



# Placentia Planning Commission Agenda

Regular Meeting  
March 8, 2022  
City Council Chambers  
401 E. Chapman Avenue, Placentia, CA 92870

## SPECIAL PROCEDURES NOTICE DURING COVID-19 EMERGENCY

On March 4, 2020, Governor Newsom proclaimed a State of Emergency as a result of the threat of the COVID-19 virus. On March 17, 2020, Governor Newsom issued Executive Order N-29-20, which temporarily suspends requirements of the Brown Act allowing Planning Commission Members to hold public meetings via teleconferencing and make public meetings accessible telephonically or otherwise electronically to all members of the public seeking to observe and to address the Planning Commission.

Given the health risks associated with COVID-19, please be advised that while the City Council Chambers are open to the public, some or all of the Placentia Planning Commission Members may attend this meeting via teleconference. Those locations are not listed on the agenda and are not accessible to the public. Seating in the Council Chambers will be limited.

### **How to Observe the Meeting**

To maximize public safety while maintaining transparency and public access in addition to being open to the public, all Planning Commission meetings are available to view live on AT&T U-verse (Channel 99), Spectrum (Channel 3), and online at [www.placentia.org/pctv](http://www.placentia.org/pctv).

### **Join Zoom Meeting**

<https://us02web.zoom.us/j/82472498384?pwd=NmppsK3hXeJvJvdHVuNUZpZnRGZEhvUT09>

Meeting ID: 824 7249 8384 Passcode: 193287

or dial +16699006833, 82472498384#

### **How to Submit Public Comment**

Members of the public may provide public comment in person in a safe and socially distanced manner. Comments may also be sent for Planning Commission consideration by email to Sylvia Minjares at [sminjares@placentia.org](mailto:sminjares@placentia.org). Please limit submitted comments to 200 words or less. Comments received before or during a Planning Commission meeting, until the close of the **Oral Communications** portion of the agenda, may not be read during the Planning Commission meeting but will be summarized in the public record, subject to the regular time limitations per speaker. Longer submittals will be included in the public record. If you are unable to provide your comments in writing, please contact the Development Services Department for assistance at (714) 993-8124.

### **Americans with Disabilities Act Accommodation**

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the City Clerk's Office at [cityclerk@placentia.org](mailto:cityclerk@placentia.org) or by calling (714) 993-8231. Notification 48 hours prior to the meeting will generally enable City Staff to make reasonable arrangements to ensure accessibility while maintaining public safety. (28 CFR 35.102.35.104 ADA Title II)

Until further notice the City will implement the guidelines of the California Department of Public Health in regards to social distancing.

The City of Placentia thanks you in advance for taking all precautions to prevent the spread of the COVID-19 virus. The City will return to normal Planning Commission meeting procedures as soon as the emergency has ended.



# Placentia Planning Commission Agenda

Regular Meeting

March 8, 2022

City Council Chambers

401 E. Chapman Avenue, Placentia, CA 92870

**Frank Perez**  
Vice Chair

**Brandon Evans**  
Commissioner

**Claudia Keller**  
Commissioner

**Dennis Lee**  
Commissioner

**Nick Polichetti**  
Commissioner

**Matthew Rocke**  
Commissioner

**City of Placentia**  
401 E Chapman Avenue  
Placentia, CA 92870

**Phone: (714) 993-8124**  
**Fax: (714) 528-4640**  
**Website: [www.placentia.org](http://www.placentia.org)**

### Procedures for Addressing the Commission

Any person who wishes to speak regarding an item on the agenda or on a subject within the Planning Commission's jurisdiction during the "Oral Communications" portion of the agenda should fill out a "Speaker Request Form" and give it to the Commission Secretary BEFORE that portion of the agenda is called. Testimony for Public Hearings will only be taken at the time of the hearing.

The Commission encourages free expression of all points of view. To allow all persons the opportunity to speak, please keep your remarks brief. If others have already expressed your position, you may simply indicate that you agree with a previous speaker. If appropriate, a spokesperson may present the views of an entire group. To encourage all views, the Commission discourages clapping, booing or shouts of approval or disagreement from the audience.

**PLEASE SILENCE CELL PHONES AND OTHER ELECTRONIC EQUIPMENT WHILE THE COMMISSION IS IN SESSION.**

### Special Accommodations

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the City Clerk's Office at (714) 993-8231. Notification 48 hours prior to the meeting will generally enable City staff to make reasonable arrangements to ensure accessibility.  
(28 CFR 35.102.35.104 ADA Title II)

Copies of all agenda materials are available for public review in the Office of the City Clerk, City Planning Division Counter, Placentia Library Reference Desk and the internet at [www.placentia.org](http://www.placentia.org) under the Planning Commission page. Persons who have questions concerning any agenda item may call the City Planning Division at (714) 993-8124 to make inquiry concerning the nature of the item described on the agenda.

In compliance California Government Code Section 54957.5, any writings or documents provided to a majority of the Planning Commission regarding any item on this agenda that are not exempt from disclosure under the Public Records Act will be made available for public inspection at the City Clerk's Office at City Hall, 401 East Chapman Avenue, Placentia, during normal business hours.

Study Sessions are open to the public and held in the City Council Chambers or City Hall Community Room.

**REGULAR MEETING**  
6:30 p.m. – City Council Chambers

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**CALL TO ORDER:**

**ROLL CALL:** Commissioner Evans  
Commissioner Keller  
Commissioner Lee  
Commissioner Polichetti  
Commissioner Rocke  
Vice Chair Perez

**PLEDGE OF ALLEGIANCE:**

**ORAL COMMUNICATIONS: (PLEASE SEE PAGE ONE FOR SPECIAL INSTRUCTIONS ON SUBMITTING PUBLIC COMMENT DURING THE COVID-19 CRISIS)**

At this time the public may address the Planning Commission concerning any agenda item, which is not a public hearing item, or on matters within the jurisdiction of the Planning Commission. There is a five (5) minute time limit for each individual addressing the Planning Commission.

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**CONSENT CALENDAR:**

1. **Planning Commission Meeting Minutes – January 11, 2022**  
**Recommended Actions:** Approve

**REGULAR AGENDA:** None

**PUBLIC HEARING:**

1. **Applicant:** City of Placentia

**Project Location:** Citywide

**CONTINUED PUBLIC HEARING REGARDING GENERAL PLAN AMENDMENT NO. GPA 2021-02, 2021-2029 HOUSING ELEMENT UPDATE (previously incorrectly referred to as GPA 2021-01)**

**Recommended Actions:** It is recommended that the Planning Commission take the following actions:

1. Open the public hearing concerning General Plan Amendment (GPA) 2021-02; and



**PLACENTIA PLANNING COMMISSION  
MINUTES OF THE REGULAR MEETING**

January 11, 2022

The regular meeting of the Placentia Planning Commission of January 11, 2022 was called to order at 6:33 p.m. in the City Council Chambers, 401 East Chapman Avenue, Placentia, by Vice Chair Perez.

**ROLL CALL:**

PRESENT: Commissioner Polichetti  
PRESENT (VIDEO CONFERENCE): Commissioners Evans, Keller, Lee, Perez,  
Rocke  
ABSENT: Schaefer

OTHERS PRESENT: Kathya Firlik, Assistant City Attorney  
Joseph M. Lambert, Director of Development Services  
Andrew Gonzales, Senior Planner  
Lesley Whittaker, Associate Planner  
Sylvia Minjares, Office Assistant  
John Douglas, City Consultant (Video Conference)

Vice Chair Perez excused Chair Schaefer for due cause.

**PLEDGE OF ALLEGIANCE:** Commissioner Lee

**ORAL COMMUNICATIONS:** None

**CONSENT CALENDAR:**

1. **Planning Commission Meeting Minutes – October 12, 2021**  
**Recommended Actions:** Approve

**Motion by Rocke, second by Polichetti carried on a (5-0-1-1) vote to approve the recommended actions.**

Ayes: Evans, Lee, Perez, Polichetti, Rocke  
Noes: None  
Absent: Schaefer  
Abstain: Keller

**REGULAR AGENDA:** None

**PUBLIC HEARING:**

1. **Applicant:** Paul Romero, dba Wolf Pack Sports Therapy  
**Project Location:** 620 N. Rose Drive, Suite 134

**Use Permit (UP) 2021-06:** A request to permit a massage therapy studio in an existing 105 square-foot unit (Suite 134) within the 6,148-square foot Phenix Salon, at a multi-tenant commercial shopping center located at 620 N. Rose Drive, within the SP-7 (Specific Plan 7) Zoning District.

**Recommended Actions:** It is recommended that the Planning Commission take the following actions:

1. Open the public hearing concerning Use Permit (UP) 2021-06; and
2. Receive the staff report and consider all public testimony and
3. Close the public hearing; and
4. Adopt Resolution PC-2022-01, a resolution of the Planning Commission of the City of Placentia, approving UP 2021-06 and making findings to permit the establishment and operation of a massage therapy studio in an 105 square-foot unit located inside the existing 6,148-square foot Phenix Salon Suites which is located in a multi-tenant commercial shopping center within the SP-7 (Specific Plan 7) Zoning District at 620 N. Rose Drive; and making findings that the project is categorically exempt pursuant to the California Environmental Quality Act (CEQA) set forth in Title 14 CCR § 15301 (Class 1 – Existing Facilities) and the City of Placentia Environmental Guidelines.

Vice Chair Perez opened the public hearing.

Associate Planner Lesley Whittaker presented the staff report and provided an overview of the proposed project to the Commission, noting that a correction had been made on the posted agenda, changing the suite number from 132 to the correct Suite 134.

Ms. Whittaker provided the proposed hours of operation, and surrounding uses. Ms. Whittaker also noted that there would not be any additional employees at the subject business.

Ms. Whittaker also provided a project site plan, floor plan, and zoning map of the site.

Ms. Whittaker answered the Commissioners' questions regarding job growth opportunities as part of this application and whether there were other massage therapists within the Phenix Salon.

Director of Development Services, Joseph Lambert, clarified for the Commissioners that the proposed business is consistent with the Economic Development Element relating to increased economic opportunities.

The Applicant, Paul Romero, dba Wolf Pack Sports Therapy, provided a brief overview of the proposed business operations, his experience, and his desire to assist individuals with the recovery process from muscular injuries.

In response to questions from Vice Chair Perez, the Applicant stated his understanding

and acceptance of the Conditions of Approval for the Use Permit.

No public comments were received for or against the proposed project.

Vice Chair Perez closed the public hearing.

**Motion by Evans, second by Keller carried on a (5-0-1-1) vote to approve the recommended actions.**

Ayes: Evans, Keller, Lee, Perez, Polichetti  
Noes: None  
Absent: Schaefer  
Abstain: Rocke

2. **Applicant:** City of Placentia  
**Project Location:** Citywide

**General Plan Amendment No. GPA 2021-01, 2021-2029 Housing Element Update**

**Recommended Actions:** It is recommended that the Planning Commission take the following actions:

1. Open the public hearing concerning General Plan Amendment (GPA) 2021-01; and
2. Receive the staff report and consider all public testimony; and
3. Provide direction to staff and recommendations to City Council regarding strategies for creating additional housing capacity to accommodate the RHNA over the next 8 years.
4. Continue the public hearing regarding General Plan Amendment No. GPA 2021-01 to March 8, 2022

Vice Chair Perez opened the public hearing.

Director of Development Services Joseph Lambert introduced the agenda item, noting that the public hearing is recommended to be continued to a date certain, after tonight's discussion.

John Douglas, the City's Consultant, provided a slide presentation covering the purpose of the meeting, the status of the Housing Element update, dates of previous public meetings, Regional Housing Needs Assessment (RHNA) allocation, and RHNA key points.

Mr. Lambert presented a slide presentation detailing four potential areas for rezoning to meet the current RHNA shortfall. Mr. Lambert provided maps and current zoning for the

Chapman Corridor, the area adjacent to Old Town Placentia, the expansion of the “TOD” Zone, and expansion of a higher density area adjacent to the Atwood Neighborhood.

Mr. Lambert and Mr. Douglas responded to the Commissioners’ questions and made clarifications regarding properties currently owned by the City that could potentially be rezoned, the definition of height overlay, whether the presented conceptual ideas would impact schools and fire stations, how rezoning would impact existing businesses, how residents would be addressed or notified regarding rezoning, unpermitted accessory dwelling units, displaced residents, and affordable housing in the “TOD” zone.

Vice Chair Perez excused Commissioner Keller to leave early for due cause.

The Commissioners provided their input and preference regarding the presented areas for potential rezoning, prioritizing a rezoning of 1. the Chapman Corridor, 2. Creating a higher density area adjacent to Old Town, 3. expansion of the TOD Zone. The Commission recommended that rezoning a portion of the Atwood neighborhood be omitted unless absolutely necessary to achieve a certified Housing Element.

No public comments were received on this item.

**Motion by Roche, second by Perez carried on a (5-0-2-0) vote to approve the recommended actions, including continuing the public hearing until March 8, 2022.**

Ayes: Evans, Lee, Perez, Polichetti, Roche  
Noes: None  
Absent: Keller, Schaefer  
Abstain: None

**OLD BUSINESS: None**

**NEW BUSINESS: None**

**DEVELOPMENT REPORT:**

Mr. Lambert provided updates regarding The Herald, JPI Development, Shea Homes, Brandywine Homes, Village Plaza Phase 2, the North Orange County Audi Dealership, and HQT Townhomes.

**DIRECTOR’S REPORT:**

Mr. Lambert announced that Chair Schaefer has submitted her official resignation from the Commission and that she will be honored at the January 18, 2022 Council Meeting.

**PLANNING COMMISSION REQUESTS:**

Commissioner Roche requested that a traffic plan be submitted if traffic becomes an issue once Clyde’s Hot Chicken opens for business at Village Plaza.

**ADJOURNMENT:**

Vice Chair Perez adjourned the Planning Commission Regular Meeting at 8:25 p.m. to the regular meeting of Tuesday, February 8, 2022 at 6:30 p.m. in the City Council Chambers at 401 East Chapman Avenue, Placentia, CA.

**Submitted by,**

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Joseph M. Lambert,  
Secretary to the Planning Commission



# Placentia Planning Commission

## AGENDA STAFF REPORT

TO: PLANNING COMMISSION

FROM: JOSEPH M. LAMBERT, DIRECTOR OF DEVELOPMENT SERVICES

DATE: MARCH 8, 2022

SUBJECT: **CONTINUED PUBLIC HEARING REGARDING GENERAL PLAN AMENDMENT NO. GPA 2021-02, 2021-2029 HOUSING ELEMENT UPDATE (previously incorrectly referred to as GPA 2021-01)**

### **RECOMMENDATION:**

It is recommended that the Planning Commission take the following actions:

1. Reopen the continued public hearing concerning General Plan Amendment No. GPA 2021-02; and
2. Receive the staff report, staff presentation, and consider all public testimony; and
3. Provide comments to staff regarding the draft Housing Element; and
4. Adopt Resolution PC 2022-02 (Attachment 1) recommending that City Council find that adoption of the Housing Element update is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Section 15061(b)(3) and recommending that City Council approve the 2021-2029 Housing Element.

### **BACKGROUND:**

Every 8 years, each city within the Southern California Association of Governments ("SCAG") region is required to prepare an update to the Housing Element of the City's General Plan. The current update is referred to as the "6<sup>th</sup> planning cycle" which spans the 2021-2029 period. The City commenced the 6<sup>th</sup> cycle Housing Element update effort last year, and the following public meetings have been conducted to review Housing Element requirements and issues in Placentia:

- June 8, 2021 Planning Commission meeting
- August 24, 2021 Public workshop
- September 14, 2021 Planning Commission meeting
- September 16, 2021 Public workshop
- September 21, 2021 City Council meeting
- October 12, 2021 Planning Commission meeting
- October 19, 2021 City Council meeting
- January 11, 2022 Planning Commission public hearing
- January 18, 2022 City Council public hearing
- March 8, 2022 Planning Commission public hearing

An important difference between the Housing Element and other elements of the General Plan is the extent of State oversight. Under California law, land use and development is generally within the authority of cities through the adoption of policies and regulations in General Plans and municipal codes. However, State law establishes many specific limitations and requirements on city land use authority with regard to housing.

The State legislature has also declared an adequate supply of housing to be a matter of statewide importance and has delegated authority to the California Department of Housing and Community Development (“HCD”) to review local government Housing Elements and issue opinions regarding their compliance with State law. Cities must submit Housing Elements to HCD for review both prior to and after final adoption by the City Council. A finding of Housing Element compliance by HCD is referred to as “certification” of the Housing Element. Certification is important to enhance cities’ eligibility for grant funds and also to support local land use authority. Recent amendments to State law allow HCD and the California Attorney General to file litigation against cities on the grounds of Housing Element non-compliance, and courts are also authorized to impose fines on non-compliant cities and order land use changes or limit the issuance of building permits.

On October 21, 2021 the City’s draft Housing Element was submitted to HCD for review, and on December 20, 2021 HCD issued its review letter (Attachment 3) finding that the draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law.

In January of this year the Planning Commission and City Council conducted public hearings to review HCD’s comments, receive public testimony, and discuss potential strategies to address HCD’s comments. The focus of those meetings was on identifying appropriate land use strategies for creating additional capacity for housing development to accommodate the City’s assigned share of regional housing need. Since then, staff have prepared a revised draft Housing Element (Attachment 2) incorporating Planning Commission comments and City Council direction.

The purpose of this public hearing is to provide the Planning Commission and community stakeholders an opportunity to review the revised draft Housing Element and identify any further revisions to address HCD’s comments. Additional background information and the staff reports for previous meetings are posted on the City’s Housing Element website at: <https://placentia.org/943/2021-2029-Housing-Element-Update>.

### **HCD COMMENTS AND PROPOSED RESPONSES**

All cities are receiving lengthy Housing Element comment letters from HCD, reflecting the high level of State concern related to the “housing crisis.” At this time, only 6 of the 197 jurisdictions in the SCAG region (3%) have received State Housing Element certification. No Orange County jurisdiction currently has a certified Housing Element.

The revised draft Housing Element shows changes to the draft that was submitted to HCD in ~~strikeout~~/underline format. In addition, a summary of HCD comments and the proposed revisions to the Housing Element addressing those comments is provided in Attachment 4.

Many of HCD’s comments required only clerical or technical revisions to the data and analysis in the Housing Element, while other comments involve more substantive policy issues. A new appendix has been added with extensive analysis of fair housing issues (Appendix D). Some of the most significant comments from HCD also involve how the City will accommodate future housing needs as assigned through the RHNA process. Because of the exceptionally high RHNA allocations in this Housing Element cycle, many Orange County cities including Placentia do not currently have sufficient land zoned for housing to fully accommodate the RHNA. As noted in previous meetings, Placentia’s 6<sup>th</sup> cycle RHNA allocation is 4,398 units compared to 492 units in the prior cycle. Under State law, if a city’s land use plans and zoning do not demonstrate adequate capacity to accommodate the RHNA, zoning must be amended to create additional capacity.

**LAND USE POLICY OPTIONS**

The revised draft Housing Element (see Table B-1, below) estimates that there is currently a shortfall of approximately 1,137 potential housing units as compared to the RHNA based upon current zoning. The Housing Element must identify land use strategies and potential sites that could be rezoned to bridge this shortfall.

**Table B-1: Residential Sites Summary**

Income Category	Very Low	Low	Moderate	Above Moderate	Total
Approved Projects (Table B-2)	-	252	-	774	1,026
Vacant Sites (Table B-3)	-	-	394	65	459
Underutilized Sites (Table B-4)	698	404	371	247	1,720
ADUs	14	24	17	1	56
<b>Total Capacity</b>	712	680	782	1,087	3,196
RHNA	1,243	680	782	1,693	4,398
<b>Surplus (Shortfall)</b>	(531)	-	-	(606)	(1,137)

Source: City of Placentia, 2021

A key policy question considered by the Planning Commission and City Council at previous meetings was the most appropriate land use strategies for increasing potential housing capacity. Based on that discussion, the draft Housing Element has been revised to include the following rezoning strategies:

Strategy	Description
1. TOD Zone Expansion	The TOD zoning district currently allows up to 95 units/acre in some subareas. This strategy would expand the boundaries of the TOD district.
2. Increase R3 density	The current R-3 maximum density is 25 units/acre. Under State law, a density of 30 units/acre is considered sufficient to accommodate lower-income housing. Increasing the allowable density from 25 to at least 30 units/acre would accomplish 2 things: 1) create additional housing capacity; and 2) allow R3 properties to accommodate lower-income housing for RHNA purposes.

In addition to identifying areas where additional housing could be accommodated through rezoning, State law requires the rezoning of those properties by October 15, 2021. General Plan and zoning amendments to implement the TOD expansion and the increased allowable R-3 density are relatively straightforward and staff believes they can be completed by October.

However, another zoning strategy discussed at previous meetings regarding the Chapman Avenue corridor would be much more complex and involve different standards and regulations for different areas within the corridor (e.g., allowable uses, densities, height limits, design criteria). Preparation of a specific plan or similar zoning document and CEQA analysis for this kind of project typically requires more than a year. Therefore, staff recommends that the Housing Element rezoning commitments focus on the TOD area and R-3 district at this time. Concurrent with HCD review of the revised Housing Element, staff will commence the preliminary planning studies needed to prepare a new specific plan for the Chapman Avenue corridor.

In addition to these land use amendments, the following Zoning Code amendments are necessary to address HCD comments and comply with changes in State law:

Emergency Shelters: Program 1.4 has been revised to include an amendment to emergency shelter parking requirements consistent with AB 139 (Government Code sec 65583(a)(4)(A)).

Employee housing: Program 1.4 has been revised to include a Code amendment consistent with current law regarding agricultural employee housing.

Permanent supportive housing: Program 1.4 has been revised to demonstrate consistency with Government Code section 65651 regarding supportive housing.

Off-street parking: Program 1.17 has been revised to include a Code amendment to reduce required parking for studio and 1-bedroom units in the R-3 district to 1 space in either a garage or a carport.

### **CEQA COMPLIANCE:**

Adoption of the Housing Element update would not approve any development project, zoning amendment, or any other physical change to the environment; therefore, it is covered by the “common sense” exemption (CEQA Guidelines Sec. 15061(b)(3)) which provides that CEQA applies only to projects that have the potential for causing a significant effect on the environment. Subsequent to adoption of the Housing Element, amendments to the Zoning Ordinance will be necessary in order to implement Housing Element programs, and appropriate CEQA analysis will be prepared in connection with those amendments.

### **NEXT STEPS:**

Staff recommends that the Planning Commission review the revised draft Housing Element, consider public comments, and adopt a resolution recommending City Council adoption of the revised Housing Element. A City Council public hearing on this item is tentatively scheduled for March 15. If approved by the City Council, the adopted Housing Element must be submitted to HCD for review.

Zoning amendments to implement Housing Element programs will be subject to additional public review, CEQA analysis, and public hearings conducted by the Planning Commission and City

Council. No land use or zoning amendments would be approved by the adoption of the Housing Element.

**Prepared and approved by:**



Joseph M. Lambert  
Director of Development Services

**Attachments:**

1. Draft Planning Commission Resolution PC 2022-02
2. Revised Draft 2021-2029 Housing Element (tracked changes)
3. HCD review letter dated December 20, 2021
4. Summary of HCD comments and proposed responses

## RESOLUTION NO. PC-2022-02

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF PLACENTIA, CALIFORNIA RECOMMENDING THAT THE CITY COUNCIL FIND THAT ADOPTION OF THE HOUSING ELEMENT UPDATE IS EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CEQA SECTION 15061(B)(3) AND RECOMMENDING THAT THE CITY COUNCIL APPROVE AND ADOPT GENERAL PLAN AMENDMENT NO. GPA 2021-02 (2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE)**

### **A. Recitals.**

Whereas, on January 11, 2022 and continued to March 8, 2022, the Planning Commission of the City of Placentia conducted, and concluded, a duly noticed public hearing, as required by law, to review and make a recommendation to the City Council regarding General Plan Amendment (GPA 2021-02): an update to the City of Placentia General Plan to adopt the 2021-2029 General Plan Housing Element Update; and

Whereas, the Housing Element Update was prepared in accordance with Government Code Sections 65580 through 65589; and

Whereas, on October 21, 2021 the City submitted the draft Housing Element Update to the State Department of Housing and Community Development (HCD) for review and comment, in accordance with State housing law (Government Code Section 65585); and

Whereas, on December 20, 2021, HCD provided written correspondence indicating that the draft Element addressed many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Government Code); and

Whereas, the Draft Housing Element has been revised to address HCD's comments of December 20, 2021 as described in the Planning Commission staff reports dated January 11, 2022 and March 8, 2022, in compliance with State law; and

Whereas, the City as Lead Agency determined that the proposed General Plan Amendment (Housing Element update) is covered by the common sense CEQA exemption (CEQA Guidelines Sec. 15061(b)(3)) which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment, and therefore is not subject to CEQA; and

Whereas, the Planning Commission is responsible for reviewing updates to the General Plan and forwarding a recommendation to the City Council on the adoption; and

Whereas, the Commission has reviewed and considered information from a variety of sources, including, but not limited to, City staff, outside agencies, and members of the public; and

Whereas, the City of Placentia provided notice of public hearing in accordance with California Government Code Section 65090 and the City of Placentia Municipal Code by ad publication in a local newspaper at least 10 days prior to the public hearing; and

Whereas, all other legal prerequisites to the adoption of this Resolution have occurred.

**B. Resolution.**

NOW, THEREFORE, the Planning Commission of the City of Placentia makings the following findings and recommendations to the City Council:

SECTION 1. The recitals set forth above are true and correct and adopts those recitals as though fully set forth herein.

SECTION 2. Find that the proposed General Plan Amendment (Housing Element update) is covered by the common sense CEQA exemption (CEQA Guidelines Sec. 15061(b)(3)) which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment, and therefore is not subject to CEQA.

SECTION 3. Adopt the proposed General Plan Housing Element Update as described in Exhibit "A" of this Resolution and by this reference incorporated as though fully set forth herein, which contains a thorough and adequate treatment of housing and all required components of a State compliant Housing Element.

SECTION 4. The proposed General Plan update is internally consistent and would not be a detriment to the public interest, health, safety, convenience, and welfare of the city.

SECTION 5. The proposed General Plan has been prepared in accordance with the California Government Code, and in accordance with the provisions of the California Environmental Quality Act.

SECTION 6. If any section, subsection, sentence, clause, or phrase of this resolution and/or the documents in support of this resolution is/are for any reason held to

be invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this resolution.

SECTION 7. The Secretary to the Planning Commission shall certify to the adoption of this Resolution.

PASSED and ADOPTED this 8th day of March, 2022.

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Frank Perez, Vice Chair

I, Joseph M. Lambert, Secretary to the Planning Commission of the City of Placentia, do hereby certify that the foregoing Resolution was introduced at a regular meeting of the Planning Commission of the City of Placentia held on the 8th day of March, 2022, and was passed at this regular meeting of the Planning Commission of the City of Placentia held on the 8th day of March, 2022, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAINED:

ATTEST:

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Joseph M. Lambert,  
Secretary to the Planning Commission

APPROVED AS TO FORM:

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Kathya Firlik  
Assistant City Attorney

Exhibit A: 2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE

**EXHIBIT A**

2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE:

[https://www.placentia.org/DocumentCenter/View/9649/Placentia-6th-Housing-Element\\_2022-03-08a\\_revised-draft-tracked](https://www.placentia.org/DocumentCenter/View/9649/Placentia-6th-Housing-Element_2022-03-08a_revised-draft-tracked)

# City of Placentia Housing Element 2021-2029



REVISED DRAFT

March~~October~~ 2022~~1~~





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# Chapter 1: Introduction

This Housing Element provides the identification and analysis of existing and projected housing needs and articulates the City’s official policies for the preservation, conservation, improvement, and production of housing within the City of Placentia for the 2021-2029 planning period.

## 1.1 Purpose and Content

The City of Placentia’s Housing Element addresses adequate housing opportunities for present and future residents through 2029 and provides the primary policy guidance for local decision-making related to housing.

*California Government Code* §65583 requires a jurisdiction’s Housing Element include the following components:

- A review of the previous Element’s goals, policies, objectives and programs to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element;
- An assessment of housing need and an inventory of resources and constraints related to meeting these needs;
- A statement of goals, policies and quantified objectives related to the maintenance, preservation, improvement and development of housing; and
- A policy program that provides a schedule of actions that the City is undertaking or intends to undertake implementing the policies set forth in the Housing Element.

## 1.2 Housing Element Update Process

The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the state’s main housing goal. Recognizing the important part that local planning programs play in pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of their comprehensive General Plans (*California Government Code* §65302(c)).

This Housing Element update covers the planning period from October 2021 to October 2029. State planning law mandates that jurisdictions review and update their Housing Elements every 8 years in order to remain relevant and useful and reflect the community’s changing housing needs.



## 1.3 State Law and Local Planning

### Consistency with State Law

The Housing Element is one of the seven General Plan elements required by the State of California, as articulated in §65580 to §65589.8 of the *California Government Code*. It is the only General Plan Element that requires review by the State of California. State law requires that each jurisdiction’s Housing Element consist of “an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled program actions for the preservation, improvement, and development of housing.” The Housing Element plans for the provision of housing for all segments of the population.

Section 65583 of the *Government Code* sets forth specific requirements regarding the scope and content of each Housing Element. Table 1-1 summarizes these requirements and identifies the applicable sections in the Housing Element where these requirements are addressed.

Table 1-1 – State Housing Element Requirements	
Required Housing Element Component	Reference
A. Housing Needs Assessment	
1. Analysis of population trends in Placentia in relation to countywide trends	Chapter 2
2. Analysis of employment trends in Placentia in relation to regional trends	Chapter 2
3. Projections and quantification of Placentia’s existing and projected housing needs for all income groups	Chapter 2
4. Analysis and documentation of the city’s housing characteristics, including:	
a. Level of housing cost compared to ability to pay	Chapter 2
b. Overcrowding	Chapter 2
c. Housing stock condition	Chapter 2
5. An inventory of land suitable for residential development including vacant sites and having redevelopment potential and an analysis of the relationship of zoning, public facilities and services to these sites	Appendix B
6. Analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels	Chapter 3
7. Analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels	Chapter 3
8. Analysis of special housing need: elderly, persons with disabilities, large families, farm workers, and families with female heads of household	Chapter 2
9. Analysis of housing needs for families and persons in need of emergency shelter	Chapter 2
10. Analysis of opportunities for energy conservation with respect to residential development	Chapter 3
11. Analysis of assisted housing developments that are eligible to convert from lower-income housing to market rate housing during the next 10 years	Chapter 2
B. Goals and Policies	
12. Identification of goals, quantified objectives and policies relative to maintenance, improvement and development of housing	Chapter 4
C. Implementation Program	
13. Identify adequate sites which will be made available through appropriate action with required public services and facilities for a variety of housing types for all income levels	Appendix B



**Table 1-1 – State Housing Element Requirements**

Required Housing Element Component	Reference
14. Programs to assist in the development of adequate housing to meet the needs of Extremely Low, Very Low, Low and Moderate-Income households.	Chapter 4
15. Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing	Chapter 4
16. Remove constraints to or provide reasonable accommodations for housing for persons with disabilities	Chapter 4
17. Conserve and improve the condition of the existing affordable housing stock in Placentia	Chapter 4
18. Promote housing opportunities for all persons	Chapter 4
19. Identify programs to address the potential conversion of assisted housing development to market-rate housing	Chapter 4
20. Program actions to identify zones where emergency shelters are permitted without a conditional use or other discretionary permit and with the capacity to meet the needs of individuals and persons needing emergency shelter.	Chapter 4

### General Plan Consistency

The *California Government Code* requires internal consistency among the various elements of a General Plan. Section 65300.5 of the *Government Code* states that the General Plan’s various Elements shall provide an integrated and internally consistent and compatible statement of policy. The City has reviewed the other elements of the General Plan and has determined that this Housing Element provides consistency with the other Elements of the General Plan. The City will maintain this consistency as future General Plan amendments are processed by evaluating proposed amendments for consistency with all elements of the General Plan.

### Relationship to Other Plans and Programs

The Housing Element identifies goals, objectives, policies, and action programs for the next eight years that directly address the housing needs of Placentia. Other City plans and programs that work to implement the goals and policies of the Housing Element include the City’s Municipal Code, Specific Plans, Capital Improvement Program and the annual budget process.

## 1.4 Housing Element Organization

The Housing Element is organized into four sections:

- Chapter 1: Introduction describes the purpose, organization and requirements of the Housing Element;
- Chapter 2: Housing Profile analyzes the demographic, economic and housing trends in Placentia and describes the housing needs of the city;
- Chapter 3: Resources and Constraints Analysis analyzes the governmental and non-governmental constraints to and resources for housing; and,



- Chapter 4: Housing Policy Program provides goals and policy actions for the construction, conservation, rehabilitation, and preservation of housing in Placentia.

Supporting background material is included in the following appendices:

- Appendix A: Community Outreach
- Appendix B: Residential Land Inventory
- Appendix C: Review of Housing Element Performance
- Appendix D: Affirmatively Furthering Fair Housing
- Appendix E: Glossary

### 1.5 Citizen Participation

This Housing Element was developed through the combined efforts of City staff, the Planning Commission, the City Council, and the City's residents and stakeholders. Citizen input was received through website postings, public workshops and public hearings conducted by City staff, the Planning Commission and City Council. The notices for these workshops and hearings were sent directly to a list of interested parties, published in a local newspaper, on the City's website and prominently posted at City Hall and other public facilities. Throughout the process, organizations that represent the interests of lower-income and special needs households, or are otherwise involved in the development of housing, were invited to participate in the preparation and review of the Housing Element. The list of stakeholders who were invited to participate in the Housing Element update process is provided in Appendix A.

Comments received through the City's outreach activities have been considered in the development of the Housing Policy Program provided in Chapter 4 of this Housing Element. Additional information regarding the public participation process is provided in Appendix A.



## Chapter 2: Housing Needs Assessment

### 2.1 Introduction

When preparing the Housing Element, jurisdictions must evaluate existing and future housing needs for all income groups.

This section analyzes demographic and housing characteristics that influence the demand for and availability of housing. The analyses form a foundation for establishing programs and policies that seek to address identified housing needs. Housing needs are identified according to income, tenure, and special needs groups. Finally, the City's projected housing growth needs based on the 2021-2029 Regional Housing Needs Assessment (RHNA) are examined.

Primary data sources include the U.S. Census, the California Department of Finance, the Southern California Association of Governments, and other relevant data sources. These data sources are the most reliable for assessing existing conditions and provide a basis for comparison with historical trends.

It is important to note that different data may appear inconsistent for a variety of reasons. Some data reflect a "snapshot in time" while other such as Census American Community Survey ("ACS") estimates are based on a sample survey conducted over a period of several years. Also, many data sources are based on self-reporting, which can lead to variations. Because of these factors, statistics reported in this chapter should be viewed as estimates rather than precise counts.

### 2.2 Community Profile

#### Population Trends and Characteristics

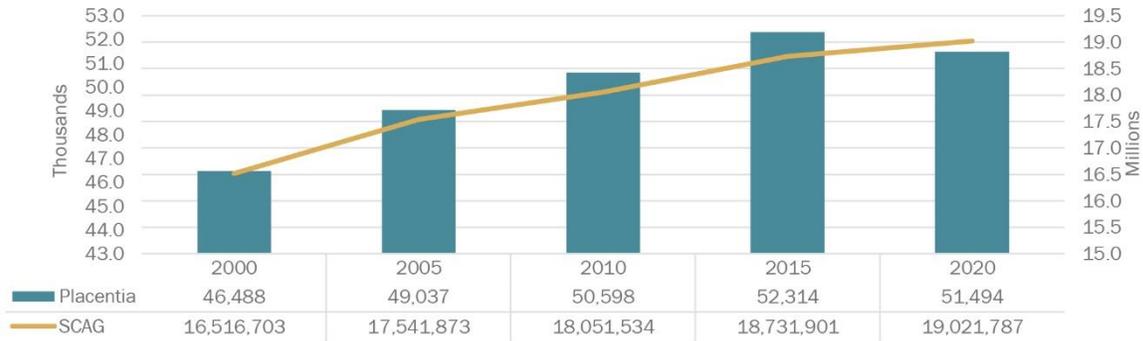
Housing needs are generally influenced by population and employment trends. This section provides a summary of population characteristics in Placentia.

#### Historical, Existing and Forecast Growth

The City of Placentia is one of the 34 cities within Orange County. Placentia had an estimated 2020 total population of 51,494 including 337 living in group quarters according to the California Department of Finance (DOF). Figure 2-1 shows population trends in Placentia from 2000 to 2020. Over this period Placentia had an annual growth rate of about 0.5% compared to 0.7% for the region.



Figure 2-1 – Population Growth– 2000-2020, Placentia vs. SCAG Region

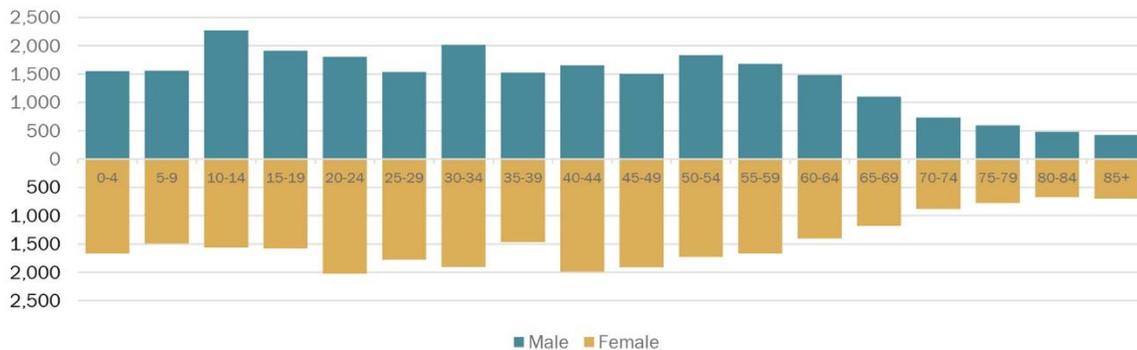


CA DOF E-5 Population and Housing Unit Estimates

### Age Composition

Housing needs are influenced by the age characteristics of the population. Different age groups require different accommodations based on lifestyle, family type, income level, and housing preference. According to recent Census estimates the population of Placentia is approximately 49.3% male and 50.7% female (Figure 2-2). The share of the population of Placentia under 18 years of age is 23.7%, which is higher than the regional share of 23.4%. Placentia’s seniors (65 and above) make up 14.5% of the population, which is higher than the regional share of 13%.

Figure 2-2 – Population by Age and Gender, Placentia



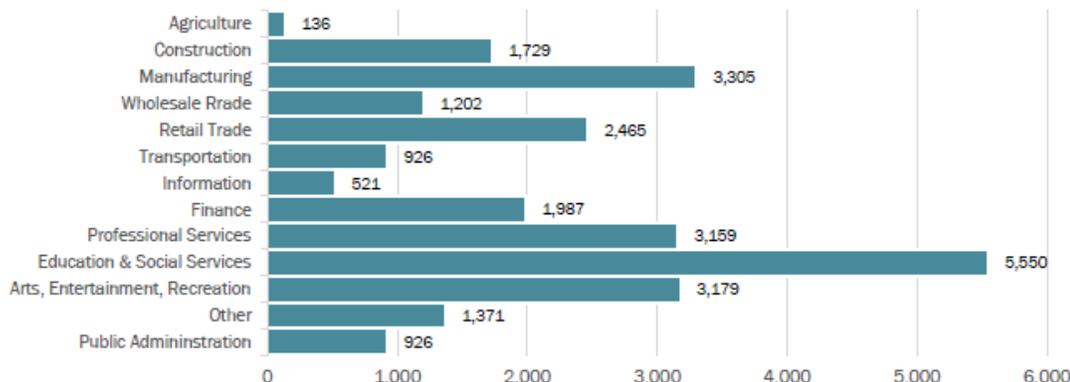
American Community Survey 2014-2018 5-year estimates

### Employment Trends

Current employment and projected job growth have a significant influence on housing needs during this planning period. Recent employment estimates reported that Placentia has 26,456 workers living within its borders who work across 13 major industrial sectors (Figure 2-3). The most prevalent industry is Education & Social Services with 5,550 employees (21% of total) and the second most prevalent industry is Manufacturing with 3,305 employees (12.5% of total).



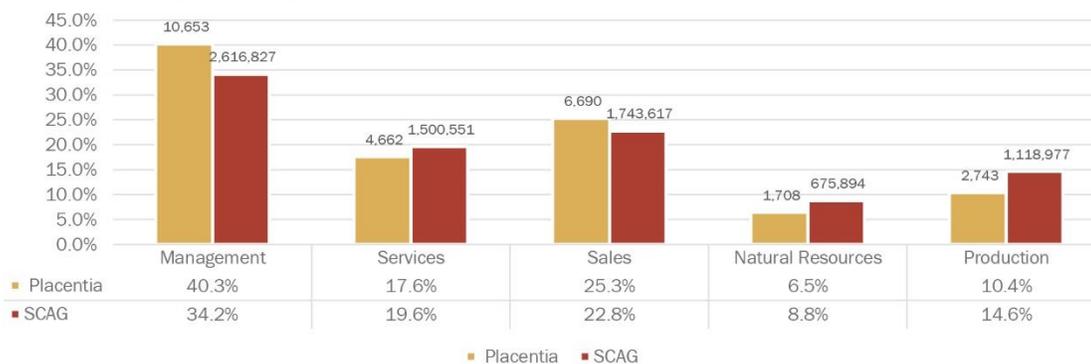
**Figure 2-3 – Employment by Industry, Placentia**



American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes.

The most prevalent occupational category in Placentia is Management, in which 10,653 (40.3% of total) employees work. The second-most prevalent type of work is in Sales, which employs 6,690 (25.3% of total) in Placentia (Figure 2-4).

**Figure 2-4 – Employment by Occupation, Placentia**



American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

### Household Characteristics

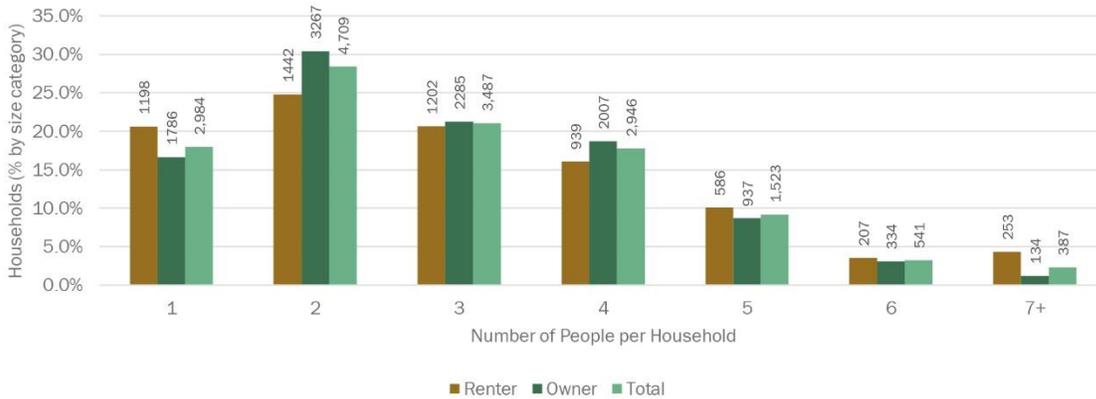
This section describes Placentia’s household characteristics, which are important indicators of the type and size of housing needed in the city. The U.S. Census Bureau defines a “household” as all persons living in a single housing unit, whether or not they are related. One person living alone is considered a household, as is a group of unrelated people living in a single housing unit. Persons in group quarters, such as dormitories, retirement or convalescent homes, or other group living situations are included in population totals but are not considered households. The U.S. Census Bureau defines a family as “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.”



### Household Size and Overcrowding

Figure 2-5 shows recent estimates of household size for Placentia. The most commonly occurring household size is two people (28.4%) and the second-most commonly occurring household is three people (21%). Placentia has a lower share of single-person households than the SCAG region overall (18% vs. 23.4%) and a lower share of 7+ person households than the SCAG region overall (2.3% vs. 3.1%). The special needs of large families are discussed in the Special Needs section later in this chapter).

**Figure 2-5 – Household Size, Placentia**



American Community Survey 2014-2018 5-year estimates.

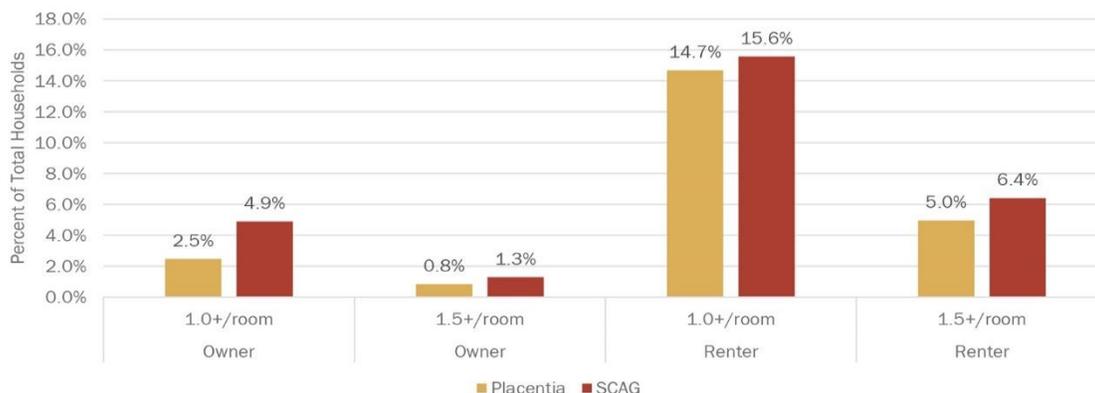
**Overcrowding** is defined as households having more than one person per room, excluding bathrooms and kitchens, with severe overcrowding when there are more than 1.5 occupants per room. Overcrowding can affect the health and well-being of residents, reduce the quality of the physical environment and contribute to physical deterioration of housing units.

Figure 2-6 summarizes recent Census estimates of overcrowding in Placentia compared to the SCAG region as a whole. In Placentia, 266 owner-occupied and 855 renter-occupied households had more than 1.0 occupants per room, while 90 owner-occupied households and 289 renter-occupied households had more than 1.5 occupants per room.

[The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing \(see Program 1.3: Pursue County, State, and Federal Housing Funds, Program 1.8: Adequate Sites for Housing Development, Program 1.10: Encourage Development of Housing for Extremely-Low-Income Households, Program 1.11: Density Bonus Ordinance, Program 1.13: Development of Housing for Larger Families, Program 2.2: Section 8 Rental Assistance, Program 2.4: Comprehensive Housing Resource Directory, Program 3.5: Monitor and Preserve At-Risk Units, Program 4.1: Partnerships with the Housing Industry\).](#)



**Figure 2-6 – Overcrowding, Placentia vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

### Overpayment

Housing cost burden, or overpayment, is most commonly measured as the percentage of gross income spent on housing, with 30% a usual threshold for 'cost burden' and 50% the threshold for "severe cost burden." However, a lower-income household spending the same percent of income on housing as a higher-income household will likely experience more true "cost burden." Figure 2-7 shows HUD estimates of the number of households in Placentia by tenure, their income category and their share of income spent on housing. This data shows that households in the lower income categories, especially renters, typically spend a higher portion of their incomes for housing.

The problems of overpayment are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Program 1.3: Pursue County, State, and Federal Housing Funds, Program 1.8: Adequate Sites for Housing Development, Program 1.10: Encourage Development of Housing for Extremely-Low-Income Households, Program 1.11: Density Bonus Ordinance, Program 1.13: Development of Housing for Larger Families, Program 2.2: Section 8 Rental Assistance, Program 2.4: Comprehensive Housing Resource Directory, Program 3.5: Monitor and Preserve At-Risk Units, Program 4.1: Partnerships with the Housing Industry).

**Figure 2-7 – Overpayment by Income Category and Tenure, Placentia**

Income	Households by Share of Income Spent on Housing Cost:		
	< 30%	30-50%	> 50%
< 30% HAMFI	400	325	1,240
30-50% HAMFI	534	810	765
50-80% HAMFI	1,580	1,185	539
80-100% HAMFI	1,275	590	70
> 100% HAMFI	6,215	830	70
<b>Total Households</b>	<b>10,004</b>	<b>3,740</b>	<b>2,684</b>

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.



Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	845	785	1,015
Household Income >30% to less-than or= 50% HAMFI	850	465	1,015
Household Income >50% to less-than or= 80% HAMFI	870	195	1,360
Household Income >80% to less-than or= 100% HAMFI	295		855
Household Income >100% HAMFI	80		1,575
<b>Total</b>	<b>2,940</b>	<b>1,445</b>	<b>5,825</b>
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	605	400	865
Household Income >30% to less-than or= 50% HAMFI	345	170	695
Household Income >50% to less-than or= 80% HAMFI	870	345	1,750
Household Income >80% to less-than or= 100% HAMFI	465	65	1,115
Household Income >100% HAMFI	975	30	6,320
<b>Total</b>	<b>3,260</b>	<b>1,010</b>	<b>10,750</b>

### Extremely-Low-Income Households

Extremely-low-income (ELI) households are defined as households with incomes less than 30 percent of median family income (MFI). State law requires quantification and analysis of existing and projected housing needs of ELI households. As noted in Figure 2-7 above, recent Census data estimated that approximately 1,965 Placentia households were within the ELI category. As noted in Figure 2-8 below, approximately 19 percent of renters were ELI and about 8 percent of owners were ELI. The race/ethnicity with the highest share of extremely-low-income households in Placentia is Hispanic (19.7% compared to 12.1% of total population). ELI households often have other housing problems such as overcrowding due to insufficient incomes to afford large enough dwellings. As seen in Figure 2-7, 845 ELI renter households and 605 ELI owner households were paying more than 30% of income for housing. In addition, 785 ELI renter households and 400 ELI owner households were paying over 50% of income for housing.



**Figure 2-8 – Extremely-Low-Income Households by Race and Tenure, Placentia**

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	8,870	830	9.4%
Black, non-Hispanic	169	30	17.8%
Asian and other, non-Hispanic	2,978	260	8.7%
Hispanic	4,435	875	19.7%
<b>TOTAL</b>	<b>16,452</b>	<b>1,995</b>	<b>12.1%</b>
Renter-occupied	5,680	1,100	19.4%
Owner-occupied	10,780	905	8.4%
<b>TOTAL</b>	<b>16,460</b>	<b>2,005</b>	<b>12.2%</b>

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

The projected needs of ELI households are discussed below as part of the Future Housing Needs analysis.

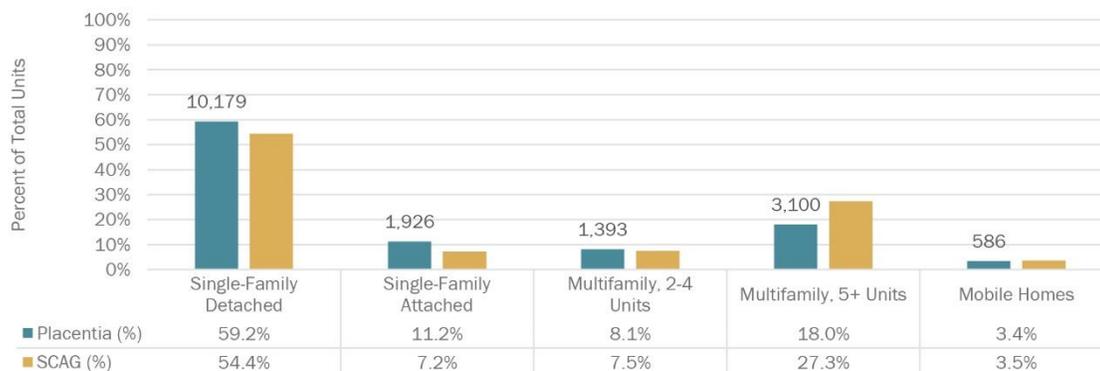
### Housing Inventory and Market Conditions

This section describes the housing stock and market conditions in the City of Placentia.

#### Housing Stock Profile

Figure 2-9 provides recent estimates of the housing stock in Placentia, which has a total of approximately 17,184 housing units. The most prevalent housing type in Placentia is single-family detached with about 59% of all units. The share of all single-family units, including condos, in Placentia is 70.4%, which is higher than the 61.7% share in the SCAG region. The estimated total vacancy rate in the city is 2.8% while the average household size (as expressed by the population to housing unit ratio) is about 3.1 persons.

**Figure 2-9 – Housing by Type, Placentia vs. SCAG Region**

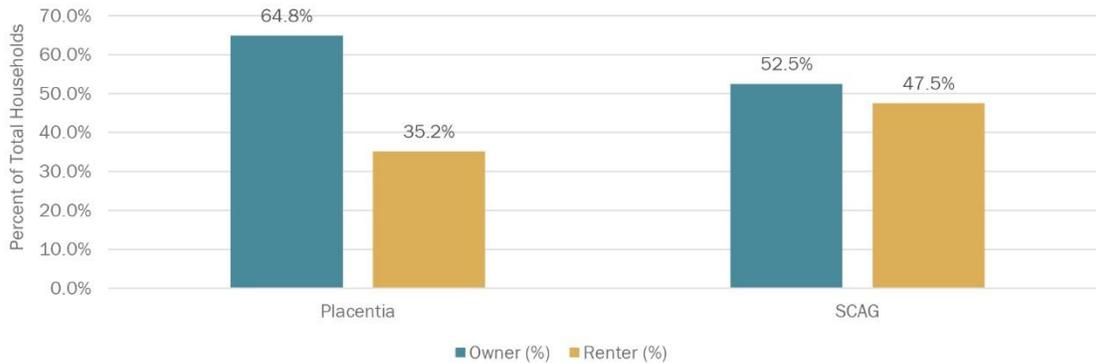


CA DOF E-5 Population and Housing Unit Estimates



Approximately 65 percent of Placentia’s housing units were owner-occupied and 35 percent of the units were renter-occupied. As shown in Figure 2-10, the percentage of owner-occupied units in Placentia is higher than in the SCAG region as a whole.

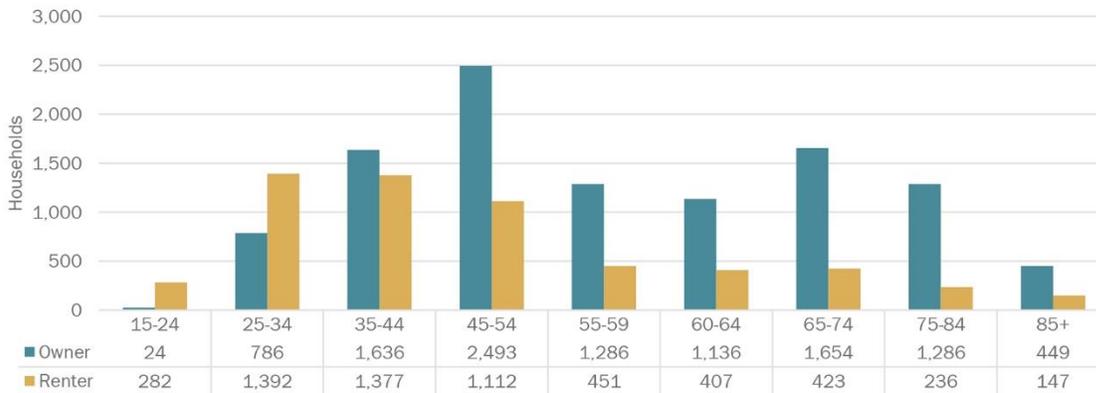
**Figure 2-10 – Housing by Tenure, Placentia vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

As shown in Figure 2-11, Placentia residents under age 35 are more likely to be renters than those in older age groups.

**Figure 2-11 – Housing Tenure by Age of Householder, Placentia**



American Community Survey 2014-2018 5-year estimates.

### Housing Age and Conditions

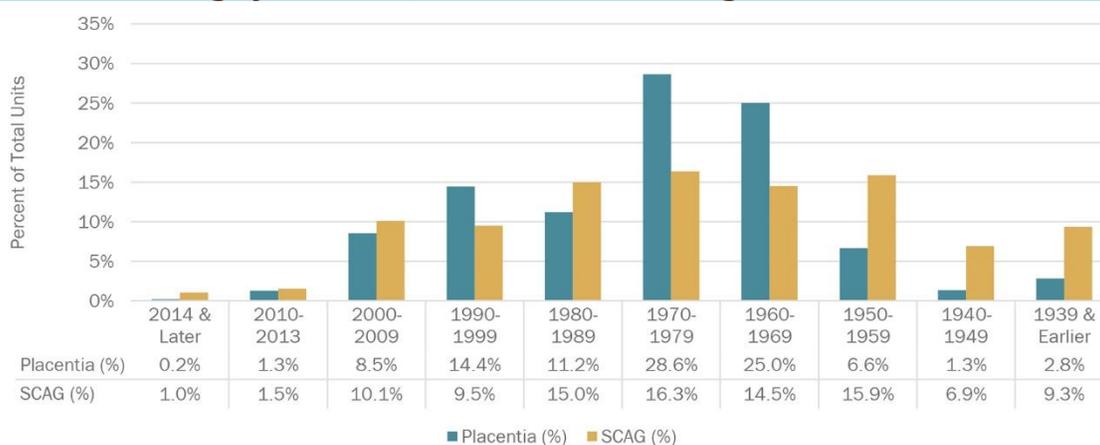
The age of a housing unit is often an indicator of housing conditions. Housing units without proper maintenance can deteriorate over time. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls or is pulverized by windows and doors opening and closing.

Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs. Additionally, older units may not be built to current building standards for fire and earthquake safety.



The age of housing units in Placentia compared to the SCAG region as a whole is shown in Figure 2-12. Nearly two-thirds of Placentia’s housing units were constructed prior to 1980 and are now more than 40 years old. These findings suggest that there may be a substantial need for maintenance and rehabilitation, including remediation of lead-based paint. Based upon field observations of the City building inspectors and code enforcement staff, it is estimateds there are more than 200 substandard housing units currently in the City, which are primarily concentrated in the La Jolla and Santa Fe areas. Less than 5% of those (10 units) may have structural problems that are not feasible to repair and therefore are in need of total replacement. Housing programs to assist lower-income households with needed repairs are described in Chapter 4.

**Figure 2-12 – Housing by Year Built, Placentia vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

## Housing Costs and Affordability

This section evaluates housing cost and affordability in Placentia.

### 1. Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the area (i.e., county) median income (AMI): extremely-low (30% or less of AMI), very-low (31%-50% of AMI), low (51%-80% of AMI), moderate (81-120% of AMI) and above moderate (over 120% of AMI). Housing affordability is based on the relationship between household income and housing expenses. According to HUD and the California Department of Housing and Community Development<sup>1</sup>, housing is considered “affordable” if the monthly payment is no more than 30% of a household’s gross income. In some areas, such as Orange County, these income limits may be increased to adjust for high housing costs.

Table 2-1 shows affordable rent levels and estimated affordable purchase prices for housing in all areas of Orange County<sup>2</sup> by income category. Based on State standards,

1 HCD memo of 2/1/2012 (<http://www.hcd.ca.gov/hpd/hrc/rep/state/incNote.html>)  
 2 Affordable rent and purchase prices are based on county median income.



the maximum affordable monthly rent (including utilities) for extremely-low-income households is \$1,009, while the maximum affordable rent for very-low-income households is \$1,681. The maximum affordable rent for low-income households is \$2,689, while the maximum for moderate-income households is \$3,201.

Maximum purchase prices are more difficult to determine due to variations in factors such as mortgage interest rates, qualifying procedures, down payments, special tax assessments, homeowner association fees, and property insurance rates. With this caveat, the maximum home purchase prices by income category shown in Table 2-1 have been estimated based on typical conditions.

**Table 2-1 – Income Categories and Affordable Housing Costs, 2021 – Orange County**

Income Category	Maximum Income	Affordable Rent	Affordable Price (est.)
Extremely Low	\$40,350	\$1,009	*
Very Low	\$67,250	\$1,681	*
Low	\$107,550	\$2,689	*
Moderate	\$128,050	\$3,201	\$500,000
Above moderate	Over \$128,050	Over \$3,201	Over \$500,000

Assumptions: Based on a family of 4 and 2021 State income limits; 30% of gross income for rent or principal, interest, taxes & insurance; 5% down payment, 4% interest, 1.25% taxes & insurance, \$350 HOA dues

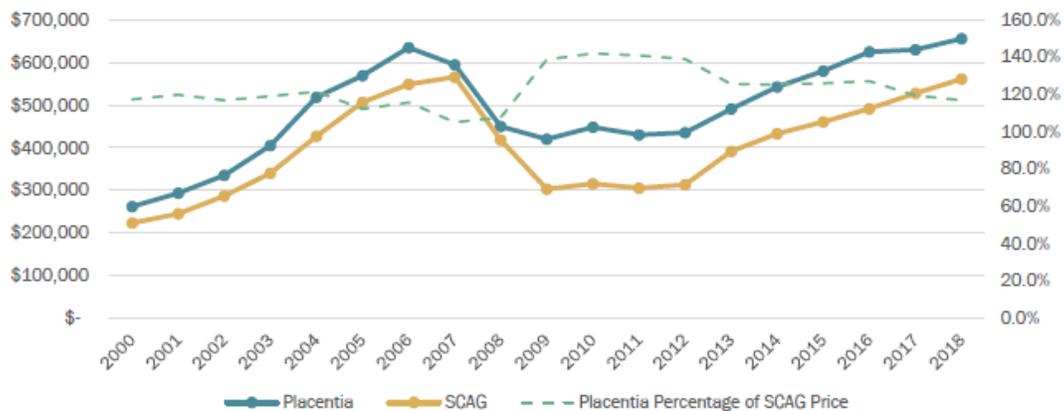
\*For-sale affordable housing is typically at the moderate income level

Source: Cal. HCD; JHD Planning LLC

## 2. Home Price Trends

Between 2000 and 2018, median home sales prices in Placentia increased 150% while prices in the SCAG region increased 151%. 2018 median home sales prices in Placentia were \$655,500 and the highest experienced since 2000 was \$655,500 in 2018. Prices in Placentia have ranged from a low of 105.1% of the SCAG region median in 2007 and a high of 141.9% in 2010 (Figure 2-13). The most common monthly cost for homeowners in Placentia is \$2,000-3,000 (Figure 2-14).

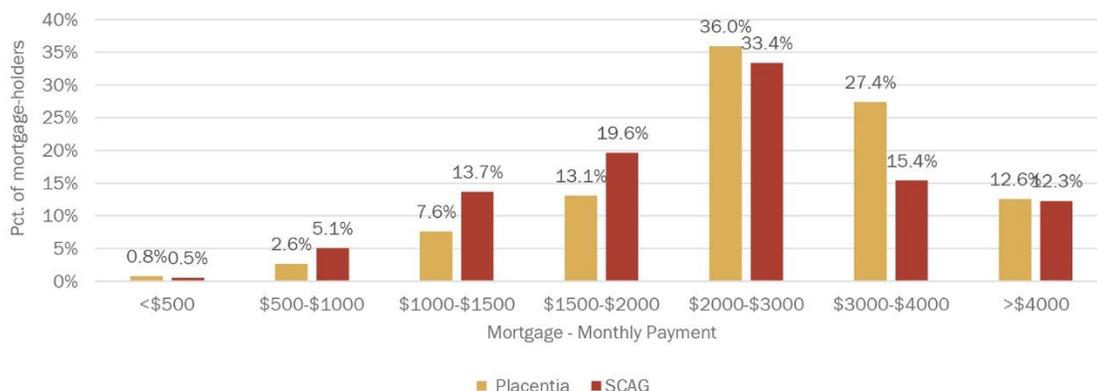
**Figure 2-13– Median Sale Price for Existing Homes, Placentia vs. SCAG Region**



SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians.



**Figure 2-14– Monthly Owner Cost for Mortgage Holders, Placentia vs. SCAG Region**

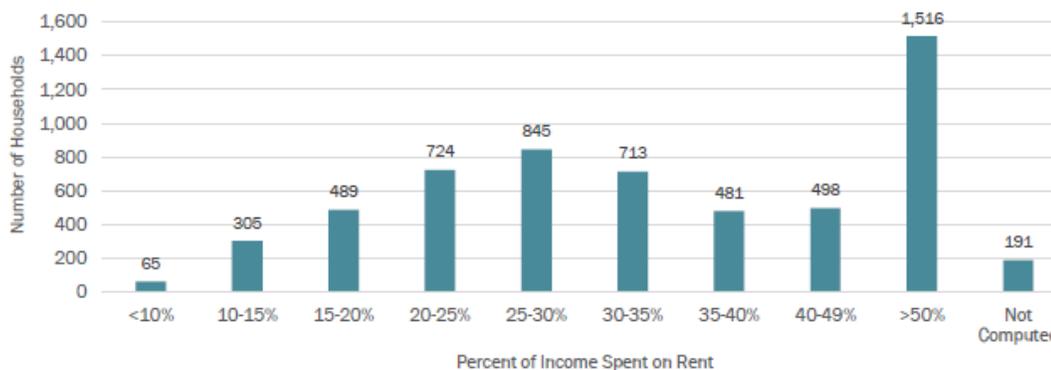


American Community Survey 2014-2018 5-year estimates.

### 3. Rental Cost

About 55% of Placentia renters spend 30% or more of gross income on housing, which is similar to the SCAG region as a whole (Figure 2-15). About 26% of renter households in Placentia spend 50% percent or more of gross income on housing, compared to 29% in the SCAG region as a whole. According to recent Census estimates the median rent in Placentia is approximately \$1,792 per month.

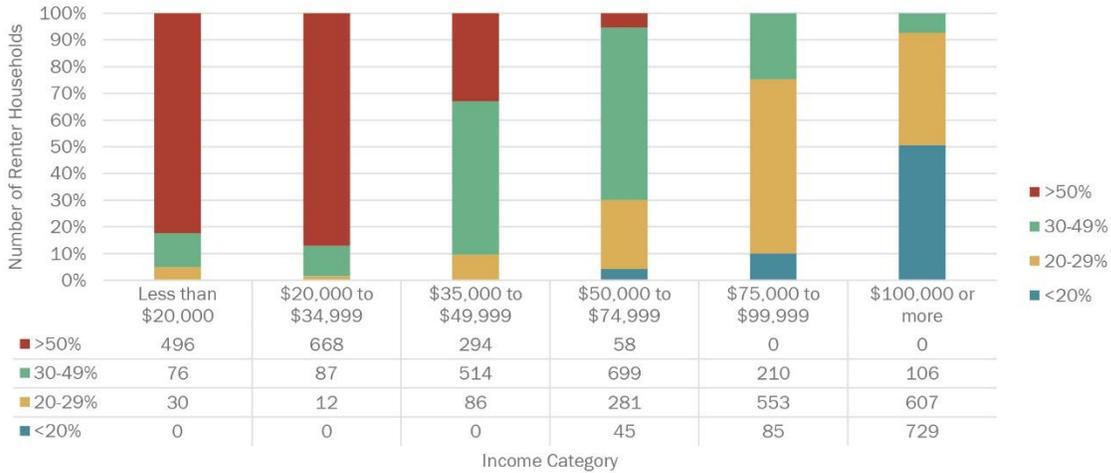
**Figure 2-15– Rental Cost, Placentia**



(Figure 2-16) shows that renters in the lower income categories typically spend a much higher percentage of their incomes on housing expenses compared to those with higher incomes.



Figure 2-16 – Rental Cost by Income Category, Placentia



American Community Survey 2014-2018 5-year estimates.

### Special Needs Groups

Certain segments of the population may have more difficulty in finding affordable and suitable housing due to special needs. This section identifies the needs for elderly persons, large households, female-headed households, persons with disabilities, persons who are homeless, and farmworkers.

#### Elderly Persons

Elderly persons are considered a special needs group because they are more likely to have fixed incomes and often have special needs related to housing location and construction. Because of limited mobility, elderly persons may need convenient access to services (e.g., medical and shopping) and public transit. Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over. Recent Census estimates (Figure 2-17) reported that about 19% of elderly households in Placentia have incomes less than 30% of median, (compared to 24% in the SCAG region as a whole), while about 36% of Placentia’s senior households earn less than 50% of the median income (compared to 31% in the region).

While sometimes viewed as a homogeneous group, seniors have a wide variety of circumstances and needs. For example, senior homeowners often have more financial resources and stable housing expenses than renters. Younger seniors under age 75 generally have fewer disability issues than those who are older and may require residential care or supportive housing options. As homeowners age, many may have difficulty maintaining their homes.

As shown in Figure 2-21, among seniors 65 and older the most common disability was ambulatory, experienced by about 18% of Placentia's seniors (and 23% of seniors in the entire SCAG region). The installation of grab bars and other features may be necessary to address mobility issues.



The California Community Care Licensing Division identifies 48 licensed residential care homes for the elderly with a total of 940 beds in Placentia. Most of these are small facilities for up to 6 persons, although there are five larger facilities.

As discussed in Chapter 3, City regulations encourage a range of housing options to address the diverse needs of the growing senior population, including the residential care facilities, supportive housing, accessory dwelling units and reasonable accommodation for persons with disabilities. Program 1.12 in the Housing Plan also includes efforts to encourage development of additional senior housing.

**Figure 2-17 – Elderly Households by Income and Tenure, Placentia**

		Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:	< 30% HAMFI	435	380	815	19.0%
	30-50% HAMFI	540	190	730	17.1%
	50-80% HAMFI	910	155	1,065	24.9%
	80-100% HAMFI	355	105	460	10.7%
	> 100% HAMFI	1,145	65	1,210	28.3%
<b>TOTAL</b>		<b>3,385</b>	<b>895</b>	<b>4,280</b>	

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

### Large Households

Large households are defined as having five or more persons living within the same housing unit. Large households are considered a special needs group because they require more space and more bedrooms. Large households are vulnerable to overcrowding, particularly among renters, due to the relatively small percentage of apartments with 3 or more bedrooms. As noted previously in the analysis of household size (Figure 2-5) According to recent Census data, about 1,046 (18%) of renter households (18%) and 1,405 (13%) of owner households (13%) in Placentia had at least five persons – a total of 2,451 households. According to recent Census estimates there are approximately 11,000 housing units with 3+ bedrooms (65%) and of those, about 5,957 (35%) had at least 4 bedrooms). In terms of the total housing stock, there appears to be a sufficient number of larger homes to meet the needs of large households, but many of those households may not have sufficient financial resources to afford a large enough home to avoid overcrowding. The needs of large households are addressed through City efforts (see Program 1.13 in the Housing Plan)s to facilitate production of housing with 3 or more bedrooms as well as through State and Federal programs such as Section 8 and affordable housing subsidies such as Low Income Housing Tax Credits.

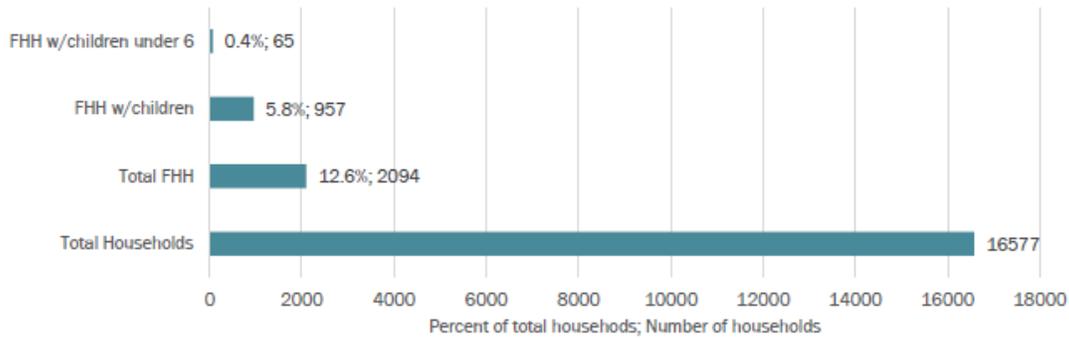
### Female-Headed Households

Female-headed households are a special needs group due to comparatively low rates of homeownership, lower incomes, and higher poverty rates experienced by this group. According to recent Census data (Figure 2-18), 12.6% of Placentia households are



female-headed (compared to 14.3% in the SCAG region), 5.8% are female-headed and with children (compared to 6.6% in the SCAG region), and 0.4% are female-headed and with children under 6 (compared to 1.0% in the SCAG region).

**Figure 2-18– Female Headed Households, Placentia**

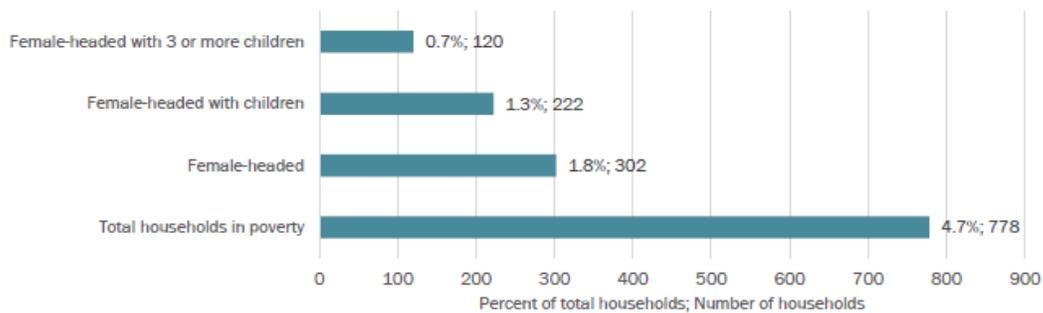


American Community Survey 2014-2018 5-year estimates.

Approximately 5% of Placentia's households are experiencing poverty, compared to 8% in the SCAG region as a whole. Poverty thresholds vary by household type. In 2018, a single individual under 65 was considered in poverty with an income below \$13,064/year while the threshold for a family consisting of 2 adults and 2 children was \$25,465/year. Figure 2-19 shows recent estimates of poverty status for female-headed households in Placentia.

The needs of female-headed households are addressed through City programs to facilitate affordable housing development as well as through State and Federal programs such as Section 8 and affordable housing subsidies such as Low Income Housing Tax Credits.

**Figure 2-19– Households by Poverty Status, Placentia**



American Community Survey 2014-2018 5-year estimates.

### Persons with Disabilities

A disability is defined as a long-lasting condition that impairs an individual's mobility, ability to work, or ability to care for them self. Persons with disabilities include those

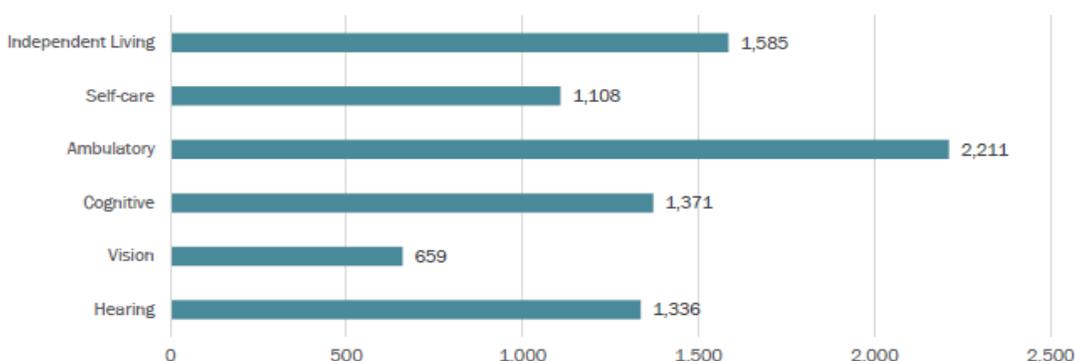


with physical, mental, or emotional disabilities. Access and affordability are the two major housing needs for persons with disabilities. This often requires specially designed dwelling units typically not found in market-rate housing, or supportive housing that also provides personal services and assistance with daily activities. Additionally, locating near public facilities and public transit is important for this special needs group.

According to recent ACS estimates (Figure 2-20), the most commonly occurring disabilities for Placentia residents are ambulatory and independent living. Among seniors 65 and older the most common disability was ambulatory, experienced by about 18% of Placentia's seniors (and 23% of seniors in the entire SCAG region).

To assist persons with disabilities the City has adopted reasonable accommodation procedures to allow modifications to regulations to accommodate the needs of persons with disabilities (see Program 2.3 in the Housing Plan). The City also continues to expand accessible housing options to persons living with disabilities by including accessibility features in new developments, and Program 1.4 includes amendments to City regulations for supportive housing.

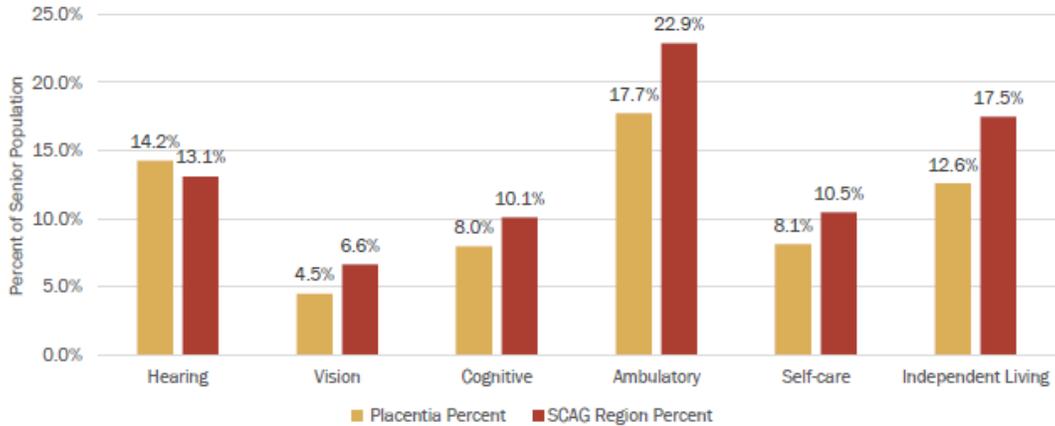
**Figure 2-20– Disabilities by Type, Placentia**



*American Community Survey 2014-2018 5-year estimates.*



**Figure 2-21– Disabilities by Type for Seniors 65+, Placentia vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

### Developmental Disabilities

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

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

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. 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) currently provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. The Regional Center of Orange County (RCOC) is one of 21 regional centers in the State of California that provides point of entry to services for people with developmental disabilities. The RCOC is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

Any resident of Orange County who has a developmental disability that originated before age 18 is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans and may include: Adult day programs; advocacy; assessment/consultation; behavior management programs; diagnosis and evaluation; independent living services; infant development programs; information and referrals; mobility training; prenatal diagnosis; residential care; respite care; physical and occupational therapy; transportation; consumer, family vendor training; and vocational training. RCOC also coordinates the state-mandated Early Start program, which provides services for children under age three who have or are at substantial risk of having a developmental disability. Figure 2-22 shows recent DDS data for persons with developmental disabilities in Placentia.

**Figure 2-22 – Developmental Disabilities, Placentia**

		Placentia
<b>By Residence:</b>	Home of Parent/Family/Guardian	349
	Independent/Supported Living	5
	Community Care Facility	5
	Intermediate Care Facility	17
	Foster/Family Home	11
	Other	5
<b>By Age:</b>	0 - 17 Years	392
	18+ Years	224
<b>TOTAL</b>		<b>1008</b>

*CA DDS consumer count by CA ZIP, age group and residence type for the end of June 2019. Data available in 161/197 SCAG jurisdictions.*

The mission of the Dayle McIntosh Center is to advance the empowerment, equality, integration and full participation of people with disabilities in the community. The Center is not a residential program, but instead promotes the full integration of disabled persons into the community. Dayle McIntosh Center is a consumer-driven organization serving all disabilities. Its staff and board are composed of over 50% of people with disabilities. Its two offices service over 500,000 people in Orange County and surrounding areas with disabilities. The Center’s main office is located in Garden Grove, approximately 7 miles south of Placentia.



### Homeless Population and Transitional Housing

The Orange County homeless population includes many working families and individuals who live in cars, parks, under bridges, in motels and in homeless shelters trying to maintain their dignity while they struggle to survive. As a result, most homeless remain hidden. The most recent available Orange County Point-in-Time Count and Survey report of the Homeless (2019) reported 55 unsheltered and 108 sheltered homeless persons in Placentia.

Regional strategies to combat homelessness are developed through Orange County's Continuum of Care System. The goal of the Continuum of Care Strategic Plan is to work toward a seamless system of care through advocacy, homeless prevention, outreach and assessment, emergency shelter, transitional shelter and permanent affordable housing.

Persons threatened with homelessness are often those with incomes at 30% of area median income or below who are paying more than 30% of their income for rent.

The nonprofit 2-1-1 Orange County organization is a 24-hours-a-day, 7 days-a-week, toll-free number that people in need of assistance can call to obtain comprehensive information and referrals to health and human services. Available services include food, shelter, government assistance programs, urgent care, substance abuse and treatment programs, and workforce development.

In early 2019 the North Orange County Service Planning Area for Homelessness Outreach Efforts had reached an important milestone. A regional partnership of 13 cities located in northern Orange County (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park and Yorba Linda) came together to share intelligence and resources to address regional homelessness. Their concept was to promote greater regional coordination on homeless issues while reducing the span of control regarding working with the County of Orange and others.

After months of extensive discussions, negotiations and assessments, two locations within the North Orange County Service Planning Area were identified for the development of "navigation centers" based on a number of factors including zoning, proximity to related services and site availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to a shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in the city of Anaheim that accommodated 325 new beds.

Funding for the Navigation Centers was secured through application and governmental meetings with state, regional, county and local officials resulting in the \$12 million in State of California Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of these Navigation Centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and



ongoing operation of the Navigation Centers. A Memorandum of Understanding was prepared and presented to the City Councils of all thirteen city governments for execution in May 2019. Construction began in 2019 and the opening of the first 100-bed Navigation Center in Placentia occurred on March 31, 2020. This groundbreaking success story was born of the regional need and public official desire to come together to address homelessness and pioneer the way to create and operate a multi-jurisdictional homelessness facility. Programs 1.4, 1.14 and 2.3 identify actions the City is taking to address homelessness.

### Farm Workers

Farm workers are defined as persons whose primary incomes are earned through seasonal agricultural work. Recent Census data (Figure 2-23) estimated that there were approximately 136 total jobs in the farming, fishing and forestry occupations in Placentia and 80 full-time year-round jobs in those occupations.

According to SCAG’s dataset, just 0.2 percent of jobs in all of Orange County are in agriculture and the USDA estimates there were just 340 migrant farmworkers in the County in 2017. Given that Placentia has no remaining land in commercial agriculture, the City has not identified a need for farmworker housing beyond general programs to support housing affordability.

**Figure 2-23 – Agricultural Employment, Placentia**

*Farmworkers by Occupation:*

Placentia	Percent of total Placentia workers:	SCAG Total	
136	0.51%	57,741	Total jobs: Farming, fishing, and forestry occupations
80	0.44%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations

*Employment in the Agricultural Industry:*

Placentia	Percent of total Placentia workers:	SCAG Total	
136	0.51%	73,778	Total in agriculture, forestry, fishing, and hunting
80	0.44%	44,979	Full-time, year-round in agriculture, forestry, fishing, and hunting

*American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.*

## 2.3 Assisted Units “At-Risk” of Conversion

Jurisdictions are required to analyze government-assisted low-income rental housing that is eligible to convert to market rate housing over the next 10 years. State law identifies housing assistance as a rental subsidy, mortgage subsidy, or mortgage insurance to an assisted housing development. Government assisted housing might convert to market rate housing for a number of reasons including expiring subsidies, mortgage repayments or expiration of affordability restrictions.



This section addresses:

- An inventory of assisted housing units that are at-risk of converting to market rate housing during 2021-2031;
- An analysis of the costs of preserving and/or replacing these units;
- Resources that can be used to preserve at-risk units;
- Program efforts for preservation of at-risk housing units; and
- Quantified objectives for the number of at-risk units to be preserved during the Housing Element planning period

**Inventory of At-Risk Units**

Three projects with lower-income rental units are located in Placentia (Table 2-2). According to the California Housing Partnership Corporation (CPHC), the Imperial Villas project could convert to market rate within the next 10 years and is therefore considered to be “at-risk.” [Program HE 3.5 describes actions the City will take to encourage the preservation of this project.](#)

<b>Project</b>	<b>Address</b>	<b>Program</b>	<b>Earliest Conversion Date</b>	<b>Total Units</b>	<b>Assisted Units</b>
Imperial Villas	1050 E. Imperial Hwy.	HUD	2022	58	58
Veterans Village	1924 Orangeview Ave	LIHTC	2072	50	49
Villa La Jolla	734 W. La Jolla St.	LIHTC, HUD	2055	55	54
<b>Total</b>				<b>113</b>	<b>113</b>

Source: California Housing Partnership Corporation, 2021

**Preservation Versus Replacement**

According to CPHC, preservation of existing affordable housing has significant advantages over new construction, including:

- It generally costs half as much and takes half the time than building it new.
- On average it serves much lower income households than new construction.
- New construction alone cannot produce enough affordable housing to meet demand in most markets in California.

**Preservation Strategies**

There are several options for preserving affordable units, including providing local subsidies to offset the difference between the affordable and market rent, acquisition/rehabilitation by a non-profit or public agency, or construction of new affordable housing to replace units lost.

**Local Rental Subsidy.** One strategy for preserving the units at-risk is to provide a local rental subsidy to residents if their affordable units convert to market rate. Assuming an average rent subsidy of \$1,500 per month per unit, the total subsidy that would be needed to extend affordability for the 58-unit Imperial Villas project would be approximately \$1,044,000 per year.



**Acquisition/Rehabilitation.** Acquisition/rehabilitation costs – depends on size, location, current sales figures. Assuming an average cost of \$350,000 per unit, acquisition/rehabilitation of 58 low-income units would cost approximately \$20 million.

**Replacement Through New Construction.** Affordable units lost to conversion can be replaced through new construction. Construction cost would depend on many factors including site acquisition, site preparation, construction and a variety of “soft” costs such as architecture, permit processing, financing and administration. Based on an average cost of \$500,000 per unit, the total cost of replacing 58 affordable units would be approximately \$29 million.

### Resources for Preservation

A variety of programs exist to assist cities in acquiring, replacing or subsidizing at-risk affordable housing units. The following summarizes the available financial resources.

- Community Development Block Grant (CDBG) – CDBG funds are awarded to entitlement communities (entitlement cities and urban counties) on a formula basis for housing activities. Placentia is a participating city in the County of Orange’s Urban County. Funding is awarded on a competitive basis to each participating city. Activities eligible for CDBG funding include acquisition, rehabilitation, economic development, and public services.
- HOME Investment Partnership – HOME funds are awarded on a formula basis for housing activities. The flexible grant program takes into account local market conditions, inadequate housing, poverty, and housing production costs. HOME funding is provided to jurisdictions to assist rental housing or homeownership through acquisition, construction, reconstruction, and/or rehabilitation of affordable housing. The County of Orange allocates funds to participating cities on a competitive basis.
- Section 8 Rental Assistance Program – The Section 8 Rental Assistance Program provides rental assistance payments to owners of private, market rate units on behalf of very-low income tenants. Rental assistance is provided through the Orange County Housing Authority.
- California Housing Finance Agency (CalHFA) Multifamily Programs- CalHFA’s Multifamily Programs provide permanent financing for the acquisition, rehabilitation, and preservation or new construction of rental housing that includes affordable rents for low and moderate-income families and individuals. One of the programs is the Preservation Acquisition Finance Program which is designed to facilitate the acquisition of at-risk affordable housing developments provide low-cost funding to preserve affordability.
- Low-Income Housing Tax Credit (LIHTC)- This program provides tax credits to individuals and corporations that invest in low-income rental housing. Tax credits are sold to those with high liability and proceeds are used to create housing. Eligible activities include new construction, rehabilitation and acquisition of properties.



- California Community Reinvestment Corporation (CCRC)- The California Community Reinvestment Corporation is a multifamily affordable housing lender whose mission is to increase the availability of affordable housing for low-income families, seniors and residents with special needs by facilitating private capital flow from its investors for debt and equity to developers of affordable housing. Eligible activities include new construction, rehabilitation and acquisition of properties.

### Qualified Entities to Develop or Operate Affordable Housing

A number of non-profit corporations currently working in Orange County have the experience and capacity to assist in preserving at-risk units. These non-profits include:

- BRIDGE Housing Corporation (San Francisco)
- Civic Center Barrio Housing Corporation (Santa Ana)
- Jamboree Housing Corporation (Irvine)
- Mercy Housing Corporation (San Francisco)

### Future Housing Needs

The Regional Housing Needs Assessment (RHNA) is a key requirement for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for the 6<sup>th</sup> Housing Element projection period extending from July 2021 to October 2029. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

The RHNA for the 6<sup>th</sup> cycle was adopted by the Southern California Association of Governments (SCAG) in March 2021. The need for housing is determined by the forecasted growth in households as well as existing need due to overcrowding and overpayment. The housing need for new households is adjusted to maintain a desirable level of vacancy to promote housing choice and mobility. An adjustment is also made to account for units lost due to demolition, natural disaster, or conversion to non-housing uses. Total housing need is then distributed among four income categories on the basis of the county’s income distribution, with adjustments to avoid an over-concentration of lower-income households in any community. More information about the RHNA process may be found on SCAG’s website at <https://scag.ca.gov/rhna>.

The total assigned housing need for the City of Placentia during the 2021-2029 planning period is 4,374 units, which is distributed by income category as shown in Table 2-3. Chapter 3 includes a discussion of how the City will accommodate this need for additional housing during the planning period.

**Table 2-3– Regional Housing Needs Assessment, 2021-2029**

	Extremely Low-Income <sup>1</sup>	Very Low-Income	Low Income	Moderate-Income	Above Moderate-Income	Total
RHNA allocation <sup>2</sup>	<del>622616</del>	<del>621615</del>	680	<del>782770</del>	1,693	<del>4,3984,374</del>

<sup>1</sup> Extremely low-income need is a subset of the very-low-income (VLI) category and is assumed to be 50% of VLI need

<sup>2</sup> The RHNA projection period covers the period 6/30/2021 – 10/15/2029

Source: Regional Housing Needs Allocation, SCAG [7/1/2021](#)



It should be noted that SCAG did not identify growth needs for the extremely-low-income category in the adopted RHNA. As provided in Assembly Bill (AB) 2634 of 2006, jurisdictions may determine their extremely-low-income need as one-half the need in the very-low category.

### **2.4 Fair Housing Assessment**

~~Under State law, “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.”~~

~~There are three parts to this requirement:~~

- ~~1. Include a Program that Affirmatively Furthers Fair Housing and Promotes Housing Opportunities throughout the Community for Protected Classes (applies to housing elements beginning January 1, 2019).~~
- ~~2. Conduct an Assessment of Fair Housing that includes summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify, and an assessment of the contributing factors for the fair housing issues.~~
- ~~3. Prepare the Housing Element Land Inventory and Identification of Sites through the Lens of Affirmatively Furthering Fair Housing.~~

~~In compliance with AB 686, the City has completed the following outreach and analysis:~~

#### **Outreach**

~~As discussed in Appendix C, the City held a total of ## public meetings during the Housing Element update in an effort to include all segments of the community. Each meeting was publicized on the City’s website and meeting notices were also sent to persons and organizations with expertise in affordable housing and supportive services. Interested parties had the opportunity to interact with City staff throughout the Housing Element update process and provide direct feedback regarding fair housing issues.~~

~~The City also created a dedicated web page for the Housing Element update (<https://www.cityoflapalma.org/688/2021-2029-Housing-Element-Update>) and provided opportunities for interested persons to participate in public meetings remotely, which made it possible for those with disabilities limiting their travel to participate and comment on the Housing Element regardless of their ability to attend the meetings.~~

#### **Assessment of Fair Housing**

~~The following analysis examines geographic data regarding racial segregation, poverty, persons with disabilities, and areas of opportunity as identified by the TCAC/HCD Opportunity Areas map.~~



~~Racial segregation. As seen in Figure 2-24, the percentage of non-white population in the City is similar to the adjacent areas in Anaheim and Fullerton, but less than in Yorba Linda to the northeast. This map does not indicate any patterns of racial/ethnic concentration in the city.~~

~~Poverty. Recent Census estimates regarding poverty status of households in Placentia are shown in Figure 2-25. As seen in this map, poverty is highest (30-40%) in the southwestern portion of the city, which is also among the oldest housing and lowest property values.~~

~~Persons with disabilities. Most areas of the city have disability rates less than 10%, although some areas in the southwestern and northeastern areas have disability rates of 10-20% (Figure 2-26).~~

~~Access to opportunity. According to the 2020 California Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) Opportunity Area Map (Figure 2-27), the southern portions of Placentia are characterized as “Low resource” and “High segregation and poverty” while the central areas are “Moderate resource.” The most northerly areas of Placentia are categorized as “Highest resource” areas. These classifications appear to be correlated with racial and poverty data as well as the age of housing and property values. High Resource areas are areas with high index scores for a variety of educational, environmental, and economic indicators. Some of the indicators identified by TCAC include high levels of employment and close proximity to jobs, access to effective educational opportunities for children and adults, low concentration of poverty, and low levels of environmental pollutants, among others.~~

### **Conclusion**

~~This analysis shows that the southern portion of Placentia has higher concentrations of poverty and racial minorities than the northern areas. It appears that the primary barrier to fair housing in the City is high housing cost in newer areas, which has the effect of limiting access by lower-income households to the high opportunities and resources. There is no evidence to suggest that discrimination against racial groups or persons with disabilities is a major issue.~~

~~The Housing Plan includes several programs to encourage and facilitate affordable housing development, as well as the provision of accessory dwelling units, which can expand affordable housing opportunities for lower-income persons such as caregivers, household employees, and others working in service occupations. Program 2.1 describes actions the City will take to affirmatively further fair housing and address any issues of housing discrimination that may arise.~~



Figure 2-24—Racial Demographics—Placentia

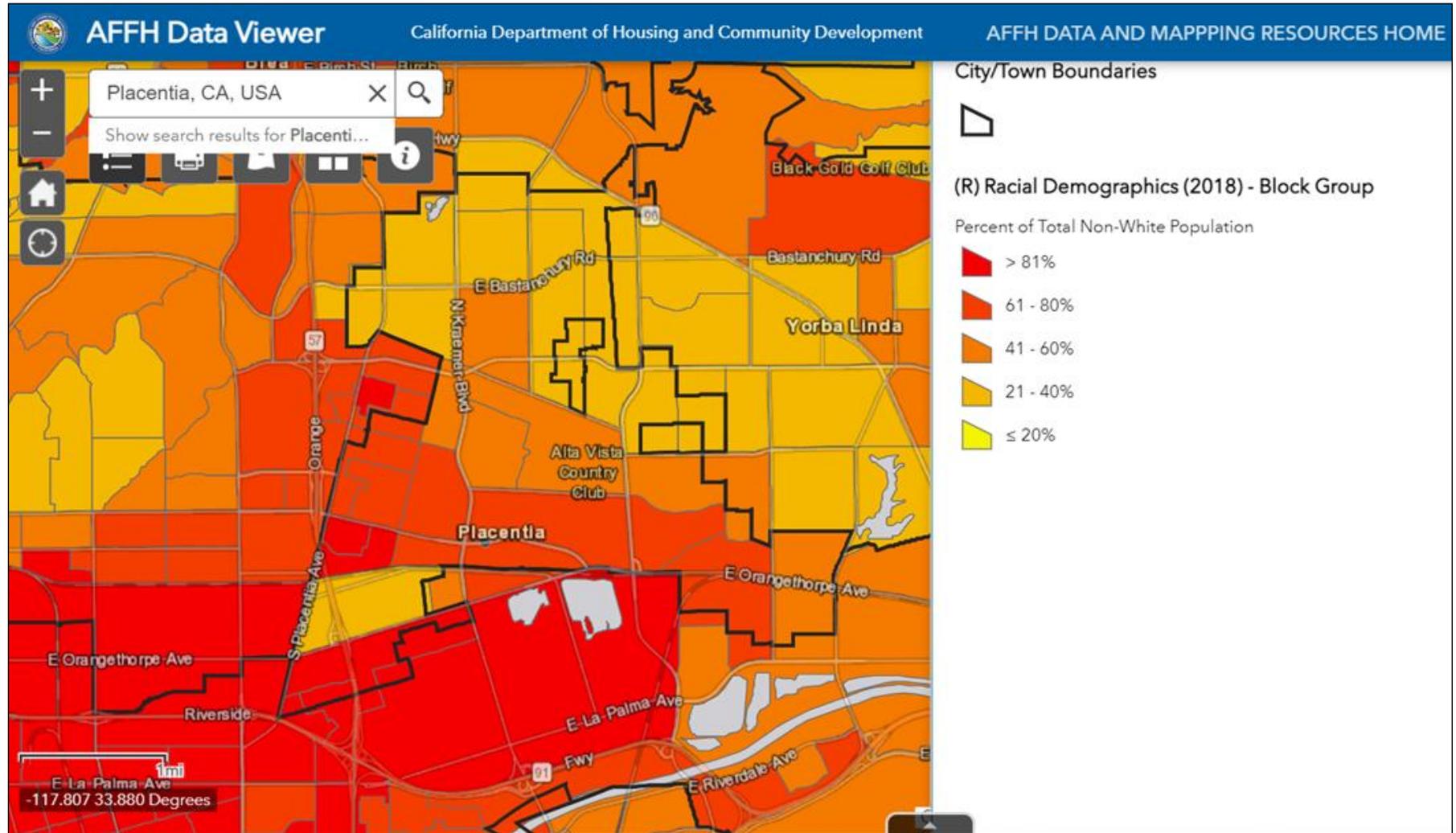




Figure 2-25—Poverty Status—Placentia

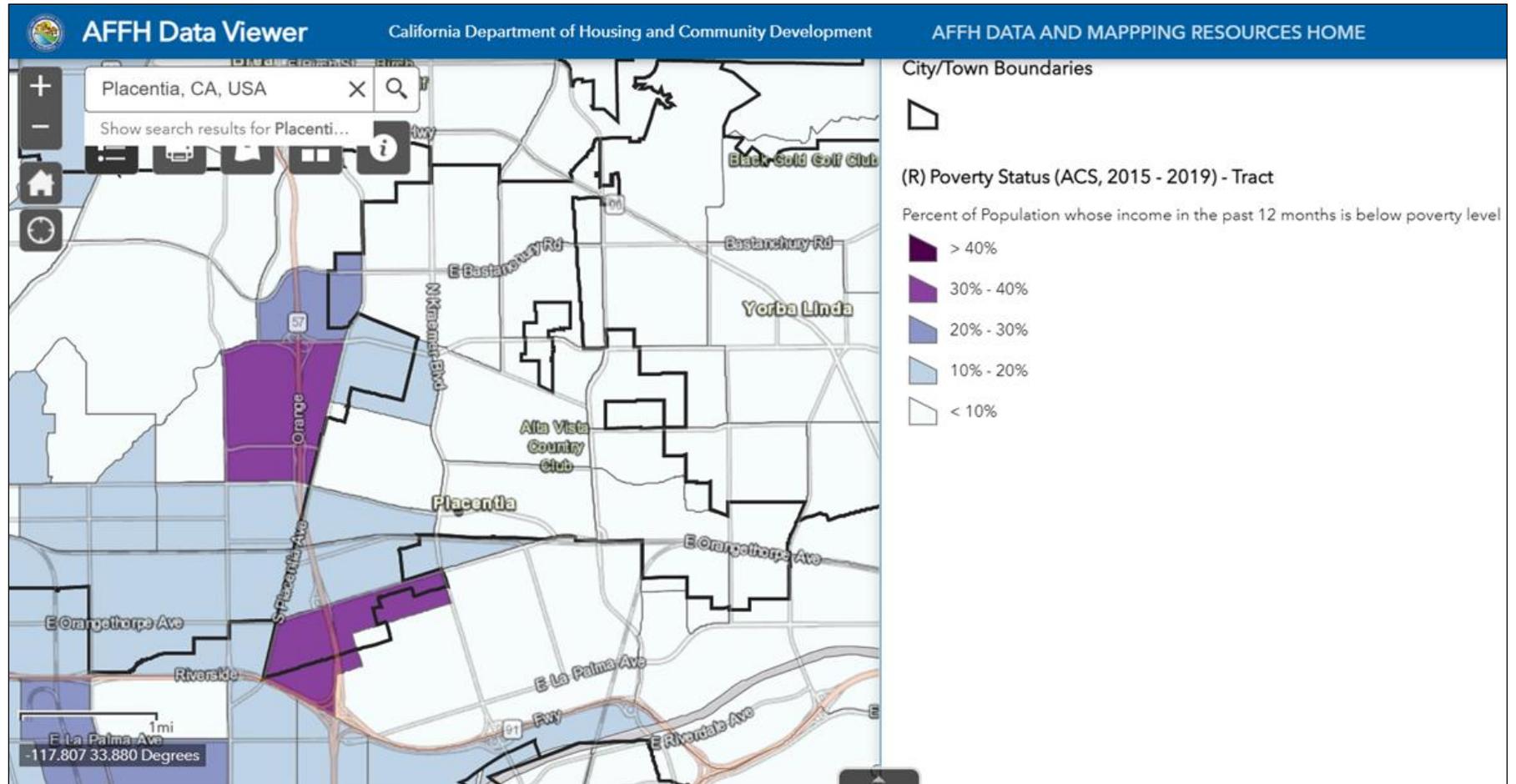




Figure 2-26—Population with a Disability—Placentia

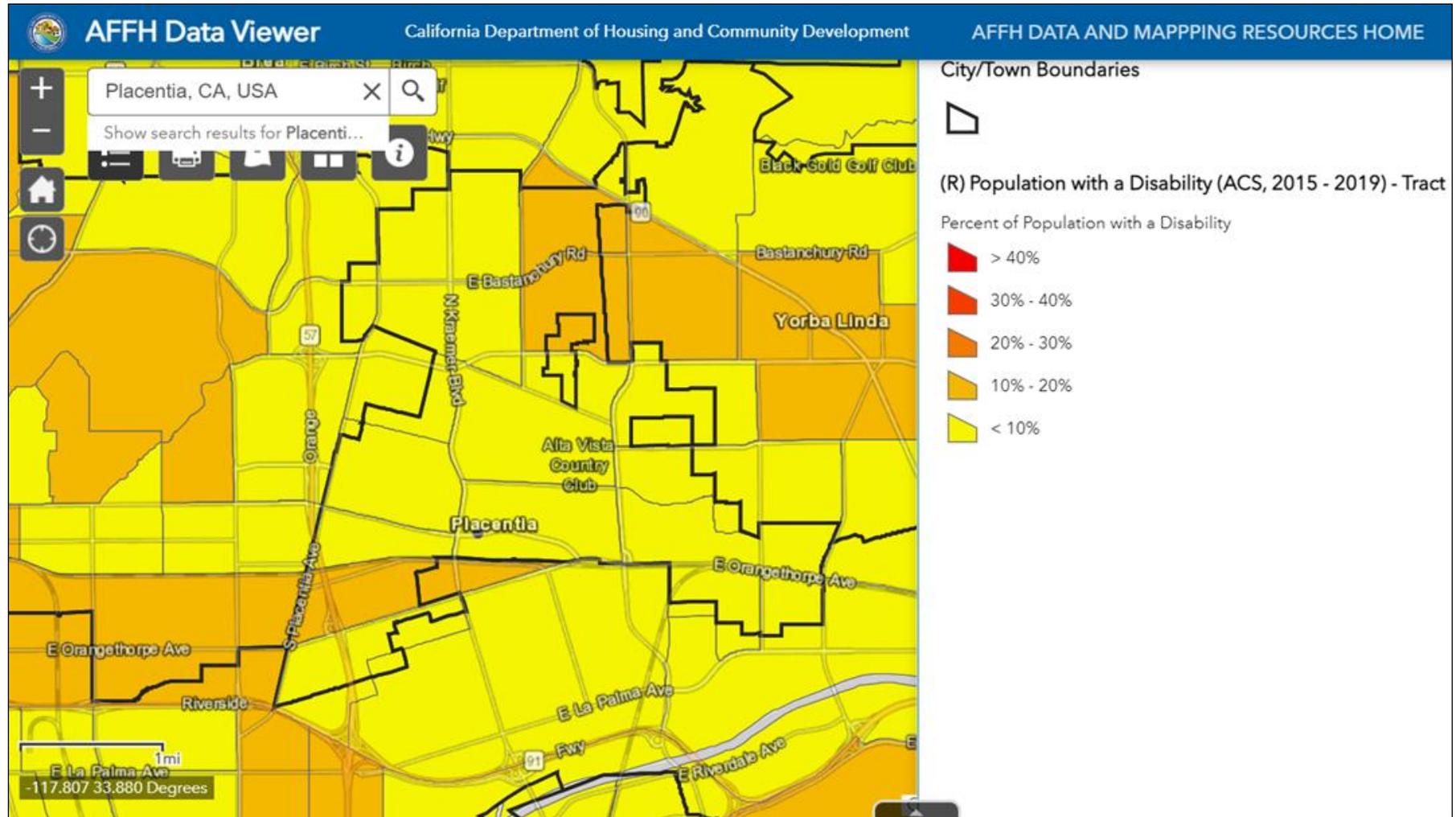
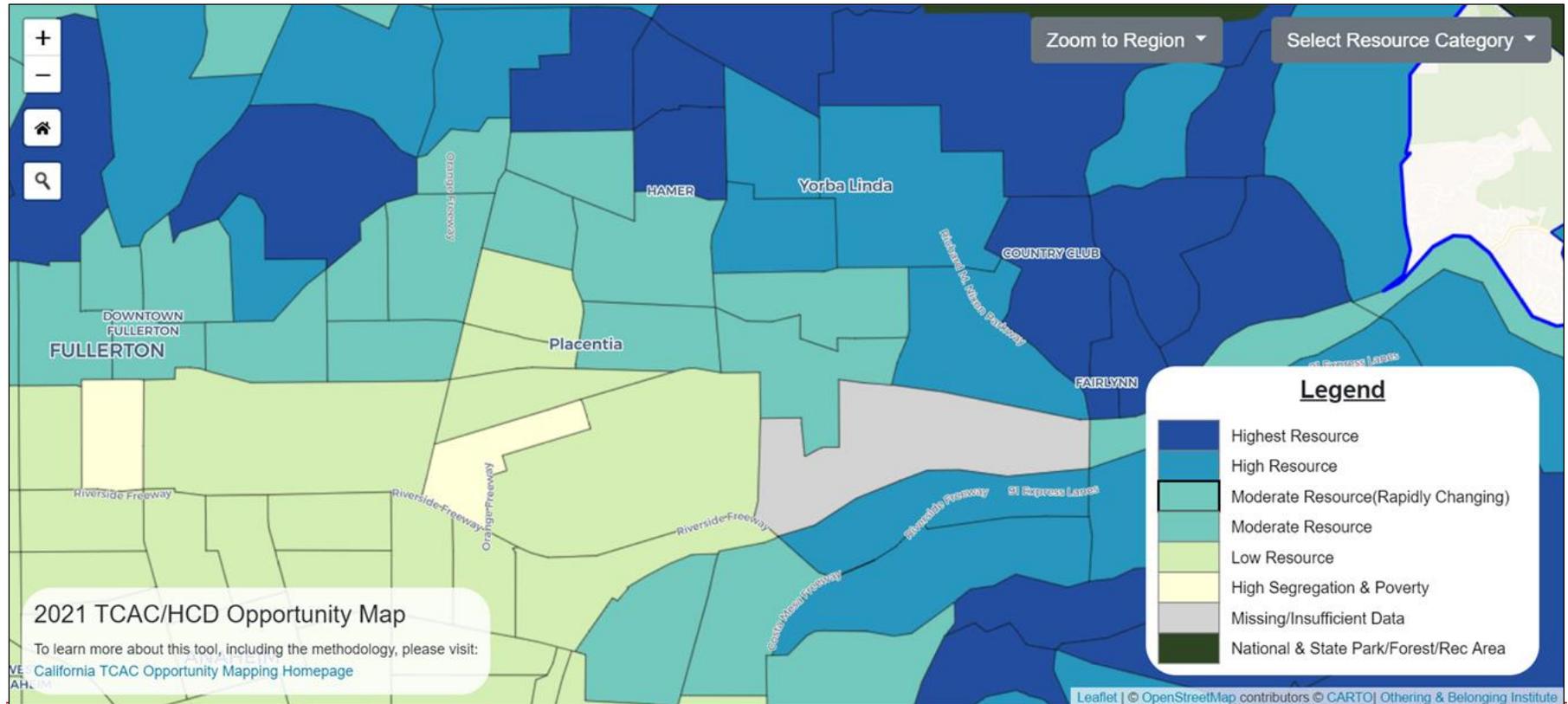




Figure 2-27—Access to Opportunity—Placentia





# Chapter 3: Resources and Constraints

## 3.1 Resources and Opportunities

A variety of resources are available for the development, rehabilitation, and preservation of housing in the City of Placentia. This chapter provides a description of the land resources to address the City’s regional housing needs for the 2021-2029 planning period (see discussion of Future Housing Needs in Chapter 2), as well as financial and administrative resources available to support the provision of affordable housing. Additionally, this chapter discusses opportunities for energy conservation that can lower utility costs and increase housing affordability.

### Land Resources

Section 65583(a)(3) of the *Government Code* requires Housing Elements to contain an “inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.” A detailed inventory of potential sites for residential development is provided in Appendix B. The results of this analysis are summarized in Table 3-1 below. The table shows that the City’s land inventory for potential residential development is not currently sufficient to accommodate the RHNA in the low- and above-moderate income categories for this planning period. Program HE-1.8 in the Housing Plan (Chapter 4) describes the specific actions the City will take to address this requirement.

**Table 3-1 – Residential Sites vs. Regional Housing Need 2021-2029**

Income Category	Very Low	Low	Moderate	Above Moderate
Approved Projects (Table B-2)	-	187	-	778
Vacant Sites (Table B-3)	-	-	496	69
Underutilized Sites (Table B-4)	786	469	257	384
ADUs	14	24	17	1
<b>Total Capacity</b>	<b>800</b>	<b>680</b>	<b>770</b>	<b>1,232</b>
RHNA	1,231	680	770	1,693
Surplus (Shortfall)	(431)	-	-	(461)

Source: City of Placentia, 2021

A discussion of public facilities and infrastructure needed to serve future development is contained in Section 3.3, Non-Governmental Constraints. There are currently no known service limitations that would preclude the level of development described in the RHNA, although developers will be required to pay fees or construct public improvements to serve new developments.



## Financial and Administrative Resources

### Community Development Block Grant and HOME Programs

Placentia participates in a consortium with the County of Orange and 12 other cities known as the Orange County Urban County Program. The Urban County consortium receives Community Development Block Grant (CDBG) and HOME funding on a formula basis from the Federal government. Funds are distributed by the County of Orange to individual jurisdictions on a competitive basis. During the 2006/07 through 2010/11 Fiscal Years, the City received \$150,000 annually in CDBG funds for housing rehabilitation but this amount declined to \$135,000 per year in FY 2012/13 and 2013/14. This City also was awarded grants for public improvements for pedestrian accessibility, Edwin T. Powell Community Center, neighborhood facilities, streets and neighborhood parks. The City has not received HOME funds in recent years but will pursue them in the future when eligible projects are identified.

CDBG funds can be used for the following activities:

- Acquisition
- Rehabilitation
- Home Buyer Assistance
- Economic Development
- Homeless Assistance
- Public Services
- Public Improvements
- Rent Subsidies

HOME funds can be used for the following activities:

- New Construction
- Acquisition
- Rehabilitation
- Home Buyer Assistance
- Rental Assistance

### Former Redevelopment Agency and the Successor Agency

As of February 1, 2012 the Redevelopment Agency (RDA) of the City of Placentia was dissolved by Governor Jerry Brown and the State Legislature. As part of the Dissolution Act, the City of Placentia designated itself as both the Successor Agency and successor housing agency to the former redevelopment agency to wind down its operations and continue local control over the former assets of the agency. The Successor Agency is able to pay for those items found to be enforceable obligations by the State Department of Finance until such time as the obligation ceases. The Successor Agency does not have any affordable housing obligations as all properties or loan receivables were transferred to the City as the housing successor agency.



### Energy Conservation Opportunities

In order to reduce the consumption of water in a landscaped area the City of Placentia has adopted a xeriscape ordinance within the Zoning Code. Primary techniques to reduce water consumption are the use of water-conserving plants, minimizing the amount of grass area, grouping plants in accordance to their watering needs, and providing an irrigation system designed to meet the needs of the plants in the landscape. All new developments are required to submit plans that comply with the ordinance.

In 1982, the City adopted an ordinance that encourages the development of energy efficient residential dwellings in order to reduce the reliance of the City's residents in commercial energy sources.

Southern California Edison, which provides electricity service in Placentia, offers public information and technical assistance to developers and homeowners regarding energy conservation. Southern California Edison also provides incentives for energy-efficient new construction and home improvements. Owners of existing homes can receive monetary incentives for purchasing Energy-star appliances or making other energy-saving improvements such as installing a whole-house attic fan.

Another strategy for building energy-efficient homes is the U.S. Green Building Council's guidelines for LEED Certification. LEED-certified buildings demonstrate energy and water savings, reduced maintenance costs and improved occupant satisfaction. The LEED for New Construction program has been applied to numerous multi-family residential projects nationwide. The LEED for Homes pilot program was launched in 2005 and includes standards for new single-family and multi-family home construction.

The City Council has authorized participation in the Home Energy Renovation Program (HERO) as provided for through the Western Riverside Council of Governments. The HERO program is financed through property assessments where the improvements are made and is not a City program, but simply a means to provide property assessed financing to eligible property owners in the City for various energy and water conservation improvements.

## 3.2 Constraints

In planning for the provision of housing, constraints to the development, maintenance and improvement of housing must be recognized, and jurisdictions must take appropriate steps to mitigate them where feasible. Local government cannot control many of these constraints, such as those related to general economic and market conditions, and constraints imposed by other governmental entities. Potential governmental and non-governmental constraints along with City efforts to reduce these constraints are discussed below.



**Governmental Constraints**

Potential governmental constraints include policies, standards, requirements, and actions imposed by various levels of government on housing development. These constraints may include land use controls, building codes, growth management measures, development fees, processing and permit procedures, and site improvement standards. State and federal agencies may also play a role in the imposition of governmental constraints; however, these agencies are beyond the influence of local government and are therefore not addressed in this analysis.

**Land Use Controls**

Land use controls include General Plan policies, zoning regulations (and the resulting use restrictions, development standards and permit processing requirements) and development fees.

**1. General Plan**

Every city in California must have a General Plan, which establishes policy guidelines for all development within the city. The General Plan is the foundation of all land use controls in a jurisdiction. Placentia’s General Plan was comprehensively updated in 2019. The Land Use Element of the General Plan identifies the location, distribution, and density of the land uses within the City. General Plan residential densities are expressed in dwelling units per acre. The Placentia General Plan identifies three residential land use designations, a Planned Community designation and a Specific Plan designation. Table 3-2 summarizes the residential land use designations and their associated acreages and density ranges.

<b>Designation</b>	<b>Description</b>	<b>Density</b>
Low Density Residential	Single family residences on individual parcels.	6 du/ac maximum
Medium Density Residential	Single-family and multi-family developments including attached and detached housing. Can include clustering and planned unit development approaches	15 du/ac maximum
High Density Residential	Multifamily residences such as apartments	25 du/ac maximum
Old Town	Mix of housing, retail, office, and/or other similar uses within a half-mile of quality public transportation	30-65 du/ac
Transit Oriented Development	Mix of high-density housing, office, retail and/or other amenities	65-95 du/ac
Mixed Use	Combination of non-residential and residential uses in the same structure or on the same site	
Residential Planned Community	Allows a variety of housing types and related commercial uses through a development plan	7.1 du/ac maximum mean
Specific Plan	Specific Plans, programs, regulations, and conditions that are unique for an area and are pertinent to maintain compatibility with surrounding areas.	Established individually for each Specific Plan

Source: City of Placentia, 2021



## 2. Zoning Code

The Zoning Code is the primary tool for implementing the Land Use Element of the General Plan. It is designed to protect and promote public health, safety, and welfare. Placentia’s residential zoning designations control both the use and development standards of specific sites and influence the development of housing. Table 3-3 summarizes the single-family residential zoning designations and their requirements. Table 3-4 summarizes the multi-family residential designations and requirements. Based on residential units approved and constructed complying with these standards, the City has determined the development standards do not unreasonably impact the cost and supply of housing nor the ability of projects to achieve maximum densities.

The Transit Oriented Development (TOD) zone was recently added to the land use categories and provides significant opportunities for high-density multi-family development.

**Table 3-3 – Summary of Single-Family Residential Zoning Requirements**

Zone	Minimum Lot Area (Sq. Ft.)	Maximum Lot Coverage	Minimum Floor Area (Sq. Ft.)	Maximum Building Height	Minimum Front Yard	Minimum Interior Side Yard	Minimum Street Side Yard	Minimum Rear Yard
R-A	20,000	40%	N/A	30'	25'	6' one side, 12' other side; corner lot line, 11'		Corner and interior lot, 5'
R-1	Interior lots 7,000; corner lots 7,500	50%	1,300	30'; accessory buildings 20'	20'-25'	6' on one side and 10' opposite side; corner lot 12'		20'
PUD	N/A	60%	N/A	35'; 30' when located adjacent to properties zoned "R-A" or "R-1," may be modified pursuant to §23.15.090	10'	None required; except there shall be a minimum 10-foot separation between buildings	5' or less, or 18' or more	10'

Source: City of Placentia Municipal Code, Chapter 23

**Table 3-4 – Summary of Multiple Family Residential Zoning Requirements**

Zone	Minimum Lot Area (Sq. Ft.)	Maximum Lot Coverage	Maximum Building Height	Minimum Front Yard	Minimum Interior Side Yard	Minimum Street Side Yard	Minimum Rear Yard
R-2	Interior lots 7,000; corner lots 8,000;	50%	35'; 30' when located adjacent to properties zoned "R-A" or "R-1," may be modified pursuant to §23.15.040	20'-25'	5'	Subject to §23.15.110	10'
R-G	Interior lots 8,000; corner lots 9,000	60%	35'; 30' when located adjacent to properties zoned "R-A" or "R-1," may be modified pursuant to §23.18.040	20'	0'-10'	Subject to §23.81.130	0'-10'
R-3	Interior lots 8,000; corner lots 9,000	60%	35'; 30' when located adjacent to properties zoned "R-A" or "R-1," may be modified pursuant to §23.21.040	15'	0'-5'	10'-15'	0'-10'
MHP	15 acres	Subject to Title 25 of the Calif. Admin. Code	2 stories or 35'	10'		25'	

Source: City of Placentia Municipal Code, Chapter 23



The single-family residential zones are R-A and R-1. As shown in Table 3-5, single-family units are permitted by-right in R-A, R-1, R-2, RPC, PUD, SP-6, SP-7, and SP-8. Single-family units are approved administratively without a public hearing, although subdivisions require a discretionary review process pursuant to the Subdivision Map Act.

The multi-family residential zones are R-2, R-G, R-3, and MHP. Multi-family dwellings are permitted subject only to Development Plan Review (DPR) by the Planning Commission in the R-2, R-G, R-3, SP-3, SP-4, SP-7 and SP-9 zones. The DPR process (Municipal Code Chapter 23.75) ensures that projects are consistent with applicable policies and standards. Multi-family developments are subject to a conditional use permit in the RPC (Residential Planned Community) zone.

**Table 3-5 – Summary of Permitted Residential Uses by Zone**

Residential Zone	Single-family	Multi-family	Mobile home Parks	Second and Accessory Units
R-A	Permitted	Prohibited	Permitted	Permitted
R-1	Permitted	Prohibited	Permitted With CUP	Permitted
R-2	Permitted	Permitted	Permitted With CUP	Prohibited
R-G	Prohibited	Permitted	Permitted With CUP	Prohibited
R-3	Prohibited	Permitted	Permitted With CUP	Prohibited
RPC	Permitted	Permitted With CUP	Permitted With CUP	Permitted
MHP	Prohibited	Prohibited	Permitted With CUP	Prohibited
PUD	Permitted	Prohibited	Permitted With CUP	Permitted
SP-3	Prohibited	Permitted <sup>1</sup>	Prohibited	Prohibited
SP-4	Prohibited	Permitted <sup>2</sup>	Prohibited	Prohibited
SP-6	Permitted	Prohibited	Prohibited	Permitted
SP-7	Permitted	Permitted	Permitted With CUP	Permitted
SP-8	Permitted	Prohibited	Prohibited	Prohibited
SP-9	Prohibited	Permitted	Prohibited	Prohibited

<sup>1</sup>Apartment projects for persons 55 years of age or older.

<sup>2</sup>Apartments of medium density residential setting reserved for lower-income families for a minimum of 30 years.

Source: City of Placentia Municipal Code Chapter 23

### Transit Oriented Development (TOD) Zone

In 2017 the City adopted Municipal Code Chapter 23.111 Transit Oriented Development Packing House District Development Standards, which encompasses a former manufacturing area located south of downtown and immediately adjacent to a Metrolink commuter rail station<sup>3</sup> currently under construction. The TOD zone is approximately 110 acres in size and runs south from the Burlington Northern Rail line to Orangethorpe Avenue, and east from State Route 57. The TOD area provides for residential densities up to 95 dwelling units per acre, mixed-use residential-commercial, and increased amenities to encourage use of the commuter rail station. Additional development standards in the TOD zone are shown in Table 3-6.

Since adoption of the TOD zone in 2017, several high-density residential projects have been approved at densities ranging from 73 to 89 units/acre, or up to 93% of the

<sup>3</sup> <https://www.placentia.org/705/Metrolink-Station-and-Parking-Structure>



allowable density, indicating that the development standards do not pose a constraint to development (see Table B-2 in Appendix B).

### **Old Town Placentia Revitalization Plan Regulations**

In 2017 the City adopted Municipal Code Chapter 23.112 Old Town Placentia Revitalization Plan Development Standards, which covers the Old Town area immediately north of the TOD zone and the Metrolink commuter rail line. The purpose of the Old Town regulations is to facilitate the enhancement of the city’s historic core, characterized by its small-scaled village atmosphere, shopfront architecture, mix of uses and inviting streetscapes.

The Old Town district is divided into five subareas and one overlay zone as shown in 0:

- Main Street (MS)
- Village (V)
- Mixed-Use (MU)
- High-Density Residential (HDR)
- Public Facilities (PF)
- R-2 Overlay Zone

Multi-family residential development, either stand-alone or mixed-use, is allowed in the HDR subarea and residential is allowed on the upper floors in all subareas except Public Facilities. Maximum densities are 25 units/acre in the Main Street subarea, 35 units/acre in the Village subarea, 55 units/acre in the Mixed-Use subarea, and 65 units/acre in the High-Density Residential subarea. Allowable building heights range between 2 and 4 stories depending on location.



Table 3-6– TOD Development Standards		
	Standard	Notes
<b>Architectural Review</b>	High quality, 360 degree, architectural and urban design is required. All new projects will require architectural review by a third party architectural expert, selected by the city.	Third party review costs are the responsibility of the applicant.
<b>Building Placement Regulations</b>		
<b>1. Density</b>	65 dwelling unit/acre minimum and 95 dwelling units/acre maximum	Density shall be calculated using gross lot size, prior to any required right-of-way dedications. Dedications shall be required along Crowther Avenue.
<b>2. Block Length and Lot Size Requirements.</b> Each project along Crowther Avenue shall create an active and inviting environment for pedestrians.		
a. Maximum Building Length without Breaks in Building Massing	350 ft.	Breaks in building massing mean courtyards, plazas, outdoor dining, etc. These should be open from ground to sky and constitute a true break in the building massing.
b. Lot Depth	No minimum lot depth	Integrated developments and lot consolidations are encouraged with lot orientation fronting on Crowther Avenue, and where possible, with parcels extending from Crowther to the railroad right-of-way.
c. Minimum Lot Size	20,000 square feet	
<b>3. Setbacks.</b> Minimum setbacks required and, where noted, maximum setbacks established, except where a frontage type standard allows exceptions or establishes different requirements. Setbacks are measured from property line after any required dedications. Fire department requirements supersede any setback listed below.		
a. Setback From Railroad Track	0 feet	10 ft. from rear ROW preferred by BNSF for above ground structures. Applicants should consider access to rear portion of new development.
b. Front Yard Setback	3 ft. min./15 ft. max.	
c. Side Yard Setback	0 feet, or 10 ft. when adjacent to a property containing residential uses.	
d. Rear Yard Setback	10 ft.	
e. Street Side Yard Setback	5 ft. min./15 ft. max.	



Table 3-6– TOD Development Standards		
	Standard	Notes
<b>4. Projections</b>		
<b>a. Allowable Setback Projections.</b>		
i. Ground Floor:		
• Awnings and canopies over windows: 60 inches;		
• Sun shade structures: 15 feet;		
• Bay windows: 60 inches (not wider than 10 feet);		
• Cornices, belt courses, and similar architectural features: 12 inches;		
• Eaves, roof overhangs: 30 inches; and		
• Uncovered porches, decks and landings (may be covered by arbors or trellises): 10 feet.		
ii. Above Ground Floor. Awnings, galleries, balconies, bay windows: 48 inches.		
iii. Art, as determined by the approval of the public art component of the project.		
iv. For signs, see Sign Regulations, § <a href="#">23.110.050</a> .		
v. All projections must maintain a minimum of 8 feet vertical height from ground.		
<b>b. Public right-of-way encroachments require approval of an encroachment permit.</b>		
<b>5. Building Height, Rooftop Amenities, Frontages, and Ground Floor</b>		
a. Building Height	3 stories minimum, 35 ft. minimum, 5 stories maximum, not to exceed 68 ft.	
b. Frontage Requirements. In order to support the pedestrian environment, building frontages onto streets and open spaces shall be maximized. No visible parking is permitted along frontages. A minimum of 75% of the site frontage shall be occupied as building frontage. A section of blank wall shall not exceed 20 linear feet without being interrupted by a window or entry or other façade treatment.		
c. Where commercial uses are required on ground floors, those commercial uses shall have a minimum 15 ft. floor to ceiling height.		
<b>6. Provision of Common Open Space (Residential Portion Only)</b>		
a. Amount per residential use	50 sf/unit for residential units; 50 sf/unit for 5 or more live work units.	Up to 75% of this requirement can be fulfilled by providing a public plaza in lieu of private common open space.
b. Types of Common Open Space Permitted	• Common open space can be active or passive but must be accessible to all non-residential tenants (i.e., employees and employers) and residential residents.	
	• Required setbacks may not be counted as common open space, except that rear yards counted as meeting the requirement for live/work units.	
	• Common open space shall be fully landscaped and requires an approved landscape plan.	



Table 3-6– TOD Development Standards		
	Standard	Notes
	<ul style="list-style-type: none"> <li>Examples may include: courtyards, clubhouses with accompanying landscaped areas, swimming pools, plazas, greens, parks, playgrounds, picnic areas, outdoor seating.</li> </ul>	
c. Rooftop Amenities	<ul style="list-style-type: none"> <li>Rooftop amenities are permitted if they provide additional recreational or common open space activities for the residents of the building.</li> </ul>	
	<ul style="list-style-type: none"> <li>50% of the rooftop amenities (structures and active recreation amenities) may count towards the square footage requirement for either private or common open space.</li> </ul>	
	<ul style="list-style-type: none"> <li>Rooftop amenities, such as and not limited to, clubhouses, swimming pools, tennis courts, open space areas, fitness centers, are permitted to project 16 ft. above the maximum height limit if integrated into the overall design of the project and the maximum rooftop building coverage is limited to 30% of the rooftop floor area.</li> </ul>	
	<ul style="list-style-type: none"> <li>Roof top amenities shall be set back from the building edge such that no more than 20% of the rooftop structure can be visible from the primary public right-of-way at centerline of the street.</li> </ul>	
	<ul style="list-style-type: none"> <li>Rooftop amenities are intended for the use of building residents.</li> </ul>	
d. Courtyard Common Open Space Requirements	<ul style="list-style-type: none"> <li>Courtyards shall be designed as a central courtyard or as partial, multiple, separated or interconnected courtyards.</li> </ul>	
	<ul style="list-style-type: none"> <li>Minimum courtyard dimension shall be 40 ft. when the long axis of the courtyard is oriented EW and 30 ft. for a NS orientation. The courtyard proportion is 1:1 between its width and height for at least 2/3 of the court’s perimeter. As long as total open space requirement is met, this ratio could be modified by up to 10%.</li> </ul>	
	<ul style="list-style-type: none"> <li>When there are 2 or more courtyards, they shall be connected to each other.</li> </ul>	
	<ul style="list-style-type: none"> <li>The area required for first level patios shall not be deducted from the overall courtyard area.</li> </ul>	
<b>7. Provision of Private Open Space (Residential Portion Only)</b>		
a. Live Work	64 sf/unit	6 ft. min. in any direction; the total of 64 sf must be provided as 1 private



Table 3-6– TOD Development Standards		
	Standard	Notes
		open space area, not broken up into smaller sizes.
b. Residential-Attached & Multifamily	64 sf/unit	6 ft. min. in any direction; the total of 64 sf must be provided as 1 private open space area, not broken up into smaller sizes.
<b>8. Parking</b>	<b>Standards</b>	<b>Applicable Land Uses</b>
a. Retail – spaces per 1,000 sf	2 min./4 max.	Accessory retail, antique, artisan, general retail, grocery, retail complex, personal services
b. Eating and Drinking Establishments – spaces per 1,000 sf	5 min./10 max.	Bar/tavern, restaurant, brewery, etc.
c. Outdoor Dining on Private Property	0	<ul style="list-style-type: none"> <li>• Outdoor dining is encouraged and shall be incorporated as part of the overall design of the building or project.</li> <li>• Outdoor dining may project into required setbacks.</li> <li>• No parking is required for outdoor dining unless the total outdoor dining square footage is greater than the total interior dining area. In this circumstance, project must provide parking for the amount over the interior square footage.</li> <li>• Acceptable barriers for defining outdoor dining areas shall include fences, railings, and planter boxes.</li> </ul>
d. Specialty Goods & Foods– spaces per 1,000 sf	2 min./4 max.	
e. Entertainment & Recreation – spaces per 1,000 sf	6 min./10 max.	Health/fitness, playgrounds, studios, theatres cannot be stand alone.
f. Commercial Goods – spaces per 1,000 sf	2 min./4 max.	
g. Civic & Cultural, including Libraries and Museums – spaces per 1,000 sf	3 min./no max.	
h. Office Professional – spaces per 1,000 sf	2 min./4 max.	



Table 3-6– TOD Development Standards		
	Standard	Notes
i. Personal Services	3 min./no max.	
j. Live Work	1 min./1.5 max.	
k. ATM	0	
l. Lodging – B&B	1 per sleeping room.	No assembly space permitted.
m. Lodging – Hotel	1 per sleeping room, plus 1 space for every 75 sf of assembly area.	
<b>Residential</b>		
n. Spaces per studio unit	1 min./1 max.	
o. Spaces per 1 bed unit	1 min./1.5 max.	
p. Spaces per 2 bed unit	1.5 min./2 max.	
q. Spaces per 3 bed unit	2 min./2.5 max.	
r. Guest spaces per 10 units	2 min./3 max.	
s. Mixed Use	Parking shall meet the requirements for individual land uses. Residential parking shall be separated from non-residential parking and easily accessible through a controlled mechanism.	Reduced parking may be permitted through a parking study.
<b>Other</b>		
t. Bike Parking – Short-Term	Residential: 1 resident bicycle parking space for every 5 residential units, or portion thereof; Nonresidential: 1 bicycle parking space for every 5,000 sf, or portion thereof, of nonresidential floor area.	
u. Bike Parking – Long-Term	Residential: 2 bicycle storage units for every 5 dwelling units for the first 20, and 1 for every 5 additional units, or portion thereof; Nonresidential: Any establishment with a parking structure and a minimum of 10,000 sf of non-residential space shall provide long-term bicycle parking at a minimum ratio of 1 space per 20 vehicle spaces.	
v. Electric Vehicle Charging Stations.	Minimum 10% of project’s parking spaces must provide EV Level 2 charging stations. Alternatively, 5% of total spaces if installing DC fast charging stations.	
w. Transit Station or Terminal.	As per director of development services in coordination with transportation authority.	
x. Telecommunication Facility	1 space to service facility.	



<b>Table 3-6– TOD Development Standards</b>		
	<b>Standard</b>	<b>Notes</b>
y. Surface Parking.	Surface parking is permitted as long as not visible from public street and is fully landscaped and screened from public view.	
z. Parking Structure.	Structure parking permitted only if integrated into overall design of building and “wrapped” with the building, such that the parking area is not visible from any portion of the front, sides, rear or interior courtyards of the project.	
aa. Podium Parking.	Permitted if fully integrated into a development with a “wrapped” parking structure.	
bb. Underground Parking.	Permitted if fully integrated into the design of the development.	
cc. Parking Reduction.	Applicants may apply for parking reduction before the planning commission for residential and mixed use projects up to a maximum reduction of 25% through a parking demand study or shared parking analysis. One such incentive could include a Zip car or shared car plan.	



Table 3-7– Old Town Placentia Revitalization Plan Development Standards						
Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
<b>Residential Density</b>						
1. Density (max du/ac)	25	35	55	65	NA	Density shall be calculated using gross lot size, prior to any required right-of-way dedications.
<b>Setbacks.</b> Minimum setbacks required and, where noted, maximum setbacks established, except where a frontage type standard allows exceptions or establishes different requirements. Setbacks are measured from property line after any required dedications. Fire department requirements supersede any setback listed below.						
1. Setback from Railroad Track	NA	NA	NA	0 ft.	0 ft.	10' from rear ROW preferred by BNSF for above ground structures. Applicants should consider access to rear portion of new development.
2. Front Yard Setback (min-max)	0 ft.	0-5 ft.	5-15 ft.	5-15 ft.	NA	All setback areas facing a street or alley not devoted to walkways and driveways shall be properly landscaped and maintained in compliance with PMC Ch. 23.77. In the R-2 overlay zone, the front yard setback shall be 15'.
3. Front Yard Setback for “through lots” and cross-alley developments in the R-2 overlay, fronting Alta and Main. See definitions section.	15 ft.	15 ft.	15 ft.	NA	NA	
4. Side Yard Setback	0 ft.	0 ft.	0 ft.	0 ft.	NA	
5. Side Yard Setback for “through lots” and cross-alley developments in the R-2 overlay, fronting Alta and Main. See definitions section.	0-5 ft.*	0-5 ft.*	NA	0 ft.	NA	*Less than 5' setback adjoining an R-2 use requires approval from adjoining property owner of said R-2 use.
6. Rear Yard Setback (min-max)	0-15 ft.	0-15 ft.	0-15 ft.	0 ft.	NA	



Table 3-7– Old Town Placentia Revitalization Plan Development Standards						
Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
7. Street Side Yard Setback (min-max)	0 ft.	0-5 ft.	5* ft.	5-15 ft.	NA	*Refers to Chapman Avenue setback.
<b>Projections and Encroachments</b>						
1. Allowable Setback Projections	a. Ground Floor: <ul style="list-style-type: none"> <li>i. Awnings and canopies over windows: 60”;</li> <li>ii. Barriers for defining outdoor dining areas such as fences, railings, planter boxes: as needed to encompass outdoor dining area;</li> <li>iii. Sun shade structures: 15’;</li> <li>iv. Bay windows: 60” (not wider than 10’);</li> <li>v. Cornices, belt courses, and similar architectural features: 12”;</li> <li>vi. Eaves, roof overhangs: 30”;</li> <li>vii. Uncovered porches, decks and landings (may be covered by arbors or trellises): 10’.</li> </ul> b. Above Ground Floor. Awnings, galleries, balconies, bay windows: 48” c. Art, as determined by the approval of the public art component of the project. d. For signs, see sign regulations, § <a href="#">23.112.070</a> . e. All projections must maintain a minimum of 8’ vertical clearance from ground.					
2. Public Right-of-Way Encroachments (all require approval of an encroachment permit)	a. Art, as determined by the approval of the public art component of the project. b. For signs, see sign regulations, § <a href="#">23.111.070</a> . c. Outdoor dining is allowed by approval of the director of development services and director of public works or their designees and may require Alcoholic Beverage Control Board (ABC) approval. Approval is pursuant to the outdoor dining permit and guidelines.					
<b>Heights, Rooftop Amenities, Frontages, Lot Sizes</b>						
1. Building Height	2-Story Area: 2 stories, 30’ 3-Story Area: 3 stories, 40’ 4-Story Area: 4 stories, 55’	2 min/3 max stories, 40’	3 min/4 max stories, 60’	3 min/4 max stories, 55’	5 stories, 65’	See “Old Town zoning map” for height subareas. New stories built on top of existing buildings shall be fully integrated into the design of the existing building.
2. Minimum Lot Size required for a development at or over 3 stories.	0	8,000 sf*	10,000 sf	10,000 sf	0	*Developments on lots smaller than 8,000 sf can be considered if they are contiguous to parcels with proposed or approved new developments and are



**Table 3-7– Old Town Placentia Revitalization Plan Development Standards**

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
						developed with a zero lot line scenario or similar concept. The development on the smaller lot must complement and enhance the contiguous development and further the goals of this chapter.
3. Ground Floor Height measured from finished floor to ceiling (min)	15 ft.	15 ft.	15 ft.	NA	NA	
4. Frontage Requirements	In order to support the pedestrian environment, building frontages onto streets and open spaces shall be maximized. No visible parking is permitted along frontages. A minimum of 75% of the site frontage shall be occupied as building frontage. A section of blank wall shall not exceed 20 linear feet without being interrupted by a window or entry or other façade treatment.					
5. Rooftop Amenities	In multifamily residential and mixed-use residential projects, rooftop amenities, such as and not limited to, clubhouses, swimming pools, tennis courts, open space areas, fitness centers, are permitted to project 16’ above the maximum height limit if integrated into the overall design of the project and the maximum rooftop building coverage is limited to 30% of the rooftop floor area. Rooftop amenities shall be set back from the building edge such that no more than 20% of the rooftop structure can be visible from the primary public right-of-way at centerline of the street. Rooftop amenities are intended for the use of building residents. Rooftop amenities do not count as a “story” or “floor.”					
6. Height Exceptions	Non-habitable building features such as chimneys (up to 6’ in width), cupolas, flagpoles, monuments, steeples, roof screens, equipment, and similar structures, covering no more than 10% of the top floor roof area to which they are accessory, may exceed maximum permitted height standards by up to 8’.					
7. Building Orientation	New commercial or mixed use construction must orient the principal façade onto Bradford, Santa Fe or Chapman Avenue or Walnut Avenue. In the mixed use subarea, new buildings must be oriented toward Bradford and Chapman.			NA	NA	
8. Building Façade for building located at 102 S. Bradford Avenue (at Chapman)	The building façade of this building shall be preserved and integrated into the new design of any new development proposed on this site. This includes the façade along Bradford Ave (including the tower and the front section containing the large round window opening) and					



Table 3-7– Old Town Placentia Revitalization Plan Development Standards						
Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
	up to and including the façade (containing the stained glass windows) along Chapman Avenue. The Chapman Avenue façade preservation can end at the point where the planes of the two sections of that façade meet (where the east/west oriented portion of the building meets the north/south oriented portion of the building). The preservation does not necessarily have to include the small vestibule. The proposed architectural design of any new development shall be reviewed by a preservation architect; the selection of such preservation expert shall be approved by the city.					
<b>Provision of Common Open Space (Residential Only)</b>						
1. Amount per Residential Use	a. 50 sf/unit for residential units; b. 50 sf/unit for 5 or more live work units.					
2. Types of Common Open Space Permitted	a. Common open space can be active or passive but must be accessible to all nonresidential tenants (i.e., employees and employers) and residential residents. b. Required setbacks may not be counted as common open space. c. Common open space shall be fully landscaped and requires an approved landscape plan. d. Examples may include: courtyards, clubhouses with accompanying landscaped areas, swimming pools, plazas, greens, parks, playgrounds, picnic areas, outdoor seating.					
3. Rooftop Amenities	1. Rooftop amenities are permitted if they provide additional recreational or common open space activities. 2. Amenities, such as and not limited to, clubhouses, swimming pools, tennis courts, open space areas, fitness centers, are permitted to project 16' above the maximum height limit if integrated into the overall design of the project and the maximum rooftop building coverage is limited to 30% of the rooftop floor area. Roof top amenities shall be set back from the building edge such that no more than 20% of the rooftop structure can be visible from the primary public right-of-way at centerline of the street. Rooftop amenities are intended for the use of building residents. 3. 50% of the rooftop amenities (structures and active recreation amenities) may count towards the square footage requirement for either private or common open space. 4. Rooftop buildings supporting recreational activities may cover a maximum of 30% of the rooftop area and may project above the maximum height limit by 16'.					



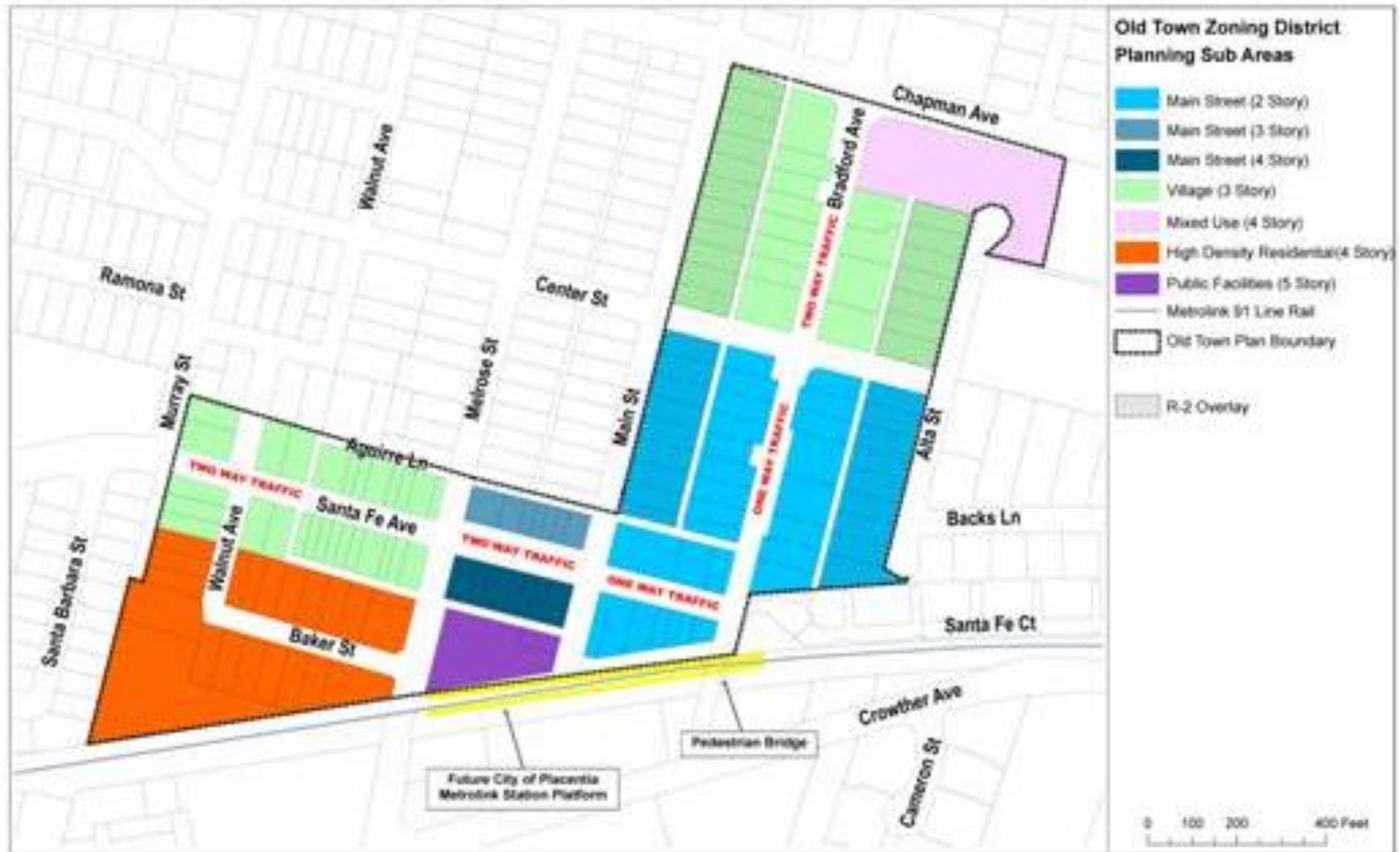
Table 3-7– Old Town Placentia Revitalization Plan Development Standards						
Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
4. Courtyard and Common Open Space Requirements	1. Courtyards shall be designed as a central courtyard or as partial, multiple, separated or interconnected courtyards. 2. Minimum courtyard dimension shall be 40' when the long axis of the courtyard is oriented EW and 30' for a NS orientation. The courtyard proportion is 1:1 between its width and height for at least 2/3 of the court's perimeter. As long as total open space requirement is met, this ratio could be modified by up to 10%. 3. When there are 2 or more courtyards, they shall be connected to each other.					
<b>Provision of Private Open Space (Residential and Live/Work Only)</b>						
Amount per Residential Unit	64 sf/unit					6' min. in any direction; the total of 64 sf must be provided as one private open space area, not broken up into smaller sizes.
<b>Shopfronts</b>						
The following are specific guidelines for shopfronts in the Old Town area: 1. 12' to 16' tall, as measured from the adjacent sidewalk. 2. The corresponding storefront(s) opening(s) along the primary frontage shall comprise 65% of the 1st floor wall area facing the street and not have opaque, stucco or reflective glazing. 3. Storefronts may be recessed from the frontage line by up to 10'. 4. "Bulkheads," which are a segment of wall that transitions between the window opening(s) and the adjacent grade, are also encouraged. The bulkhead shall be between 24" and 36" tall (aluminum storefront or spandrel panel may not substitute for a bulkhead).						
<b>Architectural Styles</b>						
<b>1. Main Street Commercial</b> Multi-story façades are typically divided into base, body and top with the ground floor taller than the shorter upper floor which is finished by a significant parapet. The ground floor has recessed entries and any expansive glass is interrupted by structural columns with transoms to allow light to penetrate deep into the interior. Upper floor windows are smaller with vertical windows directly relating to the ground floor openings.					Style of architecture required in Main Street subareas	



Table 3-7– Old Town Placentia Revitalization Plan Development Standards						
Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
<p><b>2. Mission Revival</b>                      Prominent features of the style include red clay tile roofs, use of balconies, smooth-stuccoed exterior walls usually painted white, arched openings, colorful tile work and elaborate landscaping. The buildings frequently have courtyards.</p>						Choices of architecture for the following: <ul style="list-style-type: none"> <li>• Village subarea</li> <li>• Mixed use subarea</li> <li>• High density residential subarea</li> </ul>
<p><b>3. Spanish Colonial</b>                      Typical features include a low-pitched roof with little or no eave overhang, a red-tiled roof, perhaps a prominent rounded arch over a door, window or porch, a stucco wall surface, and usually an asymmetrical façade. The features elaborate molded ornament around doors and windows, polychrome tile at ingresses and wrought iron grilles and balconies.</p>						This style of architecture permitted only in high density residential subarea



Figure 3-1 – Old Town Zoning District Planning Subareas





### Parking Requirements

Residential off-street parking standards are regulated by Chapter 23.78 of the Municipal Code and are summarized in Table 3-8 summarizes the residential parking requirements in Placentia. While these requirements are typical of other jurisdictions in the area, they can pose a parking requirements do not constraint on the development of housing by increasing development cost and reducing achievable densities directly. In particular, the current requirement of two parking spaces for each unit in the R-3 (High Density Multi-family) district can act as a constraint on small units. To address this constraint, Program 1.17 in the Housing Plan includes a Code amendment to reduce the parking requirement for studio and 1-bedroom units in the R-3 district to one space. However, parking requirements may reduce the amount of available land for residential development.

**Table 3-8 – Residential Parking Requirements**

Type of Residential Development	Required Parking Spaces (Off Street)
R-A and R-1 (4 or fewer bedrooms)	2 (2 in garage) per unit
R-A and R-1 (5 or more bedrooms)	3 (3 in garage) per unit
R-G	2 (1 in garage) per unit; plus 10% of said total for guest parking; carports allowed for multiple dwellings
R-3	2 (1 in garage) per unit; plus 15% of said total for guest parking; carports allowed for multiple dwellings
PUD (bachelor and 1 bedroom)	2 (1 in garage) per unit
PUD (2 or more bedrooms)	3 (2 in garage) per unit; 1 recreational vehicle space, for each 10 units
Mobile Home Parks	2 spaces per mobile home lot (may be in tandem), plus 1 additional space per every 5 mobile home lots provided as guest parking. In addition, there shall be provided 1 boat or travel trailer space for every 5 mobile home lots
Boardinghouses, fraternities, and group living quarters	1 space per resident
Rest Homes	1 space for each 4 beds, plus 1½ spaces per employee
Second Residential Units	1 space in addition to that required for the primary unit; shall not be located within the required front yard setback and may be open

Source: City of Placentia Municipal Code Title 23, Sect. 78.030 et. seq.

There are no specific criteria for allowing carports in multi-family housing. When carports are utilized, the required dimensions of a carport space shall be measured from the interior of the carport. The carport shall cover the entire length of the space and shall be separated from open parking spaces by a landscaped buffer.

The off-street parking requirements for multi-family housing are the same regardless of unit size. To ensure that the City’s parking requirements do not pose future constraints on development of smaller units, the Housing Plan (Chapter 4) includes Program 1.17 to review and revise parking requirements to mitigate any identified constraints.

### Density Bonus

In order to encourage the construction of affordable housing, State law established requirements for cities to allow increased density and other incentives when projects include affordable units. The City of Placentia has adopted a Density Bonus Ordinance



(Chapter 23.23 of the Municipal Code) describing standards and procedures for providing density bonus upon request from the applicant. Recent State legislation has modified density bonus requirements; therefore, Program 1.11 in the Housing Plan (Chapter 4) includes a commitment to process an amendment to City regulations for density bonus and incentives consistent with State law.

### Housing for Persons with Disabilities

The U.S. Census Bureau defines persons with disabilities as those with a long-lasting physical, mental or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

Residential care facilities. ~~The City~~ Municipal Code Sec. 23.81.040 allows residential care facilities for 6 or fewer persons by-right in any single-family residence in an R-A, R-1 or R-2 zone. Residential care facilities provide 24-hour supervised non-medical care.

Group dwellings including residential care facilities for 7+ persons, nursing homes, rest homes, and other special needs facilities are permitted in residential and commercial districts subject to approval of a use permit.

Placentia's Zoning Code allows group housing and residential care facilities for 7 or more persons, including nursing homes, intermediate care facilities and assisted care facilities, in the C-2 zone with a conditional use permit, senior housing and facilities in Specific Plan 3 area as a permitted use, and independent living facilities, assisted living facilities, and skilled nursing facilities in Specific Plan 9 area as a permitted use. One large residential care facility was proposed in recent years and received approval of a use permit.

Specific Plan 3 area developments are subject to the requirements found in Chapter 23.103 (Specific Plan 3) of Placentia Municipal Code. Specific Plan 3 area contains requirements for board and care facilities for persons 62 years of age or older, with private bathrooms, central kitchen facilities and services which include transportation, activities programs, housekeeping, linen and laundry service and full-time staff supervision; and apartment projects for persons 55 years of age or older, which contain a private entry and individual kitchen, but are no larger than two bedrooms, where two bedroom units do not exceed 50 percent of the total number of units.

Specific Plan 9 area developments are subject to the requirements found in Chapter 23.109 (Specific Plan 9) of Placentia Municipal Code. A deed restriction for this area requires that for the life of the structures at least one resident of each independent living unit shall meet the minimum age requirement of 55 years.

Definition of Family. The Municipal Code defines *family* as “an individual or two or more persons related by blood, marriage or adoption, or a group of not more than six persons, excluding servants, who are not related by blood, marriage or adoption, living together as a single housekeeping unit in a dwelling unit.” The Housing Plan



(Chapter 4) includes Program 2.3 to process a Municipal Code amendment to revise this definition consistent with current law.

Separation requirements. To further accommodate housing for persons with disabilities, there are no maximum separation or concentration requirements for residential care facilities. The City considers parking requirements for residential care facilities on a case-by-case basis.

Program 2.3 in the Housing Plan includes a commitment to update City regulations related to persons with disabilities consistent with State law.

### Reasonable Accommodation Procedures

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 persons with disabilities an equal opportunity to use and enjoy a dwelling.

Zoning Code Chapter 23.59 establishes the process by which persons with disabilities may request a reasonable accommodation and provides for administrative review and approval by the Director of Development Services. Any person with a disability may submit an application for reasonable accommodation to the director describing the accommodation requested, the provision of the Zoning Code, policy or procedure from which modification is being requested, the basis for the claim that the applicant is considered disabled under the Federal Fair Housing Amendments Act of 1988 or the California Fair Employment Housing Act; and an explanation of why the accommodation is reasonable and why the accommodation is necessary to afford the applicant an equal opportunity to use and enjoy a specific dwelling in the city. No fee is charged by the City for a reasonable accommodation application.

In the event that there is no approval sought other than the request for reasonable accommodation, notice of the reasonable accommodation application is mailed to the owners of adjacent properties. If the reasonable accommodation request is made in conjunction with some other approval, permit or entitlement, the notice is provided along with the notice of the other proceeding.

Within 5 days of submittal the director determines whether the application of complete and notifies the applicant if additional information is needed.

In making a determination about the reasonableness of a requested accommodation, the following factors are considered by the director:

- Whether the accommodation is reasonable considering the nature of the applicant's disability, the surrounding land uses, and the rule, standard, policy, or practice from which relief is sought;
- Whether the accommodation is necessary to afford the applicant equal opportunity to enjoy and use a specific dwelling;



- Whether the accommodation will have only incidental economic or monetary benefits to the applicant, and whether the primary purpose of the accommodation is to assist with real estate speculation or excess profit-taking;
- Whether the accommodation will create a substantial adverse impact on surrounding land uses, or a public nuisance, that cannot be reasonably mitigated;
- Whether the accommodation is reasonably feasible considering the physical attributes of the property and structures;
- Whether there are alternative accommodations which may provide an equivalent level of benefit to the applicant, while minimizing adverse impacts on surrounding land uses and lessening the financial and/or administrative burden on the city;
- Whether the requested accommodation would impose an undue financial or administrative burden on the city; and
- Whether the requested accommodation would constitute a fundamental alteration of the zoning or building laws, policies or procedures of the city.

Within 30 days of receiving a complete application the director must issue a decision on the application. Notice of the Director's decision is provided in the same manner as for the original application and any person may make a request for a director's hearing of the decision within 10 days of mailing of the notice of decision.

A decision regarding reasonable accommodation is subject to appeal to the Planning Commission or City Council.

This process is consistent with State law and assists persons with disabilities in improving their access to housing.

### **Emergency Shelters**

Pursuant to State law, jurisdictions with an unmet need for emergency shelters are required to identify a zone(s) where emergency shelters are allowed as a permitted use without a conditional use permit or other discretionary permit. The identified zone must have sufficient capacity to accommodate the shelter need, and at a minimum provide capacity for at least one year-round shelter. Permit processing, development and management standards for emergency shelters must be objective and facilitate the development of, or conversion to, emergency shelters.

As discussed in the analysis of homelessness in Chapter 2, in 2019 a 100-bed emergency shelter/navigation center opened in Placentia.

Municipal Code Section 23.47.130 allows emergency shelters by-right (i.e., without discretionary action) in the M – Manufacturing District subject to the following standards:



- (1) The facility shall conform to all property development standards of Chapter 23.47 “M” – Manufacturing District.
- (2) Maximum number of beds or persons to be served per night by a single shelter shall not exceed 30 persons at any one time.
- (3) The facility shall operate on a first-come, first serve basis with clients only permitted on-site between 5:00 p.m. and 8:00 a.m. A curfew of 10:00 p.m. or earlier shall be established and strictly enforced, and clients shall not be admitted after curfew. Clients shall vacate the facility by 8:00 a.m. and have no guaranteed bed for the next night.
- (4) The maximum stay at the facility shall not exceed 45 days within a 120-day period.
- (5) Emergency shelters shall be located at least 300 feet from any residential use or residentially-zoned property, public or private park, or public or private kindergarten through 12th grade curriculum school, as measured from the closest property line. In addition, homeless shelters shall be located at least 300 feet from any other homeless shelter, as measured from the closest property line.
- (6) A minimum of one staff member per 15 beds shall be awake and on duty when the facility is open and a minimum of 2 staff members shall be on-site when the facility is open.
- (7) Exterior lighting shall be provided for the entire outdoor and parking area of the property. The lighting shall be stationary, directed away from adjacent properties and public rights-of-way.
- (8) A waiting area shall be provided, which contains a minimum of 10 square feet per bed provided at the facility. The waiting area shall be in a location not adjacent to the public right-of-way, shall be visually separated from public view by a minimum 6-foot-tall, visually screening mature landscaping, or a minimum 6-foot-tall decorative masonry wall, and shall provide consideration for shade/rain provisions.
- (9) All facility improvements shall comply with the city of Placentia Municipal Code, and the most current adopted Building and Safety Codes.
- (10) A security and safety plan shall be provided for the review and approval of the city administrator or designee. The plan may be required to address additional security and safety needs, as identified by the city administrator or designee. The approved security and safety plan shall remain active throughout the life of the facility. The plan shall contain provisions addressing the topical areas outlined below:
  - (A) Sleeping areas addressing the separation of male/female sleeping areas, as well as any family areas within the facility.
  - (B) Loitering control with specific measures regarding off-site controls to minimize the congregation of clients in the vicinity of the facility during hours that clients are not allowed on-site.



(C) Management of outdoor areas, including a system for daily admittance and discharge procedures and monitoring of waiting areas with goals to minimize disruption to nearby land uses.

(D) Alcohol and illegal drugs addressing how the operator(s) will control and regulate alcohol and illegal drug use by clients on the premises.

(E) The operator(s) shall provide the city with the most current contact information for the operator(s) of the facility during the normal daytime office business hours, and the nighttime contact information for the “person on duty” when the emergency shelter is operating.

(F) The operator(s) shall ensure proper compliance with all state laws pertaining to client residency and occupancy.

(G) Staff and Training. The plan shall describe the staffing plan and required staff training programs. Facility staff shall be trained in operating procedures, safety plans, and assisting clients with referral services. The facility shall not employ staff who have been convicted of a felony or who are required to register as a sex registrant under California Penal Code Section 290. The plan shall describe procedures for ensuring shelter staff meet these requirements.

(H) Facilities shall be maintained in good working order. Indoor and outdoor use areas shall be clean and orderly. Litter shall be removed in and around the facility in a timely manner and graffiti shall be removed within forty-eight (48) hours.

(I) A “good neighbor policy” shall be established whereby clients are instructed to be considerate of neighbors and refrain from behavior that is disruptive to the surrounding community. The operational plan shall include a written protocol for ongoing communications with the city and the surrounding neighborhood and businesses, and for responding to neighborhood complaints.

(11) The facility may provide the following services in designated areas separate from sleeping areas:

(A) A recreation area either inside or outside of the facility.

(B) A counseling center for job placement, education, health care, legal, or mental health services.

(C) Laundry facilities to serve the number of clients at the facility.

(D) Kitchen for the preparation of meals.

(E) Dining hall.

(F) Client storage area (i.e., for the overnight storage of bicycles and personal items).

(G) Counseling programs to be provided with referrals to outside assistance agencies and provide an annual report to the city.



(H) Or similar services geared to homeless clients.

(12) An emergency shelter facility shall provide off-street parking at a ratio of one (1) space per four (4) beds, and/or one-half (0.5) per bedroom designed as a family unit with children, plus one (1) per staff member, or shall submit a parking study, subject to the approval of the city administrator or designee, demonstrating the required parking demand justifies a reduced amount of off-street parking. Each facility is also encouraged to provide bike racks for clients in a secured area.

The M District includes approximately 200 parcels encompassing several hundred acres and provides ample opportunities for additional shelters. Many of these parcels have existing buildings that could be adapted for shelter use. Typical parcel sizes are between 1 and 2 acres in size.

To ensure that emergency shelter regulations comply with current State law, Program 1.4 includes annual review of current laws, including allowable separation requirements, and Code amendments will be processed as necessary. In addition, AB 139 (2019) modified the allowable parking standards for emergency shelters; therefore, Program 1.4.2.3 includes a commitment to update City parking standards for emergency shelters consistent with State law.

### Low Barrier Navigation Centers

In 2019 the State Legislature adopted AB 101 establishing requirements for local regulation of low barrier navigation centers, which are defined as “Housing first, low-barrier, service-enriched shelters 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 meeting specified standards must be allowed by-right in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. Program 1.4 in the Housing Plan includes an amendment to City regulations consistent with this requirement.

### **Transitional Housing and Supportive Housing**

California Government Code §65582 establishes the following definitions for transitional and supportive housing:

*Transitional housing* means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.

*Supportive housing* means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. “Target population” means persons with low incomes who have



one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services 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.

The Zoning Code does not identify allowable locations, development standards or review procedures for transitional or supportive housing. State law requires that transitional and supportive housing be permitted as residential uses that are subject only to those regulations that apply to other residential uses of the same type in the same zone. In addition, AB 2162 of 2018 (Government Code §65583(c)(3)) further requires that supportive housing development projects meeting specific criteria must be allowed by-right in all zones allowing multi-family development, including mixed-use and nonresidential zones. Program [1.42-3](#) is included in the Housing Plan (Chapter 4) to update City regulations for transitional and supportive housing consistent with State law.

H.I.S. House currently operates a transitional living facility in Placentia. The facility, which consists of a single-family residence, was sold by the City as the successor housing agency to the non-profit and is deed restricted as affordable housing for a period of 55 years.

### **Agricultural Employee Housing**

The Employee Housing Act (Health and Safety Code, §17021.5 and 17021.6) requires agricultural 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, and 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. The City Zoning Code does not include a definition of agricultural employee housing or regulations for agricultural employee housing. Program 1.4 is included in the Housing Plan to update City regulations for agricultural employee housing consistent with current law.

### **Single Room Occupancy (SRO) Units**

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

The Zoning Code allows SROs with up to 30 units as a permitted use by-right in the R-3 (High Density Multiple Family) District. Larger SRO developments with more than 30 units require approval of a conditional use permit. SROs are also permitted in the C-2



(Community Commercial) District as part of a mixed-use development subject to a conditional use permit.

### **Manufactured Housing**

City regulations for manufactured housing are established in Chapter 23.58 of the Municipal Code. “Manufactured home” or “manufactured housing” refers to housing units built in a factory in one or more sections and transported over the highways to a permanent occupancy site. Manufactured housing is permitted in any district where single-family homes are permitted subject only to site development approval, consistent with State law. Standards for manufactured housing include the following:

- Each manufactured home shall be certified under the National Mobilehome Construction and Safety Standard Act of 1974.
- Each manufactured home shall be placed on a foundation system approved by the director of development services and the chief building official.
- The exterior shall be of a material similar to that utilized in conventionally built single-family dwellings.
- The roof shall be of a material similar to that utilized in conventionally built single-family dwellings, have an eave and gable overhang of not less than 12 inches measured from the vertical side of the manufactured home and have a pitch not less than that required for conventionally built single-family homes.
- An enclosed garage shall be provided which is similar to that provided for single-family dwellings and the exterior siding and roof materials shall be the same as the manufactured home.

Such homes require a Certificate of Compatibility from the Zoning Enforcement Official. The Zoning Code notes that this determination may only consider the roof overhang, roofing material, siding material, and roof design.

### **Accessory Dwelling Units**

Accessory dwelling units (ADUs) provide additional opportunities for affordable housing for people of all ages and economic levels, while preserving the integrity and character of residential neighborhoods.

City ADU regulations are set forth in Municipal Code Chapter 23.73 and were last amended in 2020 to address recent legislation. ADUs are permitted in any zone where residential uses are allowed consistent with State law. Program 1.19 is included in the Housing Plan (Chapter 4) to monitor ADU legislation and update City regulations as necessary to ensure conformance with State law. The program also identifies actions the City will take to encourage production of ADUs.

The Orange County Council of Governments (OCCOG) is currently preparing an “ADU Toolkit” that will be available to all jurisdictions in the county. As noted in Program 1.19 in the Housing Plan, the City will utilize the ADU toolkit, which is expected to



include standard plan examples, and other ADU resources to encourage ADU production.

### **Growth Management Requirements****Other Local Ordinances**

Growth management. The City has no growth management requirements restricting the number of housing units that may be built.

Inclusionary housing. The City has no inclusionary housing requirements.

Short-term rentals. Municipal Code Chapter 6.45 establishes regulations regarding the short-term (i.e., less than 30 days) rental of residential property. Short-term rentals are permitted in all residential zones subject to obtaining a short-term rental permit and business license from the City.

### **Building Codes and Enforcement**

Building and safety codes are adopted to preserve public health and safety, and ensure the construction of safe and decent housing. These codes and standards also have the potential to increase the cost of housing construction or maintenance.

#### **Building Codes**

The City of Placentia adopted the current (2019) California Building Codes, which establish construction standards for all residential buildings. The City updates building codes as needed to further define requirements based on the unique local conditions. The codes are designed to protect the public health, safety and welfare of Placentia's residents. Code enforcement in the City is performed on a complaint basis.

The local amendments to the State Building Codes are derived from Orange County Building Officials, local governments, the Orange County Building Industry Association, and the Orange County Fire Authority. ~~The~~ se City has found that the most recent local amendments to the building codes are necessary to protect public health and safety and do not unduly impact the cost, availability and conservation of housing.

Building codes are enforced through building permit plan check and inspection during construction.

#### **Zoning Code Enforcement**

Contained within the City's Police Department and staffed by Police Services Officers, the City's Zoning Code Enforcement key objective is maintaining and preserving value and appearance in residential, commercial and industrial properties throughout the City. The City's Code Enforcement representatives enforce the following items:



- Substandard housing;
- Garage conversions;
- Property maintenance;
- Recreation vehicle parking on private property;
- Trash container placement, time and location;
- Illegal business activity;
- Inoperable vehicles on private property; and
- Garage sales and signage.

Code enforcement efforts are focused on property maintenance practices and standards so as to avoid conditions, which can be detrimental to the public health, safety, or general welfare. Identification of violations is primarily complaint-based.

The Health, Wellness and Environmental Justice Element of the General Plan also addresses the issue of Code enforcement through the following policies:

HW/EJ 8.2. Focus code enforcement efforts in disadvantaged communities, to improve unsafe and unsanitary conditions, focusing on trash and dumping, overcrowding, illegal home businesses, illegal garage conversions, graffiti, unpermitted plumbing and electrical, and lack of building and yard maintenance. At a minimum, conduct bi-monthly inspections and distribute information about protecting tenant rights, so they are not penalized for reporting or living in a dwelling unit that does not meet health and safety standards. Written outreach efforts should be translated into Spanish.

Policy HW/EJ 13.8. Continue to implement the City's Green Building Code and update as appropriate. Require newly-constructed or renovated City-owned and private buildings and structures to comply with the Green Building Ordinance. Encourage LEEDS certification for commercial, industrial and public projects.

Policy HW/EJ 15.6. Conduct City Council visits to disadvantaged neighborhoods to encourage discussion on items that affect the residents and businesses. Have Council accompanied by representatives from Police, Code Enforcement, Development and Community Services, and other departments. Host an annual community walk with the Mayor and other Council members.

### Planning and Development Fees

Various development and permit fees are charged by the City and other agencies to cover administrative processing costs associated with development. These fees are necessary ensure quality that development complies with applicable regulations and the provision of that adequate services and infrastructure are available to serve the development. Often times, development fees are passed through to renters and homeowners in the price/rent of housing, thus affecting the affordability of housing; however, the City only charges fees that are required to ensure compliance with laws and regulations and protect public health and safety.

The City of Placentia charges the majority of environmental, planning and engineering fees on a fixed fee basis, with some fees deposit-based and ultimately charged on a time



and materials basis. The City annually reviews its fees and used a third-party consultant in 2018~~12~~ to conduct a cost allocation plan and fee study. An update to the fee study is currently (2022) underway. The development fees are a result of actual costs of providing the services and are reviewed annually based on staffing resources and related expenditures to provide services. Table 3-9 summarizes the total typical development fees for single-family and multi-family developments, based on projects recently constructed in the City.

In addition to impact fees for schools, parks, libraries and wastewater, the City requires an affordable housing impact fee for developments of five or more units. The fee ranges from approximately \$2,625 to \$5,250 per market-rate unit depending on project size.

**Table 3-9– Typical Development Fee Comparison, Single Family and Multi-Family**

Development Fee	Single-Family <sup>1</sup>	Multi-Family <sup>2</sup>
Site/Development Plan Review (SPR/DPR)	\$1,896	\$511
<u>Use permit (condo only)</u>	<u>\$7,215</u>	<u>n.a.</u>
<u>Tentative parcel map</u>	<u>\$5,511</u>	<u>n.a.</u>
<u>Tentative tract map</u>	<u>\$7,086</u>	<u>n.a.</u>
Placentia-Linda School District fee	\$6,400	\$3,200
Park in-lieu fee (City)	\$4,978	\$3,628
County Sanitation District fee	\$4,081	\$2,399
County Library Fee	\$1,820	\$1,120
Affordable housing impact fee (City)	\$2,625 - \$5,250	\$2,625 - \$5,250
<b>Total per unit</b>	<b>\$21,800-24,425</b>	<b>\$13,483-16,108</b>

<sup>1</sup> Based on a 2,000-sq.ft. single-family house.

<sup>2</sup> Based on a 1,000-sq.ft. apartment in a 20-unit project.

Source: City of Placentia, 2021

### Local Processing and Permit Procedures

Considerable holding costs can be associated with delays in processing development applications and plans. Three levels of decision-making bodies govern the review process in Placentia: The Zoning Administrator, the Planning Commission and the City Council.

The single-family residential zones are R-A and R-1. As shown in Table 3-5, individual single-family units are permitted by-right in R-A, R-1, R-2, RPC, PUD, SP-6, SP-7, and SP-8.

Multi-family developments of 5 or more units are dwellings are permitted subject to Development Plan Review (DPR) approval by the Planning Commission in the R-2, R-G, R-3, SP-3, SP-4, SP-7 and SP-9 zones, and are subject to Planning Commission approval of a conditional use permit in the RPC zone.

Minimum standards for DPR approval are the following:

- (1) That the development, buildings or structures will conserve property values, promote the direction of building development according to this title, and will not be detrimental to the character of the zone in which the development is proposed, or to suitability of the zone for the particular uses proposed, nor to the character of buildings already erected in the district;



(2) That the proposed development indicates adequate consideration for the other existing or contemplated uses of land in the general area and for the orderly development of the general area;

(3) That the design, functional plan and exterior architecture of the proposed structure will not be at variance with either the design, functional plan or exterior architecture of the structures already constructed or being constructed in the zone district and the immediate neighborhood of the proposed site as to cause a substantial depreciation of property values in the neighborhood;

(4) That the plans indicate the manner in which adjacent structures are protected against noise, vibration and other factors which tend to make the environment less desirable and that such methods are reasonably efficient and satisfactory;

(5) That all of the provisions of this title are complied with;

(6) That the following are so arranged that traffic congestion is avoided, pedestrian and vehicular safety and welfare are protected, and there will be no adverse effect on surrounding property:

(A) Building, structures and improvements,

(B) Vehicular, ingress and egress and internal circulation,

(C) Setbacks,

(D) Height of buildings,

(E) Location of service facilities,

(F) Walls and fences,

(G) Landscaping,

(H) Police and fire protection;

(7) That the proposed lighting is arranged so as to reflect the light away from adjoining properties;

(8) That proposed signs or outdoor advertising structures will not, by size, location, color or lighting, interfere with traffic or limit visibility or depreciate the value of adjoining property or the neighborhood and shall conform to the sign regulations, contained in Chapter 23.90;

(9) That the proposed landscaping shall be designed to enhance the visual and physical use of the property, screen deleterious uses, and in applicable development projects, will incorporate xeriscape principles in accordance with the provisions of Chapter 23.77;

(10) That a solid masonry wall shall be provided around the perimeter of all sites proposed for development. Additionally, all residential lots shall be provided with a solid masonry wall along the rear and side property lines. All walls shall conform to the height regulations contained in Section 23.81.100. Wall requirements may be specified or waived in part or total by a majority vote of the total membership of the planning commission or city council;



(11) That off-street parking facilities shall be provided in conformance to the requirements of Chapter 23.78, and shall be designed in such a manner as to provide convenient access to all buildings;

(12) That there shall be a 10-foot landscape buffer containing evergreen trees wherever a commercial or industrial zone abuts a residentially zoned district. The evergreen trees shall be of a low-water consuming variety in accordance with the provisions of Chapter 23.77;

(13) That there shall be provisions for trash collection areas within 100 feet of each building. Said trash collection areas shall be constructed in accordance with the standard plans on file in the office of the chief building official.

DRP applications are reviewed by the Planning Commission at a public hearing. Notice of the hearing is mailed or delivered at least ten days prior to the hearing to the owner of the subject real property or the owner's duly authorized agent, the project applicant, each local agency that provides facilities and services whose ability to provide those services may be significantly affected, and all owners of real property as shown on the latest equalized assessment roll that are within 300 feet of the exterior boundaries of the proposed project.

The planning commission shall approve the development application only if all of the following findings are made:

(1) The project meets or exceeds the minimum standards listed above; and

(2) There have been attached any other conditions necessary to prevent: (A) detriment to the health, safety or general welfare of the persons residing or working within the neighborhood of the proposed development or within the city, or (B) injurious to the property or improvements within the neighborhood or within the city, and;

(3) The proposed development will be consistent with the latest adopted general plan; and

(4) Conditions necessary to secure the purposes of this section, including guarantees and evidence of compliance with conditions, are made part of the development approval.

The decision of the Planning Commission may be appealed to the City Council by the project applicant, any interested person, or any City Council member within 10 calendar days.

The time required to process a project varies depending on the given project's size and complexity and the number of actions and/or approvals required to complete the process. Both single-family residential and multi-family residential developments typically take between 26 and 412 months for total entitlement and permit processing. Table 3-10 provides a summary of the most common steps in the entitlement process. Not every project is required to follow all the steps outlined in the table. In addition, some of the approval procedures can run concurrently.

While these development review requirements and procedures have not had a significant adverse impact on the cost and supply of housing in Placentia, Program 1.6 in



the Housing Plan includes ongoing To address any constraints posed by processing timelines on residential development, this Housing Element update will include a program to review and revise processing timelines to mitigate and/or remove any identified constraints. review of existing procedures to determine if they create an unwarranted constraint to housing development, particularly for affordable housing. Pursuant to this program, in 2017 the City adopted Old Town Development Standards including a sub-area allowing high-density housing by-right without a public hearing, reducing development processing timeframes, allowing housing at a density up to 65 dwelling units per acre. The City will continue to monitor processing procedures and timelines and modify them as necessary to encourage affordable housing development.

**Table 3-10– Approximate Development Timelines**

Procedure		Processing Time
Initial Contact	Check Requirements: Zoning, General Plan, Use Permit, Variance Tentative Map, Development Plan Review, CEQA	1-3 days
Preliminary Review	Conceptual Plan Submitted: Circulation, Traffic, Parking, Street Improvements, Building Elevations, Signs, Landscaping, CEQA requirements	1-2 weeks
Formal Submittal	Planning Commission Package: Filing Fee, CEQA (Exemption, Negative Declaration, EIR), Site Plan, Preliminary grading plan, Conceptual landscape plan, building elevations, floor plan	4 weeks
Planning Commission Hearing	Input from staff, applicant and public. (Decisions include condition of approval and standard development requirements	1 day
City Council Hearing (if required)	Same package as submitted to the Planning Commission	3 weeks
Submittal of Working Plans (First Check)	All drawings are reviewed for compliance with city design standards and policies, conditions of approval, specific details not included in conceptual plans. Drawings Submitted include engineering plans (Grading and street improvements, sewer, storm drains and utility plans and details) and Building Plans (Structural, electrical, plumbing, heating and ventilation, and air conditioning plans; soil test and reports; structural and energy calculations; landscape and irrigation plans; fence and wall plans; sign plans; and lighting plans).	2-4 weeks
Submittal of Working Plans (Second Check)	All resubmitted plans are reviewed to ensure corrections are completed and all plans consent with each other.	2-4 weeks
Issuance of Permits	Permits are issued after final map is approved and bonds are posted, grading permit issued.	1 day

Source: City of Placentia, 2021

## Environmental and Infrastructure Constraints

### Environmental Constraints

Environmental hazards affecting housing units include geologic and seismic conditions, which provide the greatest threat to the built environment. While the following hazards may impact future development of residential units in the city, they do not preclude development commensurate with the City’s assigned share of regional housing needs.

#### 1. Seismic Hazards

Similar to most southern California cities, Placentia is located within an area considered to be seismically active. No faults have been identified within the City limits. There are six faults within close proximity to Placentia: Whittier-Elsinore,



Norwalk, Newport-Inglewood, Sierra Madre, Palos Verdes and San Gabriel. The Whittier-Elsinore fault is located approximately 1,000 feet to the north of Placentia and is able to produce a seismic event of magnitude 6.0 or greater. The impact of earthquakes on Placentia depends on several factors: the particular fault, fault location, distance from the City, and magnitude of the earthquake. Some areas of the City may experience liquefaction and ground failure during extreme shaking. As part of the City's development review process, future residential projects would be required to prepare geotechnical studies to abate and potential hazards.

### **2. Flooding**

Portions of the City are located within 100-year flood zones. Inundation is projected to be most significant in the southwest portion of Placentia. Flooding within Placentia as a result of a 100-year flood would be expected to reach an average depth of only one foot and only at specific locations.

Prado Dam is a flood control and water conservation project constructed and operated by the U.S. Army Corps of Engineers, Los Angeles District. The dam is located approximately 11 miles east of Placentia, on the Santa Ana River, west of the City of Corona. In the event of dam failure, the flood wave would reach Placentia in approximately 40 to 45 minutes with possible surge wave depths ranging from nine to twenty-three feet.

Carbon Canyon Dam provides flood control in and around the drainage basin. The dam is located approximately one-mile north of Placentia. In the event of the dam's failure at maximum capacity, water would reach the northerly City limits in approximately two minutes with depths ranging from 10 to 30 feet. In the event of a dam failure at either the Prado or Carbon Canyon Dams, the City's emergency evacuation plan would be implemented and emergency service personnel would respond to any hazards.

### **3. Toxic and Hazardous Wastes**

Although definitions of hazardous materials vary, federal, state, and county agencies have generally recognized toxic substances as chemicals or mixtures whose manufacture, process, distribution, use or disposal may present an unreasonable risk to human health or the environment. The OCFA's Hazardous Materials Area Plan provides a detailed hazard analysis of chemical hazards within Orange County.

### **4. Transportation of Hazardous Materials**

Transportation routes through and around the City are used to transport hazardous materials from suppliers to users. Major transportation routes within Placentia include surface streets and railroads. Additionally, the SR-57 and SR-91 freeways are located adjacent to the city. Transportation accidents involving hazardous materials could occur on any of the routes, potentially resulting in explosions, physical contact by emergency response personnel, environmental degradation, and exposure to the public via airborne exposure.



The Federal Department of Transportation (DOT) is the primary regulatory authority for the interstate transport of hazardous materials. The DOT establishes regulations for safe handling procedures (i.e., packaging, marking, labeling and routing). The California Highway Patrol (CHP) enforces the intrastate transport of hazardous materials and hazardous waste.

### 5. Hazardous Waste Management

The *Orange County Hazardous Waste Management Plan* provides policy direction and action programs to address current and future hazardous waste management issues that require local responsibility and involvement in Orange County. The Plan discusses hazardous waste issues and analyzes current and future hazardous waste generation in the County. The Integrated Waste Management Department (IWMD) of Orange County owns and operates three active landfills, four household hazardous waste collection centers (HHWCC) and monitors ten closed landfills.

The *California Health and Safety Code* (H&SC) establishes regulations requiring businesses within the city to complete a chemical inventory to disclose hazardous materials stored, used, or handled on site. The disclosure information is intended to assist emergency responders in planning for and handling emergencies involving hazardous materials. The main program objective is to safeguard the lives of emergency responders, the public, and to minimize property loss. The H&SC also requires a Business Emergency Plan (BEP) to assist in mitigating a release or threatened release of a hazardous material, and to minimize any potential harm or damage to human health or the environment. Disclosure of hazardous materials is updated annually. The Fire Prevention Department of the OCFA is responsible for the distribution and handling of disclosure forms. Additionally, the OCFA maintains the files of all chemical inventory information and business plans, which are made available for public inspection.

### 6. Fire Hazards

The City of Placentia is highly urbanized with no wildlands adjacent to areas zoned for residential use. There is minimal potential for fire related to brush or other natural materials. Fire hazards within the City may be associated with industrial uses, hazardous materials, and arson. The Placentia Fire and Life Safety Department provides fire protection services to Placentia. There are two fire stations located within the City limits.

### 7. Noise

Residential land uses are generally considered to be the most sensitive to loud noises. The principal noise sources in Placentia are the transportation systems. Roadways are the primary source of transportation-generated noise. The Burlington North Santa Fe Railroad also runs through the city along the Orangethorpe Corridor. The Placentia Quiet Zone went into effect in 2007. Along the quiet zone, all trains are prohibited from using horns unless an engineer feels an emergency exists that threatens human or animal injury or property damage. The Orange County Transportation Authority also constructed several grade



separation projects within the City, which further diminish the noise impacts of train traffic.

**Infrastructure**

**1. Sewer**

The City maintains and operates the local sanitary sewer collection system, which includes gravity sewers and lift stations. The Orange County Sanitation District (OCSD) collects, treats, and disposes of the wastewater from central and northwestern Orange County, including Placentia. Wastewater generated by the City is transported through trunk lines to OCSD’s Plant No. 1 (located at 10844 Ellis Avenue, Fountain Valley) and Plant No. 2 (located at 22212 Brookhurst Street, Huntington Beach) where it receives primary and secondary treatment. The City’s future housing needs would generate increased wastewater flows, placing greater demands on wastewater treatment and collection. The City requires individual assessments of potential impacts to wastewater facilities to ensure future development does not impact the ability to serve future needs Current and projected infrastructure capacity is adequate to serve projected housing development during the planning period.

**2. Water**

The City of Placentia is served by the Yorba Linda Water District and the Golden State Water Company. According to Urban Water Management Plans, water supply is expected to be sufficient to accommodate projected housing development during the planning period.

**3. Dry Utilities**

Residential utilities such as electricity, telephone and internet service are available in all residential areas of the city.

**On- and Off-Site Improvements**

On- and off-site improvements may be required in conjunction with future housing development based on the location of the project and existing infrastructure. Dedication and construction of streets, alleys and other public easements and improvements may be required to maintain public safety and convenience. Table 3-11 summarizes the City’s standards for roadway and right-of-way widths.

<b>Table 3-11 – Street Widths</b>			
<b>Streets</b>	<b>Right-of-Way Width (in feet)</b>	<b>Pavement Width Curb Face to Curb Face (in feet)</b>	<b>Median Island Width (in feet)</b>
Major street	120	104	14
Primary or modified major street	100	84	14
Secondary or modified primary street	80	64	N/A
Modified secondary street	64	52	N/A
Local industrial street	60	44	N/A
Local residential/ commercial street	60	40	N/A



**Table 3-11 – Street Widths**

Streets	Right-of-Way Width (in feet)	Pavement Width Curb Face to Curb Face (in feet)	Median Island Width (in feet)
Minor residential street - 500 feet or less in length	56	36	N/A
Minor residential street - looped 800 feet or less	56	36	N/A
Minor residential street - cul-de-sac, 500 feet or less serving 12 lots or less	56	36	N/A
Cul-de-sacs residential/commercial	50 radius	40 radius	N/A
Cul-de-sacs industrial	50 radius	44 radius	N/A

Source: City of Placentia, Municipal Code

Minimum sidewalk widths are as follows:

- Residential district- 4.5 feet
- Commercial district- Minimum 7.5 feet
- Industrial district- Minimum 5.5 feet

New subdivisions may be required to dedicate land for public facilities such as schools, parks, libraries, fire stations or other public uses based on the land requirements for such facilities in the adopted General Plan. Tree well easements are required on major, primary, and secondary streets in accordance with the City’s Municipal Code. Trees are installed by the developer in accordance with the master plan of street trees and City standards.

The on- and off-site improvements required by the City are necessary to adequately provide the infrastructure and public facilities that support housing development. These requirements ensure public safety and health; and are not jeopardized by increased development and do not unduly hinder housing development.

### 3.3 Non-Governmental Constraints

#### Land Prices

Land costs influence the cost of housing. Prices are determined by a number of factors, most important of which are land availability and permitted development density. As land becomes less available, the price of land increases. The price of land also increases as the number of units permitted on each lot increases. In Orange County, undeveloped land is limited and combined with a rapidly growing population land prices have increased. Prices for vacant residential land in Placentia are estimated to be \$35 to \$50 per square foot.

#### Construction Costs

Construction cost is affected by the price of materials, labor, development standards and general market conditions. The City has no influence over materials and labor costs, and the building codes and development standards in Placentia are not substantially different than most other cities in Orange County. Construction costs for



materials and labor have increased at a higher pace than the general rate of inflation recently according to the Construction Industry Research Board. Typical residential construction cost is estimated to be \$150 per square foot or more depending on quality and building type.

### Financing

Mortgage interest rates have a large influence over the affordability of housing. Higher interest rates increase a homebuyer's monthly payment and decrease the range of housing that a household can afford. Lower interest rates result in a lower cost and lower monthly payments for the homebuyer.

The City is not aware of any local constraints to the availability or cost of residential financing. While mortgage underwriting standards appear to have become stricter in the wake of the mortgage crisis during the Great Recession, interest rates are at historic low levels resulting in lower mortgage costs for well-qualified borrowers.

Numerous lending institutions are active in the northern Orange County area where Placentia is located. While interest rates are very low, the significant increase in housing prices in the past few years poses a major barrier to low- and moderate-income homebuyers.

### Other Non-Governmental Constraints

Some neighborhoods in the city are located within a homeowners' association and are subject to conditions, covenants and restrictions ("CC&Rs") that could add time and complexity to the residential development process, such as through private design review requirements.

In recent years there have been no requests to develop residential projects at significantly lower densities lower than allowed by zoning regulations, and no significant delays between the approval of entitlements and building permit applications have been noted.



# Chapter 4: Housing Plan

This section describes Placentia’s goals, policies, programs, and objectives for the 2021-2029 Planning Period related to the preservation, improvement and development of housing in the City. These policies and actions address current and future housing needs, meet the requirements specified by state law and consider the input by residents and stakeholders. While the plan provides a comprehensive approach to address housing issues throughout the City, the emphasis is on actions enabling the City to increase and maintain housing opportunities affordable to extremely-low-, very-low-, low- and moderate-income households.

## 4.1 Housing Goals and Programs

Placentia’s housing goals focus on four policy priority areas. Goals are provided to address each of these areas and programs are developed to support and implement each goal. The four priorities are:

1. Developing and Maintaining Housing Supply and Variety
2. Promoting Equal Housing Opportunity
3. Promoting Housing and Neighborhood Preservation and Conservation
4. Encouraging Housing Cooperation and Coordination

### Goal HE-1: Housing Supply and Variety

Develop and maintain an adequate supply of housing that varies sufficiently in cost, size, type, and tenure to meet the economic and social needs of existing and future residents within the constraints of available land.

#### **Program HE-1.1: Manufactured Housing and Mobile Homes**

The City of Placentia recognizes the importance of existing manufactured housing and mobile homes as a source of affordable housing for the City’s residents. The City shall continue to support the maintenance and improvement of the City’s existing mobile home parks through Code enforcement and rehabilitation grants, if available. In addition, mobile home parks are zoned “MHP” and a zone change would be required to convert these parks to other uses, which incentivizes their preservation.

Objective:	Preserve existing mobile home parks and manufactured housing
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing



**Program HE-1.2: Locate Housing Near Transportation, Employment and Services**

To increase livability within new housing developments, the City shall encourage and coordinate the location of major housing developments, particularly affordable housing and multi-family units, near transportation options, major employment centers and services. The City, through a sustainability grant provided by the Southern California Association of Governments, adopted a transit-oriented development (TOD) zone south of the future Metrolink station which allows densities up to 95 du/acre. The TOD provides for residential uses in proximity to the transit station as well as entertainment, retail and office spaces. The development regulations for the TOD area encourage and facilitate multi-family residential development and live-work units. The City will also encourage housing near transportation, employment, and services through Program HE-1.15: Transit-Oriented Development. The City will further expand opportunities for housing near high-quality public transportation by expanding the TOD zone (see Program 1.8).

Objective:	Encourage new housing in proximity to transportation, employment and services
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing

**Program HE-1.3: Pursue County, State, and Federal Housing Funds**

Monitor availability of county, state, and federal housing programs and pursue available funds on an annual basis as appropriate. The City shall encourage and coordinate with housing developers and service organizations to obtain funds for affordable housing projects, initially through pre-application meetings and throughout project development. The City shall also make funding information available to all proposed developers in the City through informational materials distributed through the City’s website and at pre-application meetings.

Objective:	Increase use of county, state and federal funds
Responsible Agency:	Development Services
Funding Source:	County, state and federal programs
Implementation Schedule:	Monitor funding opportunities on an annual basis and apply for funding as opportunities arise

**Program HE-1.4: Emergency Shelters, Low Barrier Navigation Centers, and Transitional and Supportive Housing and Agricultural Employee Housing**

Emergency shelters. The Zoning Code allows emergency shelters and transitional/supportive housing in compliance with State Law (SB 2). To



address the needs of homeless persons, the City purchased a property at 731 S. Melrose Street and constructed a 100-bed homeless shelter, which opened in March 2020. The City will continue to encourage these types of housing opportunities. To ensure compliance with recent changes to State law (AB 139), a Code amendment will be processed in 2022 to revise emergency shelter parking standards. Separation requirements for emergency shelters will also be modified consistent with current law.

Low barrier navigation centers. In 2019 the State Legislature adopted AB 101 establishing requirements for local regulation of low barrier navigation centers, which are defined as “Housing first, low-barrier, service-enriched shelters 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 meeting specified standards must be allowed by-right in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. A Code amendment will be processed in 2022 to update City regulations consistent with this requirement.

Transitional and supportive housing. California Government Code Sec. 65582 establishes the following definitions for transitional and supportive housing:

*Transitional housing* means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.

*Supportive housing* means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. “Target population” means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services 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.

State law requires that transitional and supportive housing be permitted as residential uses that are subject only to those regulations that apply to other



residential uses of the same type in the same zone. In addition, AB 2162 of 2018 (Government Code §65583(c)(3)) further requires that supportive housing development projects meeting specific criteria must be allowed by-right in all zones allowing multi-family development, including mixed-use and nonresidential zones. The City will update regulations for transitional and supportive housing consistent with State law in 2022.

Agricultural employee housing. California Health & Safety Code Sec. 17021.5 requires agricultural 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, and requires agricultural 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. The City will amend zoning regulations for agricultural employee housing in 2022 consistent with these provisions of State law.

Objective:	<del>Continue to e</del> Encourage the provision of emergency shelters, <u>low barrier navigation centers</u> , transitional and supportive housing <u>and agricultural employee housing consistent with State law</u>
Responsible Agency:	Development Services
Funding Source:	General Fund (including funds from County, State and Federal governments)
Implementation Schedule:	<u>Code amendments by October 2022</u> <del>Ongoing</del>

**Program HE-1.5: Infrastructure Provision**

To ensure that requirements for infrastructure provision are not considered an undue constraint to residential development, the City shall review infrastructure provision costs and procedures on an annual basis. Based on its findings, the City shall work with housing developers to reduce costs and streamline infrastructure-financing programs. In partnership with SCAG, the City Council recently approved formation of an EIFD in the Old Town Zoning District that will result in \$8.2 million in funding for infrastructure related to transit-oriented development. The City will review available infrastructure grant funding annually and apply for grants when the City is eligible.

Objective:	Reduce constraints associated with infrastructure
Responsible Agency:	Development Services/Public Works/Engineering
Funding Source:	General Fund, CDBG, Capital Improvements Program
Implementation Schedule:	Annual review, revisions as appropriate



**Program HE-1.6: Development Processing System Review**

The City shall continue to review existing procedures for project review, processing and building plan check to determine if the procedures are a constraint to housing development. Based on these findings, the City shall develop programs and procedures to minimize processing timelines for extremely-low-, very-low-, low- and moderate-income housing developments. In 2017 the City adopted Old Town Development Standards including a sub-area allowing high-density housing by-right without a public hearing, reducing development processing timeframes, allowing housing at a density up to 65 dwelling units per acre. The City shall monitor processing timelines and modify as needed to further encourage affordable housing development.

The City will also prepare written SB 35 review procedures and objective standards to minimize constraints on housing supply and affordability for eligible projects. Consistent with new transparency laws, zoning, development standards and fees will continue to be posted on the City website.

Objective:	Minimize development review/processing time
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	<u>Prepare SB 35 procedures by October 2022.</u> <u>Continue to post zoning, development standards and fees on the City website.</u> Ongoing, Annual Review

**Program HE-1.7: Vacant and Underutilized Land Inventory**

To provide additional areas for housing development and maximize the potential for a variety of housing types, the City will identify vacant and underutilized sites for development of residential units. Additionally, the City will maintain and update an inventory of these sites on an annual basis. The City will provide information about these sites to housing developers through printed materials available at City Hall and electronically on the City’s website.

Objective:	Inventory of vacant and underutilized land
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Annual update of inventory

**Program HE-1.8: Adequate Sites for Housing Development**

Through the Regional Housing Needs Assessment (RHNA) process, the City has been assigned a total housing need of 4,398,374 dwelling units during the 2021-2029 timeframe. The sites analysis (Appendix B) determined that



there is currently a shortfall of potential housing capacity compared to the City's identified need.

To ensure the availability of adequate sites to accommodate this ~~assigned~~~~projected~~ need, the City shall identify and rezone ~~sufficient at least 14 acres of land with allowable~~~~appropriate~~ densities of at least 30 units/acre to accommodate the shortfall of lower-income sites compared to the RHNA allocation ~~in all income categories, as identified in Appendix B.~~ Rezoned sites shall comply with the requirements of Government Code §65583.2(h) and (i).

The City shall encourage the development of housing through financial incentives (such as land write-downs; assistance with on- or off-site infrastructure costs, fee waivers, or deferrals to the extent feasible); expedited entitlement review; in-kind technical assistance; and other regulatory concessions or incentives. The City will also provide incentives for lot consolidation (see Program HE 1.18).

For any non-vacant sites identified in Appendix B that were listed in a previous Housing Element sites inventory, or vacant sites that were listed in two previous consecutive inventories, residential development will be allowed by-right when a housing project provides at least 20 percent of the units affordable to lower-income households in compliance with Government Code §65583.2(c).

Development on any site listed in Appendix B that proposes to demolish existing housing units shall be subject to a policy requiring the replacement of affordable units as a condition of any development on the site pursuant to Government Code §65583.2(g)(3). Replacement requirements shall be consistent with those set forth in §65915(c)(3).

To facilitate housing development, zoning regulations, development standards and fees will be posted on the City website, and the City will establish written procedures for streamlined review consistent with Government Code §65913.4.

Objective:	Rezone sufficient land with appropriate densities to accommodate the RHNA allocation
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	<del>Prior to Rezoning adequate sites by</del> October 2024

**Program HE-1.9: Monitoring of Constructed Units Based on Income-Level**

To effectively track performance during the planning period, the City will track the income levels of units constructed by including an estimate sales/rental value at the time of unit occupancy. This value will be included



as part of the building permit application to reflect the assumed market value of the home constructed.

Objective:	Tracking performance by income level.
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing

**Program HE-1.10: Encourage Development of Housing for Extremely-Low-Income Households**

The City will encourage the development of housing units for households earning 30 percent or less of the Area Median Income for Orange County. The City shall work with non-profit developers and service providers with the specific emphasis on providing family housing and non-traditional housing types such as single-room-occupancy units, transitional housing and units serving temporary needs by providing in-kind technical assistance and support in seeking funding. The City shall encourage housing for extremely-low-income households through incentives and activities such as technical assistance, expedited processing and flexibility in development standards. The completion and occupancy of 49 very-low-income units in 2020 (the Veteran's Village development) was an example of the successful implementation of this program in the previous planning period. The City will continue to review other incentive programs and pursue partnerships with non-profit developers regarding affordable housing opportunities. The elimination of redevelopment set aside funds severely restricts this effort.

Objective:	616 ELI units
Responsible Agency:	Development Services
Funding Source:	General Fund//HOME/CDBG/LIHTC
Implementation Schedule:	Annual consultation with affordable housing developers, or as development opportunities arise

**Program HE-1.11: Density Bonus Ordinance**

The City of Placentia provides for a density bonus, incentives and concessions to facilitate and encourage the development of lower-income housing units through its Density Bonus Ordinance. To ensure that City regulations are consistent with recent changes to State law, the City will process an amendment to the ordinance in 2022. The City will inform housing developers of the Density Bonus Ordinance through informational materials distributed at City Hall, on the City’s website and during pre-application meetings.



Objective:	Update the Density Bonus Ordinance consistent with State law
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Code amendment in 2022

**Program HE-1.12: Development of Senior Housing**

The City recognizes the unique character of the senior population. Seniors typically have specialized housing needs and fixed incomes that may require housing units not generally included in market rate housing. In 2020 the City Council approved entitlements for a 64-unit affordable senior housing development at 1314 N. Angelina Drive. The City shall continue to encourage the development of a wide range of housing choices for seniors through incentives (e.g., financial assistance, parking reductions, regulatory waivers). These may include independent living communities and assisted living facilities with on-site services and access to health care, nutrition, transportation and other appropriate services.

Objective:	Senior Housing Development
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing

**Program HE-1.13: Development of Housing for Larger Families**

The City recognizes that providing appropriately-sized housing units for large families is important to improving livability, reducing instances of overcrowding and minimizing deferred maintenance issues. The City shall encourage incorporation of units with 3 or more bedrooms in for-sale and rental housing developments to accommodate the needs of larger families through activities such as technical assistance, expedited processing, and flexibility in development standards.

Objective:	Housing units with 3+ bedrooms
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing

**Program HE-1.14: Housing for Persons with Special Needs**

Housing to accommodate persons and families with special needs is a high priority for Placentia. In 2018 the City approved the Veteran’s Village development with 49 very-low-income units for veterans who are homeless or at risk of homelessness. The project also provides services such as vocational training, mental health counseling, job placement, etc. The City shall continue to work with non-profit housing developers, service providers and the County of Orange to encourage and support the development of housing for special needs households, including persons with developmental



disabilities, through activities such as technical assistance, assistance in seeking funding annually, expedited processing and flexibility in development standards.

Objective:	<u>Increased availability of housing units for households with special needs</u>
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	<u>Monitor funding opportunities annually; Ongoing</u>

**Program HE-1.15: Transit-Oriented Development**

Transit-Oriented Development (TOD) is a compact mixed-use or commercial area designed to maximize access to public transport, and often incorporates features to encourage transit ridership. Consistent with federal, state and regional policies focusing on concentrated growth around transit, in 2017 the City Council adopted the TOD Packing House zoning district, which allows densities up to 95 du/acre near the future Metrolink Station. Since then, 633 multi-family units have been entitled in the TOD District. Also in 2017, the Old Town Zoning District was adopted, which includes a sub-area allowing high-density housing by-right up to 65 units per acre. The City continues to work with developers on TOD opportunities connected with the forthcoming Placentia Metrolink Station. Incentives include the utilization of City-owned property as well as reduced parking requirements and densities up to 95 dwelling units per acre for the TOD Zone and up to 65 dwelling units per acre for the Old Town Zone. The City shall encourage Transit-Oriented Developments through incentives that may include financial assistance, density bonus, and regulatory waivers. (see also Programs 1.2 and 1.8). To expand housing opportunities, an amendment to the TOD zone will be processed to extend the district as described in Program 1.8 and Appendix B.

Objective:	Encourage transit-oriented development
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing; <u>expand TOD zone boundaries in 2022</u>

**Program HE-1.16: Single-Room Occupancy (SROs)**

Single-room-occupancy developments (SROs) provide housing opportunities for lower-income individuals, persons with disabilities, and the elderly. State law requires that jurisdictions identify zoning districts available to encourage and facilitate a variety of housing types, including SROs. The Zoning Code allows SRO developments in the R-3 and C-2 districts. The City will continue to encourage development of SROs through a variety of methods including financial assistance, density bonus, and regulatory concessions.



Objective:	Facilitate development of SROs
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing

**Program HE-1.17: Residential Parking Requirements**

The City’s greatest potential for affordable housing development exists in the area near the Metrolink station. As part of the new TOD zone for this area, the City adopted parking standards based on the realistic demand and opportunities for shared parking in TOD and mixed-use developments, especially new housing units affordable to lower- and moderate-income households. The City will also initiate an amendment to the Code to ~~revise~~ reduce multi-family parking standards for small (i.e., studio or 1-bedroom) units in the R-3 district to one covered space per unit (garage or carport) to reduce this potential constraint.

Objective:	Revise <del>ew</del> existing multi-family parking standards <u>in the R-3 district and revise as necessary</u>
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	<u>October 2022-23</u>

**Program HE-1.18: Encourage and Facilitate Lot Consolidation**

The City will encourage and facilitate consolidation of vacant and underutilized lots to create larger building sites for residential development through a lot consolidation density incentive that allows a 5% density increase when parcels totaling at least 0.5 acre are consolidated, and a 10% density increase when parcels totaling at least 1.0 acre are consolidated. This incentive program will be publicized to developers and other interested parties through printed materials available at City Hall and electronically on the City’s website.

Objective:	Encourage/facilitate lot consolidation
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Zone Code amendment in 2022-23

**Program HE-1.19: Accessory Dwelling Units**

Accessory dwelling units (also known as ADUs, second units or granny flats) can help to address a portion of the city’s housing needs, particularly for small lower-income households. City ADU regulations were updated in 2020 consistent with State law. The City will continue to monitor legislation and revise regulations as necessary to ensure conformance with current law.

The Orange County Council of Governments (OCCOG) is currently preparing an “ADU Toolkit” that will be available to all jurisdictions in the county. The



City will utilize the ADU toolkit, which is expected to include standard plan examples, and other ADU resources to encourage ADU production. In addition, the City will explore and pursue ADU funding annually, modify development standards and reduce fees beyond the minimum requirements of State law, prepare pre-approved plans, and provide homeowner/applicant assistance tools.

Objective:	Encourage ADU production
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	<u>Monitor and pursue ADU funding opportunities annually; review and update ADU regulations annually</u> Ongoing

## Goal HE-2: Equal Housing Opportunity

Promote equal housing opportunities for all persons without discrimination regardless of race, religion, ethnicity, sex, age, disability, marital status or household composition.

### **Program HE-2.1: Support Regional and Local Fair Housing Efforts**

The City will continue to disseminate information regarding fair housing in a variety of locations including City Hall, the City website and the library, and conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings. The City will continue to seek funding to support~~refer fair housing inquiries to~~ the Fair Housing Council of Orange County (FHCOC), ~~which. The organization~~ provides community education, individual counseling, mediation, and low-cost advocacy with the expressed goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire. The City will invite FHCOC to conduct annual fair housing outreach targeted to Placentia residents and landlords.

Objective:	<u>Affirmatively further</u> <del>F</del> fair housing activities
Responsible Agency:	Development Services
Funding Source:	General Fund; <u>grants if available</u>
Implementation Schedule:	<u>Annual fair housing outreach;</u> Ongoing

### **Program HE-2.2: Section 8 Rental Assistance**

The City will continue to provide referral services and information to residents regarding the Section 8 Rental Housing Assistance Program administered by the Orange County Housing Authority.



Objective:	Provide information regarding housing assistance
Responsible Agency:	Orange County Housing Authority
Funding Source:	HUD
Implementation Schedule:	Ongoing

**Program HE-2.3: Minimize Constraints on Housing for Persons with Disabilities**

The City will continue to implement the Reasonable Accommodation Ordinance, which provides relief from local regulations and permitting procedures that may have a discriminatory effect on housing for persons with disabilities. In addition, a Zoning Ordinance amendment will be processed in 2022 to update the definition of “family” following regulations consistent with State law.

- ~~• Revise parking standards for emergency shelters consistent with AB 139 (2019)~~
- ~~• Establish standards for transitional and supportive housing consistent with State law~~
- ~~• Establish standards for low barrier navigation centers consistent with State law~~
- Revise the definition of “family”.

Objective:	Minimize regulatory constraints on housing for persons with disabilities
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Code amendment in 2022; Ongoing

**Program HE-2.4: Comprehensive Housing Resource Directory**

The City of Placentia will continue to coordinate with the County of Orange to publicize the County’s Comprehensive Housing Resource Directory, which will be made available on the City’s website and in print form at City Hall, the library and other public buildings.

Objective:	Housing Resource Directory
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing

**Goal HE-3: Neighborhood Preservation**

Encourage activities that conserve and improve existing residential neighborhoods including a housing stock that is well maintained and structurally sound, and with adequate services and facilities provided; and having a sense of community identity.



**Program HE-3.1: Community Based Neighborhood Rehabilitation**

Encourage neighborhood rehabilitation programs that maximize community participation in the maintenance and improvement of housing in individual neighborhoods. The City will coordinate with and assist neighborhood and non-profit organizations in implementing programs such as “Neighborhood Pride Days” where the City will collect electronic waste and bulk waste from residents, promote neighborhood cleanup and beautification especially in low-income areas.

Objective:	Conserve and improve existing residential neighborhoods
Responsible Agency:	Development Services
Funding Source:	CDBG
Implementation Schedule:	Ongoing

**Program HE-3.2: Neighborhood Identity**

Encourage the creation of neighborhood themes and identity in all types of residential developments by use of building material, texture, color and landscaping linked with architectural styles.

Objective:	Create neighborhood identity
Responsible Agency:	Development Services
Funding Source:	Private sources
Implementation Schedule:	Ongoing

**Program HE-3.3: Placentia Rehabilitation Grant Program**

The City of Placentia shall continue to provide grants to rehabilitate owner-occupied, very-low-income housing units. The City shall outreach to potential applicants continuously through the City’s website and will distribute printed material annually.

Objective:	72 units <u>rehabilitated during the planning period</u>
Responsible Agency:	Development Services
Funding Source:	CDBG
Implementation Schedule:	Ongoing: <u>annual announcements in City publications</u>

**Program HE-3.4: Energy Conservation and Sustainable Building Practices**

The City recognizes that utility costs contribute to a household’s overall expenditure for housing. The City shall promote energy and water conservation and “green building” in new and existing residential developments by providing educational materials on the City’s website and in print form at City Hall, the library and at other public buildings. Compliance with Title 24 of the California Building Code will be required of all residential construction necessitating a building permit. The City shall



also refer residents to local utility providers for energy and water conservation programs through the City’s website. Finally, through participation in the HERO Program, the City shall provide information and encourage property owners to participate in the property-assessed conservation improvements as allowed by the program.

Objective:	Energy conservation/reduced utility costs
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Continue to provide energy conservation educational materials to residents

**Program HE-3.5: Monitoring and Preserve Affordable Housing At-Risk of Conversion to Market Rate Units**

The City shall continue to monitor units ~~in the City~~ with affordability covenants that ~~are eligible to~~ will expire during the ~~next 10 years~~ planning period. To encourage the preservation of these “at-risk” units, the City shall coordinate with the County and non-profit housing organizations to encourage the extension and/or renewal of deed restrictions or covenants, comply with noticing requirements, provide education and assistance to tenants, assist with funding, and promptly reach out to qualified entities to preserve at-risk housing units

Objective:	Encourage preservation and extension/renewal of “At Risk” units
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing coordination with the County and nonprofits

**Program HE-3.6: Vacant Building Ordinance**

To prevent blight and deterioration of Placentia’s residential and non-residential neighborhoods, the Municipal Code establishes owner responsibilities for the maintenance and rehabilitation of long-term vacant buildings. The ordinance requires the registration of vacant properties resulting from foreclosure, and provides for an administrative monitoring program for boarded-up and vacant buildings. To ensure compliance, the ordinance imposes fees and civil penalties; and provides for administrative review and appeal opportunities. The City will continue to implement this ordinance to prevent blight and deterioration in Placentia’s neighborhoods.

Objective:	Prevent blight and deterioration in neighborhoods
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing



## Goal HE-4: Housing Cooperation and Coordination

Coordinate local housing efforts with appropriate federal, state, regional, and local governments and/or agencies and to cooperate in the implementation of intergovernmental housing programs to ensure maximum effectiveness in solving local and regional housing problems.

### Program HE-4.1: Partnerships with the Housing Industry

The City of Placentia has limited resources to use for the development and maintenance of affordable housing. To maximize its funding and staff resources, the City shall seek opportunities to partner with non-profit and for-profit housing developers.

Specifically, the City shall proactive seek partnerships to develop affordable housing on identified sites within the TOD area near the Metrolink Station to meet the City’s lower-income housing needs. The City shall contribute to the partnership through activities such as in-kind technical assistance, support in seeking grant and funding opportunities, and financial assistance, which may include land write-downs and assistance with on- or off-site infrastructure costs where feasible. The City will contact affordable housing organizations annually to solicit interest in development.

Objective:	Establish partnerships with nonprofit and for-profit housing developers
Responsible Agency:	Development Services/ Neighborhood Services Division
Funding Source:	General Fund, state and federal grants
Implementation Schedule:	<u>Annual outreach to affordable housing developers</u> Ongoing

### Program HE-4.2: Participation in Continuum of Care Forum

The City recognizes that homelessness is both a local and regional issue that requires a comprehensive and coordinated effort among various cities and agencies throughout the region. The City of Placentia will continue to participate ~~through regular attendance at meetings of~~ the County of Orange Continuum of Care Forum to pool resources to address homeless needs.

Objective:	Continue participation in the County of Orange Continuum of Care Forum
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing <u>coordination and meeting attendance</u>



## 4.2 Quantified Objectives

Activity	Quantified Objective
<b>New Construction</b>	
Extremely Low	616
Very Low	615
Low	680
Moderate	770
Above Moderate	1,693
Total	4,374
<b>Rehabilitation</b>	
Acquisition and Rehabilitation	6 (2 Extremely Low, 2 Very Low, 2 Low)
Placentia Rehabilitation Grant Program	30 Very Low/Low
<b>Conservation</b>	
At-Risk Units	Imperial Villas - 58 units



## Appendix A: Community Outreach

Public participation is an important component of the Housing Element update. *Government Code* §65583(c)(8) states that “The local government shall make diligent effort to achieve public participation of all the economic segments of the community in the development of the housing element, and the program shall describe this effort.” Public participation played an important role in the formulation and refinement of the City’s housing goals and policies and in the development of a Land Use Plan that determines the extent and density of future residential development in the community.

City residents and other interested parties were provided many opportunities to identify housing issues of concern, recommend strategies, review the draft element, and provide recommendations to decision-makers on the Housing Element. The following public meetings were held during the course of the update:

June 8, 2021	Planning Commission study session
August 24, 2021	Public Workshop
September 16, 2021	Public Workshop
October 12, 2021	Planning Commission study session
October 19, 2021	City Council study session
<u>January 11, 2022</u>	<u>Planning Commission public hearing</u>
<u>January 18, 2022</u>	<u>City Council public hearing</u>
<u>March 8, 2022</u> <del>TBD</del>	Planning Commission <u>public</u> hearing
<u>March 15, 2022</u> <del>TBD</del>	City Council <u>public</u> hearing

In addition to these public meetings, the City used several other methods to encourage participation in the Housing Element update, particularly among lower-income households, persons with special needs and non-English speakers. Early in the update process a Housing Element webpage was established (<https://placentia.org/943/2021-2029-Housing-Element-Update>) where meeting notices, an FAQ, draft documents and other reference materials were posted. Prior to each public meeting, notices were sent directly to a list of stakeholders (Table A-1), which included organizations that represent the interests of low-income households and persons with disabilities or other special needs. Notices were posted in both English and Spanish.

A Housing Element Frequently Asked Questions was prepared and posted on the City’s Housing Element website, and an online survey was also conducted for interested stakeholders to identify housing needs and issues (see Table A-2).

Common themes raised during the public meetings are the need for affordable housing, particularly for service sector employees, and also the challenges with additional development, such as traffic and demands on public services. The programs described in Chapter 4 seek to address these concerns, including encouraging development of additional affordable and special needs housing, while recognizing the City’s limited resources.

## Appendix A: Community Outreach

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**Table A-1: Public Meeting Notification List**

Kennedy Commission 17701 Cowan Ave., Suite 200 Irvine, CA 92614 <a href="mailto:cesarc@kennedycommission.org">cesarc@kennedycommission.org</a> <a href="mailto:mildredp@kennedycommission.org">mildredp@kennedycommission.org</a>	League of Women Voters PO Box 1065 Huntington Beach, CA 92647 <a href="mailto:hat@lwvorangeoast.org">hat@lwvorangeoast.org</a>	OC Association of Realtors 25552 La Paz Road Laguna Hills, CA 92653
Neighborhood Housing Services of Orange County 198 W. Lincoln Ave., 2nd Floor Anaheim, CA 92805	Habitat for Humanity of Orange County 2200 S. Ritchey St. Santa Ana, CA 92705	Jamboree Housing Corp. 17701 Cowan Avenue Suite 200 Irvine, CA 92614
The Related Companies of California 18201 Von Karman Ave Ste 900 Irvine, CA 92612	Community Housing Resources, Inc. 17701 Cowan Avenue, Suite 200 Irvine, CA 92614	BIA/OC 17744 Sky Park Circle #170 Irvine, CA 92614
Dayle McIntosh Center 501 N. Brookhurst Street, Suite 102 Anaheim, CA 92801	OC Housing Providers 25241 Paseo de Alicia, Suite 120 Laguna Hills, CA 92653	Regional Center of Orange County P.O. Box 22010 Santa Ana, CA 92702-2010
OC Business Council 2 Park Plaza, Suite 100 Irvine, CA 92614	OC Housing Trust 198 W. Lincoln Ave., 2nd Floor Anaheim, CA 92805	Neighborhood Housing Services of Orange County 198 W. Lincoln Ave., 2nd Floor Anaheim, CA 92805
Mercy Housing 480 S Batavia St Orange, CA 92868	OC Housing & Community Development 1501 E. St Andrew Place, First Floor Santa Ana, CA 92705	Orange County Housing Authority 1501 E St Andrew Pl Santa Ana, CA 92705
Fair Housing Council of Orange County 2021 E. 4th Street, Suite 122 Santa Ana, CA 92705	City of Anaheim Community Development Director 200 S. Anaheim Blvd. Anaheim, CA 92805	City of Brea Community Development Director 1 Civic Center Circle Brea, CA 92821
City of Yorba Linda Community Development Director 4845 Casa Loma Avenue Yorba Linda, CA 92885	City of Fullerton Community Development Director 303 W. Commonwealth Ave. Fullerton, CA 92832	Placentia-Yorba Linda USD 1301 E. Orangethorpe Ave. Placentia, California, 92870

## Appendix A: Community Outreach

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Mercy House  
P.O. Box 1905  
Santa Ana, CA 92702

Orange County Water District  
P.O. Box 8300  
Fountain Valley, CA 92728-8300

Orange County Sanitation District  
10844 Ellis Avenue  
Fountain Valley, CA 92708

Pathways of Hope  
1231 E Chapman Ave  
Fullerton, CA 92831

OC Partnership  
1505 17th St.  
Santa Ana, CA 92705

[Campaign for Fair Housing Elements](#)  
[57 Post Street](#)  
[San Francisco, CA 94104](#)  
[info@fairhousingelements.org](mailto:info@fairhousingelements.org)

[Elizabeth Hansburg](#)  
[People for Housing OC](#)  
[elizabeth@peopleforhousing.org](mailto:elizabeth@peopleforhousing.org)



## CITY OF PLACENTIA 2021-2029 Housing Element Update Community Workshop

### The City of Placentia is beginning the process of updating the 2021-2029 Housing Element!

Please join us in-person or virtually to learn about what happens when the City updates its Housing Element, why the City is required to do so, and what opportunities community members have to give feedback. Your participation is important to help plan for Placentia’s housing future.

**The community meeting will focus on:**

- Housing needs and services within Placentia
- Opportunities to provide housing at all income levels in the community
- Identifying constraints to building and accessing housing

**WHEN:** Tuesday, August 24th at 6:00 pm

**IN-PERSON:** Whitten Community Center  
900 S. Melrose Street  
Placentia, CA 92870

**VIRTUAL:** Zoom Link: [tinyurl.com/placentiahousing](https://tinyurl.com/placentiahousing)



For questions, please contact City Staff at [DSD@placentia.org](mailto:DSD@placentia.org) or (714) 993-8124  
[www.placentia.org/housingelement](http://www.placentia.org/housingelement)



## ¡La Ciudad de Placentia está comenzando el proceso de actualización del Elemento Vivienda 2021-2029!

Por favor, únase a nosotros en persona o virtualmente para aprender sobre lo que sucede cuando la Ciudad actualiza su Elemento de Vivienda, por qué se requiere que la Ciudad lo haga y qué oportunidades tienen los miembros de la comunidad para dar su opinión. Su participación es importante para ayudar a planificar el futuro de la vivienda de Placentia.

### La reunión de la comunidad se centrará en:

- Necesidades y servicios de vivienda dentro de Placentia
- Oportunidades para proporcionar vivienda en todos los niveles de ingresos en la comunidad
- Identificación de limitaciones para la construcción y el acceso a la vivienda

**CUÁNDO:** Martes 24 de agosto a las 6:00 pm

**EN PERSONA:** Whitten Community Center  
900 S. Melrose Street  
Placentia, CA 92870

**VIRTUAL:** Zoom Link: [tinyurl.com/placentiahousing](https://tinyurl.com/placentiahousing)



Si tiene preguntas, comuníquese con el personal de la ciudad al [DSD@placentia.org](mailto:DSD@placentia.org) o al (714) 993-8124  
[www.placentia.org/housingelement](http://www.placentia.org/housingelement)



## The City of Placentia is beginning the process of updating the 2021-2029 Housing Element!

Please join us in-person or virtually to learn about what happens when the City updates its Housing Element, why the City is required to do so, and what opportunities community members have to give feedback. Your participation is important to help plan for Placentia's housing future.

### The community meeting will focus on:

- Housing needs and services within Placentia
- Opportunities to provide housing at all income levels in the community
- Identifying constraints to building and accessing housing

**WHEN:** Thursday, September 16th at 6:00 pm

**IN-PERSON:** Senior Center/Powell Building  
143 S. Bradford Avenue  
Placentia, CA 92870

**VIRTUAL:** Zoom Link: [tinyurl.com/placentiahousing](https://tinyurl.com/placentiahousing)



For questions, please contact City Staff at [DSD@placentia.org](mailto:DSD@placentia.org) or (714) 993-8124  
[www.placentia.org/housingelement](http://www.placentia.org/housingelement)



## ¡La Ciudad de Placentia está comenzando el proceso de actualización del Elemento Vivienda 2021-2029!

Por favor, únase a nosotros en persona o virtualmente para aprender sobre lo que sucede cuando la Ciudad actualiza su Elemento de Vivienda, por qué se requiere que la Ciudad lo haga y qué oportunidades tienen los miembros de la comunidad para dar su opinión. Su participación es importante para ayudar a planificar el futuro de la vivienda de Placentia.

### La reunión de la comunidad se centrará en:

- Necesidades y servicios de vivienda dentro de Placentia
- Oportunidades para proporcionar vivienda en todos los niveles de ingresos en la comunidad
- Identificación de limitaciones para la construcción y el acceso a la vivienda

**CUÁNDO:** Jueves 16 de septiembre a las 6:00 pm

**EN PERSONA:** Senior Center/Powell Building  
143 S. Bradford Avenue  
Placentia, CA 92870

**VIRTUAL:** Zoom Link: [tinyurl.com/placentiahousing](https://tinyurl.com/placentiahousing)



Si tiene preguntas, comuníquese con el personal de la ciudad al [DSD@placentia.org](mailto:DSD@placentia.org) o al (714) 993-8124  
[www.placentia.org/housingelement](http://www.placentia.org/housingelement)



## 2021 Housing Element FAQ

### 1. What is a Housing Element?

State law<sup>1</sup> requires each city to adopt a comprehensive, long-term General Plan for its physical development. Placentia's General Plan<sup>2</sup> is divided into the following "elements" or chapters that contain goals, policies and programs which are intended to guide land use and development decisions:

- Land Use
- Housing
- Mobility
- Conservation
- Open Space & Recreation
- Safety
- Noise
- Economic Development
- Health, Wellness & Environmental Justice
- Sustainability

The purpose of the Housing Element is to evaluate the housing needs of Placentia's current and future residents and set forth policies and programs to address those needs.

While most portions of General Plans typically have a time horizon of 20-25 years, State law requires that the Housing Element be updated in 8-year "cycles." The City is currently preparing a Housing Element update for the 2021 to 2029 planning period, which is referred to as the "6<sup>th</sup> Housing Element cycle" in reference to the six required updates that have occurred since the comprehensive revision to State Housing Element law in 1980.

State law<sup>3</sup> establishes detailed requirements for Housing Elements, which are summarized in 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.*

<sup>1</sup> California Government Code Sec. 65300 et seq.

<sup>2</sup> <https://www.placentia.org/166/General-Plan-Update>

<sup>3</sup> California Government Code Sec. 65580 et seq.



## Placentia 2021 Housing Element FAQ

### 2. What is Housing Element “certification” and why is it important?

The State Legislature has delegated to the California Department of Housing and Community Development (“HCD”) the authority to review Housing Elements and issue findings regarding the elements’ compliance with the law.<sup>4</sup> When HCD issues a letter finding that the Housing Element is in substantial compliance with State law it is referred to as “certification” of the Housing Element.

Housing Element certification is important for two main reasons:

- **Local control.** The General Plan and its various elements provide the foundation for the City’s land use plans and development regulations, and the Housing Element is part of the General Plan. If the City were challenged in court on a planning or zoning matter and the General Plan were found by the court to be invalid, the court could order changes to City land use plans or regulations and assume control over City land use decisions. HCD certification establishes a “rebuttable presumption of validity”<sup>5</sup> that the Housing Element complies with State law, which would support the City’s legal defense. Recent laws also allow courts to impose fines on a jurisdiction if it fails to adopt a Housing Element in compliance with State law.<sup>6</sup>
- **Eligibility for grant funds.** Some State grant funds are contingent upon Housing Element certification. Grants can help to cover the cost of some projects that would otherwise rely on the City’s General Fund.

Placentia’s last Housing Element update was completed in 2014 and was certified by HCD as fully compliant with State law.

### 3. What are the most important issues that must be addressed in the Housing Element update?

The major issues that must be addressed in the Housing Element update are: 1) how City policies, plans and regulations help to meet the region’s housing needs for persons and families of all income levels; and 2) how City land use regulations accommodate the special housing needs of those with disabilities or other difficulties.

- **Accommodating Regional Housing Needs.** Under State law<sup>7</sup> all cities are required to plan for additional housing to accommodate population growth and address existing housing problems such as overcrowding and high housing cost. State law recognizes that cities generally do not build housing, since that is typically the role of private and non-profit developers and builders. However, cities are required to adopt policies, development regulations and standards to encourage a variety of housing types that are affordable for persons of all income levels. The Regional Housing Needs Assessment (“RHNA”) is the method by which each jurisdiction’s share of new housing needs is determined (see #5 below).

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<sup>4</sup> California Government Code Sec. 65585

<sup>5</sup> California Government Code Sec. 65589.3.

<sup>6</sup> AB 101 of 2019

<sup>7</sup> California Government Code Sec. 65583



## Placentia 2021 Housing Element FAQ

- **Housing for Persons with Special Needs.** Under State law<sup>8</sup> cities must also ensure that their plans and regulations encourage the provision of housing for persons with special needs including:
  - ✓ Reasonable accommodation for persons with disabilities
  - ✓ Transitional housing
  - ✓ Supportive housing
  - ✓ Emergency shelters and other facilities serving the homeless
  - ✓ Large families (5 or more persons)
  - ✓ Farm workers

### 4. What is “affordable” housing?

By definition, housing is considered “affordable” when total housing cost, including utilities, is no more than 30% of a family’s gross income. State law describes five income categories, which are based on county median income as shown in Table 1.

**Table 1. Household Income Categories**

Income Category	% of county median income
Extremely low	Up to 30%
Very low	31-50%
Low	51-80%
Moderate	81-120%
Above moderate	Over 120%

Source: California Government Code Sec. 65584(f)

Affordable housing costs for all jurisdictions in Orange County are determined based on these income categories as shown in Table 2. These incomes, rents and housing prices are based on a 4-person family and are adjusted for different family sizes.

**Table 2. Income Categories and Affordable Housing Costs - Orange County**

Income Category	Maximum Income	Affordable Rent	Affordable Price (est.)
Extremely Low	\$40,350	\$1,009	(1)
Very Low	\$67,250	\$1,681	(1)
Low	\$107,550	\$2,689	(1)
Moderate	\$128,050	\$3,201	\$500,000
Above moderate	Over \$128,050	Over \$3,201	Over \$500,000

Assumptions:

- Based on a family of 4 and 2021 State income limits
- 30% of gross income for rent or principal, interest, taxes & insurance
- 5% down payment, 4% interest, 1.25% taxes & insurance, \$350 HOA dues

Notes:

- (1) For-sale affordable housing is typically at the moderate income level

Source: Cal. HCD; JHD Planning LLC

<sup>8</sup> California Government Code Sec. 65583(a)(5)



## Placentia 2021 Housing Element FAQ

### 5. What is the “RHNA” why is it important?

Each California city is required to plan for new housing to accommodate a share of regional needs. The Regional Housing Needs Assessment (“RHNA”) is the process established in State law<sup>9</sup> by which housing needs are determined.

Prior to each planning cycle the total new housing need for each region of California is determined by HCD based upon economic and demographic trends, existing housing problems such as overcrowding and overpayment, and additional housing needed to ensure reasonable vacancy rates and replace units lost due to demolition or natural disasters.

Placentia is located within the Southern California Association of Governments (“SCAG”) region, which includes Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura counties. The total housing need for the SCAG region is distributed to cities and counties by SCAG based upon objectives and criteria established in State law.<sup>10</sup>

In 2019 HCD determined that the total new housing need for the entire SCAG region in the 6<sup>th</sup> Housing Element cycle is 1,341,827 units. In March 2021 SCAG adopted the RHNA plan for the 6<sup>th</sup> cycle, which fully allocates the RHNA to jurisdictions in the SCAG region.<sup>11</sup> Table 3 shows the RHNA allocations for Placentia, Orange County, and the entire SCAG region.

**Table 3. 6<sup>th</sup> Cycle RHNA – Placentia, Orange County and SCAG Region**

	Placentia	Orange County	SCAG Region
Housing need allocation 2021-2029	4,374	183,861	1,341,827

Source: SCAG, 3/4/2021

The RHNA also distributes each jurisdiction’s total housing need into four income categories (the extremely-low and very-low categories are combined for RHNA purposes). Placentia’s 6<sup>th</sup> cycle RHNA allocation by income category is shown in Table 4.

**Table 4. 6<sup>th</sup> RHNA by Income Category – Placentia**

Extremely Low + Very Low	Low	Moderate	Above Moderate	Total
1,231	680	770	1,693	4,374

Source: SCAG, 3/4/2021

### 6. Is the RHNA a construction mandate?

The RHNA allocation identifies the projected amount of additional housing a jurisdiction would need in order to have enough housing at all price levels to fully accommodate its assigned share projected growth over the 8-year planning period while also eliminating existing problems of overcrowding and overpayment. The RHNA is a *planning requirement* based upon housing need, *not a construction quota or mandate*. Jurisdictions are not required to build housing or issue permits to achieve their RHNA

<sup>9</sup> California Government Code Sec. 65584 et seq.

<sup>10</sup> California Government Code Sec. 65584(d)

<sup>11</sup> <http://www.scag.ca.gov/programs/pages/housing.aspx>



## Placentia 2021 Housing Element FAQ

allocations, but some provisions of State law establish specific requirements when housing production falls short of RHNA allocations. One such requirement is streamlined review and approval of housing development applications that meet specific standards.<sup>12</sup> Other than requirements for streamlined permit processing, there are currently no legal or financial penalties imposed on cities for failing to achieve their RHNA allocations.

### 7. What must cities do to comply with the RHNA?

The Housing Element must provide an evaluation of the city's capacity for additional housing based on land use patterns, development regulations, other development constraints (such as infrastructure availability and environmental conditions) and real estate market trends. The analysis must be prepared at a parcel-specific level of detail and identify properties (or "sites") where additional housing could be built consistent with City regulations. This evaluation is referred to as the "sites analysis" and State law requires the analysis to demonstrate that the city has adequate capacity to fully accommodate its RHNA allocation in each income category. If the sites analysis does not demonstrate that adequate capacity exists to fully accommodate the RHNA, the Housing Element must describe what steps will be taken to increase capacity commensurate with the RHNA - typically through amendments to land use and zoning regulations that could facilitate additional housing development. Such amendments typically include increasing the allowable residential density or allowing housing to be built in areas that are currently restricted to only non-residential land uses.

### 8. Why are cities in high-cost areas expected to have affordable housing? Low-cost housing is not economically feasible here due to high land prices.

State housing laws are based on the premise that every city has an obligation to adopt regulations to accommodate a range of housing types for persons at all income levels. Every community is dependent on a variety of low- and moderate-income workers in jobs such as landscaping, building maintenance, child and elder care, medical technicians, personal services, clerical support and retail trade. While the existing housing stock serves the needs of many residents, market rents and prices are higher than some families can afford. In addition, low-wage jobs have increased at a much faster rate than affordable housing is being built.

While cities are not required to build new housing, they must ensure that their land use regulations encourage a full range of housing types. Rental apartments typically provide the majority of affordable housing, but other types of housing such as accessory dwelling units (ADUs) can also help to address this need. Various governmental programs provide funding assistance for affordable housing, but if a city's development regulations do not allow sufficient additional housing, the housing needs of the local workforce may be shifted to other cities.

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<sup>12</sup> California Government Code Sec. 65913.4 (SB 35 of 2017)



## Placentia 2021 Housing Element FAQ

### 9. Placentia is fully developed. Why is the RHNA allocation so high?

SCAG’s 6<sup>th</sup> cycle RHNA allocation for the entire 6-county region is 1,341,827 units compared to 412,137 units in the 5<sup>th</sup> cycle. There are two main reasons why the 6<sup>th</sup> RHNA allocation is so much higher than the 5<sup>th</sup> cycle.

First, the 5<sup>th</sup> cycle RHNA allocation was established in 2012 while the severe economic effects of the “Great Recession” were discouraging growth. As a result, the 5<sup>th</sup> RHNA was uncharacteristically low. For comparison, SCAG’s 4<sup>th</sup> cycle (2006-2013) RHNA allocation was approximately 700,000 housing units.

Second, for the 6<sup>th</sup> cycle the State made a major modification to the process for determining RHNA allocations. In prior RHNA cycles, total housing need was based only on *projected population growth*. However, for the 6<sup>th</sup> RHNA cycle the State added *existing need* to the total RHNA calculation. Existing need includes households that are currently overcrowded (defined as more than one person per room) or are overpaying for housing (defined as more than 30% of gross income). The total 6<sup>th</sup> cycle RHNA allocation for the SCAG region is comprised of the sum of existing need and projected need, as follows:

Existing need:	577,422 units
Projected need:	764.405 units
Total need:	1,341,827 units

As seen from this breakdown, if existing need were excluded (as was the case in prior RHNA cycles) the total need would be similar to the 4<sup>th</sup> cycle RHNA.

With regard to jurisdictional RHNA allocations, the methodology adopted by SCAG for the 6<sup>th</sup> cycle places greater emphasis on the proximity of housing to jobs and public transit rather than availability of vacant developable land. As a result, the urbanized areas of Los Angeles and Orange counties have been assigned much higher housing need as compared to prior cycles even though they generally have much less vacant land than inland areas.

The RHNA allocations assume that in many urbanized cities of Orange and Los Angeles counties, a significant portion of new housing needs will be met through the redevelopment of older commercial properties.

### 10. How will Placentia accommodate its new housing needs assigned in the RHNA?

Placentia is fully developed and very little vacant land suitable for new housing is available. Therefore, the City’s RHNA allocation must be satisfied through redevelopment of properties with potential for new housing or mixed use (i.e., a combination of housing and other uses on the same property). In recent years Placentia has adopted plans for the redevelopment of properties near downtown and the future Metrolink<sup>13</sup> station. The Housing Element update will identify a strategy for providing additional opportunities to accommodate the City’s assigned housing need.

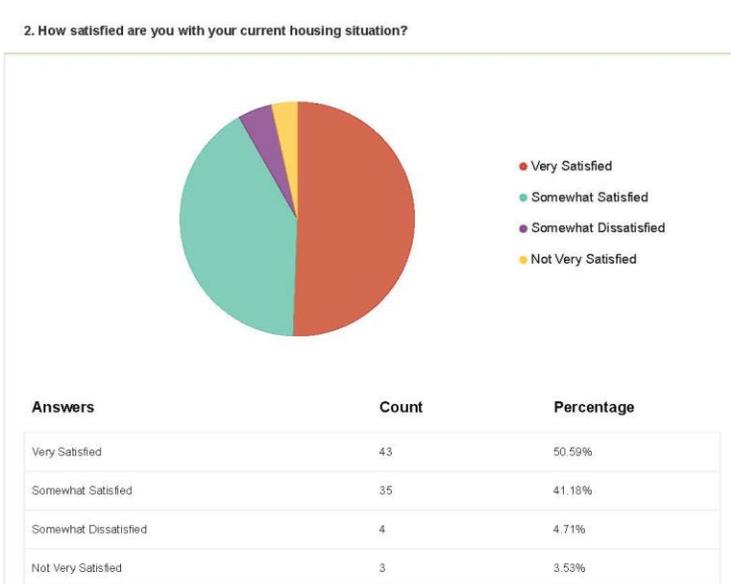
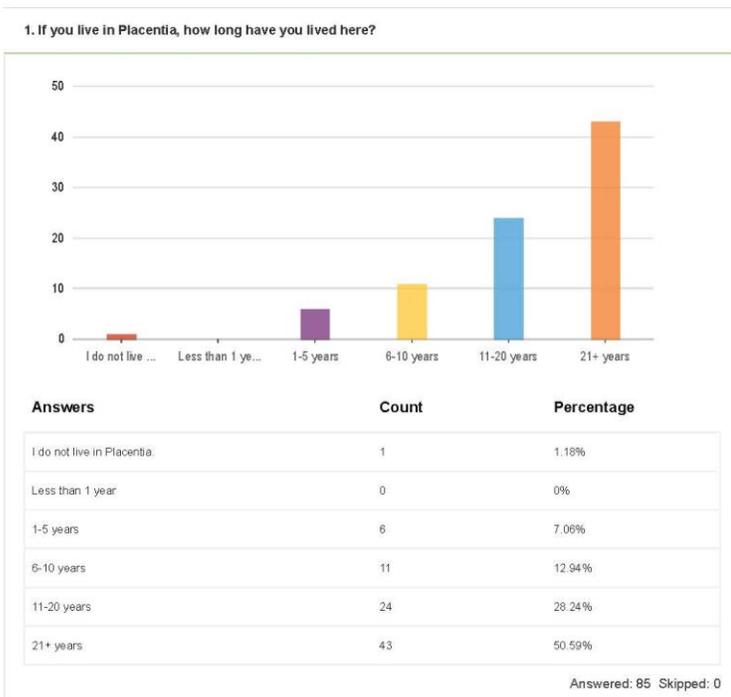
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<sup>13</sup> <https://www.placentia.org/705/Metrolink-Station-and-Parking-Structure>



Table A-2: Online Survey Results

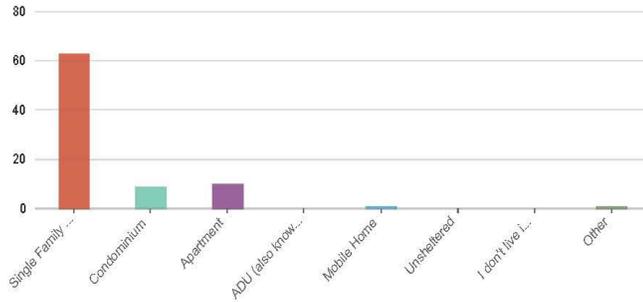
2021 Housing Element Survey





Answered: 85 Skipped: 0

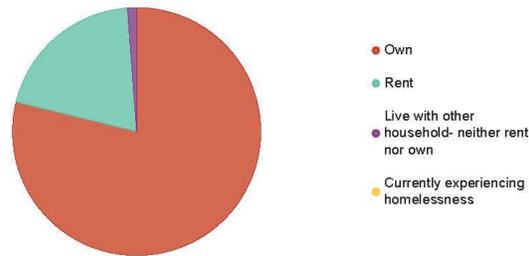
3. If you live in Placentia, select the type of housing unit you reside in:



Answers	Count	Percentage
Single Family Home	63	74.12%
Condominium	9	10.59%
Apartment	10	11.76%
ADU (also known as second unit or "Granny unit")	0	0%
Mobile Home	1	1.18%
Unsheltered	0	0%
I don't live in Placentia	0	0%
Other	1	1.18%

Answered: 84 Skipped: 1

4. Do you rent or own the home you live in?



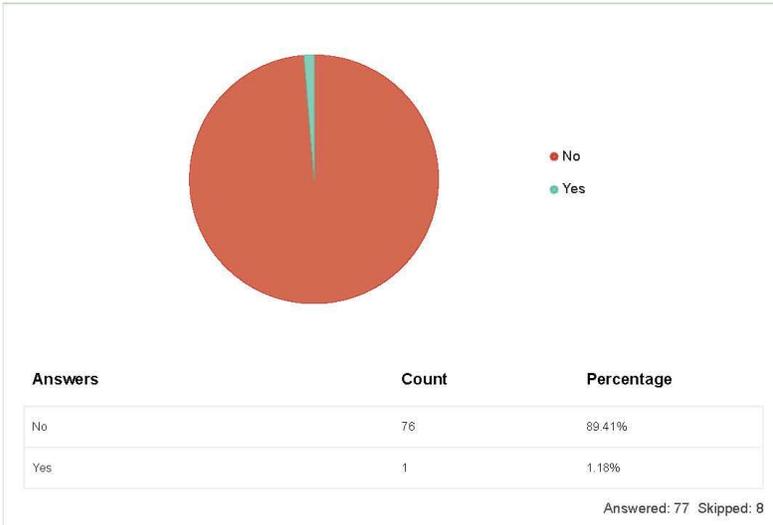
Answers	Count	Percentage
Own	67	78.82%
Rent	17	20%
Live with other household- neither rent nor own	1	1.18%
Currently experiencing homelessness	0	0%



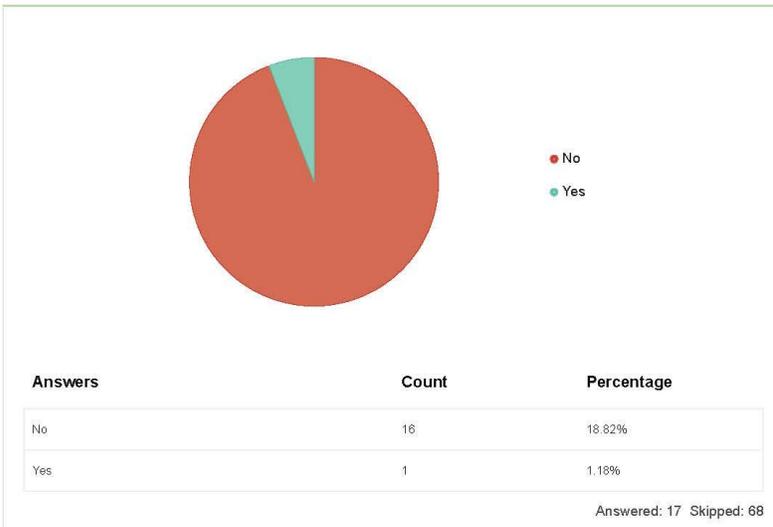
Currently experiencing homelessness	0	0%
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Answered: 85 Skipped: 0

5. If you reside in a single-family house, does the property have a second unit/guest house/ADU? (If you answered No, skip to question 7.)

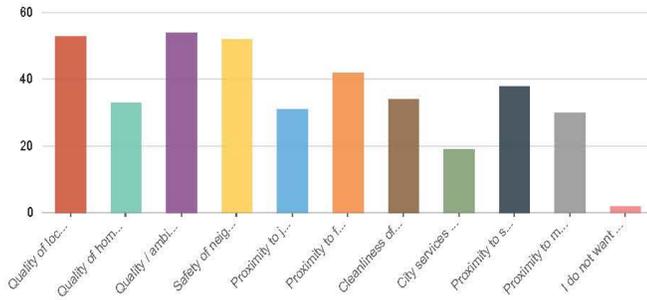


6. Is this second unit/guest house/ADU occupied?



7. Please select the top reasons you choose to live or would like to live in Placentia. Check all that apply.

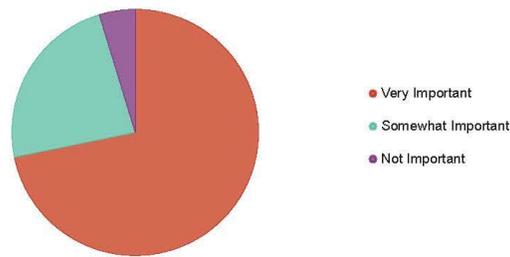
# Appendix A: Community Outreach



Answers	Count	Percentage
Quality of local school system	53	62.35%
Quality of home	33	38.82%
Quality / ambience of neighborhood	54	63.53%
Safety of neighborhood	52	61.18%
Proximity to jobs	31	36.47%
Proximity to family	42	49.41%
Cleanliness of streets and surroundings	34	40%
City services and programs	19	22.35%
Proximity to shopping and services	38	44.71%
Proximity to medical care	30	35.29%
I do not want to live in Placentia.	2	2.35%

Answered: 85 Skipped: 0

## Maintaining the character of existing residential neighborhoods

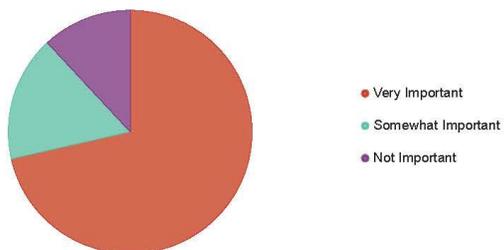


Answers	Count	Percentage
Very Important	61	71.76%
Somewhat Important	20	23.53%
Not Important	4	4.71%



Answered: 85 Skipped: 0

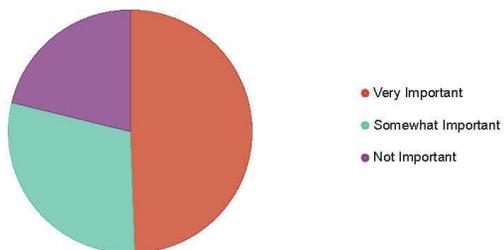
Ensuring that children who grow up in Placentia can afford to live in Placentia.



Answers	Count	Percentage
Very Important	60	70.59%
Somewhat Important	14	16.47%
Not Important	10	11.76%

Answered: 84 Skipped: 1

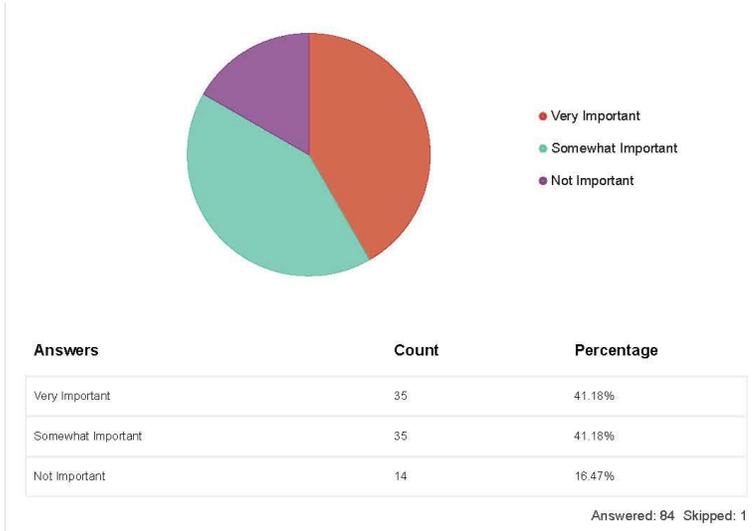
Ensuring that the housing market in Placentia provides a diverse range of housing types, including single-family, townhomes, apartments, duplex/triplex, and cond



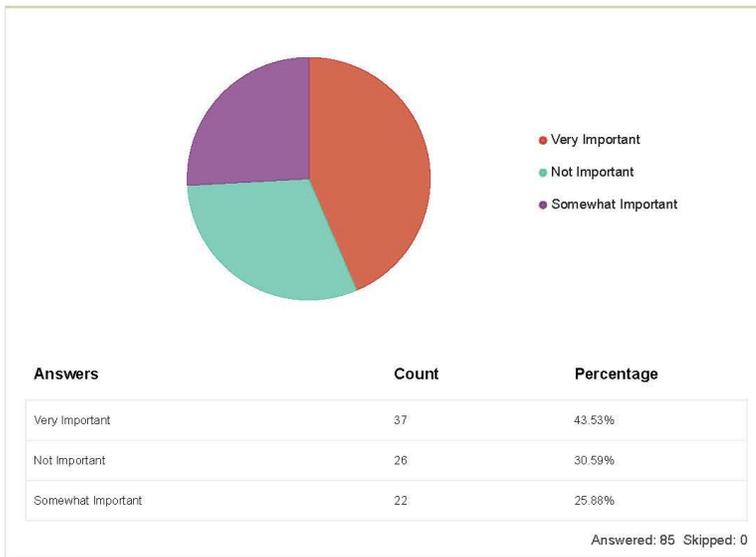
Answers	Count	Percentage
Very Important	42	49.41%
Somewhat Important	25	29.41%
Not Important	18	21.18%

Answered: 85 Skipped: 0

Establishing special needs housing for seniors, large families, veterans, and/or persons with disabilities

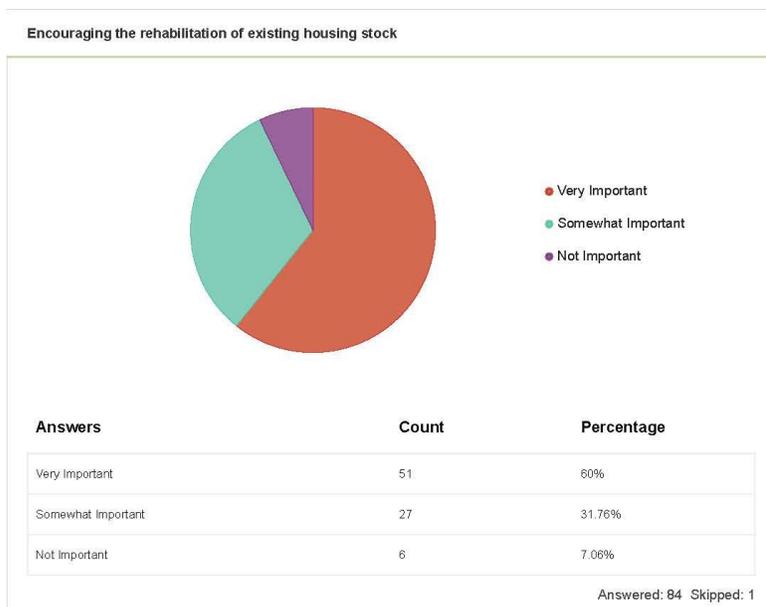
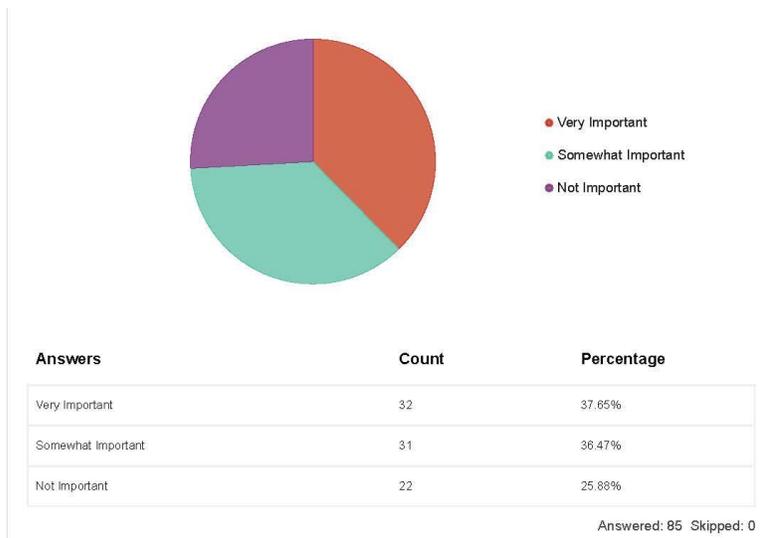


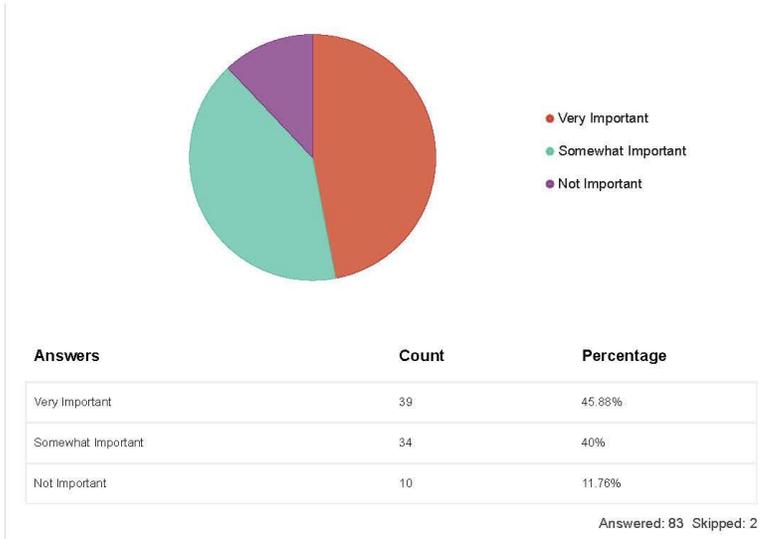
**Integrating affordable housing throughout the community to create mixed-income neighborhoods**



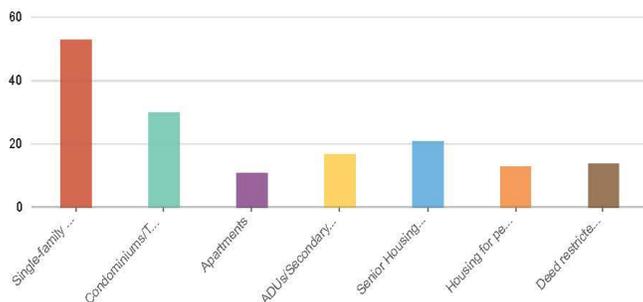
**Providing shelters and transitional housing for the homeless, along with services to help move people into permanent housing**







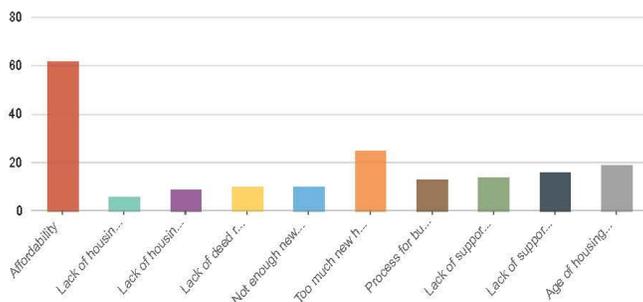
9. What type of housing do you think is most needed in the City of Placentia? Check all that apply.



Answers	Count	Percentage
Single-family houses	53	62.35%
Condominiums/Townhouses	30	35.29%
Apartments	11	12.94%
ADUs/Secondary Units or "Granny Flats"	17	20%
Senior Housing	21	24.71%
Housing for persons with Disabilities	13	15.29%
Deed restricted affordable housing	14	16.47%

Answered: 79 Skipped: 6

10. What do you think are the most important housing related issues facing Placentia today? Check all that apply.



Answers	Count	Percentage
Affordability	62	72.94%
Lack of housing for large families	6	7.06%
Lack of housing for smaller families	9	10.59%
Lack of deed restricted affordable housing	10	11.76%
Not enough new housing development	10	11.76%
Too much new housing development	25	29.41%
Process for building housing is too burdensome	13	15.29%

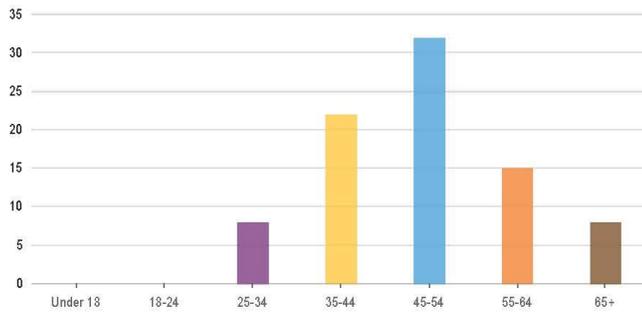
# Appendix A: Community Outreach



Lack of support for renters	14	16.47%
Lack of support for homeowners	16	18.82%
Age of housing stock	19	22.35%

Answered: 82 Skipped: 3

## 11. What age range most accurately describes you?



Answers	Count	Percentage
Under 18	0	0%
18-24	0	0%
25-34	8	9.41%
35-44	22	25.88%
45-54	32	37.65%
55-64	15	17.65%
65+	8	9.41%

Answered: 85 Skipped: 0

## 12. Are there any additional comments/suggested goals that you would like to provide the City for its 2021 Housing Element update?



Word	Count
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## Appendix B: Residential Land Inventory

California Housing Element law mandates that each city show it has adequate sites available through appropriate zoning and development standards to accommodate a range of housing types and income levels. This appendix evaluates potential sites for additional housing development to accommodate the City’s assigned need in the Regional Housing Needs Assessment (RHNA).

### Methodology for the Sites Inventory Analysis

The residential sites inventory is comprised of four components: 1) approved projects; 2) vacant sites; 3) underutilized (non-vacant) sites with potential for additional residential development or redevelopment; and potential accessory dwelling units (ADUs).

Based on the “default density” provisions of State law, vacant or underutilized sites of at least one-half acre that allow a density of at least 30 units/acre are considered suitable for housing in all income categories. Sites smaller than one-half acre and sites allowing multi-family or mixes-use at a density less than 30 units/acre are considered suitable for moderate- or above-moderate-income housing, while sites zoned for single-family-detached homes are assigned to the above-moderate category. For approved projects (Table B-2) income levels are based upon the actual or anticipated sales prices or rents.

Potential sites for residential development during the 2021-2029 planning period are summarized in Table B-1. As shown in this table, based on current zoning the capacity is not sufficient to fully accommodate the City’s RHNA allocation in all income categories. Analysis supporting this finding is provided in the discussion below and in Tables B-2 through B-4. Program HE-1.8 in the Housing Plan includes a commitment to identify and rezone sufficient sites to address this shortfall.

**Table B-1: Residential Sites Summary**

Income Category	Very Low	Low	Moderate	Above Moderate	Total
Approved Projects (Table B-2)	-	252187	-	774	1,026
Vacant Sites (Table B-3)	-	-	394496	6569	459
Underutilized Sites (Table B-4)	698786	404469	371257	247384	1,720
ADUs	14	24	17	1	56
<b>Total Capacity</b>	712800	680	782770	1,0871,228	3,196
RHNA	1,24331	680	782770	1,693	4,398
Surplus (Shortfall)	(531431)	-	-	(606465)	(1,137)

Source: City of Placentia, 2021

### Approved Projects

Table B-2 summarizes residential developments that have received some form of approval and will become available during the planning period. Three projects have been approved in the TOD district at densities ranging from 73 to 89 units/acre. One of these is a 100% low-income deed-restricted housing development (USA Properties, Figure B-1). These projects demonstrate that high-density residential

## Appendix B: Residential Land Inventory



and mixed-use development is highly marketable in this area. All of the projects were built on underutilized sites formerly occupied by industrial and warehouse uses.

**Table B-2: Approved Projects**

Project/Address	Product Type	Density (units/ac)	Units by Income Category	Status/Notes
The Herald 110-132 E. Crowther Ave.	6-story multi-family	72.9	215 (market-rate)	TOD district; redevelopment of industrial/warehouse; 95 du/ac max allowed (77%)
505, 515, 523, 531, 535 W. Crowther Ave, 407 Goetz Place, 409 Evelyn Place	5-story mixed use	82.9	418 (market-rate)	TOD district; redevelopment of industrial/warehouse; 95 du/ac max allowed (87%)
USA Properties 207-209 W. Crowther Ave.	6-story mixed use	88.7	189 (187 deed-restricted lower-income)	TOD district; redevelopment of former packing house; 95 du/ac max allowed (93%)
<u>Santa Angelina NE corner Angelina/Morse</u>	<u>2-story multi-family</u>	<u>16.9</u>	<u>65 (deed-restricted senior low income)</u>	<u>Redevelopment of a church campus. Zone change from R1 to R3.</u>
455 S. Van Buren	Townhouse	25.0	139 (market-rate)	Redevelopment of underutilized and blighted non-conforming automotive dismantling yard.
<b>Totals</b>			<b><del>252</del>187 low 774 above-mod</b>	

**Figure B-1: TOD Affordable Mixed-Use Project (207-209 W. Crowther Ave)**



### Vacant Sites

Like many older communities in the Southern California metropolitan area, Placentia has minimal vacant land suitable for residential development. The majority of vacant land is within Specific Plan 7, bounded by Buena Vista Avenue to the north, Rose Drive to the west, Orangethorpe Avenue along the south, and the Van Buren Street to the east. Many of the vacant parcels are contiguous land areas too small to allow for construction. However, through lot consolidation these parcels have the potential to provide opportunities for new housing construction. Table B-3 shows vacant sites that are suitable for residential development. Based on the densities permitted in these areas, future units would be



affordable to moderate- and above-moderate-income households. Due to high land values and the relatively low densities allowed on these parcels, it is expected that future housing developments will seek near the maximum allowable number of units on each site; however, the inventory shown in Table B-3 conservatively reflects a 10% reduction from the allowable number of units.

### Underutilized Sites

Underutilized sites with potential for additional residential development or redevelopment are listed in Table B-4. The most significant opportunities for additional housing development are within the TOD and Old Town areas.

Recent real estate development trends in the urban portions of Orange and Los Angeles counties demonstrate the increasing market feasibility of multi-family and mixed-use redevelopment at densities well above 30 units/acre. As discussed above, several projects have already been approved in the Placentia TOD area at densities up to 89 units/acre. The realistic yield estimated in Table B-4 for parcels in the TOD area is assumed to be 83 units/acre, which is the average density of the three recent projects described above. In all other zones the inventory conservatively reflects a 10% reduction from the allowable number of units for each site.

### Accessory Dwelling Units

Accessory dwelling units (ADUs) represent a significant opportunity for affordable housing, particularly for single persons or small households including the elderly, college students, young adults, and caregivers. Recent changes in State law have made the construction of ADUs more feasible for homeowners, and Placentia has seen an increase in ADU development interest recently.

Over the past few years interest in ADUs has increased, and during 2018-2020 the City has approved 21 ADU permits. At that rate, it is estimated that approximately 56 additional ADUs will be approved during the 2021-2029 planning period. Based on recent analysis conducted by SCAG<sup>4</sup> over two-thirds of future ADUs are expected to be affordable to lower-income households. The assumption of 7 ADUs per year is considered to be very conservative given that in 2021 the City issued 9 ADU permits and in just the first two months of 2022 there have been 13 ADU applications submitted.

### Candidate Sites for Rezoning

As noted in Table B-1 above, the sites inventory shows a shortfall of potential capacity for 531 lower-income units and 606 above-moderate-income units. The City has identified the following 2-pronged strategy for addressing this shortfall:

1. The existing TOD area is proposed to be expanded to the west, creating capacity for more than 1,100 multi-family units. This area is currently zoned Manufacturing and encompasses approximately 14 acres. The potential capacity for this TOD expansion area assumes an

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<sup>4</sup> SCAG, Regional Accessory Dwelling Unit Affordability Analysis, 2020  
([https://scag.ca.gov/sites/main/files/file-attachments/adu\\_affordability\\_analysis\\_120120v2.pdf?1606868527](https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527))



allowable density of 95 units/acre and an average yield of 82 units/acre based on recently approved projects in the existing TOD area.

2. The existing R-3 zoning district currently allows a maximum density of 25 units/acre. The City proposes to increase the maximum density in the R-3 district to 30 units/acre. While this zoning amendments would apply to all properties in the R-3 district, only the most likely sites for development are listed in Table B-5. With a conservative 10% reduction from the proposed allowable density of 30 units/acre, these parcels would have a total capacity for approximately 363 units, an increase of 61 potential units compared to the estimated capacity under current regulations.

Program 1.8 in the Housing Plan describes the actions necessary to implement this rezoning strategy.

## Appendix B: Residential Land Inventory



**Table B-3: Vacant Sites**

Street Address	APN	General Plan	Zoning	Max Density (du/ac)	Acres	2 prior cycles?	Lower	Mod	Above Mod	Total Units
<a href="#">Natchez Ave/Erie St</a>	<a href="#">336-520-26</a>	<a href="#">Medium Density</a>	<a href="#">PUD</a>	<a href="#">15</a>	<a href="#">0.22</a>	<a href="#">Yes</a>		<a href="#">2</a>		<a href="#">2</a>
<a href="#">N. Placentia Ave/W. Palm</a>	<a href="#">337-241-63</a>	<a href="#">Medium Density</a>	<a href="#">R-1</a>	<a href="#">15</a>	<a href="#">0.14</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">209 S. Walnut</a>	<a href="#">339-361-05</a>	<a href="#">Medium Density</a>	<a href="#">R-2</a>	<a href="#">15</a>	<a href="#">0.07</a>	<a href="#">Yes</a>		<a href="#">1</a>		<a href="#">1</a>
<a href="#">307 BAKER ST</a>	<a href="#">339-392-14</a>	<a href="#">OT</a>	<a href="#">OT</a>	<a href="#">65</a>	<a href="#">0.24</a>	<a href="#">No</a>		<a href="#">13</a>		<a href="#">13</a>
<a href="#">323 BAKER ST</a>	<a href="#">339-392-19</a>	<a href="#">OT</a>	<a href="#">OT</a>	<a href="#">65</a>	<a href="#">0.15</a>	<a href="#">No</a>		<a href="#">8</a>		<a href="#">8</a>
<a href="#">S. Walnut Ave/Baker St</a>	<a href="#">339-392-20</a>	<a href="#">Medium Density</a>	<a href="#">R-2</a>	<a href="#">15</a>	<a href="#">0.15</a>	<a href="#">Yes</a>		<a href="#">2</a>		<a href="#">2</a>
<a href="#">S. Walnut Ave/Baker St</a>	<a href="#">339-392-21</a>	<a href="#">Medium Density</a>	<a href="#">R-2</a>	<a href="#">15</a>	<a href="#">0.10</a>	<a href="#">Yes</a>		<a href="#">1</a>		<a href="#">1</a>
<a href="#">230 W SANTA FE AVE</a>	<a href="#">339-393-01</a>	<a href="#">OT</a>	<a href="#">OT</a>	<a href="#">29</a>	<a href="#">0.13</a>	<a href="#">No</a>		<a href="#">3</a>		<a href="#">3</a>
<a href="#">417 W. Crowther</a>	<a href="#">339-401-03</a>	<a href="#">TOD</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">0.09</a>	<a href="#">No</a>		<a href="#">7</a>		<a href="#">7</a>
<a href="#">adjacent to 413 W. Crowther</a>	<a href="#">339-401-05</a>	<a href="#">TOD</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">0.01</a>	<a href="#">No</a>		<a href="#">1</a>		<a href="#">1</a>
<a href="#">554 Vanderbilt Drive</a>	<a href="#">340-401-28</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.16</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">548 Vanderbilt Drive</a>	<a href="#">340-401-29</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.17</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">700 De Jesus Dr.</a>	<a href="#">340-461-13</a>	<a href="#">Low Density</a>	<a href="#">PUD</a>	<a href="#">6</a>	<a href="#">0.22</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">519 Langer Drive</a>	<a href="#">340-462-13</a>	<a href="#">Low Density</a>	<a href="#">PUD</a>	<a href="#">6</a>	<a href="#">0.13</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">525 Langer Drive</a>	<a href="#">340-462-14</a>	<a href="#">Low Density</a>	<a href="#">PUD</a>	<a href="#">6</a>	<a href="#">0.11</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">531 Langer Drive</a>	<a href="#">340-462-15</a>	<a href="#">Low Density</a>	<a href="#">PUD</a>	<a href="#">6</a>	<a href="#">0.12</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">Lyons Way/Langer Drive</a>	<a href="#">340-462-16</a>	<a href="#">Low Density</a>	<a href="#">PUD</a>	<a href="#">6</a>	<a href="#">1.21</a>	<a href="#">Yes</a>			<a href="#">6</a>	<a href="#">6</a>
<a href="#">Powell/Ekenrode</a>	<a href="#">340-511-66</a>	<a href="#">Low Density</a>	<a href="#">RPC</a>	<a href="#">6</a>	<a href="#">0.26</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">Vina Del Mar/Puerto Natales Dr.</a>	<a href="#">341-022-10</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.47</a>	<a href="#">Yes</a>			<a href="#">2</a>	<a href="#">2</a>
<a href="#">Bryce Cir./Carlsbad St.</a>	<a href="#">341-042-39</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.37</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">Vina del Mar/Jefferson St</a>	<a href="#">341-042-43</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.38</a>	<a href="#">Yes</a>			<a href="#">2</a>	<a href="#">2</a>
<a href="#">Olympic Ave</a>	<a href="#">341-081-34</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.22</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">Yellowstone Ave.</a>	<a href="#">341-081-36</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.34</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">Yellowstone Ave.</a>	<a href="#">341-082-02</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.55</a>	<a href="#">Yes</a>			<a href="#">2</a>	<a href="#">2</a>
<a href="#">1150 Mammoth Circle</a>	<a href="#">341-093-02</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.23</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">1150 Mammoth Circle</a>	<a href="#">341-093-03</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.24</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">Higland/ Orchard</a>	<a href="#">341-122-83</a>	<a href="#">Medium Density</a>	<a href="#">PUD</a>	<a href="#">15</a>	<a href="#">1.13</a>	<a href="#">Yes</a>		<a href="#">15</a>		<a href="#">15</a>
<a href="#">Orangethorpe/Richfield</a>	<a href="#">341-122-89</a>	<a href="#">Medium Density</a>	<a href="#">PUD</a>	<a href="#">15</a>	<a href="#">1.45</a>	<a href="#">Yes</a>		<a href="#">19</a>		<a href="#">19</a>
<a href="#">1255 Vina Del Mar</a>	<a href="#">341-201-35</a>	<a href="#">Low Density</a>	<a href="#">R-1</a>	<a href="#">6</a>	<a href="#">0.49</a>	<a href="#">Yes</a>			<a href="#">2</a>	<a href="#">2</a>
<a href="#">Orangethorpe/Jefferson</a>	<a href="#">341-343-10</a>	<a href="#">Low Density</a>	<a href="#">SP-7</a>	<a href="#">6</a>	<a href="#">0.18</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">Orchard/Van Buren</a>	<a href="#">341-352-10</a>	<a href="#">Medium Density</a>	<a href="#">SP-7</a>	<a href="#">15</a>	<a href="#">0.23</a>	<a href="#">Yes</a>		<a href="#">3</a>		<a href="#">3</a>
<a href="#">Cherry/Van Buren</a>	<a href="#">341-352-15</a>	<a href="#">Low Density</a>	<a href="#">SP-7</a>	<a href="#">6</a>	<a href="#">0.17</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>
<a href="#">17272 Cherry</a>	<a href="#">341-354-01</a>	<a href="#">Low Density</a>	<a href="#">SP-7</a>	<a href="#">6</a>	<a href="#">0.18</a>	<a href="#">Yes</a>			<a href="#">1</a>	<a href="#">1</a>

## Appendix B: Residential Land Inventory



Street Address	APN	General Plan	Zoning	Max Density (du/ac)	Acres	2 prior cycles?	Lower	Mod	Above Mod	Total Units
17262 Cherry	341-354-02	Low Density	SP-7	6	0.26	Yes			1	1
N. Van Buren/Orchard	341-361-01	Low Density	PUD	6	0.96	Yes			5	5
N. Van Buren/Orchard	341-361-02	Low Density	SP-7	6	0.40	Yes			2	2
Willow St./Van Buren	341-362-01	Medium Density	SP-7	15	0.08	Yes		1		1
Willow St./Van Buren	341-362-02	Medium Density	SP-7	15	0.69	Yes		9		9
6200 Van Buren	341-365-02	Low Density	SP-7	6	0.14	Yes			1	1
6200 Van Buren	341-365-03	Low Density	SP-7	6	0.15	Yes			1	1
Cherry St./Van Buren	341-374-01	Medium Density	R-G	15	0.26	Yes		3		3
Cherry St./Depot St.	341-375-01	Medium Density	R-G	15	0.30	Yes		4		4
Cherry St./Van Buren	341-375-02	Medium Density	R-G	15	0.22	Yes		3		3
502 Gerhold Lane	341-421-33	Low Density	SP-7	6	0.41	Yes			2	2
1451 Howard Pl	341-431-01	Low Density	SP-7	6	0.44	Yes			2	2
406 Nevin Lane	341-433-23	Low Density	SP-7	6	0.48	Yes			2	2
Alta Vista/Van Buren	341-481-28	Medium Density	SP-7	15	1.00	Yes		13		13
164 Los Alamitos Cir.	343-682-24	Medium Density	PUD	15	0.11	Yes		1		1
Orchard/Richfield	343-712-03	Medium Density	PUD	15	0.42	Yes		5		5
Orchard/S. Caliente Way	343-712-47	Medium Density	PUD	15	0.05	Yes		1		1
Orchard/S. Caliente Way	343-712-48	Medium Density	PUD	15	0.13	Yes		1		1
Orchard/S. Caliente Way	343-712-49	Medium Density	PUD	15	0.03	Yes		1		1
Orchard/Richfield	343-712-69	Medium Density	PUD	15	0.04	Yes		1		1
Vincente/Maria Ave	346-013-02	Low Density	R-1	6	0.12	Yes			1	1
Vincente/Maria Ave	346-013-03	Low Density	R-1	6	0.13	Yes			1	1
Orangethorpe/Jefferson	346-162-01	HDR	R-3	25	0.47	No		10		10
Orangethorpe/Jefferson	346-162-02	HDR	R-3	25	4.55	No		102		102
503 S. Van Buren St.	346-164-23	HDR	R-3	25	0.21	No		4		4
560 S Van Buren	346-171-01	Low Density	R-1	6	0.65	Yes			3	3
17000 L Paloma	346-172-24	Low Density	R-1	6	0.26	Yes			1	1
La Paloma/Van Buren	346-172-26	Low Density	R-1	6	0.09	Yes			1	1
La Paloma/Van Buren	346-172-27	Low Density	R-1	6	0.09	Yes			1	1
17000 La Paloma	346-173-01	Low Density	R-1	6	0.20	Yes			1	1
17342 Atwood Ave	346-181-02	Low Density	R-1	6	0.06	Yes			1	1
Atwood/Van Buren	346-181-11	Low Density	R-1	6	0.09	Yes			1	1
Atwood/Van Buren	346-181-12	Low Density	R-1	6	0.19	Yes			1	1
Atwood/Van Buren	346-181-13	Low Density	R-1	6	0.09	Yes			1	1
Atwood/Van Buren	346-181-14	Low Density	R-1	6	0.14	Yes			1	1

## Appendix B: Residential Land Inventory



Street Address	APN	General Plan	Zoning	Max Density (du/ac)	Acres	2 prior cycles?	Lower	Mod	Above Mod	Total Units
Atwood/Lincoln	346-181-16	Low Density	R-1	6	0.10	Yes			1	1
Atwood/Lincoln	346-181-17	Low Density	R-1	6	0.10	Yes			1	1
Atwood/Lincoln	346-181-18	Low Density	R-1	6	0.09	Yes			1	1
Atwood/Lincoln	346-181-19	Low Density	R-1	6	0.09	Yes			1	1
17431 Oak St	346-181-21	Low Density	R-1	6	0.09	Yes			1	1
601 S. Lakeview Ave.	346-331-02	HDR	R-3	25	4.55	No		102		102
Lakeview Loop/Veterans Way	346-331-03	HDR	R-3	25	0.13	No		2		2
625 S. Lakeview Ave.	346-331-11	HDR	R-3	25	0.53	No		12		12
2006 E. Lakeview Loop	346-331-27	HDR	R-3	25	0.38	No		8		8
2018 E. Lakeview Loop	346-331-29	HDR	R-3	25	0.39	No		8		8
613 S. Lakeview Ave.	346-331-30	HDR	R-3	25	0.45	No		10		10
1958 E. Veterans Way	346-331-32	HDR	R-3	25	0.81	No		18		18
<b>Totals</b>					<b>31.9</b>			<b>394</b>	<b>65</b>	<b>459</b>

APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Lower	Mod	Above Mod	Total Units	Existing Use
336-520-26	Natchez Ave/Erie St	0.22	Medium Density	PUD	15		3		3	Vacant
337-241-63	N. Placentia Ave/W. Palm	0.14	Medium Density	R-1	15		2		2	Vacant
339-361-05	209 S. Walnut	0.07	Medium Density	R-2	15		1		1	Vacant
339-392-20	S. Walnut Ave/Baker St	0.15	Medium Density	R-2	15		2		2	Vacant
339-392-24	S. Walnut Ave/Baker St	0.10	Medium Density	R-2	15		1		1	Vacant
341-122-83	Highland/ Orchard	1.13	Medium Density	PUD	15		17		17	Vacant
341-122-89	Orangethorpe/Richfield	1.45	Medium Density	PUD	15		24		24	Vacant
341-352-10	Orchard/Van Buren	0.23	Medium Density	SP-7	15		3		3	Vacant
341-362-01	Willow St./Van Buren	0.08	Medium Density	SP-7	15		1		1	Vacant
341-362-02	Willow St./Van Buren	0.69	Medium Density	SP-7	15		10		10	Vacant
341-374-01	Cherry St./Van Buren	0.26	Medium Density	R-G	15		3		3	Vacant
341-375-01	Cherry St./Depot St.	0.30	Medium Density	R-G	15		4		4	Vacant
341-375-02	Cherry St./Van Buren	0.22	Medium Density	R-G	15		3		3	Vacant
341-481-28	Alta Vista/Van Buren	1.00	Medium Density	SP-7	15		15		15	Vacant
343-712-47	Orchard/S. Caliente Way	0.05	Medium Density	PUD	15		1		1	Vacant
343-712-48	Orchard/S. Caliente Way	0.13	Medium Density	PUD	15		1		1	Vacant
343-712-49	Orchard/S. Caliente Way	0.03	Medium Density	PUD	15		1		1	Vacant
343-712-69	Orchard/Richfield	0.04	Medium Density	PUD	15		1		1	Vacant

## Appendix B: Residential Land Inventory



APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Lower	Mod	Above Mod	Total Units	Existing Use
343-682-24	164 Los Alamitos Cir.	0.11	Medium-Density	PUD	15		1		1	Vacant
343-712-03	Orchard/Richfield	0.42	Medium-Density	PUD	15		6		6	Vacant
340-461-13	700 De Jesus Dr.	0.22	Low-Density	PUD	6			1	1	Vacant
340-511-66	Powell/Ekenrode	0.26	Low-Density	RPC	6			1	1	Vacant
341-022-10	Vina Del Mar/Puerto Natales	0.47	Low-Density	R-1	6			2	2	Vacant
341-042-39	Bryce Cir./Carlsbad St.	0.37	Low-Density	R-1	6			2	2	Vacant
341-042-43	Vina del Mar/Jefferson St	0.38	Low-Density	R-1	6			2	2	Vacant
341-081-34	Olympic Ave	0.22	Low-Density	R-1	6			1	1	Vacant
341-081-36	Yellowstone Ave.	0.34	Low-Density	R-1	6			2	2	Vacant
341-082-02	Yellowstone Ave.	0.55	Low-Density	R-1	6			3	3	Vacant
341-093-02	1150 Mammoth Circle	0.23	Low-Density	R-1	6			1	1	Vacant
341-093-03	1150 Mammoth Circle	0.24	Low-Density	R-1	6			1	1	Vacant
341-201-35	1255 Vina Del Mar	0.49	Low-Density	R-1	6			2	2	Vacant
341-343-10	Orangethorpe/Jefferson	0.18	Low-Density	SP-7	6			1	1	Vacant
341-352-15	Cherry/Van Buren	0.17	Low-Density	SP-7	6			1	1	Vacant
341-354-01	17272 Cherry	0.18	Low-Density	SP-7	6			1	1	Vacant
341-354-02	17262 Cherry	0.26	Low-Density	SP-7	6			1	1	Vacant
341-361-01	N. Van Buren/Orchard	0.96	Low-Density	PUD	6			5	5	Vacant
341-361-02	N. Van Buren/Orchard	0.40	Low-Density	SP-7	6			2	2	Vacant
341-421-33	502 Gerhold Lane	0.41	Low-Density	SP-7	6			2	2	Vacant
341-431-01	1451 Howard Pl	0.44	Low-Density	SP-7	6			2	2	Vacant
341-433-23	406 Nevin Lane	0.48	Low-Density	SP-7	6			2	2	Vacant
346-171-01	560 S Van Buren	0.65	Low-Density	R-1	6			3	3	Vacant
346-172-24	17000 L Paloma	0.26	Low-Density	R-1	6			1	1	Vacant
346-173-01	17000 La Paloma	0.20	Low-Density	R-1	6			1	1	Vacant
340-401-28	554 Vanderbilt Drive	0.16	Low-Density	R-1	6			1	1	Vacant
340-401-29	548 Vanderbilt Drive	0.17	Low-Density	R-1	6			1	1	Vacant
340-462-13	519 Langer Drive	0.13	Low-Density	PUD	6			1	1	Vacant
340-462-14	525 Langer Drive	0.11	Low-Density	PUD	6			1	1	Vacant
340-462-15	531 Langer Drive	0.12	Low-Density	PUD	6			1	1	Vacant
340-462-16	Lyons Way/Langer Drive	1.21	Low-Density	PUD	6			7	7	Vacant
341-365-02	6200 Van Buren	0.14	Low-Density	SP-7	6			1	1	Vacant
341-365-03	6200 Van Buren	0.15	Low-Density	SP-7	6			1	1	Vacant
346-013-02	Vincento/Maria Ave	0.12	Low-Density	R-1	6			1	1	Vacant
346-013-03	Vincento/Maria Ave	0.13	Low-Density	R-1	6			1	1	Vacant

## Appendix B: Residential Land Inventory



APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Lower	Mod	Above Mod	Total Units	Existing Use
346-172-26	La Paloma/Van Buren	0.09	Low-Density	R-1	6			1	1	Vacant
346-172-27	La Paloma/Van Buren	0.09	Low-Density	R-1	6			1	1	Vacant
346-181-02	17342 Atwood Ave	0.06	Low-Density	R-1	6			1	1	Vacant
346-181-11	Atwood/Van Buren	0.09	Low-Density	R-1	6			1	1	Vacant
346-181-12	Atwood/Van Buren	0.19	Low-Density	R-1	6			1	1	Vacant
346-181-13	Atwood/Van Buren	0.09	Low-Density	R-1	6			1	1	Vacant
346-181-14	Atwood/Van Buren	0.14	Low-Density	R-1	6			1	1	vacant
346-181-16	Atwood/Lincoln	0.10	Low-Density	R-1	6			1	1	Vacant
346-181-17	Atwood/Lincoln	0.10	Low-Density	R-1	6			1	1	Vacant
346-181-18	Atwood/Lincoln	0.09	Low-Density	R-1	6			1	1	Vacant
346-181-19	Atwood/Lincoln	0.09	Low-Density	R-1	6			1	1	Vacant
346-181-21	17431 Oak St	0.09	Low-Density	R-1	6			1	1	Vacant
339-401-03	417 W. Crowther	0.09	TOD	TOD	95	8			8	Vacant
339-401-05	adjacent to 413 W. Crowther	0.01	TOD	TOD	95	1		1	1	Vacant
339-394-07	100 W SANTA FE AVE	0.07	OT	OT	29		2		2	Parking Lot
339-394-06	110 W SANTA FE AVE	0.05	OT	OT	29		1		1	Parking Lot
339-392-14	307 BAKER ST	0.24	OT	OT	65		15		15	Vacant
339-394-01	132 W SANTA FE AVE	0.09	OT	OT	29		2		2	
339-061-07	234 S BRADFORD AVE	0.17	OT	OT	29		4		4	Parking Lot
339-365-18	219 1/2 S BRADFORD AVE	0.15	OT	OT	29		4		4	
339-355-13	145 S BRADFORD AVE	0.29	OT	OT	35		10		10	
339-365-10	141 W SANTA FE AVE	0.34	OT	OT	29		9		9	
339-365-27	Same parcel as above	0.34	OT	OT			1		1	
339-365-15	235 S BRADFORD AVE	0.09	OT	OT	29		2		2	Parking Lot
339-392-19	323 BAKER ST	0.15	OT	OT	65		9		9	Vacant
339-393-02	226 W SANTA FE AVE	0.06	OT	OT	29		1		1	
339-364-16	203 W SANTA FE AVE	0.09	OT	OT	29		2		2	
339-365-09	234 S MAIN ST	0.09	OT	OT	29		2		2	
339-393-01	230 W SANTA FE AVE	0.13	OT	OT	29		3		3	Vacant
339-364-12	221 W SANTA FE AVE	0.05	OT	OT	29		1		1	
339-052-28	120 S BRADFORD AVE	0.20	OT	OT	35		6		6	
339-052-29	120 S BRADFORD AVE	0.20	OT	OT	35		6		6	
339-355-17	121 S BRADFORD AVE	0.15	OT	OT	35		5		5	Parking Lot
339-392-10	314 W SANTA FE AVE	0.04	OT	OT	35		1		1	
339-392-11	310 W SANTA FE AVE	0.07	OT	OT	35		2		2	

## Appendix B: Residential Land Inventory



APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Lower	Mod	Above Mod	Total Units	Existing Use
339-363-12	333 W SANTA FE AVE	0.06	OT	OT	35		2		2	Parking Lot
339-363-13	329 W SANTA FE AVE	0.06	OT	OT	35		2		2	Parking Lot
346-331-32	1958 E. Veterans Way	0.81	HDR	R-3	25		20		20	Vacant
346-331-27	2006 E. Lakeview Loop	0.38	HDR	R-3	25		9		9	Vacant
346-331-29	2018 E. Lakeview Loop	0.39	HDR	R-3	25		9		9	Vacant
346-331-02	601 S. Lakeview Ave.	4.55	HDR	R-3	25		113		113	Vacant
346-331-30	613 S. Lakeview Ave.	0.45	HDR	R-3	25		11		11	Vacant
346-331-11	625 S. Lakeview Ave.	0.53	HDR	R-3	25		13		13	Vacant
346-331-03	Lakeview Loop/Veterans Way	0.13	HDR	R-3	25		3		3	Vacant
346-164-23	503 S. Van Buren St.	0.21	HDR	R-3	25		5		5	Vacant
346-162-02	Orangethorpe/Jefferson	4.55	HDR	R-3	25		113		113	Vacant
346-162-01	Orangethorpe/Jefferson	0.47	HDR	R-3	25		11		11	Vacant
						0	496	69	573	

## Appendix B: Residential Land Inventory



**Table B-4: Underutilized Sites**

APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
343-691-06	Orchard/Highland	4.13	MDR	R-G	15	16	-	39	-	55	39	16 Units	No
339-401-16	Crowther/Melrose	3.24	TOD	TOD	95	-	268	-	-	268	268	Packing House	Yes
339-401-01	425 W. Crowther	0.06	TOD	TOD	95	1	-	3	-	4	3	Residential, Single Family Home	Yes
339-401-02	421 W. Crowther	0.11	TOD	TOD	95	1	-	8	-	9	8	Residential, Single Family Home	Yes
339-401-06	415 Goetz Place	0.14	TOD	TOD	95	1	-	10	-	11	10	Residential, Single Family Home	Yes
339-401-07	411 Goetz Place	0.06	TOD	TOD	95	1	-	3	-	4	3	Residential, Single Family Home	Yes
339-401-10	408 Goetz Place	0.13	TOD	TOD	95	3	-	7	-	10	7	Residential, 3 units	Yes
339-401-13	409 W. Crowther	0.09	TOD	TOD	95	1	-	6	-	7	6	Residential, Single Family Home	Yes
339-063-01	101 E. Crowther	0.6	TOD	TOD	95	-	49	-	-	49	49	Parking Lot	No
339-063-02	125 E. Crowther	0.25	TOD	TOD	95	-	-	20	-	20	20	Parking Lot	No
339-402-15	Crowther	0.1	TOD	TOD	95	-	-	8	-	8	8	Parking Lot	No
339-401-14	405 W. Crowther	0.1	TOD	TOD	95	1	-	7	-	8	7	Residential, Single Family Home	Yes
339-401-11	417 Evelyn Place	0.13	TOD	TOD	95	-	-	10	-	10	10	parking lot utilized by surrounding residential	Yes
339-401-12	adjacent to 417 Evelyn Place	0.13	TOD	TOD	95	-	-	10	-	10	10	parking lot utilized by surrounding residential	Yes
339-401-04	Crowther/Goetz	0.08	TOD	TOD	95	1	-	5	-	6	5	SF home	Yes
339-431-01	551 W. Crowther	1.35	TOD	TOD	95	-	112	-	-	112	112	Tyler Lighting - Industrial building	Yes
339-402-04	Crowther/Pedestrian Bridge	-	TOD	TOD	95	-	-	-	-	0	0	Golden State Water Well	No
339-091-20	190 W. Crowther	5.91	TOD	TOD	95	-	490	-	-	490	490	Industrial Building	No
339-401-15	Crowther/Evelyn	0.13	TOD	TOD	95	-	-	10	-	10	10	-	Yes
339-394-05	116 W SANTA FE AVE #B	0.05	OT	OT	29	-	-	1	-	1	1	Office	No
339-394-04	118 W SANTA FE AVE #A13	0.06	OT	OT	29	-	-	1	-	1	1	Restaurant	No
339-394-03	126 W SANTA FE AVE	0.14	OT	OT	29	-	-	3	-	3	3	Retail	No
339-365-26	101 W SANTA FE AVE	0.11	OT	OT	29	-	-	2	-	2	2	Restaurant	No
339-364-10	233 W SANTA FE AVE	0.14	OT	OT	29	-	-	3	-	3	3	Glass Repair Shop	No
339-365-08	232 S MAIN ST	0.13	OT	OT	29	-	-	3	-	3	3	Residential, Multi-family	No
339-365-17	225 S BRADFORD AVE	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-061-05	220 S BRADFORD AVE	0.26	OT	OT	29	-	-	6	-	6	6	Restaurant	No
339-362-05	233 S WALNUT AVE	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-365-21	209 S BRADFORD AVE	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-061-02	206 S BRADFORD AVE	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-394-02	128 W SANTA FE AVE	0.17	OT	OT	29	-	-	4	-	4	4	Existing Use, Commercial	No
339-394-01	132 W SANTA FE AVE	0.09	OT	OT	29	-	-	2	-	2	2	Existing Use, Commercial	No
339-365-25	109 W SANTA FE AVE	0.17	OT	OT	29	-	-	4	-	4	4	Existing Use, Commercial	No
339-365-03	210 S MAIN ST	0.15	OT	OT	29	-	-	3	-	3	3	Residential, Multi-family	No
339-061-01	204 S BRADFORD AVE	0.14	OT	OT	29	-	-	3	-	3	3	Residential, Condo	No
339-365-22	205 S BRADFORD AVE	0.15	OT	OT	29	-	-	3	-	3	3	Residential, Multi-family	No

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APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-365-07	226 S MAIN ST	0.15	OT	OT	29	-	-	3	-	3	3	Residential, Multi-family	No
339-365-18	219 1/2 S BRADFORD AVE	0.15	OT	OT	29	1	-	2	-	3	2	Existing Use, SF Home	No
339-355-11	144 S MAIN ST	0.1	OT	OT	35	1	-	2	-	3	2	Residential, Single Family Home	No
339-355-13	145 S BRADFORD AVE	0.29	OT	OT	35	1	-	8	-	9	8	Existing Use, SF Home	No
339-365-10	141 W SANTA FE AVE	0.34	OT	OT	29	-	-	8	-	8	8	Existing Use, Commercial	No
339-365-27	Same parcel as above	0.34	OT	OT	29	-	-	8	-	8	8	Existing Use, Commercial	No
339-061-06	228 S BRADFORD AVE	0.15	OT	OT	29	-	-	3	-	3	3	Existing Use- American Legion	No
339-365-06	224 S MAIN ST	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-355-10	140 S MAIN ST	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-355-14	137 S BRADFORD AVE	0.15	OT	OT	35	-	-	4	-	4	4	Existing Use- Commercial	No
339-052-27	132 S BRADFORD AVE	0.31	OT	OT	35	-	-	9	-	9	9	Existing Use- Commercial	No
339-365-19	217 S BRADFORD AVE	0.12	OT	OT	29	-	-	3	-	3	3	Existing Use- Commercial	No
339-061-04	214 S BRADFORD AVE	0.28	OT	OT	29	-	-	7	-	7	7	Existing Use- Commercial	No
339-365-05	218 S MAIN ST	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-365-02	206 S MAIN ST	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-365-23	201 S BRADFORD AVE	0.12	OT	OT	29	-	-	3	-	3	3	Existing Use- Restaurant	No
339-365-01	202 S MAIN ST	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-052-26	144 S BRADFORD AVE	0.31	OT	OT	35	-	-	9	-	9	9	Existing Use- Commercial	No
339-392-13	313 S MELROSE ST	0.06	OT	OT	65	1	-	2	-	3	2	Residential, Single Family Home	No
339-392-16	311 BAKER ST	0.15	OT	OT	65	1	-	7	-	8	7	Residential, Single Family Home	No
339-391-15	312 BAKER ST	0.27	OT	OT	65	1	-	14	-	15	14	Residential, Single Family Home	No
339-391-14	314 BAKER ST	0.14	OT	OT	65	1	-	7	-	8	7	Residential, Single Family Home	No
339-391-13	320 BAKER ST	0.16	OT	OT	65	1	-	8	-	9	8	Residential, Single Family Home	No
339-393-08	202 W SANTA FE AVE	0.13	OT	OT	29	-	-	3	-	3	3	Existing Use- Commercial	No
339-393-07	214 W SANTA FE AVE	0.06	OT	OT	29	-	-	1	-	1	1	Existing Use- Restaurant	No
339-392-17	315 BAKER ST	0.15	OT	OT	65	1	-	7	-	8	7	Residential, Single Family Home	No
339-393-06	216 W SANTA FE AVE	0.06	OT	OT	29	-	-	1	-	1	1	Existing Use- Commercial	No
339-393-05	220 W SANTA FE AVE	0.06	OT	OT	29	-	-	1	-	1	1	Existing Use- Commercial	No
339-392-18	319 BAKER ST	0.15	OT	OT	65	1	-	7	-	8	7	Residential, Single Family Home	No
339-393-04	222 W SANTA FE AVE	0.06	OT	OT	29	-	-	1	-	1	1	Existing Use- Commercial	No
339-393-03	224 W SANTA FE AVE	0.06	OT	OT	29	-	-	1	-	1	1	Existing Use- Commercial	No
339-393-02	226 W SANTA FE AVE	0.06	OT	OT	29	-	-	1	-	1	1	Existing Use, Commercial	No
339-364-16	203 W SANTA FE AVE	0.09	OT	OT	29	-	-	2	-	2	2	Existing Use, Commercial	No
339-364-15	209 W SANTA FE AVE	0.05	OT	OT	29	-	-	1	-	1	1	Existing Use- Commercial	No
339-364-13	215 W SANTA FE AVE	0.05	OT	OT	29	-	-	1	-	1	1	Existing Use- Commercial	No
339-365-09	234 S MAIN ST	0.09	OT	OT	29	1	-	1	-	2	1	Existing Use, SF Home	No
339-391-12	322 BAKER ST	0.16	OT	OT	65	-	-	9	-	9	9	Residential, Multi-family	No

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APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-391-11	326 BAKER ST	0.16	OT	OT	65	-	-	9	-	9	9	Residential, Multi-family	No
339-391-10	332 BAKER ST	0.16	OT	OT	65	1	-	8	-	9	8	Residential, Single Family Home	No
339-391-09	334 BAKER ST	0.16	OT	OT	65	1	-	8	-	9	8	Residential, Single Family Home	No
339-061-08	238 S BRADFORD AVE	0.18	OT	OT	29	-	-	4	-	4	4	Existing Use- Commercial	No
339-364-12	221 W SANTA FE AVE	0.05	OT	OT	29	-	-	1	-	1	1	Existing Use, Commercial	No
339-365-16	229 S BRADFORD AVE	0.13	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-364-11	229 W SANTA FE AVE	0.09	OT	OT	29	-	-	2	-	2	2	Existing Use- Commercial	No
339-362-06	239 S WALNUT AVE	0.18	OT	OT	35	1	-	4	-	5	4	Residential, Single Family Home	No
339-365-20	211 S BRADFORD AVE	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-061-03	200 S BRADFORD AVE	0.15	OT	OT	29	-	-	3	-	3	3	Existing Use- Commercial	No
339-365-04	216 S MAIN ST	0.15	OT	OT	29	1	-	2	-	3	2	Residential, Single Family Home	No
339-355-09	134 S MAIN ST	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-355-15	131 S BRADFORD AVE	0.15	OT	OT	35	-	-	4	-	4	4	Existing Use- Commercial	No
339-052-28	120 S BRADFORD AVE	0.2	OT	OT	35	-	-	6	-	6	6	Existing Use, Residential	No
339-052-29	120 S BRADFORD AVE	0.2	OT	OT	35	-	-	6	-	6	6	Existing Use, Residential	No
339-355-08	132 S MAIN ST	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-355-16	125 S BRADFORD AVE	0.15	OT	OT	35	-	-	4	-	4	4	Existing Use- Commercial	No
339-355-07	126 S MAIN ST #A	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-052-24	110 S BRADFORD AVE	0.22	OT	OT	35	-	-	6	-	6	6	Existing Use- Commercial	No
339-355-06	122 S MAIN ST	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-355-18	117 S BRADFORD AVE	0.12	OT	OT	35	-	-	3	-	3	3	Existing Use- Commercial	No
339-355-05	118 S MAIN ST	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-355-19	113 S BRADFORD AVE	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-355-04	114 S MAIN ST	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-052-21	102 S BRADFORD AVE	1.81	OT	OT	55	-	89	-	-	89	89	Existing Use- Church	No
339-355-03	110 S MAIN ST	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-355-20	100 W CHAPMAN AVE	0.32	OT	OT	35	-	-	10	-	10	10	Existing Use- Commercial	No
339-355-02	106 S MAIN ST	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-355-22	CHAPMAN/MAIN	0.13	OT	OT	35	-	-	4	-	4	4	Placentia Water Tower	No
339-392-02	350 W SANTA FE AVE	0.14	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-392-01	352 W SANTA FE AVE	0.14	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-392-22	320 S WALNUT AVE	0.1	OT	OT	65	-	-	5	-	5	5	Existing Use- Commercial	No
339-392-12	305 S MELROSE ST	0.11	OT	OT	35	-	-	3	-	3	3	Existing Use- Commercial	No
339-392-04	338 W SANTA FE AVE	0.06	OT	OT	35	-	-	1	-	1	1	Residential, Multi-family	No
339-392-07	330 W SANTA FE AVE	0.06	OT	OT	35	-	-	1	-	1	1	Existing Use- Commercial	No
339-392-09	322 W SANTA FE AVE	0.11	OT	OT	35	-	-	3	-	3	3	Existing Use- Commercial	No
339-392-08	326 W SANTA FE AVE	0.06	OT	OT	35	-	-	1	-	1	1	Existing Use- Commercial	No

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APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-392-10	314 W SANTA FE AVE	0.04	OT	OT	35	-	-	1	-	1	1	Existing Use, Residential	No
339-392-11	310 W SANTA FE AVE	0.07	OT	OT	35	-	-	2	-	2	2	Existing Use, Residential	No
339-363-09	232 S WALNUT AVE	0.15	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-363-10	349 W SANTA FE AVE	0.15	OT	OT	35	-	-	4	-	4	4	Residential, Multi-family	No
339-363-19	301 W SANTA FE AVE	0.06	OT	OT	35	-	-	1	-	1	1	Existing Use- Commercial	No
339-363-11	341 W SANTA FE AVE	0.17	OT	OT	35	1	-	4	-	5	4	Residential, Single Family Home	No
339-363-29	325 W SANTA FE AVE	0.11	OT	OT	35	1	-	2	-	3	2	Residential, Single Family Home	No
339-363-18	307 W SANTA FE AVE	0.11	OT	OT	35	-	-	3	-	3	3	Residential, Multi-family	No
339-391-16	400 BAKER ST	1.61	OT	OT	65	-	94	-	-	94	94	Residential, Apartment	No
339-391-16	400 BAKER ST	0.16	OT	OT	65	-	-	9	-	9	9	Residential, Apartment	No
339-391-06	321 S WALNUT AVE	0.14	OT	OT	65	-	-	8	-	8	8	Residential, Multi-family	No
339-391-01	412 W SANTA FE AVE	0.13	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-391-02	307 S WALNUT AVE	0.13	OT	OT	35	1	-	3	-	4	3	Residential, Single Family Home	No
339-391-03	311 S WALNUT AVE	0.13	OT	OT	35	-	-	4	-	4	4	Residential, Multi-family	No
339-391-04	315 S WALNUT AVE	0.13	OT	OT	65	1	-	6	-	7	6	Residential, Single Family Home	No
339-391-05	319 S WALNUT AVE	0.14	OT	OT	65	1	-	7	-	8	7	Residential, Single Family Home	No
346-331-07	1952 E. Veterans Way	0.78	HDR	R-3	25	-	-	17	-	17	17	industrial	No
346-164-24	513 S. Van Buren St.	0.17	HDR	R-3	25	1	-	2	-	3	2	house	No
339-052-28	120 S BRADFORD AVE	0.20	OT	OT	35	-	-	6	-	6	6	Commercial	No
339-052-29	120 S BRADFORD AVE	0.20	OT	OT	35	-	-	6	-	6	6	Commercial	No
339-061-07	234 S BRADFORD AVE	0.17	OT	OT	29	-	-	4	-	4	4	Parking lot	No
339-355-13	145 S BRADFORD AVE	0.29	OT	OT	35	-	-	9	-	9	9	Commercial	No
339-355-17	121 S BRADFORD AVE	0.15	OT	OT	35	-	-	4	-	4	4	Parking lot	No
339-363-12	333 W SANTA FE AVE	0.06	OT	OT	35	-	-	1	-	1	1	Parking Lot	No
339-363-13	329 W SANTA FE AVE	0.06	OT	OT	35	-	-	1	-	1	1	Parking Lot	No
339-364-12	221 W SANTA FE AVE	0.05	OT	OT	29	-	-	1	-	1	1	Commercial	No
339-364-16	203 W SANTA FE AVE	0.09	OT	OT	29	-	-	2	-	2	2	Commercial	No
339-365-09	234 S MAIN ST	0.09	OT	OT	29	-	-	2	-	2	2	Commercial	No
339-365-10	141 W SANTA FE AVE	0.34	OT	OT	29	-	-	8	-	8	8	Commercial	No
339-365-15	235 S BRADFORD AVE	0.09	OT	OT	29	-	-	2	-	2	2	Parking Lot	No
339-365-18	219 1/2 S BRADFORD AVE	0.15	OT	OT	29	-	-	3	-	3	3	Commercial	No
339-392-10	314 W SANTA FE AVE	0.04	OT	OT	35	-	-	1	-	1	1	Commercial	No
339-392-11	310 W SANTA FE AVE	0.07	OT	OT	35	-	-	2	-	2	2	Commercial	No
339-393-02	226 W SANTA FE AVE	0.06	OT	OT	29	-	-	1	-	1	1	Commercial	No
339-394-01	132 W SANTA FE AVE	0.09	OT	OT	29	-	-	2	-	2	2	Commercial	No
339-394-06	110 W SANTA FE AVE	0.05	OT	OT	29	-	-	1	-	1	1	Parking Lot	No
339-394-07	100 W SANTA FE AVE	0.07	OT	OT	29	-	-	1	-	1	1	Parking Lot	No

## Appendix B: Residential Land Inventory



APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
		38.4				71	1,102	618	0	1,791	1,720		

APN	Street Address	Acres	General Plan	Zoning	Allowable Density (du/ac)	Lower	Mod	Above Mod	Net	Existing Use
339-364-18	229 S. Main St	0.13	Medium Density	R-2	15		2		2	Duplex – 2 units
343-691-06	Orchard/Highland	4.13	Medium Density	R-G	15		46		46	16 Units
346-181-21	17431 Oak St	0.09	Low Density	R-1	6			0	0	Residential, SF Home
339-401-16	Crowther/Melrose	3.24	TOD	TOD	95	307			307	Packing House
339-401-01	425 W. Crowther	0.06	TOD	TOD	95		4		4	Residential, Single Family Home
339-401-02	421 W. Crowther	0.11	TOD	TOD	95		9		9	Residential, Single Family Home
339-401-06	415 Goetz Place	0.14	TOD	TOD	95		12		12	Residential, Single Family Home
339-401-07	411 Goetz Place	0.06	TOD	TOD	95		4		4	Residential, Single Family Home
339-401-10	408 Goetz Place	0.13	TOD	TOD	95		9		9	Residential, 3 units
339-401-13	409 W. Crowther	0.09	TOD	TOD	95		7		7	Residential, Single Family Home
339-063-01	101 E. Crowther	0.60	TOD	TOD	95	56			56	Parking Lot
339-063-02	125 E. Crowther	0.25	TOD	TOD	95		23		23	Parking Lot
339-402-15	Crowther	0.10	TOD	TOD	95		9		9	Parking Lot
339-401-14	405 W. Crowther	0.10	TOD	TOD	95		8		8	Residential, Single Family Home
339-401-11	417 Evelyn Place	0.13	TOD	TOD	95		0		0	parking lot utilized by surrounding residential
339-401-12	adjacent to 417 Evelyn Place	0.13	TOD	TOD	95		0		0	parking lot utilized by surrounding residential
339-401-04	Crowther/Goetz	0.08	TOD	TOD	95		4		4	SF home
339-431-01	551 W. Crowther	1.35	TOD	TOD	95	128			128	Tyler Lighting – Industrial building
339-402-04	Crowther/Pedestrian Bridge		TOD	TOD	95				0	Golden State Water Well
339-091-20	190 W. Crowther	5.91	TOD	TOD	95	564			564	Industrial Building
339-401-15	Crowther/Evelyn	0.13	TOD	TOD	95		12		12	-
339-394-05	116 W SANTA FE AVE #B	0.05	OT	OT	29		1		1	Office
339-394-04	118 W SANTA FE AVE #A13	0.06	OT	OT	29		1		1	Restaurant
339-394-03	126 W SANTA FE AVE	0.14	OT	OT	29		4		4	Retail
339-365-26	101 W SANTA FE AVE	0.14	OT	OT	29		3		3	Restaurant
339-364-10	233 W SANTA FE AVE	0.14	OT	OT	29		3		3	Glass Repair Shop
339-365-08	232 S MAIN ST	0.13	OT	OT	29		3		3	Residential, Multi-family
339-365-17	225 S BRADFORD AVE	0.15	OT	OT	29		3		3	Residential, Single Family Home

## Appendix B: Residential Land Inventory



APN	Street-Address	Acre	General-Plan	Zoning	Allowable Density (du/ac)	Lower	Med	Above Med	Net	Existing-Use
339-061-05	220 S BRADFORD AVE	0.26	OT	OT	29		7		7	Restaurant
339-362-05	233 S WALNUT AVE	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-365-21	209 S BRADFORD AVE	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-061-02	206 S BRADFORD AVE	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-394-02	128 W SANTA FE AVE	0.17	OT	OT	29		5		5	Existing Use, Commercial
339-394-01	132 W SANTA FE AVE	0.09	OT	OT	29		2		2	Existing Use, Commercial
339-365-25	109 W SANTA FE AVE	0.17	OT	OT	29		5		5	Existing Use, Commercial
339-365-03	210 S MAIN ST	0.15	OT	OT	29		4		4	Residential, Multi-family
339-061-01	204 S BRADFORD AVE	0.14	OT	OT	29		3		3	Residential, Condo
339-365-22	205 S BRADFORD AVE	0.15	OT	OT	29		4		4	Residential, Multi-family
339-365-07	226 S MAIN ST	0.15	OT	OT	29		4		4	Residential, Multi-family
339-365-18	219 1/2 S BRADFORD AVE	0.15	OT	OT	29		4		4	Existing Use, SF Home
339-355-12	131 W CENTER ST	0.05	OT	OT	35		0		0	Residential, Single Family Home
339-355-11	144 S MAIN ST	0.10	OT	OT	35		2		2	Residential, Single Family Home
339-355-13	145 S BRADFORD AVE	0.29	OT	OT	35		10		10	Existing Use, SF Home
339-365-10	141 W SANTA FE AVE	0.34	OT	OT	29		9		9	Existing Use, Commercial
339-365-27	Same parcel as above	0.34	OT	OT	29		9		9	Existing Use, Commercial
339-061-06	228 S BRADFORD AVE	0.15	OT	OT	29		4		4	Existing Use - American Legion
339-365-06	224 S MAIN ST	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-355-10	140 S MAIN ST	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-355-14	137 S BRADFORD AVE	0.15	OT	OT	35		5		5	Existing Use - Commercial
339-052-27	132 S BRADFORD AVE	0.31	OT	OT	35		10		10	Existing Use - Commercial
339-365-19	217 S BRADFORD AVE	0.12	OT	OT	29		3		3	Existing Use - Commercial
339-061-04	214 S BRADFORD AVE	0.28	OT	OT	29		8		8	Existing Use - Commercial
339-365-05	218 S MAIN ST	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-365-02	206 S MAIN ST	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-365-23	201 S BRADFORD AVE	0.12	OT	OT	29		3		3	Existing Use - Restaurant
339-365-01	202 S MAIN ST	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-052-26	144 S BRADFORD AVE	0.31	OT	OT	35		10		10	Existing Use - Commercial
339-392-13	313 S MELROSE ST	0.06	OT	OT	65		2		2	Residential, Single Family Home
339-392-16	311 BAKER ST	0.15	OT	OT	65		8		8	Residential, Single Family Home
339-391-15	312 BAKER ST	0.27	OT	OT	65		16		16	Residential, Single Family Home
339-391-14	314 BAKER ST	0.14	OT	OT	65		8		8	Residential, Single Family Home
339-391-13	320 BAKER ST	0.16	OT	OT	65		9		9	Residential, Single Family Home
339-393-08	202 W SANTA FE AVE	0.13	OT	OT	29		3		3	Existing Use - Commercial
339-393-07	214 W SANTA FE AVE	0.06	OT	OT	29		1		1	Existing Use - Restaurant
339-392-17	315 BAKER ST	0.15	OT	OT	65		8		8	Residential, Single Family Home

## Appendix B: Residential Land Inventory



APN	Street-Address	Aeres	General-Plan	Zoning	Allowable Density (du/ac)	Lower	Med	Above Med	Net	Existing-Use
339-393-06	216 W SANTA FE AVE	0.06	OT	OT	29		4		4	Existing-Use- Commercial
339-393-05	220 W SANTA FE AVE	0.06	OT	OT	29		4		4	Existing-Use- Commercial
339-392-18	319 BAKER ST	0.15	OT	OT	65		8		8	Residential, Single Family Home
339-393-04	222 W SANTA FE AVE	0.06	OT	OT	29		4		4	Existing-Use- Commercial
339-393-03	224 W SANTA FE AVE	0.06	OT	OT	29		4		4	Existing-Use- Commercial
339-393-02	226 W SANTA FE AVE	0.06	OT	OT	29		4		4	Existing-Use, Commercial
339-364-16	203 W SANTA FE AVE	0.09	OT	OT	29		2		2	Existing-Use, Commercial
339-364-15	209 W SANTA FE AVE	0.05	OT	OT	29		4		4	Existing-Use- Commercial
339-364-14	211 W SANTA FE AVE	0.05	OT	OT	29		0		0	Residential, Single Family Home
339-364-13	215 W SANTA FE AVE	0.05	OT	OT	29		4		4	Existing-Use- Commercial
339-365-09	234 S MAIN ST	0.09	OT	OT	29		2		2	Existing-Use, SF Home
339-391-12	322 BAKER ST	0.16	OT	OT	65		10		10	Residential, Multi family
339-391-11	326 BAKER ST	0.16	OT	OT	65		10		10	Residential, Multi family
339-391-10	332 BAKER ST	0.16	OT	OT	65		9		9	Residential, Single Family Home
339-391-09	334 BAKER ST	0.16	OT	OT	65		9		9	Residential, Single Family Home
339-061-08	238 S BRADFORD AVE	0.18	OT	OT	29		5		5	Existing-Use- Commercial
339-364-12	221 W SANTA FE AVE	0.05	OT	OT	29		4		4	Existing-Use, Commercial
339-365-16	229 S BRADFORD AVE	0.13	OT	OT	29		2		2	Residential, Single Family Home
339-364-11	229 W SANTA FE AVE	0.09	OT	OT	29		2		2	Existing-Use- Commercial
339-362-06	239 S WALNUT AVE	0.18	OT	OT	35		5		5	Residential, Single Family Home
339-365-20	211 S BRADFORD AVE	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-061-03	200 S BRADFORD AVE	0.15	OT	OT	29		4		4	Existing-Use- Commercial
339-365-04	216 S MAIN ST	0.15	OT	OT	29		3		3	Residential, Single Family Home
339-355-09	134 S MAIN ST	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-355-15	131 S BRADFORD AVE	0.15	OT	OT	35		5		5	Existing-Use- Commercial
339-052-28	120 S BRADFORD AVE	0.20	OT	OT	35		6		6	Existing-Use, Residential
339-052-29	120 S BRADFORD AVE	0.20	OT	OT	35		6		6	Existing-Use, Residential
339-355-08	132 S MAIN ST	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-355-16	125 S BRADFORD AVE	0.15	OT	OT	35		5		5	Existing-Use- Commercial
339-355-07	126 S MAIN ST #A	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-052-24	110 S BRADFORD AVE	0.22	OT	OT	35		7		7	Existing-Use- Commercial
339-355-06	122 S MAIN ST	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-355-18	117 S BRADFORD AVE	0.12	OT	OT	35		4		4	Existing-Use- Commercial
339-355-05	118 S MAIN ST	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-355-19	113 S BRADFORD AVE	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-355-04	114 S MAIN ST	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-052-21	102 S BRADFORD AVE	1.84	OT	OT	55	99			99	Existing-Use- Church
339-355-03	110 S MAIN ST	0.15	OT	OT	35		4		4	Residential, Single Family Home

## Appendix B: Residential Land Inventory



APN	Street-Address	Acre	General-Plan	Zoning	Allowable Density (du/ac)	Lower	Med	Above Med	Net	Existing-Use
339-355-20	100 W CHAPMAN AVE	0.32	OT	OT	35		44		44	Existing-Use- Commercial
339-355-02	106 S MAIN ST	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-355-22	CHAPMAN/MAIN	0.13	OT	OT	35		4		4	Placentia Water Tower
339-392-02	350 W SANTA FE AVE	0.14	OT	OT	35		3		3	Residential, Single Family Home
339-392-04	352 W SANTA FE AVE	0.14	OT	OT	35		3		3	Residential, Single Family Home
339-392-22	320 S WALNUT AVE	0.10	OT	OT	65		6		6	Existing-Use- Commercial
339-392-12	305 S MELROSE ST	0.11	OT	OT	35		4		4	Existing-Use- Commercial
339-392-04	338 W SANTA FE AVE	0.06	OT	OT	35		2		2	Residential, Multi-family
339-392-06	334 W SANTA FE AVE	0.06	OT	OT	35		1		1	Residential, Single Family Home
339-392-07	330 W SANTA FE AVE	0.06	OT	OT	35		2		2	Existing-Use- Commercial
339-392-09	322 W SANTA FE AVE	0.11	OT	OT	35		4		4	Existing-Use- Commercial
339-392-08	326 W SANTA FE AVE	0.06	OT	OT	35		2		2	Existing-Use- Commercial
339-392-03	340 W SANTA FE AVE	0.06	OT	OT	35		1		1	Residential, Single Family Home
339-392-05	336 W SANTA FE AVE	0.06	OT	OT	35		1		1	Residential, Single Family Home
339-392-10	314 W SANTA FE AVE	0.04	OT	OT	35		1		1	Existing-Use, Residential
339-392-11	310 W SANTA FE AVE	0.07	OT	OT	35		2		2	Existing-Use, Residential
339-363-09	232 S WALNUT AVE	0.15	OT	OT	35		4		4	Residential, Single Family Home
339-363-10	349 W SANTA FE AVE	0.15	OT	OT	35		5		5	Residential, Multi-family
339-363-19	301 W SANTA FE AVE	0.06	OT	OT	35		2		2	Existing-Use- Commercial
339-363-11	341 W SANTA FE AVE	0.17	OT	OT	35		5		5	Residential, Single Family Home
339-363-29	325 W SANTA FE AVE	0.11	OT	OT	35		3		3	Residential, Single Family Home
339-363-16	317 W SANTA FE AVE	0.06	OT	OT	35		1		1	Residential, Single Family Home
339-363-17	315 W SANTA FE AVE	0.06	OT	OT	35		1		1	Residential, Single Family Home
339-363-18	307 W SANTA FE AVE	0.11	OT	OT	35		4		4	Residential, Multi-family
339-391-16	400 BAKER ST	1.64	OT	OT	65	104			104	Residential, Apartment
339-391-16	400 BAKER ST	0.16	OT	OT	65		10		10	Residential, Apartment
339-391-06	321 S WALNUT AVE	0.14	OT	OT	65		8		8	Residential, Multi-family
339-391-01	412 W SANTA FE AVE	0.13	OT	OT	35		3		3	Residential, Single Family Home
339-391-02	307 S WALNUT AVE	0.13	OT	OT	35		3		3	Residential, Single Family Home
339-391-03	311 S WALNUT AVE	0.13	OT	OT	35		4		4	Residential, Multi-family
339-391-04	315 S WALNUT AVE	0.13	OT	OT	65		7		7	Residential, Single Family Home
339-391-05	319 S WALNUT AVE	0.14	OT	OT	65		8		8	Residential, Single Family Home
346-331-07	1952 E. Veterans Way	0.78	HDR	R-3	25		19		19	industrial
346-164-24	513 S. Van Buren St.	0.17	HDR	R-3	25		3		3	house
<b>TOTALS</b>						<b>1,255</b>	<b>644</b>	<b>0</b>	<b>1,896</b>	

## Appendix B: Residential Land Inventory

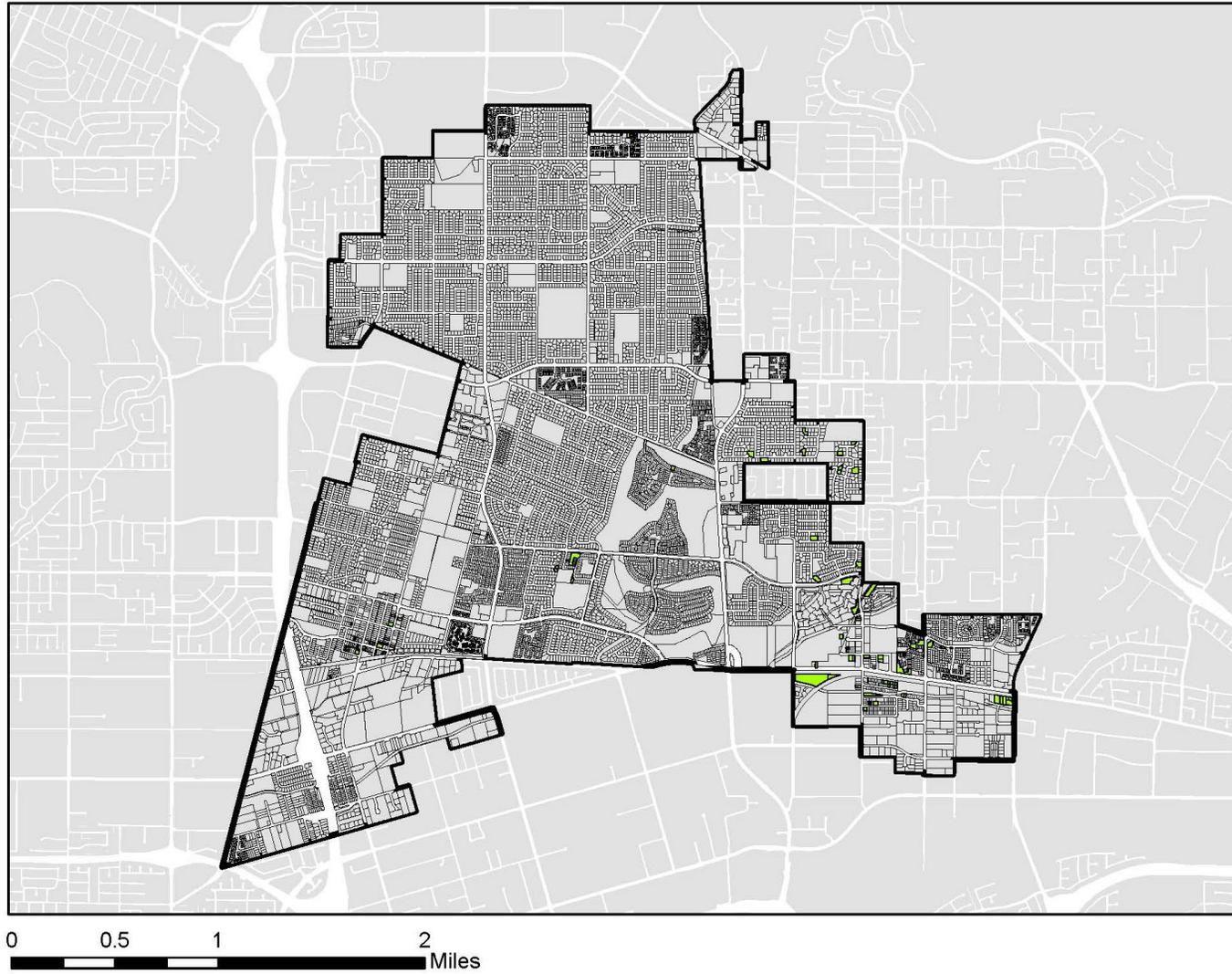


**Table B-5: Candidate Sites for Rezoning**

APN	Street Address	Acres	General Plan	Zoning	Proposed GP/Zoning	Density (du/ac)	Potential Units	Existing Use
<a href="#">339-451-01</a>	<a href="#">500-511 Cameron St.</a>	<a href="#">0.89</a>	<a href="#">Industrial</a>	<a href="#">M (PMD)</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">73</a>	<a href="#">511 Cameron-Elljay Acoustics; 500 Cameron-Giroux Glass</a>
<a href="#">339-451-14</a>	<a href="#">510 Cameron St.</a>	<a href="#">0.29</a>	<a href="#">Industrial</a>	<a href="#">M (PMD)</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">24</a>	<a href="#">Vacant building</a>
<a href="#">339-451-06</a>	<a href="#">516 Cameron St.</a>	<a href="#">0.34</a>	<a href="#">Industrial</a>	<a href="#">M (PMD)</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">28</a>	<a href="#">Vacant building</a>
<a href="#">339-451-05</a>	<a href="#">530 Cameron St.</a>	<a href="#">0.49</a>	<a href="#">Industrial</a>	<a href="#">M (PMD)</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">40</a>	<a href="#">Vacant building</a>
<a href="#">339-451-03</a>	<a href="#">531 Cameron St.</a>	<a href="#">0.58</a>	<a href="#">Industrial</a>	<a href="#">M (PMD)</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">48</a>	<a href="#">SMC (Sun Meat Company)</a>
<a href="#">339-451-02</a>	<a href="#">521 Cameron St.</a>	<a href="#">0.37</a>	<a href="#">Industrial</a>	<a href="#">M (PMD)</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">30</a>	<a href="#">Contractor's Office (JEC Electric)</a>
<a href="#">339-101-13</a>	<a href="#">515 S. Melrose St.</a>	<a href="#">1.54</a>	<a href="#">Industrial</a>	<a href="#">M</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">126</a>	<a href="#">Vanderveer Industrial Plastics</a>
<a href="#">339-101-12</a>	<a href="#">505 S. Melrose St.</a>	<a href="#">1.12</a>	<a href="#">Industrial</a>	<a href="#">M</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">92</a>	<a href="#">Coast Southwest</a>
<a href="#">339-101-11</a>	<a href="#">330 W. Crowther Ave.</a>	<a href="#">0.59</a>	<a href="#">Industrial</a>	<a href="#">M</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">48</a>	<a href="#">Silky Socks</a>
<a href="#">339-101-14</a>	<a href="#">420 W. Crowther Ave.</a>	<a href="#">1.55</a>	<a href="#">Industrial</a>	<a href="#">M</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">127</a>	<a href="#">Coast Southwest</a>
<a href="#">339-101-10</a>	<a href="#">440 W. Crowther Ave.</a>	<a href="#">0.53</a>	<a href="#">Industrial</a>	<a href="#">M</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">43</a>	<a href="#">Contractor's Business (HVAC Medical Inc)</a>
<a href="#">339-101-07</a>	<a href="#">480 W. Crowther Ave.</a>	<a href="#">3.34</a>	<a href="#">Industrial</a>	<a href="#">M</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">274</a>	<a href="#">Self Storage container business (Extra Space Storage)</a>
<a href="#">339-101-06</a>	<a href="#">550 W. Crowther Ave</a>	<a href="#">2.87</a>	<a href="#">Industrial</a>	<a href="#">M</a>	<a href="#">TOD</a>	<a href="#">95</a>	<a href="#">235</a>	<a href="#">Warehouse/Office business (West Coast Metal Stamping)</a>
<b>Subtotals</b>		<b>14.5</b>					<b>1,189</b>	
<a href="#">346-162-01</a>	<a href="#">Orangethorpe/Jefferson</a>	<a href="#">0.47</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">13</a>	<a href="#">Vacant land</a>
<a href="#">346-162-02</a>	<a href="#">Orangethorpe/Jefferson</a>	<a href="#">4.55</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">123</a>	<a href="#">Vacant land</a>
<a href="#">346-164-23</a>	<a href="#">503 S. Van Buren St.</a>	<a href="#">0.21</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">6</a>	<a href="#">Vacant land</a>
<a href="#">346-331-02</a>	<a href="#">601 S. Lakeview Ave.</a>	<a href="#">4.55</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">123</a>	<a href="#">Vacant land</a>
<a href="#">346-331-03</a>	<a href="#">Lakeview Loop/Veterans Wy</a>	<a href="#">0.13</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">3</a>	<a href="#">Vacant land</a>
<a href="#">346-331-11</a>	<a href="#">625 S. Lakeview Ave.</a>	<a href="#">0.53</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">14</a>	<a href="#">Vacant land</a>
<a href="#">346-331-27</a>	<a href="#">2006 E. Lakeview Loop</a>	<a href="#">0.38</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">10</a>	<a href="#">Vacant land</a>
<a href="#">346-331-29</a>	<a href="#">2018 E. Lakeview Loop</a>	<a href="#">0.39</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">11</a>	<a href="#">Vacant land</a>
<a href="#">346-331-30</a>	<a href="#">613 S. Lakeview Ave.</a>	<a href="#">0.45</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">12</a>	<a href="#">Vacant land</a>
<a href="#">346-331-32</a>	<a href="#">1958 E. Veterans Way</a>	<a href="#">0.81</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">22</a>	<a href="#">Vacant land</a>
<a href="#">346-331-07</a>	<a href="#">1952 E. Veterans Way</a>	<a href="#">0.78</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">21</a>	<a href="#">Industrial</a>
<a href="#">346-164-24</a>	<a href="#">513 S. Van Buren St.</a>	<a href="#">0.17</a>	<a href="#">HDR</a>	<a href="#">R-3</a>	<a href="#">HDR/R3</a>	<a href="#">30</a>	<a href="#">5</a>	<a href="#">SFR</a>
<b>Subtotals</b>		<b>13.4</b>					<b>363</b>	
<b>Totals</b>		<b>27.9</b>					<b>1,552</b>	

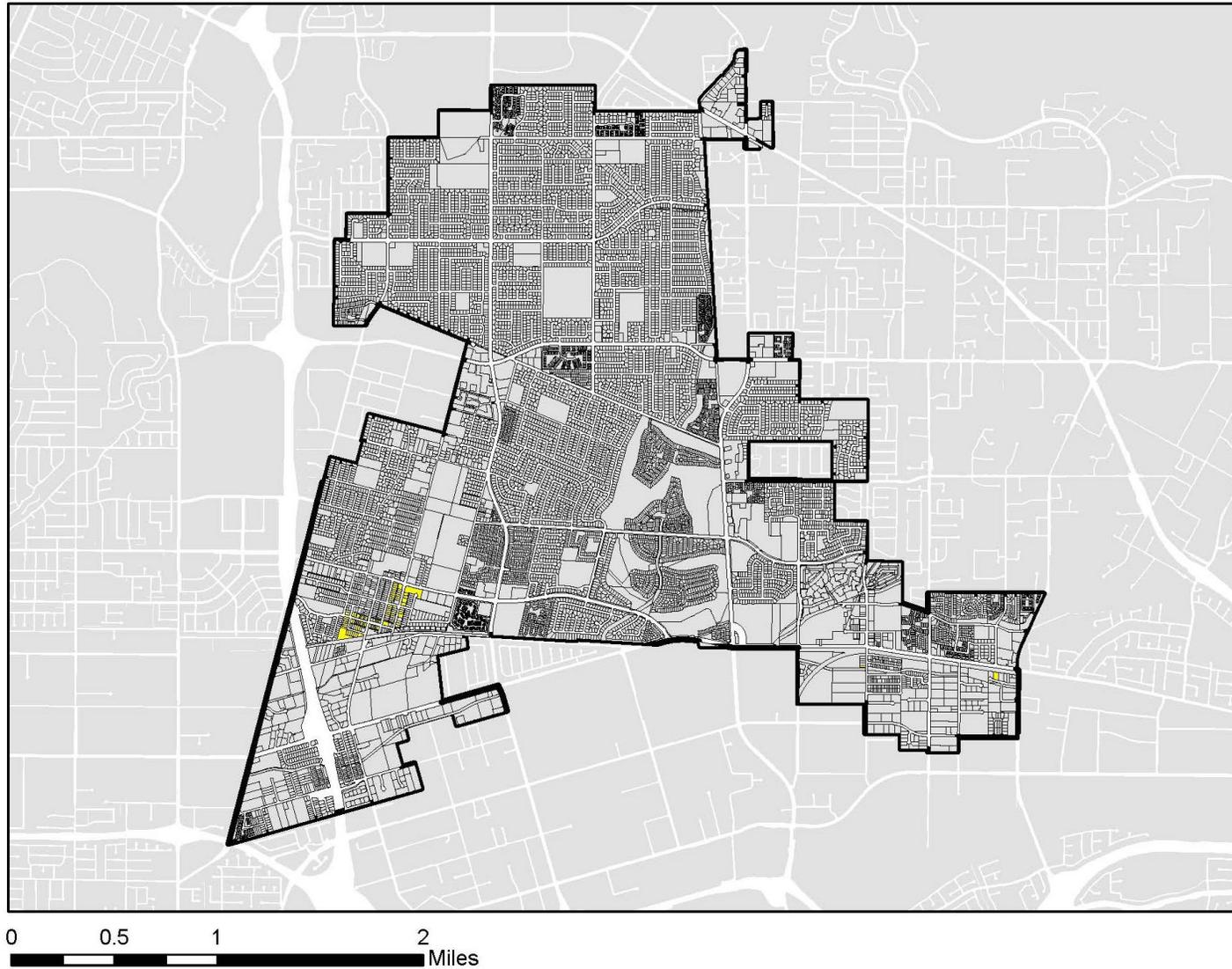


Figure B-2: Vacant Sites



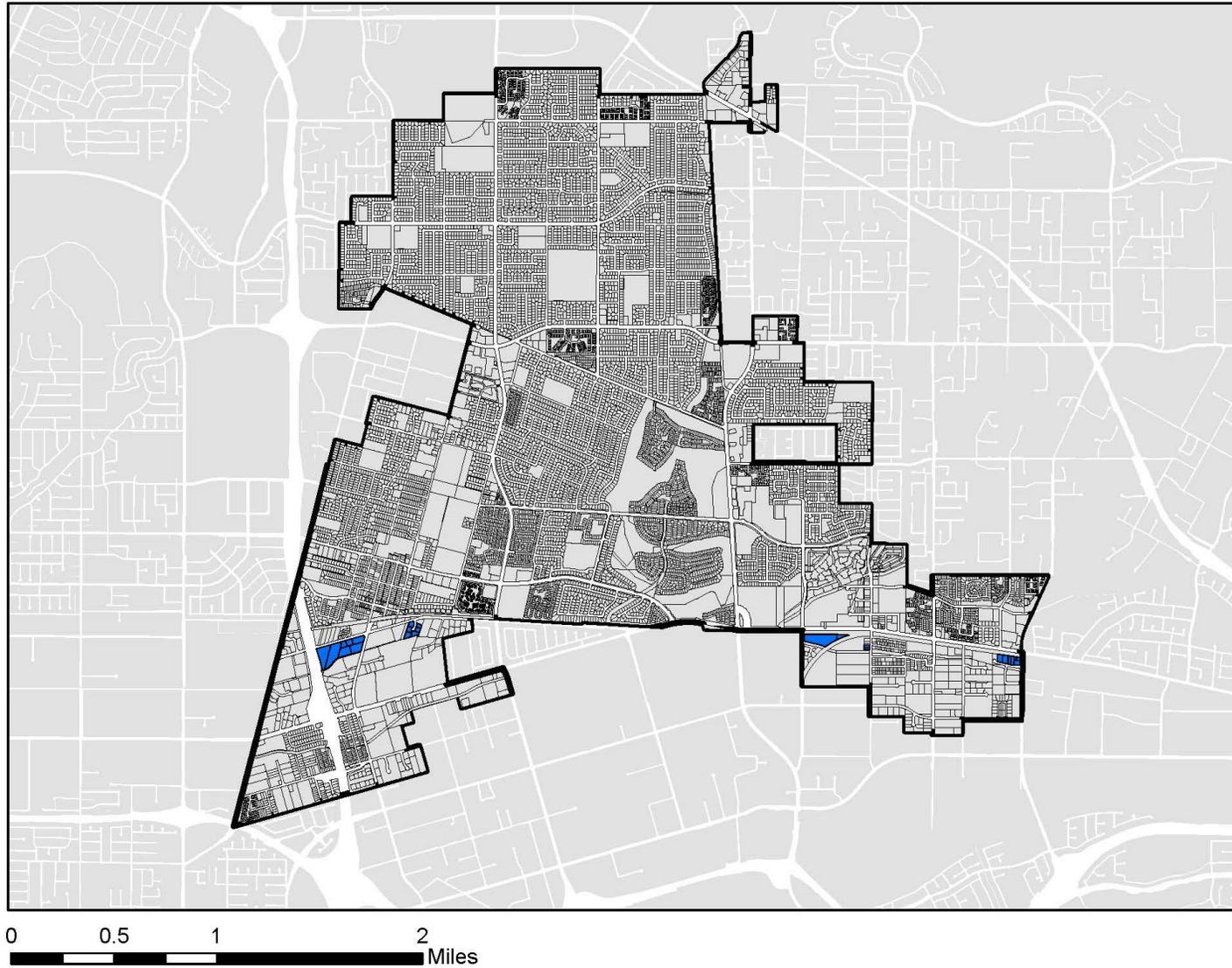


**Figure B-3: Underutilized Sites**





**Figure B-4: Candidate Sites for Rezoning**





## Appendix C: Review of Housing Element Performance

Section 65588(a) of the *Government Code* requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This appendix contains a review the housing goals, policies, and programs of the previous housing element, and evaluates the degree to which these programs have been implemented during the previous planning period, 2013 through 2021. The findings from this evaluation have been instrumental in determining the City’s 2021 Housing Implementation Program.

Table C-1 summarizes the programs contained in the previous Housing Element along with the City’s progress in implementation.

Table C-2 presents the City’s progress in meeting the quantified objectives from the previous Housing Element.

During the prior planning period the City has been very successful in addressing the housing needs of special needs populations.

In early 2019 the North Orange County Service Planning Area for Homelessness Outreach Efforts reached an important milestone. A regional partnership of 13 cities located in northern Orange County (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park and Yorba Linda) came together to share intelligence and resources to address regional homelessness. Their concept was to promote greater regional coordination on homeless issues while reducing the span of control regarding working with the County of Orange and others.

After months of extensive discussions, negotiations and assessments, two locations within the North Orange County Service Planning Area were identified for the development of “navigation centers” based on a number of factors including zoning, proximity to related services and site availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to a shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in the city of Anaheim that accommodated 325 new beds.

Funding for the Navigation Centers was secured through application and governmental meetings with state, regional, county and local officials resulting in the \$12 million in State of California Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of these Navigation Centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing operation of the Navigation Centers. A Memorandum of Understanding was prepared and presented to the City Councils of all thirteen city governments for execution in May 2019. Construction began in 2019 and the opening of the first 100-bed Navigation Center in Placentia

## Appendix C: Review of Housing Element Performance

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occurred on March 31, 2020. This groundbreaking success story was born of the regional need and public official desire to come together to address homelessness and pioneer the way to create and operate a multi-jurisdictional homelessness facility. Programs 1.4, 1.14 and 2.3 identify actions the City is taking to address homelessness.

In addition to the Placentia Navigation Center, the City successfully facilitated development of a 189-unit 100% low-income deed-restricted housing development (USA Properties, Figure B-1). The project is currently under construction adjacent to the Placentia Metrolink Station.

## Appendix C: Review of Housing Element Performance



**Table C-1: 2013-2021 Program Evaluation**

Name of Program	Objective	Timeframe	Status of Program Implementation
HE-1.1: Manufactured Housing and Mobile Homes	Use of Manufactured Housing	Zoning Code amendment by June 2014	Ongoing.
HE-1.2: Locate Housing Near Transportation, Employment and Services	Encourage new housing in proximity to transportation, employment and services	Ongoing	Ongoing. This remains a high priority of the City as the construction of the Placentia Metrolink Station is scheduled to start late 2019. The City Council approved and adopted the Transit Oriented Development (TOD) Packing House District near the future Metrolink Station on April 18, 2017 which allows densities up to 95 du/acre. To date, 633 units have been entitled in the TOD District. On July 18, 2017, the Old Town Zoning District was adopted (Ordinance No. O-2017-05) by City Council and the Development Standards include a sub-area allowing high density housing by right without a public hearing, at a density up to 65 dwelling units per acre. Both the TOD and Old Town Zoning Districts are immediately adjacent to the Placentia Metrolink Station.
HE-1.3: Pursue County, State and Federal Funds	Increase use of County, State and Federal funds	Monitor funding opportunities on an annual basis and apply for funding as opportunities arise	Ongoing. The City is continually reviewing grant funding opportunities for housing developments and is actively pursuing County and State funds, including transportation circulation grants provided by the State Department of Transportation and SCAG. In partnership with SCAG, the City Council recently approved formation of an EIFD in the Old Town Zoning District that will result in \$8.2 million in funding for infrastructure related to transit oriented development. The City successfully applied for and received SB2 and LEAP Grant funding.
HE-1.4: Emergency Shelters and Transitional and Supportive Housing	Continue to encourage the provision of emergency shelters, transitional and supportive housing	Ongoing	PMC Ch. 23.47 amended to permit emergency shelters in the M Zone. The City of Placentia purchased a property at 731 S. Melrose Street, Placentia, and constructed a 100-bed homeless shelter, which opened in March 2020.
HE-1.5: Infrastructure Program	Reduce constraints associated with infrastructure	Annual review, revisions as appropriate	Ongoing. The City annually reviews development costs and opportunities for removing constraints due to the high cost of infrastructure improvements. The City is near built-out with infrastructure mostly in place. Infrastructure near proposed Metrolink Station is a strong candidate for competitive grant funding. The City is continually reviewing grant funding opportunities for housing developments and is actively pursuing County and State funds, including transportation circulation grants provided by the State Department of Transportation and SCAG. In partnership with

## Appendix C: Review of Housing Element Performance



Name of Program	Objective	Timeframe	Status of Program Implementation
			SCAG, the City Council recently approved formation of an EIFD in the Old Town Zoning District that will result in \$8.2 million in funding for infrastructure related to transit-oriented development.
HE-1.6: Development Processing System Review	Minimize development review/processing time	Ongoing, Annual Review	Completed/Ongoing. The City annually reviews its development processing procedures and has adopted several streamlined procedures in the last three years. Ordinance No. O-2017-05 adopted by City Council in July 2017 codifies Old Town Development Standards including a sub-area allowing high density housing by right without a public hearing, reducing development processing timeframes, allowing housing at a density up to 65 dwelling units per acre.
HE-1.7: Vacant and Underutilized Land Inventory	Inventory of vacant and underutilized land	Annual update of inventory	Ongoing. The City provides the inventory of vacant and underutilized land upon request by developers, including affordable housing developers and routinely discusses these parcels with developers. The City has budgeted consulting services with a private economic development firm to assist with identifying up-to-date inventory of vacant and underutilized land. The City is in the process of selling these vacant lands to qualified developers. The City keeps a list of vacant and under-utilized sites that are owned by the City and/or City-related agency.
HE-1.8: Adequate Sites for Housing Development	Rezone a minimum of 8 acres to permit residential development at a density of 30 du/ac (or an amount of land needed to accommodate at least 231 units at an alternate density of more than 30 units/acre).	Prior to October 2014	Completed. Ordinance No. O-2017-05 adopted by the City Council in July 2017 codifies the Old Town District Development Standards which includes a sub-area allowing high-density residential housing by right without a discretionary review nor public hearing, at a density up to 65 dwelling units per acre for an area exceeding 1.27 acres. The maximum density for this sub-area is up to 65 dwelling units/acre. In addition, TOD Zone was also adopted in 2017 at densities of 65-95 du/ac).
HE-1.9: Monitoring of Constructed Units Based on Income Level	Tracking performance by income level	Ongoing	Ongoing. Forms have been developed to gain the information at the time a building permit is issued.
HE-1.10: Encourage Development of Housing for Extremely Low-Income Households	67 ELI Units by 2021	Annual consultation with affordable housing developers, or as development opportunities arise	Completed. The completion and occupancy of 49 very low income units in 2020 (the Veteran's Village development) contributes to achieving this goal. The City is reviewing other incentive programs to implement. The City has increased its contacts with non-profit developers regarding affordable housing opportunities. The elimination of redevelopment set aside funds severely restricts this

## Appendix C: Review of Housing Element Performance



Name of Program	Objective	Timeframe	Status of Program Implementation
			effort. (John, also see attached 189 unit USA Properties staff report. Some of those units may be extremely low).
HE-1.11: Amend the Density Bonus Ordinance	Review and Revise Density Bonus Ordinance	2/1/2014	Completed. The City's density bonus ordinance was reviewed and the City will follow changes in State law relating to such bonuses. (John see PMC CH. 23.23, adopted in 2002. Not sure if it is consistent with State law).
HE-1.12: Development of Senior Housing	Senior Housing Development	Ongoing	Ongoing. The City provides incentives and density bonuses for senior housing development. On December 1, 2020, City Council approved entitlements for a 64-unit affordable senior housing development at 1314 N. Angelina Drive. (see attached staff report)
HE-1.13: Development of Housing for Larger Families	Housing Units with larger bedroom counts	Ongoing	Ongoing. The City has not implemented an incentive program. The elimination of redevelopment funds severely restricts this effort. The City is reviewing incentive programs to implement. The City has increased its contacts with non-profit developers regarding affordable housing opportunities.
HE-1.14: Housing for Persons with Special Needs	Housing Units for households with special needs	Ongoing	Completed/Ongoing. The City has not implemented an incentive program at this time, however the issuance of permits for 49 very low income units in 2018 (the Veteran's Village development) contributes to this as qualified residents must be Veterans who are homeless or at risk of homelessness and the development will provide "wrap around" services to provide vocational training, mental health services, job placement, and more. The City has also identified potential parcels for additional special needs housing.
HE-1.15: Transit-Oriented Development	Encourage Transit-Oriented Development	Ongoing	Completed and ongoing. The City Council approved and adopted the Transit Oriented Development (TOD) Packing House District near the future Metrolink Station on April 18, 2017 which allows densities up to 95 du/acre. To date, 633 units have been entitled in the TOD District. On July 18, 2017, the Old Town Zoning District was adopted (Ordinance No. O-2017-05) by City Council and the Development Standards include a sub-area allowing high density housing by right without a public hearing, at a density up to 65 dwelling units per acre. Both the TOD and Old Town Zoning Districts are immediately adjacent to the Placentia Metrolink Station and allow Transit Oriented Development. The City continues to work with developers on Transit Oriented Development opportunities connected with the forthcoming Placentia Metrolink Station. Incentives include the utilization of City owned property as well as reduced parking requirements and

## Appendix C: Review of Housing Element Performance



Name of Program	Objective	Timeframe	Status of Program Implementation
			densities up to 95 dwelling units per acre for the TOD Zone and up to 65 dwelling units per acre for the Old Town Zone, both of which surround the proposed facility.
HE-1.16: Single-Room Occupancy Units (SROs)	Facilitate development of SROs	Ongoing	Completed. On May 7, 2016 the City Council approved Ordinance No. O-2013-08 to amend Title 23 (Zoning Ordinance) of the Placentia Municipal Code Pertaining to Emergency Shelters, Supportive and Transitional Housing Facilities, Single Room Occupancies and Provisions for Reasonable Accommodations for Persons with Disabilities, including Standards and Procedures thereto. (John, see PMC CH. 23.24)
HE-1.17: Review and Revise Residential Parking Requirements	Adopt appropriate parking requirements for new TOD and mixed-use development; Review existing multi-family parking standards and revise as necessary	2014	Partially completed. The City will review and propose amendments to its city-wide residential parking requirements during the forthcoming General Plan and Zoning Code updates. The City has already adopted significantly reduced parking requirements for the newly adopted Transit Oriented Development (TOD) Zone and Old Town District Zone, both of which were adopted in 2017.
HE-1.18: Encourage and Facilitate Lot Consolidation	Encourage and Facilitate Lot Consolidation	Zone Code amendment in 2014	Completed and Ongoing. The City will address potential regulatory incentives through the General Plan, Zoning Code, and newly adopted Transit Oriented Development (TOD) Zone and Old Town Zone, both of which were adopted in 2017 and both of which encourage lot consolidation. To date, 633 units have been entitled in the TOD District. One development consists of two lots being consolidated to accommodate the new TOD development and the other consists of seven lots consolidated to accommodate the new TOD development.
HE-2.1: Support of Regional Fair Housing Efforts	Fair Housing Activities	Ongoing	Ongoing. The City continues to support the Fair Housing Council of Orange County and to refer members of our community to the Council for counseling, mediation and low-cost advocacy for housing related needs.
HE-2.2: Section 8 Rental Assistance	Provide information regarding housing assistance	Ongoing	Ongoing. The City continues to partner with the Orange County Housing Authority to receive vouchers for Placentia residents.
HE-2.3: Reasonable Accommodation Procedures	Provide reasonable accommodation in housing regulations for persons with disabilities	Ongoing	On May 7, 2016 the City Council approved Ordinance No. O-2013-08 to amend Title 23 (Zoning Ordinance) of the Placentia Municipal Code Pertaining to Emergency Shelters, Supportive and Transitional Housing Facilities, Single Room Occupancies and Provisions for Reasonable Accommodations for Persons with Disabilities, including Standards and Procedures Therefore.

## Appendix C: Review of Housing Element Performance



Name of Program	Objective	Timeframe	Status of Program Implementation
HE-2.4: Comprehensive Housing Resource Directory	Housing Resource Directory	Ongoing	The City does not have the resources to develop its own directory but works with the Orange County Community Resources Department to provide information and direct residents to their online housing resource area for information.
HE 2.5: Zoning Regulations	Revise the Municipal Code definition of family consistent with current law	March 2014	In process - not yet completed.
HE-3.1: Community Based Neighborhood Rehabilitation	Conserve and Improve existing residential neighborhoods	Ongoing	Ongoing. The City created a Neighborhood Services Division in order to foster increased neighborhood services to include the coordination of CDBG funded rehabilitation. This Office is responsible for the rehabilitation program and is working with specific neighborhoods on community-centered programs.
HE-3.2: Neighborhood Identity	Creation of Neighborhood Identity	Ongoing	Ongoing. Through the City's Neighborhood Services Division, the City continues to work with neighborhoods to foster their sense of identification.
HE-3.3: Placentia Rehabilitation Grant Program	72 units provided rehabilitation grants	Ongoing	Ongoing/Completed. The City is very successful in implementing the CDBG rehabilitation program. The City is on track to exceed the identified number of units rehabilitated.
HE-3.4: Energy Conservation and Sustainable Building Practices	Energy conservation/reduced utility costs	Continue to provide energy conservation educational materials to residents	The City has utilized federal Energy Efficiency & Conservation Block Grants to provide material and energy efficient products to residents in order to promote energy efficiency. Additionally, on December 6, 2016, the City Council adopted Ordinance No. O-2016-07 adopting the new 2016 California Building Codes, including the latest Green Building Code and the City Council has authorized incentivizing increased compliance with Title 24 through building permit fee reduction.
HE-3.5: Monitoring At-Risk Units	Encourage the preservation and extension of "at-risk" units. Prevent blight and deterioration in neighborhoods	Ongoing coordination with the County and nonprofits	Ongoing. The City continues to work with the County of Orange Community Resources department to target at-risk projects and seek assistance from the County and non-profit housing groups to continue monitoring and implementing a strategy to preserve such units. Separately, the City is currently partnering with a non-profit to possibly apply for a Federal grant.
HE-3.6: Vacant Building Ordinance	Prevent blight and deterioration in neighborhoods	Ongoing	Completed and ongoing. On May 7, 2013 the City Council adopted Ordinance No. O-2013-02 pertaining to the maintenance and rehabilitation of long term boarded and vacant buildings. In addition, in late 2020, the City adopted the International Property Maintenance Code, 2018 Edition (latest edition). The City continues to enforce the

## Appendix C: Review of Housing Element Performance



Name of Program	Objective	Timeframe	Status of Program Implementation
			Vacant Building Ordinance through its Code Enforcement, Planning, and Building Divisions.
HE-4.1 Partnerships with Housing Industry	Establish partnerships with non-profit and for-profit housing developers	Ongoing	Ongoing. The City began to establish, and continues to do establish, relationships with non-profit and for-profit housing partners. The City issued building permits for 49 very low income units in 2018 (the Veteran's Village development) and qualified residents must be Veterans who are homeless or at risk of homelessness and the development will provide "wrap around" services to provide vocational training, mental health services, job placement, and more. The City has also identified potential parcels for additional special needs housing.
HE-4.2: Participation in Continuum of Care Forum	Continue participating in the County of Orange Continuum of Care Forum	Ongoing	The City continues to participate with the County of Orange Continuum of Care Forum and has actively responded to the needs of the County in providing letters of support and other requested material in support of funding applications to the Federal government.



**Table C-2 – Progress in Achieving Housing Element Quantified Objectives, 2013-2021**

Program	Quantified Objective	Level of Achievement
<b>New Construction</b>		
Extremely Low	67	49
Very Low	66	
Low	98	-
Moderate	90	40
Above-moderate	209	343
<b>TOTAL</b>	<b>530</b>	<b>432</b>
<b>Rehabilitation</b>		
Acquisition/Rehabilitation		-
Extremely Low	2	-
Very Low	2	-
Low	2	-
<b>TOTAL</b>	<b>6</b>	-
Placentia Rehabilitation Grant Program		-
Very Low/Low	30	-
<b>Preservation/Conservation</b>		
At-Risk Units	Imperial Villas- 58 Moderate	58





## Appendix D: Affirmatively Furthering Fair Housing

Assembly Bill (AB) 686 requires housing elements to contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

Under California law, AFFH 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.”

To comply with AB 686, the City has completed the following outreach and analysis.

### 1. Outreach

As discussed in the Public Participation appendix, early in the Housing Element update process the City developed a list of stakeholders with local expertise in housing issues, including fair housing. The stakeholder list included local service providers, affordable housing developers, and fair housing organizations in an effort to include the interests of lower-income residents and persons with special needs in the community.

Over the course of the Housing Element update process the City conducted a series of public meetings. Public notice of each meeting was posted on the City’s dedicated Housing Element website and was also sent directly to persons and organizations on the stakeholder list. Public meetings were held both online and in person to encourage those with mobility difficulties to participate. Agendas and other information for each meeting was posted on the City website to allow interested stakeholders to access to this information throughout the process. Interested persons were also encouraged to provide input or ask questions via telephone or email. Please refer to Appendix A for additional information regarding the outreach efforts and how public input was incorporated into the Housing Element. Information was made available in both English and Spanish.

In addition to public workshops and hearings, the City also directly contacted housing advocates, housing service providers, and community organizations who serve the interests of lower-income households and special needs groups to solicit comments on housing needs, barriers to fair and affordable housing, and opportunities for development.

To encourage continuing stakeholder involvement in local housing issues throughout the planning period, Program 2.1 includes a commitment to conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

### 2. Fair Housing Assessment

This section provides an assessment of fair housing issues in Placentia including fair housing enforcement and outreach capacity, patterns of integration and segregation, racial or ethnic patterns of



concentration, disparities in access to opportunities, and disproportionate housing needs, including displacement risk.

### **A. Fair Housing Enforcement and Outreach Capacity**

The primary fair housing organization serving Placentia is the Fair Housing Council of Orange County (<https://www.fairhousingoc.org/>). The FHCOC was formed in 1965 in the wake of the civil rights movement that resulted in the Civil Rights Act of 1964. The Council incorporated in 1968, the same year that Congress extended civil rights protections to cover housing with the adoption of the Fair Housing Act. Under the direction of a volunteer board of directors and staff, the agency works to fulfill a mission of protecting the quality of life in Orange County by ensuring equal access to housing opportunities, fostering diversity and preserving dignity and human rights. An operating member of the National Fair Housing Alliance, the FHCOC works to eliminate housing discrimination and guarantee the rights of all people to freely choose the housing for which they qualify in the area they desire. Services provided by the Fair Housing Council include fair housing enforcement and education, landlord/tenant counseling, mediation and homebuyer HUD counseling, which includes first-time homebuyer education and mortgage default counseling. Services are available to low-to-moderate income clients free of charge and to others for a moderate donation. Services are available in English, Spanish, and Vietnamese.

### **Orange County**

The County of Orange acts as lead agency for the “Urban County,” which includes 21 non-entitlement cities. Placentia is a participating city in the Urban County Program. The most recent Orange County Analysis of Impediments to Fair Housing Choice (the “AI”) was adopted in June 2020 and includes a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards the County’s obligation to affirmatively furthering fair housing. The Lawyers’ Committee for Civil Rights Under Law (Lawyers’ Committee), in consultation with Orange County jurisdictions and with input from a wide range of stakeholders through a community participation process, prepared the AI. To provide a foundation for the conclusions and recommendations presented in this AI, the following information was reviewed and analyzed:

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

As required by federal regulations, the AI draws from the sources listed above to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs. The analysis also examines publicly supported housing in the County as well as fair housing issues for persons with disabilities. Private and public fair



housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

To ensure that the analysis contained in the AI truly reflects conditions in the community and that the goals and strategies are targeted and feasible, the participation of a wide range of stakeholders is of critical importance. A broad array of outreach was conducted through community meetings, focus groups, and public hearings.

In preparing this AI, the Lawyers' Committee reached out to tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal services providers, social services providers, housing developers, and industry groups to hear directly about fair housing issues affecting residents of Orange County.

Beginning in October 2019, the Lawyers' Committee held meetings with individual stakeholders throughout the County. In January and February 2020, evening community meetings were held in Mission Viejo, Westminster/Garden Grove, Santa Ana, and Fullerton (which is immediately adjacent to Placentia). Also in February, the Lawyers' Committee held a focus group with a wide array of nonprofit organizations and government officials.

Geographically specific community meetings were held across Orange County, including the South, West, Central, and North parts of the County. Additional outreach was conducted for members of protected classes, including the Latino and Vietnamese communities. All community meetings had translation services available if requested in Spanish and Vietnamese. In addition, all meetings were held in locations accessible to people with mobility issues. The Executive Summary of the AI was translated into Spanish and Vietnamese. Public hearings and City Council meetings were held throughout the County.

The County AI describes the departments and organizations that handle fair housing enforcement and outreach in Orange County. The California Department of Fair Employment and Housing (DFEH) investigates complaints of employment and housing discrimination. The Fair Housing Council of Orange County (FHCOC) provides services throughout the Urban County, including Placentia, to ensure equal access to housing. FHCOC's services include outreach and education, homebuyer education, mortgage default counseling, landlord-tenant mediation, and limited low-cost advocacy. The Fair Housing Council investigates claims of housing discrimination and assists with referrals to DFEH. Community Legal Aid SoCal is a legal service provider serving low-income people in Orange County and Southeast Los Angeles County.

The 2020 Orange County AI reported that:

- FHCOC regionally conducted or participated in 467 education and/or outreach activities. Regionally, over 9,550 people were served by these activities. Through its various regional outreach efforts FHCOC distributed over 82,130 pieces of literature on fair housing, its services and other housing-related topics. Additionally, throughout Orange County FHCOC held 32 training sessions for rental property owners/managers. FHCOC presented 16 fair housing seminars, 70 general fair housing workshops
- On a regional basis, FHCOC staff received 363 allegations of housing discrimination and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation



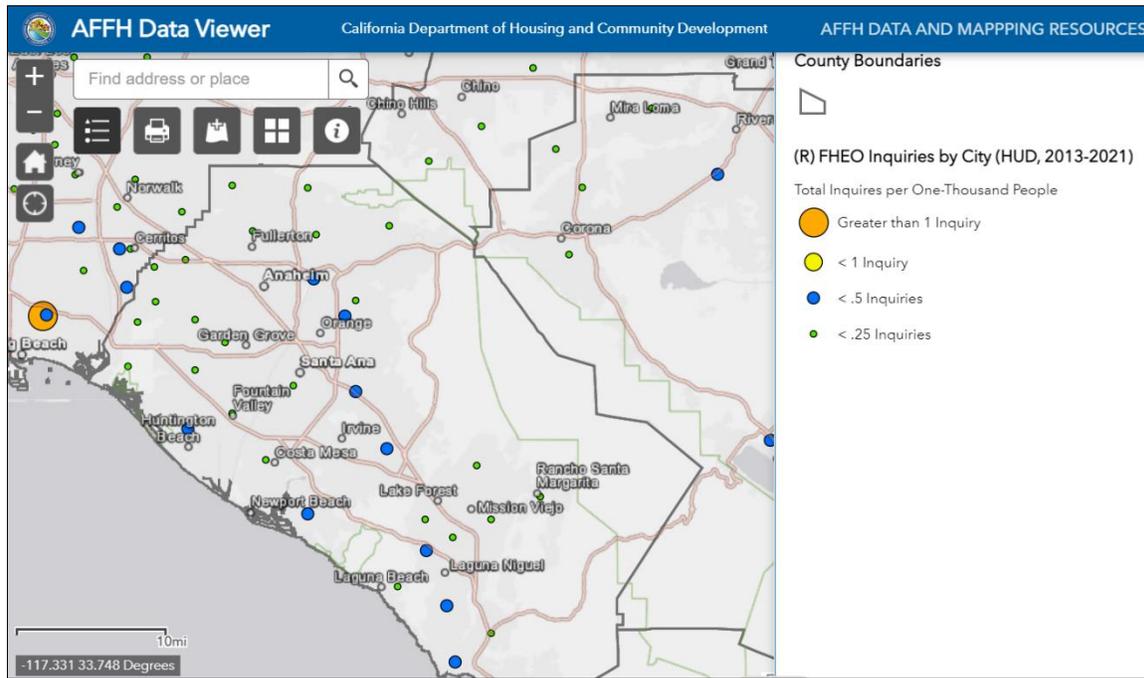
and/or action. FHCOC also conducted 362 systemic onsite tests, either paired or ‘sandwich’, 51 tests occurring in the jurisdiction and 215 other testing activities.

- On a regional basis, activities provided by FHCOC included assisting 7,664 unduplicated households addressing 24,766 issues, disputes and/or inquires.

**City of Placentia**

As seen in Figure D-1, the HCD AFFH Data Viewer reported a Fair Housing Enforcement and Outreach (FHEO) inquiry rate of less than 0.25 per 1,000 persons for the 2013-2021 period in Placentia.

**Figure D-1: FHEO Inquiries – Orange County and Placentia**



The Constraints section of this Housing Element describes ways that the City works to address potential impediments to fair housing choice. The City continues to contract with the FHCOC to implement the regional Fair Housing Plan (AI) and to offer fair housing services and tenant/landlord counseling to residents.

**B. Patterns of Integration and Segregation**

**1) Race and Ethnicity**

As seen in Figure D-2, the percentage of non-white population in Placentia is highest in the southeastern portion of the City and is similar to the adjacent areas in Anaheim and Fullerton, while the northern and northeastern areas have the lowest non-white proportion similar to the adjacent areas of Yorba Linda. In describing the County-wide racial and ethnic make-up, the County AI (p. 122) states that, “In general, White residents tend to reside towards the outer edges of the county, while Hispanic and sometimes Asian residents are found more in the center of the county.” This countywide distribution is illustrated in Figure D-3.



Figure D-2: Racial Demographics - Placentia

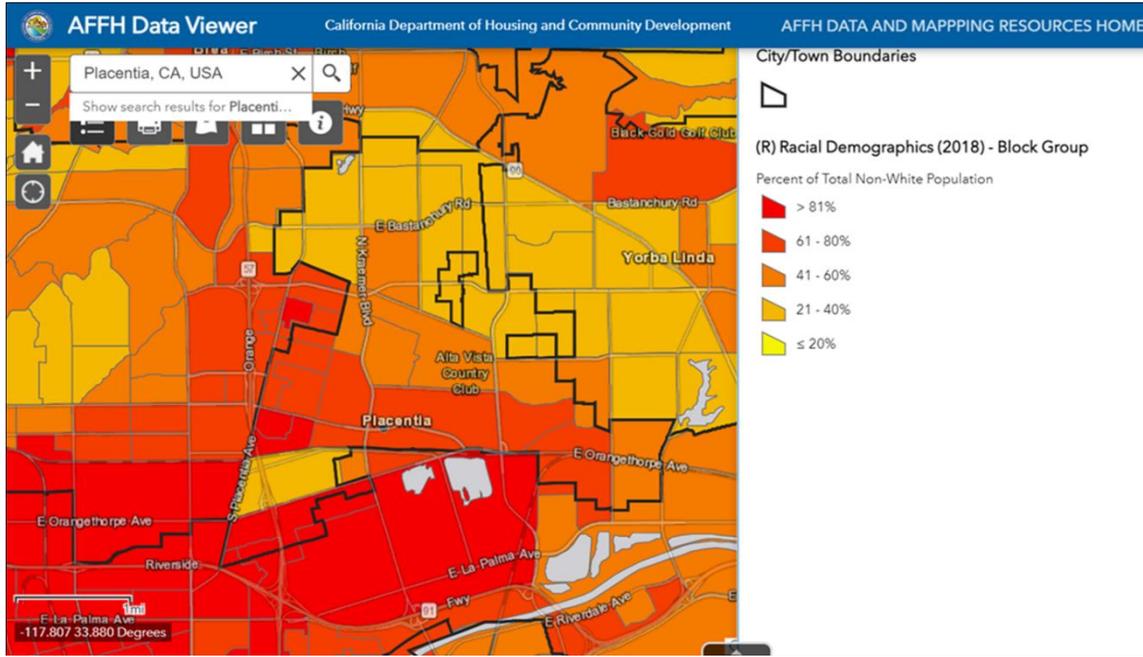
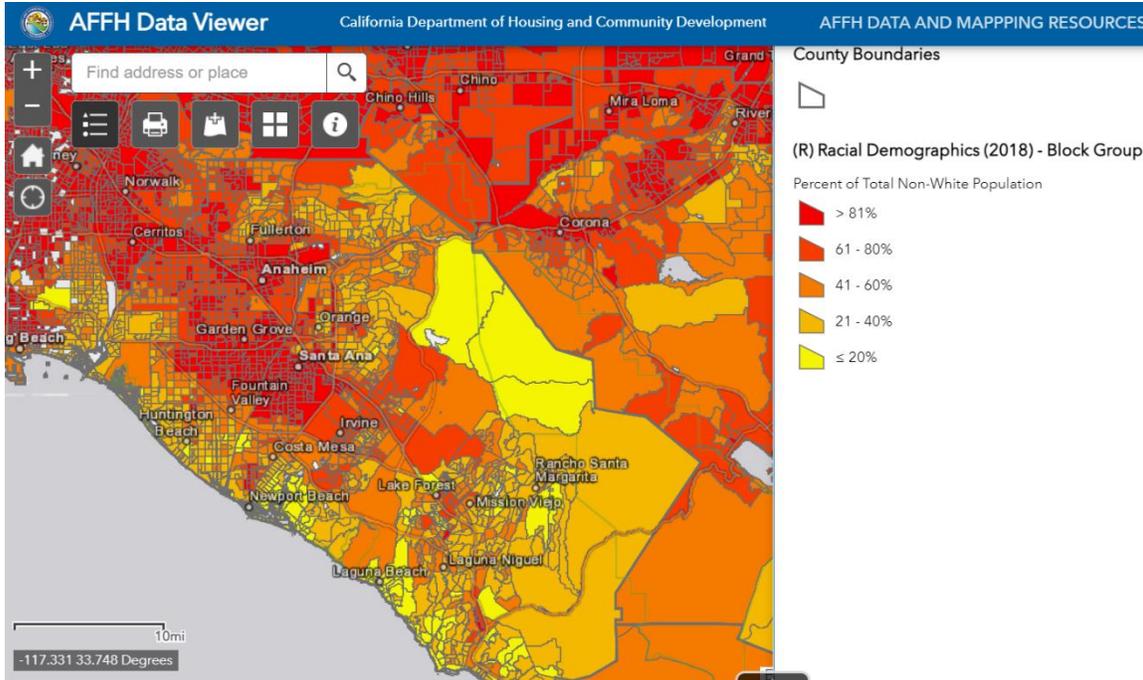


Figure D-3: Racial Demographics – Orange County



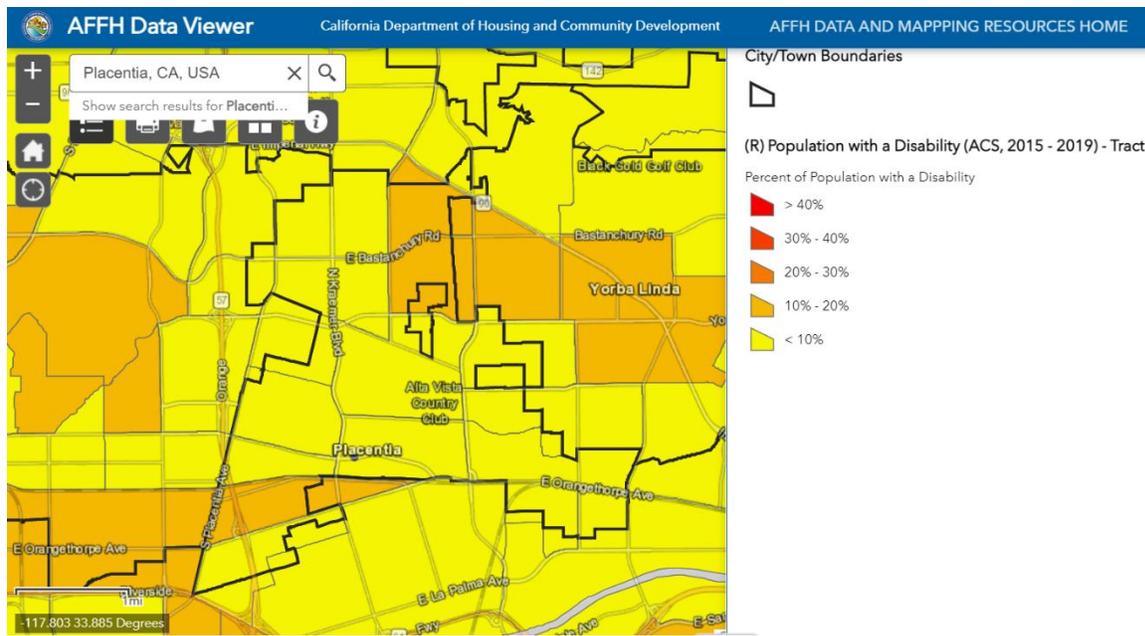


**2) Persons with Disabilities**

As shown on Figure D-4, higher percentages of disabled residents (10-20%) are located in the northeastern and southwestern portions of the city while the disability rate in other areas of the city is under 10%.

Additional data regarding the number of people with disabilities by disability type in Placentia is provided in Figure 2-20 of Chapter 2: Housing Needs Assessment. Some individuals may experience more than one disability, and some disability types are not recorded for children below a certain age. The California Department of Developmental Services (DDS) estimates that there are 392 persons with developmental disabilities within the ZIP code areas that encompass the City of Placentia.

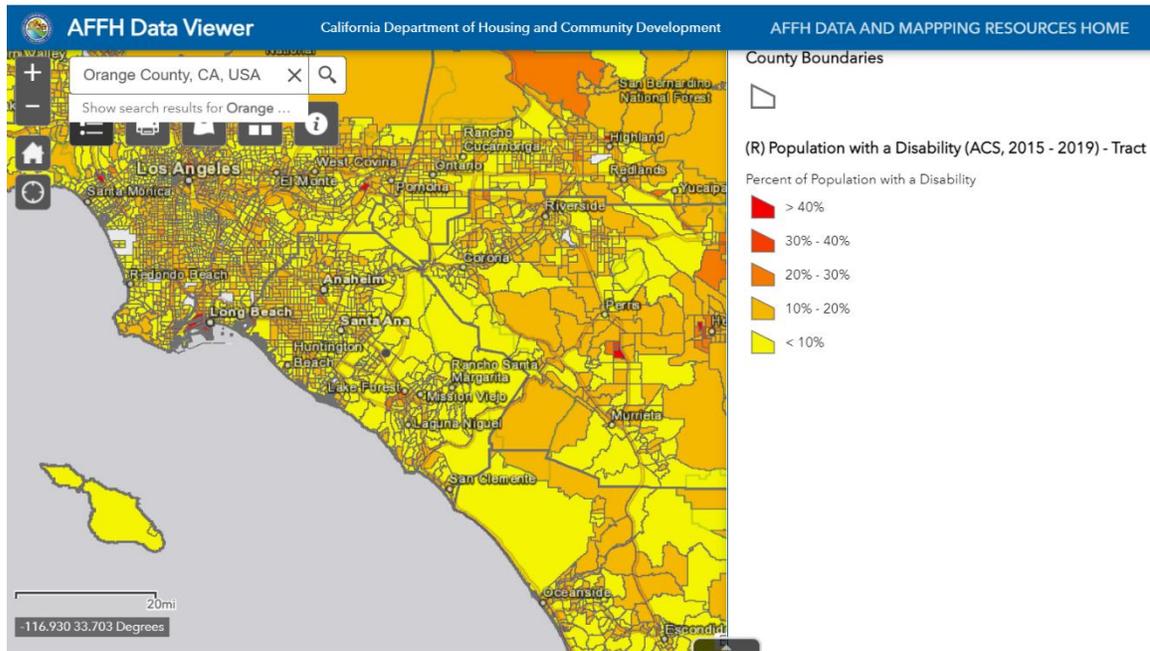
**Figure D-4: Population with a Disability – Placentia**



The Orange County AI discusses disability information countywide. According to the AI, “Communities with higher concentrations of persons with disabilities are somewhat more likely to be located in the more racially and ethnically diverse northern portion of the county than they are in the southern portion of the county” (see Figure D-5). This is reflected in the fact that six of the eight cities that have higher concentrations of persons with disabilities are in northern Orange County.



**Figure D-5: Population with a Disability – Orange County**



The housing needs of persons with disabilities vary, but generally include accessible and affordable housing, and access to supportive services. More severely disabled individuals may require a group living environment where supervision is provided, and the most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. The City of Placentia facilitates housing for persons with disabilities through its Reasonable Accommodation procedures and regulations to encourage production of supportive housing.

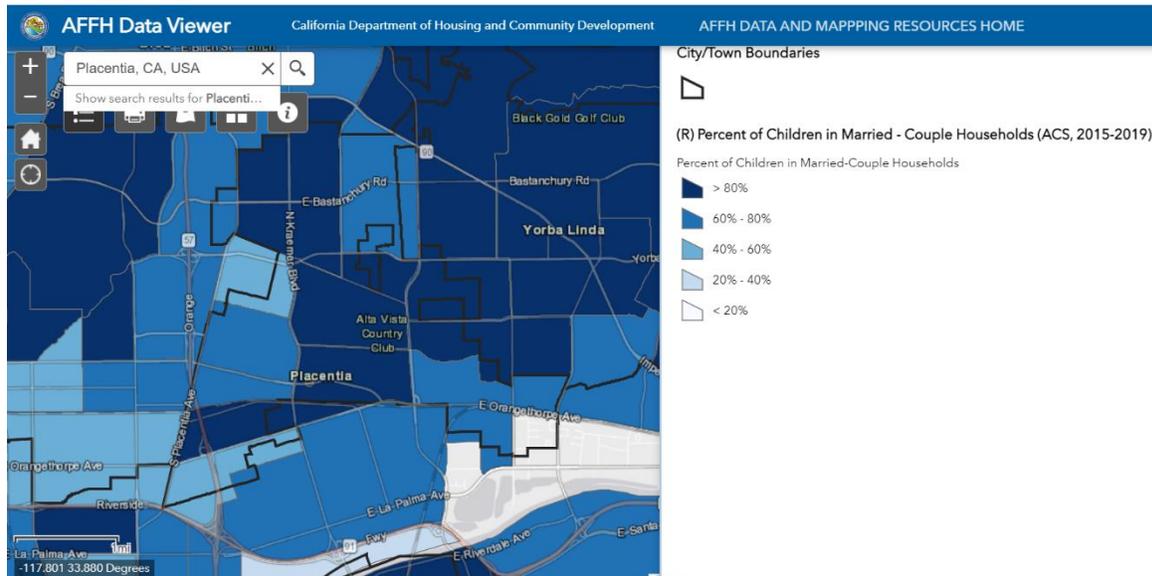
### 3) Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns.

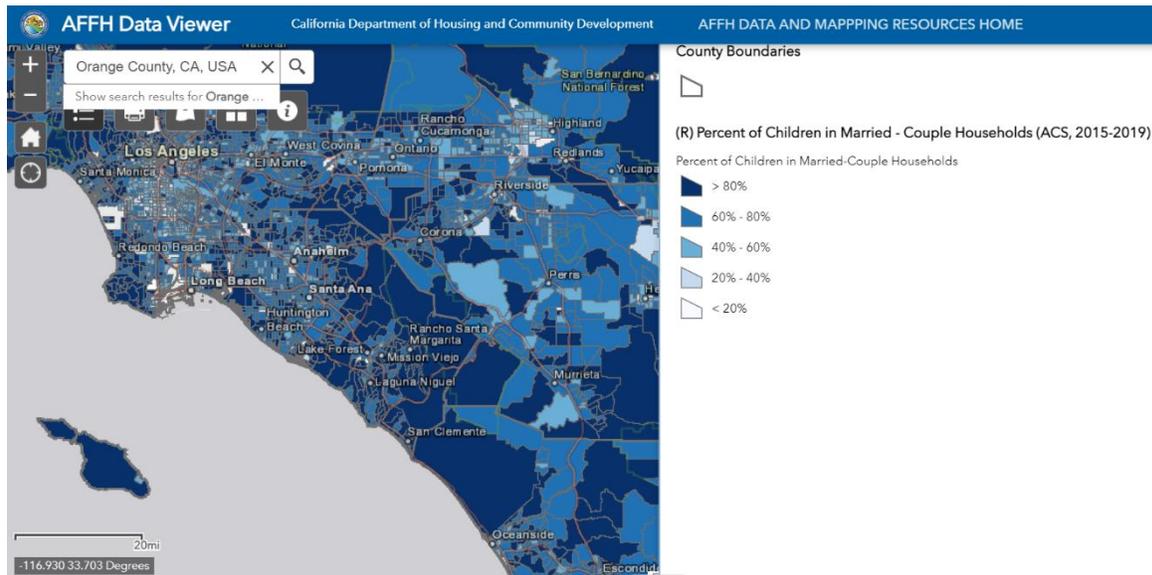
Single-parent households are also protected by fair housing law. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. As discussed in the Housing Needs Assessment, 12.6% of Placentia households are female-headed (compared to 14.3% in the SCAG region), 5.8% are female-headed and with children (compared to 6.6% in the SCAG region), and 0.4% are female-headed and with children under 6 (compared to 1.0% in the SCAG region). Figure D-6 shows the percentage of children living in married couple households in Placentia while Figure D-7 shows similar data for the county as a whole.



**Figure D-6: Percentage of Children in Married Couple Households - Placentia**



**Figure D-7: Percentage of Children in Married Couple Households – Orange County**



**4) Income**

Identifying low/moderate-income (LMI) areas is an important aspect in understanding patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). Figure D-8 shows that most of the City has fewer than 50 percent of its population within LMI groups, although some areas in the western portion of the city are above 50% LMI.



Countywide, larger LMI concentrations are located in the central portion of the county to the west and south of Placentia, in Anaheim, Santa Ana, Orange and Costa Mesa. The student population at UC Irvine has the highest percentage of poverty countywide (over 40 percent).

Figure D-8: Low/Moderate Income Population – Placentia

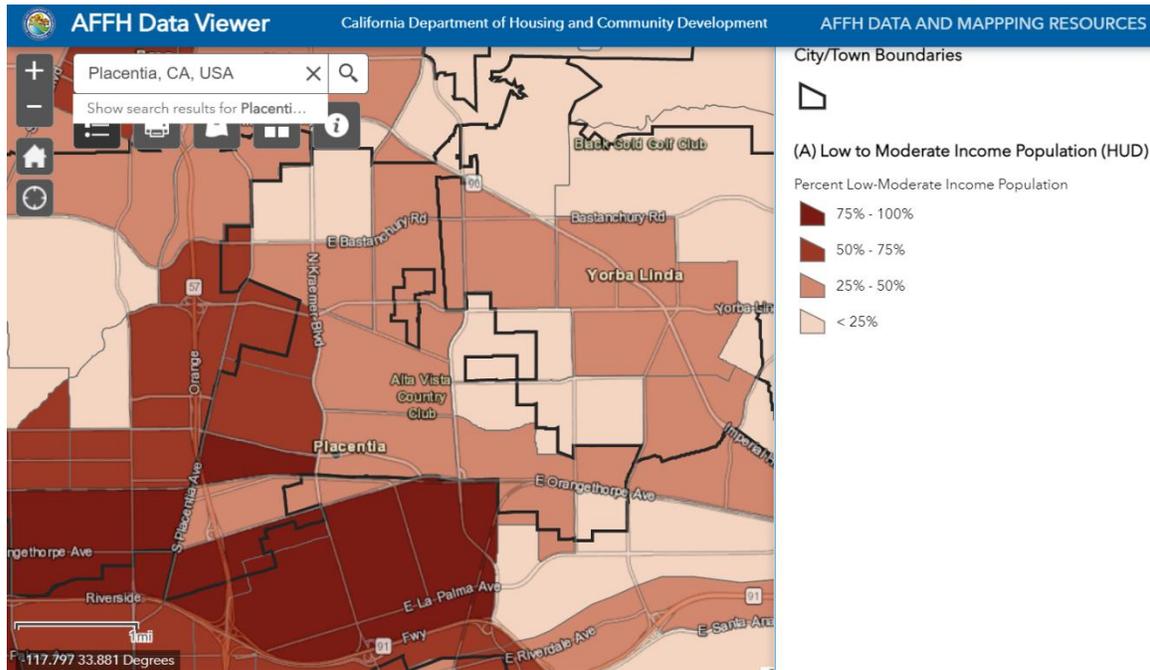
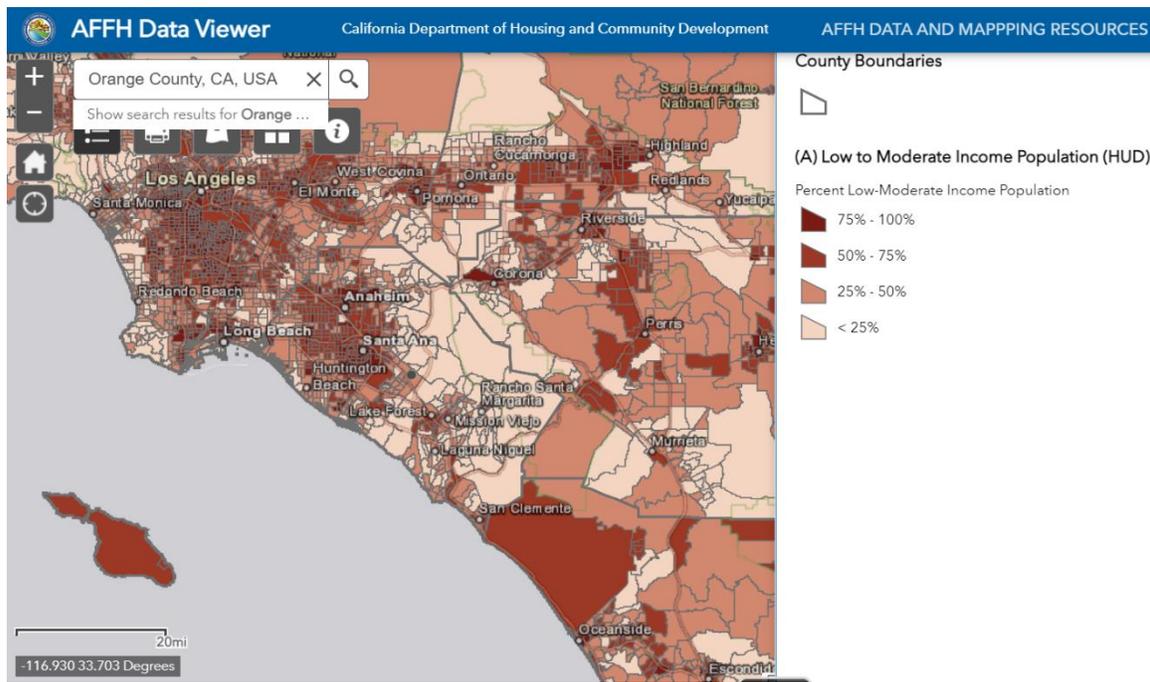


Figure D-9: Low/Moderate Income Population – Orange County



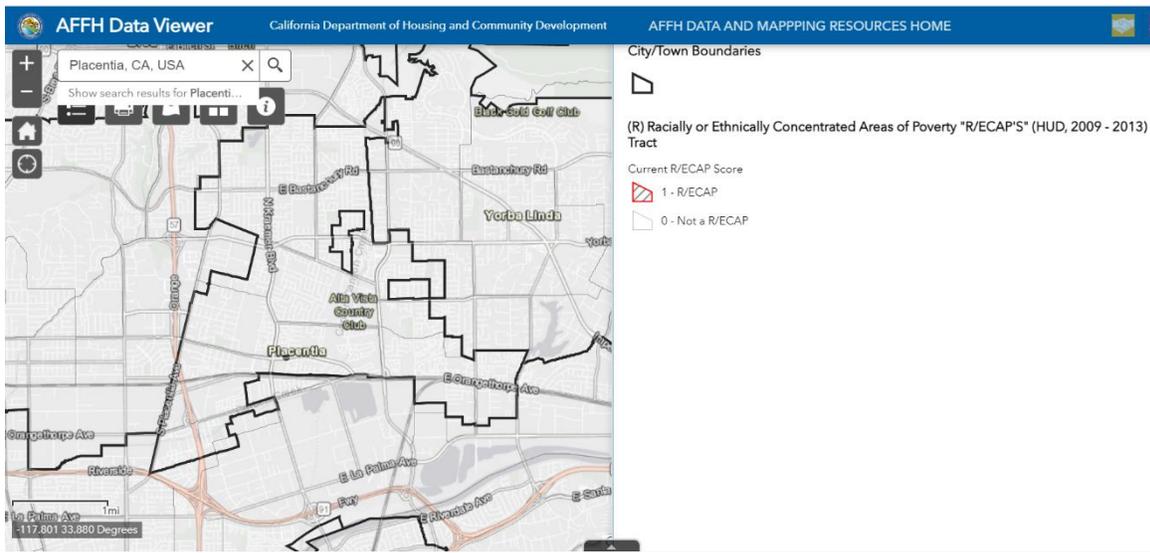


**C. Racially/Ethnically Concentrated Areas**

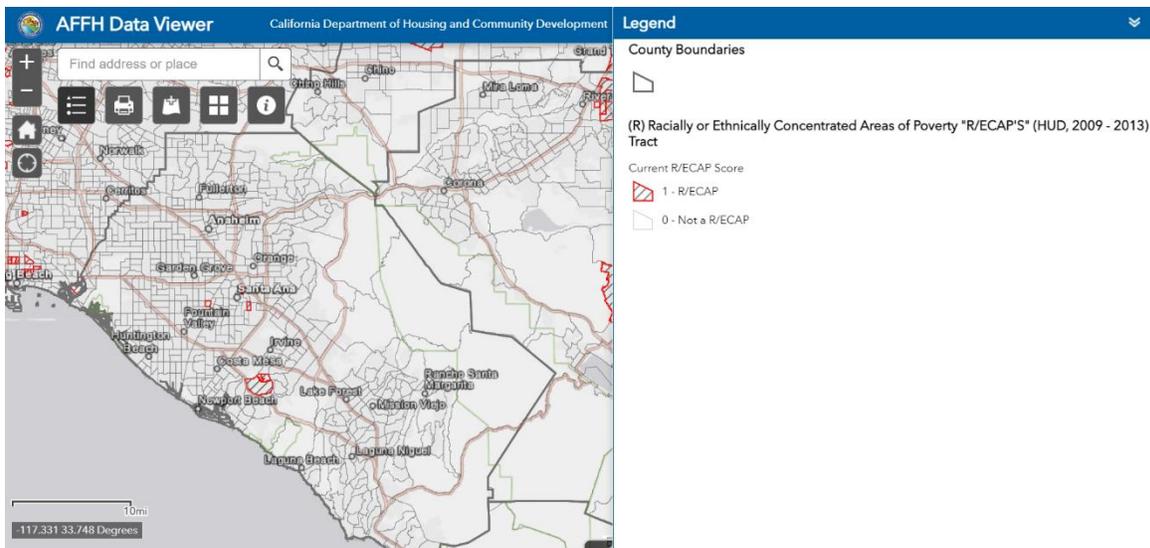
**1) Racially/Concentrated Areas of Poverty**

According to HUD, a racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50 percent or more of the population identifies as non-White and 40 percent or more of residents are living in poverty. As shown in Figure D-10, there are no designated R/ECAP areas in Placentia. The nearest R/ECAP areas are in the City of Santa Ana approximately 10 miles to the south of Placentia (Figure D-11).

**Figure D-10: Racially/Ethnically Concentrated Areas of Poverty – Placentia**



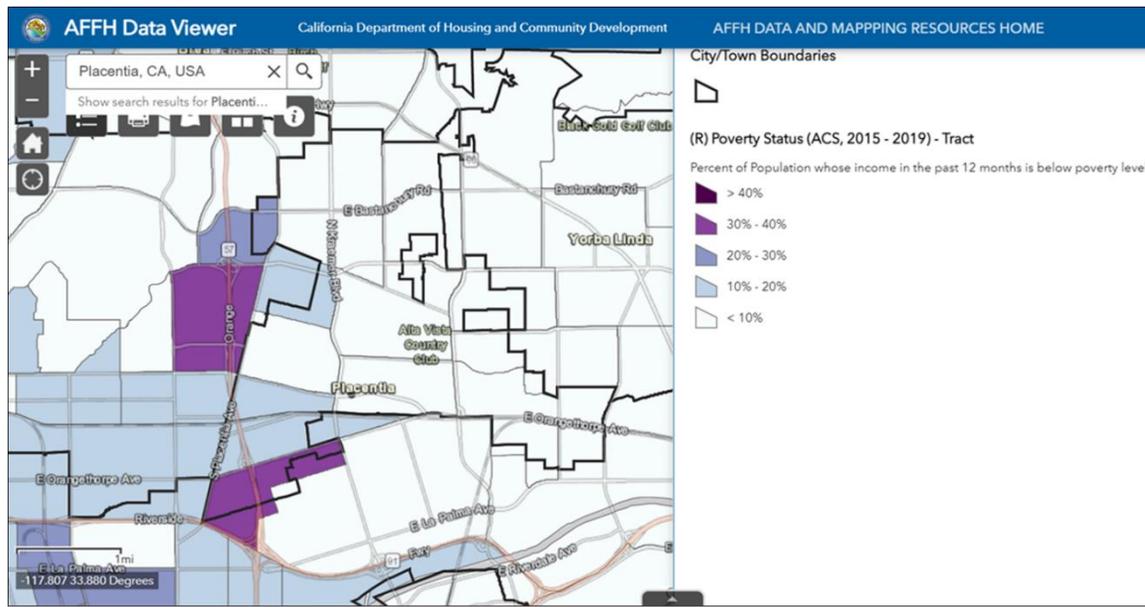
**Figure D-11: Racially/Ethnically Concentrated Areas of Poverty – Orange County**





Recent Census estimates regarding poverty status of households in Placentia are shown in Figure D-12. As seen in this map, poverty is highest (30-40%) in the southwestern portion of the city, which are also the areas with an older housing stock and lower housing values. Poverty rates in Placentia are similar to the adjacent areas of Brea, Yorba Linda, Fullerton and Anaheim. The area immediately west of Placentia in the City of Fullerton with a high incidence of poverty is comprised primarily of the campus of California State University, Fullerton, and is likely influenced by the relatively low incomes of college students.

Figure D-12: Poverty Status - Placentia



Program 2.1 in the Housing Plan includes training to landlords on requirements under fair housing law, such as the acceptance of Housing Choice Vouchers, and programs such as 1.3 (Pursue County, State, and Federal Housing Funds), 1.10 (Encourage Development of Housing for Extremely-Low-Income Households), 1.15 (Transit-Oriented Development), 1.19 (Accessory Dwelling Units), 2.2 (Section 8 Rental Assistance) and 2.4 (Comprehensive Housing Resource Directory) will help to expand the supply of affordable housing to provide more options for lower-income households throughout the city.

**2) Racially/Concentrated Areas of Affluence**

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices.” Therefore, both sides of the continuum must be examined. While HCD does not provide a standard definition for RCAAs and the HCD Data Viewer does not currently provide RCAA maps, available data regarding the percentage White population and median household income can provide insight into racially concentrated areas of affluence.

Table D-1 compares the median household incomes of White/non-Hispanic residents in Placentia and Orange County as a whole to the median incomes for the total population of the city and county. This table shows that in Placentia, the median income for non-Hispanic White households is about 4% higher



than for the city’s population as a whole. Countywide, the median income for non-Hispanic White households is about 13% higher than for the population as a whole. These data suggest that there is less racial concentration of affluence in Placentia that in Orange County as a whole.

**Table D-1: Median Household Income by Race – Placentia and Orange County**

<u>Median Household Income</u>	<u>Placentia</u>	<u>Orange County</u>
<u>White Alone (not Hispanic)</u>	<u>\$99,951</u>	<u>\$101,958</u>
<u>All Households</u>	<u>\$95,757</u>	<u>\$90,234</u>

Source: U.S. Census ACS 2015-2019  
 B19013 (all)  
 B19013H (white alone, not Hispanic)

## **D. Disparities in Access to Opportunity**

### **1) Overview**

California housing law requires cities to analyze disparities in access to opportunity as part of the fair housing assessment. The California Tax Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) have developed maps showing access to various types of opportunities such as education, economic, transportation, and environmental indicators.

### **2) Educational Opportunity**

The County AI<sup>5</sup> describes disparities in access educational opportunities across Orange County. Countywide, there are disparities across racial/ethnic groups in access to educational opportunities as measured by the index. Across all tracts in Orange County, non-Hispanic Whites exhibit the highest exposure to educational opportunity (index score of about 59) and non-Hispanic Asians second highest (53). Hispanics have the lowest access to these opportunities (31), with non-Hispanic Blacks in between (46).

Several jurisdictions score highly (index values at or above 60) on educational opportunity across all racial categories. These cities include Aliso Viejo, Huntington Beach, Irvine, Laguna Niguel, La Palma, Mission Viejo, and Rancho Santa Margarita.

Non-Hispanic Whites in Fountain Valley have high exposure to educational opportunity (scores of about 60), whereas Hispanics in the city do not (30). In both Fullerton and Tustin, Non-Hispanic Whites and Asians have much higher access than do Blacks and Hispanics.

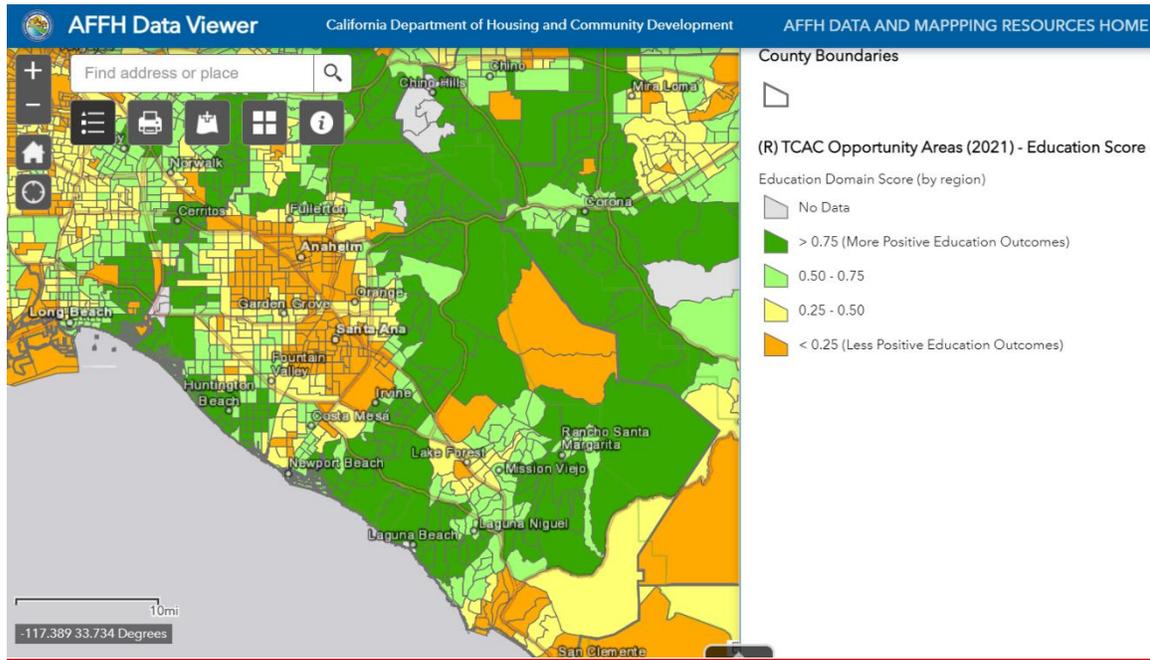
Jurisdictions with the highest educational opportunity also appear to have primarily large concentrations of non-Hispanic Whites and Asian/Pacific Islanders. Irvine, Aliso Viejo, and Huntington Beach are examples of cities with large populations of those two groups. Other high opportunity cities, by contrast appear more segregated and more heavily populated by non-Hispanic Whites. Rancho Santa Margarita and Mission Viejo are two examples of such places.

Educational opportunity scores for Orange County are shown in Figure D-13.

<sup>5</sup> P. 144



Figure D-13: TCAC Educational Opportunity Areas – Orange County



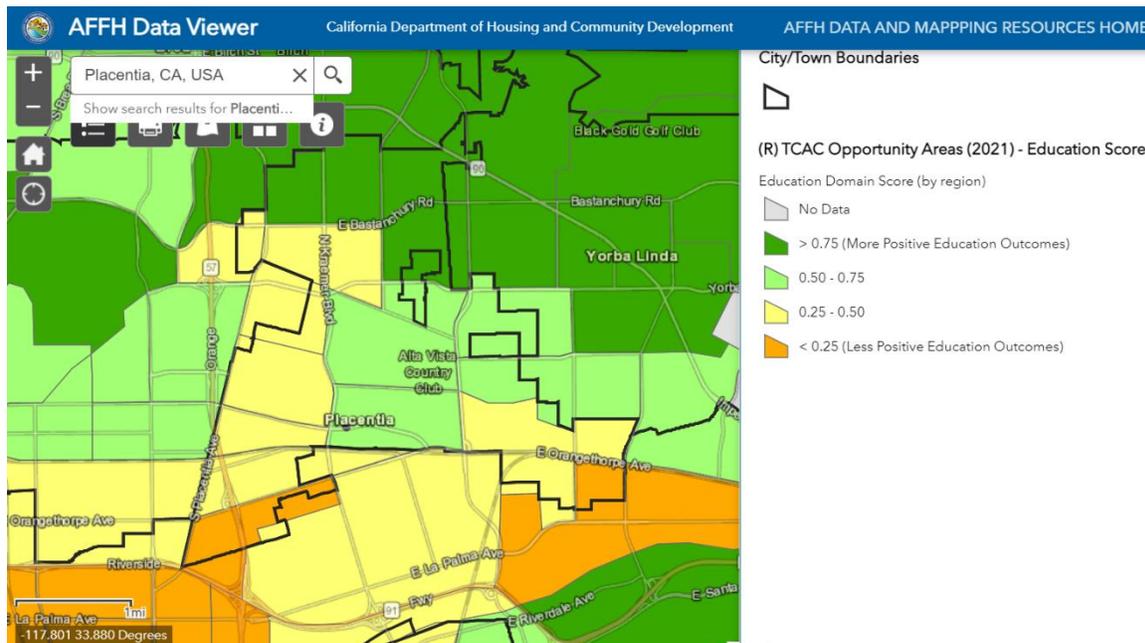
The City of Placentia is served by the Placentia-Yorba Linda Unified School District, which also serves the city of Yorba Linda, as well as portions of Anaheim, Brea, Fullerton and rapidly developing unincorporated territory that reaches the Riverside County line. The District maintains its reputation for academic excellence, remains fiscally solvent, and recently completed a \$600 million massive facilities modernization and new school construction program.

Student enrollment for the 2021-2022 school year is roughly 24,000. The District’s 34 school sites include 20 elementary schools, 5 middle schools, 1 K-8 school, 4 comprehensive high schools, 1 special education school, 1 continuation high school, 1 TK-12 home school, and 1 K-12 online school. Twenty-five schools have been designated California Distinguished Schools, eight have been named National Blue Ribbon Schools, seventeen have been honored as California Gold Ribbon Schools, one has earned the title of California Model Continuation High School, and another has received California's Exemplary Independent Study recognition. The District has been placed on the College Board’s AP District Honor Roll three times since the program’s inception in 2011. PYLUSD high schools are consistently named to America’s Best High Schools rankings issued by Newsweek, U.S. News and World Report, and other news organizations.

As shown in Figure D-14, TCAC educational opportunity scores are highest in the northern portion of the city and lowest in the southwestern portion of the city.



**Figure D-14: TCAC Educational Opportunity Areas – Placentia**



**3) Economic Opportunity**

In Orange County, there are significant disparities in access to economic opportunity, as seen in Figure D-15. Non-Hispanic White residents have the greatest access to economic opportunity. Asian and Pacific Islander residents (49), Native Americans (46), and Black residents (46) have lower index scores in the high to mid-40s. Hispanic residents (32) have the lowest access to economic opportunity of all racial and ethnic groups in Orange County.

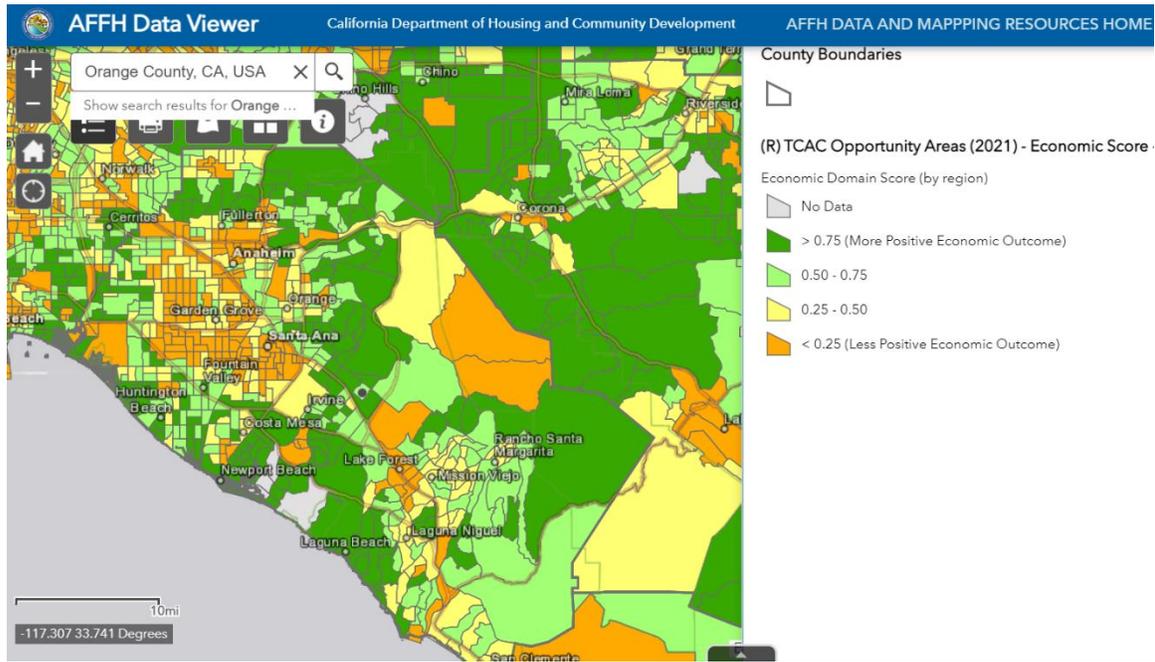
A number of jurisdictions have relatively little disparity between groups. There are high economic opportunity scores for all racial and ethnic groups in Aliso Viejo and Irvine (high 60s to low 70s). La Palma also has relatively high opportunity and little variation in scores between groups (index values ranging from 60 to 66). Huntington Beach, Laguna Niguel, Mission Viejo, and Rancho Santa Margarita have moderate economic opportunity scores for all racial/ethnic groups (scores from the mid-40s to mid-50s).

Economic Opportunity Index scores are generally lower in North Orange County than in South County. Scores are especially low in Westminster, Garden Grove, and much of Santa Ana and Anaheim. Scores are generally high in much of Irvine, La Palma, and Tustin and along the coast from Newport Beach to Laguna Niguel as well as in unincorporated areas near the eastern border with Riverside County.

Areas in Orange County with the highest index scores tend to have large concentrations of non-Hispanic and Asian residents. By contrast, areas with the highest concentration of Hispanic residents tend to have lower economic index scores. Cities such as Fullerton and Costa Mesa are examples of localities with segregated living patterns and significant disparities between racial and ethnic groups. Neighborhoods in these cities with higher Hispanic populations score lower than neighborhoods that are heavily populated by non-Hispanic and Asian residents.

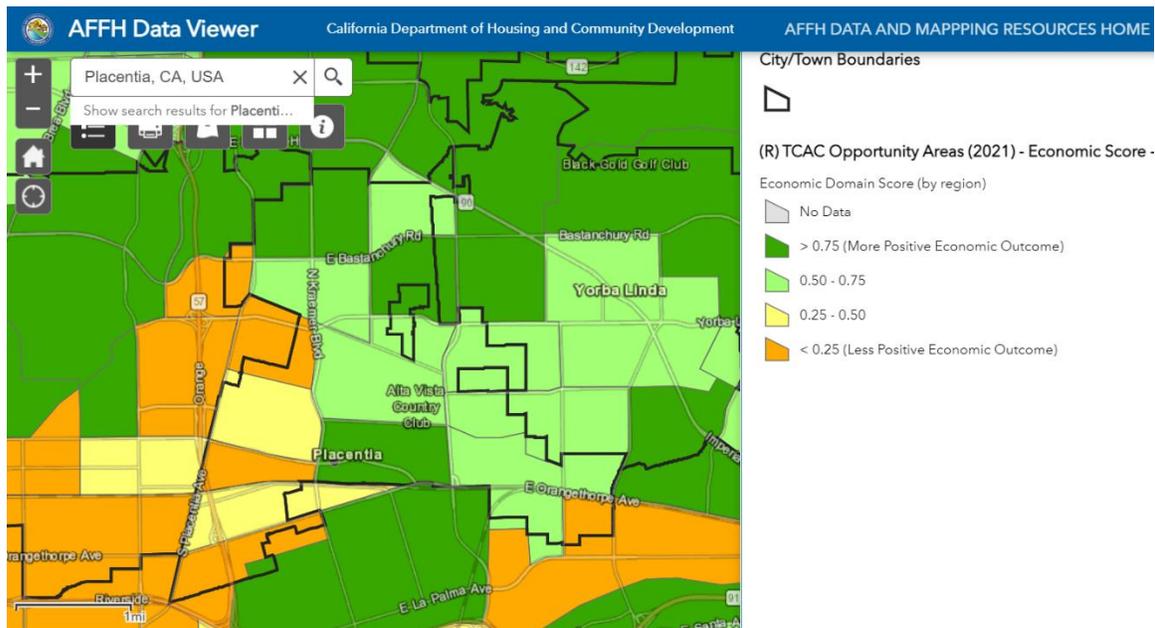


Figure D-15: TCAC Economic Opportunity – Orange County



In Placentia, the highest economic opportunity scores are in the northern and eastern portions of the city (Figure D-16). These disparities are similar to those for educational opportunity scores.

Figure D-16: TCAC Economic Opportunity – Placentia





#### 4) Transportation Opportunities

According to the County AI, low transportation cost index scores as well as transit index scores are generally higher in North Orange County than in South Orange County. Scores are generally higher in jurisdictions with greater levels of density. In Placentia, proximity to the SR-57 and SR-91 freeways, OCTA bus routes and the Metrolink light rail system provide access to many transit options. The new Placentia Metrolink station is conveniently located at Melrose Avenue and Crowther Avenue near the Orange Freeway (SR-57), serving the communities of Anaheim, Fullerton, Placentia, and Yorba Linda. The Placentia Station serves the Metrolink 91 Line that extends to Riverside, Fullerton, and Downtown Los Angeles. OCTA and the City of Placentia are also constructing a new shared-use multi-story parking structure to provide increased travel options for riders.

#### 5) Environmental Opportunities

The County AI notes that there are disparities across racial/ethnic groups in access to environmental opportunities, measured as lower exposure to and effects from pollution (Figure D-17). Across all tracts in Orange County, non-Hispanic Whites exhibit the highest access to environmentally healthy neighborhoods (index score of about 54). All other racial/ethnic groups obtain lower index scores in the 40s: Hispanics score lowest at 41, followed by non-Hispanic Blacks (45), non-Hispanic Asian/Pacific Islander (47), and non-Hispanic Native American (48).

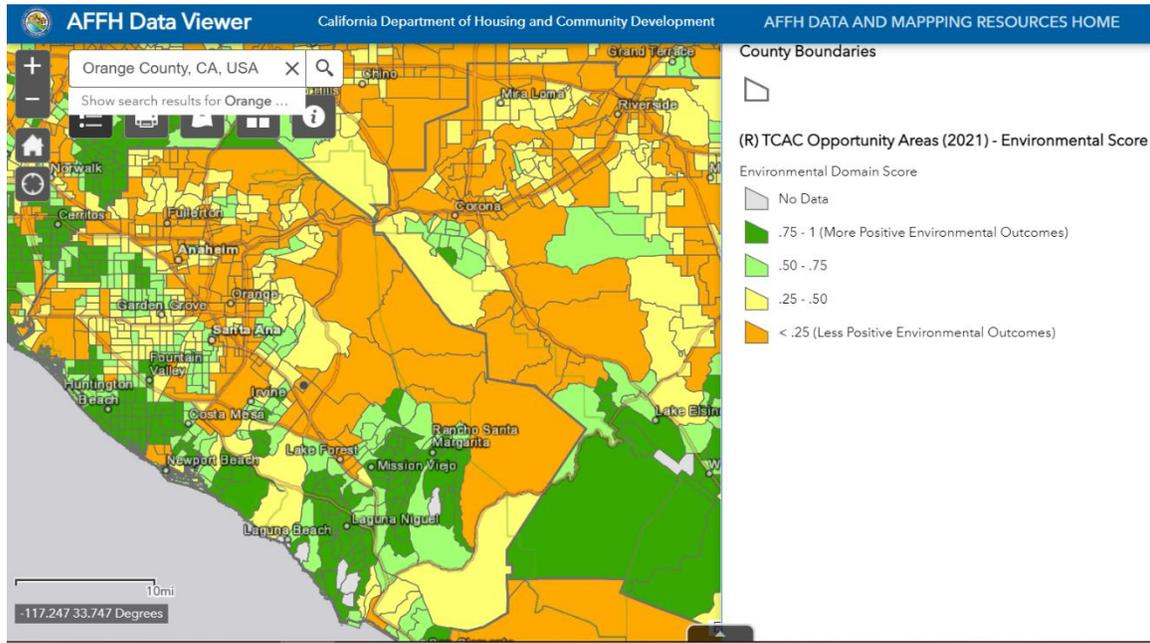
Several jurisdictions score especially highly on environmental opportunity across all racial categories. Laguna Niguel, Aliso Viejo, Mission Viejo, and Rancho Santa Margarita all have index scores in the 70s to 90s for all racial and ethnic groups. Fountain Valley and Huntington Beach also have higher access to environmental health, scoring in the 50s to low-70s on the index. Other cities are low-scoring across the board. Orange City, La Habra, and Fullerton are the least environmentally healthy, with index scores in the 20s. Anaheim, Buena Park, Irvine, Santa Ana, and Westminster also have low access to environmental opportunity, scoring in the 30s to 40s on the index.

Jurisdictions with the highest environmental opportunity appear to have primarily large concentrations of non-Hispanic Whites and Asian/Pacific Islanders. Laguna Niguel, Aliso Viejo, Fountain Valley, and Huntington Beach are good examples of cities with large populations of those two groups. Other high opportunity cities, by contrast appear more segregated and more heavily populated by non-Hispanic Whites. Rancho Santa Margarita, and Mission Viejo are two examples of such places.

Lower-scoring cities exhibit a diversity of residential patterns. For example, Orange (city) has concentrations of both Hispanics and non-Hispanic Whites. Similarly, Fullerton has concentrations of Hispanic neighborhoods as well as non-Hispanic Whites and Asian/Pacific Islanders. Anaheim and La Habra follow a similar pattern. By contrast, Santa Ana is a city with low environmental quality that is characterized almost exclusively by dense concentrations of Hispanics.

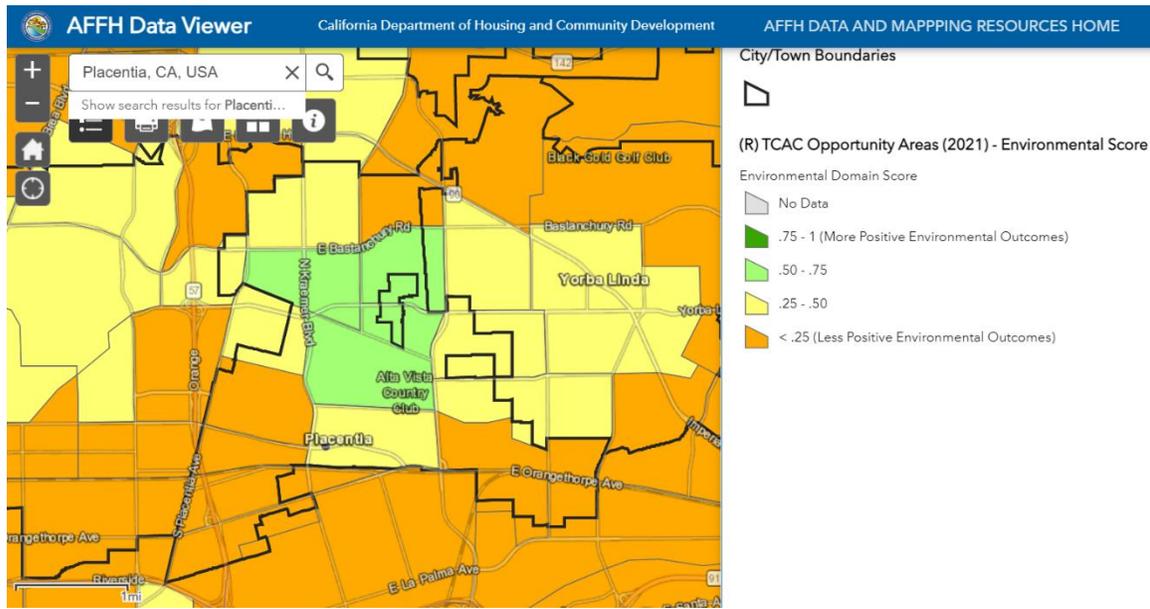


Figure D-17: TCAC Environmental Opportunity – Orange County



In Placentia, the highest environmental opportunity scores are found in the central portion of the city (Figure D-18) while neighborhoods in the southwestern and northeastern portions of the city show lower scores.

Figure D-18: TCAC Environmental Opportunity – Placentia

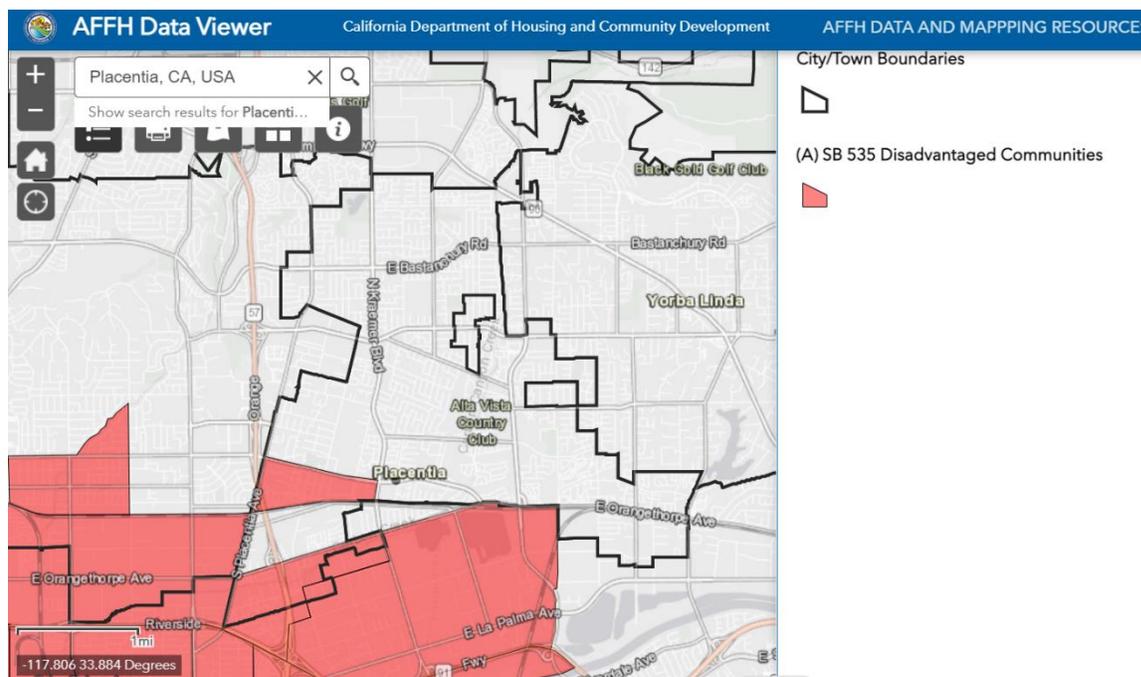




## 6) Disadvantaged Communities

Senate Bill 1000 (SB 1000) requires cities with designated disadvantaged communities to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities. CalEnviroScreen examines various indicators to characterize pollution and socioeconomic factors. As seen in Figure D-19 below, two areas in the southeastern portion of Placentia are classified as disadvantaged communities. The Placentia General Plan includes policies to address environmental justice consistent with SB 1000.

**Figure D-19: Disadvantaged Communities – Placentia**



## E. Disproportionate Housing Needs and Displacement Risk

The AFFH Rule Guidebook (24 C.F.R. § 5.152) defines “disproportionate housing needs” as “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.” The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing. In addition, this analysis examines homelessness and displacement risk.

### 1) Cost Burden (Overpayment)

A household is considered cost-burdened if it spends more than 30 percent of its income in housing costs, including utilities. Reducing housing cost burden can also help foster more inclusive communities and increase access to opportunities for persons of color, persons with disabilities, and other protected classes.



Overpayment is a problem for many Placentia residents, particularly for lower-income households. According to recent HUD estimates (Figure D-20) approximately 2,940 renter households (50% of all renters) and 3,260 owner households (30% of all owners) were paying more than 30% of income for housing. The highest rates of overpayment occur among very-low-income and extremely-low-income households. The impact of housing overpayment on lower income households is particularly significant for special needs populations – seniors, persons with disabilities, and female-headed households with children.

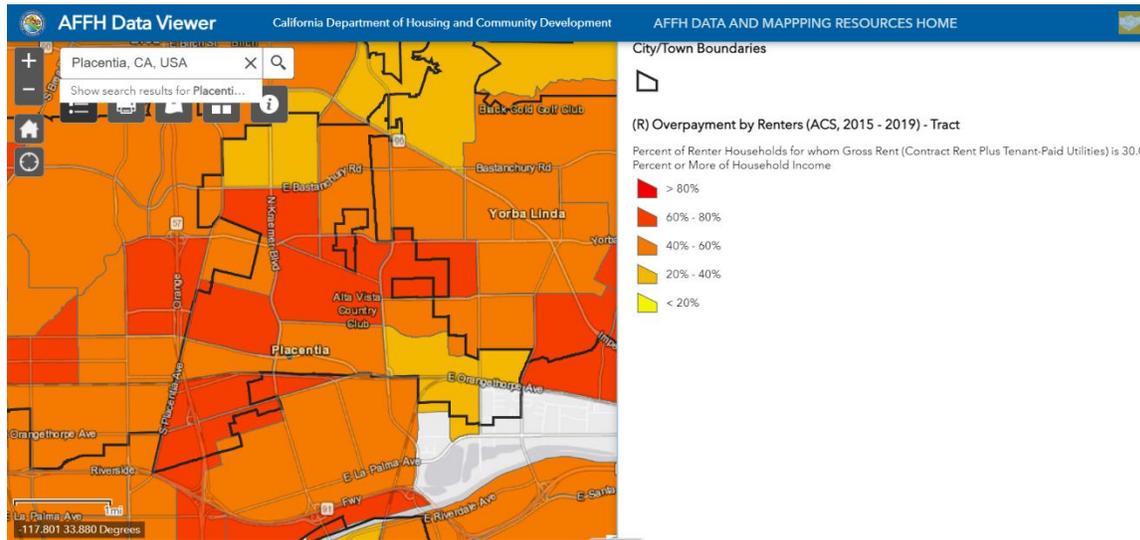
**Figure D-20: Cost Burden by Tenure and Income Category - Placentia**

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	845	785	1,015
Household Income >30% to less-than or= 50% HAMFI	850	465	1,015
Household Income >50% to less-than or= 80% HAMFI	870	195	1,360
Household Income >80% to less-than or= 100% HAMFI	295		855
Household Income >100% HAMFI	80		1,575
<b>Total</b>	<b>2,940</b>	<b>1,445</b>	<b>5,825</b>
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	605	400	865
Household Income >30% to less-than or= 50% HAMFI	345	170	695
Household Income >50% to less-than or= 80% HAMFI	870	345	1,750
Household Income >80% to less-than or= 100% HAMFI	465	65	1,115
Household Income >100% HAMFI	975	30	6,320
<b>Total</b>	<b>3,260</b>	<b>1,010</b>	<b>10,750</b>

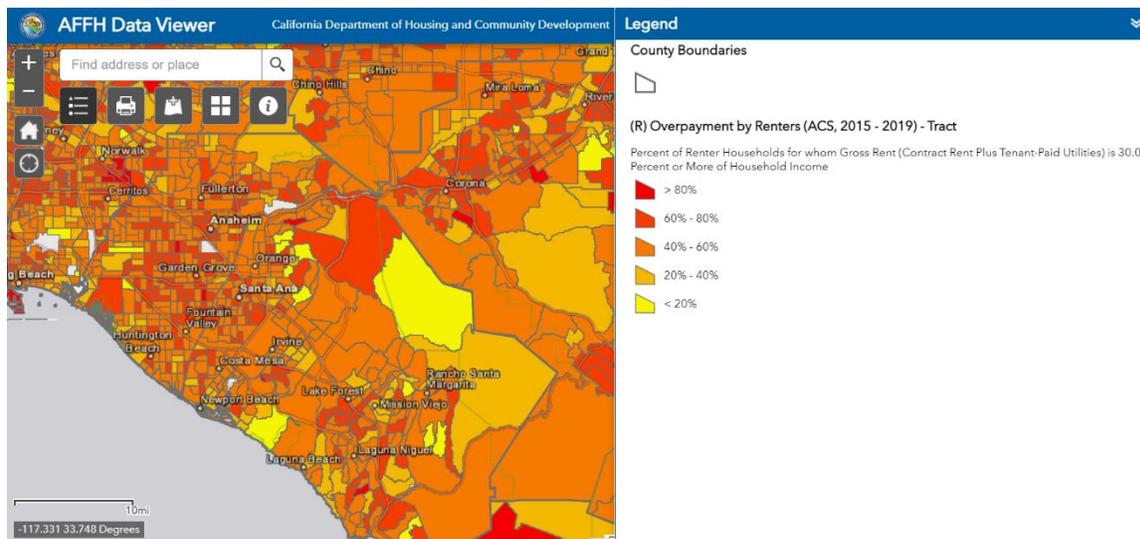
As shown in Figure D-21, overpayment among renters is most prevalent in the central and southern portions of the city. When compared to conditions in other areas of Orange County (Figure D-22) overpayment among Placentia renters appears to be similar to adjacent communities.



**Figure D-21: Renters Overpaying for Housing - Placentia**



**Figure D-22: Renters Overpaying for Housing – Orange County**



Overpayment among Placentia homeowners is highest in the central and southwestern portions of the city (Figure D-23). Countywide, rates of overpayment among homeowners in Placentia appear similar to other communities.

The problems of overpayment are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Program 1.3: Pursue County, State, and Federal Housing Funds, Program 1.8: Adequate Sites for Housing Development, Program 1.10: Encourage Development of Housing for Extremely-Low-Income Households, Program 1.11: Density Bonus Ordinance, Program 1.13: Development of Housing for Larger Families, Program 2.2: Section 8 Rental Assistance, Program 2.4: Comprehensive Housing Resource Directory, Program 3.5: Monitor and Preserve At-Risk Units, Program 4.1: Partnerships with the Housing Industry).



Figure D-23: Homeowners Overpaying for Housing – Placentia

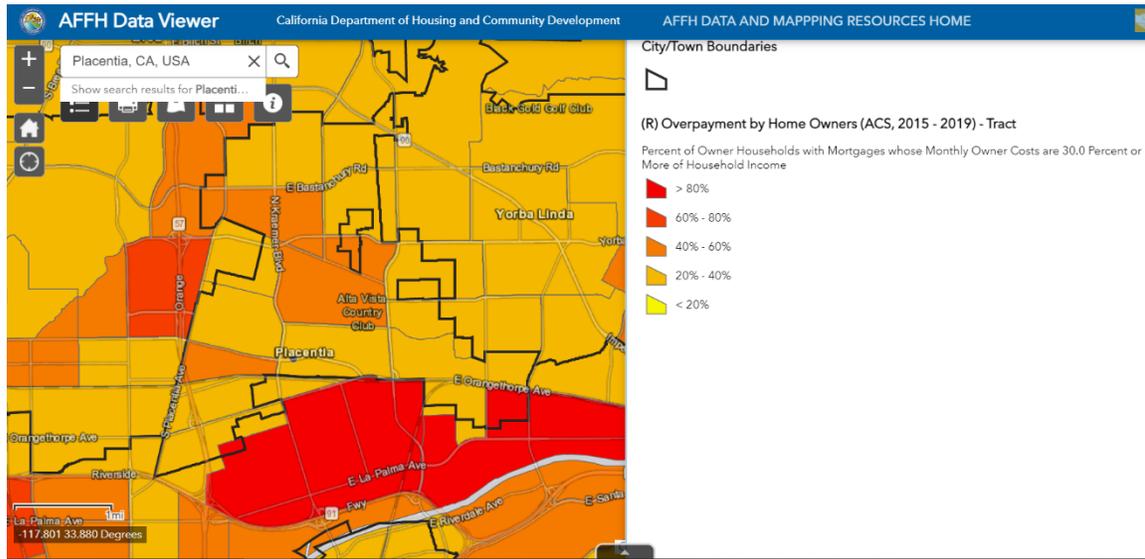
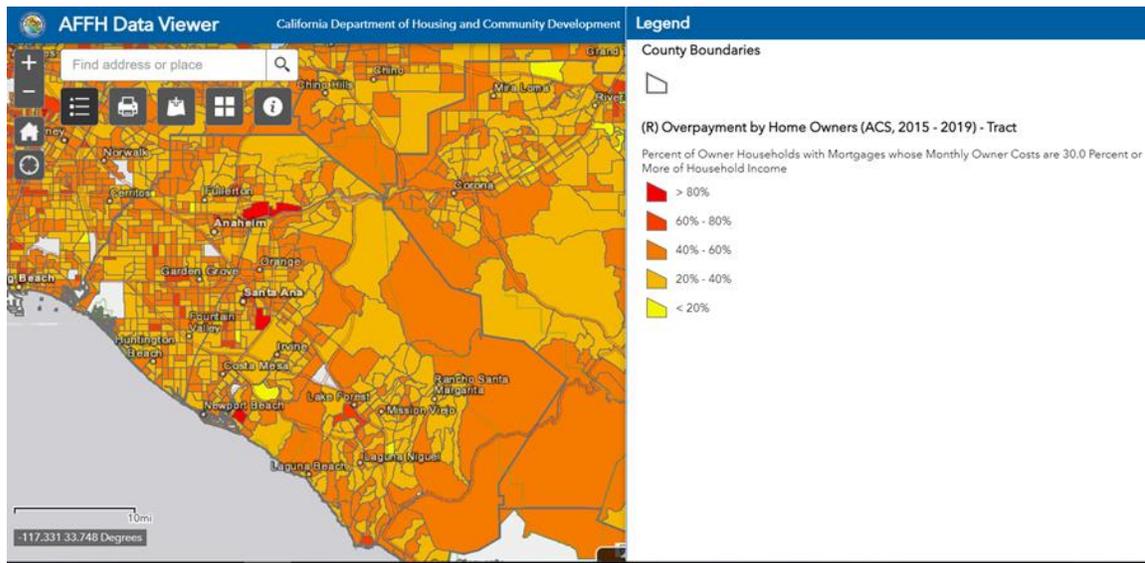


Figure D-24: Homeowners Overpaying for Housing – Orange County



2) Overcrowding

“Overcrowding” is defined as a housing unit occupied by more than 1.01 persons per room (excluding kitchens, porches, and hallways). A unit with more than 1.51 occupants per room is considered “severely overcrowded.” The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding is also related to overpayment, because households may not be able to afford a large enough home to accommodate their needs. Overcrowding can lead to a variety of other problems such as lower educational performance among children, psychological stress and adverse health impacts.



The County AI reported that for Orange County as a whole, White residents experience an overcrowding rate of 1.95%, Black residents 6.52%, Native American residents 11.38%, Asian American or Pacific Islander residents 7.76%, and Hispanic residents 25.72%. Hispanic residents face especially high rates of overcrowding. This is especially true in Anaheim and Santa Ana, where their rates of overcrowding are 29.07% and 42.93%, respectively. Overcrowding in Orange County is illustrated in Figure D-26.

In Placentia, the highest rates of overcrowding occur in the southwestern portion of the city (Figure D-25), which are also the areas with higher percentages of minority residents.

The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Program 1.3: Pursue County, State, and Federal Housing Funds, Program 1.8: Adequate Sites for Housing Development, Program 1.10: Encourage Development of Housing for Extremely-Low-Income Households, Program 1.11: Density Bonus Ordinance, Program 1.13: Development of Housing for Larger Families, Program 2.2: Section 8 Rental Assistance, Program 2.4: Comprehensive Housing Resource Directory, Program 3.5: Monitor and Preserve At-Risk Units, Program 4.1: Partnerships with the Housing Industry).

Figure D-25: Overcrowded Households – Placentia

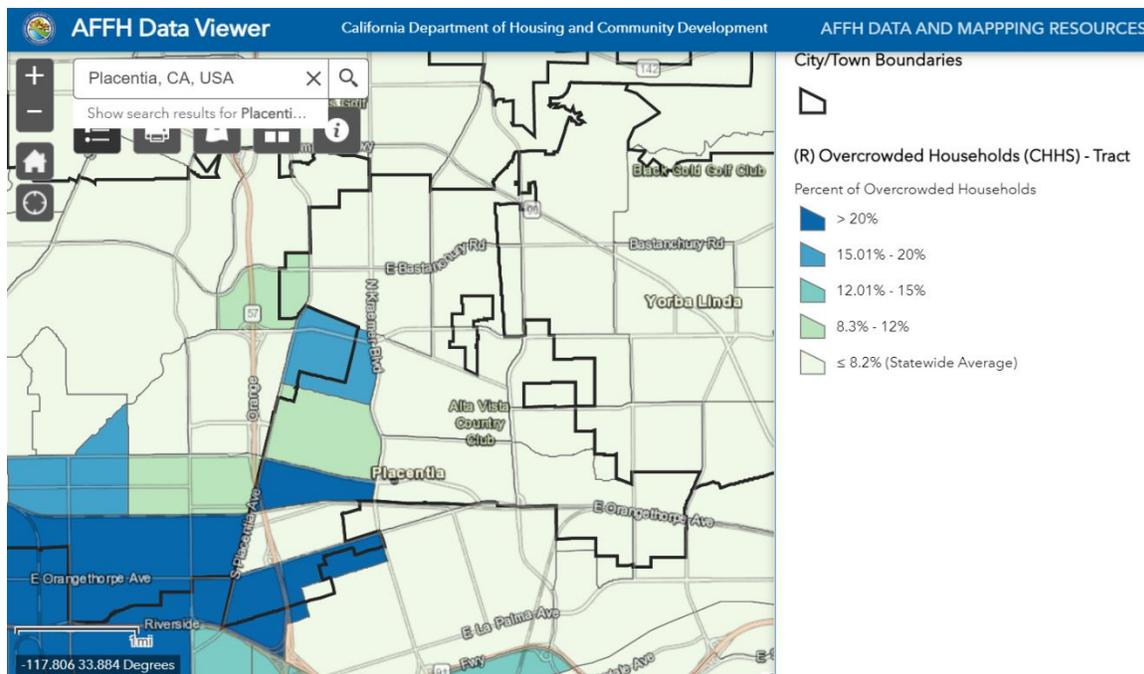
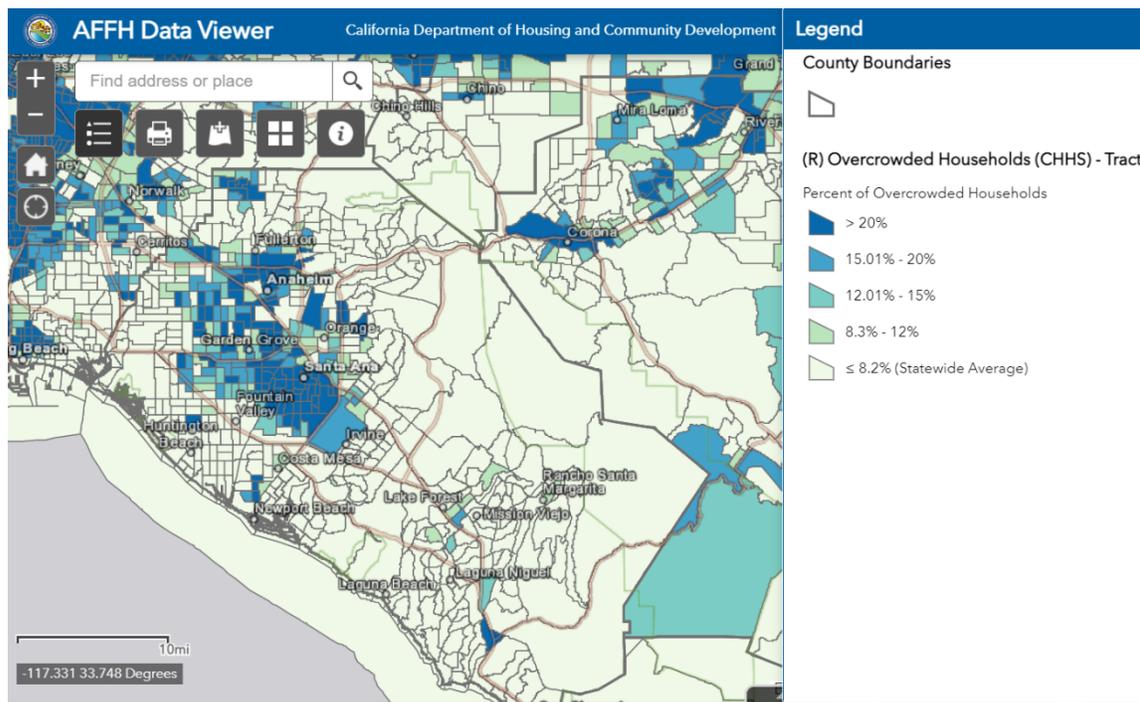




Figure D-26: Overcrowded Households – Orange County



### 3) Substandard Housing

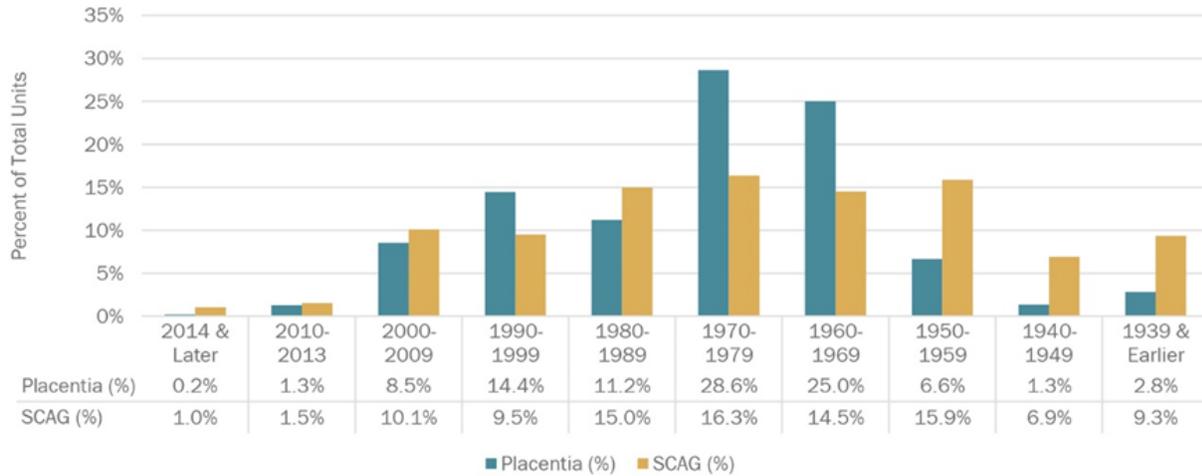
The age of a housing unit is often an indicator of housing conditions. Housing units without proper maintenance can deteriorate over time. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls or is pulverized by windows and doors opening and closing.

Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs. Additionally, older units may not be built to current building standards for fire and earthquake safety.

The age of housing units in Placentia compared to the SCAG region as a whole is shown in Figure D-27. Nearly two-thirds of Placentia’s housing units were constructed prior to 1980 and are now more than 40 years old. These findings suggest that there may be a substantial need for maintenance and rehabilitation, including remediation of lead-based paint. Based upon field observations of City building inspectors and code enforcement staff, it is estimated there are more than 200 substandard housing units currently in the City, which are primarily concentrated in the La Jolla and Santa Fe areas. Less than 5% of those (10 units) are estimated to have structural problems that are not feasible to repair and therefore are in need of total replacement. Housing programs to assist lower-income households with needed repairs are described in Chapter 4 and include Program 3.1: Community Based Neighborhood Rehabilitation and Program 3.3: Placentia Rehabilitation Grant Program.



**Figure D-27: Age of Housing Units – Placentia vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

#### 4) Homelessness

The Orange County homeless population includes many working families and individuals who live in cars, parks, under bridges, in motels and in homeless shelters trying to maintain their dignity while they struggle to survive. As a result, most homeless remain hidden. The most recent available Orange County Point-in-Time Count and Survey report of the Homeless (2019) reported 55 unsheltered and 108 sheltered homeless persons in Placentia.

Regional strategies to combat homelessness are developed through Orange County’s Continuum of Care System. The goal of the Continuum of Care Strategic Plan is to work toward a seamless system of care through advocacy, homeless prevention, outreach and assessment, emergency shelter, transitional shelter and permanent affordable housing.

Persons threatened with homelessness are often those with incomes at 30% of area median income or below who are paying more than 30% of their income for rent.

The nonprofit 2-1-1 Orange County organization is a 24-hours-a-day, 7 days-a-week, toll-free number that people in need of assistance can call to obtain comprehensive information and referrals to health and human services. Available services include food, shelter, government assistance programs, urgent care, substance abuse and treatment programs, and workforce development.

In early 2019 the North Orange County Service Planning Area for Homelessness Outreach Efforts had reached an important milestone. A regional partnership of 13 cities located in northern Orange County (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park, and Yorba Linda) came together to share intelligence and resources to address regional homelessness. Their concept was to promote greater regional coordination on homeless issues while reducing the span of control regarding working with the County of Orange and others.



After months of extensive discussions, negotiations and assessments, two locations within the North Orange County Service Planning Area were identified for the development of “navigation centers” based on a number of factors including zoning, proximity to related services and site availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to a shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in the city of Anaheim that accommodated 325 new beds.

Funding for the Navigation Centers was secured through application and governmental meetings with state, regional, county and local officials resulting in the \$12 million in State of California Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of the navigation centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing operation of the navigation centers. A Memorandum of Understanding was prepared and presented to the city councils of all 13 cities in May 2019. Construction began in 2019 and the opening of the first 100-bed Navigation Center in Placentia occurred on March 31, 2020. This groundbreaking success story was born of the regional need and public official desire to come together to address homelessness and pioneer the way to create and operate a multi-jurisdictional homelessness facility. Program 1.4: Emergency Shelters, Low Barrier Navigation Centers, Transitional and Supportive Housing and Agricultural Employee Housing, Program 1.14: Housing for Persons with Special Needs, and Program 2.3: Minimize Constraints on Housing for Persons with Disabilities are included in the Housing Plan to describe actions the City is taking to address the issue of homelessness.

### **5) Displacement Risk**

In 2016, the UCLA Urban Displacement Project<sup>6</sup> team developed a neighborhood change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The database includes Los Angeles, Orange, and San Diego counties, with gentrification and sociodemographic indicators based on data from the Census Bureau American Community Survey and shows whether each Census tract gentrified between 1990 and 2000; gentrified between 2000 and 2015; gentrified during both of these periods; or exhibited characteristics of a “disadvantaged” tract that did not gentrify between 1990 and 2015.

Based on this neighborhood change database, the UCLA team found that of the three counties, Orange County exhibited the greatest share of neighborhoods that were considered to be “disadvantaged” and potentially susceptible to gentrification (~43%).

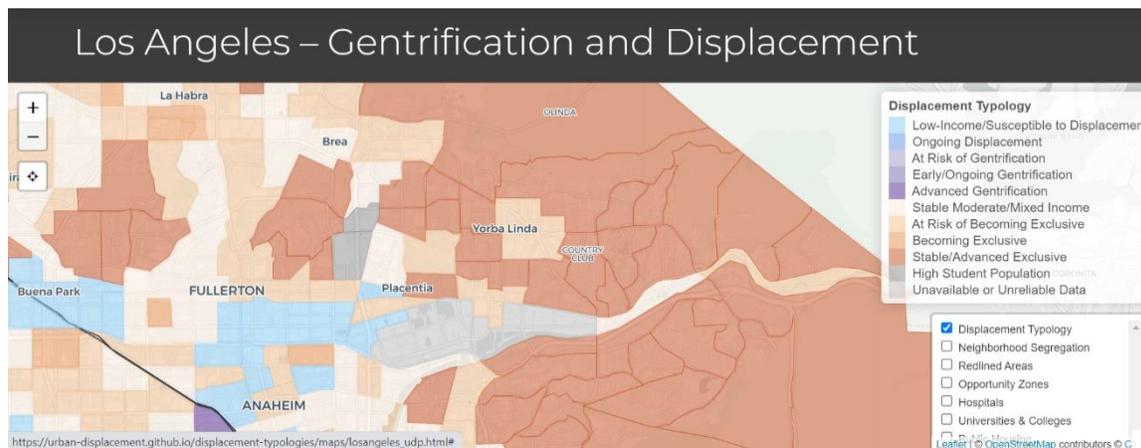
The areas most susceptible to displacement in northern Orange County are portions of Buena Park, Fullerton, Anaheim and Garden Grove. The eastern, south and coastal communities are primarily exclusive or at risk of becoming exclusive. Figure D-28 shows the displacement typology levels for Placentia and adjacent areas. The northern portion of the city and the area near Alta Vista Country Club are identified as “Stable/Advanced Exclusive” while other areas in the western portion of the city are considered “Stable Moderate/Mixed Income” or “Low Income/Susceptible to Displacement.”

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<sup>6</sup> <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/>



**Figure D-28: Displacement Typologies - Placentia**



As noted in the Housing Plan, Program 1.8: Adequate Sites for Housing Development includes a commitment to ensure compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments.

As discussed in Section 2.3 of the Housing Needs Assessment, there is one assisted low-income housing development in Placentia – Imperial Villas – that is at risk of conversion to market rate in the next 10 years. Program 3.5: Monitor and Preserve Affordable Housing At-Risk of Conversion to Market Rate is included in the Housing Plan to facilitate the preservation of these affordable units.

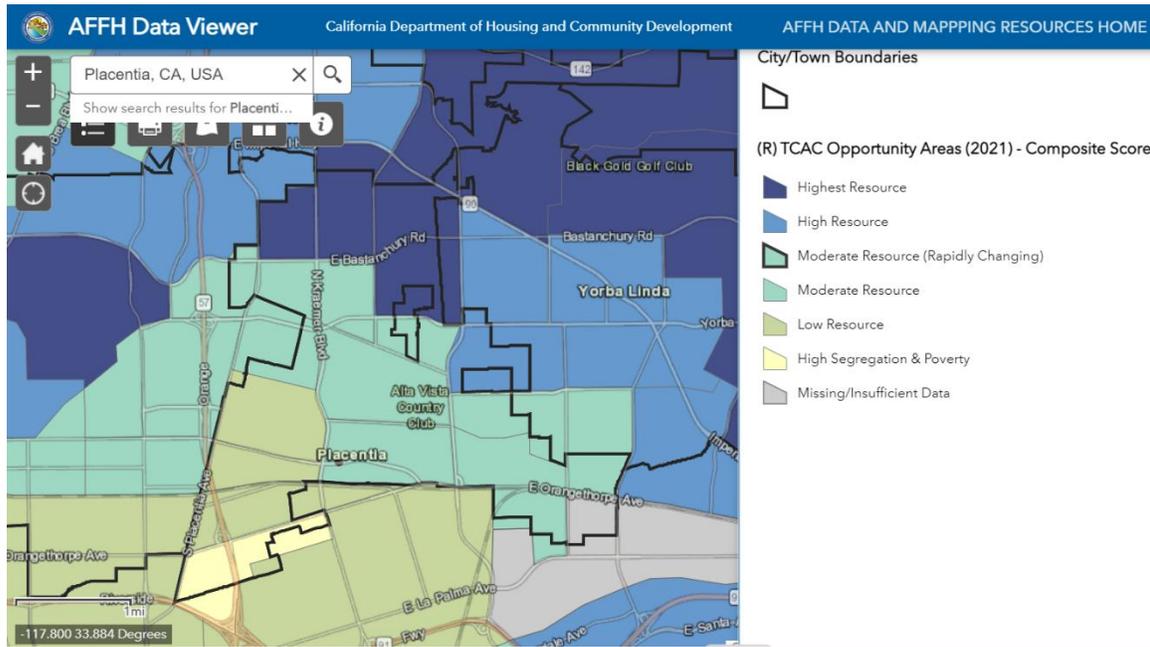
### **3. Sites Inventory Analysis**

The City’s inventory of sites for potential housing is presented in Appendix B. As summarized in Table B-1, the inventory is comprised of approved projects, vacant sites, non-vacant underutilized sites and future ADUs. The sites analysis shows that as with most cities in the metro areas of Southern California, vacant developable land is very rare and underutilized sites provide the majority of future housing capacity.

As illustrated in Figures B-2 through B-5 in Appendix B, the focus of the Placentia sites inventory is on redevelopment of underutilized sites in the commercial and light industrial areas near the new Metrolink rail station. While most of these sites are within areas designated by the TCAC/HCD opportunity maps as Low Resource or High Segregation and Poverty, they provide the most significant potential for new housing development because most other areas are developed with stable residential neighborhoods with minimal potential for redevelopment.



**Figure D-29: TCAC Opportunity Areas Composite Score - Placentia**



While former commercial and light industrial areas provide the largest component of the potential residential inventory, it is important to recognize that existing residential neighborhoods also provide substantial potential for new housing in areas of higher opportunity through ADUs and SB 9 urban lot splits.

**4. Contributing Factors**

The housing element must include an identification and prioritization of significant contributing factors to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs. “Fair housing contributing factor” means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all the prior efforts and analyses: outreach, assessment of fair housing, and site inventory. Contributing factors must also be prioritized in terms of needed impact on fair housing choice and strongly connect to goals and actions.

Through the participation of stakeholders, fair housing advocates, and the assessment of fair housing issues described in this appendix, the City has identified fair housing issues and contributing factors as well as meaningful actions to address those issues as described in Table D-2: Fair Housing Issues, Contributing Factors and Meaningful Actions.

**5. Goals, Policies and Actions**

Based upon the analysis presented above, the City has identified fair housing issues, contributing factors, and meaningful actions that will be taken to address those issues during the planning period. The 2020-2024 Orange County Analysis of Impediments to Fair Housing Choice prepared by the Urban County consortium, of which Placentia is a participating jurisdiction, was of key importance in helping to identify these issues, contributing factors and actions.



**Table D-2: Fair Housing Issues, Contributing Factors and Meaningful Actions**

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
<p><u>Fair Housing Outreach</u></p>	<p><u>1. Lack of local private fair housing outreach and enforcement may be a significant contributing factor to fair housing issues in Orange County. Although Orange County is served by two high-quality private, non-profit fair housing organizations, they are underfunded and understaffed in comparison to the total need for their services. Victims of discrimination would be more able to exercise their rights, thus deterring future discrimination, if the capacity of existing organizations grew to meet the scale of the problem.</u></p> <p><u>2. Lack of local public fair housing outreach and enforcement may also be a significant contributing factor to fair housing issues in Orange County. There are no local public entities that conduct fair housing outreach and enforcement, with the California Department of Fair Employment and Housing and HUD constituting the only public enforcement bodies that operate in Orange County. Advocates across Orange County and the state of California have reported issues with the timeline of the California Department of Fair Employment and Housing’s investigations and the standards that it applies in making probable cause determinations. A local public enforcement agency, if created, would have the potential to be more responsive to victims of discrimination in Orange County than either the state or HUD.</u></p>	<p><u>High</u></p>	<p><u>The City will continue to disseminate information regarding fair housing in a variety of locations including City Hall, the City website and the library, and conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.</u></p> <p><u>The City will continue to seek funding to support the Fair Housing Council of Orange County (FHCOC), which provides community education, individual counseling, mediation, and low-cost advocacy with the expressed goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire.</u></p> <p><u>The City will invite FHCOC to conduct annual fair housing outreach targeted to Placentia residents and landlords. (Program 2.1)</u></p>
<p><u>Access to Opportunity</u></p>	<p><u>Lack of access to opportunity due to high housing costs may be a significant contributing factor to fair housing issues in Orange County. In Placentia, while access to quality transportation and educational resources is generally good throughout the city, the western portions of the county have lower economic and environmental opportunity than do the central and northern areas. Increasing housing affordability in those areas would make it easier for low-income households to access the types of services and amenities that further social mobility.</u></p>	<p><u>High</u></p>	<p><u>The City will seek to improve access to opportunity in the following ways:</u></p> <p><u>Program HE-1.2: Locate Housing Near Transportation, Employment and Services</u></p> <p><u>To increase livability within new housing developments, the City shall encourage and coordinate the location of major housing developments, particularly affordable housing and multi-family units, near transportation options, major employment centers and services.</u></p> <p><u>Program HE-1.3: Pursue County, State, and Federal Housing Funds</u></p>

Appendix D: Affirmatively Furthering Fair Housing



Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
			<p><u>Monitor availability of county, state, and federal housing programs and pursue available funds on an annual basis.</u></p> <p><u>Program HE-1.8: Adequate Sites for Housing Development</u>  <u>To ensure the availability of adequate sites to accommodate the City’s assigned housing need, the City will rezone additional land to accommodate the shortfall of lower-income sites compared to the RHNA allocation in all income categories, as identified in Appendix B. The City shall encourage the development of housing through financial incentives (such as land write-downs; assistance with on- or off-site infrastructure costs, fee waivers, or deferrals to the extent feasible); expedited entitlement review; in-kind technical assistance; and other regulatory concessions or incentives, and provide incentives for lot consolidation.</u></p> <p><u>Program HE-1.11: Density Bonus Ordinance</u>  <u>The City provides incentives and concessions to facilitate development of lower-income housing units through its Density Bonus Ordinance. To ensure that City regulations are consistent with recent changes to State law, the City will process an amendment to the ordinance in 2022.</u></p> <p><u>Program HE-1.15: Transit-Oriented Development</u>  <u>Transit-Oriented Development (TOD) is a compact mixed-use or commercial area designed to maximize access to public transport, and often incorporates features to encourage transit ridership. Consistent with federal, state and regional policies focusing on concentrated growth around transit, in 2017 the City Council adopted the TOD Packing House zoning district, which allows densities up to 95 du/acre near the future Metrolink Station. Since then, 633 multi-family units have been entitled in the TOD District. Also in 2017, the Old Town Zoning District was adopted, which includes a sub-area allowing high-density housing by-right up to 65 units per acre. Development incentives include the utilization of City-owned property as well as reduced parking requirements, financial assistance, density bonus, and regulatory waivers. To expand housing</u></p>

Appendix D: Affirmatively Furthering Fair Housing



Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
			<p><u>opportunities, an amendment to the TOD zone will processed to extend the district as described in Program 1.8 and Appendix B.</u></p> <p><u>Program HE-1.19: Accessory Dwelling Units</u></p> <p><u>Accessory dwelling units (also known as ADUs, second units or granny flats) can help to address a portion of the city’s housing needs, particularly for small lower-income households. The City will continue to monitor legislation and revise regulations as necessary to ensure conformance with current law. In addition, the City will explore and pursue ADU funding annually, modify development standards and reduce fees beyond the minimum requirements of State law, prepare pre-approved plans, and provide homeowner/applicant assistance tools.</u></p> <p><u>Program HE-4.1: Partnerships with the Housing Industry</u></p> <p><u>The City has limited resources to use for the development and maintenance of affordable housing. To maximize its funding and staff resources, the City shall seek opportunities to partner with non-profit and for-profit housing developers. Specifically, the City shall proactively seek partnerships to develop affordable housing and contribute to the partnership through activities such as in-kind technical assistance, support in seeking grant and funding opportunities, and financial assistance, which may include land write-downs and assistance with on- or off-site infrastructure costs where feasible. The City will contact affordable housing organizations annually to solicit interest in development.</u></p>
<p><u>Affordable Housing Preservation</u></p>	<p><u>The loss of affordable housing may be a significant contributing factor to fair housing issues in Orange County. When subsidy contracts expire, the housing providers that often have the least economic incentive to renew their affordability restrictions are those that are located in higher opportunity areas or in areas that are gentrifying or at risk of gentrification. In Placentia, there is one subsidized low-income development that could expire in the next 10 years. The loss of these affordable units could contribute to segregation and displacement.</u></p>		<p><u>Program HE-3.5: Monitor and Preserve Affordable Housing At-Risk of Conversion to Market Rate</u></p> <p><u>The City shall continue to monitor units with affordability covenants that are eligible to expire during the next 10 years. To encourage the preservation of these “at-risk” units, the City shall coordinate with the County and non-profit housing organizations to encourage the extension and/or renewal of deed restrictions or covenants., comply with noticing requirements, provide education and assistance to tenants, assist with funding, and promptly reach out to qualified entities to preserve at-risk housing units.</u></p>

Appendix D: Affirmatively Furthering Fair Housing



Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
<p><u>Availability of Affordable Housing</u></p>	<p><u>Lack of affordable, accessible housing in a range of unit sizes may be a significant contributing factor to fair housing issues in Orange County. As discussed in connection with several other contributing factors, there is a general shortage of affordable housing in the county. This shortage has a particular effect on low-income families in which at least one member has a disability that requires accessibility features, and persons with disabilities who require the services of live-in aides.</u></p>	<p><u>High</u></p>	<p><u>All of the meaningful actions described above address this issue. In addition, the following program specifically addresses the issue of housing for persons with disabilities:</u></p> <p><u>Program HE-1.12: Development of Senior Housing</u>  <u>Seniors typically have specialized housing needs and fixed incomes that may require housing units not generally included in market rate housing. In 2020 the City Council approved entitlements for a 64-unit affordable senior housing development at 1314 N. Angelina Drive. The City shall continue to encourage the development of a wide range of housing choices for seniors through incentives (e.g., financial assistance, parking reductions, regulatory waivers). These may include independent living communities and assisted living facilities with on-site services and access to health care, nutrition, transportation and other appropriate services.</u></p> <p><u>Program HE-1.13: Development of Housing for Larger Families</u>  <u>Providing appropriately sized housing units for large families is important to improving livability, reducing instances of overcrowding and minimizing deferred maintenance issues. The City shall encourage incorporation of units with 3 or more bedrooms in for-sale and rental housing developments to accommodate the needs of larger families through activities such as technical assistance, expedited processing, and flexibility in development standards.</u></p> <p><u>Program HE-1.14: Housing for Persons with Special Needs</u>  <u>Housing to accommodate persons and families with special needs is a high priority for Placentia. In 2018 the City approved the Veteran’s Village development with 49 very-low-income units for veterans who are homeless or at risk of homelessness. The project also provides services such as vocational training, mental health counseling, job placement, etc. The City shall continue to work with non-profit housing developers, service providers and the County of Orange to encourage and support the development of housing for special needs households, including persons with developmental disabilities, through activities such as technical assistance, assistance in seeking</u></p>

**Appendix D: Affirmatively Furthering Fair Housing**



<u>Fair Housing Issue</u>	<u>Contributing Factor</u>	<u>Priority</u>	<u>Meaningful Action</u>
			<p><u>funding annually, expedited processing and flexibility in development standards.</u></p> <p><u>Program HE-2.3: Minimize Constraints on Housing for Persons with Disabilities</u></p> <p><u>The City will continue to implement the Reasonable Accommodation Ordinance, which provides relief from local regulations and permitting procedures that may have a discriminatory effect on housing for persons with disabilities. In addition, a Zoning Ordinance amendment will be processed in 2022 to update the definition of “family” consistent with State law.</u></p>



## Appendix E: Glossary

**Above Moderate-Income Household.** A household with an annual income greater than 120% of the Area Median Income (AMI) adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

**Apartment.** An apartment is one or more rooms in an apartment house or dwelling occupied or intended or designated for occupancy by one family for sleeping or living purposes and containing one kitchen.

**Assisted Housing.** Generally multi-family rental housing, but sometimes single-family ownership units, whose construction, financing, sales prices, or rents have been subsidized by federal, state, or local housing programs.

**Below-market-rate (BMR).** Any housing unit specifically priced to be sold or rented to Low- or Moderate-Income households for an amount less than the fair-market value of the unit. Both the State of California and the U.S. Department of Housing and Urban Development set standards for determining which households qualify as “Low-Income” or “Moderate-Income.” May also refer to the financing of housing at less than prevailing interest rates.

**Build-out.** That level of urban development characterized by full occupancy of all developable sites in accordance with the General Plan; the maximum level of development envisioned by the General Plan.

**Community Development Block Grant (CDBG).** A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitlement communities and by counties or the California Department of Housing and Community Development (HCD) for non-entitled jurisdictions. This grant allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.

**Condominium.** A type of ownership in which the interior space is individually owned and the balance of the property (both land and building) is owned in common by the owners of the individual units. (See “Townhouse.”)

**Covenants, Conditions, and Restrictions (CC&Rs).** A term used to describe private restrictive limitations that may be placed on property and its use, and which usually are made a condition of holding title or lease.

**Density Bonus.** The allocation of development rights that allow a parcel to accommodate additional square footage or residential units beyond the maximum for which the parcel is zoned, usually in exchange for the provision of affordable housing at the same site or at another location.



**Density, Residential.** The number of residential dwelling units per acre of land. Densities specified in the General Plan may be expressed in units per gross acre or per net developable acre.

**Developable Land.** Land that is suitable as a location for structures.

**Down Payment.** Money paid by a buyer from his own funds, as opposed to that portion of the purchase price that is financed.

**Duplex.** A detached building under single ownership that is designed for occupation as the residence of two families living independently of each other.

**Dwelling Unit (du).** A building or portion of a building containing one or more rooms, designed for or used by one family for living or sleeping purposes, and having a separate bathroom and only one kitchen or kitchenette. See Housing Unit.

**Elderly Housing.** Typically, small apartments or condominiums designed to meet the needs of persons 62 years of age and older or, if more than 150 units, persons 55 years of age and older, and restricted to occupancy by them.

**Emergency Shelter.** Temporary housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay. [*California Health and Safety Code §50801(e)*]

**Extremely Low-Income Household.** A household with an annual income equal to or less than 30% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

**Fair Market Rent.** The rent, including utility allowances, determined by the United States Department of Housing and Urban Development (HUD) for purposes of administering the Section 8 Program.

**Family.** (1) Two or more persons related by birth, marriage, or adoption [U.S. Bureau of the Census]. (2) An individual or a group of persons living together who constitute a bona fide single housekeeping unit in a dwelling unit, not including a fraternity, sorority, club, or other group of persons occupying a hotel, lodging house or institution of any kind.

**General Plan.** A comprehensive, long-term plan mandated by State Planning Law for the physical development of a city or county and any land outside its boundaries which, in its judgment, bears relation to its planning. The plan shall include seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. The plan must include a statement of development policies and a diagram or diagrams illustrating the policies.

**Goal.** A general, overall, and ultimate purpose, aim, or end toward which the City will direct effort.



**Green Building.** Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition. (US Environmental Protection Agency)

**Historic Preservation.** The preservation of historically significant structures and neighborhoods until such time as, and in order to facilitate, restoration and rehabilitation of the building(s) to a former condition.

**Historic Property.** A historic property is a structure or site that has significant historic, architectural, or cultural value.

**Household.** All those persons—related or unrelated—who occupy a single housing unit. (See “Family.”)

**Housing and Community Development Department (HCD).** The state agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of Low-and Moderate-Income households.

**Housing Element.** One of the seven state-mandated elements of a local general plan. It assesses the existing and projected housing needs of all economic segments of the community, identifies potential sites adequate to provide the amount and kind of housing needed, and contains adopted goals, policies, and implementation programs for the preservation, improvement, and development of housing.

**Housing Payment.** For ownership housing, this is defined as the mortgage payment, property taxes, insurance and utilities. For rental housing this is defined as rent and utilities.

**Housing Unit.** The place of permanent or customary abode of a person or family. A housing unit may be a single-family dwelling, a multi-family dwelling, a condominium, a modular home, a mobile home, a cooperative, or any other residential unit considered real property under state law.

**Housing and Urban Development, U.S. Department of (HUD).** A cabinet-level department of the Federal government that administers housing and community development programs.

**Implementing Policies.** The City’s statements of its commitments to consistent actions.

**Implementation.** Actions, procedures, programs, or techniques that carry out policies.

**Infill Development.** The development of new housing or other buildings on scattered vacant lots in a built-up area or on new building parcels created by permitted lot splits.

**Jobs-Housing Balance.** The existing or projected ratio of employment to housing units within a geographic area.

**Land Use Classification.** A system for classifying and designating the allowable use of properties.



**Live-Work Units.** Buildings or spaces within buildings that are used jointly for commercial and residential purposes where the residential use of the space is secondary or accessory to the primary use as a place of work.

**Low-Income Household.** A household with an annual income usually no greater than 51%-80% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

**Low-Income Housing Tax Credits.** Tax reductions provided by the Federal and state governments for investors in low-income housing.

**Manufactured Housing.** Residential structures that are constructed entirely in the factory, and which since June 15, 1976, have been regulated by the Federal Manufactured Home Construction and Safety Standards Act of 1974 under the administration of the U. S. Department of Housing and Urban Development (HUD). (See “Mobile Home” and “Modular Unit.”)

**Mixed-use.** Properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design. A “single site” may include contiguous properties.

**Moderate-Income Household.** A household with an annual income usually no greater than 81%-120% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

**Monthly Housing Expense.** Total principal, interest, taxes, and insurance paid by the borrower, or total rent and utilities paid by a tenant on a monthly basis. Used with gross income to determine affordability.

**Multiple Family Building.** A building designed and used exclusively as a dwelling by two or more households occupying separate suites.

**Ordinance.** A law or regulation set forth and adopted by a governmental authority, usually a city or county.

**Overcrowded Housing Unit.** A housing unit in which the members of the household or group are prevented from the enjoyment of privacy because of small room size and housing size. The U.S. Bureau of Census defines an overcrowded housing unit as one that is occupied by more than one person per room.

**Parcel.** A lot or tract of land.

**Persons with Disabilities.** Persons determined to have a physical impairment or mental disorder expected to be of long or indefinite duration. Many such impairments or disorders are of such a nature that a person’s ability to live independently can be improved by appropriate housing conditions.



**Planning Area.** The area directly addressed by the general plan. A city's planning area typically encompasses the city limits and potentially annexable land within its sphere of influence.

**Policy.** A specific statement of principle or of guiding actions that implies clear commitment but is not mandatory. A general direction that a governmental agency sets to follow, in order to meet its objectives before undertaking an action program.

**Poverty Level.** As used by the U.S. Census, families and unrelated individuals are classified as being above or below the poverty level based on a poverty index that provides a range of income cutoffs or "poverty thresholds" varying by size of family, number of children, and age of householder. The income cutoffs are updated each year to reflect the change in the Consumer Price Index.

**Program.** An action, activity, or strategy carried out in response to adopted policy to achieve a specific goal or objective. Policies and programs establish the "who," "how" and "when" for carrying out the "what" and "where" of goals and objectives.

**Redevelop.** To demolish existing buildings; or to increase the overall floor area existing on a property; or both; irrespective of whether a change occurs in land use.

**Regional.** Pertaining to activities or economies at a scale greater than that of a single jurisdiction, and affecting a broad geographic area.

**Regional Housing Needs Assessment.** A quantification of existing and projected housing need, by household income group, for localities within a region.

**Rehabilitation.** The repair, preservation, and/or improvement of substandard housing.

**Residential.** Land designated in the General Plan and zoning ordinance for building consisting of dwelling units. May be improved, vacant, or unimproved. (See "Dwelling Unit.")

**Residential Care Facility.** A facility that provides 24-hour care and supervision to its residents.

**Residential, Multiple Family.** Two or more dwelling units on a single site, under common ownership.

**Residential, Single-Family.** A single dwelling unit on a building site.

**Retrofit.** To add materials and/or devices to an existing building or system to improve its operation, safety, or efficiency. Buildings have been retrofitted to use solar energy and to strengthen their ability to withstand earthquakes, for example.

**Rezoning.** An amendment to the map to effect a change in the nature, density, or intensity of uses allowed in a zoning district and/or on a designated parcel or land area.

**Second Unit.** A self-contained living unit, either attached to or detached from, and in addition to, the primary residential unit on a single lot. "Granny Flat" is one type of second unit.



**Section 8 Rental Assistance Program.** A Federal (HUD) rent-subsidy program that is one of the main sources of Federal housing assistance for low-income households. The program operates by providing housing assistance payments to owners, developers, and public housing agencies to make up the difference between the “Fair Market Rent” of a unit (set by HUD) and the household’s contribution toward the rent, which is calculated at 30% of the household’s adjusted gross monthly income (GMI).

**Shared Living.** The occupancy of a dwelling unit by persons of more than one family in order to reduce housing expenses and provide social contact, mutual support, and assistance. Shared living facilities serving six or fewer persons are permitted in all residential districts by §1566.3 of the California Health and Safety Code.

**Single-family Dwelling, Attached.** A dwelling unit occupied or intended for occupancy by only one household that is structurally connected with at least one other such dwelling unit. (See “Townhouse.”)

**Single-family Dwelling, Detached.** A dwelling unit occupied or intended for occupancy by only one household that is structurally independent from any other such dwelling unit or structure intended for residential or other use. (See “Family.”)

**Single Room Occupancy (SRO).** A single room, typically 80 to 250 square feet, with a sink and closet, but which may require the occupant to share a communal bathroom, shower, and kitchen.

**Subsidize.** To assist by payment of a sum of money or by the granting to terms or favors that reduces the need for monetary expenditures. Housing subsidies may take the form of mortgage interest deductions or tax credits from Federal and/or state income taxes, sale or lease at less than market value of land to be used for the construction of housing, payments to supplement a minimum affordable rent, and the like.

**Substandard Housing.** Residential dwellings that, because of their physical condition, do not provide safe and sanitary housing.

**Supportive Housing.** Housing with no limit on length of stay, that is occupied by the target population as defined in *California Health and Safety Code* §3260(d), and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. “Target population” means adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people. [*California Health and Safety Code* §50675.14(b) and §53260(d)]

**Target Areas.** Specifically designated sections of the community where loans and grants are made to bring about a specific outcome, such as the rehabilitation of housing affordable by very-low- and low-income households.



**Tenure.** A housing unit is “owned” if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. All other occupied units are classified as “rented,” including units rented for cash rent and those occupied without payment of cash rent.

**Townhouse.** A townhouse is a dwelling unit located in a group of three (3) or more attached dwelling units with no dwelling unit located above or below another and with each dwelling unit having its own exterior entrance.

**Transitional Housing.** Shelter provide to the homeless for an extend period, often as long as 18 months, and generally integrated with other social services and counseling programs to assist in the transition to self-sufficiency through the acquisition of a stable income and permanent housing. (See “Emergency Shelter”) 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. [*California Health and Safety Code §50675.2(h)*]

**Very-Low-Income Household.** A household with an annual income usually no greater than 50% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.



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**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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December 20, 2021

Joe Lambert, Director  
Development Services Department  
City of Placentia  
401 East Chapman Avenue  
Placentia, CA 92870

Dear Joe Lambert:

**RE: City of Placentia's 6<sup>th</sup> Cycle (2021-2029) Draft Housing Element**

Thank you for submitting the City of Placentia's (City) draft housing element received for review on October 21, 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. In addition, HCD considered comments from the Campaign for Fair Housing Elements; Kennedy Commission; and People for Housing Orange County, 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.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

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.

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](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and  
[http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

HCD appreciates your efforts in the preparation of your draft element. 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 Chelsea Lee, of our staff, at [Chelsea.Lee@hcd.ca.gov](mailto:Chelsea.Lee@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager

Enclosure

## **APPENDIX CITY OF PLACENTIA**

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).)*

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).

### **B. Housing Needs, Resources, and Constraints**

1. *Affirmatively further[ing] fair housing 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).)*

The element provides a general overview of affirmatively furthering fair housing (AFFH), beginning on page 2-22, including general information on outreach and segregation and integration. However, it generally does not address this requirement. The element, among other things, must include outreach, an assessment of fair housing, analysis of the sites inventory, 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. For further guidance, please visit HCD's AFFH 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 (ELI) Households: While the element quantifies existing and projected ELI households, it must also analyze their housing needs. For example, the element should analyze tenure, cost burden and other household characteristics then examine the availability of resources to determine gaps in housing needs. To assist the analysis, see the enclosed data and sample analysis 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).)*

Overpayment: While the element includes some general information on overpayment, it must also quantify and analyze the total number of households overpaying by tenure, including lower-income households. For additional information and sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.

Housing Stock Condition: The element estimates over 200 units need rehabilitation (p. 2-8). However, the element should clarify the data sources utilized in arriving at the City's estimation. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable organizations. In addition, the element should include an estimate of the number of units in need of replacement. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/housing-stock-characteristics.shtml>.

Housing Costs: While the element identifies housing price trends and median home sales prices on page 2-10, it must also identify median rental prices to reflect current market conditions.

- 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).)*

Regional Housing Need Allocation (RHNA): The element's identified RHNA, dated March 4, 2021 and prior to HCD approval, is incorrect (p. 2-21). This RHNA does not reflect changes made to the City's RHNA and approved on July 1, 2021. For additional information, see <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1625161899>.

Sites Inventory: The sites inventory lists the existing uses for nonvacant sites. However, these descriptions are generic (e.g., residential, industrial) and should be sufficiently detailed to facilitate an analysis that the use will likely discontinue in the planning period.

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 and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. In addition, the estimate must also 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.

Suitability of Nonvacant Sites: While the element identifies nonvacant sites to accommodate the regional housing need for lower-income households, it provides no methodology or description of their potential for redevelopment. The element must 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, any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g).)

In addition, the housing element appears to rely upon nonvacant sites to accommodate more than 50 percent of the 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 regional housing need allocation.

Finally, if element utilizes sites with existing residential uses. Absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing policy has the same requirements as set forth in Government Code section 65915, subdivision (c) (3).

Sites Identified in Prior Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within

three years. The element should clarify if sites were identified in prior planning periods and if so, which sites and include a program if utilizing previously identified sites in the current planning period. For more information on program requirements, please see HCD's Housing Element Sites Inventory Guidebook at <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.

**Availability of Infrastructure:** The element describes the availability of water capacity but must also demonstrate sufficient existing or planned total sewer and dry utilities capacity to accommodate the RHNA.

For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. HCD recommends including a cover memo describing the City housing element, including RHNA, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml>.

**Environmental Constraints:** While the element generally describes a few environmental conditions within the City (pp. 3-17 to 3-20), it must also describe any known environmental constraints or other conditions on identified sites that could impact housing development in the planning period. In addition, the element notes consolidation or other factors may impact development on sites identified to accommodate housing for moderate and above moderate-income households and as a result, it should include analysis, adjustments and policies and programs to demonstrate the feasibility of these sites in the planning period.

**Affirmatively Furthering Fair Housing:** The element must demonstrate the sites inventory AFFH. For more information, see HCD's guidance at <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.

**Sites Map:** The element does not address this requirement. The element must include a general map of identified sites. For additional information, see the sites inventory analysis section of the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/inventory-of-land-suitable.shtml>.

**Electronic Sites Inventory:** For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance.

Accessory Dwelling Units (ADU): The element projects 56 ADUs over the planning period or approximately seven ADUs per year over the eight-year planning period. According to HCD records, 2 units were permitted in 2018, two were permitted in 2019, and five permitted in 2020. These trends do not support an assumption of seven ADUs per year. To support assumptions for ADUs in the planning period, the element should reconcile trends with HCD records, adjust assumptions as appropriate and include additional information such as more recent permitted units and inquiries, resources and incentives, other relevant factors and modify policies and programs as appropriate.

Zoning for a Variety of Housing Types: The element must demonstrate zoning to encourage and facilitate a variety of housing types, as follows:

- *Emergency Shelters*: The element must demonstrate the M (Manufacturing) zone still has sufficient capacity to accommodate the identified housing need for emergency shelters. For example, the element should identify acreage, typical parcels sizes, whether the sites are nonvacant, and the potential capacity for adaptive reuse. In addition, Municipal Code Section 23.47.130, subdivision (5) appears to constrain the development of emergency shelters by imposing spacing requirements of at least 300 feet from any residential use or residentially zoned property, public or private park, or school. The element should analyze spacing requirements for as potential constraints on emergency shelter and add a program as necessary. For additional information and a sample analysis, see the Building Blocks at [http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb2\\_memo050708.pdf](http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb2_memo050708.pdf).
- *Employee Housing*: 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. The element should demonstrate consistency with these requirements and include programs if necessary.
- *Manufactured Housing*: The element did not address this requirement. The element must demonstrate zoning permits manufactured housing in compliance with Government Code section 65852.3, similar to single family uses.
- *Permanent Supportive Housing*: Supportive housing 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 65651. The element must demonstrate compliance with this requirement and include programs as appropriate.
- *Accessory Dwelling Units*: This housing type appears to be excluded from several residential zones, inconsistent with state law. The element should evaluate compliance with state ADU law and include programs as appropriate.

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).)*

Land Use Controls: The element must also analyze all relevant land use controls impacts as potential constraints on a variety of housing types (e.g., multifamily rental housing, mobilehomes, transitional housing). The analysis must also evaluate the cumulative impacts of land use controls on the cost and supply of housing, including the ability to achieve maximum densities and cost and supply of housing. Specifically, the analysis should address multifamily height and parking requirements, including requirements for garages and impacts on one-bedroom and studio units. In addition, the analysis should identify and analyze the standards for the Old Town (OT) and Transit Oriented Development (TOD) zones, including all subdistricts. The element should include programs to address and remove or mitigate identified constraints.

Development Plan Review (DPR): The element notes multifamily uses are subject to a DPR by the Planning Commission but should also analyze this process. The analysis should address typical number of hearings, approval findings and timing and evaluate impacts on housing cost, timing, supply and approval certainty.

Fees and Exactions: While the element includes a summary of total fees for typical single family and multifamily, it should also list and analyze planning fees (e.g., DPR, rezone, general plan amendment, variance, conditional use permit).

Housing for Persons with Disabilities: The element states the City has a reasonable accommodation procedure (p. 3-11), but it should also analyze the procedure for potential constraints. The analysis should address the process, application requirements and approval findings. In addition, the element indicates group homes for six or fewer persons are permitted in residential zones but should also address whether group homes for seven or more persons are permitted, how and where they permitted and include programs as appropriate. For additional information and a sample program and ordinance, see the Building Blocks at [http://www.hcd.ca.gov/hpd/housing\\_element2/PRO\\_mitigate.php](http://www.hcd.ca.gov/hpd/housing_element2/PRO_mitigate.php).

Codes and Enforcement: Although the element mentions it follows the California Building Code, it also indicates it processes local amendments to “further define requirements based on the unique local conditions” (p. 3-15). The element must describe the City’s building and zoning code enforcement processes and procedures and identify and analyze any local amendments to the building code for impact as potential constraints on housing cost and supply. For additional information and a sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml>.

Local Ordinances: The element must specifically analyze locally adopted ordinances such as inclusionary ordinances or short-term rental ordinances that directly impact the cost and supply of residential development. The analysis should demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters.

SB 35 Streamlined Ministerial Approval Process: The element must identify and analyze whether the City has written procedures to implement the SB 35 Streamlined Ministerial Approval Process and include a program if necessary.

Zoning, Development Standards and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards and fees for each parcel on the jurisdictions' website and add a program to address these requirements if necessary.

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).)*

Identified Densities and Approval Times: The element did not address these requirements. The element must address requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for housing development and submittal of application for building permits. The analysis must address any hinderances on housing development and programs should be added as appropriate.

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).)*

While the element quantifies several of the City's special needs populations, it must analyze the special housing needs of each of these groups. For a complete analysis of each population group, the element should discuss challenges faced by the population, the existing resources to meet those needs (availability of senior housing units, percent of large units, percent of deed restricted units, etc.), an assessment of any gaps in resources and proposed policies, programs, and funding to help address those gaps.

In addition, the element indicates there are approximately 136 total jobs and 80 full-time year-round jobs in the agricultural industry within the City (p. 2-18); however, the analysis does not consider the regional context. Farmworkers from the broader area and those employed seasonally may have housing needs that are not currently reflected in the analysis. As a result, the element should at least acknowledge the housing needs of farmworkers at a county level (e.g. USDA county-level farmworker data) and include programs as appropriate.

### **C. Housing Programs**

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To address the program requirements of Government Code section 65583, subdivisions (c) (1-6), and to facilitate implementation, several programs should be revised to include more discrete timing, rather than “ongoing” or in “process.” Examples include actions under Programs 1.8 (Adequate Sites for Housing Development), 1.14 (Housing for Persons with Special Needs), 1.15 (Transit-Oriented Development), 3.1 (Community Based Neighborhood Rehabilitation), 3.3 (Placentia Rehabilitation Grant Program), 4.1 (Partnerships with the Housing Industry), and 4.2 (Participation in Continuum of Care Forum). In addition, many programs do not contain specific and clear commitments to complete a deliverable or action that will have a tangible and beneficial impact in the planning period and, as a result, should be revised. For example, actions under Programs 1.1 (Manufactured Housing and Mobile Homes), 1.2 (Locate Housing Near Transportation, Employment and Services), 1.3 (Pursue County, State, and Federal Housing Funds), and 1.15 (Transit-Oriented Development) commit to “preserve,” “encourage,” and “increase,” which does not result in any tangible outcomes.

2. *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.

Shortfall of Sites: The element describes a shortfall of sites, particularly for the moderate and above moderate income RHNA, and indicates rezoning will occur to accommodate the RHNA. While the element includes Program 1.8 (Adequate Sites for Housing Development), it must specifically commit to acreage, allowable densities, and anticipated units. In addition, if necessary, to accommodate the housing needs of lower-income households, the program should specifically commit to rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i).

Sites Identified in Multiple Planning Periods: If identifying sites utilized in prior planning periods, the element must include a program for vacant sites identified in two of more consecutive planning periods' housing elements or nonvacant sites identified in a prior housing element, that are currently identified to accommodate housing for lower-income households. The program must be implemented within the first three years of the planning period and commit to zoning that will meet the density requirements for housing for lower-income households and allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower-income households. (Gov. Code, § 65583.2, subd. (c).)

Replacement Provisions: The element should include a policy replacing units on sites with existing residential uses pursuant to Government Code section 65583.2, subdivision (g).

Program 1.5 (Infrastructure Provision): Because the element indicates that the City's future housing needs would place greater demands on its sewage infrastructure (pg. 3-20), the program could identify additional funding sources, such as CDBG, IBank, and USDA funds, to address infrastructure constraints and prioritize identified areas with infrastructure constraints for improvement. For a list of funding opportunities, see HCD's Financial Assistance Program Directory at [http://hcd.ca.gov/fa/LG\\_program\\_directory.pdf](http://hcd.ca.gov/fa/LG_program_directory.pdf). Other resources include the California Financing Coordinating Committee (CFCC).

3. *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).)*

While the element includes Programs 1.3 (Pursue Funding), 1.8 (Adequate Sites) and 1.14 (Housing for Persons with Special Needs), these programs should be revised with specific and proactive outreach efforts with developers of affordable housing on an annual basis.

4. *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.

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 outcome of that analysis, the element must add or modify programs. For more information, please see HCD's guidance at <https://www.hcd.ca.gov/community-development/affh/index.shtm>.

6. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)*

The element identifies the Imperial Villas project, with 58 units at-risk, of converting to market-rate uses in the planning period. Program 3.5 (Monitoring At-Risk Units) should be revised to comply with noticing requirements, provide education and assistance to tenants, assist with funding, and promptly reach out to qualified entities to preserve at-risk housing units.

7. *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).)*

As indicated in Finding B4, the element may need to include a program to amend the City's ADU ordinance. In addition, programs must be expanded to include incentives to promote the creation and affordability of ADUs. Examples include exploring and pursuing funding, modifying development standards and reducing fees beyond state law, increasing awareness, pre-approved plans and homeowner/applicant assistance tools. Finally, given the City's assumptions for ADUs exceed recent trends, the element should include a program to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time period (e.g., 6 months).

#### **D. 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).)*

Although the element includes a general summary of the public participation process (p. 1-4 and in Appendix A), HCD has received public comments from groups concerned that the City has not demonstrated diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element should address public comments received, could describe the efforts to circulate the housing element among low- and moderate-income households and organizations that represent them and involve such groups and persons in the element throughout the process. In addition, the element should also summarize the public comments and describe how they were considered and incorporated into the 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, it is unclear when the City made the element available to the public prior to submitting to HCD. The availability of the document to the public and opportunity for public comment 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 revising 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.

## Attachment 4

### HCD Comments and Responses City of Placentia

HCD Comment (Letter of 12/20/2021)	Revised Draft Housing Element Page No.	Response/Revision
A. Review and revision	Appendix C	Appendix C has been revised to provide additional explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations.
B.1 Affirmatively furthering fair housing	Appendix D 4-11	The element has been revised to include additional analysis of fair housing. In addition, Program 2.1 has been revised to describe additional actions the City will take to affirmatively further fair housing.
B.2 Extremely-low-income households	2-5/6	The element has been revised to provide additional analysis of ELI households, including cost burden and severe cost burden by tenure.
B.3 Household characteristics	2-5/6	<u>Overpayment</u> . The analysis contained in the draft element (Table II-7) included overpayment for lower-income households by income category. This analysis has been expanded to also quantify overpaying households by tenure (i.e., renter and owner).
	2-9	<u>Housing stock conditions</u> . The element has been revised to include data sources and an estimate of the number of housing units in need of replacement.
	2-11	<u>Median rent</u> . The element has been revised to include the estimated average rent in the city.
B.4 Sites inventory	2-21	<u>RHNA</u> : Table 2-3 has been revised to reflect RHNA modifications approved by SCAG on 7/1/2021.
	Appendix B	<u>Sites inventory</u> . The inventory has been revised to include additional information regarding existing uses.
	Appendix B	<u>Realistic Capacity</u> . Additional analysis of the realistic capacity of the sites inventory has been provided.

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	Appendix B 4-4	<u>Suitability of nonvacant sites.</u> Additional analysis has been provided regarding the potential capacity for additional housing on nonvacant sites. In addition, Program 1.8 has been revised to include a replacement requirement pursuant to Gov. Code § 65583.2(g)(3) if this property is rezoned to accommodate a RHNA shortfall and any existing residential units in this project would be demolished.
	Appendix B 4-4	<u>Sites identified in a prior planning period.</u> The sites inventory has been expanded to identify sites used in a prior planning period. In addition, Program 1.8 has been revised in conformance with State law.
	3-20	<u>Infrastructure:</u> The original draft element included analysis of sewer and dry utilities.
	3-17 to 20	<u>Environmental Constraints:</u> The original draft element included analysis of environmental constraints, including seismic, flooding, hazardous waste, transportation of hazardous materials, fire hazards and noise. The analysis has been expanded to clarify that these potential constraints are not expected to preclude development commensurate with the City's assigned share of regional housing needs.
	Appendix D	<u>AFFH.</u> Analysis of how the sites inventory addresses fair housing goals has been provided in Appendix D.
	Appendix B	<u>Sites map.</u> Maps showing the locations of parcels in the sites inventory have been added in Appendix B.
		<u>Electronic sites inventory.</u> An electronic sites inventory is being submitted with the adopted element as required by State law.
	B-3	<u>ADUs.</u> The analysis of ADU production has been expanded to address this comment.
B.4 Zoning for a Variety of Housing Types	3-32	<u>Emergency Shelters:</u> The element has been revised to provide additional analysis of the City's available sites and development standards for emergency shelters. In addition, Program 1.4 has been revised to include an amendment to emergency shelter parking requirements consistent with AB 139 (Government Code sec 65583(a)(4)(A)).

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	3-15 4-4	<u>Employee housing</u> : The element has been revised to demonstrate consistency with the Employee Housing Act (Health and Safety Code, §17000 et seq.) and Program 1.4 has been revised to include a Code amendment consistent with current law.
	3-15	<u>Manufactured housing</u> : The element has been revised to demonstrate consistency with Government Code section 65852.3.
	3-14 4-3	<u>Permanent supportive housing</u> . The element has been revised to demonstrate consistency with Government Code section 65651.
	3-6 3-34 4-10	<u>ADUs</u> . The element has been revised to reflect current City ADU regulations and Program 1.19 has been revised to include additional measures to encourage ADU production.
B.5 Governmental constraints	3-7 to 24 4-10	<u>Land use controls</u> . The element has been revised to include additional analysis of the cumulative impacts of land use controls on the cost and supply of housing, including the ability to achieve maximum densities. The analysis includes multifamily height and parking requirements, including requirements for garages and impacts on 1-bedroom and studio units, as well as development standards for the Old Town (OT) and Transit Oriented Development (TOD) zones, including all subdistricts. In addition, Program 1.17 has been revised to include a Code amendment to reduce required parking for studio and 1-bedroom units in the R-3 district to 1 space in either a garage or a carport.
	3-36 to 39	<u>Development plan review</u> : The element has been revised to provide additional analysis of the DPR process and approval procedures.
	3-36	<u>Fees</u> . The element has been revised to include all development fees for typical residential projects. It should be recognized that some fees (e.g., General Plan amendment, specific plan, zone change) are not required unless an applicant is seeking to change land use regulations. Therefore, they are not relevant to the analysis of typical fees.
	3-27 to 29	<u>Housing for persons with disabilities</u> . The element has been revised to provide additional information regarding the reasonable accommodation process and the recent approval of a use permit for a large residential care facility.

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	3-35/36	<u>Codes and enforcement.</u> The element has been revised to provide additional analysis of codes and enforcement, including local amendments to the Building Code and the enforcement process.
	3-35	<u>Other Local Ordinances:</u> The element has been revised to analyze any locally adopted ordinances that directly impacts the cost and supply or residential development, including growth limits, inclusionary requirements and short-term rentals.
	4-4	<u>SB 35 Streamlined Ministerial Approval Process.</u> Program 1.6 has been revised to include preparation of written procedures for the SB 35 Streamlined Ministerial Approval Process.
	4-4	<u>Zoning, Development Standards, and Fees.</u> Program 1.6 has been revised to address new transparency laws requiring fees and zoning requirements to be provided on a jurisdiction's website.
B.6 Non-governmental constraints	3-45	<u>Approval Time and Requests Lesser Densities:</u> The element has been revised to include additional analysis of requests to develop housing at densities below those identified, the length of time between receiving approval for a housing development and submittal of an application for building permits.
B.7 Special housing needs	2-12 to 19	The housing needs assessment has been expanded to provide additional analysis of special housing needs.
C.1 Programs that set forth a schedule of actions during the planning period	Chapter 4	Housing programs have been revised to include more specific timing and description of the City's role in implementation.
C.2 Programs to make sites available during the planning period	Chapter 4	<p><u>Shortfall of sites.</u> Program 1.8 (Adequate Sites for Housing Development) has been revised to include specific commitments for rezoning including acreage, allowable densities, and anticipated units, as well as compliance with Government Code section 65583.2, subdivisions (h) and (i).</p> <p><u>Sites identified in multiple planning periods.</u> Program 1.8 (Adequate Sites for Housing Development) has also been revised to include a requirement that for any non-vacant sites identified in Appendix B that were listed in a previous Housing Element sites inventory, or vacant sites that were listed in two previous consecutive inventories, residential development will be allowed by-right when a housing project provides at least 20% of the units affordable to</p>

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		<p>lower-income households in compliance with Government Code Sec. 65583.2(c).</p> <p><u>Replacement Provisions.</u> Program 1.8 (Adequate Sites for Housing Development) has also been revised to include a requirement that development on any site listed in Appendix B that proposes to demolish existing housing units shall be subject to a policy requiring the replacement of affordable units as a condition of any development on the site pursuant to Government Code Sec. 65583.2(g)(3). Replacement requirements shall be consistent with those set forth in Section 65915(c)(3).</p> <p><u>Infrastructure.</u> Program 1.5 has been revised to include annual review of infrastructure grant opportunities and application submittal based on eligibility.</p>
C.3 Programs to assist development of housing for extremely-low-income households	Chapter 4	Programs 1.3 (Pursue Funding), 1.8 (Adequate Sites) and 1.14 (Housing for Persons with Special Needs) have been revised to include specific and proactive outreach efforts with developers of affordable housing on an annual basis.
C.4 Programs to remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing		This comment is addressed in B5 and B6 above.
C.5 Affirmatively furthering fair housing	Appendix D 4-11	Additional analysis of AFFH issues is provided in Appendix D and Program 2.1 has been expanded to include additional actions the City will take to further fair housing.
C.6 Programs to preserve low-income housing	4-14	Program 3.5 (Monitoring At-Risk Units) has been revised to include compliance with noticing requirements, provide education and assistance to tenants, assist with funding, and promptly reach out to qualified entities to preserve at-risk housing units.
C.7 ADUs	4-10	Program 1.19 (Accessory Dwelling Units) has been revised to include additional incentives to promote the creation and affordability of ADUs.

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D. Public Participation	Appendix A	The element has been revised to provide additional information regarding the public participation process.