



# **FY 2019-20 ANNUAL ACTION PLAN County of Orange**

The Fifth Annual Action Plan  
Under the Urban County Consolidated Plan  
for Fiscal Years 2015-19

OC Housing & Community Development  
Julia Bidwell, Director  
1300 S Grand, Building B  
Santa Ana, CA 92705

## **Urban County Program Participants**

City of Brea  
City of Cypress  
City of Dana Point  
City of Laguna Beach  
OC Unincorporated Areas

City of Laguna Hills  
City of Laguna Woods  
City of La Palma  
City of Los Alamitos

City of Seal Beach  
City of Stanton  
City of Villa Park

### **Metro Cities**

City of Placentia

City of Yorba Linda

## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

The County of Orange is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles.

The Fiscal Year (FY) 2015-19 Consolidated Plan (ConPlan) for the Urban County of Orange is the planning document for Community Planning and Development (CPD) funds - Community Development Block Grant (CDBG), HOME investment Partnership, and Emergency Solutions Grant (ESG) funds. The Plan identifies the housing and community development needs in the Urban County and sets forth a strategic plan for addressing the identified needs. This Action Plan covers the fifth year of the FY 2015-19 ConPlan, beginning July 1, 2019 through June 30, 2020. The Action Plan will identify anticipated levels of funding for the program year, describes the geographic areas in which assistance will be provided, and the rationale used.

The “Urban County” of Orange is comprised of 11 cities with populations under 50,000 (participating cities), two “Metro” cities – Placentia, and Yorba Linda – with populations over 50,000, and the unincorporated areas of Orange County. The 11 participating cities include Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Seal Beach, Stanton, and Villa Park. With populations over 50,000, Placentia, and Yorba Linda are eligible to participate in the CPD programs as entitlement jurisdictions and receive funding directly from HUD. However, these cities have elected to join the Urban County for the overall implementation of these programs.

#### **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Urban County of Orange incorporated outcome measures for activities in accordance with the Federal Register Notice which require the following Performance Measure Objectives/Outcomes to be associated with each activity funded:

General Objective Categories- Activities will meet one of the following:

- Decent Housing (DH)
- A Suitable Living Environment (SL)
- Economic Opportunity (EO) General

Outcome Categories- Activities will meet one of the following:

- Availability/Accessibility (1)
- Affordability (2)
- Sustainability (3)

In addition to national objectives and performance outcomes, the County must weigh and balance the input from different groups and assign funding priorities that best bridge the gaps in the County's service delivery system. While other goals the County has set are also important, for the purposes of the Consolidated Plan, only those which are anticipated to be funded with CPD funding programs (CDBG, HOME, and ESG) during the five-year planning cycle are indicated to be high priorities. The County utilizes other funding sources to meet goals that are not considered high priority in the Consolidated Plan. The County established priorities for allocating CPD funds based on a number of criteria, including:

- Urgency of needs
- Cost efficiency
- Eligibility of activities/programs
- Availability of other funding sources to address specific needs
- Funding program limitations
- Capacity and authority for implementing actions
- Consistency with countywide goals, policies, and efforts

Needs which have been determined to be a High Priority level will receive funding during the Five-Year Consolidated Plan. The priorities for the FY 2015-2019 Consolidated Plan, established in consultation with residents and community groups, include the following:

#### High Priority

- Expand and preserve the supply of affordable housing to create housing opportunities for low- and moderate-income households and homeless individuals and families
- Strengthen, preserve, and enhance the physical character and quality of life in Orange County's low- and moderate-income neighborhoods, including the housing stock and public infrastructure and facilities.
- Continue to build the capacity of residents to empower themselves and help strengthen their community, through the funding of needed public services for seniors, the homeless, and those at risk of homelessness.
- Planning and administration.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

OC Housing and Community Development measures productivity and program impact in accordance with HUD Notices. Besides regular site visits to provide technical assistance to subrecipients, all projects/programs funded by OC Housing and Community Development are officially monitored at least two times per fiscal year, which involves the following: performance, compliance, drawdown timeliness and exit monitoring.

A detailed summary report of prior year uses and performance is specified in the Consolidated Annual Performance and Evaluation Report (CAPER). As reported in the CAPER for FY 2017-18, the Urban County:

- A total of seventeen (17) public facilities & improvements projects were underway in FY 2017-18, of those, eight (8) were completed including six (6) extended project from FY 2016-17 and nine (9) are still underway. These projects included ADA accessibility improvements, alleys, curbs/gutters, sidewalks, senior center and community center and year-round emergency shelter improvements. A total of \$1,281,230 was expended for these projects.
- Nine (9) housing rehabilitations projects were underway and five (5) were completed expending a total of \$552,230.
- A total of seven (7) public service projects were undertaken and completed in program year 2017-18. Public services included senior services, health/ mental health services, employment and educational services, homeless shelters and programs, childcare services and youth services. A total of \$480,199 was expended.
- One (1) project, administration was under taken to affirmatively further fair housing; a total of \$50,000 was expended.

The limited resources of the Consolidated Plan/Action Plan are not sufficient to address all of the needs of low- and moderate-income and special needs residents in the Urban County. However, the Urban County overall has been successful in implementing its public improvement, housing, and community services projects to meet the objectives established in the Consolidated Plan. Overall, the activities have been very successful and in some cases have exceeded expectations. The County will continue to proceed in meeting these needs through the FY 2015-19 Consolidated Plan and Annual Action Plans.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The Citizen Participation Plan provides a framework and process by which the County's consolidated planning efforts comply with the citizen participation requirements published by the U.S. Department of

Housing and Urban Development (HUD). The Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations 24CFR Part 91.105.

The requirements for citizen participation do not restrict the responsibility or authority of the County of Orange from the development or execution of its Consolidated Plan. The County of Orange is entitled to receive annual grant funding from the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and the Emergency Shelter Grant (ESG) programs. It is the policy of Orange County to ensure adequate citizen involvement, with particular emphasis on participation by low- and moderate-income persons, in the planning, implementation, and evaluation of its housing and community development programs. This plan covers the Urban County of Orange comprised of Participating cities with populations under 50,000 (participating cities), cities with a population over 50,000 that elect to participate in the urban county (metropolitan city) and the unincorporated areas of Orange County. The County of Orange is the lead agency in developing the Citizen Participation Plan.

It is the policy of the County to follow its Citizen Participation Plan and to encourage and facilitate a participation (residents, service providers, government agencies, and others) in the development of all Community Planning and Development (CPD) required consolidated planning documents including the Five-Year Consolidated Plan, Annual Action Plans, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER).

The primary purpose of the participation will be in needs identification, priority setting, funding allocations, and program recommendations related to the consolidated planning process. The County shall provide for and encourage citizen participation with particular emphasis on low- and moderate-income persons; persons residing in predominantly low -and moderate-income neighborhoods or slum and blighted areas; and persons residing in areas where the use of CDBG funds is being proposed.

The primary purpose of the CPD programs covered by this Citizen Participation Plan is to improve communities by providing decent housing, a suitable living environment and growing economic opportunities. The County encourages the participation of all its citizens.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No comments were received during the public review period. The County invites and accepts all comments.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

No comments were received during the public review period. The County invites and accepts all comments.

**7. Summary**

See discussion above.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	ORANGE COUNTY	OC Community Resources
HOME Administrator	ORANGE COUNTY	OC Community Resources
ESG Administrator	ORANGE COUNTY	OC Community Resources

**Table 1 – Responsible Agencies**

### Narrative (optional)

OC Housing and Community Development, a Division of OC Community Resources, administers the Urban County's CDBG, HOME, and ESG programs.

### Consolidated Plan Public Contact Information

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

As part of the Consolidated Plan development, the Urban County of Orange undertook an extensive outreach program to consult and coordinate nonprofit agencies, affordable housing providers, and government agencies regarding the needs of the low- and moderate-income community. The outreach program was summarized in the Executive Summary and Citizen Participation sections of this Consolidated Plan. Comments received and results of the survey were summarized in Appendix A to the Consolidated Plan.

### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

To outreach to various agencies and organizations, the Urban County compiled an outreach list consisting of 311 agencies, including:

- Nonprofit service providers that cater to the needs of low- and moderate-income households and persons with special needs, including persons with disabilities;
- Affordable housing providers;
- Housing advocates;
- Housing professionals;
- Public agencies (such as school districts, health services, public works);
- Economic development and employment organizations; and
- Community and neighborhood groups.

These agencies were mailed notices of the Urban County’s Consolidated Plan process and public meetings and specific agencies were also contacted to obtain data in preparation of the Consolidated Plan. For example, the State Developmental Services Department and State Social Services Department were contacted to obtain data and housing resources for persons with disabilities.

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

Leadership and coordination of Orange County’s Continuum of Care (CoC) planning process is the responsibility of OC Homeless, Housing and Community Development with the Homeless Services section as lead. This group serves as the regional convener of the annual CoC planning process and as a catalyst for the involvement of the public and private agencies that make up the regional homeless



system of care. Homeless Services provides support to the CoC governing body and routinely aligns funding available to address the needs of the homeless.

Also, the Coordinated Entry System (CES), a process to help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner, has been developed with input from homeless providers in the County and continues to evolve with input from the CoC through the CES committee and various subcommittees. In 2016, Orange County received a CoC Grant for the implementation of the CES system. The County of Orange, Homeless Services section is currently the CoC designated lead for CES. 2-1-1 Orange County is the CoC's HMIS lead.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

As the Continuum of Care lead agency, the County of Orange Homeless Services collaborates with ESG recipient jurisdictions in the region (i.e. Anaheim, Garden Grove and Santa Ana) to discuss new ESG regulations and to plan for the allocation of ESG funds through the following ways:

- Coordination across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools;
- Compliance with new eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.). Support of federal and local goals for priority populations;
- Allow for variations in the program design that responds to the needs and resources of the jurisdiction; and

In particular, to ensure that funds are leveraged to create maximum impact, the ESG recipient cities have created a single Request for Proposal (RFP) to select eligible organizations that provide homeless prevention and rapid rehousing services, street outreach, emergency shelters and transitional housing facilities for various homeless populations. The collaborative effort is intended to minimize duplication of efforts and to ensure funds are leveraged to create maximum impact. The collaborative is also looking at further options for leveraging of resources including joint monitoring and coordinated reporting requirements.

The County of Orange requires all public service projects and activities providing services to homeless individuals and/or families to actively participate in the Homeless Management Information System (HMIS). The Continuum of care also prioritizes the strengthening of data collection and participation across the system of care for homeless individuals and families.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

Table 2 – Agencies, groups, organizations who participated

1	<b>Agency/Group/Organization</b>	Abrazar, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Senior Transportation Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Non-Profit was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans.
2	<b>Agency/Group/Organization</b>	CITY OF BREA
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities & Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.

3	<b>Agency/Group/Organization</b>	CITY OF CYPRESS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Pulbic Facilities & Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
4	<b>Agency/Group/Organization</b>	CITY OF LAGUNA BEACH
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
5	<b>Agency/Group/Organization</b>	CITY OF LAGUNA HILLS
	<b>Agency/Group/Organization Type</b>	Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
6	<b>Agency/Group/Organization</b>	City of La Palma
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
7	<b>Agency/Group/Organization</b>	CITY OF LAGUNA WOODS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
8	<b>Agency/Group/Organization</b>	CITY OF LOS ALAMITOS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
9	<b>Agency/Group/Organization</b>	CITY OF SEAL BEACH
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.

10	<b>Agency/Group/Organization</b>	FAIR HOUSING COUNCIL OF OC
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-homeless Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A range of "no-cost" fair housing services provided to eligible clientele throughout the County's Urban County program areas that are victimized and affected by illegal housing practices were evaluated and have been included in the document.
11	<b>Agency/Group/Organization</b>	Orange County Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-homeless Other government - County

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Orange County Housing Authority was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans.
12	<b>Agency/Group/Organization</b>	CITY OF PLACENTIA
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
13	<b>Agency/Group/Organization</b>	City of Dana Point
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
14	<b>Agency/Group/Organization</b>	City of Villa Park
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
15	<b>Agency/Group/Organization</b>	CITY OF STANTON
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.

16	<b>Agency/Group/Organization</b>	Workforce Investment Board
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Victims of Domestic Violence Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In collaboration with the County's Workforce Investment Board (OCWIB), the County will continue to offer outreach and training to poverty level families and individuals. Through the CoC system, the County will work with the OCWIB job-training providers to ensure that low- and moderate-income persons are trained with employable skills with the potential to earn higher wages.

### Identify any Agency Types not consulted and provide rationale for not consulting

The Urban County contacted all participating cities and published on County's website for public review.

### Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	OC Community Resources	Potential funding allocations to address homeless needs will complement the CoC Strategy.

Table 3 – Other local / regional / federal planning efforts

### Narrative (optional)

**AP-12 Participation – 91.105, 91.200(c)****1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

Citizen participation is one of the most important components of the Consolidated Plan process. To solicit public input during the development of the Consolidated Plan, the Urban County conducted four Community Workshops and three Focus Group Workshops for local housing and services providers. The Urban County also administered a Housing and Community Development Needs Survey.

**Public Hearing:** A Public Hearing was held on December 4, 2018 before the Board of Supervisor for the adoption of the FY 2019-20 Funding Allocation Policy & Process and the adoption of the FY 2019-20 Annual Action Plan was approved on June 4, 2019.

**Public Review of Draft Documents:** A 30-day public review was held from October 5, 2018 through November 5, 2018 for the FY 2019-20 Funding Allocation Policy and Process and on February 8, 2019 to March 12, 2019 for the FY 2019-20 Annual Action Plan. The final Consolidated Plan, Annual Action Plans, amendments to the Plan, Funding Allocation Policy & Process and annual performance reports are available for five years at the County Government Offices.

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish and Vietnamese</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Public Notices and FY 2019-20 Funding Allocation Policy and Process and FY 2019-20 Annual Action Plan was posted on the County's website for public review.</p>	<p>No comments were received on the FY 2019-20 Funding Allocation Policy &amp; Process. The FY 2019-20 Annual Action Plan received no comments during the public review period.</p>	<p>The County invites and accepts all comments.</p>	<p><a href="http://occommunityservices.org/hcd/community/">http://occommunityservices.org/hcd/community/</a></p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish and Vietnamese</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Public notices were published in the OC Register, Unidos (Spanish) and Nguoi Viet (Vietnamese) for FY 2019-20 Funding Allocation Policy &amp; Process on October 5, 2018. FY 2019-20 Annual Action Plan was published on February 8, 2019 in the OC Register, Unidos (Spanish), Nguoi Viet (Vietnamese).</p>	<p>No comments were received on the FY 2018-19 Funding Allocation Policy &amp; Process. The FY 2018-19 Annual Action Plan received no comments during the public review period.</p>	<p>The County invites and accepts all comments.</p>	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>A public hearing was held at the Orange County Board of Supervisors on December 4, 2018 for the FY 2019-20 Funding Allocation Policy &amp; Process outlining the proposed funding process and policies for the distribution of Federal funds and is current schedule on April 23, 2019 for the adoption of the FY 2019-20 Annual Action Plan.</p>	<p>No comments were received on the FY 2019-20 Funding Allocation Policy and Process. No comments were received during the public hearing.</p>	<p>The County invites and accepts all comments.</p>	

Table 4 – Citizen Participation Outreach

## Expected Resources

### **AP-15 Expected Resources – 91.220(c)(1,2)**

#### **Introduction**

A number of housing and community development resources are currently available in the Urban County area. They include:

Community Development Block Grant (CDBG) funds

HOME Investment Partnership Program (HOME) funds

Emergency Solutions grant (ESG) funds

State Emergency Solutions grant (ESG) funds

General funds

HUD Housing Choice Voucher Program (through Orange County Housing Authority)

Workforce Innovation and Opportunity Act (through the County Community Investment Division)

California Housing Finance Agency funds (CALHFA) (multiple housing programs)

State Housing and Community Development (HCD) housing funds (multiple housing programs)

State transportation funds

Mental Health Services Act/Special Needs Housing Program (SNHP)

## State Housing and Disability Advocacy Program (HDAP)

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,182,873	153,000	178,306	3,514,179	0	The estimated amount of CDBG funds available over the planning period is based on projected allocations for FY 2019, estimated program income and funds carried over from prior years. This amount does not include amounts leveraged from sub-recipients.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	955,126	289,662	0	1,244,788	0	The estimated amount of HOME funds available over the planning period is based on projected allocations for FY 2019 and estimated program income, excluding funds carried over from prior years.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	220,824	0	0	220,824	0	The estimated amount of ESG funds available over the planning period is based on projected allocations for FY 2019, excluding funds carried over from prior years.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

A number of housing and community development resources are currently available in the Urban County area. They include:

- Community Development Block Grant (CDBG) funds
- HOME Investment Partnerships Program (HOME) funds
- Emergency Solutions Grant (ESG) funds
- State Emergency Solutions (ESG) funds

- General funds
- HUD Housing Choice Voucher Program (through the Orange County Housing Authority)
- Workforce Innovation and Opportunity Act (through the County Community Investment Division)
- California Housing Finance Agency funds (CalHFA) (multiple housing programs)
- State Housing and Community Development (HCD) housing funds (multiple housing programs)
- State transportation funds
- Mental Health Services Act/Special Needs Housing Program (SNHP)
- State Housing and Disability Advocacy Program (HDAP)

For CDBG Public Facilities and Improvements Projects, Subrecipients are required to match funds if the project funding amount requested is over \$150,000, with a maximum request of \$350,000, the Subrecipient is required to match 20% of the total amount requested. For those project up to \$150,000, no match funding is required.

HOME funds are matched through leveraged funding in affordable housing projects. ESG funds are matched through leverage of local resources for shelter services and operation.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

In 2015, the Orange County Board of Supervisors approved the acquisition and rehabilitation of an emergency shelter site located at 1000 N. Kraemer Place, Anaheim. Multi-year Federal, State and local funding was utilized to rehabilitate this site for a year round emergency shelter and multi-service center for homeless families and individuals in Orange County.

The County of Orange completed improvements to the Kraemer property and was named Bridges at Kraemer. The facility is designed to provide safe shelter, basic needs, and access to support to move individuals and families out of homelessness and into permanent housing opportunities.

The County has also funded additional homeless emergency shelters to meet the growing demand. In 2019, the County acquired a new shelter site located in Santa Ana. The site will house approximately 400 individuals experiencing homelessness. The rehabilitation and selection of the operator is anticipated to be completed by 2020.

The Year Round Emergency Shelter Program and Multi-Service Center should not be regarded as a singular program(s) but should provide support to the entire Orange County Continuum of Care (CoC) helping to move the system towards higher a level of system performance, a reduction in the number of persons who experience homelessness in our community and an increase in access to housing opportunities for chronically homeless individuals utilizing Year Round Emergency Shelter Program services.

**Discussion**

See discussion above.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
<b>1</b>	Expand Affordable Housing Opportunities	2015	2019	Affordable Housing		Expand Affordable Housing Opportunities	CDBG: \$716,533 HOME: \$1,122,943	Facade treatment/business building rehabilitation: 1 Business Rental units constructed: 20 Household Housing Unit Homeowner Housing Rehabilitated: 86 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted
<b>2</b>	Enhance Quality of Life	2015	2019	Affordable Housing Non-Housing Community Development		Enhance Quality of Life	CDBG: \$1,632,800	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 88930 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Public Services	2015	2019	Homeless Non-Homeless Special Needs		Public Services	CDBG: \$497,672 ESG: \$204,262	Public service activities other than Low/Moderate Income Housing Benefit: 3615 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 8 Households Assisted Homeless Person Overnight Shelter: 1117 Persons Assisted
4	Planning and Administration	2015	2019	Administration			CDBG: \$667,174 HOME: \$121,845 ESG: \$16,561	

Table 6 – Goals Summary

### Goal Descriptions

1	Goal Name	Expand Affordable Housing Opportunities
	Goal Description	
2	Goal Name	Enhance Quality of Life
	Goal Description	
3	Goal Name	Public Services
	Goal Description	

4	Goal Name	Planning and Administration
	Goal Description	

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

This plan outlines the action steps that the County of Orange will use to address housing and community development needs in the Orange Urban County. The plan includes a listing of activities that the County may undertake during FY 2019-20 (July 1, 2019 through June 30, 2020) that utilize CDBG, HOME, and ESG funds. For FY 2019-20, the County has a combined CDBG, HOME, and ESG allocation of \$4,979,791 including program income and prior year resources for CDBG. All proposed activities budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts. Funds less than \$100,000 from participating subrecipients by either project or administration that are not completely expended, will be kept by the County of Orange for reprogramming purposes.

The subrecipients have the option to redirect their approved Housing Rehabilitation or Public Facilities and Improvement project funding for capitol improvements to homeless shelter(s) in Orange County, subject to Board and HUD approval.

The County of Orange will submit a substantial amendment to HUD for approval to amend FY 2018-19 Annual Action Plan to allow City of Yorba Linda to redirect the balance of funds from two projects, ADA Improvements and Neighborhood Rehabilitation for capitol improvements to homeless shelter(s) in Orange County.

In their last year as a metro city (FY 2017-18), the City of Aliso Viejo did not expend \$28,763 of their CDBG funds, \$13,561 from project funds and \$15,202 in administrative funds. The City of Aliso Viejo has indicated that they would like to use the funds towards one of their projects. A Separation Agreement has been entered into and will be executed in order to transfer the funds to the City.

#### Projects

#	Project Name
1	County's Emergency Shelters (CDBG)
2	County's Emergency Shelters (ESG)
3	City of Laguna Beach Emergency Weather Shelter
4	Midway City Community Services and Education Center

#	Project Name
5	Single-Family Housing Rehabilitation (Brea)
6	Single-Family Housing Rehabilitation Program (Cypress)
7	Leisure World Bathroom Accessibility Program (Seal Beach)
8	Redirection of project funds to Homeless Shelter in Orange County (Stanton)
9	Brea Senior Center Kitchen Improvements (Brea)
10	FY 2019-20 Residential Street Resurfacing - CDBG (Cypress)
11	Pedestrian Accessibility Improvements Project Phase II (Laguna Woods)
12	Florence Sylvester Memorial Senior Center Rehabilitation (Laguna Hills)
13	Apartment Row Neighborhood Project (Los Alamitos)
14	Community Center Improvements (County of Orange)
15	Fair Housing Education, Counseling and Enforcement (Fair Housing)
16	Administration (CDBG)
17	Administration (HOME)
18	Placentia Hope Project (Colette's Children's Home)
19	Senior Nutrition Program (Yorba Linda)
20	ADA Improvements - Public Facility (Yorba Linda)
21	Neighborhood Improvement Program (Yorba Linda)
22	Administration (Yorba Linda)
23	Administration County (Yorba Linda)
24	Affordable Housing - HOME
25	Neighborhood Facility Improvements - PF&I Old City Hall (Placentia)
26	Neighborhood Improvements - Powell Building roof PF&I (Placentia)
27	Public Services - Neighborhood Services (Placentia)
28	Public Services - Senior Services (Placentia)
29	Housing Rehabilitation - SFR (Placentia)
31	Facade Improvement Program (Placentia)
32	Administration (Placentia)
33	Administration County (Placentia)
34	El Modena Family Resource Center (CAPOC)

**Table 7 - Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

The funding priorities are the same as outlined in the Strategic Plan.



**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	County's Emergency Shelters (CDBG)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$206,748
	<b>Description</b>	Funds will be used to provide essential service, operations, emergency shelter, showers and meals for homeless clients.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 610 homeless person are expected to benefit from the proposed activity.
	<b>Location Description</b>	Shelters in Orange County, CA
	<b>Planned Activities</b>	Funds will be used to provide essential service, operations, emergency shelter, showers and meals for homeless clients.
2	<b>Project Name</b>	County's Emergency Shelters (ESG)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	ESG: \$220,824
	<b>Description</b>	Funds will be used to provide essential services, operations, emergency shelter, showers, and meals for homeless clients, rapid rehousing, data research and input and administration of HUD-sponsored Urban County programs.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 462 homeless persons will be assisted through emergency shelter and 8 households through rapid rehousing.
	<b>Location Description</b>	

	<b>Planned Activities</b>	Funds will be used to provide essential services, operations, emergency shelter, showers, and meals for homeless clients, rapid rehousing, data research and input and administration.
<b>3</b>	<b>Project Name</b>	City of Laguna Beach Emergency Weather Shelter
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$125,856
	<b>Description</b>	Funds will be used to provide emergency shelter for 45 homeless individuals from the City of Laguna Beach and surrounding cities.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 45 person are expected to benefit from the proposed activity.
	<b>Location Description</b>	The emergency shelter called the Alternative Sleeping Location located at 20652 Laguna Canyon Road, Laguna Beach, CA.
	<b>Planned Activities</b>	Funds will be used to provide transportation to and from the emergency shelter for 45 homeless individuals from the City of Laguna Beach and surrounding cities along with essential services, meals and casework for the individuals.
<b>4</b>	<b>Project Name</b>	Midway City Community Services and Education Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Funds will be used to provide social services programming at the Community Center. Abrazar, Inc. will be responsible for delivery of continuous support of social services programs for residents within the immediate neighborhoods. Services provided include: educational, recreational, and cultural programming, transportation, senior citizen programming, employment, health and medical information and referrals.

	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 1075 person are expected to benefit from the proposed activity.
	<b>Location Description</b>	The Community Center is located at 14900 Park Ln, Midway City, CA.
	<b>Planned Activities</b>	Funds will be used to provide social services programming at the Community Center. Abrazar, Inc. will be responsible for delivery of continuous support of social services programs for residents within the immediate neighborhoods. Services provided include: educational, recreational, and cultural programming, transportation, senior citizen programming, employment, health and medical information and referrals.
5	<b>Project Name</b>	Single-Family Housing Rehabilitation (Brea)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$201,400
	<b>Description</b>	Funds will be used for the rehabilitation of single-family low or very-low income owner occupied residences. Improvements will include interior and exterior improvements to homes and mobile home units.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 9 households are expected to benefit from the proposed activity.
	<b>Location Description</b>	City of Brea
	<b>Planned Activities</b>	Funds will be used for the rehabilitation of single-family low or very-low income owner occupied residences. Improvements will include interior and exterior improvements to homes and mobile home units.
6	<b>Project Name</b>	Single-Family Housing Rehabilitation Program (Cypress)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities

	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$169,600
	<b>Description</b>	Funds will be used to support the Home Enhancement Program or HELP II, which provides forgivable loans up to \$20,000 to income eligible homeowners in order to assist them with home improvements.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated six (6) households are expected to benefit from the proposed activity.
	<b>Location Description</b>	City of Cypress
	<b>Planned Activities</b>	Funds will be used to support the Home Enhancement Program or HELP II, which provides forgivable loans up to \$20,000 to income eligible homeowners in order to assist them with home improvements.
<b>7</b>	<b>Project Name</b>	Leisure World Bathroom Accessibility Program (Seal Beach)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$190,800
	<b>Description</b>	Funds will be used to provide grants to income qualified, disabled seniors to improve bathroom accessibility and safety by converting the tub/shower into an accessible shower stall.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 60 - 85 households are expected to benefit from the proposed activity.
	<b>Location Description</b>	City of Seal Beach Leisure World
	<b>Planned Activities</b>	Funds will be used to provide grants to income qualified, disabled seniors to improve bathroom accessibility and safety by converting the tub/shower into an accessible shower stall.

8	<b>Project Name</b>	Redirection of project funds to Homeless Shelter in Orange County (Stanton)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$106,000
	<b>Description</b>	Funds will be used for improvements to homeless shelter(s) in Orange County.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeless persons are expected to benefit from the proposed activities.
	<b>Location Description</b>	County of Orange
9	<b>Planned Activities</b>	Funds will be used for improvements to homeless shelter(s) in Orange County.
	<b>Project Name</b>	Brea Senior Center Kitchen Improvements (Brea)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$212,000
	<b>Description</b>	Funds will be used to improve the Brea Senior Center kitchen, which will enhance efficiency, accessibility and safety for seniors volunteering in the kitchen, and the quality of nutritional of meals for seniors receiving the meals.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 52,000 people are expected to benefit from the proposed activity.
	<b>Location Description</b>	Brea Senior Center is located at 500 Sievers Ave, Brea, CA 92821

	<b>Planned Activities</b>	Funds will be used to improve the Brea Senior Center kitchen, which will enhance efficiency, accessibility and safety for seniors volunteering in the kitchen, and the quality of nutritional of meals for seniors receiving the meals.
<b>10</b>	<b>Project Name</b>	FY 2019-20 Residential Street Resurfacing - CDBG (Cypress)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$238,500
	<b>Description</b>	Funds will be used to resurface over 6,600 SF of residential street pavement using a rubberized overlay or a slurry seal mix.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 947 people are expected to benefit from the proposed activity.
	<b>Location Description</b>	North of Lincoln Avenue and east of Moody Street, Cypress
	<b>Planned Activities</b>	Funds will be used to resurface over 235,000 SF of residential street pavement using a rubberized overlay or a slurry seal mix.
<b>11</b>	<b>Project Name</b>	Pedestrian Accessibility Improvements Project Phase II (Laguna Woods)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$154,442
	<b>Description</b>	Funds will be used for the reconstruction curb ramps to comply with ADA requirements, sidewalk lifts and adjustments needed on Moulton Parkway.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 15,395 people are expected to benefit from the proposed activity.

	<b>Location Description</b>	Moulton Parkway, Laguna Woods
	<b>Planned Activities</b>	Funds will be used for the reconstruction curb ramps to comply with ADA requirements, sidewalk lifts and adjustments needed on Moulton Parkway.
<b>12</b>	<b>Project Name</b>	Florence Sylvester Memorial Senior Center Rehabilitation (Laguna Hills)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$74,200
	<b>Description</b>	Funds will be used to replace carpeting with non-skid flooring, install ADA accessible ramp and refurbish doors due to damage by mobility aids.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 4,575 seniors are expected to benefit from the activity.
	<b>Location Description</b>	Florence Sylvester Memorial Senior Center 23721 Moulton Pkwy, Laguna Hills, CA 92653
	<b>Planned Activities</b>	Funds will be used to replace carpeting with non-skid flooring, install ADA accessible ramp and refurbish doors due to damage by mobility aids.
<b>13</b>	<b>Project Name</b>	Apartment Row Neighborhood Project (Los Alamitos)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$143,100
	<b>Description</b>	Funds will be used for removal and replacement of sections of asphalt concrete and grind and overlay on Noel Street in the Apartment Row neighborhood from Katella Avenue to Farquhar Avenue.
	<b>Target Date</b>	6/30/2020



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 2,416 people are expected to benefit from the proposed activity.
	<b>Location Description</b>	City of Los Alamitos
	<b>Planned Activities</b>	Funds will be used for removal and replacement of sections of asphalt concrete and grind and overlay all on Noel Street in the Apartment Row neighborhood from Katella Avenue to Farquhar Avenue.
<b>14</b>	<b>Project Name</b>	Community Center Improvements (County of Orange)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$47,700
	<b>Description</b>	Funds will be used for improvements to County owned Community Center in Midway City.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 2,075 people in the surrounding community are expected to benefit from the improvements to the community center.
	<b>Location Description</b>	Midway City Community Center located at 14900 Park Ln, Midway City, CA
	<b>Planned Activities</b>	Funds will be used for improvements to County owned Community Center in Midway City.
<b>15</b>	<b>Project Name</b>	Fair Housing Education, Counseling and Enforcement (Fair Housing)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$52,000

	<b>Description</b>	Funds will be used to provide housing education, community events, counseling, enforcement, and landlord/tenant counseling. This will also include funding for a fair housing contractor or consultant to create the Analysis of Impediments for FY2020-24.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 2,325 people are expected to benefit from the activity.
	<b>Location Description</b>	Fair Housing Council of Orange County located at 1516 Brookhollow Drive, Santa Ana.
	<b>Planned Activities</b>	Funds will be used to provide housing education, community events, counseling, enforcement, and landlord/tenant counseling and updated to the FY2020-24 Analysis of Impediments for cities.
<b>16</b>	<b>Project Name</b>	Administration (CDBG)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$488,417
	<b>Description</b>	Funds will be utilized for administration of CDBG HUD-sponsored Urban County programs.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of CDBG HUD-sponsored Urban County programs.
<b>17</b>	<b>Project Name</b>	Administration (HOME)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration

	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	HOME: \$121,845
	<b>Description</b>	Funds will be utilized for administration of HOME HUD-sponsored Urban County program.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of HOME HUD-sponsored Urban County program.
<b>18</b>	<b>Project Name</b>	Placentia Hope Project (Colette's Children's Home)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$371,000
	<b>Description</b>	Funds will be used to improve substandard exterior and interior of seven 4-plex apartment building in the City of Placentia that provides shelter and supportive services to homeless women and children. The improvements will include painting, kitchen and bathroom improvements, new flooring, staircase improvements, roofing, driveways, water heaters, heating units and garage doors.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 322 homeless women and children are expected to benefit from the proposed activity.
	<b>Location Description</b>	Projected is located in Placentia.

	<b>Planned Activities</b>	Funds will be used to improve substandard exterior and interior of seven 4-plex apartment building in the City of Placentia that provides shelter and supportive services to homeless women and children. The improvements will include painting, kitchen and bathroom improvements, new flooring, staircase improvements, roofing, driveways, water heaters, heating units and garage doors.
19	<b>Project Name</b>	Senior Nutrition Program (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$36,401
	<b>Description</b>	Funds will be used to provide a Senior Nutrition Program. The program assist in providing nutrition meals to low to moderate income senior citizens or disabled persons.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 300 seniors and disabled are expected to benefit from the proposed activity.
	<b>Location Description</b>	Yorba Linda Community Center located at 4501 Casa Loma Ave, Yorba Linda.
	<b>Planned Activities</b>	Funds will be used for operational costs associated with the daily senior lunch program held at the Yorba Linda Community Center.
20	<b>Project Name</b>	ADA Improvements - Public Facility (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$65,507
	<b>Description</b>	Funds will be used to address ADA compliance in public buildings, parks and parking lots throughout the City
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 10,000 people are expected to benefit from the proposed activity.
	<b>Location Description</b>	Public buildings, parks and parking lot in the City of Yorba Linda.
	<b>Planned Activities</b>	ADA Improvements to public buildings, parks and parking lots in City of Yorba Linda.
<b>21</b>	<b>Project Name</b>	Neighborhood Improvement Program (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$92,233
	<b>Description</b>	Funds will be used to provide rehabilitation grants to qualified homeowners for general property improvements and repairs to meet local codes, standards and ordinances.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated ten (10) homeowners are expected to benefit from the proposed activity.
	<b>Location Description</b>	City of Yorba Linda
	<b>Planned Activities</b>	Funds will be used to provide rehabilitation grants to qualified homeowners for general property improvements and repairs to meet local codes, standards and ordinances.
<b>22</b>	<b>Project Name</b>	Administration (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$20,268
	<b>Description</b>	Funds will be utilized for administration of the City of Yorba Linda HUD-sponsored programs.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the City of Yorba Linda HUD-sponsored programs.
<b>23</b>	<b>Project Name</b>	Administration County (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$28,267
	<b>Description</b>	Funds will be utilized for administration of the Contracts for the City of Yorba Linda HUD-sponsored programs and ConPlan/AI.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the Contracts for the City of Yorba Linda HUD-sponsored programs and ConPlan/AI.
<b>24</b>	<b>Project Name</b>	Affordable Housing - HOME
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	HOME: \$1,122,943
	<b>Description</b>	Funds will be used for affordable housing development opportunities. This does not includes carryover funds.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	HOME funds may be utilized to assist in the development of up to 20 affordable rental housing units and up to 100 households with tenant-based rental assistance.
	<b>Location Description</b>	Through Orange County
	<b>Planned Activities</b>	Funds will be used for affordable housing development opportunities.
25	<b>Project Name</b>	Neighborhood Facility Improvements - PF&I Old City Hall (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$155,351
	<b>Description</b>	Funds will be used for improvements for HVAC and roof improvements to Old City Hall.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 700 people is expected to benefit from the proposed activity.
	<b>Location Description</b>	Old City Hall Public Building in Placentia, CA
	<b>Planned Activities</b>	Funds will be used for improvements to public facility.
26	<b>Project Name</b>	Neighborhood Improvements - Powell Building roof PF&I (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$65,000
	<b>Description</b>	Funds will be used for improvements to roof in the Powell building.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 500 people are expected to benefit from the proposed activity.
	<b>Location Description</b>	City of Placentia public facility
	<b>Planned Activities</b>	Funds will be used for roof improvements to Powell building.
27	<b>Project Name</b>	Public Services - Neighborhood Services (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$39,307
	<b>Description</b>	Funds will be used for the operations and support staff on the Neighborhood Services Division for various food distribution programs and coordinating services for low income residents.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 800 low income people are expected to benefit from the proposed activity.
	<b>Location Description</b>	Family Resource Center 900 S. Melrose, Placentia
	<b>Planned Activities</b>	Funds will be used for the operations and support staff on the Neighborhood Services Division for various food distribution programs and coordinating services for low income residents.
28	<b>Project Name</b>	Public Services - Senior Services (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$19,360
	<b>Description</b>	Funds will be used for the operations and support staff at the Senior Center.
	<b>Target Date</b>	6/30/2020



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 450 seniors are expected to benefit from the proposed activity.
	<b>Location Description</b>	Senior Center 143 S. Bradford Ave, Placentia
	<b>Planned Activities</b>	Funds will be used for the operations and support staff at the Senior Center.
<b>29</b>	<b>Project Name</b>	Housing Rehabilitation - SFR (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$12,500
	<b>Description</b>	Funds will be used for rehabilitation grants for single family and mobile homes.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 1 - 2 single family/mobile homes units will benefit from the proposed activity.
	<b>Location Description</b>	City of Placentia
	<b>Planned Activities</b>	Funds will be used for rehabilitation grants for single family and mobile homes.
<b>30</b>	<b>Project Name</b>	Facade Improvement Program (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Funds will be used for facade improvements for up to 1 - 5 businesses.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 1 - 5 businesses are expected to benefit from the activity.
	<b>Location Description</b>	City of Placentia
	<b>Planned Activities</b>	Funds will be used for façade improvements for up to 1 - 5 businesses.
<b>31</b>	<b>Project Name</b>	Administration (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$33,111
	<b>Description</b>	Funds will be utilized for administration of the City of Placentia HUD-sponsored programs.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the City of Placentia HUD-sponsored programs.
<b>32</b>	<b>Project Name</b>	Administration County (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$45,111
	<b>Description</b>	Funds will be utilized for administration of the Contract for the City of Placentia HUD-sponsored programs and ConPlan/AI.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the Contract for the City of Placentia HUD-sponsored programs and ConPlan/AI.
<b>33</b>	<b>Project Name</b>	El Modena Family Resource Center (CAPOC)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$20,000
	<b>Description</b>	Funds will be used to provide social services programming. CAPOC will be responsible for the delivery of intergenerational social services including: recreational, educational and cultural programming, health services, employment information and referrals, and senior citizen activities.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 990 person are expected to benefit from the proposed activity.
	<b>Location Description</b>	<p style="margin: 0in 0in 8pt;">&lt;font face="Calibri" size="3"&gt;The Community Center is located at 18672 E. Center Ave, Orange.&lt;/font&gt;&lt;/p&gt;</p>
	<b>Planned Activities</b>	Funds will be used to provide social services programming. CAPOC will be responsible for the delivery of intergenerational social services including: recreational, educational and cultural programming, health services, employment information and referrals, and senior citizen activities.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The “Urban County” of Orange is comprised of 11 cities with populations under 50,000 (participating cities), two “Metro” cities –Placentia and Yorba Linda – with populations over 50,000, and the unincorporated areas of Orange County. The 11 participating cities include Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Seal Beach, Stanton, and Villa Park. With populations over 50,000, Placentia and Yorba Linda are eligible to participate in the CPD programs as entitlement jurisdictions and receive funding directly from HUD. However, these cities have elected to join the Urban County for the overall implementation of these programs.

Currently, the County uses a competitive funding application process to distribute CDBG funds. Individual participating cities and County departments are required to submit applications for funding. OC Housing and Community Development works with an Evaluation Committee to rank each application. The Committee ranks the applications according to the Consolidated Plan priorities, urgency of needs, readiness of projects, experience of program/project administrators, and cost-effectiveness. The committee consists of an evaluation team comprised of professionals knowledgeable about community development, community services, and housing activities. Many factors, such as the administrative burden of the program, the number of eligible census block groups, annexations, and population growth in the participating cities, weigh into the analysis of the most efficient and effective way to distribute CPD funds to meet the high-priority activities outlined in this Annual Action Plan.

The competitive basis for funding distribution has the advantage of flexibly dealing with the changing needs and geographic disparities in terms of needs and resources. Using this method, the County is able to devote resources to communities where the needs are most urgent and extensive.

CDBG program funds will be distributed and expended based on program criteria. Housing rehabilitation programs will be provided on a citywide basis in each participating city and in the unincorporated County areas based on low- and moderate-income qualified residents. Supportive services will be available throughout the Urban County to low- and moderate-income residents and persons with special needs. Public and infrastructure improvements will be located primarily in the Urban County’s low- and moderate-income areas. HOME funds will be distributed to those projects that meet priority needs and meet other underwriting factors that indicate a strong probability the project will come to fruition. ESG funds will be awarded to projects that will best serve the priority needs of homeless individuals and families and those at risk of becoming homeless.

**Geographic Distribution**

Target Area	Percentage of Funds

**Table 8 - Geographic Distribution****Rationale for the priorities for allocating investments geographically**

The Urban County has not established geographic target areas for expending funds.

**Discussion**

See discussion above.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The Orange Urban County plans to utilize CDBG and HOME funds to support a number of authorized housing activities, including various residential rehabilitation programs and an affordable housing development program. HOME funds may be allocated to assist in the development of up to 20 affordable rental units for homeless and tenant based rental assistance.

One Year Goals for the Number of Households to be Supported	
Homeless	120
Non-Homeless	96
Special-Needs	0
Total	216

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	100
The Production of New Units	20
Rehab of Existing Units	96
Acquisition of Existing Units	0
Total	216

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

See discussion above.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The public housing needs of Urban Orange County residents are met by the Orange County Housing Authority (OCHA), a division within Orange County Community Resources/OC Homeless, Housing and Community Development.

### **Actions planned during the next year to address the needs to public housing**

There are no public housing projects in the Urban County program.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

There are no public housing projects in the Urban County program.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable.

### **Discussion**

See discussions above.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Factors contributing to the rise in homelessness include a lack of housing affordable to low- and moderate-income persons, increases in the number of persons whose income falls below the poverty level, reductions in subsidies to the poor, drug/alcohol abuse, and the de-institutionalization of the mentally ill. The recent housing market and economic conditions have also resulted in some families facing homelessness due to foreclosures, unemployment, and/or underemployment.

With the implementation of Coordinated Entry, the community has identified the lack of affordable housing in the area as the largest challenge to housing the chronically homeless. When housing is found in the private market, it often has requirements that are challenging for homeless clients to meet such as background checks. Many owners have policies that deny tenancy to individuals with felonies. Unfortunately, many of the chronically homeless individuals have criminal backgrounds that make it challenging to obtain housing and therefore wait longer periods of times to be housed.

Homeless people in Orange County are diverse: they are young and old, men and women, chronic and newly homeless, alone or in families. Despite their differences, each homeless person is in need of safe and permanent housing. The County of Orange recognizes that fully engaging in efforts to end homelessness requires a deeply involved community and accurate information. Based on the findings from the 2017 Orange County Point-In-Times Count and Survey, a total of 4,792 individuals are homeless on any given night. This represents an increase of roughly 7% from the 2015 PIT Count (or an increase of 340 individuals).

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The goals include reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs, which includes opening a year-round emergency shelter/service center site and deploying resources to place homeless in permanent supportive housing.

Since 1998, the County of Orange has had a comprehensive, coordinated, and regional Continuum of Care strategy that includes participation of all 34 cities in Orange County, County Agencies, the County's homeless housing and service providers, and other community groups, including non-profits, local governmental agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools and other stakeholders to identify the gaps and unmet needs of the County's homeless. Homeless needs and priorities continue to be identified through the County's Continuum of Care (CoC) system. All CoC committees and subcommittees are public and inclusive to participation of



all stakeholders including homeless and formerly homeless individuals. In addition, the CoC consults with and engages homeless individuals to participate in the Point-in-Time Count and Survey of the homeless and the various committees and subcommittees of the CoC to address the emergency shelter and transitional housing needs of homeless persons.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The County has allocated \$215,846 in ESG funds and \$332,604 in CDBG funds during FY 2018-19 for essential services, operations, emergency shelter, showers, and meals for homeless clients. The County operates the “Armory Emergency Shelter Program,” which allows for emergency shelter for approximately five months out of the year, serving a maximum capacity of 400 individuals nightly, divided between two locations.

The County rehabbed a facility at 1000 N. Kraemer Place in Anaheim for use as Year Round Emergency Shelter for 200 people. CDBG funds were allocated to support the rehabilitation of this shelter. The County also applied to be the Administrative Entity for allocation of State ESG funds. This has brought an additional \$1,208,146 of funding to the County to address emergency shelter and transitional housing needs of homeless persons.

In October of 2016, the County opened The Courtyard emergency shelter which shelters up to 425 adults (individuals, couples and pets). It is also a multi-service drop in center providing meals, showers, laundry and other supportive services on a daily basis. In March of 2018, the County also funded the opening of 2 other shelters. These shelters are funded entirely with County general funds.

SAFEPlace is a 60-bed women’s shelter in Santa Ana, which offers services, and shelter, SAFEPlace is operated by WISEPlace, Inc., a long-term community partner with a long history of serving homeless women in Orange County. SAFEPlace is co-located at their site with their transitional housing program.

Additionally, the County funded a 16-bed couple’s shelter/bridge housing program due to the demand for couple’s shelter in a non-congregate setting. American Family Housing operates this program using a scattered site model.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The goal of the current model of homeless case management is to move clients towards self-sufficiency

and a permanent home. This current system model works well when partnered with a variety of supportive services that can prevent a client against future homelessness. In Orange County, a variety of private, federal, state and county-funded programs offer job training courses, child care, work-appropriate clothing, food bags and/or meals, among other services. Many of these services follow clients through their shelter stay(s), and sometimes even after they have found permanent housing. The variety of non-profit service providers that have formed in Orange County over the last 30 years has meant that many different types of clients can be served simultaneously. Each provider tends to specialize in a particular type of client in order to tailor services effectively. Currently served populations include, but are not limited to: families, victims of domestic violence, veterans, chronically homeless men and women, individuals with mental health issues and their families, and individuals with physical and developmental disabilities and their families.

The Continuum of Care Board has committees that focus on the subpopulations such as veteran, families, Transitional Age Youth (TAY) etc. With Coordinated Entry there is additional focus on creating the correct system/s for the County as well as the subpopulations and their diverse needs.

Historically, the most difficult clients to house are the chronically homeless. Most chronically homeless people have a disability that requires significant and costly support. One program that is developing permanent housing units tied to supportive services is the Mental Health Services Act (MHSA) Housing Program. Orange County most recently approved \$70.5 million in local MHSA funds for the development of supportive housing. In addition to the MHSA Housing Program, other housing and supportive services are provided through the MHSA Community Services and Supports component of the MHSA for clients enrolled in a Full Service Partnership Program. Clients of these programs must be seriously mentally ill adults or older adults or seriously mentally ill/seriously emotionally disturbed children and youth. The programs are client and family-driven and provide flexible resources that are tailored to each client's specific needs. Additionally, the County adopted an Housing Funding Strategy and allocated a total of \$14 million since 2016 in Federal HOME and local funds for the development of Permanent Supportive Housing for the homeless through a Notice of Funding Availability.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The most fundamental risk factor for becoming homeless is acute poverty. Orange County has dozens of organizations, both private and public, providing resources to those at risk of homelessness. The solutions to developing a system capable of ensuring that people have the right resources to remain

housed generally involve a continued high level of supportive services once an individual or family has been placed in permanent housing.

The CoC has developed action plans and is reviewing its structure to ensure it is more effectively creating systems of care that are formally linked and coordinated with the various existing systems such as those listed in the prompt. Implementation of the Mental Health Services Act in Orange County has provided a large array of supportive services for those who are homeless or at high-risk of homelessness as well as having a serious mental illness. Supportive services include, but are not limited to, employment services, mentoring, in-home crisis stabilization, education and training, centralized assessment team services, recovery centers, residential treatment, a wellness center, and a transitional age youth discovery program.

The County of Orange was approved through the State of California's Department of Health Care Services (DHCS) on October 24, 2016 for a five-year project to implement the Whole Person Care (WPC) pilot program. WPC is the coordination of physical, behavioral health, and social services in a patient-centered approach with the goals of improved health and well-being through more efficient and effective use of resources for Medi-Cal beneficiaries struggling with homelessness. WPC promotes increased communication between hospital emergency rooms, CalOptima, community clinics, OC Health Care Agency (HCA) Behavioral Health Services and Public Health Services as well as recuperative care providers to improve access and navigation of services for the homeless population. This effort is working in coordination with the shelter system, CoC and CES.

## **Discussion**

See discussion above.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The County recognizes that barriers to affordable housing exist and continues to employ strategies to overcome them.

**Lack of Affordable Housing Funds:** The availability of funding for affordable housing has been severely affected by the dissolution of redevelopment agencies in the State of California.

**Environmental Protection:** State law (California Environmental Quality Act and California Endangered Species Act) and federal law (National Environmental Policy Act and Federal Endangered Species Act) regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, use permits, etc.). Costs and time delay resulting from the environmental review process are also added to the cost of housing.

**Land Use Policies:** Housing growth is expected to slow in many South County cities as they reach “build-out” because the trend of higher density housing is not widely accepted in these areas. Homeowners associations and their related CC&Rs, the predominant development form after the 1970s that most of South Orange County was developed under, may also prevent local land use flexibility and the policies necessary to address workforce housing challenges over the long-term.

**Planning and Development Fees:** Planning and development impact fees, such as for transportation, water, and sewer infrastructure improvements, often add to the overall cost of development.

**Permit and Processing Procedures:** Builders and developers frequently cite the cost of holding land during the evaluation and review process as a significant factor in the cost of housing. Processing times vary with the complexity of the project. Holding costs associated with delays in processing have been estimated to add between 1.1 percent and 1.8 percent to the cost of a dwelling unit for each month of delay.

**State and Federal Davis-Bacon Prevailing Wages:** The State Department of Industrial Relations (DIR) expanded the kinds of projects that require the payment of prevailing wages. Prevailing wage adds to the overall cost of development. A prevailing wage must also be paid to laborers when federal funds are used to pay labor costs for any project over \$2,000 or on any multi-family project over eight units. Based on discussions with developers, various prevailing wage requirements typically inflate the development costs by 35 percent.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the**

## **return on residential investment**

In January 2009, the Orange County Board of Supervisors amended the Housing Opportunities Overlay Regulations to expand the Overlay to high density multi-family residential districts located along arterial highways. Originally adopted in 2006, the Housing Opportunities Overlay Regulations permit the “by-right” development of affordable housing units on commercial, industrial and certain high density residential zoned sites through an administrative approval process.

The County and participating cities have also worked to address the issues surrounding barriers to affordable housing development through the Housing Element process required by the State of California. The California Department of Housing and Community Development (HCD) must review the Housing Element for compliance with State law. Among other things, each jurisdiction’s Housing Element is required to identify opportunity sites with land use controls that facilitate affordable housing development. Another key component of HCD review is the extent of government policies that act as barriers to housing development, especially affordable housing development, and the jurisdiction’s commitment to eliminating or mitigating the barriers.

Each jurisdiction in California (including all participating cities and the County of Orange) adopts a housing element as a required component of the general plan. The County of Orange 2014-2021 Housing Element was adopted in December 2013. The document includes specific actions to facilitate affordable housing.

In 2018, the County authorized an increase to the 2016 Permanent Supportive Housing Notice of Funding Availability with an emphasis on developing extremely low-income housing by \$2 million dollars for a total of \$14 million in Orange County Housing Successor Agency funds and Federal HOME Investment Partnerships Program funds and added another 50 Project Based VASH Vouchers to the already 200 Project Based Housing Choice and/or VASH Vouchers previously approved. The County has also approved a Zoning Code amendment that allows emergency shelters “by-right” (with no public hearing requirement) in commercial and industrial zoned areas.

To address neighborhood resistance to affordable housing, OC Housing and Community Development encourages all developers to work closely with local residents and community groups. In efforts to educate the public about affordable housing efforts, the County also consults with the Kennedy Commission, a nonprofit organization that provides advocacy and education related to affordable housing in the County. The County’s 2014-21 Housing Element establishes an action that the County’s Affordable Housing Project Manager and OC Housing and Community Development staff will work cooperatively with other governmental agencies, business groups, universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County’s long-term viability.

**Discussion:** See discussions above.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Priority Needs established in the FY 2015-19 Five-Year Consolidated Plan, which form the basis for establishing objectives and outcomes in the FY 2019-20 One-Year Action Plan, are as follows:

#### High Priority

- Expand and preserve the supply of affordable housing to create housing opportunities for low- and moderate-income households and homeless individuals and families
- Strengthen, preserve, and enhance the physical character and quality of life in Orange County's low- and moderate-income neighborhoods, including the housing stock and public infrastructure and facilities.
- Continue to build the capacity of residents to empower themselves and help strengthen their community, through the funding of needed public services for seniors, the homeless, and those at risk of homelessness.
- Planning and administration.

### **Actions planned to address obstacles to meeting underserved needs**

One of the greatest challenges in meeting the underserved needs of low- and moderate-income persons is having limited financial resources. The County must weigh and balance the input from different groups and assign funding priorities that best bridge the gaps in the County's service delivery system. While other goals the County has set are also important, for the purposes of the Consolidated Plan, only those which are anticipated to be funded with CPD funding programs (CDBG, HOME, and ESG) during the five-year planning cycle are indicated to be high priorities. The County utilizes other funding sources to meet goals that are not considered high priority in the Consolidated Plan. The County established priorities for allocating CPD funds based on a number of criteria, including:

- Urgency of needs
- Cost efficiency
- Eligibility of activities/programs
- Availability of other funding sources to address specific needs
- Funding program limitations
- Capacity and authority for implementing actions
- Consistency with countywide goals, policies, and efforts

### **Actions planned to foster and maintain affordable housing**

OCHA's Section 8 Housing Choice Voucher Program provides assisted families an incentive for employment opportunities through its Family Self Sufficiency (FSS) Program. The FSS Program

participants receive resources and are taught job skills that enable them to gain employment and become self-sufficient.

Furthermore, housing costs often consume a large portion of lower-income households' monthly income. This creates a housing cost burden, leaving less money accessible for other necessities. As such, the County's efforts to create new affordable housing, both permanent and transitional, and rehabilitate existing housing contribute to curbing poverty in the County. In addition, to the funding and project based vouchers, the County has made available for the development of supportive housing. The County approved a Housing Finance Strategy in 2018 for the development of 2,700 units of new supportive housing over the next seven years. The County also approved an MHSA Permanent Supportive Housing Spending Plan in 2018 for allocation of \$70.5 million in MHSA funds for supportive housing for mental ill.

### **Actions planned to reduce lead-based paint hazards**

In Orange County, the Childhood Lead Poisoning Prevention Program (CLPPP) follows children with abnormal or high blood lead levels, making home visits to families of affected children to determine the source of lead and provide education about lead poisoning. Program staff also coordinates health care needs; follow-up visits when needed, and provides outreach and educational presentations to the community. CLPPP also provides resources to cities with significant number of older housing units to help respond to complaints of deteriorated lead-based paint and other lead-related hazards in residential housing.

The CLPPP's Environmental Health Department is currently working toward:

- Using progressive notification and action to achieve elimination of lead hazards identified during environmental investigations;
- Developing and implementing programs for training of investigation and enforcement agency personnel on identifying and correcting lead hazards in high risk jurisdictions;
- Providing educational materials on renovation and remodeling activities to housing and building departments, for public distribution; and
- Encouraging building departments to incorporate informing about lead-safe work practices into their building permit process (such as attaching renovation pamphlets to building permits) for housing built before 1978.

### **Actions planned to reduce the number of poverty-level families**

One of the greatest challenges in meeting the underserved needs of low- and moderate-income persons is having limited financial resources. The County must weigh and balance the input from different groups and assign funding priorities that best bridge the gaps in the County's service delivery system. While other goals the County has set are also important, for the purposes of the Consolidated Plan, only those which are anticipated to be funded with CPD funding programs (CDBG, HOME, and ESG) during

the five-year planning cycle are indicated to be high priorities. The County utilizes other funding sources to meet goals that are not considered high priority in the Consolidated Plan. The County established priorities for allocating CPD funds based on a number of criteria, including:

- Urgency of needs
- Cost efficiency
- Eligibility of activities/programs
- Availability of other funding sources to address specific needs
- Funding program limitations
- Capacity and authority for implementing actions
- Consistency with countywide goals, policies, and efforts

### **Actions planned to develop institutional structure**

The institutional structure, through which this Annual Action Plan will be implemented, includes various agencies of County government, participating cities, nonprofit organizations, and private industry. Housing and Community Development has oversight responsibility for the Consolidated Plan/Annual Plan processes including oversight of regulatory requirements such as NEPA, Fair Housing, Section 3, etc. Housing and Community Development is a component of OC Community Resources, which consists of OC Animal Care, OC Community Services, OC Homeless, Housing & Community Development, OC Parks, and OC Public Libraries.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Housing and Community Development is responsible for the administration and compliance of programs and grant management. Housing and Community Development performs audits, compliance, and legal notification procedures required by HUD for both the Housing and Neighborhood Preservation and Housing Assistance functions. Because Housing and Community Development must make recommendations on compliance matters, it is separate from direct control of either of the other functions identified below. It also conducts the Annual Application Review process that is the competitive evaluation process by which Federal funding is allocated to special projects.

OC Homeless, Housing and Community Development oversees housing community development and homeless activities, such as public infrastructure, housing rehabilitation, community development, preservation and improvement activities, affordable rental housing, homeownership activities, homeless activities and support of CoC activities through the administration of subrecipient contracts and loans funded through the CDBG, HOME, ESG, and Supportive Housing Grants programs.

The cities of Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Seal Beach, Stanton, and Villa Park participate in the County program and are responsible for



delivering specific programs and activities in their communities. The cities of Placentia and Yorba Linda are participating as Metro cities and are responsible for delivering specific programs and activities in their communities.

Nonprofit organizations play a vital role in implementing the Annual Action Plan. Nonprofit organizations form a network of resources that address a wide variety of housing and community development needs. These organizations provide a valuable link between the population in need of assistance and the pool of resources available. These organizations are awarded entitlement funds through a competitive evaluation process. The County works with numerous nonprofit organizations annually.

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

**Discussion:**

See discussions above.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

The following describes other program-specific requirements.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

FY 2018-19 HOME funds will be used primarily for the development of affordable housing.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The County had previously provided homebuyer assistance using HOME funds and CDBG funds are used to operate a Neighborhood Preservation Program for housing rehabilitation assistance. As a condition of receiving HOME and CDBG grant or loan funds, the County requires the applicant to enter into a covenant agreement that is recorded against the property and runs with the land. The agreement contains a recapture restriction stipulating that during the affordability period if the unit is sold, the grant or loan must be paid in full.

The County offers Mortgage Assistance Program (MAP) loans to assist eligible low income first-time homebuyers on a first-come, first-serve basis to purchase their own decent affordable houses in the unincorporated areas of Orange County and in certain participating Cities within the County. Mortgage Assistance Program loans provide eligible first-time homebuyers part of the purchase price of their home to bridge the gap between the total purchase price of the home and the home buyer's down payment, closing costs and 1st mortgage. Eligible first time homebuyer's annual income must not exceed 80% of the Area Median Income (AMI). The total sales prices for a HOME funded property shall not exceed the maximum HOME purchase price for Orange County. All applicants must attend a homebuyer education workshop. Borrowers must qualify for and obtain first mortgage loan from a participating lender. Potential homebuyers may obtain additional information on the County of Orange/OC Community Services' website which links to the administrator for the County's MAP Program.

In accordance with the requirements of the HOME Program (24 CFR Part 92), these properties assisted with HOME funds are subject to affordability restrictions. Since in all cases the County's Mortgage Assistance Program provides HOME direct assistance to eligible first time home buyers in the form of loans, all homebuyers that receive a MAP loan have received direct HOME assistance. Therefore, the County uses recapture provisions to enforce the HOME affordability requirements in its homebuyer program, and does not use resale provisions.

Borrowers must occupy the Property as Borrower's principal place of residence for thirty (30) years from the date the loan is made. Prior to the 30th year, Borrower has the right to prepay the outstanding principal amount of the loan plus the simple interest that is due. If Borrower prepays the original amount of the loan plus simple interest, the Deed of Trust and the requirement that Borrowers must occupy the Property as Borrower's principal place of residence will no longer be in

effect.

Mortgage Assistance Program loans from the County are deferred loans. This means that Borrowers do not have to make any payments on the loan for 30 years, provided the Borrower owns and occupies the home and does not violate any of the terms of the Mortgage Assistance Program loan. The loan carries a simple interest rate of three percent (3%). Thirty (30) years from the date the loan is made, the Borrower will be required to repay the principal amount of the loan (direct HOME subsidy) plus all accrued interest.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

During the thirty-year affordability period, if the Borrower is going to transfer all or any part of the property (either voluntarily through a sale, or involuntarily through a foreclosure or similar transaction), it must notify the County, in advance and in writing and receive the County's written approval. At transfer, the Borrower will be required to repay the loan with the net proceeds of sale/distribution of proceeds at foreclosure. If there are insufficient net proceeds for the County to recapture the loan plus interest, the County will recapture the full amount of net proceeds available and the loan will be considered satisfied. Net proceeds are the sales price of the home minus the first mortgage repayment and any applicable closing costs.

Certain transfers are **not** permitted, including transfers: (i) by a Borrower to an existing spouse or domestic partner who is also an obligor under the Note; (ii) by a Borrower to a spouse or domestic partner where the spouse or domestic partner becomes the co-owner of the Property; (iii) between spouses as part of a marriage dissolution proceeding; (iv) to an existing spouse or domestic partner of Borrower by devise or inheritance following the death of Borrower; (v) by Borrower into an inter vivos trust in which Borrower is the beneficiary; (vi) by deed of trust or imposition of a lien subordinate to the Deed of Trust or (vii) refinance of the First Mortgage or any CalHFA Mortgages, meeting the requirements of Section 11 of the Promissory Note.

Mortgage Assistance Program loans are repaid per the terms of a Promissory Note which is secured by a Deed of Trust. In addition, the County executes a Borrower Disclosure Statement with the Borrower, in order to convey all the HOME requirements that apply during the affordability period (principal residence, recapture requirements, default).

The County will conduct yearly monitoring to insure that Borrowers are in compliance with the terms of their Mortgage Assistance Program loan, including, but not limited to, the requirement that Borrowers use the home as their principal place of residence. In the event of noncompliance during the period of affordability by the Borrower under the terms of the Mortgage Assistance Program

loan or their First Mortgage loan, the total amount of the Borrower's Mortgage Assistance Program loan and simple interest owed shall immediately become due and payable. Noncompliance occurs when an owner (1) vacates the unit or rents the unit to another household or, (2) sells the home without the County receiving recaptured funds due at time of sale.

In the event of noncompliance with the affordability requirements, or default on any loan terms, all outstanding principal plus simple interest is due and immediately payable. If the Borrower is unable to repay the loan when due, an additional financial penalty may be imposed by the County per the terms of the Borrower's Promissory Note.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

This plan does not include use of HOME funds to refinance existing debts for multifamily housing.

### **Emergency Solutions Grant (ESG) Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Included is the draft standards developed by the jurisdictions. ESG entitlement jurisdictions will utilize assessment and evaluation instruments developed in consultation with local ESG recipients in the County (i.e. Santa Ana, Garden Grove and Anaheim) that have been meeting on a regular basis to standardize the monitoring forms and process to minimize any duplication of efforts and to better align values and priorities. The County will ensure the ongoing effectiveness of the program's design and standards. In addition, the County will ensure that subrecipients comply with eligibility and verification requirements including HMIS.

#### ESG and CoC Coordination & Collaboration

In collaboration with other ESG service providers, these written standards have been developed by ESG grantees within Orange County, including OC Homeless, Housing and Community Development, the City of Anaheim, City of Garden Grove, City of Santa Ana and CoC. This collaboration allows for input on the standards and implementation process developed by organizations that directly provide homeless and housing services, Rapid Re-housing (R/R), and Homelessness Prevention (HP). *The ESG Written Standards are expected to be adopted by the CoC Board, and City ESG recipients.*

These written standards will be reviewed and revised at least annually, or as needed, to continue to build upon and refine this document.

In addition, subrecipients are required to develop and implement written policies and procedures in compliance ESG regulations and program objectives.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Provided are the current standards utilized by subrecipient which also meet HUD requirements. Provisions in the CoC Program interim rule at 24 CFR 578.7(a)(8) require that CoCs establish a Centralized or Coordinated Assessment System (CES). (HUD uses the terms coordinated entry and coordinated entry process instead of centralized or coordinated assessment system to help avoid the implication that CoCs must centralize the assessment process, and to emphasize that the process is easy for people to access, that it identifies and assesses their needs, and makes prioritization decisions based upon needs). HUD's primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present. Most communities lack the resources needed to meet all of the needs of people experiencing homelessness.

The County of Orange Homeless Services Section is the lead for CES. CES creates a single point of entry, follows a standardized entry protocol and prioritization for placement policy (Prioritization for Permanent Supportive Housing Opportunities Policy, #CE-CA602-15-001 approved by the Commission to End Homelessness, July 31, 2015) and utilizes a single, standardized assessment tool to screen applicants for available programs throughout Orange County.

At this time, the CoC has implemented Coordinated Entry for Permanent Supportive Housing and Rapid Rehousing.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The County has already aligned its funding to align with the priorities of the Continuum of Care to fill gaps in the system of care. As an Urban County, the County of Orange coordinates with its local participating cities on policies on funding. The funding for emergency shelter has been established as a high priority regionally.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions

regarding facilities and services funded under ESG.

Since 1998, the County of Orange has had a comprehensive, coordinated, and regional Continuum of Care strategy that includes participation of all 34 cities in Orange County, County Agencies, the County's homeless housing and service providers, and other community groups, including non-profits, local governmental agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools and other stakeholders to identify the gaps and unmet needs of the County's homeless. Homeless needs and priorities continue to be identified through the County's Continuum of Care system.

5. Describe performance standards for evaluating ESG.

The County will continue to use the outcome standards indicated in the Consolidated Plan as a preliminary performance standard and will continue to review these standards in consultation with the CoC to determine their appropriateness in measuring the performance of the ESG program. Besides regular site visits to provide technical assistance to subrecipients, all projects/programs funded by OC Housing and Community Development are monitored throughout the fiscal year for performance and compliance.

See discussion above.