



FINAL

FY 2023-2024

CONSOLIDATED ANNUAL PERFORMANCE  
EVALUTATION REPORT

(CAPER)

September 17, 2024

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**Attachments**

**Attachment 1: IDIS Program Reports**

- *PR03 - CDBG & CV Activity Summary Report (GPR)*
- *PR23 – Summary of Accomplishments Report*
- *PR26 – CDBG & CV Financial Summary Report*
  
- *PR01 – HUD Grants and Program Income*
- *PR02 – List of Activities by Program Year and Project*
- *PR05 – Drawdown Report by Project and Activity*
- *PR09 – Program Income Details by Fiscal Year and Program*

**Attachment 2: Map of CDBG-eligible Census Tract Block Groups**

**Attachment 3: Summary of Fair Housing Impediments and Actions to Address Impediments**

**Attachment 4: Public Notice and Summary of Public Comments**

## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Lake Forest ("City") adopted its Fiscal Year ("FY") 2020-2024 Five-Year Consolidated Plan on June 16, 2020, which established objectives for the City's Community Development Block Grant ("CDBG") program in order to create a viable community by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. The objectives identified included the following:

1. Rehabilitate the City's existing single-family housing stock, including mobile homes
2. Conserve the existing supply of affordable housing
3. Provide supportive housing and services for the homeless and those at risk of becoming homeless
4. Provide needed community services and infrastructure improvements benefitting low- and moderate-income persons and those with special needs
5. Focus on expanding economic opportunities for low- and moderate-income residents.

During FY 2023-2024, the fourth year of the five-year cycle, the City carried out a variety of activities to address Consolidate Plan objectives, including the following:

- Assisted with the rehabilitation of 14 housing units owned by low- and moderate-income households
- Funded a variety of safety net public service grant programs to prevent homelessness and assist lower-income households; 2,900 Lake Forest residents were assisted with FY 2023-2024 funds
- Four capital projects were funded during the reporting period, which included: the ADA Ramp Improvement Projects Phase 13 and 14, the Accessible Pedestrian Signals Project, and the Senior Center Patio Covering Project

In FY 2023-2024, the US Department of Housing and Urban Development ("HUD") awarded the City \$520,784 of CDBG funds. In addition, the City had prior-year unexpended funds (\$752,481.57) and received \$149,653.62 in program income generated from the repayment of housing rehabilitation loans. A total of \$1,422,919.19 of CDBG funds were available for expenditure in FY 2023-2024. These funds were allocated to public service grants, housing activities, paint grants, public facility improvements, and program administration as shown in Table 1 below.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Economic Opportunities	Non-Housing Community Development	CDBG: \$0	Businesses assisted	Businesses Assisted	50	0	0.00%	0	0	0.00%
Homeless Continuum of Care	Homeless	CDBG: \$43,115.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,500	580	23.20%	1,368	580	42.40%
Homeless Continuum of Care	Homeless	CDBG: \$0	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	50	0	0.00%	0	0	0.00%
Homeless Continuum of Care	Homeless	CDBG: \$0	Homeless Person Overnight Shelter	Persons Assisted	30	0	0.00%	0	0	0.00%
Homeless Continuum of Care	Homeless	CDBG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%	0	0	0.00%
Homeless Continuum of Care	Homeless	CDBG: \$0	Homelessness Prevention	Persons Assisted	250	580	232.00%	17	0	0.00%
Housing Preservation	Affordable Housing	CDBG: \$0	Homeowner Housing Added	Household Housing Unit	0	0	0.00%	0	0	0.00%

Housing Preservation	Affordable Housing	CDBG: \$226,875.15	Homeowner Housing Rehabilitated	Household Housing Unit	40	0	0.00%	11	14	127.27%
Infrastructure and Facility Improvements	Non-Housing Community Development	CDBG: \$501,383.70	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7,500	5,755	76.73%	100	5,755	5,755.00%
Program Administration	Administration	CDBG: \$78,385.54	Other	Other	450	450	100.00%	95	101	106.32%
Public Social Services	Non-Homeless Special Needs Low & Moderate-income Households	CDBG: \$71,672.47	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	8,000	1,525	19.06%	2,400	2,799	116.63%
Public Social Services	Non-Homeless Special Needs Low & Moderate-income Households	CDBG: \$0	Homeless Person Overnight Shelter	Persons Assisted	0	0	0.00%	0	0	0.00%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

As summarized above, the City focused CDBG funds on addressing Consolidated Plan priority needs during the reporting period. Consistent with the Plan, the City focused public service grant resources on safety net programs for lower-income households; the City allocated approximately 11% of CDBG funds for public services. FY 2023-2024 reporting period accomplishments for CDBG funds include the following:

- South County Outreach’s food bank program allowed lower-income households to focus limited financial resources on maintaining housing, thus preventing homelessness.
- Family Assistance Ministries provided food, rent, and utility assistance to lower-income households at risk of eviction and utility service shut-off. Program participants also benefitted from case management services.
- Families Forward provided transitional housing and rapid rehousing, including supportive services to homeless families with children.
- Camino Health Center provided reduced-cost medical and pediatric dental care services for lower-income households, including the uninsured and the homeless.
- Age Well provided case management services to assess homebound senior’s health and living situation, thus helping seniors remain healthy, housed, and avoid costly institutionalization in managed care facilities.
- Alzheimer’s Orange County provided reduced-cost daycare services for seniors with Alzheimer’s, dementia, or disabilities.

Fair Housing Council of Orange County provided fair housing outreach, education, and enforcement service for tenants and landlords.

The City’s Housing Rehabilitation Program helped preserve and improve the City’s existing stock of owner-occupied housing (including mobile homes) - 14 homeowners received housing rehab assistance during the reporting period. Typical improvements include installing energy-efficient windows, heating/ac systems, plumbing, roofs, flooring, and exterior painting. The City’s Neighborhood Pride Paint Program assisted four homeowners. The Office for the Coordination of Humanitarian Affairs (“OCHA”) provided rental assistance to 161 Lake Forest renter households, including seniors, disabled, homeless, and veteran households.

Three prior year public infrastructure/facility improvement projects were underway during the FY 2023-2024 report period: The Accessible Pedestrian Signal (APS) project, the El Toro Park Project, the ADA Ramps Phase 13 and 14 projects that provided for the construction of ADA-compliant sidewalk curb ramps. In addition, the Senior Patio Covering Project was undertaken. A summary of activities underway during FY 2023-2024 is provided in Attachment 1.



## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

### 91.520(a)

	CDBG
White	3,106
Black or African American	76
Asian	300
American Indian or American Native	28
Native Hawaiian or Other Pacific Islander	16
<b>Total</b>	<b>3,526</b>
Hispanic	1,718
Not Hispanic	1,808

Table 2 – Table of assistance to racial and ethnic populations by source of funds

### Narrative

According to the U.S. Census Bureau, most Lake Forest residents are racially White – 63.3% (2020 American Community Survey 5-Year Estimates). This same data source reports that 18.1% of City residents are Asian, and 25.6% of the City’s population is Hispanic/Latino – these are the City’s most prominent minority populations.

Based on the data from Table 2, 88% of CDBG program participants were White; nearly half of these individuals reported to be ethnically Hispanic/Latino (48.7%). A closer examination of the accomplishment data from individual activities provides added insight. Among homeless and safety net programs such as housing, food, and medical services, most clients served are lower-income Hispanic/Latino households. This data indicates that these households may be economically unstable and therefore seek assistance to stabilize their living situation.

Accomplishment data provided for CDBG and CDBG-CV-funded activities also indicates that most program participants are extremely low-income Lake Forest residents (i.e., individuals with a household income equal to or less than 30% of the County median income). During the FY 2023-24 reporting period, 55.3% of CDBG-funded program beneficiaries were extremely low-income.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$520,784.00	\$795,140.57

Table 3 - Resources Made Available

### Narrative

According to the City's 2023-2024 Annual Action Plan, the City anticipated utilizing \$520,784 in CDBG program resources to address community needs during the reporting period; however, the City received \$149,653.62 in program income during the reporting period. As reported in Table 3, the City expended \$795,140.57 in CDBG funds, including program income, during the FY 2023-2024 reporting period.

IDIS Program Report PR26 (Attachment 1) provides a detailed summary of CDBG and CDBG-CV expenditures for the reporting period.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG TARGET AREAS	0	41	Park and Sidewalk Projects
Citywide	100	59	Citywide

Table 4 – Identify the geographic distribution and location of investments

### Narrative

As reported in Table 4, the City utilized 93% of CDBG funds to address the needs of lower-income Lake Forest residents on a citywide basis. A small percentage of CDBG funds was spent on infrastructure projects which are located within the City's CDBG Target Area. Attachment 2 provides a map of the City's CDBG Target Areas. All CDBG-CV funds were spent on a citywide basis.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The City of Lake Forest made every effort to leverage CDBG funds to the greatest extent possible. Unlike prior years, no additional resources were used to leverage CDBG funds during the reporting period. There is no match requirement for the CDBG (and CDBG-CV) program.

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	11	14
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>11</b>	<b>14</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	11	14
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>11</b>	<b>14</b>

Table 6 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

Despite the challenges of the COVID-19 pandemic, the City exceeded planned housing rehabilitation program goals for the reporting period. The FY 2023-2024 Annual Action Plan established a one-year goal to rehabilitate 11 owner-occupied housing units, program staff assisted with rehabilitating 14 units. OCHA assisted fewer Lake Forest households with rental assistance than anticipated. The City expected OCHA

would assist 200 households during the reporting period – 169 households were assisted. (Note: The number of households assisted by OCHA is based on several factors out of the City’s control.)

**Discuss how these outcomes will impact future annual action plans.**

Even though program staff exceeded planned housing rehabilitation goals during the report period, the program may face future challenges:

1. Increase in mortgage interest rates and home sales prices:

- The City received less Revolving Loan income (i.e., program income) in FY 2023-2024 compared to recent years. Revolving Loan revenue is generated by the repayment of prior CDBG funded housing rehabilitation loans. A decrease in this funding source and anticipated reductions in future CDBG allocations may reduce the amount of future resources supporting housing rehabilitation activity.
- Recent press reports indicate that rising mortgage interest rates and home prices have led many homeowners to choose to rehabilitate their existing homes versus upgrading to a new home. This scenario may increase demand for limited CDBG funds allocated for housing rehabilitation.

2. Contractor capacity and supply chain issues:

- The COVID-19 pandemic and other global events have stressed supply chain issues across multiple industries. Contractors have reported challenges in obtaining materials such as lumber, concrete, and fixtures, resulting in delays in the beginning and completion of rehabilitation projects. Contractors also reported sharp increases in the price of materials.
- Housing Rehabilitation Program staff reports that contractors are very busy; subsequently, contractors are not responding to program bid solicitations or requesting additional time to begin and complete projects.
- In response to the cost of rehabilitation, the City will consider increasing the current maximum housing rehabilitation loan amount from \$30,000 to \$50,000. It is important to note that an increase in the maximum loan may limit the number of future program participants if sufficient funding is not available.

Approximately 5% of the City’s housing stock are mobile homes; however, many coach owners are lower-income residents with limited sources of income (e.g., social security, disability, pension). This cohort of homeowners will likely continue to seek City assistance to rehabilitate their homes (e.g., 9 of the 14

housing units rehabilitated during the FY 2023-2024 reporting period are mobile homes). The number of contractors specializing in mobile home rehabilitation is limited. In response to this challenge, the City will continue to appeal to new contractors to participate in the program, including efforts to attract additional minority and women contractors.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	3	0
Low-income	4	0
Moderate-income	7	0
<b>Total</b>	<b>14</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

Table 7 provides information regarding the households that received housing rehabilitation assistance during FY 2023-2024. OCHA reports that 169 Lake Forest very low-income and extremely low-income renter households received rental assistance during the FY 2023-2024 reporting period. The City is not a recipient of HOME funds.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

During FY 2023-2024 Lake Forest did not allocate CDBG funds for homeless outreach. Mercy House provided outreach and engagement services to chronic homeless with an Orange County Sheriff Homeless Liaison Officer's support. Mercy House was funded with non-HUD resources.

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

During the FY 2023-2024 reporting period, the City did not fund emergency shelter or transitional housing programs.

### **Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The City's homeless strategy delineated in the Consolidated Plan calls for providing safety net services that help prevent individuals and families from becoming homeless. To this end, during the FY 2023-2024 reporting period, CDBG funding was allocated to Families Forward, Family Assistance Ministries, and South County Outreach to assist households at risk of becoming homeless. Cumulatively, these three agencies provided rent, utility, and food assistance to 80 lower-income Lake Forest residents during the reporting period. An additional 116 lower-income Lake Forest residents were assisted with rent/utility assistance during the reporting period with FY 2023-2024 CDBG funds.

The City also allocated CDBG-CV funds to three agencies, which provided rent, utility, and food assistance to households impacted by the COVID-19 pandemic. Cumulatively, these agencies assisted 85 individuals during the reporting period.

**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**

As recently as FY 2023-2024, the City utilized local funds (former redevelopment resources) to acquire residential properties for permanent affordable housing. Families Forward operates these units as permanent, affordable housing for lower-income households, and these units will remain affordable for lower-income households for a minimum of 55 years. The City did not undertake a similar activity during the FY 2023-2024 reporting period; however, OCHA reports that 161 Lake Forest households were assisted with rental subsidies during the reporting period. This figure includes five disabled Lake Forest homeless households (benefitting from Continuum of Care Program Permanent Supportive Housing Certificates) and 18 homeless, disabled veteran households that benefitted from Veterans Affairs Supportive Housing (VASH) vouchers.



**CR-30 - Public Housing 91.220(h); 91.320(j)**

**Actions taken to address the needs of public housing**

The City of Lake Forest does not own or manage public housing.

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

Not applicable.

**Actions taken to provide assistance to troubled PHAs**

Not applicable.

### **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken 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. 91.220 (j); 91.320 (i)**

The FY 2023-2024 Annual Action Plan indicated that the City would address affordable housing barriers by providing resources to assist social service agencies that provide fair housing counseling and housing referral services for low- and moderate-income and special needs populations. During FY 2023-2024, the City provided funds to the Fair Housing Council of Orange County (“FHCO”). Services provided by FHCO included outreach, education, and fair housing enforcement. A total of 101 households were assisted during the reporting period addressing 284 issues and disputes related to rental agreements, notices, security deposits, unit habitability, and more. FHCO reports one housing discrimination complaint was received from a Lake Forest resident during the year; however, the issue was resolved through counseling.

The Consolidated Plan and Annual Action Plan also indicated barriers to affordable housing development would be addressed by considering ways to reduce development fees and expedite the entitlement review process. As previously outlined, the City has provided various subsidies to create new affordable housing opportunities for lower-income households. No affordable housing development was completed during FY 2023-2024.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

The City recognizes that special needs populations face challenges due to low income and their particular life situation. Special needs populations (e.g., the disabled and homeless) often require housing accommodations and supportive services. The City prioritizes supportive services and housing for special needs populations. During FY 2023-2024, the City funded several public service agencies that provide a social safety net to help at-risk households. These services include free or reduced-cost food, healthcare, and daycare services. Alzheimer’s Orange County and Vocational Visions provided services to 48 (21 and 27 respectively) disabled Lake Forest residents. As outlined in section CR-25 - Homeless and Other Special Needs, several nonprofit partners provided supportive services to the homeless and those at risk of becoming homeless.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 (Title X) changed the federal approach to addressing LBP by emphasizing preventing childhood lead poisoning through housing-based strategies. The City considers lead-based paint hazard reduction as an eligible activity in the City's Housing Rehabilitation Programs. All application packets for the City's Housing Rehabilitation Programs include a notice to educate residents about the health dangers of lead and encourage screening children for elevated blood-lead levels. Additionally, before federal funds are used for housing rehabilitation, all units are screened for lead-based paint hazards. Housing units identified with lead-based paint are treated, so paint hazards are abated per federal requirements. The use of lead-based paint has been prohibited since 1978. All housing units rehabilitated during FY 2023-2024 met an exemption allowed under HUD lead-based paint program regulations.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

According to data from the U.S. Census Bureau (2021: American Community Survey 5-Year Estimates – Table S1701), approximately 10.4% of Lake Forest residents have incomes below poverty. Specifically, 14.6% of City residents aged 65 and older and 7.1% of children under 18 have a household income below poverty. The Consolidated Plan and Annual Action Plan indicated that the City would support social services and housing activities for households living below the poverty line. During the FY 2023-2024 reporting period, low-income seniors were assisted with CDBG-funded in-home support and case management services; these services were provided for free. The City also provided funding to Alzheimer's Orange County, which provided daycare services for seniors with Alzheimer's, dementia, or disabilities. The program offers various medical, therapeutic, and social services for low-income seniors. Recognizing that poverty-level households may need assistance affording food and health care, the City also provided financial assistance to nonprofits that provide primary health care and food bank services. Service providers also offered clients career counseling and computer training to help them develop the skills and knowledge necessary for today's workplace. In response to the economic impacts of the COVID-19 pandemic, the City provided significant CDBG-CV resources to help lower-income households maintain housing and utility services. According to FY 2023-2024 program accomplishment data, 81.2% of CDBG-CV-funded program beneficiaries are extremely low-income individuals.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

During FY 2023-2024, the City continued efforts to eliminate institutional gaps and enhance program coordination with all community segments. For example, the City partnered with nonprofit entities to deliver public services. City departments also continued to collaborate to evaluate projects funded in whole or in part with CDBG funds that address priority needs. The City assisted OCHA by participating in the Cities Advisory Committee – a quarterly meeting of municipal and OCHA staff to discuss federal rental housing assistance and regional housing issues. The City also provided critical information and support for the regional Continuum of Care (CoC) as it prepares the County’s CoC Homeless Assistance grant application for HUD consideration. The City also supported efforts to develop the County’s Ten-Year Plan to end chronic homelessness and a regional discharge plan. Finally, the City coordinated with other Orange County grantees to prepare the 2020-2024 Orange County Analysis of Impediments to Fair Housing for a new five-year cycle.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

As indicated above, the City participated in regional coordination of services by participating in the quarterly Cities Advisory Committee held by OCHA to discuss federal rental housing assistance and as a member of the Orange County CoC Forum. The City has partnered with local nonprofit housing providers to expand affordable housing opportunities for lower-income households in the past years.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

Consolidated Plan regulations require CDBG recipients to (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choice for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin; (4) promote housing that is accessible to and usable by persons with disabilities; and (5) comply with the non-discrimination requirements of the Fair Housing Act. HUD encourages jurisdictions to consult with one another and initiate countywide fair housing planning. The Analysis of Impediments to Fair Housing Choice (AI) is the primary document for this purpose. Consistent with HUD’s directive, the City partnered with 19 Orange County jurisdictions to prepare a countywide AI. The AI provides an overview of fair housing impediments throughout Orange County, including Lake Forest. The AI also includes an action plan to address regional and local fair housing

impediments. Attachment 3 summarizes the steps the City and the Fair Housing Council of Orange County took to address fair housing impediments during FY 2023-2024.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City's CDBG monitoring program is designed to provide program staff with information necessary to ensure that sub-recipients are carrying out individual activities as described in their contracts, and ensure sub-recipients use appropriate accounting and record-keeping methods as it relates to the use of CDBG funds. Program policies ensure sub-recipients receive training regarding CDBG grant management, including the following topics: 1) review CDBG program goals, objectives, and sub-recipient obligations; 2) review the content of the sub-recipient agreements; and 3) review regulations related to the CDBG program that impact sub-recipients and the implementation of their programs. On-site monitoring of sub-recipients is conducted biennially unless a program or administrative issues are identified, or the grant recipient is new to CDBG. The City conducted on-site monitoring during the FY 2023-24 reporting period. In general, sub-recipients are complying with program requirements. Some programs did not meet planned performance goals. On-site monitoring will be scheduled for FY 2024-25. During the reporting period, program staff worked closely with City departments to ensure CDBG program regulations and other federal requirements were implemented. City departments and public service grant sub-recipients submitted accomplishment reports. Sub-recipients are required to provide documentation to support CDBG reimbursement requests. The City also made every effort to comply with all CDBG and Consolidated Plan regulations. The City's Citizen Participation Plan ensures that community input is considered before submitting a substantial amendment or an annual update to HUD. It also allows residents to review and comment on yearly performance. Construction, professional service, and sub-recipient agreements have been prepared to ensure compliance with applicable federal regulations. Additionally, the City has implemented an open procurement process that encourages bidding from minority and women-owned businesses.

## **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The City published a notice in the Saddleback Valley News on September 5, 2024, announcing a 15-day public comment period and City Council meeting to encourage resident participation. The FY 2023-2024 CAPER was available for public review and comment from September 3, 2024, through September

18, 2024, online and at Lake Forest City Hall, located at 100 Civic Center. The Lake Forest City Council accepted additional public comments at its September 17, 2024, meeting. A copy of this notice and a summary of public comments is provided in Attachment 4.

### **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

No FY 2023-2024 Annual Action Plan changes were undertaken during the reporting period; however, on June 24, 2024 \$33,000 of unexpended carry over funds were reallocated from the ADA Curb Ramps Phase 14 project to the Affordable Housing Project.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

### CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Total Number of Activities	4	0	0	0	0
Total Labor Hours	1,607				
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

**Table 8 – Total Labor Hours**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					



Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.					

**Table 9 – Qualitative Efforts - Number of Activities by Program**

**Narrative**

Three prior year public infrastructure/facility improvement projects were underway during the FY 2023-2024 report period: The Accessible Pedestrian Signal (APS) Phase 3 Project, the El Toro Park Project, the ADA Ramps Phase 13 and 14 projects that provided for the construction of ADA-compliant sidewalk curb ramps. In addition, the Senior Patio Covering Project was undertaken. Tables 8 and 9 above illustrate related Section 3 data, which is broken down as follows:

- APS Phase 3 Project: 77 hours of labor
- El Toro Park: 42 hours of labor
- ADA Ramps Phase 13 and 14: 638.5 and 849.5 respective hours of labor
- Senior Patio Covering Project: hours of labor

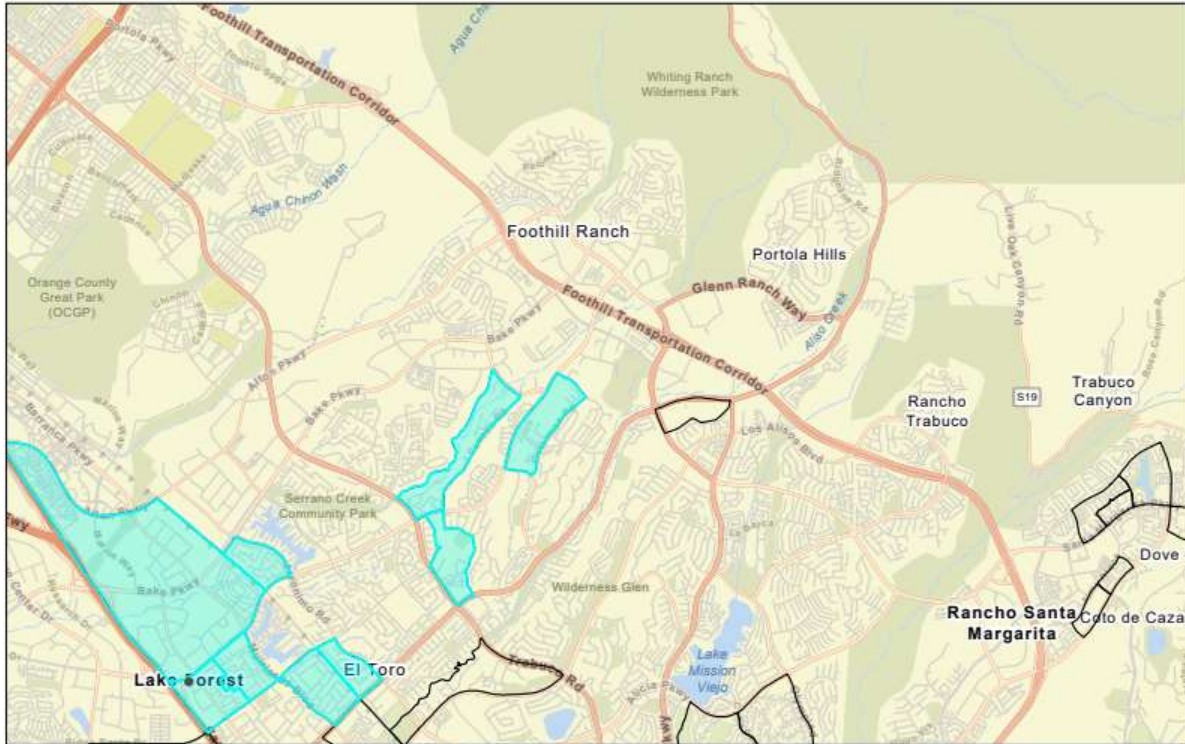
## **Attachment 1: IDIS Program Reports**

### *CDBG & CV*

- *PR03 - CDBG Activity Summary Report (GPR)*
- *PR23 – Summary of Accomplishments Report*
- *PR26 – CDBG Financial Summary Report (CDBG and CV)*
  
- *PR01 – HUD Grants and Program Income*
- *PR02 – List of Activities by Program Year and Project*
- *PR05 – Drawdown Report by Project and Activity*
- *PR09 – Program Income Details by Fiscal Year and Program*

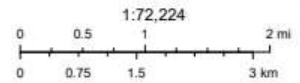
# Attachment 2: Map of CDBG-eligible Census Tract Block Groups

Low- and Moderate-Income Data, based on 2011-2015 ACS 5-year Estimates



7/27/2023, 11:28:16 AM

LMISD by Block Group



County of Los Angeles, County of Riverside, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METINASA, USGS, U.S. Department of Housing and Urban Development, Web AppBuilder for

County of Los Angeles, County of Riverside, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METINASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA |

**Attachment 3: Summary of Fair Housing Impediments and Actions to Address Impediments**

## Analysis of Impediments to Fair Housing Summary

PROPOSED AI GOALS AND STRATEGIES	FY 2023-24 ACCOMPLISHMENTS
<p>1) In collaboration with the OCHA:</p> <ul style="list-style-type: none"> <li>a) Attend quarterly Orange County Housing Authority (OCHA) Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.</li> <li>b) Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.</li> <li>c) In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.</li> </ul>	<ul style="list-style-type: none"> <li>a) City staff attended quarterly online meetings.</li> <li>b) The City provided the PHA Plan certifications to OCHA staff upon request.</li> <li>c) California law expanded "source of income" protections to individuals who use housing rent assistance (e.g., Housing Choice Voucher) effective January 2020. FHCOC did not identify any notices in Craigslist postings containing discriminatory language, including improper references to "older adults," restrictions regarding children under 18, and the use of rental assistance. FHCOC did respond to complaints of "refusal to accept housing assistance" on other platforms. FHCOC contacted the individuals posting these ads to remove the discriminatory content when possible.</li> </ul>
<p>2) Through the City's fair housing contractor:</p> <ul style="list-style-type: none"> <li>a) Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.</li> <li>b) Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.</li> <li>c) Provide general fair housing counseling and referrals services to address tenant-landlord issues and investigate</li> </ul>	<ul style="list-style-type: none"> <li>a) Regionally, FHCOC received 14 inquiries regarding reasonable accommodations and modifications - 1 arose from Lake Forest. Overall, 6 of the 14 clients received a reasonable accommodation, 2 clients did not follow through in process, 1 client's request was deemed not implementable, and the outcome for 5 others, including 1 modification request, were pending at the end of the program year.</li> <li>b) During FY 23-24, 17 regional training sessions for rental property owners/managers. Additionally, FHCOC presented 2 virtual fair housing seminars for housing providers in partnership with the Apartment Association of Orange County. FHCOC also conducted or participated in 13 virtual and 49 in-person regional virtual education or outreach activities, at which participants were made aware of fair housing laws and counseling services. While most information sessions limited participation to online platforms, all activities were available to Lake Forest residents.</li> <li>c) On a regional basis, FHCOC addressed 93 allegations of housing discrimination – 37 cases were opened for further investigation. 3</li> </ul>

<p>allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.</p> <p>d) Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.</p> <p>e) Include testing/audits within the scope of work with fair housing provider.</p> <p>f) Regularly consult with the City's fair housing contractor on potential strategies for affirmatively furthering fair housing on an on-going basis.</p>	<p>allegations arose from Lake Forest and 2 cases involved housing in Lake Forest. With respect to landlord/tenant issues, on a regional basis, FHCOC assisted 3,133 unduplicated households by addressing 11,021 fair housing issues, disputes, and inquires - 101 unduplicated households involving 363 issues, disputes, or inquiries were from Lake Forest.</p> <p>d) FHCOC monitored Craigslist for discriminatory content. Discriminatory ads were flagged, and if an investigation was feasible, the ad was referred to FHCOC's investigators for enforcement action. Other online rental advertising sites (e.g., OC Register, LA Times, Zillow) were sporadically monitored; the lack of an efficient text search function on these sites made monitoring less practical. The most common problematic postings indicated restrictions regarding children under 18 or improper preference for seniors. Overt racial or national origin discrimination was not observed.</p> <p>e) FHCOC also conducted 121 paired telephonic, systemic tests for discriminatory rental housing practices on a regional basis. An additional 13 paired systemic tests of real estate agents and 10 paired systemic pre-application tests of lenders were conducted telephonically. 3 systemic tests involved locations in Lake Forest.</p> <p>f) In FY 20-21, City staff discussed programming strategies with FHCOC regarding education and enforcement activity related to the COVID-19 pandemic eviction moratorium.</p>
<p>3) In cooperation with the Orange County Transportation Authority:</p> <p>a) Provide community education regarding transport services for persons with disabilities.</p> <p>b) Explore bus route options to ensure neighborhoods with a concentration of low-income or protected class populations have access to transportation services.</p>	<p>a) No activity to report for FY 2023-24</p> <p>b) No activity to report for FY 2023-24</p>
<p>4) Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).</p>	<p>▪ The City used both CDBG and CDBG-CV funds to support services to prevent the loss of housing due to COVID-19.</p>
<p>5) Prepare a new Housing Element that complies with all current State laws and is certified by the California Department of Housing and Community Development.</p>	<p>▪ The City Council approved the 2021-2029 Housing Element on January 3, 2023.</p>

	<ul style="list-style-type: none"> <li>▪ CA HCD certified the City’s 2021-2029 Housing Element on February 24, 2023.</li> </ul>
<p>6) Update zoning ordinance to comply with current State law.</p>	<ul style="list-style-type: none"> <li>▪ The City revised its Accessory Dwelling Unit (ADU) regulations to comply with current State law during FY 21-22. In August 2022, the City Council approved an update to the ADU ordinance to ensure consistency with State law and guidance from HCD. In addition, in August 2022, the City Council approved a Zoning Code amendment that created new mixed-use zoning districts that provide for consistency with mixed-use land use designations recently established (2020) in the General Plan.</li> </ul>

## **Attachment 4: Proof of Publication and Public Comments**



Saddleback Valley News  
1920 Main St, Suite 225  
Irvine, California 92614  
(714) 796-2209

See Proof on Next Page

100 CIVIC CENTER DR, ATTN: CITY CLERK  
LAKE FOREST, California 92630

**AFFIDAVIT OF PUBLICATION**

**STATE OF CALIFORNIA**

**County of Orange County**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the Saddleback Valley News, a newspaper that has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange County, State of California, on December 7, 1976, Case No. A-86742 in and for the City of Irvine, County of Orange County, State of California; that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

**09/05/2024**

I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Anaheim, Orange County, California, on  
Date: Sep 5, 2024.

  
\_\_\_\_\_  
Signature



**PUBLIC NOTICE  
PUBLIC REVIEW PERIOD AND  
PUBLIC HEARING TO BE HELD BY  
THE CITY OF LAKE FOREST CITY COUNCIL**

**CDBG CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT  
FOR THE PERIOD OF JULY 1, 2023 THROUGH JUNE 30, 2024**

**NOTICE IS HEREBY GIVEN:** The City of Lake Forest has completed its draft Consolidated Annual Performance Evaluation Report ("CAPER") for Program Year 2023/2024. The CAPER describes the use of Community Development Block Grant (CDBG) and Community Development Block Grant-Coronavirus (CDBG-CV) funds received from the U.S. Department of Housing and Urban Development (HUD) and expended by the City of Lake Forest between July 1, 2023 and June 30, 2024 (Program Year 2023/2024).

Specifically, CDBG funds were expended for the following activities:

Social Services - Housing Rehabilitation Programs  
Program Administration and Fair Housing - Public Infrastructure and Facility  
Advocacy - Improvements  
COVID-related Assistance - COVID-related facility improvements

All activities undertaken by the City are consistent with HUD national program objectives of providing decent housing, fair housing opportunities, public services, and other community development activities that primarily benefit low- and moderate-income persons. CDBG-CV funds have been used to prevent, prepare for, or respond to local impacts of the Coronavirus pandemic.

All persons interested in reviewing the draft 2023/2024 CAPER may do so from September 3, 2024 through September 18, 2024, online at [www.lakeforestca.gov/854](http://www.lakeforestca.gov/854) Community-Development-Block-Grant or at Lake Forest City Hall, located at 100 Civic Center Drive, during regular business hours. Written comments or requests for additional information should be directed to Adrian Orsola, Economic Development/Housing Manager, 100 Civic Center Drive, Lake Forest, CA 92630, or [adorsola@lakeforestca.gov](mailto:adorsola@lakeforestca.gov) by 4:00 PM September 18, 2024.

**NOTICE IS FURTHER GIVEN:** The City Council will hold a Public Hearing to consider the draft CAPER.

Hearing Date: September 17, 2024  
Hearing Time: 6:30 PM  
Hearing Location: City of Lake Forest City Council Chambers  
100 Civic Center Drive, Lake Forest, CA

**Environmental Documentation:** The activity is not subject to the California Environmental Quality Act ("CEQA") pursuant to Sections 15068(c)(2) because the activity, which involves approval of an annual report, will not result in a direct or reasonably foreseeable indirect physical change in the environment; and 15068(c)(3) because the activity is not a project as defined in Section 15378 of the CEQA Guidelines, California Code of Regulations, Title 14, Chapter 3, because it has no potential for resulting in physical change to the environment, directly or indirectly.

All persons either favoring or opposing this proposal are invited to present their views before or at this hearing. It is requested that any supportive documents and/or written comments be submitted prior to the public hearing.

**Agenda on the Internet:** The meeting Agenda will be available on the City website at <https://lakeforestca.gov/129/Agendas>. You can access the document on the Friday before the meeting. The meeting will also be livestreamed on the City website.

**Agenda Document Review:** The full Agenda including all back up information will be available at City Hall, 100 Civic Center Drive, Lake Forest, California, on the Friday before the meeting.

**Agenda Description:** The Agenda descriptions are intended to give notice to members of the public of a general summary of items of business to be transacted or discussed. The listed Recommended Action represents the City staff's recommendation. The City Council may take any action which it deems to be appropriate on the agenda item and is not limited in any way by the recommended action.

**Public Comment prior to meeting:** Members of the public may submit email comments to [council@lakeforestca.gov](mailto:council@lakeforestca.gov). Email comments will be uploaded to the agenda packet and made part of the official public record of the meeting and will not be read at the meeting. To ensure staff reviews all comments prior to the City Council meeting, please submit email comments no later than 5:00 p.m. the day of the meeting.

**Public Comment of meeting:** Members of the public may provide in-person, verbal comments for any item during the meeting. Those wishing to provide comments will be asked to fill out a speaker card and provide it to the City Clerk prior to the commencement of the meeting.

Any petition for judicial review of a decision of the Lake Forest City Council is controlled by the statute of limitations provisions set forth in Sections 2.50.010 and 2.50.020 of the Lake Forest Municipal Code ("LFMC") and Sections 1094.5 and 1094.6 of the California Code of Civil Procedure. Any action or proceeding to attack, review,

set aside, or void any decision of the Lake Forest City Council is controlled by Section 2.50.010 and Section 2.50.020 of the LFWC.

Any such action or proceeding that seeks judicial review of, attacks, or seeks to set aside or void any decision of the Lake Forest City Council shall be limited to those issues raised at the hearing described in this notice or in written correspondence delivered to the City Clerk, on or prior to, the public hearing described in this notice, and must be commenced within the time limits specified in Chapter 2.50 of the LFWC.

**WHO TO CONTACT FOR INFORMATION** - For additional information, please contact Adrian Ortalva, at (949) 461-3449 or via e-mail at [aortalva@lakeforestca.gov](mailto:aortalva@lakeforestca.gov)

If you need special assistance to participate in this meeting, please contact the City Clerk at (949) 461-3400. Notification of least 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting.

/s/ Lisa Berglund, MPA  
City Clerk  
**Saddleback Valley News**  
Published: 9/5/24

No Comments were received.