General Plan Housing Element Update. After the State certifies the General Plan Housing Element, a separate environmental study will be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including the corresponding changes in land uses and development intensities.

The City has identified 17 potential sites within Laguna Woods that appear to be viable for near-term residential development that would help the City meet its RHNA requirements. Table 2.A 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 parcel size, and the existing zoning and General Plan land use designations on each site. The citywide locations of these 17 sites are provided in Figure 2.2, Housing Sites Key Map.

Table 2.A: Site Descriptions

Site	Description/APN	Existing Uses	Parcel Size (acres)	Current General Plan Land Use Designation	Current Zoning
1	Town Centre Vacant Lot (APN 616-012-29)	Undeveloped	1.8	Commercial	Community Commercial
2	Pacific Hills Calvary Chapel Parking Lot (APN 621-131-38)	Surface parking lot for the adjacent Pacific Hills Calvary Chapel in neighboring Aliso Viejo	0.696	Commercial	Professional & Administrative Office
3	Rossmoor Electric (APN 621-131-21)	Commercial use with a small number of office and storage uses	1.232	Commercial	Community Commercial
4	Saddleback Golf Cars (APN 621-131-26)	Commercial use with neighborhood electric vehicle and golf cart sales and repair	1.235	Commercial	Community Commercial
5	Laguna Woods Self Storage (APN 616-012-19)	Commercial use with approximately eight single-story structures used for individual storage	5.249	Commercial	Community Commercial
6	Animal Hospital (APN 616-012-03)	Commercial use with an animal hospital	0.76	Commercial	Community Commercial
7	PS Business Park (excludes Jack in the Box) (APN 616-021-30)	Commercial use with a self-storage facility and small shopping center	2.867	Commercial	Community Commercial
8	Smart Parke (APN 621-211-09)	Commercial use with a pet boarding facility	2.373	Commercial	Community Commercial
9	McCormick & Son Mortuary (APN 621-091-016)	Commercial use with a mortuary facility	1.411	Commercial	Community Commercial
10	Lutheran Church of the Cross (APN 616-041-01)	Church	3.028	Community Facilities	Community Facilities—Private
11	Geneva Presbyterian Church (APNs 616-191-05 & 616-191-06)	Church	3.955	Community Facilities	Community Facilities—Private
12	Saint Nicholas Catholic Church (APN 621-121-11)	Church	4.596	Community Facilities	Community Facilities—Private
13	Temple Judea (APN 621-121-18)	Temple	1.757	Community Facilities	Community Facilities—Private
14	Laguna Country United Methodist Church (APN 621-121-23)	Church	3.899	Community Facilities	Community Facilities—Private
15	Medical Building at Town Centre (APN 616-012-24)	Commercial use with office uses	2.69	Commercial	Professional & Administrative Office
16	Willow Tree Center East (APN 621-121-30)	Commercial use with retail, a restaurant, and an adult day services facility	3.095	Commercial	Community Commercial
17	Helm Medical Center (APN 621-091-15)	Commercial use with office uses	0.65	Commercial	Professional & Administrative Office

APN = Assessor's Parcel Number
County = County of Orange

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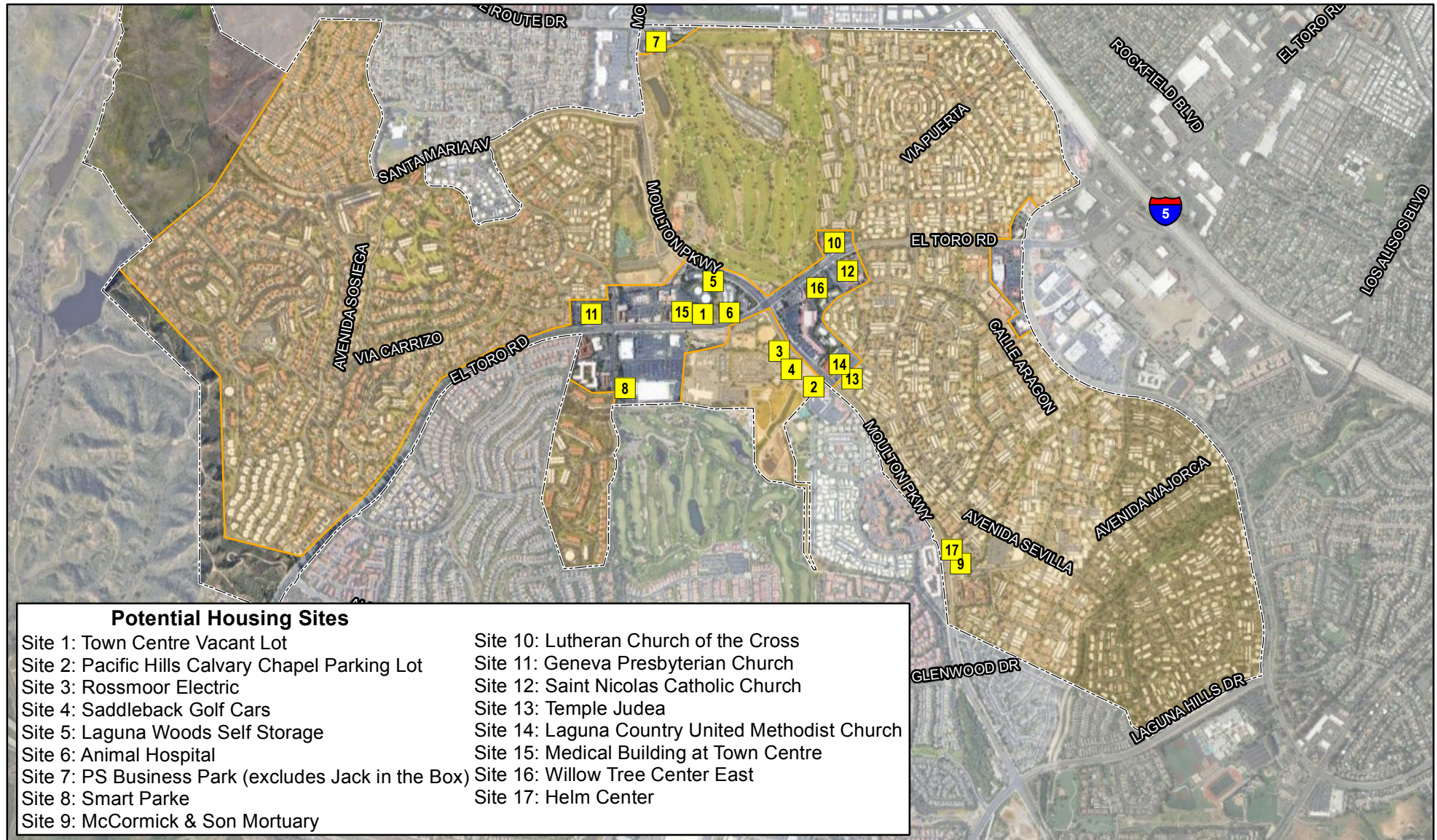


FIGURE 2.2

LSA

LEGEND

- Potential Housing Sites (with Site ID#)
- City of Laguna Woods
- Laguna Woods Village



0 1000 2000
FEET

SOURCE: Google Maps (2020)

I:\LWD2101\GIS\MXD\Key_Map.mxd (8/3/2021)

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As described above, the City proposes to include a rezoning program in its General Plan 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 many of the sites while also allowing the existing uses to continue operating. City staff has identified five potential overlay zones, which are described in further detail in Table 2.B below. Table 2.B also describes the potential overlay zone that has been assigned to each of the 17 potential housing sites under the scenario that was authorized to be submitted to HCD for review on July 21, 2021.

Table 2.B: Potential Overlay Zones

Overlay Zone	Density Range	Potential Housing Sites
Residential High Density	30–50 du/ac	1–8
Residential Medium Density	20–30 du/ac	9, 14, 17
Residential Low Density	15–20 du/ac	10–13
Mixed-Use High Density	30–50 du/ac	15
Mixed-Use Low Density	15–20 du/ac	16

du/ac = dwelling unit per acre

2.4 DISCRETIONARY ACTIONS

Discretionary approvals required for the proposed project are outlined in Table 2.C, below, and described in the following text.

Table 2.C: Discretionary Approvals

Discretionary Action	Agency Responsible
Adoption of the General Plan Housing Element	Laguna Woods City Council
Adoption of this IS/ND	Laguna Woods City Council

IS/ND = Initial Study/Negative Declaration

2.4.1 Adoption of the General Plan Housing Element

Adoption of the General Plan Housing Element would be conducted pursuant to the City's Municipal Code. As part of this review, the City would consider whether the proposed project is in compliance with State law (Section 65580–65589.8 of the California Government Code) requirements.

2.4.2 Adoption of the Final Initial Study/Negative Declaration

The Laguna Woods City Council would confirm that the Final IS/ND addresses the potential environmental effects of the proposed project, and adopt the IS/ND to satisfy CEQA requirements.

2.4.3 Other Public Agencies Whose Approval is Required

There are no other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement) for the proposed project. HCD reviews and determines whether the proposed General Plan Housing Element complies with State law; however, HCD approval is not required for the City's adoption of the General Plan Housing Element or adoption of the IS/ND.

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3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in Chapter 4.0.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

3.1 DETERMINATION

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

Digitally signed by Christopher Macon
Date: 2021.08.16 10:09:27 -07'00'

Date

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4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously

prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.1.1 Impact Analysis

a. *Would the project have a substantial effect on a scenic vista?*

No Impact. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a program to zone and/or rezone sites or amend the General Plan (rezoning program) to accommodate this housing need; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. The goals and policies in the Housing Element Update would not result in any impact to scenic vistas or resources, would not degrade the visual character of Laguna Woods, and would not cause light or glare impacts beyond what has already been contemplated in the General Plan and Zoning Code. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The location and nature of development would continue to be guided by the City's General Plan and Zoning Ordinance. Future housing projects would continue to be reviewed through the City's entitlement process and in compliance with CEQA to ensure that existing views and aesthetic conditions are preserved, and that the projects are consistent with all General Plan goals, objectives, and policies. Therefore, the proposed project would have no impacts on aesthetic resources, including substantial adverse effects on scenic vistas. No mitigation is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. As described above, the proposed project does not propose any direct changes to land uses, nor does it call out or approve any specific development projects. The proposed project would not result in any impact to scenic resources beyond what has already been contemplated in the General Plan and Zoning Code. As described above, the proposed project would not, in and of itself, result in impacts to scenic resources as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City’s unmet housing needs; however, it does not specifically amend the City’s Zoning Ordinance or other elements in the General Plan.

After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential aesthetic-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not substantially damage scenic resources. No mitigation is required.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. According to the United States Census Bureau, Laguna Woods is located within the Mission Viejo—Lake Forest—San Clemente, CA Urbanized Area.¹ As described in the *State CEQA Guidelines* Section 15387 and defined by the United States Census Bureau, an “urbanized area” is a central city or a group of contiguous cities with a population of 50,000 or more people, together with adjacent densely populated areas having a population density of at least 1,000 people per square mile.² Therefore, Laguna Woods is considered an urbanized area.

As discussed above, the proposed project does not propose any direct changes to land uses, nor does it call out or approve any specific development projects. The proposed project would not, in and of itself, result in impacts to existing visual character or quality of public views as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the

¹ United States Census Bureau. 2010a. Mission Viejo—Lake Forest—San Clemente, CA Urbanized Area No. 57709. Website: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua57709_mission_viejo--lake_forest--san_clemente_ca/DC10UA57709_001.pdf (accessed August 2, 2021).

² United States Census Bureau. 2010b. Census Urban Area FAQs. Website: <https://www.census.gov/programs-surveys/geography/about/faq/2010-urban-area-faq.html> (accessed August 2, 2021).

implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential aesthetic-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards protecting and enhancing the City's visual character and public views. All future projects would be required to conform to all applicable development standards and design guidelines in the City's Municipal Code, General Plan, and any applicable Specific Plans, that regulate scenic quality. Therefore, the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. No mitigation is required.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. As described above, the proposed project does not propose any direct changes to land uses nor does it call out or approve any specific development projects. The proposed project would not, in and of itself, create sources of substantial light or glare that adversely affect views as it does not entitle, propose, or otherwise require the construction of new development or the rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential aesthetic-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to all applicable requirements related to light and glare, including applicable regulations of the 2019 State Building Energy Efficiency Standards (Title 24) and all applicable lighting standards in the City's Zoning Ordinance. Therefore, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. No mitigation is required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.2.1 Impact Analysis

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

No Impact. The proposed project would not, in and of itself, result in impacts to agricultural resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities.

There is no land within Laguna Woods zoned for agricultural uses or land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared as part of the Farmland Mapping and Monitoring Program by the California Department of Conservation. As of 2018, all land within the City was designated as "Urban and Built Up Land."¹ The proposed project would not convert farmland to a non-agricultural use. Therefore, no impacts to agricultural resources would occur, and no mitigation is required.

¹ California Department of Conservation (DOC). 2018. Orange County Important Farmland 2018 (accessed August 2, 2021).

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The proposed project would not, in and of itself, result in impacts to agricultural resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. There is no land within Laguna Woods zoned for agricultural uses. The proposed project would not affect Williamson Act contract lands because there is no land under a Williamson Act Contract within Laguna Woods.¹ The proposed project would not convert farmland to a non-agricultural use. Therefore, no impacts to agricultural use or a Williamson Act contract would occur, and no mitigation is required.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The proposed project would not, in and of itself, result in impacts to timber land or forest land, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Additionally, there is no land zoned as forest land or timberland within Laguna Woods, and forest land and timberland do not exist within the City. The proposed project would not convert forest land to non-forest use. Therefore, no impacts to forest land or timberland would occur, and no mitigation is required.

d. Would the project result in the loss of forest land or conversion of forestland to non-forest use?

No Impact. As stated in the response under Threshold 4.2(c) above, the proposed project would not contribute to environmental changes that could result in conversion of forest land to a non-forest use. Therefore, no impacts to forest land would occur, and no mitigation is required.

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Laguna Woods does not contain land used for agricultural production and does not contain any forest land. In addition, the City has not designated any land within Laguna Woods for any type of agricultural production. The proposed project would not, in and of itself, result in changes in the existing environment that could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Therefore, no impacts to farmland or forest land would occur, and no mitigation is required.

¹ California DOC. 2017. Division of Land Resource Protection. State of California Williamson Act Contract Land Website: <https://www.conservation.ca.gov/dlrp/wa> (accessed August 2, 2021).

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.3.1 Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

No Impact. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting its unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The location and nature of development would continue to be guided by the City's General Plan and Zoning Ordinance. The proposed project would not conflict with or obstruct the implementation of the air quality plans prepared by the South Coast Air Quality Management District (SCAQMD) to attain State and national air quality standards, or violate any air quality standard. Future housing projects would continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with local, State, and federal air quality standards and consistency with the goals, policies, and standards established within the other elements of the General Plan that are intended to protect air quality. As such, the proposed project would result in no impacts related to a conflict or obstruction of implementation of applicable air quality plans. No mitigation is required.

- b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

No Impact. As described above, the proposed project would not, in and of itself, result in impacts to air quality as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential air quality-related impacts are location- and project-specific and often cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would result in no impacts related to a cumulatively considerable net increase of any criteria pollutant. No mitigation is required.

- c. Would the project expose sensitive receptors to substantial pollutant concentrations?*

No Impact. The proposed project would not, in and of itself, expose sensitive receptors to substantial pollutant concentrations, as it does not propose any development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential air quality-related impacts are location- and project-specific and often cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Short-term air quality impacts resulting from construction of the sites, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers would be subject to localized significance thresholds determined by the SCAQMD for South Orange County. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. No mitigation is required.

- d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

No Impact. As described above, the proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The proposed project would not, in and of itself, produce pollutants or odors as it does not propose any development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any potential impacts would be potentially significant. Potential odor-related impacts are location- and project-specific and often cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards including SCAQMD Rule 402 to prevent occurrences of public nuisances. SCAQMD Rule 402 regarding nuisances states: “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the

public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.” Any impacts identified with future development allowable under the rezoning program would be addressed through compliance with SCAQMD Rule 402. Therefore, the proposed project would not result in other emissions or objectionable odors adversely affecting a substantial number of people. No mitigation is required.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.4.1 Impact Analysis

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The City's General Plan Conservation Element addresses the long-range conservation, preservation, and enhancement of Laguna Woods' open space and natural environment. The proposed project would not, in and of itself, result in impacts to biological habitats as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development.

Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After

the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential biological impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. As described above, the proposed project would not, in and of itself, result in impacts to riparian habitats or other sensitive natural communities as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential biological impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No mitigation is required.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. As described above, the proposed project would not result in any adverse impacts to biological resources. The proposed project would not, in and of itself, result in impacts to State or federally protected wetlands as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts to State or federally protected wetlands would be potentially significant. Potential biological impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not have a substantial adverse effect on State or federally protected wetlands. No mitigation is required.

- d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

No Impact. As described above, the proposed project would not result in any adverse impacts to biological resources. The proposed project would not, in and of itself, result in impacts to the movement of any native resident or migratory fish or wildlife species as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential biological impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or impede the use of native wildlife nursery sites. No mitigation is required.

- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact. The proposed project has been prepared to be consistent with the City's adopted local policies and ordinances protecting biological resources. Future development projects allowed under the rezoning program would be required to be consistent with local policies and ordinances. The City has Tree Maintenance and Removal Standards per Chapter 4.25 in its Municipal Code. Future development consistent with the Housing Element would be required to comply with the City's tree maintenance and removal standards. Therefore, the proposed project would have no impact related to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No mitigation is required.

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The City is not currently participating in a Habitat Conservation Plan, Natural Community Conservation Plan, or other habitat conservation plan. The Orange County Transportation Authority's (OCTA) 2016 Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) includes a Plan Area that covers the entirety of Orange County, including Laguna Woods. The City is not a party to the OCTA NCCP/HCP, and development activity within the City is not subject to the provisions of the OCTA NCCP/HCP. Therefore, the proposed project would have no impact related to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No mitigation is required.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any humans remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.5.1 Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. The proposed project would not, in and of itself, result in impacts to historical resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential impacts to historical resources are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the *State CEQA Guidelines*. No mitigation is required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

No Impact. As described above, the proposed project would not result in any adverse impacts to cultural resources. The proposed project would not, in and of itself, result in impacts to archaeological resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether those projects would result in any potentially significant impacts. Potential impacts to archaeological resources are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development

guidelines/standards. Therefore, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource. No mitigation is required.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

No Impact. The proposed project would not, in and of itself, result in the disturbance of any human remains as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether the implementation of those projects could result in any potentially significant impacts. Potential cultural impacts are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Additionally, all future development would be required to comply with California Health and Safety Code Section 7050.5 in the event human remains are encountered. Therefore, the proposed project would not disturb any human remains, including those interred outside of dedicated cemeteries. No mitigation is required.

4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.6.1 Impact Analysis

- a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?; or*

No Impact. The proposed project would not, in and of itself, result in impacts to energy resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not actually amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential energy impacts are project-specific and cannot be assessed in a meaningful way until the specific details of a project are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards, including California Building Code (CBC) requirements. New buildings must achieve compliance with 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards Code (CALGreen Code) requirements. Therefore, the proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. No mitigation is required.

- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

No Impact. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it would result in any impacts that could be potentially significant. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Future housing development facilitated by the proposed project would be required to obtain permits and comply with federal, State, and local regulations aimed at reducing energy consumption. Applicable provisions of federal and State energy regulations, such as the California Energy Code Building

Energy Efficiency Standards (California Code of Regulations [CCR] Title 24, Part 6), the CALGreen Code (CCR Title 24, Part 11), and SB 743 transportation-related impact analysis requirements would also be imposed through future development permit review to minimize future energy consumption. Therefore, future development facilitated by the proposed project would be required to be consistent with applicable federal, State, and local laws, policies, and regulations related to renewable energy and energy efficiency. The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No mitigation is required.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.7.1 Impact Analysis

- a. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
 - ii. *Strong seismic ground shaking?*
 - iii. *Seismic-related ground failure, including liquefaction?*
 - iv. *Landslides?*

No Impact. The proposed project would not, in and of itself, result in impacts to geology and soils, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental

impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Any future housing development would continue to be required to adhere to the CBC and other standards and regulations for building designs. Impacts resulting from ground shaking, ground failure, landslides, and liquefaction hazards would be required to comply with existing codes and adherence with the recommendations of a project-specific geotechnical report, including engineered site preparation and adequate structural design. Any proposed construction would be required to implement appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. No mitigation is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

No Impact. The proposed project would not, in and of itself, result in substantial soil erosion or the loss of topsoil, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Future housing development would be subject to permits and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts concerning soil erosion or loss of topsoil. Short-term construction-related erosion would be addressed through compliance with the National Pollution Discharge Elimination System (NPDES) program, which requires implementation of a Storm Water Pollution Prevention Plan (SWPPP) for certain projects and Best Management Practices (BMPs) intended to reduce soil erosion. The proposed project would not result in substantial soil erosion or the loss of topsoil as no development or ground disturbance is proposed. No mitigation is required.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

No Impact. Adoption of the proposed project would not have an impact on any soil resources as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Future housing development would be subject to permits and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts caused by unstable geological units or soils and would require adherence with the recommendations of a project-specific geotechnical report, including engineered site preparation and adequate structural design. Any proposed construction would be required to implement appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, the proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project. No mitigation is required.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. Adoption of the proposed project would not have an impact related to expansive soils, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Any future housing development that is facilitated by the proposed project would be subject to permits and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts caused by expansive soils and would require adherence with the recommendations of a project-specific geotechnical report, including engineered site preparation and adequate structural design. Any proposed construction would be required to implement appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, the proposed project would not create direct or indirect substantial risks to life or property as a result of expansive soils. No mitigation is required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. Adoption of the proposed project would not have an impact related to the use of septic tanks or alternative wastewater disposal systems, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. As described above, future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. However, any future housing development that is facilitated by the proposed project would be in areas served by a sanitary sewer system and would therefore not use septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur, and no mitigation is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. Adoption of the proposed project would not have an impact on any unique paleontological resources or unique geologic features, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not actually amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential impacts to paleontological resources are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. Future housing development facilitated by the proposed project would be subject to permits

and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts to paleontological resources. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. No mitigation is required.

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.8.1 Impact Analysis

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?; or*

No Impact. The proposed project would not, in and of itself, result in the emission of greenhouse gases (GHG) as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not actually amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it would result in any potentially significant impacts. While future projects would emit GHGs, existing regulations and standards that would apply to any future residential development would significantly reduce GHG emissions associated with future projects. Potential GHG-related impacts cannot be assessed in a meaningful way until specific details regarding the type and location of a project are known. At such time that a future housing development proposal is considered, it would be subject to adopted development guidelines/standards. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. No mitigation is required.

- b. *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

No Impact. The proposed project would not, in and of itself, result in the emission of GHGs as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require project-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts. The City has not adopted a GHG reduction plan. In addition, the City has not completed the GHG inventory, benchmarking, and goal-setting process required to identify a reduction target and to take advantage of the streamlining provisions contained in the *State CEQA Guidelines* amendments adopted for SB 97. Since no other local or regional climate

action plan is in place, future projects may be assessed for their consistency with the California Air Resources Board's (CARB) adopted Scoping Plan.¹ This would be achieved with an assessment of a project's compliance with the elements of the Scoping Plan. In addition, future projects would be required to comply with CCR Title 24 regarding energy conservation and green-building standards. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. No mitigation is required.

¹ California Air Resources Board (CARB). 2017. November. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf (accessed August 2, 2021).

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.9.1 Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

No Impact. Adoption of the proposed project would not have an impact from the routine transport, use, or disposal of hazardous materials, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program would be required to comply with applicable State and federal regulations for the proper transport, use, storage, and disposal of hazardous materials and hazardous waste and may require project-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts. Potential hazard-related impacts are location- and project-specific and cannot be assessed in a meaningful way until the specific details of

a project and its location are known. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No mitigation is required.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

No Impact. Adoption of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. All future development allowed under the rezoning program would be required to comply with applicable State and federal regulations for proper handling of hazardous materials and may require project-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts. Potential hazard-related impacts are location- and project-specific and cannot be assessed in a meaningful way until specific details of a project and its location are known. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No mitigation is required.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. As described above, adoption of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Any future housing development allowed under the rezoning program would need to adhere to mandatory requirements and regulations related to the emissions or handling of hazardous materials, substances, or wastes near schools to reduce the potential for impacts to schools. As a result, future housing development facilitated by the proposed project would not conflict with any State or local plan aimed at preventing emissions or handling of hazardous materials near schools. All future development allowed under the rezoning program may require project-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts. Potential hazard-related impacts are location- and project-specific and cannot be assessed in a meaningful way until specific details of a project and its location are known. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No mitigation is required.

- d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact. As described above, adoption of the proposed project would not result in impacts related to hazardous materials sites, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. All future development would require site-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts related to hazardous materials sites. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would result in no impacts related to hazardous materials sites. No mitigation is required.

- e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. Adoption of the proposed project would not result in impacts related to safety hazards in the vicinity of airports, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. There are no public or private airports located within the City's limits. The closest airport to Laguna Woods is the John Wayne Airport, which is located approximately 9.5 miles northwest of the City's boundaries. Therefore, Laguna Woods is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, implementation of the proposed project would not result in a safety hazard for people residing or working in the project area. No mitigation is required.

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

No Impact. Adoption of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. All future development allowed under the rezoning program may require site-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts related to adopted emergency response plans and emergency evacuation plans. All future housing development would be required to meet the fire department and emergency personnel access requirements and therefore would not interfere with emergency response and evacuation plans. Therefore, implementation of the proposed project would not interfere with an adopted emergency response plan and/or emergency evacuation plan. No impact would occur, and no mitigation is required.

- g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

No Impact. Adoption of the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, as it does not

entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future housing development allowed under the rezoning program would be located in an urban area and would not expose people or structures to a substantial risk of wildfires. Therefore, there would be no risk of loss, injury, or death involving wildland fires. No impact would occur, and no mitigation is required.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.10.1 Impact Analysis*a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

No Impact. Adoption of the proposed project would not have an impact on hydrology or water resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any potential impacts are less than significant. Potential water-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. If a project proposes to disturb more than 1 acre of soil, the State requires that a SWPPP, which includes BMPs,

be prepared. BMP examples generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, and gravel bags, etc. Therefore, there would be no impacts. No mitigation is required.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. Adoption of the proposed project would not have an impact on groundwater supplies or groundwater recharge, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require project-specific environmental evaluation in order to determine whether it could result in any potentially significant impacts. Future housing development facilitated by the proposed project would be required to incorporate features that would reduce impervious area, as feasible, and promote water infiltration. Treatment control and hydromodification management facilities would promote retention and infiltration of stormwater. Redevelopment of already developed sites requires compliance with water quality standards intended to reduce runoff, increase infiltration, and improve water quality. Increased water use would not substantially affect groundwater supplies because the El Toro Water District's (ETWD) water supply portfolio does not include groundwater.¹ Future housing development would be required to adhere to all federal, State, and local requirements for avoiding and minimizing construction and operations impacts to groundwater supplies. Considering these requirements, future housing development facilitated by the proposed project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable management of the local basin. Therefore, there would be no impact, and no mitigation is required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Or

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Or

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Or

iv. Impede or redirect flood flows?

¹ El Toro Water District (ETWD). 2021. 2020 Urban Water Management Plan. Website: <http://etwd.com/wp-content/uploads/2021/07/ETWD-2020-UWMP-FINAL-2021.06.22.pdf> (accessed July 26, 2021).

No Impact. Adoption of the proposed project would not have an impact on existing drainage patterns of a site or area or create or contribute runoff water, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it would result in any potentially significant impacts. Future development may be subject to site-specific environmental studies as determined by the City and would comply with applicable policies related to hydrology and water quality issues, including the requirements of the Federal Water Pollution Control Act as enforced by the State Water Resources Control Board, which requires compliance with the NPDES permit for construction runoff and long-term urban runoff. Future housing development would be required to adhere to all federal, State, and local requirements for avoiding construction and operations impacts that could substantially alter the existing drainage pattern or alter the course of a stream or river. Considering these requirements, future housing development facilitated by the proposed project would not substantially alter the existing drainage pattern of the site or area. This includes no alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff. Therefore, no impacts would occur, and no mitigation is required.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

No Impact. Laguna Woods is not located within an inundation zone of a seiche. Laguna Woods is located approximately 5 miles northeast of the Pacific Ocean and is not located within a tsunami inundation zone, according to the Orange County Tsunami Inundation Maps.¹ According to the City's General Plan Safety Element, portions of Laguna Woods are subject to inundation from flooding. The Federal Emergency Management Agency (FEMA) produces Flood Insurance Rate Maps (FIRM) that show the areas in the City that are subject to flooding and the risk associated with flood hazards. FIRMs are used to administer FEMA's National Flood Insurance Program (NFIP). NFIP-designated Special Flood Hazard Areas (SFHAs) comprise approximately 26 acres of the City with an additional 2,115 acres designated as either minimal or moderate risk (Zone X). Adoption of the proposed project would not result in impacts related to inundation due to flood hazard, tsunami, or seiche zones, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential flood-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, there would be no impact related to the risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. No mitigation is required.

¹ California DOC. 2019. Orange County Tsunami Inundation Maps. Website: https://www.conservation.ca.gov/cgs/tsunami/maps/orange_ (accessed July 26, 2021).

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. Adoption of the proposed project would not have an impact on a water quality control plan or sustainable groundwater management plan, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require project-specific environmental evaluation in order to determine whether it could result in any potentially significant impacts. Future housing development facilitated by the proposed project would be required to incorporate features that would reduce impervious area, as feasible, and promote water infiltration. Treatment control and hydromodification management facilities would promote retention and infiltration of stormwater. Redevelopment of already developed sites requires compliance with water quality standards intended to reduce runoff, increase infiltration, and improve water quality. Increased water use would not substantially affect groundwater supplies because the ETWD's water supply portfolio does not include groundwater.¹ Future housing development would be required to adhere to all federal, State, and local requirements to avoid the obstruction of implementation of a water quality control plan or sustainable groundwater management plan. Considering these requirements, future housing development facilitated by the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, there would be no impact, and no mitigation is required.

¹ ETWD. 2021. 2020 Urban Water Management Plan. Website: <http://etwd.com/wp-content/uploads/2021/07/ETWD-2020-UWMP-FINAL-2021.06.22.pdf> (accessed July 26, 2021).

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.11.1 Impact Analysis*a. Would the project physically divide an established community?*

No Impact. Although the City has identified several sites that are candidates for meeting its unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The location and nature of development would continue to be guided by the City's General Plan and Zoning Ordinance. The proposed project would not, in and of itself, result in the physical division of an established community, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential land use-related impacts are location- and project-specific and cannot be assessed in a meaningful way until specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, there would be no impact related to the physical division of an established community. No mitigation is required.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. Although the City has identified several sites that are candidates for meeting its unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning

program, including any corresponding changes in land uses and development intensities. The location and nature of development would continue to be guided by the City's General Plan and Zoning Ordinance. With implementation of the rezoning program, the proposed project would be consistent with the City's Zoning Ordinance and other elements in its General Plan. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential land use-related impacts are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would have no impacts related to conflicts with land use plans, policies, or regulations. No mitigation is required.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.12.1 Impact Analysis

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. The Surface Mining and Reclamation Act (SMARA) enacted by the California Legislature in 1975 provides guidelines to assist with classification and designation of mineral lands. These areas were designated under the basis of several geologic factors but not in regard to existing land uses and ownership. These Mineral Resource Zones (MRZs) are divided into the following four categories:

- **MRZ-1:** An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- **MRZ-3:** An area containing mineral deposits of which their significance cannot be properly evaluated.
- **MRZ-4:** An area where information is not adequate enough to be able to assign to any other MRZ zone.

From these four categories, areas classified as MRZ-2 are considered to be of the greatest importance. Under an MRZ-2 classification, areas have been found to possess a high likelihood for the presence of a significant amount of mineral deposits. Additionally, MRZ-2 areas are designated by the State of California Mining and Geology Board as being “regionally significant.”

The entirety of Laguna Woods is shown to not contain any MRZ-2 zones or be within proximity to these areas.¹ There are no known mineral resources in Laguna Woods and future extraction of mineral resources is very unlikely due to the urbanized nature of the area. As indicated in the City’s

¹ California DOC. 1981. Division of Mines and Geology. Mineral Land Classification Map. *San Juan Capistrano and Laguna Beach* Quadrangles. Special Report 143.

General Plan Conservation Element, no mineral resources have been identified within Laguna Woods.

The proposed project would not, in and of itself, result in impacts to mineral resources as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. All future development allowed under the rezoning program may require subsequent project-specific environmental evaluation in order to determine whether it could result in any potentially significant impacts. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, no impacts related to the loss of availability of a known mineral resource would occur, and no mitigation is required.

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As stated in above, Laguna Woods is clearly shown to not be a part of a mineral resource zone containing any known valuable mineral resources, which would suggest a high unlikelihood of minerals being extracted in Laguna Woods. Additionally, the proposed project would not, in and of itself, result in impacts to mineral resources as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential mineral-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, no impact would occur, and no mitigation is required.

4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.13.1 Impact Analysis

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

No Impact. Adoption of the proposed project would not result in exposure of persons to noise in excess of established standards, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential noise-related impacts are project- and location-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, there would be no impacts related to the generation of a substantial temporary or permanent increase in ambient noise levels. No mitigation is required.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

No Impact. As described above, adoption of the proposed project would not result in the generation of excessive vibration or groundborne noise, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental

evaluation to determine whether it could result in any potentially significant impacts. Potential vibration-related impacts are project- and location-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future housing development proposal is considered, it would be subject to adopted development guidelines/standards. Therefore, the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels. No mitigation is required.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The closest airport to Laguna Woods is the John Wayne Airport, which is located approximately 9.5 miles northwest of the City's boundaries. Laguna Woods is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, aircraft noise would not expose people residing or working on the project site to excessive noise levels due to the proximity of a public airport. Adoption of the proposed project would not result in the exposure of people residing or working in the project area to excessive noise levels, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential noise-related impacts are location-specific and cannot be assessed until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels. No mitigation is required.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.14.1 Impact Analysis

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

No Impact. The proposed project includes revision of the General Plan Housing Element as required by State law. The City's housing needs allocation 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 4.14.A, below.

Table 4.14.A: City of Laguna Woods Housing Needs Allocation (2021–2029)

Income Level	Number of Units	Percent of Total Housing Needs Allocation
Very Low (<50% of AMI)	127	12.7%
Low (50–80% of AMI)	136	13.6%
Moderate (80–120% of AMI)	192	19.3%
Above Moderate (>120% of AMI)	542	54.4%
Total	997	100%

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

AMI = Area Median Income

HCD = California Department of Housing and Community Development

RHNA = Regional Housing Needs Assessment

SCAG = Southern California Association of Governments

As part of the proposed project, the City has identified several sites that are candidates for meeting the City's unmet housing needs. Amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation

of the rezoning program, including any corresponding changes in land uses and development intensities.

The proposed project would not, in and of itself, result in impacts related to population and housing, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program would accommodate planned regional housing growth included in the SCAG RHNA. Therefore, the proposed project would not induce substantial unplanned population growth. No mitigation is required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project would not, in and of itself, result in impacts from the displacement of people or housing, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Potential impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. Therefore, no impacts related to the displacement of substantial numbers of existing people or housing would occur. No mitigation is required.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.15.1 Impact Analysis

a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- i. *Fire protection?*
- ii. *Police protection?*
- iii. *Schools?*
- iv. *Parks?*
- v. *Other public facilities?*

No Impact. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The proposed project would not, in and of itself, result in environmental impacts associated with the construction of new or additional facilities needed as a result of reduced public service performance objectives as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development.

Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential recreation-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future housing development proposal is considered, that project would be subject to adopted development guidelines/standards. Section 11.06 of the City's Municipal Code establishes a standard of 2.5 acres of land per 1,000 residents for park and recreational purposes. Therefore, the proposed project would not result in impacts to recreational facilities. No mitigation is required.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.16.1 Impact Analysis

a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

OR

b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The proposed project would not, in and of itself, result in impacts to parks or recreational facilities as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element Update, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities.

Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential recreation-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a specific development proposal is considered, that project would be subject to adopted development guidelines/standards. Section 11.06 of the City's Municipal Code establishes a standard of 2.5 acres of land per 1,000 residents for park and recreational purposes. Therefore, the proposed project would not result in impacts to recreational facilities. No mitigation is required.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.17.1 Impact Analysis

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

OR

b. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

No Impact. The proposed project is consistent with regulations to promote pedestrian and bicycle pathways, transit, and other actions to decrease Vehicle Miles Traveled (VMT) within Laguna Woods. New development would be subject to policies described in the Circulation Element of the General Plan, as well as other policies that promote reduction of VMT. Therefore, the proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project would not, in and of itself, result in transportation impacts, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development.

Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Therefore, the proposed project would have no impacts related to *State CEQA Guidelines* Section 15064.3, subdivision (b). No mitigation is required.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

OR

d. Would the project result in inadequate emergency access?

No Impact. As described above, the proposed project would not, in and of itself, result in geometric design hazards or inadequate emergency access, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Street designs for future roads would be required to conform to the typical street widths and design elements. The roadway design standards for the City are based on engineering standards and on evolving policies and practices regarding the City's transportation infrastructure. All street improvements within the City would be subject to the approval of the City Engineer; furthermore, these improvements would be subject to the standards of the latest adopted edition of the California Department of Transportation's (Caltrans) *Highway Design Manual*, where applicable. Long-term congestion relief resulting from implementation of the Circulation Element of the General Plan would improve emergency access throughout the City for police, fire, and emergency protection services. Therefore, no dangerous design components or inadequate emergency access would occur. Therefore, the proposed project would not result in impacts related to inadequate emergency access. No mitigation is required.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.18.1 Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
- i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or*
 - ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

No Impact. AB 52 and CEQA Public Resources Code (PRC) Section 21080.3.1, subdivisions (b), (d), require a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. The Native American Heritage Commission (NAHC) was contacted on July 15, 2021, to conduct a Sacred Lands File (SLF) search and provide a Native American Contact List for the project site pursuant to AB 52 and CEQA PRC Section 21080.3.1, subdivisions (b), (d). The NAHC responded on August 5, 2021, stating that an SLF search was completed for the project site with positive results. The NAHC

recommended that 23 Native American individuals representing the Diegueño, Gabrielino, Gabrieleno, Juaneño, Luiseño, Cupeño Luiseño, Cahuilla, and Cahuilla Luiseño groups be contacted for information regarding cultural resources that could be affected by the proposed project. These 23 individuals were contacted through letters sent via United States Postal Service (USPS) Certified Mail on August 11, 2021. As of the date of this IS/ND, no Native American tribes have requested consultation; however, the consultation process is considered open and ongoing. Any information received through tribal consultation will inform the assessment as to whether the tribes believe any tribal cultural resources are present within the project area and whether any measures are needed to reduce impacts.

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan, or to designate open space that includes Native American Cultural Places. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the NAHC. The NAHC was contacted on July 15, 2021, to conduct an SLF search and provide a Native American Contact List for the project site pursuant to SB 18. The NAHC responded on August 5, 2021, stating that an SLF search was completed for the project site with positive results. The NAHC recommended that 23 Native American individuals representing the Diegueño, Gabrielino, Gabrieleno, Juaneño, Luiseño, Cupeño Luiseño, Cahuilla, and Cahuilla Luiseño groups be contacted for information regarding cultural resources that could be affected by the proposed project. These 23 individuals were contacted through letters sent via USPS Certified Mail on August 11, 2021. As of the date of this IS/ND, no Native American tribes have requested consultation; however, the consultation process is considered open and ongoing. Any information received through tribal consultation will inform the assessment as to whether the tribes believe any tribal cultural resources are present within the project area and whether any measures are needed to reduce impacts.

The proposed project would not, in and of itself, result in impacts to tribal cultural resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Potential impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. Therefore, the proposed project would have no impacts on tribal cultural resources. No mitigation is required.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.19.1 Impact Analysis

- a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

No Impact. The proposed project would not, in and of itself, result in impacts related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Potential utilities and services-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would have no impact to utilities and service systems. No mitigation is required.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Laguna Woods is served by the ETWD. Like many water districts in south Orange County, the ETWD is nearly 100 percent dependent on imported water to meet the water needs of its customers. The imported supply typically consists of a blend of water from the Colorado River and the Sacramento Bay Delta via the State Water Project.¹ The ETWD Recycling Plant services its wastewater that comes from portions of Laguna Hills, Mission Viejo, Aliso Viejo, Lake Forest, and Laguna Woods. The water is treated through a water recycling plant and is completely separate from the drinking water. The treated water is only used for irrigation purposes. Therefore, adequate water supply is available to accommodate the RHNA during the 2021–2029 Housing Element planning period. The proposed project would result in no impacts related to water supplies. No mitigation is required.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Therefore, the proposed project would not result in impacts related to the provision of wastewater treatment services. No mitigation is required.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed

¹ ETWD. About Us. Water Recycling Plant. Website: <https://etwd.com/water-recycling-plant/> (accessed August 2, 2021)

under the rezoning program may require subsequent project-specific environmental evaluation. Future housing development allowed under the rezoning program would be required to adhere to all federal, State, and local requirements for solid waste reduction and recycling. Considering these requirements, the proposed project would not result in any impacts related to the generation of solid waste in excess of State or local standards, or in excess of local infrastructure's capacity. Therefore the proposed project would have no impact on planned solid waste capacity, and no mitigation is required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Solid waste disposal practices in California are governed by multiple federal, State, and local agencies that enforce legislation and regulations ensuring that landfill operations minimize impacts to public health and safety and the environment. The California Integrated Waste Management Act (AB 939) changed the focus of solid waste management from landfill to diversion strategies (e.g., source reduction, recycling, and composting). The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. AB 939 established mandatory diversion goals of 25 percent by 1995, 50 percent by 2000, and 75 percent by 2020. The City provides curbside recycling for both residential and commercial uses, as well as curbside residential green waste, which both count toward the City's solid waste diversion rate. CalRecycle tracks and monitors solid waste disposal on a per capita basis. Future projects allowed under the rezoning program would be required to comply with the City's Construction and Demolition Ordinance (City Ordinance No. 12-05). As stipulated by City Ordinance No. 12-05 and the CALGreen Code, the future projects would be required to divert a minimum of 65 percent of construction and demolition debris in order to obtain building permits. Future projects would be required to comply with existing and future statutes and regulations, including waste diversion programs mandated by City, State, and federal law. Therefore, the proposed project would not result in an impact related to federal, State, and local statutes and regulations related to solid wastes, and no mitigation is required.

4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.20.1 Impact Analysis

- a. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b. *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- c. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

No Impact. The proposed project would not, in and of itself, result in impacts related to wildfires, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the

implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it would result in any potentially significant impacts.

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the State through its Fire and Resources Assessment Program (FRAP). These maps place areas of California into different fire hazard severity zones (FHSZ), based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing densities, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, CAL FIRE is responsible for wildland fire protection for land areas that are generally unincorporated and they are classified as State Responsibility Areas (SRAs). In areas where local fire protection agencies (e.g., Orange County Fire Authority [OCFA]) are responsible for wildfire protection, the lands are classified as Local Responsibility Areas (LRAs). CAL FIRE currently identifies all of Laguna Woods as an LRA.

In addition to establishing local or State responsibility for wildfire protection in a specific area, CAL FIRE designates areas as very high fire hazard severity zones (VHFHSZ) or non-VHFHSZ. According to the CAL FIRE Very High Fire Hazard Severity Zone Maps for the Orange County region, the majority of Laguna Woods is designated as a non-VHFHSZ, while the southwestern corner of the City is designated VHFHSZ.¹ All future development would require project-specific environmental evaluation in order to determine that any potential impacts are less than significant. Potential wildfire-related impacts are locations specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the project would result in less than significant impacts related to wildfire. No mitigation is required.

¹ California Department of Forestry and Fire Protection (CAL FIRE). 2011. Very High Fire Hazard Severity Zones in LRA. Website: https://osfm.fire.ca.gov/media/5887/c30_lagunawoods_vhfhsz.pdf (accessed July 26, 2021).

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.21.1 Impact Analysis

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. As described throughout Section 4.4, Biological Resources, Section 4.5, Cultural Resources, Section 4.7, Geology and Soils, and Section 4.18, Tribal Cultural Resources, the analysis indicates that the proposed project does not have the potential to degrade the quality of the environment, substantially reduce fish or wildlife habitats, impact wildlife populations or ranges, or eliminate historical, archaeological, or paleontological resources. As described throughout the analysis, the Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Development projects would continue to be subject to existing requirements for project-level review. For the reasons stated above, the proposed project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or

animal, or eliminate important examples of the major periods of California history or prehistory. No mitigation is required.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

No Impact. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development that could contribute to short-term or long-term cumulative impacts that have not previously been contemplated by the General Plan and Zoning Code, which would continue to guide the location and nature of future development in Laguna Woods. Therefore, the proposed project would not have cumulatively considerable impacts. No mitigation is required.

- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

No Impact. As indicated throughout the analysis, the proposed project would have no adverse impacts on people or the environment. The proposed project would not create environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. The proposed project would facilitate future development to the City's housing stock providing increased housing development opportunities for all income levels. Therefore, the proposed project would not have environmental effects that would cause substantial adverse effects on human beings. No mitigation is required.

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5.0 REFERENCES

AESTHETICS

United States Census Bureau. 2010a. Mission Viejo—Lake Forest—San Clemente, CA Urbanized Area No. 57709. Website: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua57709_mission_viejo--lake_forest--san_clemente_ca/DC10UA57709_001.pdf (accessed August 2, 2021).

_____. 2010b. Census Urban Area FAQs. Website: <https://www.census.gov/programs-surveys/geography/about/faq/2010-urban-area-faq.html> (accessed August, 2021).

AGRICULTURE

California Department of Conservation (DOC). 2017. Division of Land Resource Protection. State of California Williamson Act Contract Land Website: Williamson Act Program (ca.gov) (accessed August 2, 2021).

_____. 2018. Orange County Important Farmland 2018 (accessed August 2, 2021).

GREENHOUSE GAS EMISSIONS

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. November. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf (accessed August 2, 2021).

HYDROLOGY AND WATER QUALITY

California Department of Conservation (DOC). 2019. Orange County Tsunami Inundation Maps. Website: https://www.conservation.ca.gov/cgs/tsunami/maps/orange_ (accessed July 26, 2021).

El Toro Water District (ETWD). 2021. *2020 Urban Water Management Plan*. Website: <http://etwd.com/wp-content/uploads/2021/07/ETWD-2020-UWMP-FINAL-2021.06.22.pdf> (accessed July 26, 2021).

MINERAL RESOURCES

California Department of Conservation (DOC). 1981. Division of Mines and Geology. Mineral Land Classification Map. *San Juan Capistrano* and *Laguna Beach* Quadrangles. Special Report 143.

POPULATION AND HOUSING

Southern California Association of Governments (SCAG). 2021. 6th Cycle Final Regional Housing Needs Assessment (RHNA) Allocation.

UTILITIES AND SERVICE SYSTEMS

California Department of Resources Recycling and Recovery (CalRecycle). Solid Waste Information System Facility Detail: Olinda Alpha Sanitary Landfill. Website: <https://www2.calrecycle.ca.gov/SWFacilities/Directory/30-AB-0035/Detail/> (accessed August 2, 2021).

El Toro Water District (ETWD). 2015. History of El Toro Water District. Website: <https://etwd.com/about-us/history-of-el-toro-water-district/> (accessed August 2, 2021).

_____. 2021. About Us. Water Recycling Plant. Website: <https://etwd.com/water-recycling-plant/> (accessed August 2, 2021)

Orange County Waste & Recycling (OCWR). Olinda Alpha Landfill. Website: <http://www.oclandfills.com/landfill/active/olindalandfill> (accessed August 2, 2021).

WILDFIRE

California Department of Forestry and Fire Protection (CAL FIRE). 2011. Very High Fire Hazard Severity Zones in Local Responsibility Area (LRA). Website: https://osfm.fire.ca.gov/media/5887/c30_lagunawoods_vhfhsz.pdf (accessed July 26, 2021).

ITEM 7.1

Attachment B

HCD Findings Letter dated September 20, 2021

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**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
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www.hcd.ca.gov



September 20, 2021

Christopher Macon, City Manager
City of Laguna Woods
24262 El Toro Road
Laguna Woods, CA 92637

Dear Christopher Macon:

RE: Review of the City of Laguna Woods' 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Laguna Woods' (City) draft housing element received for review on July 22, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a telephone conversation on September 14, 2021 with you, Planner Rebecca Pennington, and the City's consultants Ashley Davis and Ryan Bensley. In addition, HCD considered comments from The Kennedy Commission, YIMBY Law, and residents Catherine R Van Camp, Ramesh C Joshi pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021 for Southern California Association of Governments (SCAG) localities. If adopted after this date, Government Code section 65588, subdivision (e)(4), requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline. For more information on housing element adoption requirements, please visit HCD's website at: http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at:

http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and
http://opr.ca.gov/docs/Final_6.26.15.pdf.

Susan O'Strander, Director of Community Development
Page 2

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

HCD appreciates the professionalism and dedication you, Rebecca Pennington and your consultants provided during the course of our review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Marisa Prasse, of our staff, at Marisa.Prasse@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannan West". The signature is fluid and cursive, with the first name "Shannan" and the last name "West" clearly distinguishable.

Shannan West
Land Use & Planning Unit Chief

Enclosure

APPENDIX CITY OF LAGUNA WOODS

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

The element did not address this requirement. The review requirement is one of the most important features of the element update. The review of past programs should analyze the City's accomplishments over the previous planning period. This information provides the basis for developing a more effective housing program.

A thorough program-by-program review is necessary to evaluate City's performance in addressing housing goals. As part of this analysis, the element should describe the actual results of the prior element's programs, compare those results to the objectives projected or planned, and based on an evaluation of any differences between what was planned versus achieved, provide a description of how the objectives and programs of the updated element incorporate changes resulting from the evaluation. This information and analysis provide the basis for developing a more effective housing program.

In addition, as part of the evaluation of programs in the past cycle, the element must provide an explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness).

For more information, See HCD's Building Blocks at <https://www.hcd.ca.gov/community-development/building-blocks/getting-started/review-revise.shtml>.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing (AFFH) in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

General: The element has some basic information on poverty levels and access to opportunity map scores. However, the element generally does not address many components of this requirement. The element, among other things, must include outreach relevant to AFFH, a full assessment of fair housing, identification, and prioritization of contributing factors to fair housing issues and goals and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity, as detailed below. For more information, please visit <https://www.hcd.ca.gov/community-development/affh/index.shtml>.

Enforcement: The element must include the City's ability to provide enforcement and outreach capacity which can consist of actions such as the City's ability to investigate complaints, obtain remedies, or the City's ability to engage in fair housing testing. The element currently states that the City works with the Fair Housing Council of Orange County (FHCOC) to provide fair housing community education, individual counseling, mediation, and low-cost advocacy. However, the analysis must also describe compliance with existing fair housing laws and regulations, analyze any patterns in fair housing complaints (using data such as HUD's FHEO Inquiries by City found on HCD's AFFH Data Viewer), and include a conclusion of summary of issues.

Integration and Segregation: The element includes data on dissimilarity by race/ethnicity at the local level; however, it should also evaluate this data for patterns and trends, include a regional comparison, and consider other data options. In addition, this section must address trends and patterns locally and regionally within the City for disability and familial status, and regionally for income. Finally, the element should include a summary of integration and segregation fair housing issues.

Racially/Ethnically Concentrated Areas of Poverty (R/ECAP): The element states that there aren't any R/ECAP in the City. In addition, the City should analyze the racial concentrations as it relates to areas of affluence if the City does not have areas of concentrated poverty. The combination in the R/ECAP and areas of affluence analyses will help guide goals and actions to address fair housing issues. The analysis should evaluate the patterns and changes over time and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.

Access to Opportunity: The element includes some general data from the overall indicators of access to opportunity from the TCAC/HCD maps, as well as some data on local education and economic opportunity, but the element should analyze this data for differences across geographies, trends, other relevant factors and incorporate local data and knowledge. In addition, the element should analyze and compare local trends and patterns to the regional level for access to opportunities related to education, economic, transportation, and environmental quality.

Disproportionate Housing Needs, Including Displacement: The element does include some information on overcrowded households, substandard housing conditions, homelessness, and cost-burdened households, but it must also analyze the data including evaluating spatial trends, patterns, and other local knowledge, and conclude with a summary of issues. In addition, the element must include an analysis of

displacement risk and must still provide data, analysis, and conclusions. One resource for the displacement analysis is the Urban Displacement Project's Gentrification and Displacement maps: <https://www.urbandisplacement.org/los-angeles/los-angeles-gentrification-and-displacement>.

Local Data and Knowledge, and Other Relevant Factors: The element does not address this requirement. The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. The element should analyze historical land use and investment practices or other information and demographic trends such as this history of land use in Laguna Woods related to age restrictions and other conditions, covenants and restrictions that may have impeded housing choices and mobility.

Contributing Factors: The element must list and prioritize contributing factors to fair housing issues. The element is missing this requirement. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to adequate goals and actions. Examples include community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, location and type or lack of affordable housing and lack of public or private investment in areas of opportunity or affordable housing choices. The analysis shall result in strategic approaches to inform and connect goals and actions to mitigate contributing factors to affordable housing.

Site Inventory: The element discusses the proposed sites relative to patterns of diversity and income but must also address the other components of the assessment of fair housing (e.g., disability status, familial status, access to opportunity, disproportionate housing need including displacement). In addition, the analysis should address the number of anticipated units by income group and how the sites identified improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact).

Goals, Priorities, Metrics, and Milestones: Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have metrics and milestones as appropriate and should address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection. Given the history and nature of development patterns in the City, the element could focus on programs that enhance housing mobility and encourage development of more housing choices and affordable housing throughout the community.

For further guidance, please visit HCD's Affirmatively Furthering Fair Housing in California webpage at <https://www.hcd.ca.gov/community-development/affh/index.shtml>.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

Extremely Low-income Households (ELI): The element must quantify existing and projected ELI households and analyze their housing needs. The analysis should consider tenure, cost burden, overcrowding and other household characteristics then examine trends and the availability of resources to determine the magnitude of gaps in housing needs. The housing need for projected ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of very low-income households qualify as ELI households. For additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Housing Conditions: The element identifies the age of the housing stock. However, it must estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers/property managers, including non-profit housing developers or organizations. For additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/housing-stock-characteristics.shtml>.

4. *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. (Gov. Code, § 65583, subd. (a)(3).)*

Aggregated Sites – Multiple Parcels Comprising Sites: Site 11 listed in the sites inventory is comprised of multiple parcels. While the element may aggregate parcels, it must also list each parcel-by-parcel number or unique reference, parcel size, zoning, general plan designation, describe any existing uses for any nonvacant sites, and include a calculation of the realistic capacity of each parcel. For additional information and sample sites inventory, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/inventory-of-land-suitable.shtml>.

Realistic Capacity: While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls, site improvements and typical densities of existing or approved residential developments at a similar affordability level.

In additions, the element must analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow nonresidential uses (e.g., mixed-use or overlays). The estimate must account for land use controls such as allowing 100 percent nonresidential uses. To demonstrate the likelihood for residential development in nonresidential zones, the element could describe any performance standards mandating a specified portion of residential and any factors increasing the potential for residential development such as incentives for residential use, and residential development trends in the same nonresidential zoning districts. For example, the element could analyze all development activity in zones that allow 100 percent nonresidential uses, policies, and programs accordingly. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#zoning>.

Suitability of Nonvacant Sites: While the element identifies nonvacant sites to accommodate the regional housing need for lower-income households, the description provided regarding potential for redevelopment is inadequate. The element must further describe the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g).) For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, any presences of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment and the condition of the structure or could describe any expressed interest in redevelopment. For additional information and sample analysis, see the Building Blocks at: <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#analysis>.

In addition, the housing element relies upon nonvacant sites to accommodate more than 50 percent of the Regional Housing Needs Allocation (RHNA) for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Infrastructure: While the element indicates could sufficiently support housing development, it should clarify sufficient existing or planned sewer infrastructure capacity to accommodate the RHNA. (Gov. Code, § 65583.2, subd. (b).)

Electronic Sites Inventory Form: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Sites with Zoning for a Variety of Housing Types:

- *Emergency Shelters:* The element should describe the development standards of the CF-P/I and CF/P zones that allow emergency shelters by-right, the capacity of these zones to accommodate the identified housing need for emergency shelters, the applicability of any spacing requirements, typical parcel sizes, whether the sites are nonvacant, and the potential capacity for adaptive reuse. In addition, the analysis should provide an analysis of proximity to transportation and services for these sites, hazardous conditions, and any conditions inappropriate for human habitability. Lastly, the element should analyze the "adequate" private living space requirement as a potential constraint for the development of emergency shelters and how emergency shelter parking requirements comply with AB 139 (Chapter 335, Statutes of 2019) or include a program to comply with this requirement.
- *Low-Barrier Navigation Center:* Low-Barrier Navigation Centers shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65660. The element must demonstrate compliance with this requirement and include programs as appropriate.
- *Employee Housing:* The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and 17021.6. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. For additional information and sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/farmworkers.shtml>.
- *Accessory Dwelling Units (ADUs):* The element should specifically discuss the relationship of ADUs and the potential for conditions, covenants and restrictions precluding ADUs. The element should add or modify programs, if necessary, based on the outcomes of this analysis.

In addition, after a cursory review of the City's ordinance, the department discovered several areas which were not consistent with State ADU Law. This

includes, but is not limited to, not allowing ADUs in all zones that allow residential uses, allowing a homeowner's association to regulate or prohibit accessory dwelling units, excessive development standards, maximum size restrictions. HCD will provide a complete listing of ADU non-compliance issues under a separate cover. As a result, the element should add a program to update the City's ADU ordinance to comply with state law. For more information, please consult HCD's ADU Guidebook, published in December 2020, which provides detailed information on new state requirements surrounding ADU development.

5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Fees and Exaction: The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their cumulative impact as potential constraints on housing supply and affordability. The analysis may utilize hypothetical projects such as those contemplated in the sites inventory for single family and multifamily development and should address the cumulative planning and impact fees per unit relative to total development costs. For additional information and a sample analysis and tables, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/fees-and-exactions.shtml>.

Local Processing and Permit Procedures: While the element describes some local processing times, per the call between HCD and the City, the times given were based on nonresidential projects. The element should provide information on permit processing times for residential projects and must evaluate the processing and permit procedures' impacts as potential constraints on housing supply, affordability, timing, and approval certainty. For example, the analysis should consider processing and approval procedures for typical single family and multifamily developments, including type of permit, level of review, number of public hearings, approval findings and any other discretionary approval procedures.

In addition, Table D Housing Types Per Zoning Code (p. B-7) indicates that condominiums and apartments in zones permitting multifamily development require a conditional use permit (CUP). The element must analyze the CUP process as a potential constraint on housing supply and affordability. The analysis should identify findings of approval for the CUP and evaluate their impact on development approval certainty, timing, and cost. The element must demonstrate this process is not a constraint or it must include a program to address and remove or mitigate the CUP requirement.

Streamlined Ministerial Approval Permit Procedures: The element should describe the City's SB 35 (Chapter 366, Statutes of 2017) streamlined ministerial approval procedure and application and include programs if appropriate.

Zoning, Development Standards, and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards, and fees on the City's website and include programs if appropriate.

Codes and Enforcement: The element includes the City's building enforcement processes; however, it must also include any local amendments to the building code and analyze potential constraints on housing supply, cost, and affordability.

Constraints on Housing for Persons with Disabilities: The element must include a description and analysis of potential constraints on housing for persons with disabilities. Specifically:

- *Reasonable Accommodations:* The element must demonstrate the City has a reasonable accommodation procedure for providing exception in zoning and land use and should describe and evaluate the typical findings for a reasonable accommodation request.
- *Group Homes for Seven or More Persons:* The element subjects group homes for seven to twelve persons to a CUP, unlike other similar uses. The element should specifically analyze these constraints for impacts on housing supply and choices, approval certainty and objectivity for housing for persons with disabilities and include programs as appropriate.
- *Definition of Family and Group Homes with Six or Fewer Persons:* The element should provide an analysis of potential constraints associated with the City's definitions of Community Care facilities. On page B-17, the element states, "The term 'family' includes the occupants of community care facilities serving six or fewer persons that are permitted or licensed by the State." However, the state does not license all community care facilities or group homes serving six or fewer persons. The element should describe where this definition is found in municipal code, provide clarification on this definition and update in the element, and include a program to rectify this definition if found in code.

Although local ordinances and policies are enacted to protect the health and safety of citizens and further the general welfare, the element should be utilized to periodically reexamine local ordinances and policies to determine whether, under current conditions, they are accomplishing their intended purpose or constituting a barrier to the maintenance, improvement, or development of housing for all income levels. Such an examination may reveal that certain policies have a disproportionate or negative impact on the development of particular housing types (e.g., multifamily) or on housing developed for low- or moderate-income households and persons with disabilities. Ordinances, policies, or practices that have the effect of excluding housing affordable to low- and moderate-income households may also violate state and federal fair housing laws that prohibit any land-use requirements that discriminate (or have the effect of discriminating) against affordable housing.

In cases where the analyses identify existing constraints, the housing element should include program responses to mitigate the effects. A determination should be made for each potential constraint as to whether it poses as an actual constraint.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including*

the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)

Land Prices, Developed Densities and Permit Times: The element must be revised to include analysis of the price of land, requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis must address any hinderances on the construction of a locality's share of the regional housing need.

7. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

The element indicates there are no farming lands in the City and no farmworkers employed in fulltime farming occupations in Laguna Woods. However, farmworkers from the broader area and those employed seasonally may have housing needs, including within the City's boundaries. As a result, the element should at least acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., using USDA county-level farmworker data) and include programs as appropriate.

8. *Analyze the opportunities for energy conservation with respect to residential development. (Gov. Code, § 65583, subd. (a)(8).)*

The element did not address this requirement. The element must include an analysis of energy conservation opportunities in residential development. The analysis should facilitate the adoption of housing element policies and programs. For example, programs could provide incentives to promote higher density housing along transit, encourage green building techniques and materials in new construction and remodels, promote energy audits and participation in utility conservation programs, and facilitate energy conserving retrofits upon resale of homes. For additional information and sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/opportunities-for-energy-conservation.shtm> and HCD's *Green Building and Sustainability Resources* bibliography at http://www.hcd.ca.gov/hpd/green_build.pdf.

C. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and*

to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)

As noted in Finding B4, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.

If the element does not identify adequate sites to accommodate the regional housing need for lower-income households, it must include a program(s) to identify sites with appropriate zoning to accommodate the regional housing need within the planning period. (Gov. Code, § 65583.2, subd. (h) and (i).). While the element does include a rezone program (Program 1.1.1), the program must commit to:

- permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval;
- allow a minimum of 16 units per site;
- require a minimum density of 20 units per acre; and
- at least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need, if those sites:
 - allow 100 percent residential use; and
 - require residential use occupy 50 percent of the total floor area of a mixed-use project.

2. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

The element generally did not address this requirement. This is particularly important given the City has never facilitated the development of a publicly assisted housing and past zoning and land use systems may have stunted housing choices and mobility. The element must include a program(s) with specific actions and timelines to assist in the development of housing for lower and moderate-income households. These actions must specifically include extremely low-income and special needs households. The programs could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to lower and moderate-income households; assisting, supporting or pursuing funding applications; and working with housing developers coordinate and implement a strategy for developing housing affordable to lower and moderate-income households. For additional information, see the Building

Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/program-requirements/assist-in-development-housing.shtml> and for financial assistance programs, see HCD's website at http://www.hcd.ca.gov/fa/LG_program_directory.pdf.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B5 and B6, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of dwelling units demolished by public or private action. (Gov. Code, § 65583, subd. (c)(4).)*

As noted in Finding B3, the element requires a complete analysis of housing stock conditions. Depending upon the results of that analysis, the City may need to revise or add programs to conserve and improve the existing affordable housing stock. In addition:

- Program 2.2.2 (Building Permit Fee Waiver): Consider expanding the building permit fee waiver for improvements to a home, regardless of age.
 - Program 3.2.2 (Tenant Assistance): Provide specific commitments, milestones, and measurable outcomes.
 - Program 3.2.3 (Hazard Mitigation Measures): Provide greater specificity, clear commitments and milestones, and measurable outcomes, including dates and milestones earlier in the planning period.
5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs to have specific commitment, milestones and metrics and to enhance housing mobility strategies, encourage development of new affordable housing in high resource areas, improve place-based strategies, and protect residents from displacement.

6. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units*

that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, “accessory dwelling units” has the same meaning as “accessory dwelling unit” as defined in paragraph (4) of subdivision (i) of Section 65852.2. (Gov. Code, § 65583, subd. (c)(7).)

The element is required to include a program that incentivizes or promotes ADU development for very low-, low-, and moderate-income households. While the element includes Program 1.4.2 to prepare and maintain a webpage and flyer with information on ADUs in Calendar Year 2023, this is not sufficient to meet this requirement. Examples of actions include flexible zoning requirements, development standards, or processing and fee incentives that facilitate the creation of ADUs, such as reduced parking requirements, fee waivers and more. Other strategies could include targeted advertising of ADU development opportunities or establishing an ADU specialist within the planning department.

In addition, as described in Finding B4, Program 1.4.1 (ADU Ordinance) should be revised based on the description of conditions, covenants and restrictions and precluding ADUs and to update the City’s ADU ordinance to comply with State law.

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element did not address this requirement. The element must include quantified objectives estimating the number of housing units by income category, including extremely low-income that can be constructed, rehabilitated, and conserved over a five-year time period. This requirement could be addressed by utilizing a matrix like the one illustrated below:

Income	New Construction	Rehabilitation	Conservation/ Preservation
Extremely Low-			
Very Low-			
Low-			
Moderate-			
Above Moderate-			
TOTAL			

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)

While the City made effort to include the public through City Council meetings, moving forward, the City should employ additional methods for public outreach efforts, particularly including lower-income and special needs households, language accessibility at meetings, and providing alternative formats and venues for public input besides city council meetings. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income and special needs households in future public outreach efforts. In addition, the element should summarize public comments and describe how public comments were considered and incorporated into the housing element. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml>.

In addition, based on comments during our review call with City staff, HCD understands the City made the element available to the public only one week before its submittal to HCD. By not providing adequate time for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in the course of its review. The availability of the document to the public and opportunity for public comment at least two weeks prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.

F. Consistency with General Plan

The housing element shall describe the means by which consistency will be achieved with other general plan elements and community goals. (Gov. Code, § 65583, subd. (c)(7).)

The element did not address this requirement. The housing element affects a locality's policies for growth and residential land uses. The goals, policies and objectives of an updated housing element may conflict with those of the land-use, circulation, open space elements as well as zoning and redevelopment plans. The general plan is required to be "internally consistent." As part of the housing element update, the City should review the general plan to ensure internal consistency is achieved and should describe how internal consistency will be maintained throughout the planning period. In addition, The City should consider an internal consistency review as part of its annual general plan implementation report required under Government Code section 65400.

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ITEM 7.1

Attachment C

Draft City Response to HCD Findings Letter dated September 20, 2021

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CITY RESPONSE TO CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT FINDINGS LETTER DATED SEPTEMBER 20, 2021

According to the letter from the California Department of Housing and Community Development (HCD) to the City of Laguna Woods (City) dated September 20, 2021, several revisions to the Draft Housing Element are necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). Responses to the findings included in HCD's letter are provided below.

A. REVIEW AND REVISION

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

HCD's letter notes that this requirement was not addressed.

Exhibit D, Housing Element Performance Assessment, has been added.

B. HOUSING NEEDS, RESOURCES, AND CONSTRAINTS

1. Affirmatively further[ing] fair housing (AFFH) in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)

AFFH information is provided in Exhibit A, Housing Needs Assessment.

Enforcement

HCD's letter notes that the element must address the City's ability to provide enforcement and outreach capacity actions. The letter also states that the analysis must describe compliance with existing fair housing laws and regulations, analyze any patterns in fair housing complaints, and include a conclusion summary of issues.

Section 1.4.1.1 in Exhibit A, Housing Needs Assessment, has been revised.

Integration and Segregation

HCD's letter notes that the element should evaluate the compiled race/ethnicity dissimilarity data for patterns and trends, including a regional comparison. The letter also states that the element must address trends and patterns locally and regionally within Laguna Woods for disability and familial status, and regionally for income, and should include a summary of integration and segregation fair housing issues.

Figures 2 through 6 in Exhibit C, Housing Sites Inventory and Analysis, map poverty status, diversity index, healthy places index, social vulnerability index, and Tax Credit Allocation Committee (TCAC) opportunity area composite score data, as provided in the AFFH Data Viewer released by HCD in April 2021, along with the locations of the 17 potential housing sites to identify any potential patterns and

trends of disparate housing needs and disproportionate access to opportunities. Those figures and the summaries that follow in Sections 6.1, 6.2, 6.3, 6.4, and 6.5 of Exhibit C, Housing Sites Inventory and Analysis, evaluate integration and segregation patterns and trends at the local level.

A table with Census data related to disability, familial status, and income trends and patterns at a local and regional level has been added as Section 6.7 in Exhibit C.

Section 6.9 in Exhibit C, Housing Sites Inventory and Analysis, has been revised.

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

HCD's letter notes that the City has concluded that it does not include any racially or ethnically concentrated areas of poverty; however, HCD asserts that the City should analyze the racial concentrations as they relate to areas of affluence.

An analysis of racial concentrations as they relate to areas of affluence, and a table of racial/ethnic data concentrations, have been added to Section 1.4.1.2 in Exhibit A, Housing Needs Assessment.

Access to Opportunity

HCD's letter acknowledges that the element includes some general data from the overall indicators of access to opportunity from the TCAC/HCD maps, as well as some data on local education and economic opportunity, but suggests that the element analyze these data for differences across geographies, trends, and other relevant factors and incorporate local data and knowledge. In addition, the City should analyze and compare local trends and patterns to the regional level for access to opportunities related to educational and economic opportunities, transportation, and environmental quality.

As stated in Exhibit C, Housing Sites Inventory and Analysis, access to opportunity is defined by utilizing HCD's most recent guidance for implementing AFFH. Figures 2 through 6 in Exhibit C contain maps that are used to analyze and compare access to opportunity. Summary narratives are provided to supplement those figures and provide further explanation. Section 6.5 in Exhibit C details the range of resource areas that are located throughout Laguna Woods using the TCAC Opportunity Area maps and concludes that Sites 2, 3, 4, and 8 are preferable for affordable housing development due to their locations in higher resource areas.

Information pertaining to an alternate way to define access to opportunity using the UC Davis Center for Regional Change and the Rabobank Regional Opportunity Index tool has been added as Section 6.6 in Exhibit C.

Disproportionate Housing Needs, Including Displacement

HCD's letter notes that the element includes some information on overcrowded households, substandard housing conditions, homelessness, and cost-burdened households; however, it must also analyze the data including the evaluation of spatial trends, patterns, and other local knowledge, and conclude with a summary of issues. The element must include an analysis of displacement risk, including data, analysis, and conclusions.

An analysis of displacement risk and disproportionate housing needs has been added as Section 1.3.7.3 in Exhibit A, Housing Needs Assessment. As suggested in HCD's letter, data from the Urban Displacement Project's Gentrification and Displacement maps has been included.

Local Data and Knowledge, and Other Relevant Factors

HCD's letter asserts that the element does not address this requirement. HCD notes that the element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. In addition, the element must include other relevant factors that contribute to fair housing issues in Laguna Woods. The element should analyze historical land use and investment practices or other information and demographic trends such as the history of land use in Laguna Woods related to age restrictions and other conditions, covenants, and restrictions that may have impeded housing choices and mobility.

Section 6.8 has been added to Exhibit C, Housing Sites Inventory and Analysis, acknowledging that most of Laguna Woods' housing stock is subject to age restrictions, which has impeded housing choices for younger residents interested in relocating to Laguna Woods.

Contributing Factors

HCD's letter states that the element should include a discussion of contributing factors to fair housing issues.

Chapter 6.0 in Exhibit C, Housing Sites Inventory and Analysis, has been revised.

Site Inventory

HCD's letter states that the element must address disability status, familial status, access to opportunity, and disproportionate housing need, including displacement, as part of its assessment of fair housing. In addition, the analysis should address the number of anticipated units by income group and how the identified sites would improve conditions.

HCD's comments regarding disability and familial status have been addressed through the addition of Section 6.7 in Exhibit C, Housing Sites Inventory and Analysis. An analysis of displacement risk and disproportionate housing has been added as Section 1.3.7.3 in Exhibit A, Housing Needs Assessment. Additional information regarding the level of access to opportunities that exist at each of the potential housing sites has been incorporated into Section 6.5 in Exhibit C. Additional information regarding the manner in which the development of new affordable housing units on several of the potential housing sites would facilitate the integration of lower-income households in a way that would affirmatively further fair housing opportunities has been incorporated into Section 6.9 in Exhibit C.

Goals, Priorities, Metrics, and Milestones

HCD's letter states that the element must be revised to add or modify goals and actions. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing

factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have metrics and milestones as appropriate and should address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation, and revitalization and displacement protection. Given the history and nature of development patterns in the City, HCD suggests that the element could focus on programs that enhance housing mobility and encourage development of more housing choices and affordable housing throughout the community.

Programs pertaining to AFFH are described under “Priority Issue 3.”

2. Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)

Extremely Low-Income Households (ELI)

HCD’s letter states that the element must quantify existing and projected ELI households and analyze their housing needs. The analysis should consider tenure, cost burden, overcrowding, and other household characteristics and examine trends and the availability of resources to determine the magnitude of gaps in housing needs.

Please refer to Section 1.5 in Exhibit A, Housing Needs Assessment. A discussion of the various HCD-defined income categories can be found in Table F. Table G quantifies the percentage and number of existing households that fall into the ELI category. Table AB reflects the projected very low income housing needs, which includes its ELI housing needs, as established by the RHNA. Table S analyzes the estimated affordable housing prices by income and household size, considers the annual costs, and compares them to the annual income of ELI households to determine the availability of resources and identify gaps that are present in housing needs. The analysis concludes that homeownership is out of reach for residents within the ELI category, and severe overpayment or overcrowding may occur as a result of the gap between market costs and affordability for this income category.

3. Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)

Housing Conditions

HCD’s letter states that the element must estimate the number of housing units that require rehabilitation and replacement. HCD notes that the analysis could include estimates from a recent windshield survey or sampling, estimates from code enforcement staff, or information from knowledgeable builders/developers/property managers, including non-profit housing developers or organizations.

Section 1.3.4 in Exhibit A, Housing Needs Assessment, has been revised to reflect that the City’s code enforcement staff conducted a windshield survey in early October 2021 of all residential units within Laguna Woods to identify housing units with visible signs of damage or disrepair in an effort to estimate the number of housing units that are in need of rehabilitation and replacement. Table H,

which summarizes the quantified objectives regarding housing rehabilitation during the 2021–2029 planning period, has been added to Chapter 8.0 in Exhibit C, Housing Sites Inventory and Analysis.

4. 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. (Gov. Code, § 65583, subd. (a)(3).)

Aggregated Sites – Multiple Parcels Comprising Sites

HCD's letter notes that Site 11 listed in Exhibit C, Housing Sites Inventory and Analysis, is comprised of multiple parcels. While the element may aggregate parcels, HCD points out that it must also list each parcel by its parcel number or unique reference. The size, zoning, and general plan designation must be provided, as well as a calculation of the realistic housing development capacity of each parcel. For any nonvacant sites, a description of any existing uses must be provided.

Information pertaining to the characteristics of the two parcels comprising Site 11 has been added to Table B in Exhibit C, Housing Sites Inventory and Analysis.

The Housing Element Sites Inventory Form has been revised to consider each parcel separately.

Realistic Capacity

HCD's letter indicates that the element must provide support for the assumptions regarding the buildout of the various housing sites included in its inventory. HCD also states that the estimated number of units that could be built on each site must be adjusted as necessary, based on the land use controls, site improvements and typical densities of existing or approved residential developments at a similar affordability level.

Information pertaining to the realistic development capacity of each potential housing site is provided in Table G in Exhibit C, Housing Sites Inventory and Analysis. A discussion of the various assumptions that were used in estimating the realistic development capacity is provided in Chapter 7.0 in Exhibit C. Both Table G and Chapter 7.0 have been revised.

Suitability of Nonvacant Sites

HCD's letter states that the description provided regarding the potential for redevelopment on the nonvacant sites is inadequate. HCD indicates that the element must further describe the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development. Due to the element relying upon nonvacant sites to accommodate more than 50 percent of the RHNA for low-income households, findings based on substantial evidence are required to demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period.

Chapter 4.0 in Exhibit C, Housing Sites Inventory and Analysis, has been revised.

The required findings are included in the adoption resolution.

Infrastructure

HCD's letter states that the element should clarify that sufficient existing or planned sewer infrastructure capacity is available to accommodate the RHNA.

Section 5.2 in Exhibit C, Housing Sites Inventory and Analysis, addresses infrastructure constraints on the potential housing sites, including the availability of existing or planned sewer infrastructure.

Policy Objective H-4.2 and Program H-4.21 address coordination with the sewer agency.

Electronic Sites Inventory Form

HCD's letter states that the City must utilize standards, forms, and definitions adopted by HCD when preparing its sites inventory.

The City provided HCD with a copy of its Housing Element Sites Inventory Form concurrent with the submittal of the Draft General Plan Housing Element for review on July 21, 2021. The Housing Element Sites Inventory Form has been revised as a result of the revisions summarized herein.

Sites with Zoning for a Variety of Housing Types

Emergency Shelters

HCD's letter states the element should describe the development standards of the CF-P/I and CF/P zones that allow emergency shelters by-right, the capacity of these zones to accommodate the identified housing need for emergency shelters, the applicability of any spacing requirements, typical parcel sizes, whether the sites are nonvacant, and the potential capacity for adaptive reuse. In addition, the analysis should provide an analysis of proximity to transportation and services for these sites, hazardous conditions, and any conditions inappropriate for human habitability. The element should analyze the "adequate" private living space requirement as a potential constraint for the development of emergency shelters and how emergency shelter parking requirements comply with Assembly Bill 139 or include a program to comply with this requirement.

Section 2.3.9 in Exhibit B, Constraints Analysis, has been revised.

Program H-1.2.6 has been added to delete the reference to "private living space."

Low Barrier Navigation Center

HCD's letter states that low barrier navigation centers must be a by-right use in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses. The element must demonstrate compliance and include programs as appropriate.

Low barrier navigation centers are discussed in Section 2.3.9 in Exhibit B, Constraints Analysis.

Program H-1.2.6 has been added to explicitly identify that low barrier navigation centers are permitted as required by Government Code 65660.

Employee Housing

HCD's letter states that the City must demonstrate that its zoning is consistent with the Employee Housing Act.

Section 2.3.11 in Exhibit B, Constraints Analysis, has been revised.

Program H-1.2.6 has been added to explicitly identify that zoning is consistent with the Employee Housing Act.

Accessory Dwelling Units (ADUs)

HCD's letter notes that the element should specifically discuss the relationship of ADUs and the potential for conditions, covenants, and restrictions precluding ADUs. The City should add or modify programs, if necessary, based on the outcomes of this analysis. In addition, HCD suggests that the City add a program to update its ADU ordinance to comply with State law.

The City has reviewed its ADU ordinance and disagrees that updates are required to comply with state law. Nevertheless, Program H-1.4.1 has been revised to note that the City will amend the ordinance as necessary. Additional review will occur after HCD provides the "complete listing of ADU non-compliance issues" that its letter indicated would be provided under separate cover. As requested by HCD, the City emailed a copy of its current ADU ordinance to HCD on September 14, 2021.

5. An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)

Fees and Exactions

HCD's letter states that the element must describe all required fees for single-family and multifamily housing development, including impact fees, and analyze their cumulative impact as potential constraints on housing supply and affordability. The analysis should address the cumulative planning and impact fees per unit relative to total development costs.

Section 2.6 in Exhibit B, Constraints Analysis, has been revised.

Local Processing and Permit Procedures

HCD's letter states that the element should provide information on permit processing times for residential projects and must evaluate the processing and permit procedures' impacts as potential constraints on housing supply, affordability, timing, and approval certainty. In addition, HCD notes that the element must analyze the conditional use permit (CUP) process for condominiums and apartments in zones permitting multi-family development as a potential constraint on housing supply and affordability.

As described in Section 2.7.2 in Exhibit B, Constraints Analysis, the City has not processed an application for a residential development project since the San Sebastian Apartments in the mid-2000s. Nevertheless, it is committed to working closely with developers to approve residential projects in a timely manner and minimize any potential time constraints on development.

Section 2.7.1 in Exhibit B, Constraints Analysis, has been revised to clarify that the City's CUP requirement only applies to condominiums and apartments in existing residential zones and would not apply to the proposed overlay zoning districts. Therefore, the CUP requirement only affects apartment or condominium conversions. Although the CUP requirement does not affect the City's housing supply, it could affect affordability.

Streamlined Ministerial Approval Permit Procedures

HCD's letter notes that the element should describe the City's Senate Bill 35 streamlined ministerial approval procedure and application and include programs, if appropriate.

Program H-1.2.7 has been added to formalize written procedures for the application and processing of housing projects eligible for Senate Bill 35's streamlined, ministerial approval process.

Zoning, Development Standards, and Fees

HCD's letter states that the element must clarify the City's compliance with new transparency requirements for posting all zoning, development standards, and fees on its website.

Section 2.9.3 in Exhibit B, Constraints Analysis, has been added.

Program H-1.2.1 has been added to explicitly address Assembly Bill 1483 compliance.

Codes and Enforcement

HCD's letter indicates that the element must describe any local amendments to building codes and analyze potential constraints on housing supply, cost, and affordability.

Section 2.8 in Exhibit B, Constraints Analysis, has been revised.

Constraints on Housing for Persons with Disabilities

HCD's letter states that the element must include a description and analysis of potential constraints on housing for persons with disabilities.

Section 2.4 in Exhibit B, Constraints Analysis, identifies constraints on housing for persons with disabilities. The analysis concludes that there are no City-initiated constraints on housing for persons with disabilities caused or controlled by the City.

- *Reasonable Accommodations:* HCD notes that the element must demonstrate the City has a reasonable accommodation procedure for providing exception in zoning and land use and should describe and evaluate the typical findings for a reasonable accommodation request.

Section 2.4.1.4 in Exhibit B, Constraints Analysis, has been revised.

- *Group Homes for Seven or More Persons:* HCD notes that the element subjects group homes for seven to 12 persons to a CUP, unlike other similar uses. HCD further notes that the element should specifically analyze these constraints for impacts on housing supply and choices, approval certainty, and objectivity for housing for persons with disabilities and include programs as appropriate.

Program H-1.3.4 has been added to remove the conditional use permit requirement for community care facilities serving seven to 12 persons located in areas where residential uses are permitted.

- *Definition of Family and Group Homes with Six or Fewer Persons:* HCD states that the element should provide an analysis of potential constraints associated with the City's definitions of community care facilities. Specifically, HCD takes issues with the definition of the term "family" in the City's Municipal Code, which states that a family includes the occupants of community care facilities serving six or fewer persons that are permitted or licensed by the State. HCD notes that the State does not license all community care facilities or group homes serving six or fewer persons and states that the element should describe where this definition is found in the City's Municipal Code, provide clarification on this definition and update it in the element, and include a program to rectify this definition, if necessary.

Program H-1.3.4 has been added to revise the zoning definition of "family" to address inconsistencies with state law related to the occupants of community care facilities.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

Land Prices, Developed Densities, and Permit Times

HCD's letter notes that the element must be revised to include an analysis of the price of land and the requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis must address any hindrances on the construction of the City's share of the regional housing need.

The last housing development application that the City received was for the San Sebastian Apartments in 2007. Therefore, there is no recent data responsive to this request.

Sections 2.6 and 2.7 in Exhibit B, Constraints Analysis, include information on development fees and local processing and permit procedures.

7. Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)

HCD's letter acknowledges that there are no farming lands in Laguna Woods and no farmworkers employed in fulltime farming occupations; however, HCD states that the element should acknowledge the housing needs of permanent and seasonal farmworkers at a county level and include programs as appropriate.

Section 1.2.3.7 in Exhibit A, Housing Needs Assessment, has been revised. As suggested in HCD's letter, data from the United States Department of Agriculture has been included.

8. Analyze the opportunities for energy conservation with respect to residential development. (Gov. Code, § 65583, subd. (a)(8).)

HCD's letter notes that the element must include an analysis of energy conservation opportunities in residential development. The analysis should facilitate the adoption of housing element policies and programs.

Section 5.5 in Exhibit C, Housing Sites Inventory and Analysis, has been added.

Program H-1.2.8 has been added to 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, the program calls for such incentives to be adopted.

C. HOUSING PROGRAMS

1. Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)

HCD's letter notes that the element does not include a complete site analysis; therefore, the adequacy of sites and zoning was not established. Based on the results of a complete sites inventory and analysis, HCD indicates that the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. HCD's letter also states that the rezoning program must commit to the following:

- Permitting owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval;
- Allowing a minimum of 16 units per site;
- Requiring a minimum density of 20 units per acre; and
- At least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need, if those sites:
 - Allow 100 percent residential use; and
 - Require that residential use occupy 50 percent of the total floor area of a mixed-use project.

Program H-1.1.1 has been revised to incorporate the items outlined above.

Please refer to the City's response to Finding B4 for information regarding the site analysis.

2. The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)

HCD's letter states that the element generally did not address this requirement and must include a program(s) with specific actions and timelines to assist in the development of housing for lower and moderate-income households. These actions must specifically include extremely low-income and special needs households.

The following programs contain specific actions and timelines to assist in the development of housing for lower and moderate-income households, including extremely low-income and special needs households:

- Program H-1.1.1 to rezone the 17 potential housing sites identified in the Housing Sites Inventory and Analysis to accommodate the City's housing needs allocation. Anticipated Timeline: Calendar Year 2022
- Program H-1.2.2 (formerly H-1.2.1) to prepare and maintain a webpage with information related to the 17 potential housing sites identified in the Housing Sites Inventory and Analysis, including a Geographic Information System (GIS) map layer with geospatial information. Anticipated Timeline: Calendar Year 2022
- Program H-1.2.3 (formerly H-1.2.2) to 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. Anticipated Timeline: Calendar Year 2022

- Program H-1.2.4 (formerly H-1.2.3) to 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 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. Anticipated Timeline: Calendar Year 2022
- Program H-1.2.5 (formerly H-1.2.4) to adopt an ordinance waiving or reducing City building permit fees for 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. Anticipated Timeline: Calendar Year 2022
- Program H-1.2.6 (formerly H-1.2.5) to amend various, existing housing-related provisions of the Laguna Woods Municipal Code to promote regulatory clarity. Anticipated Timeline: Calendar Year 2022
- The element includes several programs (H-1.3.1, H-1.3.2, H-1.3.3, H-1.3.4, H-1.4.1, H-1.4.2, H-1.4.3, and H-1.5.1) related to transitional housing, supportive housing, accessory dwelling units, junior accessory dwelling units, and emergency shelters. Programs H-1.3.4 and H-1.4.3 have been added. Programs H-1.3.3, H-1.4.1, and H-1.5.1 have been revised.

The Draft General Plan Housing Element that was submitted for HCD review on July 21, 2021 included a program to amend the existing affordable housing density bonus ordinance for consistency with Assembly Bill 2345. That program has been removed due to the City Council adopting an ordinance with those amendments in December 2021.

3. Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)

HCD's letter states that the element requires a complete analysis of potential governmental and nongovernmental constraints.

Please refer to the City's response to Findings B5 and B6.

Program H-1.2.6 has been added to amend various, existing housing-related provisions of the Laguna Woods Municipal Code to promote regulatory clarity.

Program 1.3.4 has been added to amend various, existing housing-related provisions of the Laguna Woods Municipal Code to conform to state law.

4. Conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of dwelling units demolished by public or private action. (Gov. Code, § 65583, subd. (c)(4).)

HCD's letter states that the element must include a complete analysis of housing stock conditions. Depending upon the results of that analysis, the City may need to revise or add programs to conserve and improve the existing affordable housing stock. HCD's letter also includes notes regarding Programs 2.2.2, 3.2.2, and 3.2.3.

Please refer to the City's response to Finding B3.

Programs 2.2.2, 3.2.2, and 3.2.3 have been revised.

5. Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)

HCD's letter states that the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs to have specific commitment, milestones, and metrics and to enhance housing mobility strategies, encourage development of new affordable housing in high resource areas, improve place-based strategies, and protect residents from displacement.

Please refer to the City's response to Finding B1.

6. Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, "accessory dwelling units" has the same meaning as "accessory dwelling unit" as defined in paragraph (4) of subdivision (i) of Section 65852.2. (Gov. Code, § 65583, subd. (c)(7).)

HCD's letter notes that the element must include a program that incentivizes or promotes ADU development for very low-, low-, and moderate-income households. In addition, Program 1.4.1 should be revised to update the City's ADU ordinance to comply with state law.

Please refer to the City's response to Finding B4.

Program H-1.4.1 has been revised.

Program H-1.4.3 has been added to designate and maintain a “specialist” to assist with the processing and approval of applications to develop accessory dwelling units and junior accessory dwelling units. HCD’s letter specifically referenced “establishing an ADU specialist within the planning department” as an effective strategy.

D. QUANTIFIED OBJECTIVES

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

HCD’s letter notes that this requirement was not addressed. The element must include quantified objectives estimating the number of housing units by income category, including extremely low-income that can be constructed, rehabilitated, and conserved over a five-year time period.

Quantified objectives (using the matrix format provided in HCD’s letter) have been added as Section 8.0 in Exhibit C, Housing Sites Inventory and Analysis.

E. PUBLIC PARTICIPATION

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)

Exhibit E, Public Participation Efforts, has been revised.

Program H-4.1.1 has been added to provide an annual opportunity for public participation.

Program H-4.1.2 also includes an annual opportunity for public participation.

The City notes that a public review period for a revised draft of the General Plan Housing Element and HCD Housing Element Sites Inventory Form occurred between January 13, 2022 and January 27, 2022.

F. CONSISTENCY WITH GENERAL PLAN

The housing element shall describe the means by which consistency will be achieved with other general plan elements and community goals. (Gov. Code, § 65583, subd. (c)(7).)

HCD’s letter notes that this requirement was not addressed. The City should review its General Plan to ensure internal consistency is achieved and should describe how internal consistency will be maintained throughout the planning period. In addition, the City should consider an internal consistency review as part of its annual General Plan implementation report required under Government Code Section 65400.

Section 5.3 in Exhibit C, Housing Sites Inventory and Analysis, has been revised.

Program H-4.1.2 has been revised to include an annual General Plan internal consistency review as part of the annual reporting required by Government Code Section 65400. HCD’s letter specifically suggested linking internal consistency reviews with required annual reporting.

ITEM 7.1

Attachment D

Revisions for Draft General Plan Housing Element posted January 13, 2022

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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 ~~F~~G in Exhibit C

Note: The rezoning process will ~~also~~ 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) permitting housing projects by right as required by state law, (2) 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, (3) establishing densities for each potential housing site as specified in Table G in Exhibit C, and (4) 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. 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
 Quantified Objectives: Conforming Webpage and GIS Map Layer

Program H-1.2.2. 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



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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-1.2.3. 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-1.2.4. Adopt an ordinance waiving or reducing City building permit fees for 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-1.2.5. ~~Amend the existing affordable housing density bonus~~

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~~ordinance for consistency with Assembly Bill 2345 (2020). 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 2021-2022

Anticipated Funding: General Fund

Quantified Objectives: Conforming Ordinance

~~Note: The City is required to comply with Assembly Bill 2345 (2020) regardless of whether its existing affordable housing density bonus ordinance is amended for consistency. Amending the ordinance will promote regulatory clarity.~~

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.



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

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 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

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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.
- 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



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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.

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

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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
 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



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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

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.

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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.

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.



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

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 <u>2025-2024</u> 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 (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.

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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 ~~this~~the housing element.

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

- 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-~~14.41.12~~. Prepare and submit an annual report to the City Council, California Governor's Office of Planning and Research, and HCD describing with:

- ~~The status of the housing element and progress in its implementation, in accordance with 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



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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.

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 ~~D-E~~ – Public Participation Efforts

EXHIBIT A

HOUSING NEEDS ASSESSMENT

CITY OF LAGUNA WOODS

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HOUSING NEEDS ASSESSMENT

CITY OF LAGUNA WOODS

Submitted to:

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LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
ACS	American Community Survey
AFFH	Affirmatively Furthering Fair Housing
AMI	area median income
CalEnviroScreen	California Communities Environmental Health Screening Tool
CBC	California Building Code
CC	Community Commercial
City	City of Laguna Woods
CoC	Continuum of Care
County	County of Orange
CUP	Conditional Use Permit
DDS	California Department of Developmental Services
FHCOC	Fair Housing Council of Orange County
HCD	Housing and Community Development Department of the State of California
HUD	United States Department of Housing and Urban Development
LIHTC	Low Income Housing Tax Credit
OEHHA	Office of Environmental Health Hazard Assessment
RC	Residential Community
RHNA	Regional Housing Needs Assessment
RMF	Residential Multifamily
SCAG	Southern California Association of Governments

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1.0 HOUSING NEEDS ASSESSMENT

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. Specifically, Government Code Section 65583(a) requires an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. This section of the Housing Element examines the characteristics of Laguna Woods' population and housing stock as a means of better understanding the nature and extent of unmet housing needs. The Housing Needs Assessment is comprised of the following components: (1) Demographic Profile; (2) Household Profile; (3) Housing Stock Characteristics; (4) Affirmatively Furthering Fair Housing; and (5) Regional Housing Needs.

1.1 DEMOGRAPHIC PROFILE

Demographic changes such as population growth or changes in age can affect the type and amount of housing needed in a community. This section addresses the population, age, and race and ethnicity of Laguna Woods residents.

1.1.1 Population Growth and Trends

Table A presents population growth trends in Laguna Woods from 1990 to 2020 and compares this growth to neighboring jurisdictions and Orange County. As shown, Orange County experienced the highest level of growth during the 1990s (18 percent). Neighboring jurisdictions experienced their highest level of growth during the 2000 to 2010 period (48 percent in Irvine and almost 32 percent in Lake Forest). However, during the 2000 to 2010 period, Laguna Woods experienced a decrease in its population. As will be discussed in further detail below, Laguna Woods residents are significantly older, on average, than the rest of Orange County. This means that Laguna Woods' population growth due to natural increase (births minus deaths) is slower than other parts of Orange County.

Table A: Regional Population Growth Trends

Jurisdiction	1990	2000	2010	2020	Percent Change		
					1990–2000	2000–2010	2010–2020
Laguna Woods	N/A	17,794	16,273	16,243	N/A	-8.55%	-0.18%
Aliso Viejo	N/A	N/A	47,816	50,044	N/A	N/A	4.66%
Irvine	110,330	143,072	212,375	281,707	29.68%	48.44%	32.65%
Laguna Beach	23,170	23,727	22,723	22,343	2.40%	-4.23%	-1.67%
Laguna Hills	N/A	29,891	30,270	31,508	N/A	1.27%	4.09%
Lake Forest	N/A	58,707	77,395	84,711	N/A	31.83%	9.45%
Orange County	2,410,668	2,846,289	3,010,232	3,194,332	18.07%	5.76%	6.12%

Sources: (1) California Department of Finance, Demographic Research Unit, Report E-5;

(2) California Department of Finance, Demographic Research Unit, Report E-8 City/County/State Population and Housing Estimates;

(3) California Department of Finance, Demographic Research Unit, E-4 Revised Historical.

N/A = Not Applicable

Census data from 2000 to 2010 show that a reduction in the population growth rate for Orange County occurred during the decade. Countywide, population growth dropped to approximately 6 percent, while some local communities, such as Irvine and Lake Forest, experienced robust growth due to the development of new housing. Laguna Woods experienced a population decrease of approximately 9 percent during this period.

While most of the neighboring communities grew modestly between 2010 and 2020, the population of Laguna Woods in 2020 was estimated to be 16,243, approximately less than 1 percent lower than in 2010. The growth rate of Orange County as a whole was 6 percent, more than six times that of Laguna Woods. Of the surrounding communities shown, only Aliso Viejo had a growth rate that was close to that of Orange County. Laguna Woods saw a 0.18 percent population decrease from 2010 to 2020. However, this is much less of a decrease compared to the previous decade.

The Southern California Association of Governments (SCAG) projects that the population of Laguna Woods will grow to 16,500 by 2045. This represents a growth rate of approximately 1.6 percent over the next 25 years. It should be noted that SCAG's growth projection does not reflect potential population growth due to Laguna Woods' RHNA allocation, which is discussed in further detail in Section 1.5, Regional Housing Needs.

1.1.2 Age Characteristics

Table B shows the age distribution and median age of Laguna Woods' population in 2010 and 2018 and compares this with Orange County as a whole. Table B indicates that seniors aged 65 and older were the largest population group in Laguna Woods in 2010 (80 percent) and 2018 (83 percent). The proportion of the population within the younger age groups (under 5 years, 5 to 17 years, and 18 to 24 years) decreased since 2010, while there was an increase in the older adult population. The proportion of seniors (ages 65 and older) increased from 80 percent to 83 percent. However, Laguna Woods' median age decreased from 78 in 2010 to 75 in 2018.

Table B: Age Distribution

Age Group	2010		2018		
	Population	Percent	Population	Percent	Orange County Percent
Under 5 years	33	0.2%	0	0.0%	6.0%
5-17 years	65	0.4%	10	0.1%	17.0%
18-24 years	49	0.3%	23	0.1%	9.5%
25-44 years	179	1.1%	100	0.6%	27.4%
45-64 years	2,982	18.3%	2,666	16.5%	26.6%
65+ years	12,987	79.7%	13,429	82.8%	13.9%
Total	16,295	100.0%	16,228	100.0%	100.0%
Median Age	78		75		38

Sources: (1) 2010 ACS 5-Year Estimates (Table S0101);
(2) 2018 ACS 5-Year Estimates (Table S0101)

Overall, the age distribution for Laguna Woods is skewed toward higher percentages of senior populations compared with Orange County as a whole. As shown in Table B, the percentage of the Laguna Woods' population that is 65 years of age and older (83 percent) is substantially higher than that of Orange County (14 percent). Laguna Woods' median age (75) is also substantially higher than

Orange County's median age (38). This reflects the fact that a large percentage of Laguna Woods residents live in Laguna Woods Village, an age-restricted retirement community for residents who are 55 years of age and older that occupies a majority of Laguna Woods' area. The proportion of children (ages 17 and under) and adults aged 18 to 64 are also notably lower in Laguna Woods compared to Orange County.

1.1.3 Race and Ethnicity

Historically, White residents have been the majority racial group within Laguna Woods. Table C displays the racial and ethnic composition of Laguna Woods' population in 2010 and 2018 and compares this with the countywide distribution. While changes since 2010 have generally been slight, Laguna Woods is trending toward a more diverse population. In 2018, White residents made up 78 percent of Laguna Woods' population, representing an 11 percent decrease since 2010. The proportion of White residents in Laguna Woods is also notably higher than that of Orange County as a whole (61 percent countywide).

Table C: Racial and Ethnic Composition (2010 and 2018)

Racial/Ethnic Group	2010		2018		
	Persons	Percent	Persons	Percent	Orange County Percent
White	14,499	89.0%	12,678	78.1%	61.7%
Asian/Pacific Islander	1,357	8.3%	3,142	19.4%	20.4%
Black or African American	126	0.8%	73	0.4%	1.7%
American Indian	0	0.0%	8	0.0%	0.5%
Other Race	208	1.3%	172	1.1%	11.7%
Two or More Races	105	0.6%	155	1.0%	4.1%
Total	16,295		16,228		
Hispanic	723	4.4%	821	5.1%	34.1%
Non-Hispanic	15,572	95.6%	15,407	94.9%	65.9%
Total	16,295		16,228		

Sources: (1) 2010 ACS 5-year estimates (Tables C02003 and B03003);
(2) 2018 ACS 5-year estimates (Tables C02003 and B03002).

While only representing 19 percent of the total population in 2018, the number of Asian/Pacific Islander residents has increased by 11 percent since 2010. Laguna Woods' Asian/Pacific Islander population is now on par with Orange County (19 percent compared to 20 percent). Chinese is the predominant Asian ethnicity represented in Laguna Woods, making up approximately 9 percent of Laguna Woods' total population. There are also large populations of Korean and Filipino residents within Laguna Woods.

The Hispanic population increased by approximately 1 percent from 2010 to 2018. The estimated proportion of Hispanic residents in 2018 was 5 percent, still markedly lower than Orange County, which has an estimated 34 percent Hispanic population.

1.1.4 Employment

An evaluation of the types of jobs held by community residents provides insight into potential earning power and the segment of the housing market into which they fall. Information on how a

community's employment base is growing and changing can help identify potential housing demand changes in the future.

The State Employment Development Department estimates that 2,900 Laguna Woods residents (or approximately 18 percent of Laguna Woods' population) were in the labor force in January 2021. This reflects the fact that Laguna Woods' housing stock is predominantly age-restricted. Laguna Woods has seen a drastic increase in unemployment since March 2020 due to the onset of the COVID-19 pandemic. In January 2020, Laguna Woods' unemployment rate was at 2.2 percent; however, it rose sharply in the spring and peaked at 11.6 percent in May 2020. As of January 2021, the unemployment rate within Laguna Woods was 5.6 percent. The unemployment rate of Orange County was at 2.9 percent in January 2020 and has seen a similar spike. As of January 2021, unemployment in Orange County as a whole was 7.4 percent. While the region's economy appears to show signs of recovery, the long-term impacts of the COVID-19 pandemic on employment within Laguna Woods and Orange County remain unknown.

Table D presents the occupations of Laguna Woods residents, based on the 2014–2018 American Community Survey (ACS) estimates. The largest proportion of Laguna Woods residents are employed in educational services and health care and social assistance occupations at 22 percent, followed by finance and insurance and real estate, rental, and leasing occupations at 15.6 percent. Approximately 61 percent of employed residents in Laguna Woods commute less than 25 minutes to work, indicating that a majority of working residents hold jobs within Laguna Woods or in immediately adjacent communities.

Table D: Occupation of Residents (2018)

Occupation	Population	Percent
Agriculture, forestry, fishing and hunting, and mining	0	0.0%
Construction	52	1.7%
Manufacturing	285	9.2%
Wholesale trade	123	4.0%
Retail trade	347	11.2%
Transportation and warehousing, and utilities	78	2.5%
Information	42	1.4%
Finance and insurance, and real estate and rental and leasing	484	15.6%
Professional, scientific, and management, and administrative and waste management services	483	15.5%
Educational services, and health care and social assistance	695	22.4%
Arts, entertainment, and recreation, and accommodation and food services	249	8.0%
Other services, except public administration	188	6.0%
Public administration	83	2.7%
Total Civilians Employed	3,109	100.00%

Source: 2018 ACS 5-year estimates (Table S2405).

Laguna Woods itself has a limited employment base. As of 2019, the five largest employers in Laguna Woods were Laguna Woods Village, Professional Community Management of California, Stater Brothers, Rainbow Realty Corporation, and OCB Restaurant Company.

In 2019, the Orange County Business Council updated the results of its Workforce Housing Scorecard. This report provides a comprehensive evaluation of the current and future state of Orange County's housing supply and demand and its impact on the business community. Based on the following criteria, the scorecard rates each jurisdiction's record over the 2016 to 2030 time period in addressing workforce housing needs:

- Total job growth
- Housing as a percent of total Orange County housing
- Jobs-to-housing ratio
- Change in housing density

Based on the above factors, Laguna Woods ranks 33rd of the 34 cities in Orange County. Rankings are weighted toward larger cities and cities experiencing new housing development (Irvine was ranked 1st); therefore, a ranking of 33rd is expected for Laguna Woods, as it is the 31st largest city within Orange County and has not experienced any new housing growth since the development of the San Sebastian Apartments in 2008. It should be noted that Laguna Woods ranked 26th in job growth, indicating a modest need for new housing within Laguna Woods.

1.2 HOUSEHOLD PROFILE

Household type and size, income levels, and the presence of special-needs populations all affect the type of housing needed by residents and are important indicators of where intervention and/or housing programs may be needed. Household income levels are indicators of housing affordability, just as the ratio of owners to renters may impact the stability of the housing market. This section details the various household characteristics affecting housing needs in Laguna Woods.

1.2.1 Household Type

A household is defined as the total number of persons living in a housing unit, whether related or unrelated. The Census Bureau definition of a "family" is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family. A single person living alone is also a household. "Other" households are unrelated people residing in the same dwelling unit. Group quarters, such as dormitories or convalescent homes, are not considered households.

As shown in Table E, the 2014–2018 ACS estimates there are 11,156 households in Laguna Woods, with an average household size of 1.45 persons and an average family size of 2.07 persons. While the average household size in Laguna Woods saw a 2.8 percent increase from 2010, the average family size decreased by 2.4 percent. Laguna Woods' average household and family size is lower compared to that of Orange County as a whole (3.02 and 3.51, respectively).

Table E: Household Characteristics (2010 and 2018)

Household & Family Type	2010		2018		Percent Change
	Number	Percent	Number	Percent	
Total Population	16,295	100.0%	16,228	100.0%	-0.4%
In Group Quarters	167	1.0%	N/A	N/A	N/A
Total Households	11,470	100.0%	11,156	100.0%	-2.7%
Family Households	3,733	32.5%	4,107	36.8%	10.0%
Married Couple Families	3,215	28.0%	3,645	32.7%	13.4%
Single Parent Households	29	0.3%	0	0.0%	-100.0%
Non-family Households	7,737	67.5%	7,049	63.2%	-8.9%
Householder Living Alone	7,272	63.4%	6,593	59.1%	-9.3%
Householder 65+ (Alone)	6,343	55.3%	5,723	51.3%	-9.8%
Average Household Size	1.41		1.45		2.8%
Average Family Size	2.12		2.07		-2.4%

Sources: (1) 2010 and 2018 ACS 5-year estimates (Table S1101);

(2) 2010 Census (Table PCT38);

N/A = Not Applicable

Nonfamilies constitute the majority of households in Laguna Woods (63 percent). The proportion of single-parent households has also remained steady at approximately 4 percent of all households. Family households constituted about 37 percent of all households in 2018, an increase of 10 percent since 2010. Approximately 90 percent of family households are married-couple households, and this has increased since 2010. The proportion of householders living alone also decreased between 2010 and 2018.

1.2.2 Household Income

Household income is one of the most important factors affecting housing opportunity and determining a household's ability to balance housing costs with other basic necessities of life while avoiding housing problems such as cost burden and overcrowding.

1.2.2.1 Income Definitions

The State and federal governments classify household income into several groupings based upon the relationship to the county area median income (AMI), adjusted for household size. The Housing and Community Development Department of the State of California (HCD) utilizes the income groups presented in Table F. Federal housing programs utilize slightly different income groupings and definitions, with the highest income category generally ending at >95 percent AMI. For purposes of the Housing Element, the State HCD income definitions are used throughout, with the exception of data compiled by the United States Department of Housing and Urban Development (HUD), which is specifically noted.

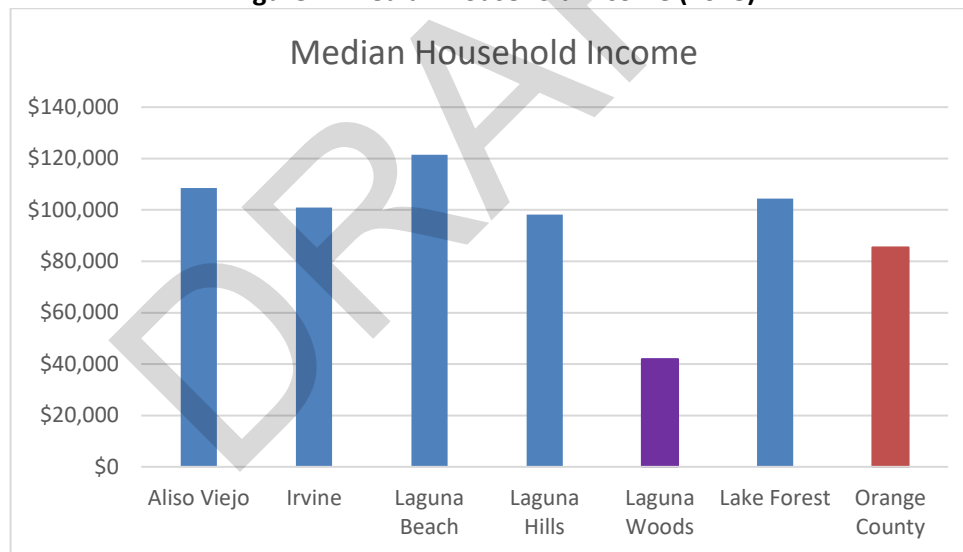
Table F: HCD Income Categories

Income Category	Percent Annual Median Income (AMI)
Extremely Low	0-30% AMI
Very Low	0-50% AMI
Low	51-80% AMI
Moderate	81-120% AMI
Above Moderate	120%+ AMI

Source: California Department of Housing and Community Development.

1.2.2.2 Income Characteristics

The 2014–2018 ACS estimated the median annual income of households in Laguna Woods to be \$41,928. This is an increase of approximately 13 percent from 2010, when the median annual income was \$36,818. Figure 1 illustrates the 2018 median household income for Laguna Woods and surrounding communities and compares them to the median income for Orange County. Of the jurisdictions included, Laguna Woods had a significantly lower median household income than the Orange County median of \$85,398.

Figure 1: Median Household Income (2018)

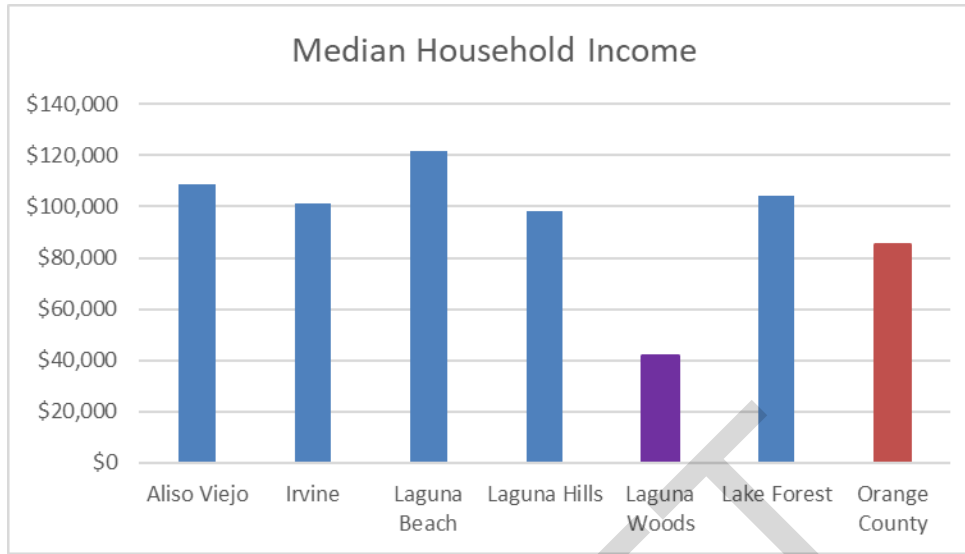


Table G shows the number of Laguna Woods households living within the HCD income categories described above for 2010 and 2017. The number of households within the very low- and low-income categories has decreased overall since 2010. As of 2017, approximately 69 percent of Laguna Woods households fell within one of the lower income categories. The proportion of households with moderate or above-moderate incomes increased from 30.1 percent in 2010 to 31.1 percent in 2017.

Table G: Household Income Levels (2010–2018)

Income Level	2010		2017		2010–2017 Percent Change
	Households	Percent	Households	Percent	
Extremely Low Income (<30% AMI)	2,870	25.2%	2,880	25.6%	0.3%
Very Low Income (31-50% AMI)	2,650	23.3%	2,455	21.8%	-7.4%
Low Income (51-80% AMI)	2,435	21.4%	2,415	21.5%	-0.8%
Moderate/Above Moderate Income (>80% AMI)	3,420	30.1%	3,500	31.1%	2.3%
Total Households	11,375	100.0%	11,250	100.0%	-1.1%

Source: CHAS Data, 2010 and 2017.
AMI = Annual Median Income

Table H shows the income level of Laguna Woods households by tenure. A total of 76 percent of renter households were lower income (<80 percent AMI), compared to 67 percent of owner households. 31 percent of renter households were categorized as extremely low income (<30 percent AMI), and 26 percent were very low income households (31 to 50 percent AMI).

Table H: Household Income Levels by Tenure (2017)

Income Level	Renter		Owner	
	Households	Percent	Households	Percent
Extremely Low Income (<30% AMI)	840	31.2%	2,040	23.8%
Very Low Income (31-50% AMI)	685	25.5%	1,770	20.7%
Low Income (51-80% AMI)	505	18.8%	1,910	22.3%
Moderate Income & Above (> 80% AMI)	660	24.5%	2,840	33.2%

Total	2,690	100.0%	8,560	100.0%
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Source: CHAS Data, 2017.

AMI = Annual Median Income

1.2.2.3 Households in Poverty

The federal government publishes national poverty thresholds that define the minimum income level necessary to obtain the necessities of life. Table I shows the number of households within Laguna Woods living in poverty by household type. A total of 242 households within Laguna Woods are living below the federal poverty threshold, representing approximately 6 percent of all households. Approximately 1 percent of all households in Laguna Woods are female-headed households living below the poverty level. Of these female-headed households living below the poverty level, 9 of the households (or 0.2 percent of all households in Laguna Woods) have children under the age of 18. Another significant group living in poverty are seniors. As shown in Table I, approximately 6 percent of all households in Laguna Woods are senior-headed households living below the poverty level.

Table I: Poverty by Household Type

Household Type	Below Poverty Level	
	Number	Percent
Family Households	242	6.1%
Female-Headed Households	36	0.9%
With Children	9	0.2%
Senior-Headed Households (65+)	230	5.8%

Source: 2019 ACS 5-year estimates.

1.2.3 Special-Needs Populations

State law recognizes that certain households have more difficulty in finding adequate and affordable housing due to special circumstances and may also have lower incomes as a result of these circumstances. Special-needs populations include seniors, persons with disabilities, female-headed households, large households, farmworkers, and the homeless. Table J summarizes the special-needs populations in Laguna Woods. Each of these population groups, as well as their housing needs, is described below.

Table J: Special Needs Groups

Special Needs Group	Persons or Households	Renter	Owner	Percent of Total
Households with a Senior Member	9,701	--	--	88.2%
Senior-headed Households	3,495	--	--	26.3%
Seniors Living Alone	5,622	--	--	42.3%
Single-Parent Households	0	--	--	0.0%
Female Single-Parent Households	0	--	--	0.0%
Large Households (5+ members)	13	0	13	0.3%
Agricultural Workers	0	--	--	0.0%
Persons with Disabilities	4,364	--	--	27.3%
Homeless	5	--	--	0.04%

Note: -- = Data not available.

Sources: (1) 2019 ACS 5-year estimates;

(2) 2019 homelessness point-in-time counts processed by SCAG.

~~-- = Data not available.~~

1.2.3.1 Large Households

Large households consist of five or more persons and are considered a special-needs group due to the limited availability of affordable and adequately sized housing. Large households often live in overcrowded conditions due to both the lack of large-enough units and insufficient income to afford available units of adequate size. In 2018, Laguna Woods had a total of 13 large households, representing 0.3 percent of total households in Laguna Woods. These large households consisted entirely of owner households (Table J). Laguna Woods has a small number of larger homes compared to many communities in the region, with only 100 housing units (0.9 percent of all occupied housing units) containing four or more bedrooms, according to the 2014–2018 ACS. This suggests that Laguna Woods does not have any unmet housing need for large households.

1.2.3.2 Senior Households

Approximately 83 percent of Laguna Woods residents are age 65 or older. This is an increase from 2010, when 80 percent of the population were seniors. Senior-headed households make up a significant proportion (26 percent) of all households in Laguna Woods. Additionally, 42 percent of all households in Laguna Woods are seniors living alone.

Seniors may have a number of special needs including, housing, transportation, health care, and other services. Approximately 30 percent of Laguna Woods' senior population ~~have~~has one or more disability that may need to be taken into consideration when finding appropriate housing. Rising rents are a particular concern due to the fact that most seniors are on fixed incomes.

Laguna Woods is unique in that it predominantly comprises private communities that are age-restricted for adults 55 years and older. Of the housing units in Laguna Woods, the majority are located in the private gated community of Laguna Woods Village, with the remaining units in four separate communities. The various housing options, levels of amenities, and services provided at each of these communities are described below. There is a discrepancy of the total number of housing units located in Laguna Woods between City of Laguna Woods (City) records and the United States Census. It should be noted that the City's records, which reflect the numbers identified below, total 13,386, which is 988 more than what is identified by the United States Census (12,398 housing units).

- **Laguna Woods Village:** Laguna Woods Village contains 12,736 owned condominium and cooperative units. Owners within Laguna Woods Village pay a homeowners' association fee that is used to provide residents with public transportation, patrolled private security, clubhouses with special programs, and recreational activities. Also included within the Laguna Woods Village community are two golf courses for the private use of Laguna Woods Village residents.
- **Las Palmas:** Las Palmas is a licensed residential care community with 184 rental units. Services include the dispensing of medication and assistance with bathing, dressing, and other activities of daily living determined by a care plan tailored to specifically meet the individual needs of the residents. Amenities include meal service, transportation, housekeeping, laundry services, and

access to recreational facilities, including a putting green, shuffleboard court, pool, and spa. Activity programs include regular trips to shopping centers and other destinations.

- **The Regency:** The Regency is a licensed residential care community that consists of 192 rental units for seniors and offers both independent and assisted living on a month-to-month basis. Services and amenities include daily meals, housekeeping, laundry services for bed and bath linens, scheduled transportation, group excursions, and social events. The Regency is the only residential community that, under unique circumstances, will accommodate individuals younger than 55 within its assisted living facility.
- **San Sebastian:** San Sebastian contains 134 rental units, including 17 affordable units for lower-income residents. San Sebastian is also an age-restricted independent living apartment facility; therefore, all of the affordable housing units at San Sebastian are reserved for seniors.
- **Whispering Fountains:** Whispering Fountains contains 140 rental units. Although age-restricted, the Fountains operates as an apartment community and does not provide assisted living services, special programs, or amenities.

Several resources for seniors exist in and near Laguna Woods and include the following:

- **Age Well Senior Services:** This nonprofit organization provides health and wellness programs, home delivery of meals, and nonemergency medical transit service to seniors in Laguna Woods. The organization operates the Florence Sylvester Memorial Senior Center in neighboring Laguna Hills, where it provides congregate meals, social services case management, senior activities and classes, information, and referral services.
- **Foundation of Laguna Woods Village:** This nonprofit organization partners with the Laguna Woods Village Social Services Department to provide temporary emergency financial assistance with supermarket cash cards, prescription payments, bill payments for utility services, medical and dental, caregiver and respite care services, taxi vouchers for travel to health care providers in Orange County, and gas cards to qualifying residents of Laguna Woods Village.
- **Helping Hands Senior Foundation:** This nonprofit organization provides social workers who can connect seniors with free or low-cost in-home health care, palliative care, adult day care, medical equipment, food assistance, and financial assistance resources, as well as provide support with navigating health insurance claims and payments.
- **Laguna Woods Village Social Services Department:** This private organization offers social workers who can help Laguna Woods Village residents with short-term counseling, crisis intervention, support groups, educational programs, long-term care planning, and resource referrals.
- **Orange County Housing Authority:** This government agency is responsible for administering federally funded programs that provide monthly rental assistance to qualified tenants, including low-income seniors, in privately owned rental housing in Orange County. The largest such program is referred to as the Housing Choice Voucher Program. Participants who receive a

Housing Voucher can use this rental assistance in a variety of rental dwellings and locations with almost any property owner who is willing to participate in the program.

Based on the available resources in the community, there is no unmet need for senior housing.

1.2.3.3 Single-Parent Households

Single-parent households typically have a special need for such services as childcare and health care, among others, and often live with only one income. According to the 2014–2018 ACS, Laguna Woods did not have any single-parent households with young children (under the age of 18) (Table J). Therefore, Laguna Woods does not have any unmet housing need for single-parent households, including female-headed households.

1.2.3.4 Persons with Disabilities

Under the Americans with Disabilities Act (ADA), an individual with a disability is defined as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.¹ Major life activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.² Disabled persons often have special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher health costs associated with a disability. In recognition of the fact that disabilities can affect a range of major life activities, the ACS questionnaire gathers data about six key disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care disability, and independent living difficulty. Table K shows the number of Laguna Woods residents with a disability as well as the number of Laguna Woods residents 65 years of age or older that have a disability. According to the 2014–2018 ACS, an estimated 27 percent of Laguna Woods residents (4,364 persons) have one or more disabilities. Approximately 30 percent of the senior population have one or more disabilities.

Table K: Disability Status

Disability Type	Persons with Disability	Percent of Total	Persons with Disability, Age 65+	Percent of Total
With a hearing difficulty	1,844	11.5%	1,733	13.1%
With a vision difficulty	705	4.4%	658	5.0%
With a cognitive difficulty	1,058	6.6%	925	7.0%
With an ambulatory difficulty	2,651	16.6%	2,473	18.7%
With a self-care difficulty	1,180	7.4%	1,123	8.5%

¹ United States Department of Justice. 2020. A Guide to Disability Rights Laws. February. Website: <https://www.ada.gov/cguide.htm#anchor62335> (accessed April 23, 2021).

² United States Department of Labor. 2009. ADA Amendments Act of 2008 Frequently Asked Questions. January 1. Website: <https://www.dol.gov/agencies/ofccp/faqs/americans-with-disabilities-act-amendmentsamendments#:~:text=Major%20life%20activities%20include%2C%20but,thinking%2C%20communicating%20communicating%2C%20and%20and%20working> (accessed April 23, 2021).

With an independent living difficulty	1,774	11.1%	1,650	12.5%
Total Persons with Disabilities	4,364	100.00%	3,972	100.00%

Source: 2019 ACS 5-year estimates (Table S1810)1.

Disabled individuals have unique housing needs because they may be limited in mobility or in their ability to care for themselves. In addition, the earning power of disabled persons may be limited. Their housing need is also often compounded by design and location requirements, which can drive up housing costs. For example, wheelchair-bound or semi-ambulatory individuals may require ramps, holding bars, special bathroom designs, wider doorways, lower cabinets, and other interior and exterior design features. Affordable housing and housing programs that address accessibility can assist these individuals with their specific housing needs.

There are a number of housing types appropriate for people living with a disability: rent-subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Housing Choice vouchers, special programs for home purchase, HUD housing, and group homes. The design of housing accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this needs group. Incorporating barrier-free design in all new multifamily housing (as required by California and federal fair housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (that is, modifications or exceptions) in their zoning and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to allow covered ramps in the setbacks of properties that have already been developed to accommodate residents with mobility impairments.

The City does not require special building codes or onerous project review to construct, improve, or convert housing for persons with disabilities. Community care facilities with six or fewer persons are permitted by right in all residential zoning districts. Community care facilities with seven or more persons are permitted in all residential zoning districts, subject to Conditional Use Permit (CUP) approval. In addition, several housing types for persons with disabilities require a CUP that is no more stringent than those for other conditional uses:

- Congregate care facilities are permitted with an approved use permit in all residential zones and the Community Commercial (CC) zone.
- Family Day Care for 14 or fewer persons is also permitted in the Residential Multifamily (RMF) and Residential Community (RC) zones.

The City has adopted the 2019 California Building Code (CBC). Standards within the CBC include provisions to ensure accessibility for persons with disabilities. These standards are consistent with the Americans with Disabilities Act. No local amendments that would constrain accessibility or increase the cost of housing for persons with disabilities have been adopted.

As discussed previously, Laguna Woods has two residential care facilities that are licensed by the State Community Care Licensing Division of the California Department of Social Services: Las Palmas and the Regency.

1.2.3.5 Developmentally Disabled

According to California Welfare and Institutions Code Section 4512, a developmental disability means “a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. As defined by the Director of Developmental Services, in consultation with the Superintendent of Public Instruction, this term shall include intellectual disability, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with an intellectual disability, but shall not include other handicapping conditions that are solely physical in nature.”

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person’s living situation as a child to an appropriate level of independence as an adult.

The California Department of Developmental Services (DDS) estimates that 30 persons with developmental disabilities were residing in Laguna Woods as of December 2020. All of the individuals with developmental disabilities residing in Laguna Woods were over the age of 18, and the majority of the developmentally disabled individuals in Laguna Woods live in the home of their parent, family, or guardian.

The Regional Center of Orange County is one of 21 regional centers in the State that provides point of entry to services for people with developmental disabilities. The center is a private, nonprofit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

The most obvious housing need for persons with disabilities is housing that is adapted to their needs. Most single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility. Location of housing is also an important factor for many persons with disabilities, as they often rely upon public transportation to travel to necessary services and shops. “Barrier free design” housing, accessibility modifications, proximity to services and transit, and group living opportunities are important in serving this group.

Within Laguna Woods, there are services currently in place tailored to mobility-impaired individuals including private bus services and subsidized taxi service that supplement public transportation options. The City has also adopted a reasonable-accommodations ordinance designed to reduce barriers for special-needs populations.

1.2.3.6 Homelessness

In collaboration with other nonprofit organizations, the Orange County Department of Community Resources is responsible for the countywide biennial point-in-time homeless count. For the purpose of the point-in-time count, the definition of homelessness includes unsheltered individuals and families “with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.” The count of sheltered homeless individuals and families includes those “living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, ~~state~~State, or local government programs for low-income individuals)” on the night designated for the count.

Based upon the 2019 point-in-time count, there were a total of 6,860 homeless individuals residing within Orange County, with 5 individuals counted in Laguna Woods. All of the homeless individuals within Laguna Woods were unsheltered, as there are no homeless shelters located within Laguna Woods. Since 2013, the homeless population in Orange County has steadily increased, with the largest increase occurring between 2017 and 2019 (43 percent increase). The 2019 Count indicated that all five of those counted within Laguna Woods were individuals and not part of a family unit experiencing homelessness.

People experiencing homelessness include families and individuals representing every race, age group, and community in Orange County. As the cost of living in Orange County and in all of Southern California continues to rise, and as unemployment remains high, homelessness has become more prevalent.

In the past, several factors have contributed to homelessness, including difficulty in obtaining employment, lack of ongoing care for the mentally ill, substance abuse, and inadequate education. In recent years, however, a shortage of affordable housing opportunities coincident with a growing population of low-income renters has added to the problem.

Residential care facilities, which are facilities for individuals who require 24-hour supervision but who do not generally need medical care beyond routine health checks and medication monitoring, are permitted in Laguna Woods in any district, planned community, or specific plan area zoned for residential uses. The State of California is the authority for licensing, inspection, and enforcement for community care facilities throughout California. The State has preempted local controls over certain types of residential care facilities.

The County of Orange coordinates a comprehensive regional Continuum of Care (CoC) system to address homelessness in Orange County. The CoC is a housing and service delivery system for the homeless and is designed to do the following:

- Promote communitywide commitment to the goal of ending homelessness through regional coordination and collaboration.

- Advocate for funding and resources to end homelessness and provide funding for proven efforts by nonprofit providers, states, and local governments to quickly rehouse people experiencing homelessness, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness.
- Promote access to and effective utilization of mainstream programs by homeless individuals and families.
- Promote implementation of best practices and evidence-based approaches to homeless programming and services.

Other organizations and facilities in nearby or surrounding communities that may provide shelter and services to people experiencing homelessness in Laguna Woods are listed in Table L. It should be noted that some of these facilities prioritize their services to people experiencing homelessness who have a relationship to the cities in which they are located.

Table L: Local Facilities for Persons Experiencing Homelessness

Organization/Facility	Beds and/or Services Provided
Alternative Sleeping Location Emergency Shelter (operated by Friendship Shelter) 20652 Laguna Canyon Rd Laguna Beach, CA 92651 (949) 494-6928	Provides emergency night shelter for up to 45 people, a 30-day rapid housing program, as well as a drop-in day program between the hours of 10:00 a.m. and 1:00 p.m. This organization prioritizes services to those people experiencing homelessness who have a relationship to Laguna Beach.
Bridge Housing Program (operated by Friendship Shelter) PO Box 4252 Laguna Beach, CA 92652 (949) 494-6928	Provides dormitory-style housing for up to 32 people at a time, with all meals, case management, and an array of support services provided. Serves 120-140 individuals annually. This organization also provides a permanent supportive housing program intended for clients who are chronically homeless and are unable to work due to a disability, including physical or mental health conditions. Clients are housed in scattered-site apartments and receive ongoing supportive services from Friendship Shelter staff. This organization prioritizes services to those people experiencing homelessness who have a relationship to Laguna Beach.
Human Options 5540 Trabuco Road Irvine, CA 92620 (949) 737-5242	Provides emergency shelter for individuals or families in domestic violence situations seeking shelter. Serves approximately 350 adults and children annually. Services include individual and group counseling, case management, legal advocacy, and children's programs. Also provides a transitional housing program.
Laura's House 999 Corporate Drive, Suite 225 Ladera Ranch, CA 92694 (949) 361-3775	Provides emergency shelter (52 beds) for up to 45 days for individuals or families in domestic violence situations seeking shelter. Services include individual and group counseling, life skills classes, case management, legal advocacy, and children's programs. Also provides transitional housing for 5-7 families at a time for 3-6 months.
Orange County Rescue Mission One Hope Drive Tustin, CA 92782 (714) 247-4379	Provides transitional, recuperative, and emergency housing for up to 262 homeless men, women, and children. Services include medical and dental care, meals, job training, case management, substance abuse treatment, parent training, anger management training, mental health care assessment and treatment, housing assistance and placement, and life skills training.

Note: Compiled in 2021 by LSA, 2021, B based on information from <https://www.homelesshelterdirectory.org/> and the individual websites for each service provider.

1.2.3.7 Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through seasonal agricultural work. Farmworkers have special housing needs because they earn lower incomes than many other workers and move throughout the season from one harvest to the next. The 2015–2019 ACS estimates that there are no Laguna Woods residents who hold farming, fishing, or forestry occupations. There is no agriculturally designated land within Laguna Woods.

The United States Department of Agriculture National Agriculture Statistics provide state- and county-level data on hired farm labor across the United States. Within Orange County, a total of 99 farms reportedly hired 1,772 workers in 2017. Permanent workers, those who work 150 days or more, represent the largest category of workers with 1,106 workers (62 percent). A total of 666 workers (38 percent) are considered seasonal and work less than 150 days. Orange County

reported 340 migrant workers (19 percent) with full-time hired labor and 176 unpaid workers in 2017.

Although there are no farmworkers identified within Laguna Woods, the median annual salary for the agriculture, forestry, fishing, hunting, and mining industry in Orange County in 2019 was \$24,592, which is 29 percent of the Orange County median income (\$85,398) and is considered a very low income (2019). Because farmworkers make up no percentage of Laguna Woods' total population, no specific programs for this special-needs group are necessary. Given the limited need to provide for farmworker housing in Orange County, the City's efforts to provide housing at affordable prices to very-low income households should address the needs of permanent and seasonal farmworker populations.

1.3 HOUSING STOCK CHARACTERISTICS

This section identifies the characteristics of Laguna Woods' physical housing stock. This includes an analysis of housing growth trends, housing conditions, housing prices and rents, and housing affordability.

1.3.1 Housing Growth

Table M shows housing production in Laguna Woods, compared to neighboring cities and Orange County as a whole. According to the California Department of Finance, Laguna Woods experienced a slight reduction in housing units between 2000 and 2010. This is in contrast to Orange County, which saw an almost 8 percent increase in housing stock over the same decade. The surrounding communities of Irvine and Lake Forest saw large amounts of new housing construction in the early 2000s.

Table M: Regional Housing Growth Trends

Jurisdiction	Total Housing Units			Percent Change	
	2000	2010	2020	2000–2010	2010–2020
Laguna Woods	13,629	13,079	13,079	-4.0%	0.0%
Aliso Viejo	N/A	18,861	20,192	N/A	7.1%
Irvine	53,711	81,110	108,822	51.0%	34.2%
Laguna Beach	12,965	12,923	13,027	-0.3%	0.8%
Laguna Hills	10,324	10,989	11,298	6.4%	2.8%
Lake Forest	20,486	27,161	30,244	32.6%	11.4%
Orange County	969,484	1,046,118	1,111,421	7.9%	6.2%

Sources: (1) CA Dept. of Finance E-8 Historical Population and Housing Estimates, 2010.

(2) CA Dept. of Finance E-5 Population and Housing Unit Estimates, 2020.

N/A = Not Applicable

The California Department of Finance estimates that in 2020 there were 13,079 housing units within Laguna Woods. This has remained consistent since 2010. The increase in housing stock in Orange County was notably higher at 6 percent. As Laguna Woods is a maturing suburban community with primarily small site and infill development, it is expected that the increase in the housing stock in Laguna Woods would be modest and lower than the countywide rate.

1.3.2 Housing Type and Tenure

Table N presents the mix of housing types in Laguna Woods. The California Department of Finance estimates that of the 13,079 units in Laguna Woods, 4,639 are single-family units (36 percent). Approximately 65 percent of Laguna Woods' housing stock is multifamily units. Laguna Woods also has no mobile home parks within its local housing stock. The composition of Laguna Woods' housing stock has remained relatively unchanged over the last two decades.

Table N: Housing Units by Type (2000–2020)

Unit Type	2000		2010		2020	
	Units	Percent	Units	Percent	Units	Percent
Single-Family (SF) Detached	675	5.3%	918	7.0%	918	7.0%
SF Attached	3,726	29.4%	3,721	28.5%	3,721	28.5%
Total SF	4,401	34.8%	4,639	35.5%	4,639	35.5%
2 to 4 Units	2,298	18.2%	2,237	17.1%	2,237	17.1%
5 or more units	5,934	46.9%	6,203	47.4%	6,203	47.4%
Total Multi-Family	8,232	65.0%	8,440	64.5%	8,440	64.5%
Mobile Homes & Other	15	0.1%	0	0.0%	0	0.0%
Total Housing Units	12,657	100.0%	13,079	100.0%	13,079	100.0%
Vacancy Rate	7.52%	--	11.7%	--	10.8%	--

Sources: (1) U.S. Census Bureau, 2000 and 2010 Census.

(2) CA Dept. of Finance E-5 Population and Housing Unit Estimates, 2020.

Housing tenure refers to whether a housing unit is owned, is rented, or is vacant. Tenure is an important indicator of the housing climate of a community, reflecting the relative cost of housing opportunities and the ability of residents to afford housing. Tenure also influences residential mobility, with owner units generally evidencing lower turnover rates than rental housing. Table O indicates the total number of renter-occupied and owner-occupied housing units in Laguna Woods in 2010 and 2018. The ownership rate within Laguna Woods has declined slightly from 78 percent in 2010 to 74 percent in 2018. However, the homeownership rate continues to be higher than the countywide homeownership rate of 57 percent.

Table O: Housing Tenure (2010 and 2018)

Occupied Housing Units	2010		2018	
	Households	Percent	Households	Percent
Renter	2,523	22.0%	2,851	25.6%
Owner	8,947	78.0%	8,305	74.4%
TOTAL	11,470	100%	11,156	100%

Source: 2010 and 2018 ACS 5-year estimates.

1.3.3 Vacancy Rate

A vacancy rate measures the overall housing availability in a community and is often a good indicator of how efficiently for-sale and rental housing units are meeting the current demand for housing. A vacancy rate of 5 percent for rental housing and 2 percent for ownership housing is generally considered healthy and suggests that there is a balance between the demand and supply of housing. A lower vacancy rate may indicate that households are having difficulty in finding

housing that is affordable, leading to overcrowding or households having to pay more than they can afford. A low vacancy rate or a particularly tight housing market may also lead to high competition for units, raising rental and housing prices substantially.

The 2014–2018 ACS estimated that the vacancy rate for owner-occupied units was 2.3 percent, and the rental vacancy rate was 5.9 percent. These vacancy rates suggest a relatively healthy housing market for both residents looking to purchase a home and renters.

1.3.4 Housing Age and Condition

The age of a community's housing stock can provide an indicator of overall housing conditions. Typically, housing over 30 years in age is likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work, and other repairs. Table P displays the age of occupied housing stock by tenure as of 2018. Over two-thirds of Laguna Woods' housing stock was built between 1960 and 1979. Of Laguna Woods' current housing stock, approximately 98 percent will be over 30 years old by the end of the 2021 to 2029 planning cycle. As a built-out community, Laguna Woods has a low proportion of newer units, with less than 0.8 percent built since 2000.

Table P: Age of Housing Stock (2019)

Year Structure Built	Renter-Occupied Units		Owner-Occupied Units		Total Occupied Units	
	Number	Percent	Number	Percent	Number	Percent
2010 or later	12	0.4%	0	0.0%	12	0.1%
2000-2009	58	2.0%	14	0.2%	72	0.7%
1980-1999	377	12.9%	391	4.8%	768	7.0%
1960-1979	2,229	76.1%	6,874	85.1%	9,103	82.7%
1940-1959	254	8.7%	718	8.9%	972	8.8%
1939 or earlier	0	0.0%	76	0.9%	76	0.7%
Total	2,930	100.0%	8,073	100.0%	11,003	100.0%

Source: 2019 ACS 5-year estimates.

A greater proportion of rental housing (12.9 percent) was constructed between 1980 and 1999, when compared to owner-occupied housing (4.8 percent). Conversely, a greater proportion of owner-occupied housing was constructed between 1960 and 1979 (85 percent), compared to renter-occupied housing (82 percent).

The City's code enforcement services provider indicated that the City opened 88 cases in 2019 and 123 cases in 2020, the majority of which related to commercial properties (87.5 percent in 2019 and 86.9 percent in 2020). The City's code enforcement services provider conducted a windshield survey in early October 2021 of all residential units within Laguna Woods to identify housing units with visible signs of damage or disrepair (e.g., deteriorated roofs, stucco damage, and broken or deteriorated windows) in an effort to estimate the number of housing units that are in need of rehabilitation and replacement. The windshield survey identified only five locations with minor maintenance issues, including minor wood rot, minor water damage on an exterior wall, and a crack at the top of a window. Given the small number of code enforcement cases and limited extent of the issues identified in the windshield survey, it is reasonable to conclude that Laguna Woods is a generally well-maintained community. Most of the City's housing stock is located within actively

managed communities with boards or associations and on-site property management that ensure adequate maintenance. Consequently, there are few violations or complaints related to residential properties that require City intervention.

Due to ~~the City's~~Laguna Woods' relative lack of substandard housing and health and safety code violations, the City does not require any specialized code enforcement programs (e.g., occupancy inspection, rental inspection, or neighborhood enhancement). Nevertheless, the Housing Element includes a program for the City to 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. As the name suggests, this effort is meant to be proactive to help promote the good condition and upkeep of Laguna Woods' housing stock.

1.3.5 Housing Costs and Affordability

The cost of housing is directly related to the extent of housing problems in a community. If housing costs are relatively high in comparison to household income, there will be a higher prevalence of overpayment and overcrowding. This section summarizes the cost and affordability of the housing stock to Laguna Woods residents.

1.3.5.1 Rental Housing Market

According to the 2014–2018 ACS, the rental vacancy rate in Laguna Woods was 5.9 percent, indicating a tight rental market in Laguna Woods. A point-in-time survey of available rental units within Laguna Woods listed on Zillow and Apartments.com was conducted in early April 2021. While not comprehensive, it provides a snapshot of the types of units available, as well as typical market rents. Table Q includes the results of the survey by number of bedrooms.

**Table Q: Median and Average Market Rents by Number of Bedrooms
(April 2021)**

Number of Bedrooms	Units Advertised	Rent Range	Average Rent	Median Rent
0	2	\$2,320-\$2,520	\$2,420	\$2,420
1	16	\$1,550-\$2,700	\$2,039	\$1,825
2	58	\$2,150-\$3,950	\$2,378	\$2,200
3	5	\$2,400-\$3,950	\$2,964	\$2,895
All Units	81	\$1,550-\$3,950	\$2,349	\$2,200

Source: Zillow.com and Apartments.com, accessed April 9, 2021.

A total of 81 units were listed for rent, with a median rent of \$2,200. Two-bedroom units were the most prevalently available in Laguna Woods, with rents ranging from \$2,150 to \$3,950 and a median rent of \$2,200.

1.3.5.2 Homeownership Market

Table R shows median home sale prices over 2 years for Laguna Woods and nearby communities. The February 2021 median home sales price in Laguna Woods represented a 14.5 percent decrease from February 2020. In contrast, Orange County as a whole experienced an increase in median sales prices during that time period, and many neighboring jurisdictions also saw only slight to moderate increases. With the exception of Laguna Woods, all of the communities listed experienced an increase in home sale prices between February 2020 and February 2021, with Aliso Viejo and Laguna Beach seeing double-digit increases. In February 2021, the median home sales price for Laguna Woods was \$325,000, representing a decrease of over 14 percent from February 2020. Given that this price decline is somewhat anomalous in comparison to other nearby cities, it may be tied to the severe impacts that the COVID-19 pandemic has had on the senior population.

Table R: Annual Median Home Prices (2020–2021)

Jurisdiction	February 2020 Median Sales Price	February 2021 Median Sales Price	Percent Change 2020–2021
Laguna Woods	\$380,000	\$325,000	-14.5%
Aliso Viejo	\$545,000	\$675,000	23.9%
Irvine	\$871,500	\$900,000	3.3%
Laguna Beach	\$1,972,500	\$2,230,000	13.1%
Laguna Hills	\$785,000	\$813,000	3.6%
Lake Forest	\$742,000	\$789,000	6.3%
Orange County	\$748,500	\$820,000	9.6%

Source: Corelogic.com, California Home Sale Activity by City, February 2021.

1.3.5.3 Housing Affordability

The affordability of housing in Laguna Woods can be assessed by comparing market rents and sales prices with the amount that households of different income levels can afford to pay for housing. Compared together, this information can reveal who can afford what size and type of housing as well as indicate the ~~typetypes~~ of households that would most likely experience overcrowding or overpayment.

Table S provides estimates of affordable rents and home prices based on HCD's 2021 income limits for Orange County; current mortgage rates (i.e., 3.0 percent for a 30-year fixed-rate mortgage); and cost assumptions for utilities, taxes, and insurance.

Based on the housing costs presented earlier in Table R, Laguna Woods residents with lower incomes are unable to afford purchasing a home in Laguna Woods. Additionally, based on the overall median rent presented in Table Q, affordable rentals for lower-income households are difficult to find in Laguna Woods.

Extremely Low-Income Households. Extremely low-income households earn 30 percent or less of the AMI. Based on the assumptions utilized for Table S, the affordable home price for an extremely low-income household ranges from \$66,158 for a five-person household to \$79,721 for a two-person household; therefore, homeownership is out of reach for Laguna Woods residents within this income category. Affordable rents for extremely low-income households range from \$507 to \$637 per month. ~~Based on the median rents presented in Table Q, even one-bedroom units are~~

~~unaffordable for all extremely low income households. Severe overpayment or overcrowding may occur as a result of the gap between market costs and affordability.~~

~~**Very Low Income Households.** Very low income households earn between 30 percent and 50 percent of the AMI. Very low income households can afford between \$979 and \$1,359 on monthly rent, depending on household size. However, based on the market rents presented in Table Q, rental units of any size in Laguna Woods would require a very low income household to pay over the affordability threshold of 30 percent. Home ownership is also unaffordable for very low income households in Laguna Woods, with affordable home prices for this income category ranging from \$149,297 to \$190,607, well below Laguna Woods' median home sales price of \$325,000 in February 2021.~~

Table S: Estimated Affordable Housing Price by Income and Household Size (2021)

	Annual Income Limits	Affordable Monthly Housing Cost	Utility Allowance (2020)	Taxes, Insurance and HOA	Affordable Home Price	Affordable Rent
Extremely Low Income (0–30% AMI)						
1-Person (studio)	\$28,250	\$706	\$199	\$247	\$68,591	\$507
2-Person (1 bedroom)	\$32,300	\$808	\$222	\$283	\$79,721	\$586
3-Person (2 bedroom)	\$36,350	\$909	\$293	\$318	\$78,471	\$616
4 Person (3 bedroom)	\$40,350	\$1,009	\$372	\$353	\$74,783	\$637
5 Person (4 bedroom)	\$43,600	\$1,090	\$457	\$382	\$66,158	\$633
Very Low Income (30–50% AMI)						
1-Person	\$47,100	\$1,178	\$199	\$412	\$149,297	\$979
2-Person	\$53,800	\$1,345	\$222	\$471	\$171,829	\$1,123
3-Person	\$60,550	\$1,514	\$293	\$530	\$182,043	\$1,221
4 Person	\$67,250	\$1,681	\$372	\$588	\$190,080	\$1,309
5 Person	\$72,650	\$1,816	\$457	\$636	\$190,607	\$1,359
Low Income (50–80% AMI)						
1-Person	\$75,300	\$1,883	\$199	\$659	\$270,000	\$1,684
2-Person	\$86,050	\$2,151	\$222	\$753	\$309,992	\$1,929
3-Person	\$96,800	\$2,420	\$293	\$847	\$337,335	\$2,127
4 Person	\$107,550	\$2,689	\$372	\$941	\$362,569	\$2,317
5 Person	\$116,200	\$2,905	\$457	\$1,017	\$377,130	\$2,448
Median Income (80–100% AMI)						
1-Person	\$74,700	\$1,868	\$199	\$654	\$267,365	\$1,669
2-Person	\$85,350	\$2,134	\$222	\$747	\$306,962	\$1,912
3-Person	\$96,050	\$2,401	\$293	\$840	\$334,238	\$2,108
4 Person	\$106,700	\$2,668	\$372	\$934	\$358,814	\$2,296
5 Person	\$115,250	\$2,881	\$457	\$1,008	\$373,243	\$2,424
Moderate Income (100–120% AMI)						
1-Person	\$89,650	\$2,241	\$199	\$784	\$331,604	\$2,042
2-Person	\$102,450	\$2,561	\$222	\$896	\$380,359	\$2,339
3-Person	\$115,250	\$2,881	\$293	\$1,008	\$416,465	\$2,588
4 Person	\$128,050	\$3,201	\$372	\$1,120	\$450,462	\$2,829
5 Person	\$138,300	\$3,458	\$457	\$1,210	\$471,875	\$3,001

Sources: (1) HCD, 2021₁

(2) Orange County Housing Authority Utility Allowance Schedule, December 2020₂

(3) LSA Associates, Inc., 2021₃

Assumptions: 2021 HCD income limits; 30.0% gross household income as affordable housing cost; 35.0% of monthly affordable cost for taxes and insurance, 10% down payment; and 3.0% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on Orange

County Housing and Community Development Utility Allowance Schedule.
AMI = Annual Median Income
HOA = Homeowners Association

per month. Based on the median rents presented in Table Q, even one-bedroom units are unaffordable for all extremely low-income households. Severe overpayment or overcrowding may occur as a result of the gap between market costs and affordability.

Very Low-Income Households. Very low-income households earn between 30 percent and 50 percent of the AMI. Very low-income households can afford between \$979 and \$1,359 on monthly rent, depending on household size. However, based on the market rents presented in Table Q, rental units of any size in Laguna Woods would require a very low-income household to pay over the affordability threshold of 30 percent. Home ownership is also unaffordable for very low-income households in Laguna Woods, with affordable home prices for this income category ranging from \$149,297 to \$190,607, well below Laguna Woods' median home sales price of \$325,000 in February 2021.

Low-Income Households. Low-income households earn between 50 and 80 percent of the AMI. Depending on household size, a low-income household can afford monthly rent between \$1,684 and \$2,448. Based on the market rents in listed Table Q, low-income households would generally be able to afford some one-bedroom units in Laguna Woods. However, larger rental units are still unaffordable for this income category, which may result in overpayment or overcrowding due to larger families renting smaller units. Based on Table S, low-income households can afford home sale prices between \$270,000 and \$377,130. Therefore, homeownership remains largely out of reach for this income group when compared with Laguna Woods' median home sales price as low-income households may only be able to afford the purchase of a small home.

Median-Income Households. Median-income households earn between 80 and 100 percent of the AMI. Median-income households can afford to purchase a home with a purchase price ranging from \$267,365 to \$373,243. With Laguna Woods' median home sales price at \$325,000 in February 2021, homeownership is affordable for median-income households seeking a smaller home. Median-income households can afford a monthly rent payment ranging from \$1,669 for a one-person household to \$2,424 for a five-person household. Based on median market rents within Laguna Woods, median-income households can generally afford one- and two-bedroom rental units, and larger households may be able to afford some lower-priced three-bedroom units. However, four- and five-person households may be overcrowded into smaller units or overpay to afford an appropriately sized unit.

Moderate-Income Households. Moderate-income households earn 100 to 120 percent of the AMI. Moderate-income households can afford a home sales price ranging from \$331,604 to \$471,875. Therefore, with the median home sales price in Laguna Woods at \$325,000 in February 2021, homeownership is affordable to households with moderate incomes. Moderate-income households can afford monthly rent from \$2,042 for a one-person household to \$3,001 for a five-person household. Based on the market rents presented in Table Q, moderate-income households can generally afford one-, two-, and three-bedroom units within Laguna Woods.

1.3.6 Assisted Housing at Risk of Conversion

State Housing Element law requires an analysis of the potential for currently rent-restricted low-income housing units to convert to market rate housing and to propose programs to preserve or replace any units “at risk” of conversion. This section presents an inventory of all assisted rental housing in Laguna Woods and evaluates those units at risk of conversion during the 8-year 2021 to 2029 planning period.

1.3.6.1 Assisted Housing Inventory

Laguna Woods contains one development of assisted multifamily rental housing with 17 affordable units, as presented in Table T. This inventory includes all multifamily rental units assisted under federal, State, and local programs, including HUD, State/local bond programs, density bonus, inclusionary, and local direct assistance programs. As no units within Laguna Woods are at risk of conversion to market rate units in 10 years or less, an analysis has not been conducted to evaluate the replacement value, qualified entities to manage such a project, or potential funding sources for at-risk units.

Table T: Inventory of Subsidized Rental Housing for Lower Income Households

Project Name	Tenant Type	Total Units	Affordable Units	Applicable Programs	Potential Conversion Date
Not At-Risk					
San Sebastian	Senior	134	17	Density Bonus	October 16, 2054
Total		134	17		

1.3.7 Existing Housing Needs

1.3.7.1 Overpayment

Overpayment remains a critical issue for many Laguna Woods residents, particularly renters and lower-income households. Affordability problems occur when housing costs become so high in relation to income that households have to pay an excessive proportion of their income for housing. According to the metric utilized by HUD, a household is cost burdened if housing costs (including utilities) exceed 30 percent of gross household income. Severe cost burden occurs when housing costs exceed 50 percent of gross income.

Table U indicates the number of cost-burdened households within Laguna Woods by tenure. As shown in Table U, overpayment impacts 70 percent of renter households and nearly 41 percent of owner households. More renter households are also impacted by severe cost burden (45 percent), compared to owner households (22 percent).

Table U: Cost Burden by Tenure

	Renter Households		Owner Households		Total Households	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
With Cost Burden >30%	1,885	70.1%	3,475	40.6%	5,360	47.6%
With Cost Burden >50%	1,210	45.0%	1,875	21.9%	3,085	27.4%
Total	2,690	100.0%	8,560	100.0%	11,250	100.0%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2017 ACS 5-year estimates.

ACS = American Community Survey

HUD = United States Department of Housing and Urban Development

Table V provides more detailed information on cost burden by income group, tenure, and household type. Overall, cost burden tends to impact proportionately more senior renters than senior homeowners, with the exception of low-income senior renters. Rates of overpayment for small families who rent were 100 percent in the very low and low-income categories. Extremely low-income small-family households who own their own homes are also heavily impacted, with 97 percent experiencing a cost burden and 83 percent experiencing a severe cost burden. As described earlier, Laguna Woods has very few large-family households. Of the few large-family households in Laguna Woods, none are affected by a high cost burden.

~~1.3.7.21.1.1.1 Overcrowding~~

~~The United States Census defines overcrowding as an average of more than one person per room in a housing unit, including the living and dining room but excluding kitchens, bathrooms, and hallways. Severe overcrowding occurs when a unit is occupied by more than 1.5 persons per room. The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding can also occur when housing costs are high in relation to income and families are forced to live together in order to pool income to pay the rent or mortgage. Table W shows the incidence of overcrowding in Laguna Woods by tenure, as estimated by the 2014-2018 ACS.~~

Table V: Cost Burden by Income Level, Tenure, and Household Type

Income Group	Cost Burden	Seniors			Small Family			Large Family		
		>30%	>50%	Total	>30%	>50%	Total	>30%	>50%	Total
Extremely Low (≤ 30% HAMFI ²)	Owner	79%	69%	1865	97%	83%	30	0%	0%	0
	Renter	87%	86%	800	0%	0%	0	0%	0%	0
Very Low (31-50% HAMFI)	Owner	52%	16%	1750	0%	0%	0	0%	0%	0
	Renter	77%	57%	635	100%	100%	4	0%	0%	0
Low (51-80% HAMFI)	Owner	25%	6%	1780	0%	0%	50	0%	0%	0
	Renter	85%	19%	455	100%	0%	20	0%	0%	0
Moderate (81-100% HAMFI)	Owner	15%	3%	965	13%	0%	75	0%	0%	0
	Renter	65%	0%	200	0%	0%	15	0%	0%	0
Above Moderate (>100% HAMFI)	Owner	3%	0%	1580	0%	0%	105	0%	0%	0
	Renter	3%	0%	375	0%	0%	15	0%	0%	0

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2017 ACS 5-year estimates.

¹ Data presented in this table are based on special tabulations from the ACS data. Due to the small sample size, the margins for error can be significant. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.

² HAMFI = HUD Area Median Family Income

ACS = American Community Survey

HUD = United States Department of Housing and Urban Development

1.3.7.2 Overcrowding

The United States Census defines overcrowding as an average of more than one person per room in a housing unit, including the living and dining room but excluding kitchens, bathrooms, and hallways. Severe overcrowding occurs when a unit is occupied by more than 1.5 persons per room. The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding can also occur when housing costs are high in relation to income and families are forced to live together in order to pool income to pay the rent or mortgage. Table W shows the incidence of overcrowding in Laguna Woods by tenure, as estimated by the 2014–2018 ACS.

Table W: Overcrowding by Tenure

Overcrowding	Laguna Woods		Orange County	
	Number	Percent of Total	Number	Percent of Total
Owner Occupied Units	8,305	100.0%	592,269	100.0%
Not Overcrowded (1.00 or Less Occupants/Room)	8,292	99.8%	570,469	96.3%
Overcrowded				
1.01 to 1.50 Occupants/Room	0	0.0%	15,731	2.7%
1.51 or More Occupants/Room	13	0.2%	6,069	1.0%
Renter Occupied Units	2,851	100.0%	440,104	100.0%
Not Overcrowded (1.00 or Less Occupants/Room)	2,851	100.0%	370,391	84.2%
Overcrowded				
1.01 to 1.50 Occupants/Room	0	0.0%	43,900	10.0%
1.51 or More Occupants/Room	0	0.0%	25,813	5.9%
Total Overcrowded	13	0.1%	91,513	8.9%

Source: 2018 ACS 5-year estimates.

As shown in Table W, an estimated total of 13 households experienced overcrowding in Laguna Woods in 2018, representing just under 0.1 percent of all households in Laguna Woods. Countywide, approximately 9 percent of households experienced overcrowded conditions. All 13 of the households in Laguna Woods that experience overcrowding are in the severe overcrowding category.

1.3.7.3 Displacement and Disproportionate Housing Needs

Using the Urban Displacement Project's Gentrification and Displacement maps, the westernmost areas of Laguna Woods fall into the following displacement typologies:³

- Stable/advanced exclusive (with risk factors of being susceptible to rent change);
- Stable moderate/mixed-income (with risk factors of being located in an area that is susceptible to rent change, has a rent gap, and is a hot market); and
- Low-income/susceptible to displacement (with risk factors of being mostly low income, being located in an area that is susceptible to rent change, has a rent gap, and is a hot market).

³ Los Angeles – Gentrification and Displacement. *Urban Displacement Project*. Website: <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/> (accessed October 1, 2021).

The eastern and southernmost areas fall into the following displacement typologies:

- At risk of becoming exclusive (with risk factors of being located in an area that is susceptible to rent change and that has a rent gap, and is a hot market);
- Low-income/susceptible to displacement (with risk factors of being mostly low income, being located in an area that is susceptible to rent change, has a rent gap, and is a hot market); and
- Ongoing displacement (with risk factors of being mostly low income, being located in an area that is susceptible to rent change, has a rent gap, and is a hot market).

Job displacement risk varies throughout Laguna Woods, with the lowest rate being 5.2 percent in central Laguna Woods, and the highest rate being 23.8 percent in the easternmost part of Laguna Woods.

In summary, although the majority of Laguna Woods has a low risk of displacement, certain sections of Laguna Woods, particularly the eastern and southernmost areas, and specifically Census Tract 626.46, are either susceptible to displacement or experiencing ongoing displacement, as well as at risk for job displacement.

1.4 AFFIRMATIVELY FURTHERING FAIR HOUSING

In January 2019, Assembly Bill (AB) 686 introduced an obligation to affirmatively further fair housing (AFFH) into California ~~state~~State law. AB 686 defined “affirmatively further fair housing” to mean “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” for persons of color, persons with disabilities, and other protected classes. AB 686 added an assessment of fair housing to the Housing Element that includes the following components: a summary of fair housing issues and assessment of local fair housing enforcement and outreach capacity, an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

To assist in this analysis, 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~~State agencies/~~departments~~departments to further the fair housing goals (as defined by HCD).” The California Fair Housing Task Force has created ~~Opportunity Maps~~opportunity maps to identify resource levels across the ~~state~~State “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs).” These opportunity maps are made from composite scores of four different domains made up of a set of indicators. Table X shows the full list of indicators.

Table X: Domains and Lists of Indicators for Opportunity Maps

Domain	Indicator
Economic	<ul style="list-style-type: none">• Poverty• Adult education• Employment

	<ul style="list-style-type: none"> • 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, Methodology for the 2020 TCAC/HCD Opportunity Maps, June 2020.

1.4.1 Fair Housing Issues

1.4.1.1 Discrimination

The Fair Housing Council of Orange County (FHCOC) works to ensure equal access to housing opportunities and elimination of housing discrimination by providing services throughout Orange County including community education, individual counseling, mediation, and low-cost advocacy. Questions received by the City regarding potential housing discrimination are referred to the FHCOC. The City does not have a record of the number of issues or complaints within Laguna Woods that the FHCOC has addressed.

According to HUD's Fair Housing Enforcement and Outreach (FHEO) Inquiries by City data (found in the Fair Housing Enforcement and Outreach Capacity data layer on HCD's AFFH Data Viewer), Laguna Woods had 0.24 inquiries per 1,000 people between 2013 and 2021. This ratio is slightly higher than the adjacent cities of Laguna Beach (0.17), and Laguna Hills (0.16), but lower than the cities of Irvine (0.28) and Aliso Viejo (0.37). Of the four complaints during this period, two were found to have no valid basis or issue and two were not resolved due to a failure to respond. None of the complaints appear to be associated with discrimination due to disability, race, familial status, national origin, religion, sex, or color.

1.4.1.2 Patterns of Segregation and Minority Concentrations

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. According to the California Fair Housing Task Force Opportunity Maps, none of the census tracts within Laguna Woods are designated as areas with high segregation and poverty.

According to HUD, the definition of a racially/ethnically concentrated area of poverty (R/ECAP) involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold states that R/ECAPs must have a non-white population of 50 percent or more, and the poverty threshold states that a neighborhood can be identified as a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average poverty rate for the various census tracts in the metropolitan/micropolitan area, whichever threshold is lower.

As Table F in Exhibit C depicts, Laguna Woods does not include any neighborhoods that meet the poverty test because the percentage of residents living below the federal poverty threshold is 15.7

percent or lower in each of Laguna Woods' census tracts. Table Y provides data regarding race, ethnicity, and median household income in Orange County, Laguna Woods, and each of the eight census tracts that are partially or entirely within Laguna Woods.

Table Y: Racial/Ethnic Concentrations and Income Levels

<u>Jurisdiction</u>	<u>White¹</u>	<u>Black or African American¹</u>	<u>American Indian and Alaska Native¹</u>	<u>Asian¹</u>	<u>Native Hawaiian and Pacific Islander¹</u>	<u>Some other Race¹</u>	<u>Hispanic or Latino (of any race)¹</u>	<u>Median Household Income²</u>
<u>Orange County</u>	<u>64.5%</u>	<u>2.4%</u>	<u>1.1%</u>	<u>22.8%</u>	<u>0.7%</u>	<u>12.8%</u>	<u>34.1%</u>	<u>\$90,234</u>
<u>Laguna Woods</u>	<u>77.4%</u>	<u>0.7%</u>	<u>0.5%</u>	<u>20.6%</u>	<u>0.1%</u>	<u>2.0%</u>	<u>5.8%</u>	<u>\$44,020</u>
<u>Census Tract 626.21</u>	<u>66.7%</u>	<u>3.1%</u>	<u>0.3%</u>	<u>33.3%</u>	<u>0.0%</u>	<u>2.2%</u>	<u>12.6%</u>	<u>\$111,425</u>
<u>Census Tract 626.22</u>	<u>79.0%</u>	<u>0.4%</u>	<u>0.0%</u>	<u>20.0%</u>	<u>0.4%</u>	<u>1.6%</u>	<u>7.9%</u>	<u>\$44,119</u>
<u>Census Tract 626.25</u>	<u>67.4%</u>	<u>1.1%</u>	<u>0.3%</u>	<u>16.4%</u>	<u>0.5%</u>	<u>19.2%</u>	<u>32.5%</u>	<u>\$45,214</u>
<u>Census Tract 626.41</u>	<u>68.1%</u>	<u>1.7%</u>	<u>2.6%</u>	<u>20.7%</u>	<u>0.0%</u>	<u>12.1%</u>	<u>22.0%</u>	<u>\$88,986</u>
<u>Census Tract 626.46</u>	<u>74.3%</u>	<u>2.9%</u>	<u>0.5%</u>	<u>20.1%</u>	<u>0.0%</u>	<u>3.6%</u>	<u>7.0%</u>	<u>\$41,875</u>
<u>Census Tract 626.47</u>	<u>67.7%</u>	<u>3.7%</u>	<u>0.3%</u>	<u>17.3%</u>	<u>0.0%</u>	<u>11.2%</u>	<u>21.8%</u>	<u>\$54,327</u>
<u>Census Tract 626.48</u>	<u>76.8%</u>	<u>0.0%</u>	<u>1.6%</u>	<u>20.4%</u>	<u>0.0%</u>	<u>3.1%</u>	<u>4.2%</u>	<u>\$45,000</u>
<u>Census Tract 626.49</u>	<u>81.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>18.9%</u>	<u>0.0%</u>	<u>1.7%</u>	<u>11.8%</u>	<u>\$60,254</u>

¹ American Community Survey, 2019 5-Year Estimates. Table DP05.

² American Community Survey, 2019 5-Year Estimates. Table S1901.

As Table Y indicates, the White population is the largest race/ethnic group in each of the census tracts in Laguna Woods. There is also a large Asian population that is uniformly present in each of Laguna Woods' eight census tracts, with a slightly larger percentage of Asians (33.3 percent) present in Census Tract 626.21. As shown in Table Y, the median household income in Census Tract 626.21 (\$111,425) is substantially higher than Laguna Woods overall. The only census tracts with slightly outlying ethnic compositions are Census Tracts 626.41 and 626.47, where 22.0 percent and 21.8 percent of the population is Hispanic or Latino (of any race), respectively. However, it should be noted that the median household income in these two census tracts is higher than Laguna Woods overall, suggesting that these areas are slightly more affluent than others. This information points to the absence of R/ECAPs in Laguna Woods.

1.4.1.3 Access to Opportunities

Table YZ shows the California Fair Housing Task Force Opportunity Map composite scores, domain scores, and categorization for all eight of the census tracts that are partially or entirely within Laguna Woods. The majority of the census tracts within Laguna Woods are categorized as Low Resource areas. There are three census tracts within Laguna Woods that are categorized as Moderate Resource areas (of these, two are "Rapidly Changing") and one census tract (Census Tract 626.49) is categorized as a High Resource area. Census Tract 626.49 is located in the westernmost

portion of Laguna Woods (west of Avenida Sosiega) adjacent to the Woods End Wilderness Preserve.

Table YZ: Opportunity Map Scores and Categorization (2020)

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final Category
626.21	0.74	0.516	0.38	0.029	Moderate Resource (Rapidly Changing)
626.22	0.005	0.542	0.203	-0.63	Low Resource
626.25	0.132	0.787	0.503	-0.064	Moderate Resource
626.41	0.598	0.821	0.442	0.144	Moderate Resource (Rapidly Changing)
626.46	0.021	0.799	0.291	-0.423	Low Resource
626.47	0.127	0.511	0.343	-0.335	Low Resource
626.48	0.002	0.925	0.388	-0.439	Low Resource
626.49	0.34	0.882	0.7	0.283	High Resource

Source: California Fair Housing Task Force, TCAC/HCD Opportunity Maps, 2020 Statewide Summary Table.

Access to high-quality public transportation can also be looked at as an indicator of access to opportunities. AllTransit is a database created by the Center for Neighborhood Technology to explore metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. AllTransit's overall evaluation was that Laguna Woods had a low combination of trips per week and number of accessible jobs, enabling few people to take transit to work. Specifically, while the vast majority of jobs within Laguna Woods are located within 0.5 mile of transit and Laguna Woods residents can access over 90,000 jobs within a 30-minute transit commute, the transit quality within Laguna Woods is low. There are only four transit routes within Laguna Woods, and none of them offer high-frequency service as defined by AllTransit, making commuting by means of public transportation difficult.

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution, called the California Communities Environmental Health Screening Tool (CalEnviroScreen). High-scoring communities tend to be more burdened by pollution from multiple sources and most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status. Scores for census tracts within Laguna Woods are listed in Table ZAA. Scores for Laguna Woods range between 4.81 and 28.08, which are relatively low. The highest-scoring area within Laguna Woods is the census tract on the southeast side of Laguna Woods near Interstate 5 (Census Tract 626.47).

Table ZAA: CalEnviroScreen Scores by Census Tract (2020)

Census Tract	CalEnviroScreen Score	CalEnviroScreen Percentile
626.21	6.37	21
626.22	15.18	37
626.25	12.47	37
626.41	4.81	18
626.46	18.9	44
626.47	28.08	54

626.48	10.56	32
626.49	6.30	22

Source: CA Office of Environmental Health Hazard Assessment (OEHHA), CalEnviroScreen 4.0 Draft.

1.5 REGIONAL HOUSING NEEDS

State law requires all regional councils of governments to determine the existing and projected housing need for its region and determine the portion allocated to each jurisdiction. This is known as the RHNA process. State Housing Element law requires that each city and county develop local housing programs to meet its “fair share” of existing and future housing needs for all income groups, as determined by the jurisdiction’s Council of Governments. This fair-share allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs not only of its resident population but also for the jurisdiction’s projected share of regional housing growth across all income categories. Regional growth needs are defined as the number of units that would have to be added in each jurisdiction to accommodate the forecasted number of households, as well as the number of units that would have to be added to compensate for anticipated demolitions and changes to achieve an “ideal” vacancy rate.

In the six-county Southern California region, which includes Laguna Woods, the agency responsible for assigning these regional housing needs to each jurisdiction is SCAG. The regional growth allocation process begins with the California Department of Finance’s projection of statewide housing demand for a 5-year planning period, which is then apportioned by HCD among each of the State’s official regions. SCAG has determined the projected housing need for its region for the 2021 to 2029 Housing Element cycle and has allocated this housing need to each jurisdiction by income category through the RHNA process. The RHNA represents the minimum number of housing units each community is required to provide “adequate sites” for through zoning, and is one of the primary threshold criteria necessary to achieve HCD certification of the Housing Element.

In allocating the region’s future housing needs to jurisdictions, SCAG is required to take the following factors into consideration:

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

As defined by the RHNA process, Laguna Woods’ new construction need for the 2021 to 2029 planning period has been established at 997 new units, distributed among the four income categories as shown in Table AA.AB. Of the 127 Very Low Income units included in the City’s RHNA, approximately 50 percent (or 63 units) should be made available to Extremely Low Income households. The City will continue to provide sites for a mix of single-family, multifamily and mixed-use housing, supported by a variety of programs to enhance affordability, to accommodate its RHNA

and contribute toward addressing the growing demand for housing in the Southern California region.

Table AAAB: Regional Housing Needs Assessment, 2021–2029

Income Level	Number of Units	Percent of Total RHNA
Very Low* (<50% of AMI)	127	12.7%
Low (50-80% of AMI)	136	13.6%
Moderate (80-120% of AMI)	192	19.3%
Above Moderate (>120% of AMI)	542	54.4%
Total	997	100%

* Based on current household income data presented in Table G, the City estimates that 63 (or approximately 50 percent) of the 127 units included in its Very Low Income allocation should be made available to Extremely Low Income households.

AMI = Annual Median Income

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EXHIBIT B

CONSTRAINTS ANALYSIS

CITY OF LAGUNA WOODS

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LSA

~~July~~ January 202~~2~~1

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CONSTRAINTS ANALYSIS

CITY OF LAGUNA WOODS

Submitted to:

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LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
ADA	Americans with Disabilities Act
ADU	accessory dwelling unit
CBC	California Building Code
CC	Community Commercial
CEQA	California Environmental Quality Act
CF-P	Community Facilities—Private
CF-PI	Community Facilities—Public/Institutional
CIP	Capital Improvement Program
City	City of Laguna Woods
CUP	Conditional Use Permit
ETWD	El Toro Water District
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
ft	foot/feet
HMDA	Home Mortgage Disclosure Act
Lanterman Act	Lanterman Developmental Disabilities Services Act
mi	mile(s)
OCTA	Orange County Transportation Authority
RC	Residential Community
RT	Residential Towers
SB	Senate Bill
sf	square foot/feet
SFHA	Special Flood Hazard Area
SRO	Single Room Occupancy
UWMP	Urban Water Management Plan
WRP	Water Recycling Plant

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1.0 HOUSING CONSTRAINTS

The City of Laguna Woods' (City) Housing Element seeks to ensure the provision of adequate housing to meet the existing and projected needs of all economic segments of the community. Many factors, including market mechanisms, government regulations and policies, and infrastructure and environmental constraints, can constrain the development, maintenance, and improvement of housing. This Constraints Analysis addresses the potential and actual governmental constraints upon the development, maintenance, or improvement of housing that may affect the supply and cost of housing in Laguna Woods, as required by Government Code Section 65583(a).¹

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¹ California Department of Housing and Community Development. 2021. Codes and Enforcement of Onsite/ Offsite Improvement Standards. Website: <https://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml> (accessed June 11, 2021).

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2.0 GOVERNMENTAL CONSTRAINTS

Actions or policies of governmental agencies, whether involved directly or indirectly in the housing market, can impact the ability of the development community to provide adequate housing to meet consumer demands. For example, the impact of federal monetary policies and the budgeting and funding policies of governmental agencies can either stimulate or depress various aspects of the housing industry. State and local government compliance, and the enactment of sanctions for noncompliance, with federal laws may also have an impact on the housing industry.

State and local government compliance with State laws can complicate the development of housing. Statutes such as the California Environmental Quality Act (CEQA) and rezoning and General Plan amendment procedures required by the Government Code can prolong the review and approval of development proposals by local governments. In many instances, compliance with such mandates includes time constraints that cannot be altered by local governments.

City policies can also impact the price and availability of housing. Land use controls, site improvement requirements, building codes, fees, and other local programs to improve the overall quality of housing may serve as constraints to housing development.

2.1 LAND USE CONTROLS

The City's General Plan and Zoning Code provide for a range of residential land use designations and zoning districts. The City's Zoning Map is included as Figure 1. Land use designations that allow for residential development are presented in Table A.

Table A: Residential Land Use Designations

General Plan Land Use Designation	Max. Density	Description
Low Density Residential	<10 du/ac	Includes all dwelling units equipped for independent living (i.e., kitchen, bathroom, and sleeping quarters). Facilities intended for transient living, such as hotels and motels and hospitals and skilled nursing units, are not typically included.
Medium Density Residential	10–12 du/ac	
High Density Residential	13–35 du/ac	
Residential Community	<10 du/ac or 10-12 du/ac depending on location	Encompasses nearly all of the Laguna Woods Village planned residential community with the exception of Rossmoor Towers. Integrates a mix of single-family detached, single-family attached, two family, and multi-family residential, with supporting country clubs, parks, community services, local-serving noncommercial services, and open spaces. Common areas are managed by private nonprofit community associations.

Source: Land Use Element (City of Laguna Woods 2017).

~~du/ac~~ = ~~acre(s)~~

~~du~~ = dwelling unit(s) per acre

max. = maximum

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Figure 1: Zoning Map

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2.2 RESIDENTIAL DEVELOPMENT STANDARDS

The City's Zoning Code contains development standards for each zoning district consistent with the land use designations of the General Plan. The Zoning Code establishes development standards for each zoning district to ensure quality development and reduce the potential for land use conflicts. Residential development standards are summarized in Table B.

Table B: Residential Development Standards

Development Standard	Residential Multifamily (RMF)	Residential Community (RC)	Residential Towers (RT)
Maximum Building Height (ft)	65	40	None
Minimum Building Site Area (sf)	7,200	None	None
Minimum Area per Unit (sf)	1,000 ¹	None ²	None ²
Minimum Setback (ft)			
Front Yard	20	None ³	None
Side Yard from ROW	5	None ³	None
Rear Yard from ROW	25	None ³	None
Side Yard not abutting ROW	5	None ³	None
Rear Yard not abutting ROW	25 ⁴	None ³	None
Distance between Principal Structures (ft)	10	None ³	None
Maximum Building Site Coverage	50%	50% ⁵	None ²

Source: Zoning Ordinance (City of Laguna Woods 2020).

- ¹ The minimum per dwelling unit is based on the net land area.
- ² There shall be no minimum lot size. The total number of residential units permitted within the planning unit shall not be exceeded, as was shown on the statistical analysis for the original planned community, as amended. The dwelling densities as categorized in the City's General Plan as low-density, medium-density, and high-density shall not be exceeded. The limitations contained within the General Plan shall take precedence over any discrepancies that may exist as compared to the statistical analysis for the planning units.
- ³ Required yards and distances between building structures are waived.
- ⁴ In computing the depth of a rear setback from any building where such setback opens on an alley, private street, or public park, one-half of the width of such alley, street, or park may be deemed to be a portion of the rear setback, except that under this provision, no rear setback shall be less than 15 ft.
- ⁵ The building site coverage shall not exceed 50 percent of the land area contained within each recorded tract, exclusive of dedicated ROW. Swimming pool coverage shall not be considered as building site coverage.

City = City of Laguna Woods

ft = foot/feet

ROW = right-of-way

sf = square foot/feet

The cumulative effect of the City's residential development standards does not constrain the expansion of housing opportunities. Density standards are consistent with the densities established for General Plan land use categories. The setback requirements provide minimal light and air for development, are typical in the region, and do not unreasonably constrain housing opportunities.

All residential uses are currently required to provide the number of parking spaces as outlined in Table C. Developers of affordable and senior housing who are eligible for a density bonus pursuant to Government Code Sections 65919 through 65918 are eligible to use parking standards established by State law. Density bonus provisions are discussed in more detail later in this section.

Table C: Residential Parking Requirements

Use	Parking Requirement
Attached or detached single-family dwellings	<ul style="list-style-type: none"> 2 covered parking spaces for each dwelling unit.
Two or more dwelling units on one building site.	<ul style="list-style-type: none"> Studio to 1-bedroom: 1.5 parking spaces for each dwelling unit 2-bedroom: 2 parking spaces for each dwelling unit 3-bedroom and up: 2.5 parking spaces for each dwelling unit plus 0.5 parking space for each bedroom in excess.
Multifamily dwelling units (five or more dwelling units)	<ul style="list-style-type: none"> Each dwelling unit shall be assigned at least one standard-size parking space. Additional unassigned parking spaces shall be provided using the following formula, which is based on the size of each unit: <ul style="list-style-type: none"> <700 sf: 0 701–800 sf: +0.17 801–900 sf: +0.34 901–1,000 sf: +0.50 1,001–1,100 sf: +0.67 1,101–1,200 sf: +0.84 1,201–1,300 sf: +1.0 1,301–1,400 sf: +1.18 1,401–1,500 sf: +1.34 >1,500 sf: +1.5 1 guest parking space per every 4 dwelling units, rounded up to the next nearest whole number, shall be provided.

Source: Zoning Code (City of Laguna Woods 2020).
sf = square ~~foot~~/feet

The City monitors its development standards and their impact on development. Periodically, the City will amend the Zoning Code to ensure that development standards respond to market trends. The City has adopted other provisions in the Zoning Code that facilitate a range of residential development types and encourage affordable housing, as discussed below.

2.2.1 Affordable Housing Density Bonus

Section 13.26.040 of the City's Zoning Code provides the details of the residential density bonus provision, which is intended to provide incentives for the production of housing for very low-income, lower-income, or senior households in accordance with California Government Code Sections 65915 and 65917. On September 16, 2020, the City amended its Density Bonus Ordinance to ensure compliance with the current State law in effect at that time. Assembly Bill (AB) 1763 made a number of changes to density bonus requirements for affordable projects. The bill requires a density bonus to be granted for projects that include 100 percent lower-income units, but allows up to 20 percent of total units in a project that qualifies for a density bonus to be for moderate-income households. Under the revised law, density bonus projects must be allowed four incentives or concessions, and for developments within 0.5 mile of a major transit stop, a height increase of up to three additional stories or 33 feet (ft). A density bonus of 80 percent is required for most projects, with no limitations on density placed on projects within 0.5 mile of a major transit stop. The bill also allows developers to request the elimination of minimum parking requirements for rental units affordable to lower-income families that are either supportive housing or special-needs housing, as defined. AB 2345, which was signed in September 2020, further incentivizes the production of affordable housing. The City Council adopted updated ~~Housing Element is expected to include a~~

~~program to amend the City's Zoning Code to ensure the affordable housing residential density bonus standards regulations conform to current State law in December 2021.~~

In 2008, the San Sebastian senior apartments were completed with 17 units affordable to low-income residents. The development utilized a density bonus, and, as a result, the affordable units are subject to deed restrictions, which will ensure continued affordability through October 16, 2054.

2.2.2 Small-Lot Development

The City has not established any zoning districts that are intended to specifically facilitate small-lot residential development; however, the City's Zoning Code does not require minimum lot sizes in the Residential Community (RC) and Residential Tower (RT) zoning districts.

2.2.3 Special-Purpose Zoning Districts

Special-purpose zoning districts permit design and development standards to be established that are tailor-made for planned project areas with unique attributes. The City's Zoning Code includes the RC zoning district, which provides for the development and preservation of planned unit developments with a mixture of single-family attached and detached homes and multifamily homes. Neighborhoods in the RC district are characterized by controlled physical access and specialized recreation facilities. Setbacks and other development standards are to be tailored specifically to each project by means of a precise development plan that is approved with the project.

2.3 PROVISION FOR A VARIETY OF HOUSING TYPES

State Housing Element law specifies that local governments must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of various types of housing for all economic segments of the population, including multifamily residential housing, factory-built housing, emergency shelters, transitional housing, and supportive housing. Table D summarizes the housing types permitted in each of the City's zoning districts.

2.3.1 Single-Family Housing

Single-family housing is permitted by right in the Residential Multifamily (RMF) and RC districts. As outlined in the City's Zoning Code, standard development in the RC district shall be predominantly of multiunit, multistoried structures and single-family, one-story structures in an arrangement of attached or detached dwellings and their accessory structures.

2.3.2 Multifamily Housing

Multifamily housing is permitted by right in the RMF, RC, and RT districts. The RMF zoning district is intended to provide for the development and preservation of high-density multifamily residential neighborhoods with a moderate amount of open space. Care is taken to ensure that uses approved in the RMF zoning district are compatible with surrounding residential neighborhoods. RMF-zoned properties are located in three areas of Laguna Woods off major roadways. The RC district was created to provide for the development and preservation of planned unit developments with a mixture of single-family attached and detached homes, as well as multifamily homes.

Table D: Housing Types Per Zoning Code

Land Use Types	Zoning District		
	Residential Multifamily (RMF)	Residential Community (RC)	Residential Towers (RT)
Accessory Building/Use	A	A	A
Accessory Dwelling Unit	P	P	P
Condominiums/Stock Cooperatives	U	U	U
Community Apartment Projects	U	U	U
Community Care Facilities (<6 persons)	P	P	P
Congregate Care Facility	U	U	U
Duplex	P	U	X
Dwelling, Multiple-Family	P	P	P
Dwelling, Single-Family	P	P	X
Emergency and Transitional Housing Shelters	X	X	X
Guesthouse	X	A	X
Junior Accessory Dwelling Unit	P	P	P
Mobile Home	P	P	X
Mobile Home Development	U	U	X
Planned Unit Development	U	U	U
Residential Tract Sales & Rentals	T/SE	T/SE	T/SE
Supportive Housing	P	P	P
Transitional Housing	P	P	P

Source: Zoning Code (City of Laguna Woods 2020).

A = Permitted only as an accessory to a Principal Use

P = Permitted as a Principal Use

T/SE = Permitted with an approved Temporary Use/Special Event permit

U = Permitted with an approved use permit

X = Prohibited

RC-zoned properties encompass most of the land within Laguna Woods, reflecting its planned community heritage. The RT district was established to provide for the development and preservation of high-rise multifamily structures. RT-zoned properties exist in one small area in the western portion of Laguna Woods. Additional development standards are applicable to multifamily housing with more than five dwelling units on site, including standards related to circulation, lighting, waste disposal, and infrastructure.

1. ~~Mixed Use~~

~~Mixed-use projects combine both nonresidential and residential uses on the same site. Mixed-use development can help reduce the effects of housing cost burden by increasing density and offering opportunities for reduced vehicular trips by walking, bicycling, or taking public transportation. Although the City's Zoning Code does not currently include any zoning districts that allow mixed-used development, the updated Housing Element is expected to include a program to amend the Zoning Code to include one or more mixed-use overlay zoning districts that would allow the development of commercial and residential uses on the same parcel.~~

2.3.3 Live/Work Units

The City's Zoning Code does not currently include any zoning districts that allow for live/work units.

2.3.4 Senior Housing

Section 13.06.010 of the City's Zoning Code defines senior citizen housing as "a residential development consisting of at least 35 dwelling units which is developed for, or substantially rehabilitated or renovated for, senior citizens." Additionally, California Civil Code Section 51.3 defines "senior citizen" as a person 62 years of age or older, or 55 years of age or older, in a senior citizen housing development, and "senior citizen development" as a residential development developed, substantially rehabilitated, or substantially renovated for senior citizens that has at least 35 dwelling units.

Section 13.26.030 of the City's Zoning Code, which provides details about housing incentive use permits for affordable or senior citizen housing, states that in any zoning district that permits residential uses, a housing incentive use permit application to permit more dwelling units than allowed by zoning, and/or establish special site development standards, may be approved for the purposes of facilitating affordable and/or senior citizen housing developments.

2.3.5 Manufactured Housing and Mobile Homes

Manufactured housing and mobile homes offer an affordable housing option for many low- and moderate-income households. Manufactured housing is permitted by right in all zoning districts that permit single-family dwelling units, as required by State law. Mobile homes are permitted in the RMF and RC districts, and mobile home parks are permitted in those same zoning districts with an approved use permit. Mobile home developments are subject to additional development standards not related to the use; instead, the standards relate to landscape screening and design. According to California Department of Finance estimates, there were no mobile homes in Laguna Woods as of January 2020.²

According to the National Manufactured Home Construction and Safety Act of 1974, a manufactured home built and certified after June 15, 1976 and constructed on a permanent foundation may be located in any residential zoning district where a conventional single-family detached dwelling is permitted subject to the same restrictions on density and to the same property development regulations. Manufactured homes are currently allowed in all residential zoning districts, subject to foundational regulations found in Government Code Section 65852.3. Manufactured housing is treated the same as single-family dwellings and is subject to the same property development standards and permitting process. The City's Zoning Code requires manufactured housing to be architecturally compatible (roofing overhangs, roofing materials, exterior siding, stucco, etc.) with single-family dwellings.

2.3.6 Accessory Dwelling Units

Per Government Code Section 65852.2, an "accessory dwelling unit" (ADU) is defined as "an attached or a detached residential dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence. It

² California Department of Finance. 2020. E-5 Population and Housing Unit Estimates. Website: <https://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/> (accessed June 11, 2021).

shall include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family or multifamily dwelling is or will be situated.” ADUs may be an alternative source of affordable housing for lower-income households and seniors.

The City has updated its Zoning Code to permit ADUs by right if they are contained within the space of a proposed or existing single-family dwelling or accessory structure, or existing multifamily dwelling. This update to the City’s Zoning Code was made to comply with State requirements, with Government Code Section 65852.2 used as a baseline for the amendments.

Recent State legislation, including AB 68, AB 587, AB 881, and Senate Bill (SB) 13, addresses standards and regulations for ADUs. The bills modified the fees, application process, and development standards for ADUs, with the goal of lowering barriers to ADU development and increasing overall numbers of ADUs. Key provisions include the following:

- Prohibiting standards related to lot coverage standards, lot size, floor area ratio (FAR), or open space that have the effect of limiting ADU development
- Allowing ADUs within or attached to attached garages, storage areas, or accessory structures
- Removing requirements to replace parking when a garage or carport is demolished to develop an ADU
- Prohibiting maximum sizes for ADUs that are less than 850 square feet (sf) (1,000 sf for units with two or more bedrooms)

The City last updated its Zoning Code with regard to ADUs in 2020 to address the requirements of AB 68, AB 587, AB 881, and SB 13.

2.3.7 Residential Care Facilities

The Lanterman Developmental Disabilities Services Act (Lanterman Act) is a State law that sets out the rights of persons with developmental disabilities. The Lanterman Act impacts local zoning ordinances by requiring the use of property for the care of six or fewer disabled persons to be classified as a residential use, permitted by right, under zoning provisions. More specifically, a state-authorized, certified, or licensed family care home, foster home, or a group home serving six or fewer disabled persons or dependent and neglected children on a 24-hour-a-day basis is considered a residential use that is to be permitted in all residential zoning districts. No local government can impose stricter zoning or building and safety standards on these homes. Due to the unique characteristics of larger (more than six persons) residential care facilities, most local governments require a discretionary use permit to ensure neighborhood compatibility in the siting of these facilities.

The City’s Zoning Code accommodates both large and small residential care facilities. The City facilitates and encourages the development of residential care facilities by treating licensed facilities that serve six or fewer persons as standard residential uses, consistent with State law. As such, community care facilities are permitted by right in all residential zoning districts. Additionally,

community care facilities serving seven to 12 persons, except for large family day care homes, are permitted in any district, planned community, or specific plan area zoned for residential use, subject to the issuance of a use permit. The use permit is intended to ensure that the development is consistent with applicable zoning. In a supportive housing development, housing can be coupled with social services such as job training, alcohol and drug abuse programs, and case management for populations in need of assistance, such as the homeless, those suffering from mental illness or substance abuse problems, and the elderly or medically frail. Because supportive housing is a residential use, it would be treated as such in the development process whether the supportive housing development consisted of single-family detached units or apartment buildings. Similar to other multifamily developments, the required use permit process is intended to establish appropriate and unique development standards for residential development in the RC and RT zoning districts, as the zoning regulations contain few standards. This allows for greater specificity in development standards.

Review of the California State Community Care Licensing Division inventory of community care facilities identifies two residential care facilities in Laguna Woods. These facilities are for individuals who require 24-hour supervision but who do not generally need medical care beyond routine health checks and medication monitoring. Las Palmas is a licensed residential care community with 184 rental units, and the Regency is a licensed residential care community that consists of 192 rental units and offers both independent and assisted living on a month-to-month basis. The Regency is the only residential community that, under unique circumstances, will accommodate individuals younger than 55 within its assisted living facility.

2.3.8 Single Room Occupancy

Single Room Occupancy (SRO) facilities are small, one-room units occupied by a single individual and may either have shared or private kitchen and bathroom facilities. SROs are rented on a monthly basis typically without rental deposit and can provide an entry point into the housing market for extremely low-income individuals, formerly homeless persons, and disabled persons.

The City has adopted provisions in its Zoning Code (Section 13.26.170) to accommodate and regulate the establishment of SRO uses. These provisions include the following requirements:

- In the absence of findings as set forth in alternatives to off-street parking requirements, provision of one-half parking space for each guest unit, plus one space for each employee
- Submittal of a management plan outlining management policies, operations, emergency procedures, a security program, rental procedures, maintenance plans, and staffing as part of the use permit application
- Provision of an on-site manager on a 24-hour basis
- Provision of a single manager's unit, which shall be designed as a complete residential unit and be a minimum of 225 sf in size.

SRO uses are permitted in any zoning district or specific plan area zoned for hotels, subject to the approval of a use permit. Furthermore, the City's Zoning Code states that SROs will be treated as nonresidential uses.

2.3.9 Emergency Shelters and Low Barrier Navigation Centers

An emergency shelter is a facility that provides shelter to homeless families and/or homeless individuals on a limited short-term basis. According to the 2019 Point-in-Time Count for Orange County,³ there were five unsheltered people living in homelessness in Laguna Woods. State law requires emergency shelters to be permitted by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. The City's Zoning Code was amended in 2011 to include regulations pursuant to State law for emergency and transitional housing.

The City's Zoning Code Section 13.23.010 was also amended in 2018 to permit emergency shelters in the Community Facilities – Public/Institutional (CF-P/I) and Community Facilities – Private (CF-P) zoning districts as a by-right use.

Table E provides the development standards that apply to the CF-P and CF-P/I zoning districts.

**Table E: Development Standards for the Community Facilities
Zoning Districts**

<u>Development Standard</u>	<u>CF-P</u>	<u>CF-P/I</u>
<u>Maximum Building Height (ft)</u>	<u>40</u>	<u>40</u>
<u>Minimum Building Site Area (sq ft)</u>	<u>—</u>	<u>—</u>
<u>Minimum Building Site Width (ft)</u>	<u>—</u>	<u>—</u>
<u>Minimum Perimeter Setback (ft)</u>		
<u>From Street ROW</u>	<u>20</u>	<u>20</u>
<u>From Alley</u>	<u>10</u>	<u>0</u>
<u>From Residential Districts</u>	<u>10</u>	<u>10</u>
<u>From Nonresidential Districts</u>	<u>0</u>	<u>0</u>
<u>Maximum FAR</u>	<u>0.3</u>	<u>0.3</u>
<u>Maximum Building Site Coverage</u>	<u>None</u>	<u>None</u>
<u>Parking</u>	<u>See Code Section 13.16.300-400</u>	
<u>Landscaping</u>	<u>See Code Section 13.16.250</u>	
<u>Screening</u>	<u>See Code Section 13.16.240</u>	
<u>Signs</u>	<u>See Code Section 13.16.410-530</u>	
<u>Waste Management/Hazardous Materials</u>	<u>See Code Section 13.20.200</u>	

Source: Laguna Woods Municipal Code Section 13.13.030.

FAR = floor area ratio

³ United to End Homelessness. Point-In Time Count. 2019. Website: <https://www.unitedtoendhomelessness.org/2019-point-in-time-count> (accessed April 29, 2021).

**Table E: Development Standards for the Community Facilities
Zoning Districts**

<u>Development Standard</u>	<u>CF-P</u>	<u>CF-P/I</u>
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ft = foot/feet

ROW = right-of-way

sq ft = square foot/feet

In addition to application of the CF-P/I and CF-P district development standards, pursuant to Government Code Section 65583, the City can also specify written, objective standards to regulate the following aspects of emergency shelters to enhance compatibility:

- 1. Location and Separation:** Emergency shelters shall be situated more than 300 ft from another emergency shelter.
- 2. Physical Characteristics:**
 - a. The maximum number of beds for emergency shelters shall be 20 unless a larger number is approved through a conditional use permit.
 - b. The maximum number of beds does not apply in situations of citywide or statewide designated disasters or catastrophic conditions as determined by the City Council or City Manager.
 - c. Emergency shelters shall have adequate private living space, shower and toilet facilities, and secure storage areas for its intended clients.
 - d. All on-site waiting and client intake areas shall be located in the interior of the emergency shelter and shall be of sufficient size to prevent any such activities from occurring in the exterior of the emergency shelter.

The CF-P/I and CF-P zoning districts have high access to public transit services. The Orange County Transportation Authority has two local routes, Routes 90 and 89, which provide regional access along the public streets located immediately adjacent to the CF-P/I and CF-P zoning districts.

The City provides adequate and accessible sidewalks, vehicular access, and bicycle access to the CF-P/I and CF-P zoning districts.

The CF-P/I and CF-P zoning districts are surrounded by residential, open space, and/or community commercial land uses, and are therefore not located in close proximity to any uses that would create hazardous conditions or conditions inappropriate for human habitability.

The City's Zoning Code requires the following conditions to be met for emergency shelters in order to ensure "adequate" private living space requirements.

- 1. Operational Standards.**

(1) If an emergency shelter includes a drug or alcohol abuse counseling component, appropriate state and/or federal licensing shall be required.

(2) Emergency shelters shall limit occupancy by each client to no more than 180 days in a 365-day period.

(3) Emergency shelters shall conduct all on-site waiting and client intake activities in the interior of the emergency shelter and prevent any such activities from occurring in the exterior of the emergency shelter.

(4) Emergency shelters shall provide on-site security during all hours of operation, including a minimum of one security guard licensed by the State of California for each 20 clients, unless alternate security arrangements are approved through a conditional use permit.

(5) Emergency shelters shall provide on-site management during all hours of operation, including a minimum of one supervisor per emergency shelter and a minimum of one additional attendant for each 20 clients, unless alternate on-site management arrangements are approved through a conditional use permit.

AB 139 requires that emergency shelters provide parking to accommodate all staff, "provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone." The City's Zoning Code does not contain unique parking standards for emergency shelters.

AB 101 requires cities to allow a Low Barrier Navigation Center development by right in areas zoned for mixed uses and nonresidential zoning districts permitting multifamily uses if it meets specified requirements. A "Low Barrier Navigation Center" is defined as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low Barrier Navigation Centers may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions. AB 101 also sets a timeline for jurisdictions to act on applications for Low Barrier Navigation Center developments. The requirements of this bill are effective through the end of 2026, at which point they are repealed.

2.3.10 Transitional Housing and Supportive Housing

Health and Safety Code Section 50675.2 defines "transitional housing" and "transitional housing development" as buildings configured as rental housing developments but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Residents of transitional housing are usually connected to supportive services designed to assist the homeless in achieving greater economic independence and a permanent, stable living situation. Transitional housing can take several forms, including group quarters with

beds, single-family homes, and multifamily apartments, and typically offers case management and support services to help return people to independent living (often in six months to two years).

Government Code Section 65582 defines supportive housing as housing with no limits on the length of stay that is occupied by a “target population” and links this population with the provision of housing and social services. “Target population” means persons with low incomes who have one or more disabilities, including mental illness, HIV/AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Act (Division 4.5 [commencing with Section 4500] of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (Government Code Sections 65582(f) and (g)).

State law requires transitional and supportive housing to be defined as a residential use and subject only to the same regulations as comparable residential uses. The City currently permits emergency shelters by right in the Community Facilities - Public/Institutional (CF-P/I) and Community Facilities - Private (CF-P) zoning districts with the intent to provide adequate development and operational standards for such uses to ensure that the appropriate housing and services for special needs populations are met.

AB 2162 requires supportive housing projects of 50 units or fewer to be permitted by right in zoning districts where multifamily and mixed-use developments are permitted, when the development meets certain conditions. The City may choose to allow larger supportive housing projects by right in those zoning districts. The bill also prohibits minimum parking requirements for supportive housing within 0.5 mile of a public transit stop.

2.3.11 ~~Farm~~-Employee Housing

The City has no land zoned for agriculture and does not contain any agricultural land uses. Further, the 2015–2019 American Community Survey estimates there are no residents who hold farming, fishing, or forestry occupations. Therefore, there is no need for ~~farm-worker~~farmworker housing.

Further, because the City has not adopted any ordinances relating to employee housing, it does not anticipate that any other facilities or employers would provide housing for their employees.

2.4 HOUSING FOR PERSONS WITH DISABILITIES

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling.

The City has conducted a review of zoning and building code requirements and permitting procedures to identify potential constraints for housing for persons with disabilities. The City’s policies and regulations regarding housing for persons with disabilities are described below.

2.4.1 Zoning and Land Use

Restrictive land use policies and zoning provisions can constrain the development of housing for persons with disabilities.

2.4.1.1 Definition of Family

Local governments may restrict access to housing for households failing to qualify as a “family” by the definition specified in the Zoning Code. Specifically, a restrictive definition of “family” that limits the number of and differentiates between related and unrelated individuals living together may illegally limit the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated.⁴

The City Section 13.06.010(de)(395) of the Zoning Code defines “family” to mean one as “One or more persons occupying one dwelling unit. The term “family” includes the occupants of community care facilities serving six or fewer persons that are permitted or licensed by the State. The term “family” does not include occupants of a fraternity, sorority, boardinghouse, ~~lodging house~~lodginghouse, club, or motel.” To accommodate disabled persons in public facilities, the City defers to the California Access Compliance Reference Manual from the Department of General Services, Division of the State Architect.

The Housing Element includes a program to amend the Zoning Code’s definition of “family” to resolve inconsistencies between the current definition and applicable state law.

2.4.1.2 Residential Care Facilities

Under the Lanterman Act, small licensed residential care facilities for six or fewer persons must be treated as regular residential uses and permitted by right in all residential zoning districts. The City permits small licensed residential care facilities in all residential zoning districts and does not have additional development standards for these facilities and is, therefore, in compliance with the Lanterman Act.

The Housing Element includes a program to amend the Zoning Code to remove the requirement for residential care facilities for seven to 12 persons to obtain a conditional use permit.

2.4.1.3 Parking Standards

Development in the City is required to meet parking standards for people with disabilities, as required by State law, including requirements for the number and design of disabled parking spaces.

⁴ California court cases (City of Santa Barbara v. Adamson, 1980 and City of Chula Vista v. Pagard, 1981, etc.) have ruled an ordinance as invalid if it defines a “family” as: (a) an individual; (b) two or more persons related by blood, marriage, or adoption; or (c) a group of not more than a specific number of unrelated persons as a single housekeeping unit. These cases have explained that defining a family in a manner that distinguishes between blood-related and non-blood related individuals does not serve any legitimate or useful objective or purpose recognized under the zoning and land use planning powers of a municipality, and therefore violates rights of privacy under the California Constitution.

2.4.1.4 Reasonable Accommodation

The Fair Housing Act requires that local governments provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal opportunity to housing. To create a process for making requests for reasonable accommodation to land use and zoning decisions and procedures regulating the siting, funding, development and use of housing for people with disabilities, the City has adopted a Reasonable Accommodations Ordinance in accordance with State law (Section 13.15.010 of the City's Zoning Code). The Reasonable Accommodations Ordinance provides for flexibility in the City's development standards to accommodate persons with disabilities.

The following findings are required to approve reasonable accommodation requests:

1. The requested accommodation is requested by or on the behalf of one or more individuals with a disability protected under the fair housing laws;
2. The requested accommodation is necessary to provide one or more individuals with a disability an equal opportunity to use and enjoy a dwelling;
3. The requested accommodation will not impose an undue financial or administrative burden on the city;
4. The requested accommodation will not result in a fundamental alteration in the nature of a city program or law, including but not limited to land use or zoning; and
5. The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health and safety of other individuals or substantial physical damage to the property of others.

2.4.2 Building Codes

The City enforces the California Building Code (CBC), including Chapters 11A (Housing Accessibility) and 11B (Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and Publicly Funded Housing), which regulate the access and adaptability of buildings to accommodate persons with disabilities. Furthermore, Government Code Section 12955.1 requires that 10 percent of the total dwelling units in multi-family buildings without elevators consisting of three or more rental units or four or more condominium units are subject to the following building standards for persons with disabilities:

- The primary entry to the dwelling unit shall be on an accessible route unless exempted by site impracticality tests.
- The public and common areas shall be readily accessible to and usable by persons with disabilities.
- All the doors designed to allow passage into and within all premises shall be sufficiently wide to allow passage by persons in wheelchairs.

- All premises within covered multifamily dwelling units shall contain the following features of adaptable design:
 - An accessible route into and through the covered dwelling unit.
 - Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations.
 - Reinforcements in bathroom walls to allow later installation of grab bars around the toilet, tub, shower stall, and shower seat, where those facilities are provided.
 - Useable kitchens and bathrooms so that an individual in a wheelchair can maneuver about the space.

Compliance with the CBC, Government Code, and federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building Division as a part of the building permit process. The City has not adopted any amendments to the CBC that diminish the ability to accommodate persons with disabilities.

2.4.3 Conclusion

The City has not adopted unique restrictions that constrain the development of housing for persons with disabilities nor has it adopted regulations inconsistent with applicable federal or State law. There are no City-initiated constraints on housing for persons with disabilities caused or controlled by the City. In addition, the City has adopted formalized criteria and processing procedures for reasonable accommodation applications within its Zoning Code.

2.5 SITE IMPROVEMENTS

Developers of single-family residential tracts in the City are required to install arterial and local streets; sewer and water lines; storm drainage; curbs, gutters, and sidewalks; street lighting; underground utilities; and landscaping in the public right-of-way within and adjacent to a tract, if such facilities do not already exist. In most cases, these facilities are dedicated to the City or other agencies that are responsible for ongoing maintenance. Requirements for site improvements are at a level necessary to meet the City's costs and are necessary to protect health, safety, and welfare.

The cost of required off-site improvements vary with the sales price of each dwelling unit depending on the nature of development (i.e., level of improvements required). The City may also impose development impact fees on future housing developments in order to recover costs of installing off-site improvements including upgrading the circulation system and other urban service systems to serve increased density. The developed portions of Laguna Woods have the majority of necessary infrastructure, such as streets, electrical and water facilities, already in place. However, due to the age of the existing infrastructure, many areas where infill housing development is expected to occur may require infrastructure improvements to ensure sufficient capacity at build-out.

The City's Zoning Code includes minimum street width standards. Private streets serving four or less parcels as access to a public street are required to provide for a minimum pavement width of 16 feet within a minimum 20 ft wide right-of-way. Private streets serving five parcels or more as access

to a public street are required to provide for a minimum pavement width of 28 ft within a minimum 40 ft wide right-of-way. Sidewalks are required to not be less than 6 ft in width. Streets in residential districts requiring a building site area of 15,000 sf or more and where no sidewalks are to be installed, are required to have a right-of-way that will provide a parkway width of at least 4 ~~feet~~ft.

2.6 DEVELOPMENT FEES

The City collects various fees from developers to cover the costs of processing permits, including fees for planning approvals, subdivision map act approvals, environmental review, public works and plan check services, and building permits, among others. In addition to these service fees associated with development processing, the City also charges several impact fees to offset the future impact of development on parks and traffic circulation.

Table ~~E~~F lists residential development processing fees, based off the fee schedule that is effective July 19, 2021. Prior to this update, the City's fees were last updated in 2020. There were no significant increases to planning/development and building fees.

Table ~~E~~F: Current Residential Development Processing Fees

Development Fees	Initial Deposit
Conditional Use Permit	\$4,000
Development Agreement	\$10,000
Environmental Impact Report	\$10,000
General Plan Amendment	\$10,000
Zoning Code Amendment	\$10,000
Initial Study/Negative Declaration/Mitigated Negative Declaration	\$5,000
Sign Program	\$2,500
Site Development Permit	\$4,000
Specific Plan	\$10,000
Variance	\$3,500
Zone Change	\$10,000

Sources: City of Laguna Woods (2021).

Note: Unless otherwise noted, all fees are the minimum fee for the service. The final fee is based on actual costs, which may exceed the minimum fee.

Table G provides a comparison of the City's fees with other cities in the region. As shown, the City's fees are generally comparable to other cities.

~~Table F provides a comparison of the City's fees with other cities in the region. As shown, fees for the cities of Laguna Woods, Laguna Niguel, and Lake Forest were generally within the same range.~~ **Table ~~F~~G: Comparison of Processing Fees**

Fee Type	Laguna Woods	Laguna Niguel	Laguna Hills	Lake Forest
Conditional Use Permit	\$4,000	\$3,800	\$8,148.07	\$2,400-5,000
Variance	\$3,500	\$3,800	\$6,293.38	\$5,000
Zone Change	\$10,000	\$5,000	\$10,522.43	\$10,000

Table F provides a comparison of the City's fees with other cities in the region. As shown, fees for the cities of Laguna Woods, Laguna Niguel, and Lake Forest were generally within the same range. Table FG: Comparison of Processing Fees

Fee Type	Laguna Woods	Laguna Niguel	Laguna Hills	Lake Forest
General Plan Amendment	\$10,000	\$5,000	\$7,547.86	\$10,000
Tentative Tract Map	Varies	<ul style="list-style-type: none"> ● Preliminary Screencheck: \$1,425 (Flat) ● Filing: \$2,925 + \$25/each lot (Deposit) ● Added Lots to Filed Map: \$36/each lot (Flat) ● Changed Map: \$370 (Flat) ● Appeal to City Council: \$585 (Flat) ● Amendment to Conditions: \$155 (Flat) ● Amend Approved Map: \$1,000 + \$36/each numbered lot (Deposit) 	\$9,182.99	\$10,000
Tentative Parcel Map	Varies	<ul style="list-style-type: none"> ● Preliminary Screencheck: \$980 (Flat) ● Filing: \$2,080 (Deposit) ● Appeal to City Council: \$235 (Flat) ● Amendment to Conditions: \$155 (Flat) ● Amend Approved Map: \$1,000 + \$36/each numbered lot (Deposit) 	\$9,182.99	\$7,500

Sources: City of Laguna Woods (2020); City of Laguna Niguel (2020); City of Laguna Hills (2020); City of Lake Forest (2020).

Note: The fees listed above are generally approximated base fees or deposits; if the cost of providing the service exceeds the base fee or deposit, the balance is collected from the applicant.

In general, fees can be a constraint on housing development and compromise affordability because the additional cost borne by developers contributes to overall increased housing unit cost. However, the City's fees are necessary to maintain adequate planning services and other public services and facilities.

As noted elsewhere in this Constraints Analysis, the City has not processed a residential development application since the San Sebastian Apartments in the mid-2000s. Since that date, the City has evaluated the adequacy and rationality of its fees, and made changes to recover its reasonable costs of providing services, as allowed by state law. While some building fees have increased as a result of this evaluation, others have been eliminated. For example, the City no longer collects parkland dedication (Quimby Act) fees nor library development fees on behalf of the Orange County Library District. In addition, the County of Orange intends to end the Moulton Parkway-Laguna Niguel Road Fee Program as early as June 30, 2022, thereby eliminating those fees. Therefore, there is a strong likelihood that current development fees for a similar residential project would actually be the same or lower than what was assessed for the San Sebastian Apartments project. Due to the City's current fee structure, this would particularly be true if several of the requisite building inspections were consolidated.

The City's development fees do not appear to represent a constraint on housing development.

2.7 LOCAL PROCESSING AND PERMIT PROCEDURES

Development review and permit processing procedures are necessary steps to ensure that residential construction proceeds in an orderly manner.

Table GH outlines the development review processing times and approval procedures for residential developments. Depending on the type of discretionary approval that is required, a one or two-level decision-making process may be required. The City's process is somewhat more streamlined than many other cities in that the City Council also serves as the Planning Commission.

Table GH: Typical Permit Processing Timelines

Action/Request	Processing Time	Comments
Environmental Impact Report	9-12 months	Processing and review time limits controlled through CEQA. Adopted by the City Council.
Initial Study/Mitigated Negative Declaration	6-9 months	Processing time can be extended if the project has a longer review and approval period. Adopted by the City Council.
General Plan Amendment	10-12 months	Government Code Section 65358 limits the number of times any element of the General Plan can be amended each calendar year. Requires a public hearing for the City Council.
Zone Change	8-12 months	Certain procedures and time limits established by Gov. Code Sections 65854-65857. Approved by the City Council.
Tentative Parcel Map	45-60 days	Approved by the City Council.
Tentative Tract Map	6-8 months	Approved by the City Council.
Variance	3-4 months	Approved by the City Council.
Conditional Use Permits	3-4 months	Approved by the City Council.

CEQA = California Environmental Quality Act

2.7.1 Conditional Use Permit

Conditional Use Permits (CUPs) are required for some multi-family development, senior housing projects, ~~mixed-use projects~~, and large residential care facilities, dependent upon the underlying zoning district. As shown in Table GH, the processing time for a CUP is typically 90 to 120 days.

The City's Zoning Code establishes the same required findings for the approval of all CUP applications, regardless of proposed use:

1. The proposed location of the conditional use is consistent with the requirements of the general plan and the zoning district in which the site is located;
2. The proposed location of the conditional use and the conditions under which it would be operated or maintained would not be detrimental to the public health, safety, or general welfare, nor would be materially injurious to properties or improvements in the vicinity; and
3. The proposed conditional use would comply with all applicable provisions of this zoning ordinance.

It should be noted that the City's CUP requirement only applies to condominiums and apartments in existing residential zones and would not apply to the "by-right" overlay zoning districts to be created through the Housing Element's rezoning program. Although the CUP requirement does not affect the City's housing supply, it could affect affordability but, again, not within the "by right" overlay zoning districts to be created through the Housing Element's rezoning program.

2.7.2 Conclusion

Although the City has not processed an application for a residential development project since the San Sebastian Apartments in the mid-2000s, it is committed to working closely with developers to approve residential projects in a timely manner and minimize any potential time constraints on development. For a typical project, the developer would meet with Planning Division staff to discuss the project and then would submit plans for a preliminary review. Plans would then be submitted to the Building Division for plan check and building permit issuance. Projects requiring a CUP would be evaluated based on the criteria listed above and reviewed by the City Council prior to plans being submitted for plan check. The City does offer concurrent processing of planning and building plans if so desired by the applicant. Throughout construction, the Building Division would perform inspections to monitor the progress of the project. This process is comparable to that of many cities in the region; therefore, processing times would be typical for the region.

2.8 BUILDING CODES

As required of all local governments in California, the City enforces the CBC. The CBC establishes construction standards necessary to protect public health, safety, and welfare and all new constructions and renovations must conform to the standards of the CBC.

Based on recommendations from the Orange County Fire Authority (OCFA), the City has adopted several amendments to the CBC, which revised the following chapters:

- Scope and administration;
- Definitions;
- General requirements;
- Emergency planning and preparedness;
- Fire service features;
- Fire protection and life safety systems;
- Construction requirements for existing buildings;
- Energy systems;
- Fruit and crop ripening;
- Fumigation and insecticidal fogging;
- Lumber yards and agro-industrial, solid biomass and woodworking facilities;
- Requirements for wildland-urban interface fire areas;
- Hazardous materials;
- Explosives and fireworks;
- Flammable and combustible liquids;
- Flammable gases and flammable cryogenic fluids;
- Referenced standards; and

- The various appendices.

More information on these changes can be found in the City's Municipal Code. Compliance with the CBC, and the City's locally adopted amendments to the CBC, should not significantly add to the cost of construction since the CBC is mandated to be enforced statewide and costs should be relatively uniform statewide. Costs associated with the CBC In addition, because the OCFA serves as a regional fire protection agency, the County of Orange and 22 other member cities have adopted substantially similar amendments, which means that the cost of complying with the City's amendments to the CBC is substantially similar to most of the other cities in Orange County. Costs associated with the CBC and any locally adopted amendments are necessary to protect the health safety and welfare of the citizens. Compliance ensures that all new or renovated buildings are structurally sound, have proper exiting, and are equipped with necessary fire protection features. In addition, the CBC mandates energy efficiency as well as provisions for access for persons with disabilities.

2.9 FEDERAL AND STATE REGULATIONS

Federal and State requirements may act as a barrier to the development or rehabilitation of housing, and affordable housing in particular. These include State prevailing wage requirements and environmental review requirements.

2.9.1 State Prevailing Wage Requirements

Labor Code Section 1720, which applies prevailing wage rates to public works of over \$1,000, defines public works to mean construction, alteration, installation, demolition, or repair work done under contract and paid for in whole or in part out of public funds. For example, public transfer of an asset for less than fair market value, such as a land write-down, would be construed to be paid for in part out of public funds and trigger prevailing wage requirements.

While the cost differential in prevailing and standard wages varies based on the skill level of the occupation, prevailing wages tend to add to the overall cost of development. In the case of affordable housing projects, prevailing wage requirements could effectively reduce the number of affordable units that can be achieved with public subsidies. However, State law does allow a number of exceptions for single-family homes and for projects intended to support affordable housing, such as the construction or expansion of emergency shelters or construction of some types of affordable housing units.

2.9.2 Environmental Protection

Federal and State regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, conditional use permits, etc.). Costs resulting from the environmental review process, such as costs related to the preparation of environmental analyses, increase the cost of housing and may be passed on to the consumer. Environmental review can also impact the processing time for project review due to mandated public review periods. However, the presence of these regulations helps preserve the environment and ensure environmental safety. Recent State laws have established exemptions from CEQA for infill and affordable housing projects. Due to the City's predominantly built-out nature, it is anticipated that the majority of proposed projects would be in-fill and likely exempt from environmental review as urban infill projects. -

2.9.3 State Transparency Requirements

AB 1483 requires the City to provide on its website a current schedule of fees, exactions, and affordability requirements imposed by the City applicable to a proposed housing development project, all zoning ordinances and development standards, and annual fee reports or annual financial reports, as specified. AB 1483 also requires the City to provide on its website an archive of impact fee nexus studies, cost of service studies, or equivalent, as specified.

The information provided on the City's website complies with AB 1483.

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3.0 MARKET CONSTRAINTS

3.1 AVAILABILITY OF FINANCING

The availability of financing in a community depends on a number of factors, including the type of lending institutions active in the community, lending practices, rates and fees charged, laws and regulations governing financial institutions, and equal access to those institutions.

Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. A total of 1,112 households applied for mortgage loans for homes in the seven census tracts that include residential areas in Laguna Woods in 2019 (Table HJ). Overall, 62 percent of these applications were approved, 15 percent were denied, and 23 percent were either withdrawn or closed for incompleteness. Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. Of the 453 applications for conventional purchase loans, 70 percent were approved. The approval rate for government-backed loans was slightly higher at 72 percent, while the approval rate for refinance applications was 58 percent. Home improvement loan applications had the lowest approval rating, with 37 percent of applications being approved and 44 percent being denied.

Table HJ: Disposition of Home Purchase and Improvement Loan Applications (2019)

Loan Type	Total Applications	Approved	Denied	Other
Government-Backed Purchase	39	72%	8%	20%
Conventional Purchase	453	70%	10%	20%
Refinance	545	58%	16%	26%
Home Improvement	75	37%	44%	19%
Total	1,112	62%	15%	23%

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act Data Publication. (2019).

Note: "Other" includes files closed for incompleteness and applications withdrawn. Data covers the seven census tracts that include residential areas in Laguna Woods (Census Tracts 626.22, 626.25, 626.41, 626.46, 626.47, 626.48, and 626.49).

3.2 FORECLOSURES

Foreclosure occurs when households fall behind on one or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current. If payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess (take over) the home. When this happens, the homeowners must move out of the property. If the home is worth less than the total amount owed on the mortgage loan, a deficiency judgment could be pursued. If that happens, the homeowner would lose their home and also would owe the home lender an additional amount.

Between 2000 and 2005, with low interest rates, "creative" financing (e.g., zero down, interest only, adjustable loans), and predatory lending practices (e.g., aggressive marketing, hidden fees, negative

amortization), many households purchased homes that were beyond their financial means. Under the false assumptions that refinancing to lower interest rates would always be an option and home prices would continue to rise at double-digit rates, many households were unprepared for the hikes in interest rates, expiration of short-term fixed rates, and decline in sales prices that set off in 2006. Suddenly faced with significantly inflated mortgage payments, and “upside-down” mortgage loans (that are larger than the worth of the homes), many had to resort to foreclosing their homes.

However, since the Great Recession, foreclosure rates have come down significantly. As of June 2021, there was only one home in Laguna Woods in some stage of foreclosure. The foreclosure rate was less than 0.01 percent for Laguna Woods as well as for Orange County as a whole.⁵

3.3 DEVELOPMENT COSTS

3.3.1 Land Availability and Cost

The availability and price of land represents a significant market constraint to housing production throughout most of Southern California. This constraint is particularly acute in communities, such as Laguna Woods, where there is very little residentially designated vacant land. In June 2021, based on a survey of online real estate listings, there were no vacant properties listed for sale within Laguna Woods. Due to limited land availability, most new residential development in Laguna Woods will involve redeveloping properties with existing uses, which tends to add to the cost of land.

Density bonuses are available for projects that include affordable housing. Developers of affordable housing may also be granted regulatory concessions or development incentives. Density bonuses, together with the incentives and/or concessions, result in a lower average cost of land per dwelling unit thereby making the provision of affordable housing more feasible.

3.3.2 Cost of Construction

The cost of labor and building materials has a significant impact on the overall cost of new housing and can, therefore, be a constraint to affordable housing development. According to the National Association of Home Builders Construction Cost Survey, construction costs (including labor and materials) account for over 55 percent of the sales price of a new single family home. The Construction Cost Survey found that the average construction cost for a single family home in 2017 was \$237,760. It should be noted that the Construction Cost Survey is a national survey and may not be completely representative of Laguna Woods or Orange County; however, it does illustrate that construction costs comprise a significant proportion of the ultimate sales price of residential development. While significant, construction costs are consistent throughout the region and therefore would not specifically constrain housing development in Laguna Woods when compared to other cities in the region.

A reduction in amenities and the quality of building materials (above a minimum acceptability for health, safety, and adequate performance) can result in lower development costs. As part of the City’s density bonus and inclusionary housing programs, the City allows affordable units to be

⁵ Realtytrac.com (accessed June 2021).

smaller in size (maintaining the same number of bedrooms), and could also consider allowing less costly features and interior finishes, provided all project units were comparable in construction quality and exterior design.

Another factor related to construction costs is the number of units built at one time. As that number increases, overall costs generally decrease as builders are able to take advantage of the benefits of economies of scale.

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4.0 INFRASTRUCTURE CONSTRAINTS

The availability of public infrastructure and services for residential development is another potential constraint to the development of housing. The majority of Laguna Woods is highly urbanized and built-out with most of the necessary infrastructure, streets, electrical lines, and water distribution already in place. This section provides an overview of potential utility service constraints.

4.1 WATER

Laguna Woods is served by the El Toro Water District (ETWD), a public water service agency. Water provided in the El Toro Water District is nearly entirely dependent on imported water. Imported water is transported via a blend of water from the Colorado River and the Sacramento Bay Delta via the State Water Project. Both sources of import water are transported from hundreds of miles through a series of tunnels, aqueducts and pipelines to reach Orange County, and are distributed by the Metropolitan Water District (MWD) of Southern California, the region's wholesale water provider. ETWD purchases this imported water from the MWD through the Municipal Water District of Orange County. ETWD has taken a leading role in improving local water supply reliability for south Orange County. Together with the Santa Margarita Water District and the Moulton Niguel Water District, ETWD maintains and operates a large covered drinking water reservoir with a capacity of 275 million gallons. In the event of an emergency or unplanned interruption of water service, the reservoir could provide a 14-day supply of water to ETWD customers.

According to ETWD's Draft 2020 Urban Water Management Plan (UWMP), water use within its service area was 7,167 acre-feet of potable water and 1,270 acre-feet of recycled water for landscape irrigation in 2019. A stable trend is expected because ETWD's service area is predominantly built-out and the rate of population growth is small (about 0.23 percent per year). Water conservation efforts also kept per capita water use down. The total service demand was expected to increase to 8,737 acre-feet by 2025 and projected to increase to 9,156 acre-feet by 2045. According to the UWMP, ETWD's system is expected to have the ability to supply 9,156 acre-feet of water in 2045, meeting the projected demands. ETWD's demand projections consider such factors as current and future demographics, future water use efficiency measures, and long-term weather variability, and specifically take into account the additional housing units that each of the cities within its service area must plan for as part of the RHNA requirements. Therefore, adequate water supply is available to accommodate the RHNA during the Housing Element planning period.

SB 1087 requires that water providers develop written policies that grant priority to proposed development that includes housing affordable to lower-income households. The legislation also prohibits water providers from denying or conditioning the approval of development that includes housing affordable to lower income households, unless specific written findings are made. The City will provide a copy of the adopted Housing Element to ETWD after adoption and will continue to coordinate with ETWD to ensure priority service provision to affordable housing developments.

4.2 WASTEWATER

Wastewater in Laguna Woods is collected, treated, and disposed of by ETWD's Wastewater Treatment Plant (WTP), which has a maximum capacity of 6 million gallons per day. In addition,

ETWD operates a Water Recycling Plant (WRP), which allows it to reuse much of its wastewater effluent as recycled water by applying a tertiary treatment process. The WTP and WRP serve portions of the cities of Laguna Hills, Mission Viejo, Aliso Viejo, Lake Forest and all of Laguna Woods. ETWD has been able to meet its water demands from a combination of water resources and technology that optimally promote use of water conservation practices, water importation and recycled water treatment and delivery. In 2012, ETWD began a Recycled Water Expansion Project to increase the treatment and delivery of recycled water through a new tertiary treatment facility. The tertiary treatment plant is designed to produce as much as 3.7 million gallons of recycled water per day with a peak hour pumping capacity of over 5,000 gallons per minute. The WRP expansion was designed with the ability to expand capacity up to the expected maximum amount of raw wastewater entering the plant. Simultaneously, ETWD built a new recycled water distribution system that includes 140,000 ft of recycled water pipelines beneath the roadways in portions of Laguna Woods and the northwest portion of Laguna Hills. Therefore, there are no constraints on the availability of wastewater disposal or treatment.

-SB 1087 mandates priority sewage collection and treatment service to housing developments providing units affordable to lower-income households. The City will provide a copy of the adopted Housing Element to ETWD after adoption. The City will continue to coordinate with ETWD to ensure priority service provision to affordable housing developments.

4.3 TRANSPORTATION INFRASTRUCTURE

In 1990, Orange County voters approved Measure M, the Revised Traffic Improvement and Growth Management Ordinance, which provides funding to Orange County for needed transportation improvements over a 20-year period through the imposition of a one-half cent retail transaction and use tax. In 2006, voters extended the tax through 2041 (Measure M2). Cities such as Laguna Woods can qualify for Measure M funds if they comply with the Countywide Growth Management Program component requirements and have an established policy framework for that program. As part of complying with the Countywide Growth Management Program component requirements, Laguna Woods implemented a development mitigation program that established a fee structure for requiring new development to pay its proportionate share funding of impacts to the regional roadway system.

In order to assist with the long-term development of funding for major capital improvement projects on public property, the City Council adopts a minimum 7-year Capital Improvement Program (CIP) on an annual basis. The CIP and the minimum 7-year period to which it applies is also a requirement for receiving funding from Measure M2.

In addition, the City is within the San Joaquin Hills Transportation Corridor (SJHTC) fee assessment area. The payment of development impact fees is required as a condition of approval of a final parcel or tract map or as a condition of issuing a building permit on any properties within the fee assessment area, as authorized by Government Code Section 66484.3. These development impact fees are collected for the purpose of repaying the indebtedness incurred to construct the San Joaquin Hills Transportation Corridor (State Route 73) that has already been built, as well as to pay the cost of future anticipated improvements and ongoing planning and environmental requirements.

Fees are collected on new residential dwellings and new non-residential square footage in areas identified as the area of benefit surrounding the corridor. While most of Laguna Woods is within Area of Benefit Zone A for the SJHTC, the northern portions of the City are within Area of Benefit Zone B. Table ~~U~~ provides a summary of the current (2021) development impact fees assessed within those areas. In 1997, the San Joaquin Hills Transportation Corridor Agency (SJHTCA) Board of Directors adopted a set rate of increase for the fees. Each July 1, rates for the SJHTCA increase by 2.667 percent.

**Table ~~U~~: San Joaquin Hills Transportation Corridor
Development Impact Fees (2021)**

	Zone A	Zone B
Single Family Residential	\$5,893/unit	\$4,567/unit
Multi-Family Residential	\$3,432/unit	\$2,664/unit

Source: Transportation Corridor Agencies (2021~~U~~).

Note: In 1997, the San Joaquin Hills Transportation Corridor Agency Board of Directors adopted a set rate of increase for the fees. Each July 1, rates increase by 2.667 percent.

While the traffic mitigation fees described above may present a constraint to housing development, they are necessary to facilitate the ongoing maintenance of transportation infrastructure.

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5.0 ENVIRONMENTAL CONSTRAINTS

A wide range of environmental factors may constrain the development of new housing. Areas of special environmental significance, potential safety hazards, and development constraints have influenced and will continue to influence land use policy. The City's Safety Element identifies areas subject to a number of environmental constraints, including flooding, seismic hazards, hazardous and toxic materials, and urban fires. The City's General Plan recognizes those hazards and identifies programs to minimize them.

5.1 FLOODING

The Federal Emergency Management Agency (FEMA) publishes maps that identify areas of the City subject to flooding in the event of a major storm. Those Flood Insurance Rate Maps (FIRMs) indicate areas that may be inundated in the event of a 100-year or a 500-year storm. In addition, the maps indicate the base flood elevations at selected intervals of the floodway. The flood map contained in the City's Safety Element indicates that very few areas are within 100-year flood event inundation areas. Areas are limited to the small reservoir southeast of the intersection of Moulton Parkway and Ridge Route Drive, the 9 Hole Par 3 Golf Course in Laguna Woods Village, and Aliso Creek in the southeastern portion of Laguna Woods. The projected 500-year flood would most significantly affect low-lying areas along Aliso Creek.

Additional flood hazards include the four reservoirs with a total maximum capacity of 10 million gallons of potable water distributed throughout Laguna Woods. Two of these reservoirs are located at a high point northwest of the intersection of El Toro Road and Moulton Parkway, and two are located in Laguna Woods Village (one at the south end of Calle Sonora Este and another on the west side of Bahia Blanca West). The dam/reservoir located southeast of the intersection of Moulton Parkway and Ridge Route Drive (Rossmoor #2) is located in a 100-year floodplain, but is not subject to State dam inundation mapping regulations. The Veeh Reservoir located nearby in the City of Laguna Hills is also within a 100-year floodplain. According to the City's Safety Element, failure of any of the previously mentioned ETWD infrastructure could cause localized flooding.

The Moulton Niguel Water District owns and operates a water tank in the City of Aliso Viejo just south of the intersection of El Toro Road and Aliso Creek Road. Failure of that water tank could cause flooding on El Toro Road and in the lower portions of Woods End Wilderness Preserve.

The failure of the bridge along Avenida Sevilla that crosses Aliso Creek could impede movement and cause localized flooding on property in Laguna Woods Village. Flood hazards in Laguna Woods pose a moderate risk. Areas designated for future residential development will be evaluated on an individual basis regarding their potential flood hazard.

5.2 SEISMIC AND GEOLOGIC HAZARDS

As stated in the City's Safety Element, the entirety of Laguna Woods—as well as all of Southern California—is located within a seismically active region that has been subject to major earthquakes in the past. There are no known faults in Laguna Woods. However, the Newport-Inglewood, Whittier-Elsinore, Glen Ivy Elsinore, and Temecula-Elsinore faults are located within close proximity

to Laguna Woods. The closest fault—Newport-Inglewood—traverses approximately 7-8 miles southwest of Laguna Woods. The San Andreas and San Jacinto faults are located much further away from Laguna Woods (the San Jacinto Fault crosses the region approximately 40 miles northeast of Laguna Woods and the San Andreas Fault is even farther away [approximately 50 miles northeast]). Although farther away, those faults have the potential to deliver larger magnitude earthquakes than the other five faults mentioned above. Other major faults may be buried under alluvium, or fault traces may have been obliterated due to natural weathering.

Liquefaction is another hazard associated with intense ground shaking, in which the soil can destabilize and if sufficient water is present in the soil, the soil and water can mix. The City's Safety Element includes a map that identifies liquefaction hazard zones. Most of the approximately 256 acres that are within the identified liquefaction hazard zones are in the southeastern portion of Laguna Woods; however, small areas that are subject to liquefaction hazards also exist in the northern and western part of Laguna Woods. Areas within these hazard zones may experience liquefaction during extreme ground shaking.

Landslides, which can occur as a result of seismic activity or as an independent event, have the potential to cause loss of life, personal injury, economic loss, and property damage in Laguna Woods. The City's Safety Element includes a map that shows the locations of the approximately 77 acres that are prone to earthquake-induced landslides. Most of the areas that are subject to landslides are in the western half of Laguna Woods.

5.3 WILDFIRES

According to the City's Safety Element, wildfires in the open space and wildland-urban interface area that borders the westernmost edge of Laguna Woods could cause loss of life, personal injury, and extensive property damage, including damage to open space resources. Consequently, fires are considered to pose a very significant risk. In 2012, the City Council designated three fire hazard severity zones (very high, high, and moderate) within the wildland-urban interface area shown in the Safety Element. The Very High Fire Hazard Severity Zone was identified by the California Department of Forestry and Fire Protection (CAL FIRE), while the High and Moderate Fire Hazard Severity Zones were identified by OCFA based on an assessment of vegetation, slope, fire history, weather patterns, and impact of flames, heat, and flying embers. Collectively, those zones and the 2,564 residential dwelling units within them face the highest risk of wildfire impacts. However, OCFA has developed a number of resources that are intended to mitigate fire risk through vegetation management, including technical guidelines for developing fuel modification plans for new construction projects and maintaining and managing vegetation on properties within fire hazard areas.

5.4 NOISE

Noise generated from mobile sources such as traffic on City streets and Interstate 5 (I-5) and aircraft flyovers will continue to have the greatest potential impact on the City's land use decisions. The City's Noise Element describes the existing noise environment using maps that identify several areas with high levels of noise. The Noise Element also identifies noise sources and contains goals and policies that will be useful in reducing the effects of noise, if not the actual intensity of noise. Land

use policy discourages the placement of noise-sensitive land uses in areas that are subject to high noise levels. The City requires new housing developments to provide an acoustic analysis and provide necessary mitigation, such as barriers or additional sound insulation, for projects located within the 65 CNEL noise contour zones identified in the Noise Element. According to the Noise Element, areas adjacent to the following road segments are either already within the 65 CNEL noise contour or are projected to be in future General Plan build-out:

- El Toro Road (Aliso Creek Road to Paseo de Valencia)
- Moulton Parkway (Gate 12 south to City limits)
- Santa Maria Avenue (Avenida Sosiega to Santa Vittoria Drive)

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EXHIBIT C

HOUSING SITES INVENTORY AND ANALYSIS

CITY OF LAGUNA WOODS

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LSA

~~July~~ January 2022~~1~~

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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).

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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.

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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)	Currently 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 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 at 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 Medical 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” 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 ~~evident~~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 community and are, therefore, not likely to vacate their current locations. Such businesses included grocery stores, banks, and pharmacies.

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).

The properties upon which Home Depot is located were also removed from further consideration, consistent with 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.

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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 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.

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 at 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 Medical 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 ~~five~~four potential overlay ~~zones~~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 <u>Medium</u> -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
Mixed-Use 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
Mixed-Use <u>Residential</u> Low Density	15–20 <u>8–10</u> du/ac	<ul style="list-style-type: none"> • <u>Appropriate for sites adjacent to existing single-story residential uses</u> • 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 ~~child-care~~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.

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).

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.

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

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).

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.

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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~~ethnic groups. If an area's entire population belongs to one race group and one ethnic group, then an area has zero diversity.~~ 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.

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~~Figure 4: Healthy Places Index~~

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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.

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~~Figure 5: Social Vulnerability Index~~

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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 — CONCLUDING ANALYSIS

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

<u>Jurisdiction</u>	<u>Population with Disability (%)³</u>	<u>Population Below Poverty (%)²</u>	<u>Median Household Income¹</u>	<u>Married-Couple Family⁴</u>	<u>Male Householder⁴</u>	<u>Female Householder⁴</u>	<u>Nonfamily Household⁴</u>
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.

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~~Figure 6: TCAC Opportunity Areas~~

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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 development capacity of the potential mixed-use sites (Sites 15 and 16) was adjusted to 55 percent based on regional development trends and the fact that, while mixed-use residential/commercial projects are now relatively common in surrounding jurisdictions, the concept is still relatively new to Laguna Woods.~~
- 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 ~~four~~three of the five sites that are currently developed with places of worship (Sites 10–~~13~~12) and Sites 9 and 17 was limited to 15–20 units per acre to reflect the fact that those sites are adjacent to existing 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 ~~FG~~ 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 ~~FG~~, the total future housing construction potential on the 17 sites, based on realistic capacities, is 1,175,196 units. This includes an excess, or overzoning, of 178,199 units, or ~~17.85~~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").

JANUARY 2022

HOUSING SITES INVENTORY AND ANALYSIS
LAGUNA WOODS, CALIFORNIA

Table FG: 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	1310	1411	0	5460	81	Yes	Yes	Yes
2	Pacific Hills Calvary Chapel Parking Lot	NV	0.696	Residential HD	30 to 50	52	52	0	2427	31	Yes	No	No
3	Rossmoor Electric	NV	1.232	Residential HD	30 to 50	95	106	0	3644	55	Yes	Yes	No
4	Saddleback Golf Cars	NV	1.235	Residential HD	30 to 50	95	106	0	3644	55	Yes	Yes	No
5	Laguna Woods Self Storage	NV	5.249	Residential HD	30 to 50	3976	4279	0	15581	236	Yes	No	Yes
6	Animal Hospital	NV	0.76	Residential HD	30 to 50	62	63	0	2229	34	Yes	No	Yes
7	PS Business Park (excludes Jack in the Box)	NV	2.867	Residential HD	30 to 50	2424	2326	0	8579	129	Yes	Yes	No
8	Smart Parke	NV	2.373	Residential HD	30 to 50	116	117	0	4150	63	Yes	Yes	No
9	McCormick & Son Mortuary	NV	1.411	Residential MD MLD	2015 to 3020	60	70	0	25	3825	Yes No	No	Yes
10	Lutheran Church of the Cross	NV	3.028	Residential LD MLD	15 to 20	0	0	4635	819	54	No	Yes	No
11	Geneva Presbyterian Church	NV	3.955	Residential LD MLD	15 to 20	0	0	6049	1122	71	No	Yes	No
12	Saint Nicholas Catholic Church	NV	4.596	Residential LD MLD	15 to 20	0	0	7061	1322	83	No	Yes	Yes
13	Temple Judea	NV	1.757	Residential LD	158 to 2010	0	0	260	515	3115	No	No	Yes
14	Laguna Country United Methodist Church	NV	3.899	Mixed-Use HDResidential MD	20 to 30	170	180	085	7020	105	Yes	Yes	Yes
15	Medical Building at in Town Centre	NV	2.69	Residential HD	30 to 50	1122	1123	0	4176	63121	Yes	Yes	Yes
16	Willow Tree Center East	NV	3.095	Mixed-Use Residential LD	158 to 2010	0	0	240	527	2927	No	No	Yes
17	Helm Medical Center	NV	0.65	Residential MD MLD	2015 to 3020	30	30	0	11	1711	Yes No	No	Yes
Subtotal (units on nonvacant sites only)/ 9293 % of Lower Income Units						13714 2	14615 2	226230	585591	1,094 115	-	-	-
Subtotal (including all sites)						15015 2	16016 3	226230	639651	1,175 196	907935	759817	717738
City's 2021–2029 RHNA Allocation						127	136	192	542	997			
Surplus/(Deficiency)						2325	2427	3438	97109	17819 9			



Table FG: 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				
Unmet Need (Only Deficiencies)						-	-	-	-	-			

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

ac = acre(s)

City = City of Laguna Woods

du/ac = dwelling units per acre

~~Mixed-Use HD = Mixed-Use High Density~~

~~Mixed-Use LD = Mixed-Use Low Density~~

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~~

~~Residential HD = Residential High Density~~
~~Residential LD = Residential Low Density~~
~~Residential MD = Residential Medium Density~~
~~RHNA = Regional Housing Needs Assessment~~
~~V = vacant~~

~~***JANUARY 2022~~

Table ~~FG~~ also indicates that the 17 sites have the capacity to accommodate at least ~~310~~312 lower-income units, which is ~~4749~~ units, or ~~17.87~~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 ~~226~~211 moderate-income units, which is ~~3419~~ units, or approximately ~~17.719.9~~ percent more than the 192 moderate income units included in the City's housing needs allocation. ~~Twelve~~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. ~~Ten~~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). ~~40~~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 ~~907~~315 lower-income units identified in Table ~~F, 27G, 22~~ units on Site 1 are viewed as realistic for development on vacant land, which represents approximately ~~38~~ 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

<u>Income Level</u>	<u>Number of Units</u>	<u>Rehabilitation</u>	<u>Conservation/Preservation¹</u>
<u>Very Low* (<50% of AMI)</u>	<u>127</u>	<u>5</u>	<u>N/A</u>
<u>Low (50–80% of AMI)</u>	<u>136</u>	<u>5</u>	<u>N/A</u>
<u>Moderate (80–120% of AMI)</u>	<u>192</u>	<u>5</u>	<u>N/A</u>
<u>Above Moderate (>120% of AMI)</u>	<u>542</u>	<u>5</u>	<u>N/A</u>
<u>Total</u>	<u>997</u>	<u>20</u>	<u>N/A</u>

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 D was not included in the
previous draft. All content is new.

EXHIBIT D

HOUSING ELEMENT PERFORMANCE ASSESSMENT

CITY OF LAGUNA WOODS

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LSA

January 2022

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EXHIBIT D

**HOUSING ELEMENT PERFORMANCE
ASSESSMENT**

CITY OF LAGUNA WOODS

Submitted to:

City of Laguna Woods
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Laguna Woods, California 92637

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Project No. LWD2101

LSA

January 2022

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1.0 PROGRESS IN IMPLEMENTATION

Pursuant to Government Code Section 65588, each local government shall review its housing element as frequently as appropriate to evaluate all of the following: (1) the appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal, (2) the effectiveness of the housing element in attainment of the community's housing goals and objectives, (3) the progress of the city, county, or city and county in implementation of the housing element, and (4) the effectiveness of goals, policies, and related actions to meet the community's special housing needs.

State law requires that each Housing Element include a review of the progress made toward achieving the affordable housing goals of the previous Housing Element, and of the effectiveness and appropriateness of those previously adopted objectives. These results should be quantified where possible, but may be qualitative where necessary.

The City of Laguna Wood's (City) last Housing Element was adopted in 2014, and set forth a series of implementation measures with related objectives and policies for the following issue areas: maintain and improve residential neighborhoods and support quality housing for all residents; promote and encourage the development of housing opportunities to accommodate current and projected housing need; encourage and facilitate the development of affordable housing for all economic segments of the community, especially extremely- and low-income residents; and facilitate housing, transportation, and physical accommodations to aid persons with disabilities. This section reviews the continued appropriateness of these programs, the effectiveness of the current 2014–2021 Housing Element, and the progress in its implementation since 2014.

Table A, below, summarizes the City's progress for each implementation measure identified in the current Housing Element.

Table A: Review of the City of Laguna Wood's General Plan 2014–2021 Housing Element

Housing Element	Implementation Status	Continue/Modify/Delete
Objective 1: Maintain and improve residential neighborhoods and support quality housing for all residents		
Policy 1.A: Work towards full implementation of the 2014–2021 Housing Element objectives, policies, and programs in the Housing element.		
Program 1.A.1: Provide a progress report on the 2014–2021 Housing Element programs and quantified objectives as part of the annual General Plan status reports to the State.	Ongoing: This is the City's normal practice. The City submitted annual progress reports to the Department of Housing and Community Development (HCD) each year during the 2014–2021 Housing Element period.	The City will <u>delete</u> the program and replace it with Program H-4.1.2.
Policy 1.B: Promote, encourage, and facilitate efforts to preserve the City's housing stock.		
Program 1.B.1: Continue to promote on-going building maintenance activities. To promote building maintenance, the City will: <ul style="list-style-type: none"> Identify available funds for building maintenance activities and energy efficiency upgrades. Disseminate public information on available housing programs, such as the energy efficient equipment retrofit program (CDBG) at public counters and the City's website. Assist property owners and property managers in their efforts to identify and mitigate housing maintenance issues. 	Ongoing: In 2010, the City obtained a California Energy Commission grant using federal funds to retrofit City Hall with dual-pane, low-E windows and energy efficient lighting and heating, ventilation, and air conditioning equipment. The project modeled energy efficiency retrofits to property owners and property managers. Through June 2017, the City offered a CDBG funded Residential Energy Efficiency Improvement Program. The City provides resources and assistance daily regarding housing maintenance at the building counter and via building inspections.	The City will <u>delete</u> the program and replace it with programs H-2.1.1, 2.2.1, and 2.2.3.
Objective 2: Promote and encourage the development of housing opportunities to accommodate current and projected housing need.		
Policy 2.A: Promote construction of units consistent with the new construction needs identified in the Regional Housing Needs Assessment (RHNA).		
Program 2.A.1: Work with property owners in the development of Specific Plans to guide the development of Urban Activities Center parcels to include residential development.	Abandoned: In 2017, after receiving an application from the property owner, the City amended the Land Use Element of the City's General Plan to delete the Urban Activities Center land use designation. All properties formerly designated as Urban Activities Center have been re-designated and rezoned.	The City will <u>delete</u> the program as the City has deleted the Urban Activities Center land use designation from the General Plan.
Program 2.A.2: Work with commercial property owners to establish residential/commercial mixed use development standards for the City's Commercial land use district.	Not yet Implemented: Sufficient housing opportunities to accommodate the City's 2014–2021 RHNA allocation exist without the establishment of mixed use development standards.	The City will <u>delete</u> the program and replace it with a new rezoning program. See Program H-1.1.1.

Table A: Review of the City of Laguna Wood's General Plan 2014–2021 Housing Element

Housing Element	Implementation Status	Continue/Modify/Delete
Policy 2.B: Mitigate governmental constraints to the accommodation of special needs residents.		
Program 2.B.1: Participate in the County of Orange Consolidated Plan program and in the Continuum of Care to provide housing for special needs populations, particularly extremely and very low income persons. Participation will include assigning a representative to participate in meetings and events sponsored by these programs. In addition, the Resource Guide for Orange County Homeless and other publications that support the program goals will be distributed from City Hall.	Ongoing: The City participated in the development of the County of Orange's Consolidated Plan for the years 2010 to 2015, and 2015 to 2019. In 2015, the City hosted one of the County of Orange's Consolidated Plan Community Workshops at City Hall. Various homeless resources, including County of Orange-produced resources, are available from City Hall.	The City will <u>delete</u> the program and replace it with other programs to address the needs of the specified populations.
Program 2.B.2: Revise the Laguna Woods Zoning Ordinance to identify zones that will allow the development of transitional housing [and] facilitate transitional housing and supportive housing developments that serve extremely and very low income households, consistent with Government Code Section 65583(c)(1). Because transitional and supportive housing can be configured in different ways – either as regular multi-family housing or as group quarters – the Zoning Ordinance amendment will ensure that transitional and supportive housing that function as a residential use will be treated as residential uses and only subject to those restrictions that apply to other residential uses of the same type in the same zone.	Implemented: Chapter 13.23 of the Laguna Woods Municipal Code, adopted in 2011. Laguna Woods Municipal Code amended in 2018, see Ordinance No. 18-05.	The City will <u>delete</u> the program and replace it with programs H-1.3.1, 1.3.2, and 1.3.3.
Program 2.B.3: Review and revise the Laguna Woods Zoning Ordinance 13.23 in regards to emergency homeless shelters to ensure compliance with Government Code Section 65583(a)(4).	Implemented: Chapter 13.23 of the Laguna Woods Municipal Code, adopted in 2011, was amended in 2018.	The City will <u>delete</u> the program and replace it with Program 1.5.1.
Objective 3: Encourage and facilitate the development of affordable housing for all economic segments of the community, especially extremely- and low-income residents.		
Policy 3.A: Recognize the City's leadership role in the maintenance, preservation, improvement, and development of affordable housing.		
Program 3.A.1: Encourage and facilitate the development of affordable housing by: <ul style="list-style-type: none"> Supporting non-profit organizations that address housing issues. Serving as an intermediary between non-profit organizations and interested residential developers. Assisting in application preparation and other efforts to secure funding sources for development of housing for extremely low-, very low-, low- and 	Ongoing: The City encourages the development of affordable housing as required by State law. Resources, information, and assistance for developers and other interested parties are available from City Hall. Seventeen (17) specifically designated affordable housing units are located in Laguna Woods. From 2014 to 2020, the City received no applications for any new housing development projects	The City will <u>delete</u> the program as the Housing Element includes various programs to assist in the development of affordable housing.

Table A: Review of the City of Laguna Wood's General Plan 2014–2021 Housing Element

Housing Element	Implementation Status	Continue/Modify/Delete
<p>moderate-income residents.</p> <ul style="list-style-type: none"> • Making available regional and local housing program information to residents, and assisting residents in contacting housing assistance organizations. • Inform interested developers about the range of housing allowed in areas outside of Laguna Woods Village, including housing for families. • Inform interested developers about the State density bonus program incentives available for development of affordable housing. 	(affordable as well as market rate housing developments).	
Program 3.A.2: Continue to encourage and facilitate the use of the City's density bonus provisions to provide affordable housing opportunities. Revise the density bonus provisions as necessary in the City's Municipal Code to be consistent with State density bonus law.	Ongoing: Section 13.26.040 of the Laguna Woods Municipal Code, adopted in 2013; Laguna Woods Municipal Code amended in 2018; see Ordinance No. 18-03 and amended in 2020; see Ordinance No. 20-02.	The City will <u>delete</u> the program as the City's residential density bonus standards are consistent with state law.
Program 3.A.3: Encourage residents to apply, when available, for the Section 8 rental assistance program (through County of Orange Housing Authority) for extremely and very low-income rental households. Inform local rental property owners and eligible residents of Section 8 assistance and Section 8 waitlist openings through flyers and the City's website. Provide technical assistance during the application process to interested residents. While the City endeavors to maintain the current level of assistance through the Section 8 (72 vouchers) program, the City has no jurisdiction over the funding and operation of the Section 8 voucher program.	Ongoing: The City receives information and application forms for Section 8 housing through the County of Orange and makes them available to residents from City Hall.	The City will <u>delete</u> the program as the City provides referrals to the OC Housing Authority as a normal business practice.
Program 3.A.4: Continue to use CDBG funds to fund projects that improve and maintain the quality of the City's housing stock and residential infrastructure. While the City endeavors to maintain the current level of assistance through the CDBG program, the City has no jurisdiction over the funding and operation of the CDBG program.	Ongoing: Through June 2017, the City offered a CDBG-funded Residential Energy Efficiency Improvement Program. Uncertainty surrounding the future availability of CDBG funds, as well as the impact of increasing compliance requirements and law enforcement costs on City resources, resulted in the end of the program. Staff continues to evaluate other potential, future uses of CDBG housing rehabilitation funds.	The City will <u>delete</u> the program. See programs H-2.1.1, 2.2.1, and 2.2.3.

Table A: Review of the City of Laguna Wood's General Plan 2014–2021 Housing Element

Housing Element	Implementation Status	Continue/Modify/Delete
Program 3.A.5: The City has received no complaints regarding any discriminatory actions and will continue to enforce all fair housing laws. The City Manager is responsible for addressing and/or referring fair housing complaints and questions to the Fair Housing Council of Orange and/or HUD. The City will provide information on fair housing rights and responsibilities, and seek to remedy known acts of discrimination within the community. The City will disseminate fair housing information at City Hall and throughout Laguna Woods in a variety of community places.	Ongoing: Fair housing assistance, resources, and information is available from City Hall, through the City's code enforcement operation, and upon request.	The City will <u>delete</u> the program and replace it with Priority Issue 3.
Program 3.A.6: Review city processes and procedures as they pertain to the establishment of new housing, including market rate and all forms of affordable housing to remove undue constraints which hinder the development of new housing opportunities.	Ongoing: City staff has identified no undue constraints which hinder the development of new housing opportunities.	The City will <u>delete</u> the program as the Housing Element includes various programs related to updating City processes and procedures.
Program 3.A.7: Research potential funding sources (grants, loans, and other funds) which can be used towards the planning and development of affordable housing.	Ongoing: City staff continues to explore sources of funding to assist with affordable housing development.	The City will <u>delete</u> the program as the Housing Element includes various programs to assist in the development of affordable housing.
Objective 4: Facilitate housing, transportation and physical accommodations to aid persons with disabilities.		
Policy 4.A: Maintain zoning/development standards that guide development of affordable housing near public transportation, and promote project designs that are accessible and accommodating to the disabled.		
Program 4.A.1: Partner with property owners to identify and accomplish the retrofit of dwelling units and common facilities for handicapped accessibility. The City will participate at board meetings of the housing mutuals and the Golden Rain Foundation, the principal property owner in the City, to encourage retrofitting.	Not yet Implemented: While City officials often meet with the representatives of major property owners, a mutual approach to promoting retrofitting within the community is yet to be developed.	The City will <u>delete</u> the program and replace it with programs H-2.2.1 and 2.2.3.

CDBG = Community Development Block Grant

City = City of Laguna Woods

HCD = California Department of Housing and Community Development

HUD = United States Department of Housing and Urban Development

2.0 EFFECTIVENESS OF THE ELEMENT/SPECIAL NEEDS POPULATIONS

The 2014–2021 Housing Element resulted in changes to the Laguna Woods Zoning Ordinance that resulted in compliance of emergency homeless shelters with State law, as well as identification of zones that allow the development of transitional housing and facilitation of transitional housing and supportive housing developments that serve extremely- and very-low income households in those zones. For the reasons set forth in Table A, the City was unable to complete certain programs included in the 2014–2021 Housing Element, such as the creation of the two new housing units set by the Regional Housing Needs Assessment (RHNA) for the 5th Housing Element Cycle; working with property owners in the development of Specific Plans to guide the development of Urban Activities Center parcels to include residential development; the establishment of residential/commercial mixed use development standards for the City's Commercial land use district; and the retrofit of dwelling units and common facilities for handicapped accessibility. Overall, the 2014–2021 Housing Element was effective in providing fair housing assistance, resources, and information to residents participating in the County of Orange Consolidated Program to provide housing for special needs populations, particularly extremely and very-low income persons, and continuing to maintain and improve residential neighborhoods.

Refer to Table A in the previous section for a discussion of whether the programs included in the 2014–2021 Housing Element should be continued, modified, or deleted based on their effectiveness. Table A also addresses various programs related to the housing needs of special needs populations (Programs 2.B.1, 2.B.2, 2.B.3, 3.A.1, and 4.A.1).

3.0 APPROPRIATENESS OF GOALS, OBJECTIVES, POLICIES, AND PROGRAMS

The 2014–2021 Housing Element established a comprehensive and firm basis for the City to move forward towards the achievement of the goals, policies, and programs in the document. As a result, Table A shows that many of the programs were achieved or implemented. Some major amendments included in the 2021–2029 Housing Element incorporate what has been learned from the results of the 2014–2021 Housing Element, including:

- Inclusion of a frequently asked questions (FAQs) section for the RHNA process to promote clarity and a common understanding of both the RHNA process and the City’s associated obligations.
- Inclusion of “goals” in addition to “policy objectives” to provide declarative statements that set forth the City’s approach to each of the priority issues.
- Objective 2 in the 2014–2021 Housing Element evolved into Policy Objective H-1.1 in the 2021–2029 Housing Element, which includes making sites available to accommodate current and projected housing needs for groups of all income levels in accordance with California Government Code Section 65583(c)(1). For implementation of Policy Objective H-1.1, the following program was added:
 - Rezone the 17 potential housing sites identified in the Housing Sites Inventory and Analysis to accommodate the City’s housing needs allocation.
- Objective 3 in the 2014–2021 Housing Element evolved into Policy Objective H-1.2 in the 2021–2029 Housing Element, which states that the City should assist in developing adequate housing to meeting the needs of extremely low, very low- low, and moderate-income households. For implementation of Policy Objective H-1.2, the following programs were added:
 - Prepare and maintain a webpage with information related to the 17 potential housing sites identified in the Housing Sites Inventory and Analysis, including a Geographic Information System (GIS) map layer with geospatial information.
 - 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.
 - 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 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.

- Adopt an ordinance waiving or reducing City building permit fees for 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.
 - Amend various, existing housing-related provisions of the Laguna Woods Municipal Code to promote regulatory clarity.
 - 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.
- Objective 4 in the 2014–2021 Housing Element evolved into Policy Objective H-1.3 in the 2021–2029 Housing Element, which effectively changes the wording to provide reasonable accommodations for housing that is not only designed for persons with disabilities, but also intended for occupancy by or with supportive services for persons with disabilities. For implementation of Policy Objective H-1.3, the following programs were added:
 - 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.
 - 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.
 - Continue to allow 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).
 - Amend various, existing housing-related provisions of the Laguna Woods Municipal Code to conform to state law.
- The creation of a new objective, Policy Objective H-1.4, which incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent for very low, low-, or moderate-income households.
- The creation of a new objective, Policy Objective H-1.5, which makes sites available to accommodate emergency housing needs for homeless persons and families.
- Objective 1 in the 2014–2021 Housing Element evolved into Policy Objective H-2.1, Policy Objective H-2.2, and Policy Objective H-2.3, which add promotion of accessible and accommodating housing options for persons with special needs and promotion of housing

conservation and revitalization. For implementation of Policy Objectives H-2.1, H-2.2, and H-2.3, the following programs were added:

- 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.
- Investigate potential incentives for property owners to extend existing affordability covenants beyond the planned expiration date. If feasible and economical, adopt such incentives.
- 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.
- 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.
- 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.
- 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.
- Program 3.A.5 in the 2014–2021 Housing Element was expanded to Goal H-3 in the 2021–2029 Housing Element, which involves the administration of housing and community development programs and activities in a manner to affirmatively further fair housing. Goal H-3 includes policy objectives and implementation programs relating to the following:
 - Enhancing housing mobility and protecting existing residents from displacement.
- The creation of a new goal, Goal H-4, with its own set of policy objectives, which calls for analysis related to Housing Element implementation. This includes annual monitoring of the newly adopted Housing Element and coordination of the implementation of the newly adopted Housing Element with water and sewer agencies.

This update to the Housing Element revises existing programs and includes new programs, where appropriate, to ensure that the document reflects the City's priorities and that updated

requirements of California State law are addressed. Refer to the General Plan for the goals, policies, and programs of this Housing Element.

DRAFT

4.0 ASSEMBLY BILL 1233 – SHORTFALL OF SITES FROM THE 5TH CYCLE PLANNING PERIOD

According to the annual progress reports (APRs) provided to the California Department of Housing and Community Development (HCD), the RHNA quantified the need for housing within the City to be two new housing units during the 5th Cycle planning period. However, no new housing units were built in the City, indicating a shortfall of new housing units triggering the provisions of Government Code Section 65584.09.

DRAFT

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).

DRAFT

2.0 SUMMARY OF EFFORTS

The Southern California Association of Governments (SCAG) approved the Final Sixth Cycle 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.

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 reported the results of its review to the City 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 of availability 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 IS/ND was also directly distributed to the following parties:

- 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 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 10 days prior to the date of the City Council's public hearing at which adoption of the General Plan Housing Element is considered.

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), 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.

<ADDITIONAL INFORMATION REGARDING COMMENTS RECEIVED DURING THE PUBLIC REVIEW PERIOD WILL BE INCLUDED IN THE FINAL DRAFT GENERAL PLAN HOUSING ELEMENT.>

2.8 PUBLIC MEETING #5

City Council Meeting TBD

<ADDITIONAL INFORMATION REGARDING PUBLIC MEETING #4-5 AND SUBSEQUENT PUBLIC MEETINGS WILL BE INCLUDED IN THE FINAL DRAFT GENERAL PLAN HOUSING ELEMENT.>

2.52.9 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.

~~<ADDITIONAL INFORMATION REGARDING OTHER MEETINGS WILL BE INCLUDED IN THE FINAL DRAFT GENERAL PLAN HOUSING ELEMENT.>~~ 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, Ron 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.

DRAFT

ITEM 7.1

Attachment E

Revisions for Proposed General Plan Housing Element posted February 4, 2022
(supplemental to the Revisions for Draft General Plan Housing Element
posted January 13, 2022)

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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.

INTRODUCTION/OVERVIEW (CONTINUED)

- “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.

City of Laguna Woods General Plan

HOUSING ELEMENT

~~January-February 2022-Draft~~



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

Submitted to:

City of Laguna Woods
24264 El Toro Road
Laguna Woods, California 92637

Prepared by:

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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.”

JANUARY-FEBRUARY 2022

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.

ITEM 7.1

Attachment F

Comment Letters Received During the January 2022 Public Review Period

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ITEM 7.1 - Exhibit A to Attachment F

From: [Kate VC](#)
To: [City Hall -- City of Laguna Woods](#); [Shari Horne](#); [Carol Moore](#); [Cynthia Conners](#); [Ed Tao](#); [Noel Hatch](#); [Chris Macon](#)
Cc: [Rona Henry](#); [Cesar Covarrubias](#); Marisa.Prasse@hcd.ca.gov; McDougall, Paul@HCD; HousingElements@hcd.ca.gov
Subject: Public Comment: Housing Element Update
Date: Friday, January 14, 2022 11:19:59 AM

January 14, 2022

Mayor Horne, Council Members Moore, Conners, Tao, Hatch, City Manager Chris Macon, and Rebecca M. Pennington

Re: Public Comment: Housing Element Update

Thank you for the opportunity to review and comment on the January 2022 Draft of the Housing Element. I sincerely appreciate the hard work in this draft that has responded to the HCD letter of September 20, 2021, together with the suggestions of residents and advocates. I noticed that the Laguna Woods HE is particularly readable for the public so congratulations - not easily done!

In my opinion the requests of the HCD have been met with this new draft. Some of the items I particularly appreciate are as follows:

- Addition of a very specific and honest review of the 5th Element.
- More robust discussion of Affirmatively Furthering Fair Housing and other aspects related to housing for those with special needs.
- A variety of legal updates addressing California law including ADU requirements which was handled this past December.
- Additional detail on site selection was included. I appreciated the table outlining surrounding buildings and land characteristics, amendments to units per site, parcel numbers, specific zoning changes and the required spreadsheet for HCD. I agree the sites are consistent with Fair Housing goals and provide substantial access to transportation and other basic living services. The thorough discussion of how sites were chosen seems to me sufficient. This is particularly difficult in our unique senior-oriented city.
- Rehabilitation comments were appreciated in view of the age of our housing stock.
- Thank you for considering bolstering the inclusionary zoning in Laguna Woods.
- Additional data was reported on the population characteristics of Laguna Woods and surrounding populations.
- I approve of the substantial list of programs and the dates assigned.
- I look forward to annual report discussions and continuing progress on goals.

While it is not directly relevant to the Housing Element, I would like to advise the City that the Laguna Woods Democratic Club has established a new committee for members who are immigrants to the United States. I attended the first meeting (although I am not an immigrant). This new group will be featured on Village TV and will support our city goals of Affirmatively Furthering Fair Housing. The community will be educated about the benefits of diversity and challenges of those who immigrate to the U.S. and establish homes in Orange County, CA.

Again, I congratulate the city staff and its consultant on a meaningful and robust document that will provide a roadmap for attention to affordable housing as we grow.

Sincerely,

Kate

Catherine "Kate" R. Van Camp

Cc: Welcoming Neighbors Home, Kennedy Commission, HCD

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ITEM 7.1 - Exhibit B to Attachment F

From: [Rona Henry](#)
To: [City Hall -- City of Laguna Woods](#); [Shari Horne](#); [Carol Moore](#); [Cynthia Conners](#); [Ed Tao](#); [Noel Hatch](#)
Cc: [Chris Macon](#); [Cesar Covarrubias](#); [Prasse, Marisa@HCD](#); [McDougall, Paul@HCD](#); [HousingElements@hcd.ca.gov](#); [Kent Doss](#); [Mildred Perez](#); [Cynthia Guerra](#); [Daisy Cruz](#); [Kate Van Camp](#)
Subject: With attachment....Public Comment: Housing Element Update
Date: Friday, January 14, 2022 5:22:15 PM
Attachments: [Laguna Woods HE Comment to City Council 2022-01-14 \(SUBMITTED\).pdf](#)

This time with attachment.

----- Forwarded message -----

From: Rona Henry [REDACTED]
Date: Fri, Jan 14, 2022 at 5:11 PM
Subject: Re: Public Comment: Housing Element Update
To: <cityhall@cityoflagunawoods.org>, Shari Horne <shorne@cityoflagunawoods.org>, <cmoore@cityoflagunawoods.org>, Cynthia Conners <cconners@cityoflagunawoods.org>, <etao@cityoflagunawoods.org>, <nhatch@cityoflagunawoods.org>
Cc: Chris Macon <CMacon@cityoflagunawoods.org>, Cesar Covarrubias <cesarc@kennedycommission.org>, Prasse, Marisa@HCD <Marisa.Prasse@hcd.ca.gov>, McDougall, Paul@HCD <Paul.McDougall@hcd.ca.gov>, <HousingElements@hcd.ca.gov>, Kent Doss <rev@tapestryuu.org>

Dear Mayor Moore, Mayor Pro Tem Connors and Councilmembers Hatch, Horne and Tao,

Attached please find our attached public comment regarding Laguna Woods recently [revised 6th Cycle housing element draft](#).

I send this on behalf of myself and Rev. Kent Doss, minister of Tapestry Unitarian Universalist Congregation.

Thank you - and have a great weekend!

Rona

--

Rona Henry
Chair, [Welcoming Neighbors Home Initiative](#)
Tapestry, a Unitarian Universalist Congregation
[REDACTED] [REDACTED]



January 14, 2022

Dear Mayor Moore, Mayor Pro Tem Connors and Councilmembers Hatch, Horne and Tao,

Welcoming Neighbors Home Initiative is a ministry of the Tapestry Unitarian Universalist Congregation. This initiative works to end homelessness and promote affordable housing. Many members of Tapestry's congregation, plus people who volunteer with the Welcoming Neighbors Home Initiative, live in Laguna Woods.

We have reviewed the [latest draft of Laguna Woods' 6th Cycle Housing Element](#).

- We think the city staff and consultant have done a good job of identifying sites to rezone for housing. We note that many of the sites have ongoing and thriving businesses – therefore proactive programs are needed to attract and ensure affordable housing.
- We are especially pleased with the programs related to Policy Objective H-1.2 that assist with the development of affordable housing – specifically Program H.1.2.2 that plans for a market study related to updating the city's inclusionary housing ordinance. We are interested seeing the policy updated to ensure that greater levels of affordability are included – particularly for the extremely low and very low income categories.
- We are also supportive of Program H.1.2.3 – related to adopting 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.
- We ask the city to include a program to implement a Congregational Overlay Zone.
 - This overlay would provide an opportunity for the development of affordable housing on religious sites while retaining the existing religious use. The overlay would provide 100% affordable units on congregational sites, with a focus on extremely-low-, very-low- and low-income categories.
 - We also ask that the city host a roundtable event with faith organizations located in Laguna Woods to explore the opportunities that exist for them to build

affordable housing on their properties. We could suggest some speakers that could discuss how this has been done in other cities.

We congratulate the city on the development of it's 6th Cycle Housing Element. We look forward to watching the implementation of the Programs listed in it.

Sincerely,

Rona Henry, Laguna Woods Resident
Chair, Welcoming Neighbors Home Initiative

Rev. Kent Doss, Minister
Tapestry, a Unitarian Universalist Congregation

Cc: Rebecca M. Pennington, Development Programs Analyst, City of Laguna Woods
Chris Macon, Laguna Woods City Manager
Cesar Covarrubias, Mildred Perez, Cynthia Guerra, Daisy Cruz - Kennedy Commission
Paul McDougall, Marisa Prasse - California State Housing and Community Development
Office
Catherine Van Camp, Welcoming Neighbors Home member, Laguna Hills Resident

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ITEM 7.1

Attachment G

Information Required to Complete HCD's Housing Element Sites Inventory Form
for the Proposed General Plan Housing Element

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**CITY OF LAGUNA WOODS
 INFORMATION REQUIRED TO COMPLETE
 THE HCD HOUSING ELEMENT SITES INVENTORY FORM
 FOR THE PROPOSED GENERAL PLAN HOUSING ELEMENT**

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #1	
Vacant lot near Town Centre	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	North of Moulton Parkway, east of signalized intersection at Ayres Hotel
5 Digit ZIP Code	92637
Assessor Parcel Number	616-012-29
Very Low-Income	10
Low-Income	11
Moderate-Income	0
Above Moderate-Income	60
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	1.8
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	81
Vacant/Nonvacant	Vacant
Description of Existing Uses	Vacant
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #2	
Parking lot for Pacific Hills Calvary Chapel	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24481 Moulton Parkway
5 Digit ZIP Code	92637
Assessor Parcel Number	621-131-38
Very Low-Income	2
Low-Income	2
Moderate-Income	0
Above Moderate-Income	27
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	0.696
Current General Plan Designation	Commercial
Current Zoning	Professional & Administrative Office
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	31
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Church parking lot
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	No
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	No

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #3	
Rossmoor Electric	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24351 Moulton Parkway
5 Digit ZIP Code	92637
Assessor Parcel Number	621-131-21
Very Low-Income	5
Low-Income	6
Moderate-Income	0
Above Moderate-Income	44
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	1.232
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	55
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Commercial businesses (Rossmoor Electric building; health and wellness)
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	No

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #4	
Saddleback Golf Cars	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	23252 Via Campo Verde
5 Digit ZIP Code	92637
Assessor Parcel Number	621-131-26
Very Low-Income	5
Low-Income	6
Moderate-Income	0
Above Moderate-Income	44
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	1.235
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	55
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Commercial business (Saddleback Golf Cars)
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	No

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #5	
Laguna Woods Self Storage	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24151 Moulton Parkway
5 Digit ZIP Code	92637
Assessor Parcel Number	616-012-19
Very Low-Income	76
Low-Income	79
Moderate-Income	0
Above Moderate-Income	81
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	5.249
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	236
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Commercial business (Self-storage)
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	No
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #6	
Animal Hospital	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24271 El Toro Road
5 Digit ZIP Code	92637
Assessor Parcel Number	616-012-03
Very Low-Income	2
Low-Income	3
Moderate-Income	0
Above Moderate-Income	29
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	0.76
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	34
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Commercial business (Animal hospital)
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	No
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

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Site #7	
PS Business Park (excludes Jack in the Box)	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	23572 Moulton Parkway
5 Digit ZIP Code	92637
Assessor Parcel Number	616-021-30
Very Low-Income	24
Low-Income	26
Moderate-Income	0
Above Moderate-Income	79
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	2.867
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	129
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Commercial businesses (Self-storage, retail, and food)
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	No

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #8	
Smart Parke	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24334 El Toro Road
5 Digit ZIP Code	92637
Assessor Parcel Number	621-211-09
Very Low-Income	6
Low-Income	7
Moderate-Income	0
Above Moderate-Income	50
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	2.373
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	63
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Pet boarding/day care
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	No

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #9	
McCormick & Son Mortuary	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	25002 Moulton Parkway
5 Digit ZIP Code	92637
Assessor Parcel Number	621-091-16
Very Low-Income	0
Low-Income	0
Moderate-Income	0
Above Moderate-Income	25
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	1.411
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential Medium Density Overlay
Minimum Density Allowed	15
Maximum Density Allowed	20
Total Capacity	25
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Commercial business (Mortuary)
Suitable for Lower Income Households (Density & Parcel Size)	No
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	No
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #10	
Lutheran Church of the Cross	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24231 El Toro Road
5 Digit ZIP Code	92637
Assessor Parcel Number	616-041-01
Very Low-Income	0
Low-Income	0
Moderate-Income	35
Above Moderate-Income	19
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	3.028
Current General Plan Designation	Community Facilities
Current Zoning	Community Facilities-Private
Proposed General Plan (GP) Designation	Community Facilities
Proposed Zoning	Residential Medium-Low Density Overlay
Minimum Density Allowed	15
Maximum Density Allowed	20
Total Capacity	54
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Lutheran Church of the Cross
Suitable for Lower Income Households (Density & Parcel Size)	No
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	No

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #11 (Parcel 1 of 2)	
Geneva Presbyterian Church	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24301 El Toro Road
5 Digit ZIP Code	92637
Assessor Parcel Number	616-191-05
Very Low-Income	0
Low-Income	0
Moderate-Income	6
Above Moderate-Income	3
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	0.5
Current General Plan Designation	Community Facilities
Current Zoning	Community Facilities-Private
Proposed General Plan (GP) Designation	Community Facilities
Proposed Zoning	Residential Medium-Low Density Overlay
Minimum Density Allowed	15
Maximum Density Allowed	20
Total Capacity	9
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Geneva Presbyterian Church
Suitable for Lower Income Households (Density & Parcel Size)	No
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	No

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Site #11 (Parcel 2 of 2)	
Geneva Presbyterian Church	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24301 El Toro Road
5 Digit ZIP Code	92637
Assessor Parcel Number	616-191-06
Very Low-Income	0
Low-Income	0
Moderate-Income	43
Above Moderate-Income	19
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	3.455
Current General Plan Designation	Community Facilities
Current Zoning	Community Facilities-Private
Proposed General Plan (GP) Designation	Community Facilities
Proposed Zoning	Residential Medium-Low Density Overlay
Minimum Density Allowed	15
Maximum Density Allowed	20
Total Capacity	62
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Geneva Presbyterian Church
Suitable for Lower Income Households (Density & Parcel Size)	No
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	No

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #12	
Saint Nicholas Catholic Church	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24252 El Toro Road
5 Digit ZIP Code	92637
Assessor Parcel Number	621-121-11
Very Low-Income	0
Low-Income	0
Moderate-Income	61
Above Moderate-Income	22
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	4.596
Current General Plan Designation	Community Facilities
Current Zoning	Community Facilities-Private
Proposed General Plan (GP) Designation	Community Facilities
Proposed Zoning	Residential Medium-Low Density Overlay
Minimum Density Allowed	15
Maximum Density Allowed	20
Total Capacity	83
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Saint Nicholas Catholic Church
Suitable for Lower Income Households (Density & Parcel Size)	No
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #13	
Temple Judea	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24512 Moulton Parkway
5 Digit ZIP Code	92637
Assessor Parcel Number	621-121-18
Very Low-Income	0
Low-Income	0
Moderate-Income	0
Above Moderate-Income	15
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	1.757
Current General Plan Designation	Community Facilities
Current Zoning	Community Facilities-Private
Proposed General Plan (GP) Designation	Community Facilities
Proposed Zoning	Residential Low Density Overlay
Minimum Density Allowed	8
Maximum Density Allowed	10
Total Capacity	15
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Temple Judea
Suitable for Lower Income Households (Density & Parcel Size)	No
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	No
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

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Site #14	
Laguna Country United Methodist Church	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24442 Moulton Parkway
5 Digit ZIP Code	92637
Assessor Parcel Number	621-121-23
Very Low-Income	0
Low-Income	0
Moderate-Income	85
Above Moderate-Income	20
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	3.899
Current General Plan Designation	Community Facilities
Current Zoning	Community Facilities-Private
Proposed General Plan (GP) Designation	Community Facilities
Proposed Zoning	Residential Medium Density Overlay
Minimum Density Allowed	20
Maximum Density Allowed	30
Total Capacity	105
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Laguna Country United Methodist Church
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #15	
Medical building in Town Centre	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24331 El Toro Road
5 Digit ZIP Code	92637
Assessor Parcel Number	616-012-24
Very Low-Income	22
Low-Income	23
Moderate-Income	0
Above Moderate-Income	76
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	2.69
Current General Plan Designation	Commercial
Current Zoning	Professional & Administrative Office
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential High Density Overlay
Minimum Density Allowed	30
Maximum Density Allowed	50
Total Capacity	121
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Offices (SCOS Orthopedics building; health and wellness)
Suitable for Lower Income Households (Density & Parcel Size)	Yes
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	Yes
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

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Site #16	
Willow Tree Center East (Olive Garden, Cart Mart, and South County Adult Day Services)	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24260 El Toro Road
5 Digit ZIP Code	92637
Assessor Parcel Number	621-121-30
Very Low-Income	0
Low-Income	0
Moderate-Income	0
Above Moderate-Income	27
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	3.095
Current General Plan Designation	Commercial
Current Zoning	Community Commercial
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential Low Density Overlay
Minimum Density Allowed	8
Maximum Density Allowed	10
Total Capacity	27
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Commercial businesses (retail and food), adult day services
Suitable for Lower Income Households (Density & Parcel Size)	No
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	No
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes

Please note that the “Very Low-Income,” “Low-Income,” “Moderate-Income,” and “Above Moderate-Income” fields are estimates only. Potential future housing construction could occur at any income level, subject to compliance with applicable development standards, including inclusionary housing requirements.

Site #17 Helm Center	
Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need	
Jurisdiction Name	Laguna Woods
Site Address/Intersection	24902 Moulton Parkway
5 Digit ZIP Code	92637
Assessor Parcel Number	621-091-15
Very Low-Income	0
Low-Income	0
Moderate-Income	0
Above Moderate-Income	11
Type of Shortfall	Shortfall of Sites
Parcel Size (Acres)	0.65
Current General Plan Designation	Commercial
Current Zoning	Professional & Administrative Office
Proposed General Plan (GP) Designation	Commercial
Proposed Zoning	Residential Medium-Low Density Overlay
Minimum Density Allowed	15
Maximum Density Allowed	20
Total Capacity	11
Vacant/Nonvacant	Non-Vacant
Description of Existing Uses	Offices (Helm Medical Center building; health and wellness)
Suitable for Lower Income Households (Density & Parcel Size)	No
Financially Feasible for Federal & State Funding (Lower Income Suitability + 50-150 Unit Project Size)	No
Consolidation Potential Due to Adjacency of Other Candidate Site(s)	Yes