



City of Garden Grove

2020-2025 Consolidated Plan

FY 2020-2021 Action Plan

March 27, 2020 Public Review Draft

Table of Contents

Executive Summary	4
ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	4
The Process	9
PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)	9
PR-10 Consultation - 91.100, 91.200(b), 91.215(l)	12
PR-15 Citizen Participation	19
Needs Assessment	20
NA-05 Overview	20
NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)	22
NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b) (2)	33
NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b) (2)	38
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b) (2)	44
NA-30 Disproportionately Greater Need: Discussion – 91.205(b) (2)	46
NA-40 Homeless Needs Assessment – 91.205(c)	55
NA-45 Non-Homeless Special Needs Assessment - 91.205 (b, d)	62
NA-50 Non-Housing Community Development Needs – 91.215 (f)	68
MA-05 Overview	69
MA-10 Number of Housing Units – 91.210(a)&(b)(2)	71
MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)	76
MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)	80
MA-25 Public and Assisted Housing – 91.210(b)	83
MA-30 Homeless Facilities and Services – 91.210(c)	85
MA-35 Special Needs Facilities and Services – 91.210(d)	91
MA-40 Barriers to Affordable Housing – 91.210(e)	94
MA-45 Non-Housing Community Development Assets – 91.215 (f)	96
MA-50 Needs and Market Analysis Discussion	106
Strategic Plan	109

SP-05 Overview.....	109
SP-10 Geographic Priorities – 91.215 (a)(1)	111
SP-25 Priority Needs - 91.215(a)(2)	112
SP-30 Influence of Market Conditions – 91.215 (b).....	123
SP-50 Public Housing Accessibility and Involvement – 91.215(c).....	140
SP-55 Barriers to affordable housing – 91.215(h)	141
SP-60 Homelessness Strategy – 91.215(d)	144
SP-65 Lead based paint Hazards – 91.215(i).....	148
SP-70 Anti-Poverty Strategy – 91.215(j).....	150
SP-80 Monitoring – 91.230	152
<i>Expected Resources</i>	<i>154</i>
AP-15 Expected Resources – 91.220(c)(1,2)	154
<i>Annual Goals and Objectives.....</i>	<i>160</i>
Projects.....	160
AP-35 Projects – 91.220(d).....	163
AP-38 Project Summary	165
AP-50 Geographic Distribution – 91.220(f)	172
<i>Affordable Housing</i>	<i>173</i>
AP-55 Affordable Housing – 91.220(g)	173
AP-60 Public Housing – 91.220(h)	174
AP-65 Homeless and Other Special Needs Activities – 91.220(i).....	175
AP-75 Barriers to affordable housing – 91.220(j).....	181
AP-85 Other Actions – 91.220(k).....	184
<i>Program Specific Requirements.....</i>	<i>188</i>
<i>Appendix A.....</i>	<i>191</i>
<i>Appendix B.....</i>	<i>195</i>
<i>Appendix C.....</i>	<i>204</i>

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

The Consolidated Plan

The City of Garden Grove 2020-2025 Consolidated Plan is a planning document that identifies and develops a strategy to address critical housing and community development needs that can be addressed through federal funding sources, including Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grants (ESG). This Consolidated Plan was prepared using the eCon Planning Suite system developed by the U.S. Department of Housing and Urban Development (HUD). The system prescribes the structure and contents of this document, following HUD's Consolidated Planning regulations. The Consolidated Plan is comprised of the following major components:

- An assessment of housing and community development needs based on demographic and housing market information;
- Implementing strategies to address housing and community development needs;
- The Annual Action Plan outlining the City's intended uses of CDBG, ESG, and HOME funds for the upcoming fiscal year.

Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of lower-income. CDBG funds are relatively flexible and can be used for a wide range of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, acquisition of land and buildings, construction or rehabilitation of public facilities (including shelters for the homeless and infrastructure), removal of architectural barriers to housing needs, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses. The City of Garden Grove's estimated annual entitlement of CDBG funds is \$2,094,615.

HOME Investment Partnerships (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations. HOME funds can be used for activities that promote affordable rental housing and homeownership for low- and moderate-income households, including building acquisition, new construction and reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance. The City of Garden Grove's estimated annual entitlement of HOME funds is \$776,883.

Emergency Solutions Grant (ESG): The ESG program provides homeless persons with basic shelter and essential supportive services, including rehabilitating or remodeling a building used as a new shelter, operations, and maintenance of a homeless facility, essential supportive services, and homeless prevention. The City of Garden Grove's estimated annual allocation of ESG funds is approximately \$177,733.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment

Overview

The goals identified in this Consolidated Plan are based on the Needs Assessment and Community Survey, which are outlined below:

- I. Provide Decent and Affordable Housing
- II. Address the Needs of Homeless and Those At Risk
- III. Provide Community Services
- IV. Address Public Facilities and Infrastructure Needs
- V. Promote Economic Development and Employment
- VI. Provide for Planning and Administration Activities

These goals will be achieved through the implementation of actions associated with the following priority areas:

- **Increase, Improve, and Preserve Affordable Housing** - There will be continued provision of affordable housing for lower-income households due to the high cost of housing in Garden Grove. This will be done through acquisition/rehabilitation of rental units,

rehabilitation assistance to low-income homeowners, and reduction of substandard housing conditions, including addressing lead-based paint hazards.

- **Promote New Construction of Affordable Housing** - To help address the shortage of new affordable housing in the community, Garden Grove will promote and facilitate the new construction of affordable housing.
- **Provide Rental Assistance to Alleviate Cost Burden** - The Garden Grove Housing Authority administers the Section 8 Housing Choice Voucher program. To assist the need demonstrated by the 13,800-person waitlist, the City will continue to support a Tenant-Based Rental Assistance program.
- **Promote Programs to Meet Homeless Needs** - The ESG funds allocated to the City will be used to address the needs of homeless individuals and those at risk of homelessness. Garden Grove will also continue to participate in the Orange County Continuum of Care System for the Homeless.
- **Preserve and Improve Existing Supportive Services** - The preservation and improvement of existing community supportive services for special needs groups will be a priority area, especially for special needs groups including seniors, lower-income households, and youth. Anti-crime and safety programs will also be implemented to improve general safety and well being.
- **Address Public Facilities/Infrastructure Needs** - Public facilities and infrastructure improvements will be addressed through Garden Grove's Capital Improvement Program. The City will help support improvements to public facilities and infrastructure in income-eligible areas.
- **Promote Economic Development and Employment** = Economic development and employment opportunities will be supported through various programs that will stimulate economic growth and vitality in the City.
- **Provide for Necessary Planning and Administration** - Planning and Administration activities to address housing and community development needs will be prioritized to allow effective service provision to city residents. Implementation of the goals and objectives of the Consolidated Plan will continue to be in compliance with the CDBG, HOME, and ESG program regulations and requirements.

- **Fair Housing** - There will also be continued compliance with fair housing planning requirements (Analysis of Impediments to Fair Housing Choice) and incorporate actions in the annual Action Plan.

3. Evaluation of past performance

During the 2015-2020 Consolidated Plan period, targeted the use of CDBG, HOME, and ESG funds in four primary areas:

1. Development of decent and affordable housing
2. Provision of community and supportive services
3. Improvement of public facilities and infrastructure
4. Expansion of economic opportunities and anti-poverty activities

The City of Garden Grove allocated the following resources to meet the goals and objectives of the Consolidated Plan during the 2015-2020 periods:

2015 - 2,620,846

2016 - 4,001,355

2017- 2,591,627

2018- 3,913,983

2019- 3,040,207

The performance of programs and systems are evaluated on a regular basis through Consolidated Annual Performance and Evaluation Reports (CAPERs). A more detailed summary of the City's evaluation of past performance in previous CAPERs can be viewed on the City's website at <https://ggcity.org/neighborhood-improvement>.

4. Summary of citizen participation process and consultation process

The City of Garden Grove provided public notice on Friday, August 23, 2019, through a press release inviting the residents of Garden Grove to add their input towards this Consolidated Planning process. The Survey was made available through the City of Garden Grove Website in English, Spanish and Vietnamese. The survey was also made available during community workshops. The Housing and Community Needs public workshops were announced for the public to give their views on the Consolidated Plan. The workshops were held on Wednesday, September 18, 2019, 6:30 p.m., at Bolsa Grande High School's cafeteria, 9401 Westminster Avenue, and on Thursday, October 17, 2019, 6:30 p.m., at the Garden Grove Community

Meeting Center 'A' Room, 11300 Stanford Avenue. The Bolsa Grande High School Cafeteria and the Garden Grove Community Meeting Center are accessible to those who are physically disabled and meet the American with Disability Act requirements.

The draft plan was made available for public review from **March 23, 2020 to April 28, 2020**. A public hearing is scheduled and is planned to be held with the Neighborhood Improvement and Conservation Commission on April 13, 2020 to gather community views on the draft plan. Another public hearing is scheduled and will be held with the City Council on April 28, 2020 to gather additional community views on the draft plan. 8 people attended the workshops, and residents attended the public hearing to review the draft plan. There were 197 responses to the Survey.

5. Summary of public comments

Top priorities identified by the public include the following:

- Energy-efficient improvements for housing;
- Street/alley infrastructure improvements;
- Cleanup of abandoned lots and buildings;
- More anti-crime programs;
- Storefront improvements for businesses;
- Improvements for parks and recreation facilities; and
- Improved homeless shelters and services.

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

All views were accepted during the consultation process.

7. Summary

The City of Garden Grove has undertaken diligent and good faith efforts to outreach to all segments of the community that may benefit from CDBG, ESG, and HOME programs. The City of Garden Grove will continue to concentrate its resources for maximum impact and strive to address the needs, priorities, and goals identified in this 2020-2025 Consolidated Plan.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe 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
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The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

CDBG Administrator	CITY OF GARDEN GROVE	Community And Economic Development Department
HOME Administrator	CITY OF GARDEN GROVE	Community and Economic Development Department
ESG Administrator	CITY OF GARDEN GROVE	Community and Economic Development Department

Table 1 – Responsible Agencies

Narrative

The City of Garden Grove’s Community and Economic Development Department, Office of Economic Development, Neighborhood Improvement Unit administers the City’s CDBG, HOME, and ESG programs. Below is a summary of the Agency grants, according to the Department of Housing and Urban Development (HUD) exchange.

Community Development Block Grant (CDGB) - The CDBG is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended 42 U.S.C.-530.1 et seq. The Program provides annual grants to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income households. The funds are utilized for several community development projects, such as construction and improvement of public facilities and rehabilitation of housing and commercial buildings.

The HOME Investment Partnerships Program (HOME) - The program provides a wide range of activities, including building, acquisition, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income households. HOME is provided to states and localities that communities use - often in partnership with local nonprofit groups. It is the largest Federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.

The Emergency Solutions Grant (ESG) – The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grant Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. This Program addressed the needs of homeless people in emergency or transitional shelters to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and homelessness.

The Consolidated Plan

According to HUD, this is a planning document designed to help states and local jurisdictions assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. Per HUD guidelines, the identification of needs and the adoption of strategies to address those needs must focus primarily on low- and moderate-income individuals and households. The Consolidated Plan must also address “special needs” identified by the federal government or locally, such as the needs of the elderly, persons with disabilities, large families, single parents, homeless individuals and families, and persons with HIV/AIDS.

In compliance with the guidelines and regulations set forth by HUD, this Consolidated Plan covers the period beginning July 1, 2020, through June 30, 2025, spanning five program years. This Consolidated Plan includes the following components:

- An assessment of the housing and community development needs and market conditions;

- A strategy that establishes priorities for addressing the identified housing and community development needs; and
- A one-year Action Plan that outlines the intended use of resources

The Consolidated Plan is carried out through an Annual Action Plan, which provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER).

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Garden Grove implemented a comprehensive outreach program to seek community input in the development of this consolidated plan. Residents, program beneficiaries, agencies, service providers, non-profit organizations, and other city departments provided inputs required to create strategic development plans for the city's needs for the 2020-2025 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(l)).

There has been input by residents, service providers, non-profit organizations, religious institutions, other city departments, and other agencies through a community survey and public hearings. These views are incorporated into the Garden Grove 2020-2025 Consolidated Plan and its programs. A total of 159 stakeholders, including: public and assisted housing providers and developers; private and governmental agencies; and health, mental health and service agencies were directly contacted and invited to participate in the planning process for Garden Grove.t

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

The County of Orange Department of Housing and Community Services (HCS) coordinate the County Continuum of Care in response to the ongoing homeless needs in the region. A collaborative approach to addressing homelessness in Garden Grove dubbed United to End Homelessness was established in May 2019 uniting the five major sectors of the population: residents, businesses, non-profit organizations, faith-based groups and philanthropic organizations. The City of Garden Grove also participates in the Point in Time Survey that assesses the level of homelessness and an inventory of available local community resources to

address homelessness in the county. The Neighborhood Improvement and Conservation Commission is an advisory body to the City Council that promotes citizen awareness, involvement, and support for neighborhood improvement and preservation for the community.

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

The City of Garden Grove is one of five jurisdictions that receive ESG funds directly within the County of Orange. To this end, the city contributes to the countywide CoC providing funding to:

- Engage homeless individuals and families living on the street;
- Improve the number and quality of emergency shelters for homeless individuals and families;
- Help operate these shelters;
- Provide essential services to shelter residents;
- Rapidly re-house homeless individuals and families;
- Prevent families/individuals from becoming homeless.

The City allocates the resources to sub-recipients to rehabilitate and operate emergency and transitional shelters, provide essential social services, and prevent homelessness.

The City actively participates in the Orange County CoC by attending meetings to discuss how to establish performance measures that benefit the broader goals of the region. Garden Grove provides data for CoC surveys and relies heavily upon the CoC's research and discussions to identify and address critical gaps in local care for the homeless. In doing so, the City is able to meet homeless needs in the community through assistance to providers and programs that offer emergency/transitional housing or homeless prevention services.

The Orange County Coc is the Homeless Management and Information System (HMIS) lead agency, also referred to as Orange County HMIS. This organization administers the HMIS for the region and sets a uniform standard for all homeless and at-risk service providers and agencies to submit client-level and demographic data for HUD reporting and local homeless strategies. All ESG-funded organizations enter information to the Orange County HMIS system.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	211 ORANGE COUNTY
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy

<p>Briefly describe how the Agency/Group/Organization was Consulted. What are the anticipated outcomes of the consultation Or areas for improved coordination?</p>	<p>This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2020-2025 Consolidated Plan.</p>
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2	<p>Agency/Group/Organization</p>	<p>HELPING OTHERS PREPARE FOR ETERNITY</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Children Services-Victims of Domestic Violence Services-Health Services-Education Services-Employment</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>This organization provided direct input, helped to identify priority needs in the community and participated in a community workshop for the Garden Grove 2020-2025 Consolidated Plan.</p>
3	<p>Agency/Group/Organization</p>	<p>Garden Grove Community Arts Society</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Children</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Non-Homeless Special Needs</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>This organization provided direct input helped to identify priority needs in the community and participated in a community workshop for the Garden Grove 2020-2025 Consolidated Plan</p>
4	<p>Agency/Group/Organization</p>	<p>Illumination Foundation</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-homeless</p>

	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs - Chronically homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2020-2025 Consolidated Plan.
5	Agency/Group/Organization	Garden Grove United Methodist Church
	Agency/Group/Organization Type	Community Church
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization provided direct input helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2020-2025 Consolidated Plan.

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

No agency/ organization was left out of the consultation process.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	County of Orange	The Orange County Point-in-Time count provided homeless data for the Consolidated Plan. The Orange County Ten-Year Plan to End Homelessness Strategic Plan is closely aligned with the goals of the CoC. Garden Grove is an administering agency for CoC and ESG funds in addition to the City's CDBG and HOME allocations.
City of Garden Grove Housing Element (2014-2021)	City of Garden Grove Community and Economic Development Department	The Housing Element serves, as a policy guide to help the City meet existing and future housing needs. Both the Consolidated Plan and the Housing Element share common goals that address housing-related issues in the community.
Garden Grove Proposed Biennial Budget FY 2019-2020 and 2020-2021	City of Garden Grove Finance Department	The Consolidated Plan is aligned with the City's annual budgets. Finance prepares annual strategies and financing to fulfill the Action Plan and by extension the overall Consolidated Plan.
Economic Development Strategic Plan, 2018	City of Garden Grove Office of Economic Development	The City of Garden Grove’s 2018 Economic Development Strategic Plan (“EDSP”) is a baseline assessment of existing conditions that drive economic investment and outlines strategic recommendations to address the community’s economic issues and opportunities.

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

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City's Housing Authority coordinates its activities with the Orange County Housing Authority to provide affordable housing services. The Garden Grove Housing Authority has Memorandums of Understanding with service providers and developers who provide information on local needs and available housing. The Orange County Continuum of Care (CoC) coordinates strategies to offer assistance to homeless persons. The City of Garden Grove reached out to several public agencies to participate in the Consolidated Planning process.

Narrative (optional):

The summaries of the discussions are included in the appendices below.

PR-15 Citizen Participation

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 a core part of the Consolidated Plan process. This plan is developed through a collaborative process that involves City Staff, service providers, residents, and non-profit agencies. This section gives insight into the collaborative process that took place in the development of this plan. Public input was used to prioritize community needs in the Consolidated Plan. The following avenues were used to obtain public comments:

Consolidated Plan Survey - The City of Garden Grove gave public notice on Friday, August 23, 2019, through a press release inviting residents of Garden Grove to add their input towards the consolidated planning process. The Survey was made available through the City of Garden Grove’s website in English, Spanish, and Vietnamese. It was also made available during community workshops.

Community Workshops - In August 2019, the Housing and Community Needs Public Workshops were announced through a press release for the public to give their views on housing and community issues related to the Consolidated Plan. The workshops were held on Wednesday, September 18, 2019, at 6:30 p.m., at Bolsa Grande High School’s cafeteria, 9401 Westminster Avenue, and on Thursday, October 17, 2019, at 6:30 p.m., at the Garden Grove Community Meeting Center ‘A’ Room, 11300 Stanford Avenue.

Draft Consolidated Plan public review - March 23, 2020 - April 28, 2020

Public hearings to review the Consolidated Plan - April 13, 2020 (NICC) and April 28, 2020 (Council)

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)

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The needs assessment of housing in the city of Garden Grove will feature data collected in the census and demographic data to assess the housing challenges within the jurisdiction. This assessment assists with the prioritization of housing and community development programs and activities for the use of CDBG, ESG, and HOME funds over the next five years.

The following summary of key findings gives an overview of the needs assessment results, with more detail included in each corresponding section of the Needs Assessment.

NA - 10 Housing Needs

- 61% of Garden Grove households are lower income (0-80%) of the Area Median Income (AMI). Of these, 23% (10,580) are extremely low income (0-30% AMI), 17% (7880) are very low income (30-50% AMI), and 22% (10,515) are low income (50-80% AMI).
- Approximately 40% of Garden Grove households are cost-burdened, of which 62% (11,667) are renters and 37% (6,835) are homeowners paying more than 30% of their income towards housing costs.
- Severe housing problems (defined as lack of kitchen or complete plumbing, severe overcrowding, or severe cost burden) affect about 33% of households (15,300). Out of this number, 64% are extremely low-income households (5,560 renters and 1,910 homeowners).

NA - 15 Disproportionately Greater Need: Housing Problems and NA-20 Disproportionately Greater Need: Severe Housing Problems

- Extremely low-income households are most affected in the jurisdiction as a whole. At least one racial/ethnic group has a disproportionate share of housing problems within almost all income categories.

NA - 25 Disproportionately Greater Need: Housing Cost Burden

- A disproportionately greater need exists among households that have a cost burden of 50% or higher for the entire jurisdiction. At least one racial/ethnic group has a disproportionate share of housing cost burden within almost all income categories.

NA - 30 Disproportionately Greater Need: Discussion

- A summary of disproportionately greater need and housing cost burden is provided. Within nearly all income categories, Hispanic, African American, American Indian/Alaskan Native, and Pacific Islander households have experienced a disproportionate amount of housing problems and housing cost burdens.

NA - 35 Public Housing

- The Housing Choice Voucher Program (Section 8) currently serves approximately 2,200 lower-income households. The waiting list had 13,800 applicants as of February 2020.

NA - 40 Homeless Needs

- The 2019 Point-in-Time (PIT) homeless count found that 6,860 homeless persons were living in Orange County. Approximately 58% were unsheltered and living in a place not meant for human habitation.
- Countywide, 23% of homeless individuals are a member of a family, composed of both adults and children.

NA - 45 Non-Homeless Special Needs

- A brief analysis of groups in the population who have special housing needs and their characteristics.

NA - 50 Non-Housing Community Development Needs

- Needs and prioritization of public facilities and services.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The total household incomes are a vital indicator of how much of the population will require housing assistance. This section explores household characteristics and housing problems experienced by different income levels:

- 0-30% of AMI-Extremely Low Income;
- 30%-50% of AMI -Very Low Income;
- 50%-80% of AMI -Low Income;
- 80%-100% OF AMI -Moderate Income.

Demographics	Base Year: 2010	Most Recent Year: 2017	% Change
Population	170,794	174,812	1.2%
Households	46,037	47,536	2%
Median Income	\$61,026.00	\$62,675.00	1.3%

Table 5 - Housing Needs Assessment Demographics

Data Source:	2006-2010 ACS, 2010 census (Base Year), 2013-2017 ACS (Most Recent Year)
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Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	10,580	7,880	10,515	5,125	12,890

Small Family Households	4,120	3,750	4,985	2,480	6,959
Large Family Households	1,955	1,650	2,670	1,275	2,530
Household contains at least one person 62-74 years of age	2,120	1,850	2,330	1,230	3,109
Household contains at least one person age 75 or older	1,890	1,140	1,290	495	925
Households with one or more children 6 years old or younger	2,284	1,554	2,310	1,120	739

Table 6 - Total Households Table

Data Source:	2011-2015 CHAS
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Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	260	100	125	4	489	80	30	25	10	145
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	550	365	320	85	1,320	105	120	170	135	530
Overcrowded - With 1.01-1.5 people per room (and none of the above)	1,135	735	855	240	2,965	150	205	510	215	1,080

problems)											
Housing cost burden greater than 50% of income (and none of the above problems)	3,615	1,190	160	0	4,965	1,580	1,285	765	185		3,815
Housing cost burden greater than 30% of income (and none of the above problems)	655	1,570	1,765	225	4,215	350	490	1,665	870		3,375
Zero/negative Income (and none of the above problems)	475	0	0	0	475	165	0	0	0		165

Table 7 – Housing Problems Table

Data Source:	2011-2015 CHAS
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2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of the four housing problems	5,560	2,390	1,455	330	9,735	1,910	1,640	1,470	545	5,565
Having none of the four housing problems	1,620	1,990	3,275	1,375	8,260	855	1,860	4,315	2,875	9,905
Household has negative income, but none of the other housing problems	475	0	0	0	475	165	0	0	0	165

Table 8 – Housing Problems 2

Data Source:	2011-2015 CHAS
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3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total

NUMBER OF HOUSEHOLDS								
Small Related	2,785	1,895	1,170	5,850	635	1,015	1,470	3,120
Large Related	1,419	835	340	2,594	350	425	610	1,385
Elderly	1,434	395	174	2,003	830	460	390	1,680
Other	485	520	415	1,420	290	140	220	650
Total need by income	6,123	3,645	2,099	11,867	2,105	2,040	2,690	6,835

Table 9 – Cost Burden > 30%

Data Source:	2011-2015 CHAS
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4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,510	655	95	3,260	605	725	410	1,740
Large Related	1,209	255	0	1,464	315	290	155	760
Elderly	994	160	4	1,158	565	305	135	1,005
Other	440	300	55	795	250	125	110	485
Total need by income	5,153	1,370	154	6,677	1,735	1,445	810	3,990

Table 10 – Cost Burden > 50%

Data Source:	2011-2015 CHAS
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5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,610	905	880	180	3,575	230	160	350	205	945
Multiple, unrelated family households	105	235	320	135	795	45	165	350	145	705
Other, non-family households	0	0	15	14	29	0	0	0	0	0
Total need by income	1,715	1,140	1,215	329	4,399	275	325	700	350	1,650

Table 11 – Crowding Information – 1/2

Data Source:	2011-2015 CHAS
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	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Households with Children Present								

Describe the number and type of single-person households in need of housing assistance.

Subject	Total Occupied Units	Owner-occupied Units	Renter occupied units
1 person Household	7,146	3785	3361
15-34 years	728	259	469
35-64 years	3,019	1,584	1,435
65 and over	3,399	1,942	1,457

ACS estimates 2013-2017

There are a total of 47,536 occupied housing units based on the 2013-2017 ACS 5 year estimates. Approximately 15% of these housing units are single-person households. As illustrated in the table above, most of these households are owner-occupied with 1,942 belonging to seniors 65 years and over. Households require mortgage assistance, especially those that belong to lower-income households (0-80% AMI). Renter households may need rent subsidies such as housing vouchers also for the lower-income households. Also, they may both need to have accessibility features and rehabilitation assistance to maintain a good quality of housing stock. There may be a need for additional social services for persons under 18 years of age who live alone.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault, and stalking.

There were an estimated 14,626 persons with disabilities in the 2011-2015 ACS 5 year estimates, 75% of who were not in the labor force. This number rose to 16,817 in the 2013-2017 ACS estimates with 76% not in the labor force. Families in need of housing assistance who are disabled may have housing that lacks accessibility features including ramps, wide elevators and lower countertops, to name a few. They may also live in housing that has plumbing issues and those that lack kitchen facilities.

Families that are victims of domestic violence, dating violence, sexual assault, and stalking are most likely to need emergency housing, rapid-re-housing, or homeless prevention assistance as they may be hiding from their assailants. They are at risk of being homeless as a result of their experiences. There are 365 unsheltered and 185 sheltered homeless individuals as a result of domestic violence in Orange County. Some of them likely include the 225 homeless people recorded in Garden Grove in 2019

What are the most common housing problems?

Based on tables 9 and 10 above, the most common housing problems for both renters and owners is overpayment. This can be further broken down as follows:

1. Housing cost burden > 30% - 18,702 households

2. Housing cost burden > 50% - 10,667 households

Are any populations/household types more affected than others by these problems?

Table 8 illustrates the number of households that experience more than one housing problem in Garden Grove. Renter households are most affected at 9,735 households, 57% of which have a household income of 0-30% AMI. In comparison, both renter and owner households earning an income that is 50%-80% of the AMI have no housing problems. Given the data provided in table 7 above, households with a cost burden of 50% and no other housing problems were the highest at 4,965 for renter households. Extremely low-income households with 0-30% of the AMI were most affected at 72.8% of the households. For the owner households, the same income group (0-30% of the AMI) was most affected at a rate of 41.4%. Households with a cost burden of 30% and no other housing problem were also highest among renter households with a low income (50%-80% of AMI) at 41.9 % or 4215 households. Owner households in the same income category (50-80% of AMI) were also most affected at 3,375 (49.3%) households. Households that experienced overcrowding with 1.01-1.5 people per room were more prevalent among renters at 2,965. The income bracket most affected is the extremely low-income households (0-30% of AMI) at 38.3%. Owner households that were most affected by overcrowding were in the low-income bracket (50%-80% of the AMI), which represents 47.2% or 1,080 households.

Describe the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also, discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The individuals and families that are at the highest risk of homelessness are those that experience a housing cost burden of 50% or greater. This is evident for renter households with an extremely low income (0-30% of AMI), which is approximately 5,138 households, as illustrated in table 10. The numbers of individuals who are at risk of being homeless are even higher for elderly persons who have a fixed income and increased medical needs. The same can be said for persons with disabilities and families with members that are from either one or both

special needs groups. Large families that are also within the extremely low-income category are also at a very high risk of homelessness due to the higher cost of housing with more rooms. All this is further explored in NA 45, where special needs populations are examined in detail.

Formerly homeless families and individuals require access to healthcare and counseling services to secure income and permanent housing. They also require rental assistance through programs such as the City's Homeless Emergency Assistance Rental Transition (HEART) Program, which pays a portion of the household's rent and utility deposits. They also need access to economic programs that allow for skills building along with access to job boards and training that would allow them to rejoin the labor force and improve their standard of living.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Households (families and individuals) are considered to be "at-risk" when they have low and limited income and would need to spend 30% or more of their income on housing. In some cases, these households spend 50% or more of their income on housing. They will therefore become homeless if they experience any strain on their income, including loss of employment or other emergencies requiring financial reserves.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

High-cost burden and low incomes cause instability and an increased risk of homelessness. This is even more prominent for special needs groups that will be further discussed in NA 45 below.

Discussion

This section analyzed the relationship between incomes and housing problems. Notably, renter households suffer more housing problems than owner households. However, housing cost is the greatest challenge facing low-income households in this jurisdiction.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b) (2)

Assess the need for any racial or ethnic group that has a disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

According to the Federal Register as per the regulations at 91.205(b) (2), 91.305(b) (2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. A disproportionately greater need exists when the members of a racial or ethnic group, at a given income level, experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. The final column in red texts shows the calculation to determine if a disproportionately greater need exists.

Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provides information for the jurisdiction, as a whole that can be useful in describing overall needs. Disproportionate housing needs in a population are defined as having one or more of the following four housing problems in greater proportion than the jurisdiction as a whole: 1) living in housing that lacks complete kitchen facilities, 2) living in housing that lacks complete plumbing facilities, 3) more than one person per room (overcrowded), and 4) cost burden greater than 30% of the Area Median Income (AMI).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionately greater need
Jurisdiction as a whole	8,475	1,470	640	80.07%
White	1,440	390	200	70.94%
Black / African American	95	25	0	79.17%
Asian	3,745	825	290	77.06%
American Indian, Alaska Native	70	4	0	94.59%
Pacific Islander	35	0	0	100%
Hispanic	3,030	190	125	90.58%

Table 13 - Disproportionately Greater Need 0 - 30% AMI

Data Source:	2011-2015 CHAS
---------------------	----------------

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionately greater need
Jurisdiction as a whole	6,095	1,790	0	77.30%
White	1,030	745	0	58.03%
Black / African American	25	25	0	50%
Asian	2,435	555	0	81.44%
American Indian, Alaska Native	30	4	0	88.24%
Pacific Islander	50	0	0	100%
Hispanic	2,430	430	0	84.97%

Table 14 - Disproportionately Greater Need 30 - 50% AMI

Data Source:	2011-2015 CHAS
---------------------	----------------

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionately greater need
Jurisdiction as a whole	6,355	4,165	0	60.41%
White	1,420	1,635	0	46.48%
Black / African American	74	25	0	74.75%
Asian	2,490	1,150	0	68.41%
American Indian, Alaska Native	30	10	0	75%
Pacific Islander	30	35	0	46.15%
Hispanic	2,235	1,260	0	63.95%

Table 15 - Disproportionately Greater Need 50 - 80% AMI

Data Source:	2011-2015 CHAS
---------------------	----------------

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionately greater need
Jurisdiction as a whole	1,970	3,155	0	38.44%
White	550	1,245	0	30.64%
Black / African American	4	25	0	13.79%
Asian	770	1,150	0	40.10%
American Indian, Alaska Native	0	0	0	0
Pacific Islander	10	4	0	71.43%
Hispanic	605	695	0	46.54%

Table 16 - Disproportionately Greater Need 80 - 100% AMI

Data Source:	2011-2015 CHAS
---------------------	----------------

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. One hundred seventeen complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

A disproportionately greater need exists at the highest rate in the 0-30% of the AMI income category in the jurisdiction as a whole. 80.07% of extremely low-income households have a

disproportionately greater need. 77.30% of very low-income households (30% -50% of AMI) have a disproportionately greater need. Only 38.44% of households earning 80%-100% of AMI had a disproportionately greater need.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b) (2)

Assess the need for any racial or ethnic group that has a disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The disproportionately greater need is determined when members of a particular ethnic community or race experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

Although the purpose of these tables are to analyze the relative level of need for each race and ethnic category, the data also provides information for the jurisdiction as a whole that can be useful in describing overall needs. Disproportionate housing needs in a population are defined as having one or more of the following four housing problems in greater proportion than the jurisdiction as a whole: 1) living in housing that lacks complete kitchen facilities, 2) living in housing that lacks complete plumbing facilities, 3) more than 1.5 person per room (severe overcrowded), and 4) cost burden greater than 50% of the Area Median Income (AMI).

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionately greater need
Jurisdiction as a whole	7,470	2,475	640	70.57%
White	1,140	695	200	56.02%
Black / African American	95	25	0	79.17%
Asian	3,180	1,390	290	65.43%
American Indian, Alaska Native	70	4	0	94.59%
Pacific Islander	35	0	0	100%
Hispanic	2,900	325	125	86.57%

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source:	2011-2015 CHAS
---------------------	----------------

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionately greater need
Jurisdiction as a whole	4,030	3,850	0	51.14%
White	670	1,110	0	37.64%
Black / African American	10	45	0	18.18%
Asian	1,655	1,335	0	55.35%
American Indian, Alaska Native	30	4	0	88.24%
Pacific Islander	25	25	0	50%
Hispanic	1,590	1,275	0	55.50%

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source:	2011-2015 CHAS
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*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionately greater need
Jurisdiction as a whole	2,925	7,590	0	27.82%
White	470	2,585	0	15.38%
Black / African American	15	85	0	15%
Asian	1,105	2,535	0	29.95%
American Indian, Alaska Native	0	35	0	0
Pacific Islander	25	40	0	38.46%
Hispanic	1,280	2,220	0	36.57%

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source:	2011-2015 CHAS
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*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionately greater need
Jurisdiction as a whole	875	4,250	0	17.07%
White	85	1,710	0	4.74%
Black / African American	0	30	0	0
Asian	365	1,560	0	18.96%
American Indian, Alaska Native	0	0	0	0
Pacific Islander	10	4	0	71.43%
Hispanic	400	895	0	30.89%

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source:	2011-2015 CHAS
---------------------	----------------

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

A disproportionately greater need exists at the highest rate in the extremely low-income population in Garden Grove (0-30% of the AMI), which is 70.57%. 51.14% of very low-income

households (30% -50% of AMI) have a disproportionately greater need. Only 17.07% of households earning 80%-100% of the AMI had a disproportionately greater need.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b) (2)

Assess the need for any racial or ethnic group that has a disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

The housing cost burden refers to the percentage of income that households spend on housing. HUD has determined that housing should cost less than 30% of a household’s total income to be considered affordable. The disproportionately greater need is determined when members of a particular ethnic community experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	%	30-50%	%	>50%	%	No / negative income (not computed)
Jurisdiction as a whole	25,330	53.89	10,060	21.40	10,930	23.26	680
White	9,415	65.79	2,585	18.06	2,110	14.74	200
Black / African American	325	61.32	100	18.87	105	19.81	0
Asian	8,825	51.41	3,880	21.84	4,755	26.77	305
American Indian, Alaska Native	19	10.05	70	37.04	100	52.91	0
Pacific Islander	105	46.67	45	20	75	33.33	0
Hispanic	6,360	47.25	3,285	24.41	3,660	27.19	155

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source:	2011-2015 CHAS
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Discussion:

In this section, the first column sets a baseline for comparing households that are considered affordable at a cost burden of less than 30%. A disproportionately greater need exists among households that have a cost burden of 50% or higher, which is 23.28% for the entire jurisdiction. American Indian/Alaska Native households have a disproportionately greater housing cost burden between 30-50% at 37.04%, and 52.91% of households have a housing cost burden that is greater than 50% in the jurisdiction. Pacific Islander households also experience a disproportionately greater housing cost burden that is greater than 50% at 33.33% in the jurisdiction.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b) (2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

For NA-15: Housing problems

- 0-30% AMI - Pacific Islander households have a disproportionately greater need at 100 %, followed by American Indian/Alaska Native at 94.59% and Hispanic households at 90.58%.
- 30%-50% AMI- Pacific Islander households have a disproportionately greater need at 100 %, followed by American Indian/Alaska Native households at 88.24%, Hispanic households at 87.97%, and Asian households at 81.44%.
- 50-80% AMI- American Indian/Alaska Native households have a disproportionately greater need at 75%, followed by African American households at 74.75%.
- 80-100% AMI- Pacific Islander households have a disproportionately greater need at 71.43%.

For NA-20: Severe housing problems

- 0-30% AMI - Pacific Islander households have a disproportionately greater need at 100 %, followed by American Indian/Alaska Native at 94.59%, and Hispanic households at 86.57%.
- 30%-50% AMI- American Indian/Alaska Native households have a disproportionately greater need at 88.24%.
- 50-80% AMI- Pacific Islander households have a disproportionately greater need at 38.46%.
- 80-100% AMI- Pacific Islander households have a disproportionately greater need at 71.43%, followed by Hispanic households at 30.89%.

For NA-25: Housing Cost Burdens

- 30%-50% Cost burden - American Indian/Alaska Native households have disproportionately greater housing cost burden at 37.04%.

- Cost Burden greater than 50%- American Indian/Alaska Native households have disproportionately greater housing cost burden at 52.91%, followed by Pacific Islander households at 33.33%.

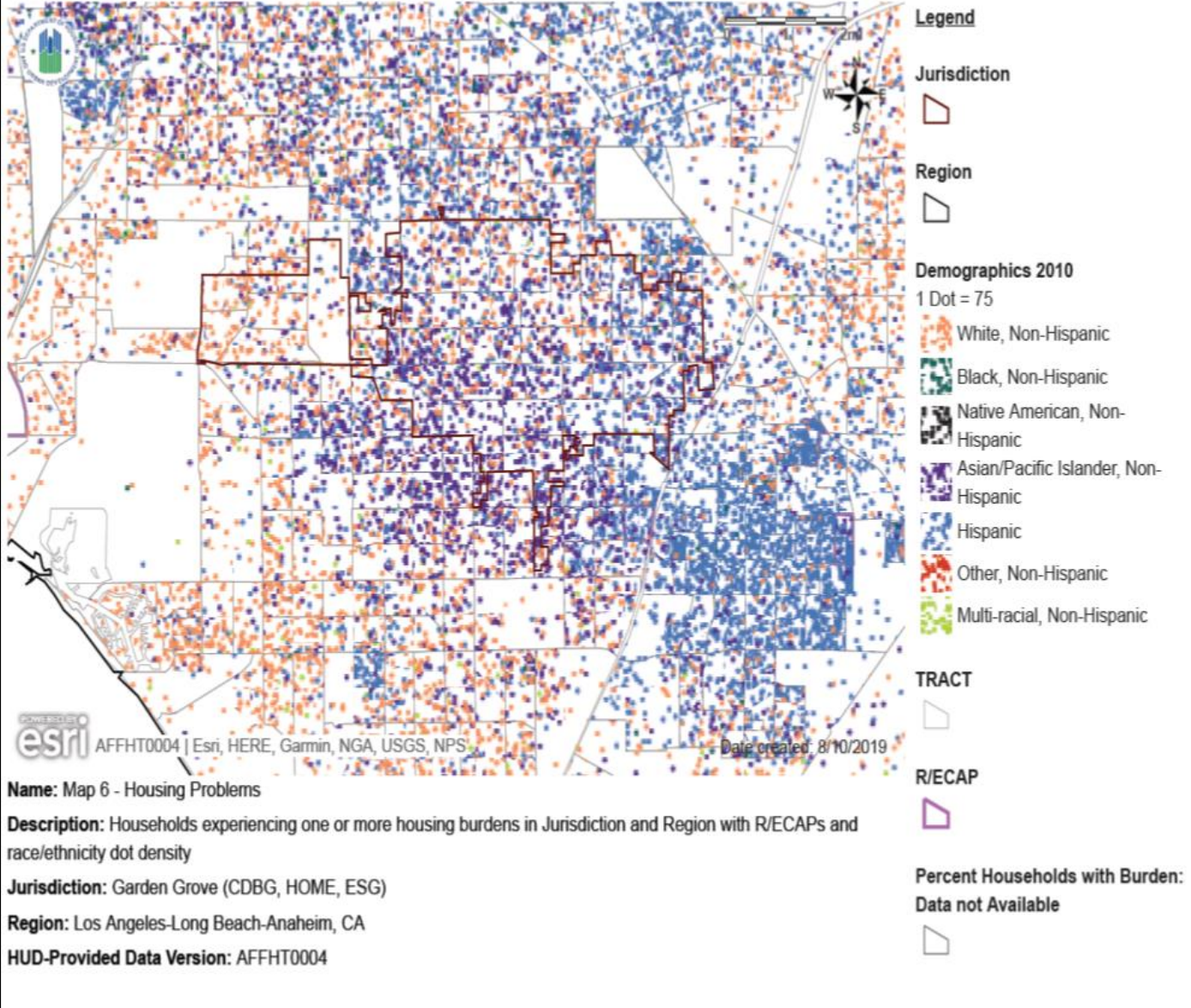
If they have needs not identified above, what are those needs?

No other needs have been identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The image below shows the location of racial/ethnic groups within the jurisdiction. Asian/Pacific Islander households, Hispanic households, and White households form a majority of the population in Garden Grove. Based on this map, racial or ethnic groups are seemingly evenly distributed in the city except for the West to North West of the city, where white households are the majority and the East where there are a higher percentage of Hispanic households. Asian/Pacific islander households are populated in the central and southern parts of the city. However, data on the percentage of households with burdens/housing problems are unavailable.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



NA-35 Public Housing – 91.205(b)

Introduction

The City of Garden Grove Housing Authority is a Section 8 Housing Authority. The City works with the County of Orange and local jurisdictions to provide lower-income affordable housing for its residents. In total, the City provides approximately 1,171 affordable units to lower-income households. Due to the 13,800 applicants on the Housing Authority’s Section 8 Choice Voucher Program waiting list, there is a need to develop additional units of affordable housing.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source:	PIC (PIH Information Center)
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Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	16,446	14,423	16,487	0	0
Average length of stay	0	0	0	8	0	8	0	0
Average Household size	0	0	0	2	1	2	0	0
# Homeless at admission	0	0	0	6	2	4	0	0
# of Elderly Program Participants (>62)	0	0	0	1,273	29	1,244	0	0
# of Disabled Families	0	0	0	322	7	313	0	0
# of Families requesting accessibility	0	0	0	2,569	51	2,516	0	0

features								
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source:	PIC (PIH Information Center)
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Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	451	11	440	0	0	0
Black/African American	0	0	0	66	3	63	0	0	0
Asian	0	0	0	2,037	34	2,001	0	0	2
American Indian/Alaskan	0	0	0	4	1	3	0	0	0

a Native									
Pacific Islander	0	0	0	11	2	9	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Race of Public Housing Residents by Program Type

Data Source:	PIC (PIH Information Center)
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Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	286	11	275	0	0	0
Not Hispanic	0	0	0	2,283	40	2,241	0	0	2

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source:	PIC (PIH Information Center)
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Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Based on table 24 above, there are 2,569 families requesting housing with accessibility features. 1,273 elderly program participants (older than 62 years of age) and 322 disabled families are also in need of this type of affordable housing. Currently, 2,677 applicants on the Housing Authority's Section 8 Choice Voucher Program waitlist are disabled, which represents approximately 19%.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

With voucher holders having an average annual income of \$16,446 (26.3% of AMI), applicants require affordable housing. 4,164 households require affordable housing with accessibility features.

How do these needs compare to the housing needs of the population at large

These needs are not different from the housing needs of the general population. This is evident where the disproportionately greater need exists among extremely low, very low, and low-income households which may not be receiving any housing assistance. These households may include the 14,425 that have one or more housing problems and an income ranging from 0-80% of the AMI.

Discussion

Refer to the discussion above.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

According to the “2019-2020 Budget: Considerations for Governor’s Proposals to Address Homelessness”, California has more people experiencing homelessness than any other state in the nation and is facing a severe affordable housing crisis. California has 25% of the total homeless population in the nation, which represented around 130,000 homeless individuals as of January 2018. The Orange County Continuum of Care (CoC) is a regional partnership that aims to address the needs of individuals and families experiencing homelessness and preventing homelessness by;

- Promoting community-wide commitment to the goal of ending homelessness through Regional Coordination and collaboration;
- Advocating for funding and resources to end homelessness and provide funding for proven efforts by nonprofit providers, States, and local government agencies to quickly rehouse people experiencing homelessness while minimizing the trauma and dislocation caused to homeless individuals, families, and communities;
- Promoting access to and effective utilization of mainstream programs by homeless individuals and families;
- Promoting implementation of best practices and evidence-based approaches to homeless programming and services.

The City of Garden Grove is part of the Orange County CoC, which comprises 34 cities and Unincorporated Areas and requires participation from County departments and agencies, local governments, housing providers, homeless and supportive service providers, and community groups (including non-profits, faith-based organizations, business leaders, schools, and individuals with lived experiences).

According to the Orange County 2019 Point-in-Time (PIT) Count, 6,860 persons were registered as homeless in Orange County. Out of this number, 3,961 were experiencing unsheltered homelessness (57.74%), and 2,899 (42.26%) of individuals were sheltered. The County is divided into three service planning areas (SPA): North, Central, and South. The City of Garden Grove is located in the Central SPA, where there are 3,332 homeless individuals.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Due to the high mobility of homeless persons and families, it is quite difficult to keep track of the rate of homelessness over 12 months. The PIT Count helps assess homelessness in the jurisdiction and provides data that can be used to address the needs of the homeless. There are two main categories of homeless persons in the Orange County 2019 PIT count under which families are counted.

- Unsheltered Homeless - People with a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, regular sleeping accommodation for human beings.
- Sheltered Homeless - People who are living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals).
- Chronically homeless - Persons who have either been continuously homeless for at least 12 months or have experienced at least four episodes of homelessness in the last three years where the combined occasions total at least 12 months.

Occasions are separated by a break of at least seven nights. Stays in institutions of fewer than 90 days do not constitute a break and are also considered in this count. 2,491 adults were experiencing chronic homelessness. Of this number, 52% (1,932) were unsheltered, and 25.81% (559) were sheltered.

There are also three subpopulations considered in the 2019 PIT count:

- **Veterans** - There were 311 veterans counted in Orange County. Nearly 31.83% were sheltered, and 68.17% were unsheltered. 46.30% of the veterans were identified as

chronically homeless. 54.66% of sheltered and unsheltered veterans were age 55 and older.

- **Seniors (62 years and above)** - There were 612 seniors counted. 48.86% of them were chronically homeless. 14.05% of the seniors are veterans, and 43.2% of unsheltered seniors were retired and disabled.
- **Transitional youth (18-24 years)** - 275 transitional age youth were counted as experiencing homelessness countywide. Of these, 117 were sheltered and 158 were counted as unsheltered. A total of 12% were identified as chronically homeless.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:		Unsheltered (optional)	
American Indian or Alaska Native	3.86%	112 Individuals	1.87%	74 Individuals
Asian	3.28%	95 Individuals	3.11%	123 Individuals
Black or African American	15.01%	435 Individuals	8.41%	333 Individuals
Native Hawaiian or other Pacific Islander	1.21%	35 Individuals	1.67%	66 Individuals
White	72.54%	2,103 Individuals	72.71%	2,880 Individuals
Multiple Races or Other	4.10%	119 Individuals	12.24%	485 Individuals
Ethnicity:	Sheltered:		Unsheltered (optional)	
Hispanic or Latino	38.84%	1,126 Individuals	34.18%	1,354 Individuals
Non-Hispanic or Non-Latino	65.82%	2,607 Individuals	14.69%	426 Individuals

Derived from the 2019 PIT count- Orange County page 22

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

During the 2019 PIT Count, there were 466 families totaling over 1,550 persons that were counted as homeless in Orange County. Out of this number, 584 persons were adults and 966 persons were children. In the City of Garden Grove alone, there were 225 homeless persons. Out of this number, there were 63 families and 7 veterans. In the City of Garden Grove, the homeless family composition were as follows:

FAMILY COMPOSITION	SHELTERED		UNSHELTERED	
TWO PARENT FAMILY	18.79%	28 Families	40.00%	12 Families

ONE PARENT FAMILY	81.21%	121 Families	60.00%	18 Families
Single Father	4.03%	6 Families	10.00%	3 Families
Single Mother	77.18%	115 Families	50.00%	15 Families

2019 PIT Count Orange County page 44

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In the Central SPA, the extent of homelessness by racial and ethnic group is shown as follows:

Race:	Sheltered:	Unsheltered:
American Indian or Alaska Native	4.05% 61 Individuals	2.19% 40 Individuals
Asian	4.78% 72 Individuals	4.60% 84 Individuals
Black or African American	14.09% 212 Individuals	8.21% 150 Individuals
Native Hawaiian or other Pacific Islander	1.13% 17 Individuals	1.26% 23 Individuals
White	72.29% 1,088 Individuals	71.87% 1,313 Individuals
Multiple Races or Other	3.65% 55 Individuals	11.88% 217 Individuals
Ethnicity:	Sheltered:	Unsheltered:
Hispanic or Latino	40.66% 612 Individuals	33.22% 607 Individuals
Non-Hispanic or Non-Latino	59.34% 893 Individuals	66.78% 1,220 Individuals

PIT 2019 Orange County –Central SPA Page 43

Non-Hispanic ethnicities have the highest prevalence of homelessness in Orange County and in the City of Garden Grove. Specifically, white individuals had the highest number of homeless persons in the Central SPA.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

In Orange County, there were a total of 3,961 unsheltered and 2,899 sheltered families and individuals. In the Central SPA, there were 1,827 unsheltered and 1,505 sheltered individuals and families. This is further broken down in the table below.

Population	Description	Unsheltered (1,827)	Sheltered (1,505)	TOTAL (3,332)
Individuals	Individuals ages 18+	1,706	1,023	2,729
Families	Households with at Least 1 adult and 1 child	30 FAMILIES 121 persons in Households: 44 Adults 77 Children	149 FAMILIES 477 persons in Households: 182 Adults 295 Children	179 FAMILIES 598 persons in Households: 226 Adults 372 Children
Unaccompanied Youth	Minors (17 and Younger without Parent/guardian)	0	5	5

Orange county PIT Count, 2019: Central Service Planning Area page 40

A total of 52.02% of homeless adults in Orange County were chronically homeless and unsheltered, while those who were sheltered represent 25.81% of the population. In comparison, the number of chronically homeless people in the central SPA was 52.91% unsheltered, and 25.56% sheltered adults. The City of Garden Grove has 225 (163 unsheltered and 62 sheltered) persons recorded as experiencing homelessness. Of these, 162 were individuals (149 unsheltered and 13 sheltered), 63 were families (14 unsheltered and 49 sheltered), 7 were unsheltered veterans, 8 were transitional aged youth (4 unsheltered and 4 sheltered), and 15 were unsheltered seniors.

Discussion:

The Garden Grove Coalition to end homelessness offers rental assistance through the Homeless Emergency Assistance Rental Transition (HEART) Program. The program pays a portion of a household’s rent (including security and utility deposits) while offering services to achieve self-sufficiency for homeless individuals and families. The program is administered by two non-profit service providers, Interval House and Mercy House and aims to assist 20 households over a 12-month period.

Orange County also launched the Marching Home: A Strategy to End Veterans Homelessness in Orange County. The purpose is to house the 311 veterans who identified as experiencing homelessness during the 2019 PIT Count. There was, however, an increase in the number of homeless persons/families in Orange County by 43% compared to the 2017 PIT count.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b, d)

Introduction:

Special needs groups have unique challenges to access affordable housing. These challenges include but are not limited to: being a senior (over the age of 62), overcrowding due to large family sizes, female-headed households, persons with physical disabilities, persons with developmental disabilities, persons who have severe mental illness, persons with drug/alcohol addiction, victims of domestic violence, and persons with AIDS and related diseases.

Describe the characteristics of special needs populations in your community:

Seniors: Seniors are defined as persons above the age of 62. Typically, elderly persons have limited and fixed incomes, increasing physical limitations and disabilities, and high medical expenses. Also, many are transit-dependent and live alone. Based on the ACS 2013-2017 5-year estimates, 16.1% of the population in Garden Grove is above the age of 62. There were an estimated 9,490 owner-occupied units and 5,293 renter-occupied units of persons from the age of 60 to 85 years and over.

Large Families: Household size is broken into large (5+) and small (4 or less). These households are usually families with two or more children or families with extended family members. Based on the 2010 Census, there were approximately 13,000 large households with four or more members in Garden Grove. At least 56% were homeowners. This number increased to about 20,175 in the 2013-2017 ACS estimates, 43% being renters and 42% being homeowners. The greatest problem experienced by this population is a high housing cost burden, which leads to overcrowding in many cases. According to CHAS data, 86% of large families renting experienced housing problems, compared to 67% of all households who are renting in Garden Grove.

Female Heads of Households: According to the 2010 census data, 16% of all households in Garden Grove were female-headed, representing approximately 7,400 households. At least 7% of these households had children. This number reduced slightly to 7,383 households covering 15.5% of households in the 2013-2017 ACS estimates. Of these, 13% are owners, while 18.5% are renter households.

Persons with a Disability: HUD defines a disability as a physical or mental impairment that substantially limits one or more of the major life activities for an individual. In the 2010 census, 10% of the United States' population reported a disability. A total of 40% identified as senior citizens. Most were unable to work and may only have access to a fixed income.

Developmentally Disabled: A "developmental disability" is a disability that originates before an individual is 18 years of age, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual (i.e., mental retardation, cerebral palsy, epilepsy, and autism). Developmental disabilities do not include other handicapping conditions that are solely physical.

Severely Mentally ill: Severe mental illness includes a diagnosis of psychoses (e.g., schizophrenia) and major affective disorder (e.g., bipolar disorder, major depression).

What are the housing and supportive service needs of these populations and how are these needs determined?

The needs for all these populations are determined through this Consolidated Plan as follows:

Seniors – Due to their fixed incomes, increasing medical needs and mobility challenges, seniors require accessible housing in close proximity to healthcare facilities and ease of transit. Seniors also need rehabilitation services to maintain and improve the condition of their housing. Additionally, seniors often need rental assistance through housing vouchers due to their fixed incomes.

Disabled - Disabled individuals would require not only housing assistance in the form of rental and mortgage subsidies, but also group housing with accessibility features that would be ideal for people with mobility issues and sensory limitations. Their housing needs will also require ease of access to transit, shopping and healthcare facilities. They may also require specialized medical care and education, especially for the developmentally disabled. Additionally, disabled individuals who have been discharged from medical/healthcare facilities might also need transitional housing.

Large Families and Families with Female Heads of Households - Large families need low-cost housing that require a minimum of 3 bedrooms to accommodate all members in the home sufficiently. This housing would need to cost lower than the Fair market rent for 3 and 4 bedroom households at \$2,626 and \$3,045 respectively. Families with Female Heads of Households may not only require affordable housing assistance, but those with children also need accessibility to healthcare facilities and educational institutions. Childcare assistance for those who are not of school-going age may also be required. These same needs may also apply to large families

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the Orange County HIV Disease Surveillance and Monitoring Program, through the 2018 HIV Disease Fact Sheet by the Health Care Agency, Disease Control Division, the total estimated number of people living with HIV (PLWH) in Orange County is 7,262. There were 6,369 PLWH at the end of 2018 and an estimated 893 persons who are unaware of their HIV status. Of that total 87.7% have been diagnosed, 81.7% had linked to HIV care, 66.4% were retained in HIV care, while 62.8% PLWH are estimated to be receiving antiretroviral therapy (ART).

The rate of those who have HIV has decreased from 8.2% in 2009 to 4.4% in 2018. There were 280 persons newly diagnosed with HIV and 57 persons were concurrently diagnosed with AIDS in 2018. This indicates that the individual was living with HIV disease, but unaware of their status for a significant amount of time. Concurrently diagnosed persons are those who had an AIDS-defining condition (CD4 count below 200 cells/ μ L and a diagnosis of a disease that is an indicator condition for AIDS) within one month (31 days) of their HIV diagnosis.

The rate of infection among males was 17.0% from 2016 to 2018. The female population had a significantly lower infection rate at 1.6% in the same period. The average rate of infection per 100,000 population from 2016-2018 was highest among African American people at 29.8%, followed by Hispanic people at 12.9%, Caucasians at 7.4% and Asians were the least likely at

6.6%. The rate of infection was the highest among persons between 26-35 years of age at 26.9%.

The rate of infection in Garden Grove per 100,000 population was between 9.6-13.7%. In the 2019 PIT count, 2.07% (25) sheltered Individuals and 2.47% (42) unsheltered individuals had HIV in the Central SPA. Individuals with HIV require consistent medical care in addition to transitional and affordable housing.

Discussion:

Refer to the discussion above.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Public facilities offer social and recreational services that are useful to the entire population, such as parks, youth centers, and firehouses and community centers. These facilities may also offer additional support for special needs groups, such as childcare facilities for single-parent households, homeless, and healthcare facilities as well. In the City of Garden Grove, the following facilities are considered:

- Park & Recreation Facilities
- Health Care Facilities
- Youth Centers
- Libraries
- Fire Stations & Equipment
- Community Centers
- Child Care Centers
- Senior Centers

How were these needs determined?

The City of Garden Grove conducted a Community Needs Survey for this Consolidated Plan. The need for Parks and recreation facilities, as well as fire stations and equipment, were identified as high priority areas as indicated below:

- Park & Recreation Facilities - 51.81%
- Fire Stations & Equipment - 41.49%

Describe the jurisdiction's need for Public Improvements:

Public improvements ensure that infrastructure such as pavements and street lighting, which improve neighborhoods by upgrading public works. They also include neighborhood services such as graffiti removal, parking facilities, and tree planting. In the City of Garden Grove, the following facilities are considered:

- Drainage Improvements
- Sidewalk/Alley Improvements
- Street Lighting
- Water/Sewer Treatment
- Graffiti Removal
- Trash & Debris Removal
- Cleanup of Abandoned Lots and Buildings
- Parking Facilities
- Tree Planting

How were these needs determined?

The City of Garden Grove conducted a Community Needs Survey for this Consolidated Plan. The need for public works and neighborhood facilities were identified as high priority areas, as indicated below:

Public Works:

- Street/Alley Improvements - 62.94%
- Sidewalk Improvements - 54.17%

Neighborhood Services:

- Cleanup of Abandoned Lots and Buildings - 71.79%
- Graffiti Removal - 62.76%

Describe the jurisdiction's need for Public Services:

Special Needs Services include programs, initiatives, and services offered in public facilities, including homeless services and HIV /AIDS services and centers, which also serve special needs groups. They also include community services such as legal services and transportation services, which are aimed at improving the quality of life for the residents. In the City of Garden Grove, the following services are considered:

- Neglected/Abused Children Center/Services
- Homeless Shelters and/or Services
- Substance-Abuse Services and Counseling
- Domestic Violence Services and Counseling
- Centers/Services for Disabled Persons
- Accessibility Improvements (ADA)
- HIV/AIDS Centers & Services
- Anti-Crime Programs
- Youth Activities
- Health Services
- Transportation Services
- Mental Health Services
- Senior Activities
- Child Care Services
- Legal Services

How were these needs determined?

The City of Garden Grove conducted a Community Needs Survey for this Consolidated Plan. The need for community and public services were identified as high priority areas, as indicated below:

Community Services

- Anti-Crime Programs - 70.62%
- Mental Health Services - 53.61%

Special Needs Services

- Homeless Shelters and/or Services - 53.40%
- Substance-Abuse Services and Counseling - 44.21%
- Neglected/Abused Children Center/Services - 44.21%

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The city of Garden Grove has had a modest population growth rate of 1.2% from 2010 to 2017 based on the ACS data estimates. The cost of housing, however, is rising much faster each year. This growing population requires a growing housing market that caters to all income categories. This section is broken down as follows:

MA 10 - Number of Housing Units

Examines the current number of different types of housing and projects future housing needs that cater to the population within the city.

MA 15 - Housing Costs

Analyzes the cost of housing, taking into consideration projected home values and comparing HOME and fair housing rents.

MA 20 - Condition of Housing

The age of housing is analyzed to determine the quality of the housing stock.

MA 25 - Public and Assisted Housing

The availability of affordable housing units and growth potential for low-income households is examined in this section.

MA 30 - Homeless Facilities and Services

This section is a follow up from the Needs Assessment (NA), which outlined the programs and initiatives that support homeless persons within the jurisdiction.

MA 35 - Special Needs Facilities and Services

This section expands on the Needs Assessment that explored the facilities and services available to special needs groups, such as seniors and the disabled.

MA 40 - Barriers to Affordable Housing

This area looks at how government regulations can prevent the growth of the housing market by preventing timely construction and rehabilitation of housing stock.

MA 45 - Non-Housing Community Development Assets

This section analyzes how the labor force has acted as an asset towards economic development efforts within the city. The relationship between academic attainment, income level, and the ability to afford housing is analyzed.

MA 50 - Needs and Market Analysis Discussion

This section attempts to visualize the location of households that experience housing problems or low-income areas within the jurisdiction

The Market Analysis also gives insights into the housing needs in the City of Garden Grove and how regional and state agencies, through their programs, actualize local goals to improve housing in the jurisdiction.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Based on the 2017 ACS, the total number of housing units was an estimated 48,758. 1-unit detached structures are the most prevalent type of housing in the housing market at 56.3%. This is followed by 5-19 units of housing at 12.8% and 20 or more units of housing at 10.2% respectively. Mobile homes, boats and RVs were the least prevalent at 3.6%. Owner-occupied housing units constitute 53.8% of occupied households in the city, while renter-occupied households make up 46.2% of the city.

There has been a small growth of housing units in Garden Grove from 2010 (47,454) at an annual rate of approximately 1.4%, with the exception of a small decline of 0.1% from 2016 to 2017.

All residential properties by number of units

Property Type	Number	Percentage
1-unit detached structure	27,473	56.3%
1-unit, attached structure	4,187	8.6%
2-4 units	4,142	8.5%
5-19 units	6,220	12.8%
20 or more units	4,981	10.2%
Mobile Home, boat, RV, van, etc.	1,755	3.6%
Total	48,758	100%

Table 31 – Residential Properties by Unit Number

Data Source:	2013-2017 ACS
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Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	288	1.1%	726	3.3%

1 bedroom	751	2.9%	5,799	26.4%
2 or 3 bedrooms	15,235	59.5%	12,951	59%
4 or more bedrooms	9,324	36.4%	2,462	11.2%
Total	25,598	100%	21,938	100%

Table 32 – Unit Size by Tenure

Data Source:	2013-2017 ACS
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Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The City of Garden Grove is a recipient of the Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) to fund housing initiatives. Housing grants and funding is targeted to fund programs that serve extremely low to moderate income households earning 0-80% of the Area Median Income (AMI). There are about 18 housing projects with 1,232 affordable housing units in the table below.

Project Name	Affordable Units	Total Units
Acacia Villa Apartments	159	161
Arbor Glen Apartments	68	136
Arroyo Vista	10	148
Aslam	10	10
Crystal View Apartments	80	400
Briar Crest and Rose Crest	Briar –32 Rose –10	Briar –32 Rose –10
Garden Grove Manor	31	78
Garden Grove Senior Apartments	85	85
Jordan Manor	64	65
OC Community Housing Corp	44	44
Malabar	126	126
Stuart Drive Apartments	144	144

Rose Garden Apartment	95	95
Sungrove Senior Apartments	80	82
Thomas House	14	14
Tudor Grove	144	144
Valley View Senior Villas	36	178
Total	1,232	1,952

Orange County affordable housing list updated on December 10th, 2019.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to the City of Garden Grove’s 2014-2021 Housing Element, between 2014 and 2024, a total of 21 assisted developments that provide 528 affordable units have expiring affordability covenants. These include developments that hold Federal Section 8 contracts and/or were financed with redevelopment set aside funds or federal programs (CDBG, HOME).

Development Name	Total Units	Affordable Units	Term of Affordability in years	Termination of Covenant
Arroyo Vista Development Partners LLC (12242-12352 Haster Street)	148	10	15	2014
Crystal View Apartments (12091 Bayport) 12091 Bayport	402	80	15	2013
Framingham Investment (14072 Buena Street)	4	4	15	2015
Framingham Investment (14112 Buena Street)	4	4	15	2015
Framingham Investment (12681 Morningside)	8	8	24	2020
Grove Park (12622-12682 Keel and 1272-12692 Morningside)	104	104	15	2024
Jamboree - Rose Crest (11762 Stuart Drive)	10	10	15	2013
Jordan Manor Senior Housing (11441 Acacia)	65	65	36	2021
Pat Stein (Palma Vista 10772, 10781 and 10862 Palma Vista)	24	24	15	2012
12131 Tamerlane Drive	4	4	15	2021
12182 Tamerlane Drive	6	4	15	2020
12171 Tamerlane Drive	4	4	15	2021
12141 Tamerlane Drive	4	4	15	2020
12161 Tamerlane Drive	4	4	15	2021

12212 Tamerlane Drive	8	3	15	2019
12222 Tamerlane Drive	9	4	15	2019
12181 Tamerlane Drive	6	4	15	2019
12201 Tamerlane Drive	6	4	15	2019
12202 Tamerlane Drive	6	4	15	2019
Tudor Grove (12631 Sunswept Avenue)	144	144	30	2022
Valley View Senior Apartments (12220 Valley View)	178	36	30	2020
TOTAL	1,148	528		

Affordable Units At-Risk of Converting to Market Rate: City of Garden Grove Housing Element (2014-2024)

Does the availability of housing units meet the needs of the population?

The number of housing units in Garden Grove has seen a modest growth of 1.4% from 2010 to 2017 based on ACS data estimates. The number of vacant units also reduced from 3.7% in 2010 to 2.5% in 2017 and the vacancy rate also reduced from 4.4% to 1.6%, which is an indicator that population growth is outpacing the availability of housing.

Describe the need for specific types of housing:

The Regional Housing Needs Allocation (RHNA) is a mandated state quota for increasing housing stock within different jurisdictions. This allocation mandates that jurisdictions have to increase their housing stock to meet the demand for housing in different income categories. For the City of Garden Grove, the Southern California Association of Governments (SCAG) determines this allocation. About 27.9% of households in Garden Grove are low-income households. Based on the RHNA allocations for the City of Garden Grove as shown in the table below, there is a 38% allocation for extremely low and low-income populations. This allocation is also pursuant to AB 2634, where local jurisdictions are required to project the housing needs of extremely low-income households (0-30% AMI).

Income Group	% of County AMI	2013 Total Housing Units	Allocated Percentage of Units
Extremely/Very Low	0-50%	164	22%
Low	51-80%	120	16%
Moderate	81-120%	135	18%
Above moderate	120%+	328	44%

Total	747	100%
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Southern California Association of Governments-RHNA 2014-2021

Also, based on the needs assessment there is a need for low-income housing units in the housing stock to reduce the rate of overpayment and overcrowding.

Discussion

Refer to discussion above

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The cost of housing is an indicator of the availability and affordability of housing in a jurisdiction. The high cost of housing may lead to overpayment, overcrowding and in some cases homelessness, especially for low-income households (0-50% of AMI)

According to the ACS 2013-2017 data estimates, there has been an increase in median rents by 5% and a slight increase of median home values by 0.4%, as illustrated in Table 33 below. The Area Median Income (AMI) has only increased by 1.3% from 2010-2017 which shows that the cost of housing is increasing at a higher rate than incomes.

Cost of Housing

	Base Year: 2010	Most Recent Year: 2017	% Change
Median Home Value	472,900	476,300	0.4%
Median Contract Rent	1,284	1,421	5%

Table 33 – Cost of Housing

Data Source:	2006-2010 ACS (Base Year), 2013-2017 ACS (Most Recent Year)
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Rent Paid	Number	%
Less than \$500	1,516	7.1%
\$500-999	2,216	10.4%
\$1,000-1,499	8,304	39.1%
\$1,500-1,999	5,348	25.2%
\$2,000 or more	3,872	18.2%
Total	21,256	100.0%

Data Source:	2013-2017 ACS
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Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,860	No Data
50% HAMFI	3,864	985
80% HAMFI	15,269	2,825
100% HAMFI	No Data	5,920
Total	20,993	9,730

Table 35 – Housing Affordability

Data Source:	2011-2015 CHAS
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Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,294	1,493	1,876	2,626	3,045
High HOME Rent	1,224	1,313	1,577	1,814	2,004
Low HOME Rent	957	1,025	1,230	1,421	1,585

Table 36 – Monthly Rent

Data Source:	HUD FMR and HOME Rents
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Is there sufficient housing for households at all income levels?

Based on the data in Table 35 above, households with extremely low- and very low-incomes in Garden Grove have a shortage of affordable housing. There are 1,860 affordable rental units available to extremely low-income households (0-30% of HAMFI) and 3,864 renter and 985 owner units available to very low-income households (31-50% of HAMFI). According to the 2013-2017 ACS estimates, about 8,937 households have incomes between 0-30% of AMI in

Garden Grove and about 8,889 households with incomes between 30%-50% of AMI. The City has 18,094 housing units affordable to households earning incomes between 50%-80% of AMI.

How is affordability of housing likely to change considering changes to home values and rents?

As indicated in the introduction above, the AMI has only increased by 1.3% while median rents have gone up by 5% with a slight increase of median home values increasing by 0.4% between 2010 and 2017. According to Table 34, 39.1% of renters were paying between \$1,000-\$1,499, which is the median value based on the 2013-2017 ACS data. The Santa Ana-Anaheim-Irvine, CA HUD Metro FMR Area HOME/ Housing Trust Fund (HTF) Homeowner value limits for 2018 show a \$60,000 increase in the unadjusted median value from \$540,000 for existing units to \$600,000 for new units. This figure saw an increase in 2019, which increased to \$560,000 for existing units (\$20,000 increase from 2018) and \$630,339 (\$30,339 increase from 2018) for new units, which is an increase of \$70,339 from existing to new units. This indicates that the cost of housing continues to rise in Garden Grove. In addition to the increase in affordable housing units through the RHNA allocation, the City continues to invest in rental assistance through the Section 8 Program, as well as maintaining the current housing stock through the City's rehabilitation programs and partnerships with nonprofits and developers.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The Fair Market Rent is determined by the housing demand and supply in an area while HOME Rent Limits are what beneficiaries of the affordable housing programs pay. HOME rents in the city are lower than the fair market rents. However, those paying high HOME rents for two or more bedroom units are paying higher than the median contract rent. The same applies to those paying low HOME rents for 4 or more bedroom units. This may greatly affect large families who identify, as a special needs group. There may be a need to provide subsidies for development permits and fees to maintain the low cost of new units and to maintain lower rents.

Discussion

In the last quarter of 2019, the Tenant Protection Act (AB 1482) was enacted to protect low-income renter households from arbitrary rental increases. However, the law came into effect on January 1, 2020 since it did not receive a two-thirds majority vote by the California State Assembly. During the implementation period there has been a need to issue temporary eviction moratoriums across the state of California by various jurisdictions to stop the eviction of tenants.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Housing units need to be maintained to ensure reinvestment, safety, and quality of housing. There are 4 conditions examined under the ACS data to determine the need for rehabilitation: lack of complete plumbing facilities, lack of complete kitchen facilities, 1.01 or more occupants per room in the household, and selected monthly owner or gross rent costs as a percentage of household income greater than 30%. The age of the housing stock informs the City of Garden Grove of the rehabilitation needs for its housing stock.

Definitions

According to the California Housing Law and Regulations (SB-488 on Substandard Housing), a housing unit is considered substandard when its condition “endangers the life, limb, health, property, safety, or welfare of the public or the occupants.” These conditions include inadequate or lack of sanitation facilities, such as: poor water supply, lack of lavatory and/or shower, poor or deteriorating flooring, damaged foundations and walls, and poor condition of electrical wiring and plumbing.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	9,076	35.5%	12,078	55.1%
With two selected Conditions	678	2.6%	2,849	13%
With three selected Conditions	18	0.1%	92	0.4%
With four selected Conditions	0	0%	0	0%
No selected Conditions	15,826	61.8%	6,919	31.5%
Total	25,598	100%	21,938	100%

Table 37 - Condition of Units

Data Source:	2013-2017ACS
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Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,419	5.5%	1,365	6.2%
1980-1999	2,986	11.7%	4,039	18.4%
1960-1979	8,222	32.1%	9,853	44.9%
Before 1960	12,971	50.7%	6,681	30.5%
Total	25,598	100%	21,938	101%

Table 38 – Year Unit Built

Data Source:	2013-2017 CHAS
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Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	21,193	83%	16,534	75%
Housing Units built before 1980 with children present	1940	8	800	4

Table 39 – Risk of Lead-Based Paint

Data Source:	2013-2017 ACS (Total Units) 2011-2015 CHAS (Units with Children present)
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Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Need for Owner and Rental Rehabilitation

Any housing structure that is more than 30 years old requires maintenance to remain fit for habitation. According to the 2013-2017 ACS data estimates, there are 82.8% of owner units and 75.4% of renter units that are at least 39 years old. This study also shows that 79% of all the

housing units are more than 30 years old. 48% of the housing stock has no selected housing conditions. Out of the 52% of units that have one to three housing conditions, 21,154 units require rehabilitation for one housing condition. Renter households have a higher need for rehabilitation with 68.5% of them having one to three housing conditions. 38.2% of the owner units have one to three housing conditions.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Housing that has been built before 1978 are at high risk of having lead-based paint (LBP) hazards. Based on Table 39 above, 83% of owner households (21,193) and 75% of renter units (16,534) were built before 1980 and are therefore at risk of having LBP hazards based on the 2013-2017 ACS data.

Discussion

Refer to the discussion above.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The City of Garden Grove Housing Authority receives federal funds to facilitate the housing needs of persons from low-income households. The City does not operate or own public housing units, however, it disseminates rental assistance through the Section 8 vouchers. The City is currently serving 2,200 households through the rental assistance program.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				2,200			0	0	0
# of accessible units									

***Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 41 – Total Number of Units by Program Type

Data Source:	PIC (PIH Information Center)
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Describe the supply of public housing developments:

There are no public housing units.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are no public housing units.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 42 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

There are no public housing units.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

There are no public housing units.

Discussion:

Refer to discussion above

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The Orange County Continuum of Care (CoC) has coordinated housing and social services funding for the homeless since 1988. The inter-agency and multi-organizational planning body also conducts the Point in Time (PIT) Homeless Biennial Count to monitor the rate of homelessness. The PIT Count determines the number of homeless persons in the jurisdiction by conducting a county-wide count of all sheltered and unsheltered homeless individuals on a given day. Those participating in the PIT Count were asked to complete surveys of each homeless person they encountered throughout the day and submit the results. The data that was collected is intended to capture information that can be used by jurisdictions to address issues surrounding homelessness.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Children)	590	n/a	816	516	n/a
Households with Only Adults	1798	400	319	1711	n/a
Chronically Homeless Households	n/a	n/a	n/a	n/a	n/a
Veterans	n/a	n/a	n/a	n/a	n/a
Unaccompanied Youth	n/a	n/a	n/a	n/a	n/a

Table 43 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

211 OC is one of the main resources offering assistance to persons experiencing homelessness in Orange County and Garden Grove. The platform offers links and contacts to health and human services. Services offered include the following:

Health Services and Facilities:

Children's Hospital of Orange County (Garden Grove) - This is a community health center provided by Children's Hospital of Orange County (CHOC) in collaboration with the Boys and Girls Club of Garden Grove, the Children and Families Commission of Orange County, and Healthy Smiles for Kids of Orange County. The 14,000 square-foot center provides pediatric medical-related services to children in Garden Grove. Services include childcare, immunizations, sick care, specialty care referral, education on childhood safety, and Healthy Families application assistance.

Magnolia Park Family Resource Center (Garden Grove) - This center provides health services that include health education classes and insurance enrollment assistance. The Center also provides Women, Infants, and Children (WIC) Program information, free immunization clinics, free home health visits for new moms, medical screenings, and doctor referrals.

Horizon Cross-Cultural Community Center (Garden Grove) - This center provides health and wellness programs and services community-wide. Their community health fair provides medical screening for disease and illnesses; immunizations and consultation with medical staff; application and eligibility assistance for programs including Medi-Cal, Healthy Families, Medical Services Initiative (MSI), and Access for Infants and Mothers (AIM); as well as providing educational materials on various diseases. The center also provides child seat safety classes and fish contamination education.

County of Orange Health Care Agency - This is a regional provider that promotes individual, family, and community health through coordination of public and private sector resources. Services sponsored by the Health Care Agency include: food protection, hazardous waste regulation, protection from animal-related diseases, water quality monitoring and pollution

prevention, mental health services, alcohol and drug abuse services, preventive health services for the aging, healthcare for incarcerated individuals, communicable disease control, child health, and a disability program. All Health Care Agency services are available to the Garden Grove community.

Nhan Hoa Comprehensive Health Care Clinic - This is a non-profit organization founded in 1992 by a group of Vietnamese professionals who responded to the needs of the underserved Vietnamese population. This facility provides cost-effective, family-based health services to people who may not otherwise have access to these services due to financial, language, cultural, lifestyle, or psychological barriers. Services offered include general medicine, health education, and application assistance for MSI and Healthy Families programs, pediatric care, women's healthcare, vision and dental care.

Casa de la Familia - is sponsored by the California Hispanic Commission on Alcohol and Drug Abuse. La Familia's services are designed to promote a better understanding of alcohol and drug abuse and related effects on families and communities. The programs are administered and funded through the State Victim Assistance Program, Board of Control. Programs offer psychological counseling and psychiatric treatment to victims and their families to help them cope with the trauma of being either a victim or a witness of a crime.

Mental Health Services:

The Orange County Health Care Agency, Behavioral Health Services coordinates resources, treatment programs, support services, and educational outreach for Orange County residents of all ages, backgrounds, and income status. Behavioral Health Services consists of three divisions: Adult Mental Health Services, Children and Youth Mental Health Services and Alcohol and Drug Abuse Services. Additionally, the Orange County Health Care Agency manages the Mental Health Services Act (MHSA) program, which consist of six components: Community Services and Supports (CSS), Workforce, Education and Training (WET), Prevention and Early Intervention (PEI), Capital Facilities and Technological Needs, MHSA Housing, and Innovative Programs.

Employment Services: Several programs and services are available to help homeless and non-homeless persons in the city of Garden Grove and the region gain employment. A few of these programs are listed below.

Orange County One-Stop Center - is funded by the Workforce Investment Act (WIA) and provides coordinated, customer-friendly, locally driven workforce development services and programs. Through the collaborative efforts of federal, state, county, local agencies, and businesses, the Orange County One-Stop Centers are designed to meet the needs of the employer and job seeker. One-Stop Centers are located in the cities of Westminster, Irvine, and Buena Park.

Self-Sufficient Family Program - This program is provided through the Garden Grove Housing Authority and is designed to encourage participants in the Section 8 Housing Choice Voucher Program to move towards career development and economic self-sufficiency. The program helps households find full-time and better paying jobs. Many participants achieve significant educational milestones, including bachelor's degrees, associate's degrees, and/or education certificates.

Project Independence - has offices in three locations throughout Orange County. Project Independence provides supportive services for adults with developmental disabilities, including: independent living, behavioral support, employment development, placement and training services, and recreational programs.

Youth Employment Opportunity Program (YEOP) - is provided by the California Employment Development Department for youths between the ages of 15 to 21 who are at risk of not achieving their educational goals. The program is designed to assist youth in achieving their educational and vocational goals with an emphasis on education, assessment, and peer advising.

Orange County Workforce Investment Board - WIA youth services emphasizes long-term educational and career development for youth ages 16 to 21 that are foster youth or emancipated foster youth, pregnant or parenting, ex-offenders, disabled, deficient in basic

skills, school dropouts, homeless, runaway, and have other barriers to employment. The WIA youth services help youth achieve placement in employment or education, attainment of a degree or certificate, and literacy and numeracy gains.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals, and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on-screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Emergency Shelters: HUD defines emergency shelter as any facility with overnight sleeping accommodations. The primary purpose is to provide temporary shelter for the homeless in general or specific populations of homeless persons. The length of stay can range from one night up to as much as three months or more. Local emergency shelters include:

- A total of 1,318 emergency shelter beds that serve the Central SPA, where the city of Garden Grove is located.

Transitional Housing: HUD defines transitional housing as a program that is designed to provide housing and appropriate support services to homeless persons to facilitate movement to independent living within 24 months. Local transitional housing facilities include:

- Grandma's House of Hope (Men's Bridge) - 10 beds
- Thomas House - 64 beds
- There are a total of 578 transitional housing beds that serve the Central SPA where the city of Garden Grove is located.

Permanent Supportive Housing (PSH): HUD defines PSH as long-term, community-based housing and supportive services for homeless persons. PSH intends to enable special needs populations to live as independently as possible in a permanent setting. The supportive services may be provided by the organization managing the housing or provided by other public or private service agencies. PSH programs in Orange County include:

Shelter Plus Care (S+C) - is provided through the Orange County Housing Authority (OCHA) and is designed to assist homeless disabled individuals and families by providing safe permanent

housing. In addition, PSH assists the homeless individual maintain residential stability, increase their life skills, obtain greater self-sufficiency and advance the goals of ending chronic homelessness. In 1997, OCHA received the first grant award to serve 35 homeless, disabled households. OCHA currently administers 13 tenant-based and two project-based S+C grant projects, which provide rental assistance and supportive services for over 600 formerly homeless and disabled households through a collaborative effort between OCHA and various care providers throughout Orange County.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Special needs groups were mentioned and broken down in the Needs Assessment section above. This section outlines the facilities available to these groups in the city of Garden Grove and within Orange County.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

As described in the NA-45 Non-Homeless Special Needs Assessment, supportive housing services are needed for the City's elderly, persons with disabilities, developmentally disabled persons, persons with addictions, and those living with HIV/AIDS. Elderly persons may require long-term supportive housing that includes long-term assisted living, transportation, and nursing care. While many disabled persons can live and work independently within a conventional housing environment, more severely disabled individuals require a group living environment where supervision is provided. The most severely disabled individuals may require an institutional environment where medical attention and physical therapy are provided. Those suffering from substance abuse might require counseling or case management and a short-term housing solution while undergoing rehabilitation. Other more challenging or on-going conditions might require supportive services that include long-term assisted living, as well as transportation and nursing care. Persons with HIV are often able to live independently as advances in medical treatment enable persons with HIV to lead normal lives. However, persons living with AIDS may require long-term supportive housing as their health conditions deteriorate and impact their ability to work.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

In 2016, the County of Orange was approved through the State of California's Department of Health Care Services (DHCS) to implement the Whole Person Care (WPC) Pilot Program. WPC is a five-year project that coordinates physical health, behavioral health, and social services in a patient-centered approach. WPC aims to improve health and well being through more efficient

and effective use of resources for Medi-Cal beneficiaries struggling with homelessness. WPS coordinates hospitals, Cal Optima, 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.

The County's program includes the development of WPC Connect, which alerts participating entities when a patient experiencing homelessness enters an emergency room. Upon notification of a non-urgent situation, the County's community partner connects the individual to recuperative care or other supportive services, which may include: one on one support through a Cal Optima care coordinator, coordinated entry into permanent supportive housing, linkage to mental health and substance use disorder treatment and a community referral network.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified by 91.215(e) concerning persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The funding allocations for FY 2020-21 will be focused on specific projects addressing high community priorities and producing tangible community benefits. To this end, the City will fund the following projects over the next year:

1. **Administration and Planning** - Provide for necessary planning and administration activities for the CDBG, HOME, and ESG programs.
2. **Special Resource Team** – Street Outreach services to Garden Grove Homeless individuals. Connect homeless residents to shelter and essential services.
3. **Senior Center** - Services provided by the H. Louis Lake Senior Center designed to support Garden Grove senior citizens will benefit approximately 300 individuals.
4. **Community SeniorServ** - Home-delivered and congregate meals provided to 260 Garden Grove seniors.
5. **Senior Center Rehabilitation** – CDBG funds to rehabilitate the H. Louis Lake Senior Center.
6. **Maureen Drive Rehabilitation** – CDBG funds will be used to rehabilitate local residential streets.

7. **Home Improvement Grant** – Provides decent and affordable housing through grants to low-income Garden Grove residents and seniors for home repair activities. Approximately 40 households will benefit from the Home Improvement Grant Program.
8. **Small Business Assistance Program** - Promote economic development by giving loans to Garden Grove businesses in exchange for hiring low-income workers. The project will benefit Garden Grove businesses and assist approximately 16 businesses throughout the year.
9. **New Construction of Affordable Housing** - Improve and promote affordable housing by increasing the affordable housing stock.
10. **Acquisition/ Rehabilitation of Affordable Housing** - This project will increase, improve, and preserve affordable housing.
11. **ESG 20 Garden Grove** - Promote programs that address the needs of homeless persons and those at-risk of becoming homeless.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified by 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The projects mentioned in the previous question also cover special needs groups.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Housing Regulations are enforced to ensure proper urban planning, however, these policies can be a hindrance to the growth of the housing stock. According to the city of Garden Grove Housing Element (2014-2021), they include the following:

Development Fees - The City charges planning fees to process and review plans for residential projects and also charges impact fees to ensure that infrastructure and facilities are in place to serve these projects. These fees include: a zone change of \$2,700, planned unit development review of \$4,725, and site plan review of \$3,375, to name a few. The City has designed their fees to recoup City costs associated with the review and approval of proposed projects. These fees may increase the cost of building affordable housing in the jurisdiction. It is worth noting that these fees are much lower in Garden Grove compared to neighboring jurisdiction (Fountain Valley, Santa Ana, Stanton, and Westminster).

Development Review and Permit Processing - These are necessary steps to ensure that residential construction proceeds in an orderly manner. However, the time and cost of permit processing and review can be a constraint to housing development if they place an undue burden on the developer. The review process in Garden Grove takes approximately 4 to 6 weeks for a typical single-family project, 6 to 8 weeks for a typical multi-family project, and approximately 10 to 12 weeks for a planned unit development. To improve the permit process, the City has created its one-stop counter and streamlined process.

Environmental Review Process - Environmental factors such as the presence of sensitive biological resources and habitats or geological hazards can constrain residential development in a community by increasing costs and reducing the amount of land suitable for housing construction. State law (California Environmental Quality Act, California Endangered Species Act) and federal law (National Environmental Protection Act, Federal Endangered Species Act) require an environmental review of proposed discretionary projects (e.g., subdivision maps, use permits, etc.). Costs resulting from the environmental review process are added to the cost of housing.

Loopholes by Public Policies - The Tenant Protection Act (AB 1482) was enacted in October 2019, protecting renters from paying high rents, however, the law came into effect on the 1st of January 2020 since it did not receive a two-thirds majority vote. During the 85-day waiting period, there has been a need to issue temporary eviction moratoriums across the state of California by various cities to stop the eviction of tenants due to the 30-day notice period required for eviction. This has rendered several lower-income renters homeless and in need of emergency housing.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Economic growth and development drive various factors including incomes and housing costs. Educational attainments also determine the level of income. The purpose of this section is to show how the level of education affects employment type. This, in turn, affects the level of income and the type of housing a household can afford to occupy. This section explores the level of economic development in Garden Grove.

Economic Development Market Analysis

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs fewer workers %
Agriculture, Mining, Oil & Gas Extraction	559	29	1	0	-1
Arts, Entertainment, Accommodations	10,467	7,225	15	16	1
Construction	3,898	2,401	6	5	0
Education and Health Care Services	10,664	8,179	15	18	3
Finance, Insurance, and Real Estate	4,116	1,237	6	3	-3
Information	1,304	1,256	2	3	1
Manufacturing	10,958	7,485	15	17	1
Other Services	2,566	2,242	4	5	1
Professional, Scientific, Management Services	6,256	2,040	9	5	-4
Public Administration	0	0	0	0	0
Retail Trade	8,257	6,307	12	14	2
Transportation and Warehousing	1,737	647	2	1	-1

Wholesale Trade	4,084	2,556	6	6	0
Total	64,866	41,604	--	--	--

Business Activity

Table 45 - Business Activity

Data Source:	2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
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Labor Force

Total Population in the Civilian Labor Force	89,435
Civilian Employed Population 16 years and over	89,359
Unemployment Rate	6.2
Unemployment Rate for Ages 16-24	28.9
Unemployment Rate for Ages 25-65	5.2

Table 46 - Labor Force

Data Source:	2013-2017 ACS
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Occupations by Sector	Number of People
Management, business and financial	14,400
Farming, fisheries and forestry occupations	3,850
Service	10,735
Sales and office	19,825
Construction, extraction, maintenance and repair	7,440
Production, transportation and material moving	6,395

Table 47 – Occupations by Sector

Data Source:	2011-2015 ACS
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Travel Time

Travel Time	Number	Percentage
< 30 Minutes	44,846	56%
30-59 Minutes	28,029	35%
60 or More Minutes	7,207	9%
<i>Total</i>	<i>80,083</i>	<i>100%</i>

Table 48 - Travel Time

Data Source:	2013-2017 ACS
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Education:

Educational Attainment by Employment Status (Population 25 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	15,303	871	7,407
High school graduate (includes equivalency)	16,113	1,218	5,377
Some college or Associate's degree	21,364	1,052	5,587
Bachelor's degree or higher	17,133	722	2,403

Table 49 - Educational Attainment by Employment Status

Data Source:	2013-2017 ACS
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Educational Attainment by Age

	Age					Qualifications Total
	18-24 yrs.	25-34 yrs.	35-44 yrs.	45-65 yrs.	65+ yrs.	
Less than 9th grade	142	1,541	3,513	7,405	4,612	17,213
9th to 12th grade, no diploma	1,784	2,395	3,037	5,690	2,653	15,559
High school graduate, GED, or alternative	5,120	4,875	6,102	11,738	5,790	30,025
Some college, no degree	8,095	6,034	4,725	10,649	4,494	33,997
Associate's degree	1,209	1,794	1,847	2,968	1,380	9,198
Bachelor's degree	1,716	5,810	3,601	6,025	2,919	20,071
Graduate or professional degree	41	1,342	1,371	2,109	1,249	6,112
Age Totals	18,107	23,791	24,196	46,584	23,097	

Table 50 - Educational Attainment by Age

Data Source:	2013-2017 ACS
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Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	21,040- 34% of AMI
High school graduate (includes equivalency)	26,931 – 43% of AMI
Some college or Associate's degree	35,828- 57% of AMI
Bachelor's degree	46,460- 74% of AMI
Graduate or professional degree	70,506- 112% of AMI

Table 51 – Median Earnings in the Past 12 Months

Data Source:	2013-2017 ACS
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Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The three major employment sectors in the city of Garden Grove with the largest share of workers are: manufacturing with 10,95; education and healthcare services with 10,664; and arts, entertainment, and accommodations with 10,467. Sectors with the greatest share of jobs are: education and health care services at 8,179, representing 18%; manufacturing at 7,485, representing 17%; and arts, entertainment, and accommodations at 7,225, representing 16%.

The biggest occupational sector in Garden Grove is in sales and office at 19,825 people. The management, business and financial sector follow at 14,400 people. This is due to the Grove District and the Anaheim Resort destinations with restaurants, convention space, commercial and industrial business opportunities and retail locations.

Describe the workforce and infrastructure needs of the business community:

The total civilian labor force in Garden Grove is 89,435 people, 59.7% of whom are employed and 16 years of age and older. The total unemployment rate is 6.2%, which is higher than the state’s 4.0% rate, with the highest rate of unemployment belongs to persons between the ages

16-24 at 28.9%. It is important to note that a portion of this age group forms part of the dependent population as some of them fall under the age of 18.

With 56% of people traveling less than 30 minutes to work, the transportation system is sufficient to cater to the present workforce. The labor forces with the highest number of employed workers are those with an Associate's Degree or equivalent. The unemployment rate represents the mismatch between the number of jobs available and the number of workers, which is greater than 6%. According to the Business Activity Table 45 above, there are a low share of jobs in the following sectors: agriculture, mining, oil, & gas; transportation and warehousing; and finance, insurance, and real estate. There is a need to diversify the economy of Garden Grove to increase job opportunities. Since some of the work in these sectors may require some technical skills, there is a need for training opportunities for the workforce to take up roles in these industries.

To this end, the City of Garden Grove Office of Economic Development provides programs that facilitate a partnership with the business community through the Chamber of Commerce. The goal is to retain and attract companies in Garden Grove by providing support, economic incentives, and development opportunities.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support, or infrastructure these changes may create.

The following is a summary of planned and existing projects in Garden Grove that will boost the economy:

Cottage Industries - Shaheen Sadeghi, who created "anti-malls" in Costa Mesa and revitalized downtown Anaheim with the Packing House and Center Street Promenade, is buying and leasing 17 parcels, mostly houses, that will be transformed into small businesses. Sadeghi's vision is to create a vibrant downtown for Garden Grove. The plan is to preserve these buildings

by converting them into art galleries, restaurants, yoga and coffee shops. This will greatly boost tourism in the city.

SteelCraft Garden Grove - An outdoor urban eatery built primarily out of 22 repurposed shipping containers. The 20,000 square-foot craft food and drink gathering space houses 10 unique small businesses consisting of boutique eateries, a brewery, wine vendor, micro-retail space, incubator space, and a vintage arcade. SteelCraft Garden Grove celebrated its grand opening on September 26, 2019. The property is located in Garden Grove's downtown area and has created over 100 new jobs.

BN Group - The City approved the sale of the City-owned real property consisting of approximately 1.45 acres, which is located at 13650 Harbor Boulevard. The developer is BN Group and they have secured a franchise agreement for the development of a Home 2 Suites by Hilton hotel. The developer has completed entitlements and construction drawings for a new 124-room hotel. The ground breaking ceremony was held on **June 27**, 2010. The hotel began construction in the 1st quarter 2019. This project is the first new hotel to be built south of the Garden Grove Freeway.

The Brookhurst Triangle Development - The largest residential and commercial multiphase mixed-use development in the city consisting of a minimum of 80,000 square feet and up to 200,000 square feet of commercial/retail space, and a maximum of 600 residential units and boutique hotel. The master plan for the project includes residential rental units, for-sale condominiums, and up to 120 affordable housing units.

The Nickelodeon Resort -This is a public-private partnership between the City of Garden Grove and Kam Sang Company. Comprising a 600-room resort hotel with 500 guest rooms and 100 timeshare units, a resort pool, and Nickelodeon amenities, the project will also include above and below-grade structured parking of approximately 350,000 square feet. Also, the development will feature approximately a 10,000 square foot spa, 3,000 square foot fitness center, 6,000 square foot arcade, 17,000 square feet of restaurant space, 4,500 square foot studio, 1,950 square feet of retail space, 25,400 square foot of meeting space and a 10,600

square foot office. Additionally, the development will feature a resort pool with water features of approximately 2.5-4 acres.

Site C - The Site C project is a resort hotel campus that has entitlements to build two hotel towers, a 398 key hotel and a 371 key hotel. The development will include approximately 40,000 square feet of restaurant/retail and entertainment space, a stand alone restaurant pad, conference/meeting space and a 1,221 space parking structure. Upon completion, it is anticipated the project will generate approximately \$3.8 to \$4.9 million in additional annual tax revenue for the City.

There will need to be plans to expand infrastructure developments including drainage, roads, pavements and streetlights for the planned developments. There will also need to be plans to expand city services such as waste collection and management and security to these areas.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The 45-65 year old range of workers represents the highest number of persons for every academic category, with a total of 46,584 workers. This also shows that part of the senior population still makes a significant part of the workforce, especially due to their academic qualifications. People with some college and no degrees represent 33,997 workers in Garden Grove and form the highest category of educational attainment in the city.

The largest occupational sectors in Garden Grove are sales and office, and management, business and finance, which may not require specialized training. However, sectors such as healthcare still require specialized training to increase the number of workers which may be necessary due to the population increase that is driving prospective workers to Garden Grove.

The City of Garden Grove will continue to work with local educational institutions, employers, real estate developers, and other stakeholders to review changes in Garden Grove's workforce needs and anticipate changes occurring in employment demands.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges, and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Several workforce training initiatives and programs are available to Garden Grove residents that will help meet the service needs of the community, as described in this Consolidated Plan. The Orange County One-Stop Centers provide comprehensive employment and training services, including a resource center with access to computers, fax machines, copiers, and telephones. Other services include a resume distribution program, veteran transition services, a career resource library, labor market information, networking opportunities, job search workshops, on-site interviews with local employers, transferable skills information, job leads, and training programs. There are programs for youth, older workers, and people with disabilities, adults, and veterans.

The Garden Grove Chamber of Commerce is a non-profit, non-governmental, and voluntary membership organization of local businesses and leaders interested in enhancing the Garden Grove community. The Chamber of Commerce serves as the link between businesses, local government, neighborhood associations, and the general public. Chamber members can mutually aid each other in promoting and producing business, as well as aid the community by providing important services and tax revenues.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The Orange County Community Services Division (OCCS) prepares the Orange County Comprehensive Economic Development Strategy that provides the framework required for entities and projects in Orange County to be eligible to receive the U.S. Department of Commerce, Economic Development Administration (EDA) funding every five years. The 2019-

2023 Orange County Comprehensive Economic Development Strategy (CEDS) identifies some of the major trends impacting Orange County which include:

- Technological advances, such as social media, e-commerce, and automation, which are currently disrupting many traditional industries;
- A surging housing market representing tremendous economic growth while simultaneously creating affordability concerns for many residents; and
- Near record-low unemployment rates and significant employment growth in traditional and emerging industry sectors.

The 2019 CEDS Report provides a blueprint designed to bring together the public and private sectors in the creation of a roadmap to diversify and strengthen the regional economy by aligning efforts to arrive at common countywide goals, which include:

- Addressing the skills gap and the discrepancies between employer needs and employee skills, by better aligning education and training programs with the current job market;
- Promoting key industry clusters that drive economic growth and innovation in Orange County and making Orange County more competitive in an interconnected global economy;
- Maintaining and improving county infrastructure;
- Improving conditions in Orange County's "Red Zone" areas with higher than average unemployment and lower than average per capita income.

Garden Grove's economic development goals are closely aligned with the County's CEDS, which are: increase the local tax base, create and retain jobs within the City, address sales tax leakage, diversify the sales tax base, create new markets within the City, and build local and regional relationships to aid in the advancement of the economic development mission. The Garden Grove Chamber of Commerce is also providing resources and incentives that drive economic growth within the city.

Discussion

Refer to the discussion above.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (Include a definition of "concentration")

Housing problems would likely be concentrated or are highest in neighborhoods with extremely low, very low, and low-income households. Due to the high housing cost burden, they are likely to lack surplus income that can be used to rehabilitate their housing stock. Looking at the map below, the darkest areas have the greatest housing problems, which are an indicator of where low-income homes are located. The Northwestern and Western part of Garden Grove have a poverty index of 70.1%-100%. Parts of the Northern, Eastern and Southern parts of the city have a lower poverty index of about 40.1%-60%. The Northern, Eastern and Southern parts of the city are densely populated compared to the Western parts of Garden Grove. Housing problems are likely experienced more in these densely populated areas.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (Include a definition of "concentration")

Areas with concentrations of minority residents may have different needs, particularly in areas where recent immigrants tend to reside. Concentration, in this case, refers to the locations where racial groups live in greater frequency than the population as a whole. As previously mentioned, racial or ethnic groups are evenly distributed in the city. The exception is for the West to North West portion of the city, where White households live at a greater frequency, and the East where Hispanic households represent the majority. Asian/Pacific islander households are located at a higher frequency in the Central and Southern parts of the city.

What are the characteristics of the market in these areas/neighborhoods?

These neighborhoods are likely to have lower-income families earning 0-80% of the Area Median Income. These households characteristically have a fixed income and therefore lack the financing to rehabilitate their homes.

Are there any community assets in these areas/neighborhoods?

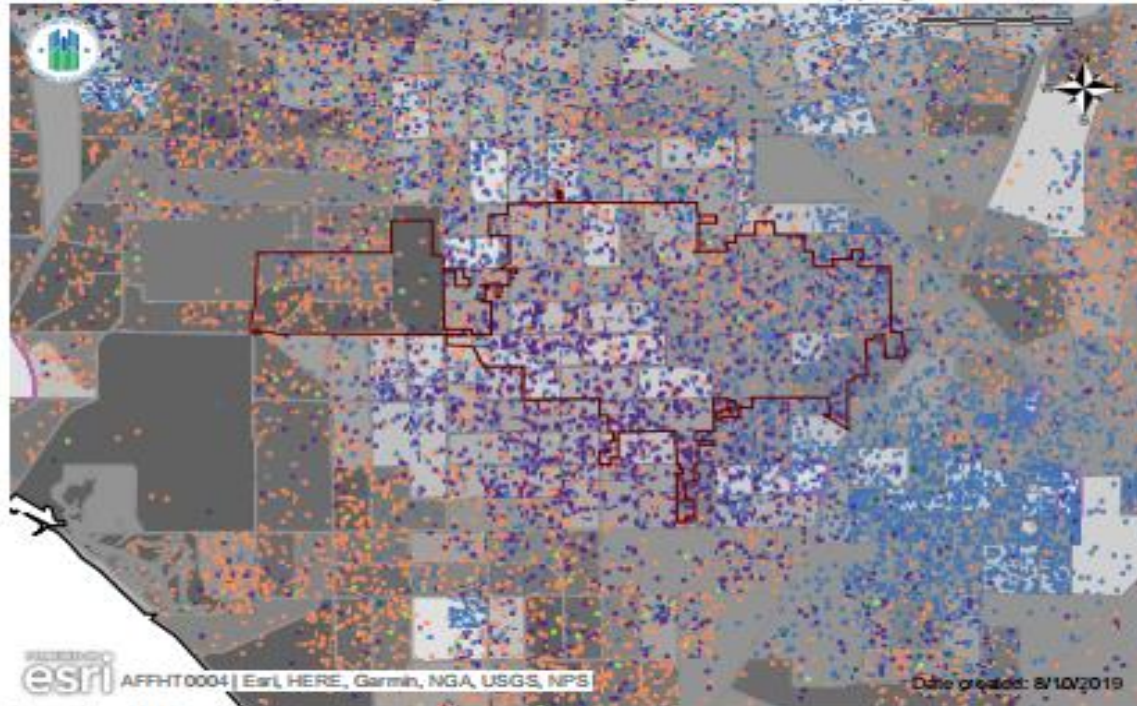
Garden Grove strives to have community assets in all areas of the city. Schools, parks, recreational centers, shopping, libraries, public transportation, police and fire stations, are

found throughout the city, including areas with concentrations of lower-income households. The city has a network of active and dedicated nonprofit organizations and community groups that work to address the housing and community development needs in these neighborhoods and the city at large. Many of the lower-income areas are located within a short distance of these organizations along major corridors.

Are there other strategic opportunities in any of these areas?

The City will continue to work closely with its partners—from nonprofit housing and service providers to private sector developers and other local agencies in Orange County—to ensure services and programs are delivered in an effective and efficient manner and provide assistance to those who are most in need.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



- Legend**
- Jurisdiction**
□
 - Region**
□
 - Demographics 2010**
1 Dot = 75
 - White, Non-Hispanic
 - Black, Non-Hispanic
 - Native American, Non-Hispanic
 - Asian/Pacific Islander, Non-Hispanic
 - Hispanic
 - Other, Non-Hispanic
 - Multi-racial, Non-Hispanic

- TRACT**
□
- R/ECAP**
□
- Low Poverty Index**
 - 0 - 10
 - 10.1 - 20
 - 20.1 - 30
 - 30.1 - 40
 - 40.1 - 50
 - 50.1 - 60
 - 60.1 - 70
 - 70.1 - 80
 - 80.1 - 90
 - 90.1 - 100

esri AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 8/10/2019

Name: Map 12 - Demographics and Poverty
Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Garden Grove (CDBG, HOME, ESG)
Region: Los Angeles-Long Beach-Anaheim, CA
HUD-Provided Data Version: AFFHT0004

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Garden Grove 2020-2025 Consolidated Plan describes the City's strategy for addressing housing and community development needs to enhance the quality of life for community members through the use of CDBG, HOME, and ESG funds. The 5-Year Housing and Community Development Strategic Plan is the focal point of this Consolidated Plan, laying out a specific course of action to accomplish housing and community development goals and objectives. The Strategic Plan describes:

1. Priorities for assisting households in Garden Grove;
2. Programs to assist those households;
3. 5-year objectives that identify planned accomplishments.

Also, the Strategic Plan describes the institutional structure for carrying out the Consolidated Plan, discusses the City's anti-poverty strategy, and describes efforts to reduce barriers to affordable housing and lead-based paint hazards.

Priority Goals

The CDBG and HOME programs have a stated national goal to support the development of viable urban communities by funding programs that provide decent housing, suitable living environments, and expansion of economic opportunities, principally for persons of low and moderate-income. The ESG program is designed to provide emergency and transitional housing in addition to supportive services for the homeless and those at risk of becoming homeless. The City of Garden Grove intends to pursue national goals through the implementation of this Strategic Plan. Thus, the City will allocate CDBG, HOME, and ESG funds for the support of community planning, development, and housing programs and activities directed toward achieving the following priorities:

- Provide decent and affordable housing;
- Address the needs of homeless individuals and those at risk of homelessness;
- Provide community and support services;
- Address public facilities and infrastructure needs;
- Promote economic development and employment opportunities;
- Provide for planning and administration activities.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Not applicable. The City of Garden Grove has not established any geographic priority areas.

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA).

The City has not established specific target areas to focus the investment of CDBG funds at this time. In terms of the specific geographic distribution of investments, infrastructure improvements and public facilities will be focused primarily in areas with concentrations of lower-income populations. Appendix B contains a map and a list of applicable census block groups that illustrate the lower-income areas in the City (defined as a block group with at least 51% of the population with incomes not exceeding 80% of the Area Median Income or AMI). Investments in public facilities and services for special needs populations and primarily lower-income persons will be made throughout the city. Housing assistance will be available to income-qualified households citywide. The City will evaluate eligible projects and programs based on the urgency of need, availability of other funding sources, and financial feasibility.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 53 – Priority Needs Summary

1	Priority Need Name	Increase, Improve, and Preserve Affordable Housing
	Priority Level	High
	Population	Extremely Low Income Low Income Large Families Families with Children Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	Citywide
	Associated Goals	Provide Decent and Affordable Housing
	Description	The provision of affordable housing for lower-income households is a key concern due to the high cost of housing in Garden Grove. Encouraging and facilitating the production of affordable housing allows persons of all economic segments to live in the community. The City will continue to take an active role in the production, preservation, and improvement of affordable housing through acquisition/rehabilitation of rental units, rehabilitation assistance to low-income homeowners, and abatement of substandard housing conditions, including addressing lead-based paint hazards. When funding is available, the City will support homeownership programs as a means of augmenting the City’s affordable housing stock.
	Basis for Relative Priority	Approximately 61% of the City's households are lower-income households earning less than 80% AMI, and may require assistance to maintain their homes or afford their rents. Since the majority of the housing stock is older (built during the 1950s), there remains an ongoing need for housing rehabilitation activities and assistance. Furthermore, almost a quarter of the housing units are overcrowded, which accelerates deterioration of

		<p>housing. With 13,800 applicants on the Section 8 waiting list, the City recognizes the continuing demand for affordable housing and will continue to seek opportunities to increase and preserve the supply of affordable housing through rehabilitation and acquisition of properties to provide additional affordable units.</p> <p>In addition, the price of housing has significantly outpaced income growth in the past decade, making homeownership out of reach for households with lower incomes (less than 80% of the AMI). While funding resources are very limited, Garden Grove will actively seek federal and state housing program funds to assist lower-income households to achieve homeownership.</p>
2	Priority Need Name	Promote New Construction of Affordable Housing
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Large Families Families with Children Elderly Frail Elderly
	Geographic Areas Affected	Citywide
	Associated Goals	Provide Decent and Affordable Housing
	Description	To help address the shortage of new affordable housing in the community, Garden Grove will promote and facilitate new construction of affordable housing. While funding resources in this endeavor are limited, particularly after the loss of Redevelopment Agencies in California, Garden Grove will continue to support new projects that include affordable housing through targeted policies to facilitate such developments and use of available funds.
	Basis for Relative Priority	With the loss of Redevelopment in 2012, the City has limited resources to create new affordable housing units. However, due to the high need for affordable housing in Garden Grove and the region as a whole, the City will strive to leverage any available funds, such as HOME funds, to facilitate the

		development of new affordable housing. In particular, affordable senior housing is a key need in the community, as evidenced by the rapid leasing of units in new senior developments. There are currently 400 units of senior housing being built on Garden Grove Boulevard. The growing need for affordable senior housing will continue as the population ages. In addition to leveraging available funds, the City provides density bonuses and streamlined review for projects involving affordable housing to facilitate development of this housing product.
3	Priority Need Name	Provide Rental Assistance to Alleviate Cost Burden
	Priority Level	High
	Population	Extremely Low Income Low Income Large Families Families with Children Homeless Individuals and Families Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	Citywide
	Associated Goals	Provide Decent and Affordable Housing
	Description	The City will provide rental assistance to lower-income renter households to alleviate rental cost burden.
	Basis for Relative Priority	The Garden Grove Housing Authority administers the Section 8 Housing Choice Voucher program in the City. Section 8 program participants and applicants are extremely low- and very low-income households (with incomes less than 50% AMI). As of February 2020, there were approximately 2,200 households receiving rental assistance through the Section 8 program and 13,800 households on the waitlist. To assist the need demonstrated by the waitlist, the City supports a Tenant Based Rental Assistance program.

4	Priority Need Name	Promote Programs to Meet Homeless Needs
	Priority Level	High
	Population	Extremely Low Income Low Income Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Citywide
	Associated Goals	Address the Needs of Homeless and Those At Risk
	Description	Address the needs of homeless individuals and those at risk of homelessness through allocation of ESG funds to support local efforts to prevent and address homelessness. The City will also continue to participate in the Orange County Continuum of Care System for the Homeless.
	Basis for Relative	It is estimated that two to three families are on the verge of homelessness for every family in a shelter. The "at-risk" population is comprised of families and

	Priority	<p>individuals living in poverty who, upon loss of employment or other emergency requiring financial reserves, would lose their housing and become homeless. Families in this situation are generally experiencing a housing cost burden, paying more than 30% of their income for housing. According to the 2011 CHAS, 83% of the City’s extremely low-income renter-households and 71% of the extremely low-income owner-households were spending more than 30% of their income on housing. These households are very vulnerable to sudden change in financial situations and could have the potential to become homeless. Furthermore, approximately 31% of female-headed families are living below the poverty level, making these households particularly vulnerable to homelessness.</p> <p>Another at-risk population group includes veterans who may face difficulty paying rent or maintaining jobs due to posttraumatic stress disorder or other mental health issues. Veterans comprised 4.5%of the countywide homeless population in 2019. Individuals released from penal, mental, or substance abuse facilities are also at risk if they cannot access permanent housing or lack an adequate support network, such as a family or relatives in whose homes they could temporarily reside.</p> <p>Another particularly vulnerable population is foster care youth. Upon reaching 18 years of age, foster youth lose eligibility for many public services and are often released without the skills necessary to obtain employment and a place to live. Several agencies throughout the county provide temporary housing and services to abused, neglected, abandoned, and/or runaway children. Once these children reach legal adult age, the services provided by these agencies cannot continue. It is important to ensure that these young adults do not age out of their program into a life of homelessness.</p>
5	Priority Need Name	Preserve and Improve Existing Supportive Services
	Priority Level	High
	Population	Extremely Low Income Low Income Large Families Families with Children Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities

		Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Citywide
	Associated Goals	Provide Community and Supportive Services
	Description	The City will preserve and improve existing community supportive services for special needs groups, in particular seniors, lower-income households, and youth. An overarching need for all special needs groups is anti-crime and safety programs to improve general safety and well-being. The City will also continue to address community safety for all community members, including special needs groups, by supporting crime prevention efforts.
	Basis for Relative Priority	The City has a large number of lower-income households with extensive needs for a variety of supportive services. Based on community input and analysis of needs for community services, the City will focus on crime prevention and awareness programs, services for seniors, and services for lower-income households.
6	Priority Need Name	Address Public Facilities/Infrastructure Needs
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Income Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS

		<p>Victims of Domestic Violence</p> <p>Unaccompanied Youth</p> <p>Elderly</p> <p>Frail Elderly</p> <p>Persons with Mental Disabilities</p> <p>Persons with Physical Disabilities</p> <p>Persons with Developmental Disabilities</p> <p>Persons with Alcohol or Other Addictions</p> <p>Persons with HIV/AIDS and their Families</p> <p>Victims of Domestic Violence</p>
	Geographic Areas Affected	Citywide
	Associated Goals	Address Public Facilities and Infrastructure Needs
	Description	The City will improve neighborhoods through public facilities and infrastructure improvements. While public facilities and infrastructure improvements are primarily addressed through the City's Capital Improvement Program by the Public Works Department, when funding is available from federal resources such as CDBG, the City will help support improvements to public facilities and infrastructure in income-eligible areas.
	Basis for Relative Priority	<p>Infrastructure improvements are CDBG-eligible activities in lower-income areas, which constitute a majority of the City. Much of the City's infrastructure, including roads and sidewalks, were built over 30 years ago and are now in need of replacement or repair. In addition, as the City is largely characterized by families with children, parks and recreational facilities are well used and in high demand. Maintenance and improvement of the City's facilities and infrastructure is thus an important need for special needs groups in the community.</p> <p>CDBG funds have been utilized in the past on a limited basis to finance street maintenance and construction of new facilities within CDBG income-eligible areas. For the most part, however, the Public Works Department (charged with the planning and operation of capital improvements that lie within the public right-of-way) relies on General Fund monies; County, State, and Federal expenditures; and grants to fund most infrastructure improvements.</p>
7	Priority Need Name	Promote Economic Development and Employment Opportunities

	Priority Level	Medium
	Population	Extremely Low Income Low Income Moderate Income Large Families Families with Children Individuals Families with Children Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Citywide
	Associated Goals	Promote Economic Development and Employment Opportunities
	Description	The City will promote economic development and employment opportunities by supporting programs that increase jobs and stimulate economic growth and vitality in the City.
	Basis for Relative Priority	Job training and placement services are a critical need for the unemployed population, as are housing assistance and other social services. Upon availability of funds, the City will also support and invest resources in economic development project(s) that stimulate business growth and create jobs. Improved economic health will yield additional resources for the provision of services for the City's special needs groups, in addition to providing employment opportunities for unemployed residents.
8	Priority	Provide for Necessary Planning and Administration

Need Name	
Priority Level	High
Population	Extremely Low Income Low Income Moderate Income Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
Geographic Areas Affected	Citywide
Associated Goals	Provide for Planning and Administration Activities
Description	The City will provide for necessary planning and administration activities to address housing and community development needs in the City. The City will implement the goals and objectives of the Consolidated Plan by delivering a variety of housing and community development programs and activities. The City will continue to administer the CDBG, HOME, and ESG programs in

		<p>compliance with program regulations and requirements.</p> <p>In addition, the City will actively promote services provided by the City’s fair housing provider at public counters, on the City’s website, etc. The City will also continue to comply with fair housing planning requirements (Analysis of Impediments to Fair Housing Choice) and incorporate actions in the annual Action Plan.</p>
	<p>Basis for Relative Priority</p>	<p>To ensure the effective use of limited CDBG and HOME funds, the City must allocate money towards planning and monitoring.</p> <p>The City enforces State and Federal fair housing laws. To achieve fair housing goals, Garden Grove has contracted with a fair housing service provider to provide information, mediation, and referrals to residents. Additionally, the City also collaborates with other Orange County municipalities and the County of Orange to complete a comprehensive Regional Analysis of Impediments to Fair Housing Choice. Included in promoting fair housing, the City will continue to work toward providing and maintaining equal housing opportunities for special need residents.</p>

Narrative (Optional)

Through the community survey, the following needs were identified as the highest priority areas in Garden Grove:

- Increase, Improve, and Preserve Affordable Housing;
- Promote New Construction of Affordable Housing;
- Provide Rental Assistance to Alleviate Cost Burden;
- Promote Programs to Meet Homeless Needs;
- Preserve and Improve Existing Supportive Services;
- Address public facilities and infrastructure needs;
- Promote economic development and employment opportunities;
- Provide for necessary planning and administration activities.

These priority needs have formed the goals that the city has set over the next 5 years. The disbursement and expenditure of CDBG, HOME, and ESG grants will be based on the following criteria:

- High Priority: The City will make every effort to address this need using available CDBG or HOME funds during the next 5 years.
- Low Priority: If additional CDBG or HOME funds are available, activities to address this need may be funded by the City during these 5 years.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Given the high demand for rental assistance in the City indicated by the 2,200 households participating in the Housing Choice Voucher (Section 8) program and the 13,800 person waitlist, the City plans to utilize HOME funds for Tenant Based Rental Assistance (TBRA) for individuals experiencing homelessness and those at risk of homelessness.
TBRA for Non-Homeless Special Needs	The high demand for rental assistance in the City is indicated by the 2,200 households participating in the Housing Choice Voucher (Section 8) program and the 13,800-person waitlist. The City plans to utilize HOME funds for Tenant Based Rental Assistance (TBRA). The TBRA Program will be for very low- and extremely low-income households, as these households are most in need in the City, as described in the Needs Assessment.
New Unit Production	The majority of the City's lower- and moderate-income households experience housing cost burden. The supply of affordable housing is limited compared to the need. Based on funding availability and allocations, the City will allocate a portion of the HOME funds to increase the supply of safe, decent, affordable housing for lower-income households (including extremely low-income households), such as seniors.
Rehabilitation	About 79% of the City's housing stock is at least 30 years of age, indicating a significant need for rehabilitation. The City will provide assistance to rehabilitate single-family units and multi-family units. This will be included in the annual Action Plans.
Acquisition, including preservation	The City has traditionally been active in increasing and preserving the supply of affordable housing through acquisition and rehabilitation of properties. While funding resources are limited, the City has been effective in working with several nonprofit organizations and developers to produce affordable units through acquisition and rehabilitation. The City enters into these partnerships not only to preserve the supply of affordable housing in the community but also to stimulate high-quality property management and neighborhood improvement.

Table 54 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

For the 5 years covering July 1, 2020, through June 30, 2025, the City has planned for the following estimated allocations:

- \$9.9 million in CDBG funds;
- \$3.9 million in HOME funds;
- \$852,000 in ESG funds.

Garden Grove does not receive funding under the Housing Opportunities for Persons with AIDS (HOPWA) programs. In estimating the amounts of funding available over this Consolidated Plan period, the City took a conservative approach to assume an annual reduction of 3 percent.

In terms of program income, the City anticipates an unsteady stream of program income throughout this Consolidated Plan. During the past 5 years, the level of program income received varied from \$30,000 in one year to over \$90,000 in another. Program income received from the repayment of rehabilitation (CDBG and HOME) and first-time homebuyer (HOME) loans will automatically be re-programmed for loan activities in those same or similar programs from which the funds were originally provided to the extent possible. If additional program income funds are received that are not automatically reprogrammed, specific projects will be identified during the Action Plan process.

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	\$2,030,219		\$2,037,000	\$4,067,219	\$7,938,156	The estimated amount of CDBG funds available over the planning period is based on a 3% annual reduction, rounding down to approximately \$9.9 million over five years.
HOME	Public-Federal	Acquisition Homebuyer Assistance Homeowner Rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$803,230	\$50,000	\$2,200,000	\$3,053,230	\$3,140,629	The estimated amount of HOME funds available over the planning period is based on a 3% annual reduction, rounding down to approximately \$3.9 million over five years and anticipated program income of \$250,000 over the same five years.
ESG	Public-Federal	Conversion and rehab for transitional housing Financial Assistance Overnight Shelter Rapid-Rehousing Homeless Prevention services Homeless Management Information System management	\$174,721		\$5,442	\$180,163	\$683,159	The estimated amount of ESG funds available over the planning period is based on a 3% annual reduction, rounding down to approximately \$860,000 over five years.

Table 55 - Anticipated Resources

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

As is the case for many communities across the nation, the housing and community development needs in Garden Grove surpass the funding available to meet those needs. Therefore, effective and efficient use of limited funds is crucial, and leveraging multiple funding sources is often necessary to achieve housing and community development objectives. Most activities to be pursued by the City with CDBG, HOME, and ESG funds will be leveraged with a variety of funding sources, including grants from state, federal, and local governments, private foundations, capital development funds, general funds, private donations of funds or services, and various other funding sources. For new construction, substantial rehabilitation, and acquisition of affordable housing, the City encourages the use of Low Income Housing Tax Credits.

ESG and HOME Match Requirements:

Federal match requirements apply to the City's HOME and ESG funds. The HOME program requires that for every HOME dollar spent, the City must provide a 25% match with non-federal dollars. HUD allows the City to use various resources to meet this match requirement. The HOME match obligation may be met with any of the following eligible sources:

- Cash or cash equivalents from a non-federal source;
- Value of donated land or real property;
- A percentage of the proceeds of single- or multi-family housing bonds issued by a state, a state instrumentality, or local government;
- Value of donated materials, equipment, labor, and professional services; or
- Sweat equity.

According to HOME program guidelines, no more than 25% of the City's match liability for any one year can be met through loans to housing projects, but amounts over what may be banked as match credit for future years. The City has an excess of match funds from previous years.

The ESG program requires that for each dollar of the City's ESG grant in any given year, the City must provide a 100% match with non-federal dollars. Garden Grove will continue to require its ESG partners to leverage non-federal funds and report their successes with each quarterly performance report. ESG partners may count the following as matching resources:

- Grants from other sources;
- Salary paid to staff (not included in the award) to carry out the project of the recipient;
- Time contributed by volunteers;
- The value of any donated material or building, or any lease, calculated using a reasonable method to establish a fair market value.

Garden Grove Housing Authority

The Garden Grove Housing Authority provides rental subsidies for eligible low-income (50% MFI) families with federal grant funds from the Section 8 Rental Assistance Program through the Department of Housing and Urban Development. The Housing Authority assists over 2,200 low-income families. Congress determines the funding level for this program annually. Currently, funding is approximately \$35.5 million per year.

The Garden Grove Housing Authority also administers a Family Self-Sufficiency Program, which assists housing participants in achieving economic self-sufficiency through education, training, and employment. Approximately 44 very low-income families are involved in the program per month, which is currently funded at \$69,380 per year.

CalHome Grants

CalHome Grants are given to local public agencies and nonprofit developers to assist individual households through deferred-payment loans. The grants are given to local public agencies or nonprofit corporations for first-time homebuyer down payment assistance, home rehabilitation, self-help mortgage assistance, or technical assistance for self-help homeownership programs. The City is committed to applying for CalHome funding in the future and plans to utilize the remaining funds in the reuse account on CalHome activities during this Consolidated Planning cycle.

Workforce Initiative Subsidy for Homeownership Grant

Under the Workforce Initiative Subsidy for Homeownership (WISH) Program, the Federal Home Loan Bank in San Francisco sets aside a portion of its annual Affordable Housing Program contribution to provide matching grants through bank members for down payment and closing cost assistance to eligible first-time homebuyers. Through the continued partnership with Pacific Mercantile Bank, who is a member bank of Federal Home Loan Bank in San Francisco, the City will continue to leverage WISH funds for homebuyers.

Permanent Local Housing Allocation Program

In 2019, the City was awarded an annual allocation of Permanent Local Housing Allocation Program funds. The Permanent Local Housing Allocation Program is part of a 15-bill housing package aimed at addressing California's housing shortage and high housing costs. The first year of the grant is designed to assist jurisdictions with planning and administration activities, including: updating the Housing Element, creating objective development standards, creating objective development standards for supportive housing, updating the City's density bonus ordinance, creating development standards for hotel and motel conversions, updating the multi-family residential ordinance to allow by-right permanent supportive housing, and providing funding for the University of California, Irvine Housing Study.

Eligible program activities after the first year include predevelopment, development, acquisition, rehabilitation, and preservation of multifamily, residential live-work, and rental housing that is affordable to extremely low-, very low-, low-, or moderate-income households; affordable rental and ownership housing that assists households earning up to 120% AMI, or 150% AMI in high-cost areas; matching portions of funds placed into local or regional housing trust funds; matching portions of funds available through the Low- and Moderate-Income Housing Asset Fund; capitalized reserves for services connected to the preservation and creation of new permanent supportive housing; assisting persons who are experiencing or at risk of homelessness; accessibility modifications; efforts to acquire and rehabilitate foreclosed or vacant homes and apartments; homeownership opportunities; and matching funds invested by a county in an affordable housing development project.

Low-Moderate Income Housing Trust Fund

The City anticipates receiving approximately \$13M into the LMIHAF over the 5-year Consolidated Plan period. Per State regulations, up to \$250,000 per year may be expended to provide programs and services to homeless Garden Grove households. During FY 2019-2020, the City utilized \$100,000 in LMIHAF monies to subsidize the services portion of a rental assistance program for homeless households as a part of the Homeless Emergency Assistance Rental Transition (HEART) Program. The City expects to extend this program throughout the 5-year Consolidated Planning period to reduce homelessness within the jurisdiction. Remaining LMIHAF monies will be expended to produce affordable housing for low-income residents throughout the City.

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

Discussion

\$200,000 of anticipated program income over the remaining 4 Years on the Consolidated Plan is included in the \$3,145,292 expected amount available in the remainder of the Consolidated Plan.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Garden Grove	Government	Economic Development Non-homeless special needs Ownership Planning neighborhood improvements public facilities public services	Jurisdiction
Housing Authority of the City of Garden Grove	Departments and agencies	Planning Rental	Jurisdiction
Fair Housing Foundation	Regional organization	Homelessness Non-homeless special needs Ownership Rental public services	Region
211 ORANGE COUNTY	Continuum of Care	Homelessness Non-homeless special needs public services	Region

Table 56 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Lack of funding resources is the primary obstacle to meeting all of the needs identified in the Needs Assessment and those identified as priorities in this Strategic Plan. The public and private agencies, which serve the needs of low- and moderate-income residents, offer supportive housing services. In 2012 the state ended Redevelopment, taking a primary funding source from local agencies to fill the state budget shortfalls. Continued state budget shortfalls

have caused the state of California to reduce funding for local aid to cities and towns, significantly impacting the funding of local programs. Also, entitlement grants have not kept up with inflation and have been reduced over the years, further decreasing funds available to provide services and meet the City’s needs. In some cases, having a portion of the funds available from resources through the City may not do a project if sufficient public and private funds, such as Low-Income Housing Tax Credits (LIHTC) or additional development financing, are not available to the project or program.

The City of Garden Grove will continue to function in a coordinating role between local non-profit service providers and other county, state, and federal organizations, as well as regional agencies and plans such as the Orange County Continuum of Care (CoC).

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Persons Living with HIV have access to all the facilities and services offered to persons who experience homelessness. In addition to these services, homeless persons with HIV also receive short-term supportive housing from organizations such as APAIT and Radiant Health Services, which provide emergency shelter and access to healthcare.

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement	X	X	X
Mobile Clinics			
Other Street Outreach Services			

Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X

Other			
Other			

Table 57 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The needs of homeless persons have been previously discussed in the Needs Assessment and Housing Market Analysis sections. The number of services available is not sufficient to meet the needs of residents. The City continues to collaborate and work closely with local organizations to continually make progress in meeting specific objectives for reducing and ending homelessness. Some of the following activities that have been undertaken in recent years include:

- **City Net:** ESG funds for street outreach services to connect homeless individuals and families to essential services and housing;
- **Thomas House Temporary Shelter:** ESG funds to support shelter operations and essential services;
- **Mercy House:** ESG funders for shelter operations and homeless prevention services;
- **Interval House:** ESG funds for essential services for victims of domestic violence, including rapid rehousing;
- **Community SeniorServ, Inc.:** CDBG funds for senior services to support hot lunches and delivered meals;

- **Interval House (HEART):** HOME and LMIHTF funds for tenant based rental assistance and supportive services for homeless individuals and families through the Homeless Emergency Assistance Rental Transition (HEART) Program;
- **Mercy House (HEART):** HOME and LMIHTF funds for tenant based rental assistance and supportive services for homeless individuals and families through the Homeless Emergency Assistance Rental Transition (HEART) Program.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The special needs populations and homeless persons receive services that are coordinated through the Garden Grove Housing Authority as well as the Orange County Continuum of Care Homeless Management Information System (HMIS). Orange County 2-1-1 services are also a resource that links persons in need to different agencies that offer assistance. The greatest challenge the City continues to experience is the lack of funding resources.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

In May 2019, a campaign was launched in Orange County dubbed "united to end homelessness" that brought together businesses, non-profits, faith-based institutions, philanthropists and governments to create strategies that would end homelessness. Under this campaign, the Garden Grove Coalition to End Homelessness (GGCEH) was formed as a comprehensive approach for homeless persons to obtain and maintain permanent housing.

SP-45 Goals Summary – 91.215(a)(4)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Decent and affordable housing	2020	2025	Affordable Housing Homeless Non-Homeless Special Needs	Citywide	Increase, Improve, and Preserve Affordable Housing, Promote New Construction of Affordable Housing	CDBG: \$1,000,000 HOME: \$730,000	Homeowner Housing Rehabilitation: 200 Households/Housing Units Rental Units Constructed: 5 Housing Units Rental Units Rehabilitated: 20 Housing Units
2	Address the Needs of Homeless Individuals and Those At Risk of Homelessness	2020	2025	Homeless	Citywide	Promote Programs to Meet Homeless Needs, Provide Rental Assistance to Alleviate Cost Burden	ESG: \$789,000 HOME: \$2,780,000	Homeless Persons Served: 1500 Persons Assisted Tenant Based Rental Assistance (HEART & VSV): 134 Households Assisted

3	Provide Community and Supportive Services	2020	2025	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Preserve and improve Existing Supportive Services	CDBG: \$2,093,475	Special Resource Team: Assisted 1000 Homeless Individuals & 100 Street Exits for Homeless Individuals Public Service Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
4	Address Public Facilities and Infrastructure Needs	2020	2025	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Address Public Facilities/Infrastructure Needs	CDBG \$4,326,525	Low/Moderate Income Individuals Assisted: 10,000
5	Promote Economic Development and Employment Opportunities	2020	2025	Non-Housing Community Development	Citywide	Promote Economic Development and Employment Opportunities	CDBG \$500,000	Other: Land acquisition for economic development activities. Small Business Assistance Program: 80 Jobs Created or Retained

6	Provide for Planning and Administration Activities	2020	2025	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide	Provide for Necessary Planning and Administration	CDBG: \$1,980,000 (20%) HOME: \$390,000 (10%) ESG: \$63,000 (7.5%)	Not applicable.
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Goals Summary Information

Table 58 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Decent and Affordable Housing
	Goal Description	The City is focused on providing decent and affordable housing through a variety of programs as funding permits. Programs and activities to accomplish the City's goal include: new construction of affordable housing; acquisition and/or rehabilitation activities; rehabilitation assistance programs; lead-based paint hazard reduction efforts and home ownership assistance.
2	Goal Name	Address the Needs of Homeless Individuals and Those At Risk of Homelessness
	Goal Description	The City of Garden Grove will continue to use its funds to address homeless needs in the City in a manner that supports the countywide CoC system.
3	Goal Name	Provide Community and Supportive Services
	Goal Description	The City will provide for a variety of community and supportive services, with a focus on crime awareness and prevention programs and senior services. Other services may be considered if funding is available.
4	Goal Name	Address Public Facilities and Infrastructure Needs
	Goal Description	The City will coordinate improvements to public facilities and infrastructure to improve living conditions for low-income residents and neighborhoods.
5	Goal Name	Promote Economic Development and Employment Opportunities
	Goal Description	The City will promote greater employment opportunities and support of economic development activities throughout the city.
6	Goal Name	Provide for Planning and Administration Activities
	Goal Description	<p>The City will continue to administer the CDBG, HOME, and ESG programs in compliance with program regulations and requirements. To ensure the effective use of limited CDBG, HOME, and ESG funds, the City must allocate funding towards planning and monitoring of the programs.</p> <p>The City complies with state and federal fair housing laws. To achieve fair housing goals, the City has contracted with a fair housing service provider to provide information, mediation, and referrals to residents. Garden Grove will strive to provide and maintain equal housing opportunities for all residents in the City, including special needs residents.</p>

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Based on information from the Garden Grove Housing Authority, Rental assistance through section 8 vouchers will continue to be provided to the current recipients totaling up to about 2,200 people. This will also be extended to those who will be moved from the waitlist to beneficiaries, including those exempt from the waitlist process such as veterans and victims of domestic violence.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

There is no public housing in Garden Grove.

Activities to Increase Resident Involvements

Not Applicable.

Is the public housing agency designated as troubled under 24 CFR part 902?

Not Applicable.

Plan to remove the ‘troubled’ designation

Not Applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

As previously explained in Market Analysis, the following are barriers to affordable housing:

Development Fees - The fees the City charges to process and review plans for residential developments may increase the cost of building affordable housing in the jurisdiction.

Development Review and Permit Processing - The review process for building permits can be a constraint to housing development if they place an undue burden on the developer. The longer housing projects take to be built or rehabilitated, the higher the development or rehabilitation cost may become. This could also affect the affordable housing stock due to conversion to market rents.

Environmental Review Process - Environmental factors such as the presence of sensitive biological resources and habitats or geological hazards can constrain residential development in a community by increasing costs and reducing the amount of land suitable for housing construction

Legislative Barriers - The AB 1482 legislation was voted into law to prevent arbitrary rental increases on lower-income households. However, due to the 85-day waiting period before the law came into effect on the 1st of January 2020, many tenants were given eviction notices so that their homes could be converted to market rents.

Other non-governmental constraints include:

Financing - Economic conditions and national policies determine interest rates for borrowing money for residential developments as well as mortgage rates. This affects the ability to purchase or rehabilitate housing due to increased costs.

Infrastructure Constraints - Public facilities, particularly drainage and sewage, need to be updated and expanded constantly to accommodate the growing number of housing units. Deficiencies in sewer capacity, as well as land designations for this essential infrastructure, reduces land that is available for housing development.

Environmental Constraints - the city of Garden Grove is located in a region with seismic activity that may deter the development of housing within certain areas. However, it is not located within an Alquist-Priolo Special Study Zone that would affect housing production. The Alquist-Priolo Earthquake Fault Zoning Act of 1972 prevents the construction of buildings used for human occupancy on the surface trace of active faults. The act prohibits new construction of houses in California within these zones unless a comprehensive geologic investigation shows that the fault does not pose a hazard to the proposed structure.

The city of Garden Grove is within a flood zone, according to The Federal Emergency Management Agency (FEMA) maps. According to FEMA, the term "100-year flood" refers to the flood elevation level that has a 1% chance of being equaled or exceeded each year. There is a need for more investment in flood prevention when developing residential units.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Market and governmental factors pose barriers to the provision of adequate and affordable housing. These factors tend to disproportionately impact lower- and moderate-income households due to their limited resources for absorbing the costs. Garden Grove works to remove barriers to affordable housing by implementing a Housing Element that is consistent with California law and taking actions to reduce costs or provide offsetting financial incentives to assist in the production of safe, high-quality, affordable housing. The City is committed to removing governmental constraints that hinder the production of housing and offers a "one-stop" streamlined permitting process to facilitate efficient entitlement and building permit processing.

The City of Garden Grove has instituted additional actions aimed at reducing the impact of the public sector role in housing costs. City efforts to remove barriers to affordable housing include:

- Periodical analysis and revision of the zoning code aimed at developing flexible zoning provisions in support of providing an adequate supply of desirable housing, such as mixed-use zoning standards and updates to the Housing Element;

- Provision of affordable housing projects through acquisition and rehabilitation activities, and new construction of affordable housing units;
- Establishing a streamlined service counter to reduce the processing time;
- Density bonuses for affordable projects;
- Continued assessment of existing policies, procedures, and fees to minimize unnecessary delays and expenses to housing projects.

Also, the City will use its Analysis of Impediments to Fair Housing Choice (AI) report in coordination with other local jurisdictions. This report has identified any potential impediments to fair housing and has established a Fair Housing Action Plan to outline steps to overcome any identified impediments.

SP-60 Homelessness Strategy – 91.215(d)

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

Garden Grove participates in the Orange County Continuum of Care (CoC) system. For the past several years, leadership and coordination of Orange County's Continuum of Care planning process have been the shared responsibility of OC Partnership, 211 Orange County, and the Orange County Community Services Department. This public/nonprofit partnership helps ensure comprehensive, regional coordination of efforts and resources to reduce the number of homeless and persons at risk of homelessness throughout Orange County. This group serves as the regional convener of the year-round CoC planning process and acts as a catalyst for the involvement of the public and private agencies that make up the regional homeless system of care. The Orange County Continuum of Care system consists of six basic components:

1. Advocacy on behalf of those who are homeless or at-risk of becoming homeless;
2. A system of outreach, assessment, and prevention for determining the needs and conditions of an individual or family who is homeless;
3. Emergency shelters with appropriate supportive services to help ensure that homeless individuals and families receive adequate emergency shelter and referrals;
4. Transitional housing to help homeless individuals and families who are not prepared to make the transition to permanent housing and independent living;
5. Permanent housing, or permanent supportive housing to help meet the long term needs of homeless individuals and families;
6. Reducing chronic homeless in Orange County and addressing the needs of homeless families and individuals using motels to meet their housing needs.

Addressing the emergency and transitional housing needs of homeless persons

The City of Garden Grove uses ESG funds to support a variety of services and programs for the homeless (sheltered and unsheltered), consistent with the goals of the Orange County CoC. This

includes funding for the Homeless Emergency Assistance Rental Transition (HEART) Program which is currently administered by two non-profit service providers, Interval House and Mercy House. Most of these services and programs supported by the City include an outreach component.

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 City actively participates in the Orange County CoC by attending meetings to discuss how to establish performance measures that benefit the broader goals of the region. Consistent with the objectives of the countywide CoC, the City's Neighborhood Improvement Committee has developed several strategies to address homelessness. Some of the tasks recently undertaken by the City include: assisting with the 2019 Point in Time Count conducted by the County of Orange; development of a brochure for homeless persons that includes an inventory of local community resources; meetings with local homeless committee activists, including ALMMA (Association of Local Missions & Ministries in Action) to explore potential locations in the community for homeless to shower, store items and use as a permanent address to obtain assistance.

Also, the City addresses the emergency and transitional housing needs of homeless persons through the allocation of its ESG funds. Part of this funding is used for the Homeless Emergency Assistance Rental Transition (HEART) Program, which is part of Garden Grove's Comprehensive Four-Point approach to end homelessness. The aim of the program is to assist 20 households over a 12-month period through providing a portion of a household's rent (including security and utility deposits) while offering services to achieve self-sufficiency. Garden Grove supports several homeless services providers that provide homeless prevention, supportive services, and emergency and transitional shelters. These include:

- Women's Transitional Living Center (emergency shelter and support services for 1,280 domestic violence survivors);

- Interval House (domestic violence shelter for support services to 400 victims of domestic violence and rapid re-housing services);
- OC Partnership (provides technical support and training to homelessness service providers);
- Thomas House Temporary Shelter (food supply, shelter, and life skill resources to approximately 30 homeless families);
- Mercy House (seasonal homeless shelter and homeless prevention services).

The City mobilizes its Section 8 Housing Choice Voucher program, to the extent possible, to address the needs of homeless individuals and families. The Housing Authority gives homeless families referred by social service and emergency/transitional shelter programs preference for Section 8 vouchers to assist in the transition to stable and permanent housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

According to the 2012 Orange County Ten-Year Plan to End Homelessness, the chronically homeless are the primary targets of most outreach activities presently conducted in Orange County. The two organizations most frequently involved in these efforts are the County of Orange Health Care Agency and the Mental Health Association of Orange County. These two agencies dispatch outreach teams to cities and unincorporated areas throughout the Orange County region. The Mental Health Association of Orange County has teams of workers who also conduct outreach to the chronically homeless throughout the County. These teams are dispatched on a referral basis, as well as through the agency's outreach schedule. Frequently, the Health Care Agency and the Mental Health Association of Orange County collaborate and coordinate activities and services for individual clients.

Since 2005 (when the planning began for the Mental Health Services Act), the Orange County Health Care Agency has partnered with several private agencies to allocate resources for the mentally ill homeless individuals, including outreach activities. This work involves

comprehensive services to assist various homeless populations with mental illness, including: children, transitional age youth, adults, older adults, those dually diagnosed with co-occurring disorders, and those discharged from the Orange County jail system.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The Childhood Lead Poisoning Prevention Branch (CLPPB), as part of the state government, provides a children's environmental health program with multi-layered solutions to this complex problem. Children are considered particularly at risk of lead-based paint (LBP) hazards because of their developing immunities. According to the Center for Disease Control and Prevention, 250,000 American children aged 1 to 5 years old have blood lead levels higher than the level considered normal. High blood lead levels are a concern because they may cause harmful effects to a child's developing organ systems such as the kidneys, brain, liver, and blood-forming tissues. This may affect a child's ability to learn. Their bodies absorb up to 40% of the lead with which they come into contact as opposed to only 10% absorbed by adults. Lead enters the body through breathing or ingestion.

The California Department of Public Health (CDPH) has a childhood lead poisoning prevention branch (CLPPB) to certify construction professionals in identifying lead hazards in and around the home. The program ensures that construction activities involving lead are performed in a manner to eliminate existing lead hazards and avoid creating new lead hazards for children and other occupants, as well as the construction professionals. The primary activities include:

- Evaluating and accrediting training providers who teach lead specialists on how to find and abate lead hazards;
- Evaluating the qualifications of applicants for lead certification and granting certification to those qualified to perform lead-related construction work in an effective and lead-safe manner.

The Home Improvement Grant Program requires lead based paint inspections and lead safe work on all projects containing lead in the paint.

How are the actions listed above related to the extent of lead poisoning and hazards?

The number of lead poisoning cases in Orange County is declining. This can be attributable to public outreach and education and increased public awareness of lead-based paint hazards.

How are the actions listed above integrated into housing policies and procedures?

When HUD funds are used to assist in the rehabilitation of housing units, testing for lead-based paint is required; when lead-based paint is found, the abatement efforts are included in the scope of the rehabilitation assistance.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Poverty is defined by the U.S. Social Security Administration as the minimum income an individual must have to survive at a particular point in time. Although there are many causes of poverty, some of the more pronounced causes of poverty include:

- Low income-earning capability;
- Low educational attainments and job skills;
- Discrimination;
- Personal limitations (e.g., developmental and physical disabilities, mental illness, drug/alcohol dependency, etc.).

Based on the 2017 ACS estimates, 15.8% of Garden Grove residents live in poverty. Out of this number, 29.6% are unemployed. The City has several projects being planned, such as the Brookhurst Triangle Development, which includes residential rentals, for-sale condominiums, and affordable housing units. Garden Grove continues to look for ways to expand economic activities to include all people and provide programs to those people who are less fortunate. Other essential elements of the City's anti-poverty strategy include:

- Section 8 Housing Choice Voucher Program;
- Housing Choice Voucher Family Self Sufficiency Program;
- Economic development programs;
- Workforce Investment Board outreach and training programs;
- Anti-Crime programs;
- Housing Rehabilitation programs;
- Creation of Affordable Housing;
- Homeless service programs.

Through these programs, the City is working to reduce the number of families living below the poverty line. The goals and strategies outlined in this Consolidated Plan are related to funding housing production, community development, and community services activities. These goals

and strategies often directly address poverty issues through the provision of funding or services or indirectly through the creation of jobs.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The City will allocate up to 15% of its CDBG funds annually to public service agencies that offer supportive services to reduce poverty. Many of these agencies also assist with securing affordable housing.

SP-80 Monitoring – 91.230

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

HUD uses information from the Integrated Disbursement & Information System (IDIS) to report to Congress and to monitor grantees for Community Planning and Development (CPD) activities underway across the nation. Through staff training, particularly the Community and Economic Development and Finance Departments are experience working on HUD program financial administration and IDIS. The City continues to ensure that personnel are well equipped to improve the timeliness of HUD fund drawdowns, establish better procedures and schedules for aligning the City's general budget planning and the HUD Action Plan process. This will also ensure proper handling of the City's general ledger, remaining funds, and IDIS records.

Monitoring will include the review of funding applications, performance goals, and contracts, quarterly or semi-annual performance reports or audits, and an approval process for reimbursement requests. The purpose of the City's monitoring procedures is to evaluate the following areas consistently:

- **Performance Management:** Ensure that grantees and recipients are conducting their program following agreed-upon performance goals in the contract, utilizing funds only for eligible activities, and establishing that the clients are eligible for the applicable HUD-funded program (i.e., they meet income guidelines).
- **Financial Management:** Ensure that grantees and recipients are adhering to all appropriate federal financial management requirements. The City's contract manager will carefully review requests for reimbursement to make sure that costs are eligible, properly classified, and procured according to procedures and spending limits established by federal regulation and the contract budget. Also, the City will evaluate the contractor's annual audits to ensure compliance with the applicable federal Office of Management and Budget standards.

- **Other Administrative Management:** Ensure that work is implemented in compliance with federal environmental and labor regulations as well as policies regarding conflict of interest and prohibitions on political activity.
- **Annual Objectives and Outcomes Measures:** Pursuant to HUD requirements for the use of an outcome performance measurement system, this is used to identify the objective and outcome categories. This will be achieved, in part, through the CAPER annual reports.

Expected Resources

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

Introduction

For the 1-year period covering July 1, 2020 through June 30, 2021, the City has planned for the following allocations:

- **CDBG funds - \$2,030,219**
- **HOME funds - \$803,230**
- **ESG funds - \$174,721**

Garden Grove does not receive funding under the Housing Opportunities for Persons with AIDS (HOPWA) programs. The City anticipates an unsteady stream of program income over the course of this Action Plan. Program income received from the repayment of loans will be re-programmed for similar loan activities in the same or similar programs from which the funds were originally provided.

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	\$2,030,219	\$0	\$2,037,000	\$4,067,219	\$7,938,156	The amount of CDBG funds available during the planning period is based on actual funds available. Approximately, \$2,037,000 in unexpended prior year resources will be carried over.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab	\$803,230	\$50,000	\$2,200,000	\$3,053,230	\$3,140,629	The amount of HOME funds available during the planning

		<p>Multifamily rental new construction</p> <p>Multifamily rental rehab</p> <p>New construction for ownership</p> <p>TBRA</p>						<p>period is based on actual funds available. Approximately, \$2,200,000 in unexpended prior year resources will be carried over.</p>
ESG	public - federal	<p>Conversion and rehab for transitional housing</p> <p>Financial Assistance</p> <p>Overnight shelter</p> <p>Rapid re-housing (rental assistance)</p> <p>Rental Assistance Services</p> <p>Transitional housing</p>	\$174,721	\$0	\$5,442	\$180,163	\$683,159	<p>The amount of ESG funds available during the planning period is based on actual funds available. Approximately, \$5,442.77 in unexpended prior year resources will be carried over.</p>

Table 59 - 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

As is the case for many communities across the nation, the housing and community development needs in Garden Grove surpass the funding available to meet those needs. Therefore, effective and efficient use of funds is crucial, and the leveraging of multiple funding sources is often necessary to achieve housing and community development objectives. Most activities to be pursued by the City with CDBG, HOME, and ESG funds will be leveraged with a variety of funding sources, including grants from state, federal, and local governments, private foundations, capital development funds, general funds, private donations of funds or services, and various other funding sources. For new construction, substantial rehabilitation, and acquisition of affordable housing, the City encourages the use of Low Income Housing Tax Credits. Federal match requirements apply to the City's HOME and ESG funds.

The HOME program requires that for every HOME dollar spent, the City must provide a 25% match with non-federal dollars. HUD allows the City to use various resources to meet this match requirement. According to HOME program guidelines, no more than 25% of the City's match liability for any one year can be met through loans to housing projects, but amounts in excess of that maybe banked as match credit for future years. The City has an excess of match funds from previous years. The ESG program requires a 100% match with non-federal dollars. Garden Grove will continue to require its ESG partners to leverage non-federal funds and report their successes with each quarterly performance report.

The Garden Grove Housing Authority provides rental subsidies for eligible low-income (50% MFI) families. The Section 8 Rental Assistance Program is funded by federal grants through the Department of Housing and Urban Development. The Housing Authority provides assistance to over 2,200 low-income families. Congress determines the funding level for this program annually. Currently funding is approximately \$35.5 Million per year. The Garden Grove Housing Authority also administers a Family Self-Sufficiency Program, which assists housing participants in achieving economic self-sufficiency through education, training, and employment. Approximately 44 very low-income families are involved in the program, and currently funded

at approximately \$69,380 annually.

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

The Housing Authority owns numerous apartment complexes located throughout Garden Grove. The properties the Housing Authority owns currently have affordability covenants secured against the property and are offering the units to very-low income families at an affordable rent. The following properties are owned by the Housing Authority: 12912 7th Street, 11361 Garden Grove Blvd., 13931 9th Street, 12892 & 12942 Grove Street, 10936 Acacia Pkwy., 12291 Thackery Drive, 12882 Brookhurst Way, 12661 Sunswept Avenue, and 12602 Keel Avenue. During FY 2020-21, the City will continue to monitor these projects for compliance with rent/income limits to ensure Garden Grove residents have access to quality affordable housing.

Discussion

Refer to discussion above

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Decent and affordable housing	2020	2025	Affordable Housing Homeless Non-Homeless Special Needs	Citywide	Increase, Improve, and Preserve Affordable Housing Promote New Construction of Affordable Housing Provide Rental Assistance to Alleviate Cost Burden	CDBG: \$158,143 HOME: \$722,907	Homeowner Housing Rehabilitation: 40 Households/Housing Units Rental Units Constructed: 0 Housing Units Rental Units Rehabilitated: 9 Housing Units
2	Address the Needs of Homeless Individuals and Those At Risk of Homelessness	2020	2025	Homeless	Citywide	Promote Programs to Meet Homeless Needs	ESG: \$161,616	Homeless Persons Served: 300 Persons Assisted Tenant Based Rental Assistance (HEART & VSV): 34 Households Assisted
3	Provide Community and Supportive Services	2020	2025	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Preserve and Improve Existing Supportive Services	CDBG: \$304,532	Public Service Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted Special Resource Team: 200 Referrals 40 Street Exits

4	Address Public Facilities and Infrastructure Needs	2020	2025	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Address Public Facilities/Infrastructure Needs	CDBG: \$1,061,500	Low/Moderate Income Individuals Assisted: 2000 Individuals
5	Promote Economic Development and Employment Opportunities	2020	2025	Non-Housing Community Development	Citywide	Promote Economic Development and Employment	CDBG: \$100,000	Small Business Assistance Program: 16 Jobs Created or Retained
6	Provide for Planning and Administration Activities	2020	2025	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide	Provide for Necessary Planning and Administration	CDBG: \$406,043 HOME: \$80,323 ESG: \$13,104	Not applicable.

Goals Summary Information

Table 60 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Decent and Affordable Housing
	Goal Description	The City is focused on providing decent and affordable housing through a variety of programs as funding permits. Programs and activities to accomplish the City's goal include: new construction of affordable housing; acquisition and/or rehabilitation activities; rehabilitation assistance programs; lead-based paint hazard reduction efforts; and home ownership assistance.
2	Goal Name	Address the Needs of Homeless Individuals and Those At Risk of Homelessness
	Goal Description	The City of Garden Grove will continue to use its funds to address homeless needs in the City in a manner that supports the countywide CoC system.
3	Goal Name	Provide Community and Supportive Services
	Goal Description	The City will provide for a variety of community and supportive services, with a focus on crime awareness and prevention programs and senior services. Other services may be considered if funding is available.
4	Goal Name	Address Public Facilities and Infrastructure Needs
	Goal Description	The City will coordinate improvements to public facilities and infrastructure to improve living conditions for low-income residents and neighborhoods.
5	Goal Name	Promote Economic Development and Employment Opportunities
	Goal Description	The City will promote greater employment opportunities and support of economic development activities throughout the city.
6	Goal Name	Provide for Planning and Administration Activities
	Goal Description	<p>The City will continue to administer the CDBG, HOME, and ESG programs in compliance with program regulations and requirements. To ensure the effective use of limited CDBG, HOME, and ESG funds, the City must allocate funding towards planning and monitoring of the programs.</p> <p>The City complies with state and federal fair housing laws. To achieve fair housing goals, the City has contracted with a fair housing service provider to provide information, mediation, and referrals to residents. Garden Grove will strive to provide and maintain equal housing opportunities for all residents in City, including special needs residents.</p>

Projects

AP-35 Projects – 91.220(d)

Introduction

The Fiscal Year (FY) 2020-21 Action Plan implements the first year of the 2020–2025 Consolidated Plan and addresses HUD consolidated planning requirements for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs for the City of Garden Grove. This plan outlines the action steps that Garden Grove will use to address housing and community development needs in the City. The plan also includes a listing of activities that the City will undertake during FY 2020-21 (July 1, 2020 through June 30, 2021) that utilize CDBG, HOME and ESG funds.

The City makes its funding allocation decisions in part based on proposals received as part of the annual RFP process. Through this process, funds are awarded to eligible activities that support the goals and address the priority needs described in the Strategic Plan. While CDBG, HOME, and ESG funding allocations for FY 2020-21 will not address all of the community's priority needs, allocations are focused toward specific projects addressing high community priorities and producing tangible community benefits.

Projects

#	Project Name
1	Program Administration
2	Special Resource Team (SRT)/GGPD
3	Senior Center/Community Services Department
4	Community SeniorServ
5	Senior Center Rehabilitation
6	Maureen Drive Rehab
7	Home Improvement Grant
8	SBA Program
9	New Construction of Affordable Housing
10	Acquisition/ Rehabilitation of Affordable Housing
11	ESG20 Garden Grove

Table 61 – Project Information

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

The major obstacle to addressing the underserved needs in the community is the lack of adequate funding, especially for affordable housing activities. With the dissolution of redevelopment in California and reduced State and Federal funding levels, the City's ability to address the extensive needs in the community is seriously compromised.

AP-38 Project Summary

Project Summary Information

Prior Year Funds Description

Tenant Based Rental Assistance – During FY 19-20, the City began administering the Homeless Emergency Assistance Rental Transition (HEART) Program, which provides rental assistance with wrap-around services to literally homeless households. Due to its success, the City anticipates extending the program through FY 20-21 with \$500,000 in prior year funds, unexpended HOME funds. Additionally, during FY 20-21, the City anticipates offering rental assistance to 17 senior citizens at-risk of becoming homeless due to the expiring affordability covenants of the Valley View Senior Villas affordable housing project. Rental assistance for this vulnerable population will be subsidized with \$140,000 in prior year, unexpended HOME funds.

Emergency Solutions Grant – During FY 2018-19, there was \$5,442.77 of unexpended Emergency Solutions Grant funds. In order to spend these unexpended funds, Mercy house will be allocated the \$5,442.77 of funds for Homeless Prevention services for Garden Grove homeless individuals and families.

Beach/Trask Sewer Project - During FY 2019-20, the City of Garden Grove began work on the Beach/Trask Sewer Project (Project) to fulfill the \$1,542,000 repayment obligation created by canceling HUD Activity #318. Initial projections estimated the Project cost to be at \$1.6M, however, the Project was bid lower than anticipated (\$1.1M), which will leave a portion of the repayment obligation unpaid. During FY 20-21, the City anticipates undertaking an infrastructure project (Maureen Drive Rehab) and one public facility project (Senior Center Rehab) that will be used to fulfill the remainder of the repayment obligation to HUD.

Project Summary Information	Project Name	Program Administration
	Target Area	
	Goals Supported	Provide for Planning and Administration Activities
	Needs Addressed	Provide for Necessary Planning and Administration Activities
	Funding	CDBG: \$406,043 HOME: \$80,323
	Description	Provide for necessary planning and administration activities to address housing and community development needs in the City.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	11222 Acacia Parkway, Garden Grove, CA 92840
	Planned Activities	Planning and public participation, contract design, management and monitoring, financial administration, and HUD communication to administer the City's CDBG, HOME, and ESG programs. Garden Grove will strive to provide and maintain equal housing opportunities for all residents in City, including special needs residents.
2	Project Name	Special Resource Team (SRT)/GGPD
	Target Area	
	Goals Supported	Provide Community and Supportive Services
	Needs Addressed	Preserve and Improve Existing Supportive Services
	Funding	CDBG: \$121,695
	Description	The Police Department's Special Resource Team is responsible for providing response and outreach to homeless individuals. The main goal for the Special Resource Team is to get the homeless residents the services they need to get off of the streets. Funding this organization will enhance safety in lower-income areas.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	Provide 200 referrals to homeless service providers which results in 40 Street Exits.
	Location Description	Citywide
	Planned Activities	Homeless Street Outreach
3	Project Name	CDBG Senior Center
	Target Area	
	Goals Supported	Provide Community and Supportive Services
	Needs Addressed	Preserve and Improve Existing Supportive Services
	Funding	CDBG: \$162,837
	Description	Provide one or more programs for seniors at the H. Louis Lake Senior Center. Programs include recreation and socialization, daily lunch, nutrition health education, and support for seniors.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	300 Individuals
	Location Description	11300 Stanford Avenue, Garden Grove, CA 92840.
Planned Activities	Recreation and socialization programs, daily lunch, nutrition health education classes, and support services for seniors.	
4	Project Name	CDBG Community SeniorServ
	Target Area	
	Goals Supported	Provide Community and Supportive Services
	Needs Addressed	Preserve and Improve Existing Supportive Services
	Funding	CDBG: \$20,000
	Description	Provide raw food for congregate meals to Garden Grove residents citywide.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	230 Individuals
	Location Description	Citywide
	Planned Activities	Provide raw food for congregate meals.
5	Project Name	Senior Center Rehabilitation
	Target Area	
	Goals Supported	Address Public Facilities and Infrastructure Needs
	Needs Addressed	Address Public Facilities/Infrastructure Needs
	Funding	CDBG: \$328,000
	Description	CDBG funds will be used to rehabilitate the H. Louis Lake Senior Center to increase ADA accessibility
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Low/Moderate Income Individuals Assisted: 1000 Individuals
	Location Description	11300 Stanford Avenue, Garden Grove, CA 92840.
	Planned Activities	Public Facility Rehabilitation
6	Project Name	Maureen Drive Rehab
	Target Area	
	Goals Supported	Address Public Facilities and Infrastructure Needs
	Needs Addressed	Address Public Facilities/Infrastructure Needs
	Funding	CDBG: \$733,500
	Description	CDBG funds will be used to rehabilitate local residential streets
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Low/Moderate Income Individuals Assisted: 2000 Individuals

	Location Description	Maureen Drive
	Planned Activities	Infrastructure rehabilitation
7	Project Name	CDBG Home Improvement Grant
	Target Area	
	Goals Supported	Provide Decent and Affordable Housing
	Needs Addressed	Increase, Improve, and Preserve Affordable Housing
	Funding	CDBG: \$158,143
	Description	The program provides on a citywide basis a grant of up to \$5,000 for exterior minor home repairs, energy conservation activities, accessibility improvements, security and safety improvements, exterior refurbishing, and painting to eligible lower-income homeowners.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitation: 40 Households/Housing Units
	Location Description	Citywide
	Planned Activities	Home improvement grants for exterior minor home repairs, energy conservation activities, accessibility improvements, security and safety improvements, exterior refurbishing, and painting.
8	Project Name	SBA Program
	Target Area	
	Goals Supported	Promote Economic Development and Employment Opportunities
	Needs Addressed	Promote Economic Development and Employment
	Funding	CDBG: \$100,000
	Description	Provide Small Business Assistance loans to promote job creation and retention
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	Small Business Assistance Program: 16 Jobs Created or Retained
	Location Description	Citywide
	Planned Activities	Provide small business assistance loans.
9	Project Name	New Construction of Affordable Housing
	Target Area	
	Goals Supported	Provide Decent and Affordable Housing
	Needs Addressed	Promote New Construction of Affordable Housing
	Funding	HOME: \$361,453
	Description	Facilitate predevelopment of new housing projects
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	0 new affordable housing units
	Location Description	Citywide
Planned Activities	Use HOME funds to support new projects that include affordable housing through target policies and procedures to facilitate such developments.	
10	Project Name	Acquisition/ Rehabilitation of Affordable Housing
	Target Area	
	Goals Supported	Provide Decent and Affordable Housing
	Needs Addressed	Increase, Improve, and Preserve Affordable Housing
	Funding	HOME: \$361,454
	Description	Dedication of affordable rental housing units in exchange for financial assistance for developers to acquire and/or rehabilitate properties.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	9 rental units.
	Location Description	Citywide
	Planned Activities	The City will use HOME funds to assist a developer acquire, rehabilitate, and manage rental units at affordable rents.
11	Project Name	ESG 20 Garden Grove
	Target Area	
	Goals Supported	Address the Needs of Homeless Individuals and Those At Risk of Homelessness
	Needs Addressed	Promote Programs to Meet Homeless Needs
	Funding	ESG: \$174,721
	Description	Provide shelter and supportive services for homeless families.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Assist approximately 300 homeless Garden Grove residents.
	Location Description	Citywide
Planned Activities	Provide Street Outreach, Emergency Shelter Essential Services, Emergency Shelter Operations, Homeless Prevention, Rapid-Rehousing, and Homeless Management and Information Systems.	

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 City has not established specific target areas to focus the investment of CDBG funds. MA-50 of the Consolidated Plan contains a map of block groups illustrating the lower-income areas in the City (defined as a block group where at least 51% of the population have incomes not exceeding 80% of the AMI). Investments in housing and community development services serving special needs populations and primarily lower-income persons will be made throughout the City. Housing assistance will be available to income-qualified households citywide.

Geographic Distribution

Target Area	Percentage of Funds

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The majority of the city of Garden Grove qualifies as a low- and moderate-income area. Therefore, given the extensive needs in the community, the City has not targeted any specific neighborhood for investment of CDBG and HOME funds. Instead, projects are evaluated on a case-by-case basis, while considering emergency needs, cost effectiveness, feasibility, and availability of other funding to address the specific needs.

Discussion

Refer to discussion above

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City plans to utilize HOME and CDBG funds to support its authorized housing activities, including the Home Improvement Grant Program, as well as the acquisition/rehabilitation of affordable housing units.

One Year Goals for the Number of Households to be Supported	
Homeless	46
Non-Homeless	30
Special-Needs	10
Total	86

Table 64 - One-Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	37
The Production of New Units	0
Rehab of Existing Units	49
Acquisition of Existing Units	0
Total	86

Table 65 - One-Year Goals for Affordable Housing by Support Type

Discussion

Refer to responses above.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Garden Grove Housing Authority receives Federal funds to facilitate the housing needs of persons from low-income households. The City does not operate or own public housing units. However, it disseminates rental assistance through the Section 8 vouchers. The City is currently serving approximately 2,200 households through the rental assistance program.

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

Not Applicable. The City of Garden Grove does not operate any public housing units.

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

Not Applicable. The City of Garden Grove does not operate any public housing units.

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

Not Applicable. The City of Garden Grove does not operate any public housing units.

Discussion

Refer to responses above.

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

Introduction

Homeless prevention services are identified as a high priority need in the 2020-2025 Consolidated Plan. The City plans to address the needs of homeless individuals and those at risk of homelessness through allocation of ESG funds to support local efforts to prevent and address homelessness. The City of Garden Grove also administers the Homeless Emergency Assistance Rental Transition (HEART) Program, which forms part of the Comprehensive Four-Point Approach to End Homelessness. Through HEART, a portion of a household's rent (including security and utility deposits) is paid while offering services to achieve self-sufficiency. The program aims to assist 20 households over a 12-month period. The City will also continue to participate in the Orange County Continuum of Care System for the Homeless.

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

Garden Grove participates in the Orange County Continuum of Care (CoC) system. For the past several years, leadership and coordination of Orange County's Continuum of Care planning process have been the shared responsibility of OC Partnership, 211 Orange County, and the OC Community Services. This public/nonprofit partnership helps ensure comprehensive and regional coordination of efforts and resources to reduce the number of homeless individuals and persons at risk of homelessness throughout Orange County. This group serves as the regional convener of the year-round CoC planning process and works as a catalyst for the involvement of the public and private agencies that make up the regional homeless system of care. The Orange County Continuum of Care system consists of 6 basic components:

1. Advocacy on behalf of those who are homeless or at-risk of becoming homeless;
2. A system of outreach, assessment, and prevention for determining the needs and conditions of an individual or family who is homeless;

3. Emergency shelters with appropriate supportive services to help ensure that homeless individuals and families receive adequate shelter and referrals;
4. Transitional housing to assist homeless individuals and families who are not prepared to make the transition to permanent housing and independent living;
5. Permanent housing or permanent supportive housing to help meet the long term needs of homeless individuals and families;
6. Reducing chronic homelessness in Orange County and addressing the needs of homeless families and individuals using motels to meet their housing needs.

During FY 2020-21, the City plans to fund street outreach services to reach out to unsheltered homeless people; connect them with emergency shelter, housing or critical services; and provide urgent non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing or an appropriate health facility.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City actively participates in the Orange County CoC by attending meetings to discuss how to establish performance measures that benefit the broader goals of the region. Consistent with the objectives of the countywide CoC, the City's Neighborhood Improvement Division has developed several strategies to address homelessness. Some of the tasks recently undertaken by the City include:

1. Point in Time Survey conducted by the County of Orange and CityNet;
2. Development of a brochure for homeless persons that includes an inventory of local community resources; and
3. Collaborating with ESG entitlement jurisdictions within the County of Orange to discuss issues, concerns, and best practices for meeting the needs of the homeless population.

In addition, the City addresses the emergency and transitional housing needs of homeless persons through allocation of its ESG funds. Garden Grove will provide funding to Interval House, which provides domestic violence shelter and support services to victims of domestic

violence. In addition, City Net, the City's street outreach service provider will connect homeless individuals and families to local shelters and service providers.

The City mobilizes its Section 8 Housing Choice Voucher Program, to the extent possible, to address the needs of homeless individuals and families. The Housing Authority gives homeless families referred by social service and emergency/transitional shelter programs preference for Section 8 vouchers to assist in transitioning to stable and permanent housing.

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 City plans to fund Interval House to provide short to medium term rental assistance for up to 24 months, including up to six months of rental arrears, to homeless individuals and families. Homeless individuals and families will be located in permanent housing while they are given services to increase their income. In addition, Interval House will provide housing relocation, stabilization, case management, legal services for housing needs, and credit repair assistance. All services are designed to seamlessly transition clients into suitable and stable permanent housing.

Interval House advocates are specialized in assisting clients with housing search and placement through established operational agreements with over 40 landlords. Clients may be immediately housed in local CoC shelters or access emergency homeless assistance through social services during housing search. All ineligible applicants are offered resources through 2-1-1 Orange County.

As part of the efforts to provide housing for the homeless and those at risk of homelessness, the City of Garden Grove will give Emergency Solution Grants (ESG) to service providers who provide rental assistance through the HEART Program. At present, two non-profit service providers, Interval House and Mercy House, administer the program. The aim is to assist 20

households over a 12-month period through providing a portion of a household's rent (including security and utility deposits) while offering services to achieve self-sufficiency.

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

One of the key strategies for homeless prevention is employment development. The goal is to enhance a person's ability to obtain and keep a job, and to make an adequate income to be self-sufficient. To that end, the Garden Grove Housing Authority operates a Family Self Sufficiency Program (FSS) within its jurisdiction. FSS is a HUD program that provides the following support services: educational and/or job assessment, enrollment in an educational or job training program, childcare provisions, transportation, case management, budget counseling, and First Time Home Buyer counseling. Workforce Training initiatives available in Garden Grove include:

- The Orange County One-Stop Centers provide comprehensive employment and training services, including a Resource Center with access to computers, fax machines, copiers, and telephones. Other services include a resume distribution program, veteran transition services, a career resource library, labor market information, networking opportunities, job search workshops, on-site interviews with local employers, transferable skills information, job leads, and training programs. There are programs for youth, older workers, people with disabilities, adults, and veterans.
- The Garden Grove Chamber of Commerce is a non-profit, non-governmental, voluntary membership organization comprised of local businesses and leaders interested in enhancing the Garden Grove community. The Chamber of Commerce serves as the link between businesses, local government, neighborhood associations, and the general public. Chamber members can mutually aid each other in promoting and producing business and aid the community by providing important services and tax revenues.

The City works diligently to expand and conserve the affordable housing inventory, especially affordable rental housing that benefits the extremely low-and very low-income households who are most at risk of becoming homeless. Lower-income households referred to the Housing Authority by local transitional housing and emergency shelters are given priority for the Section 8 program. The City will allocate ESG funds to Mercy House to provide homeless prevention services in the form of short to medium term rental assistance for up to 24 months, including up to 6 months of arrears, to individuals and families at imminent risk of homelessness. The housing assistance provided will be located in permanent housing. In addition, funds for homeless prevention will also provide financial assistance such as rental application fees, security deposits and/or services such as case management, housing search and placement, and legal services.

During fiscal year 2020-21, the City of Garden Grove will provide Tenant Based Rental Assistance to 17 seniors at-risk of becoming homeless due to the expiration of affordability covenants at the Valley View Senior Villas affordable housing project. The rental assistance will be used to keep the residents in their housing units until permanent, affordable housing accommodations can be secured.

Mercy House will engage persons in need of homeless prevention through referrals from 2-1-1 Orange County and will participate in the Orange County Homeless Provider Forum. To ensure that the most vulnerable are served, eligible households will be those at imminent risk of homelessness, who fall at or below 30% AMI, and have been served a notice of eviction. Mercy House will work with households to increase income, find employment, and set a household budget that will prepare them for long-term stability and to prevent recidivism and homelessness. There will also be continued rental assistance for persons experiencing homelessness and those at risk of being homeless through the Homeless Emergency Assistance Rental Transition (HEART) Program that Mercy house is a part of. The HEART Program is part of Garden Grove's Comprehensive Four-Point Approach to End Homelessness, which provides rental assistance for persons who are homeless, and those at risk of homelessness. In addition, while receiving services, case managers from Mercy House will meet with the household

receiving assistance regularly to encourage accomplishments of goals, money savings, and debt payoffs.

Discussion

Refer to responses above.

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

Introduction:

Development Fees - The fees the City Charges to process and review plans for residential developments may increase the cost of building affordable housing in the jurisdiction. This may, in turn, affect rents, which may become fair market rents.

Development Review and Permit Processing - The review process for building permits can be a constraint to housing development if they place an undue burden on the developer. The longer housing projects take to be built or rehabilitated, the higher the development or rehabilitation cost may become. This could also affect the affordable housing stock due to conversion to market rents.

Environmental Review Process - Environmental factors such as the presence of sensitive biological resources and habitats or geological hazards can constrain residential development in a community by increasing costs and reducing the amount of land suitable for housing construction

Legislative Barriers - The AB 1482 legislation was voted into law to prevent arbitrary rental increases on lower-income households. However, due to the 85-day waiting period before the law came into effect on the 1st of January 2020, many tenants were given eviction notices so that their homes could be converted to market rents.

Other non-governmental constraints include:

Financing - Economic conditions and national policies determine interest rates for borrowing money for residential developments as well as mortgage rates. This affects the ability to purchase or rehabilitate housing due to increased costs.

Infrastructure Constraints - Public facilities, particularly drainage and sewage, need to be updated and expanded constantly to accommodate the growing number of housing units. Deficiency in sewer capacity, as well as land designations for this essential infrastructure, reduces land that is available for housing development.

Environmental Constraints - the city of Garden Grove is located in a region with a seismic activity that may deter the development of housing within certain areas. However, it is not located within an Alquist-Priolo Special Study Zone that would affect housing production. The Alquist-Priolo Earthquake Fault Zoning Act of 1972 prevents the construction of buildings used for human occupancy on the surface trace of active faults. The act prohibits new construction of houses in California within these zones unless a comprehensive geologic investigation shows that the fault does not pose a hazard to the proposed structure.

The city of Garden Grove is within a flood zone, according to The Federal Emergency Management Agency (FEMA) maps. According to FEMA, the term "100-year flood" refers to the flood elevation level that has a 1% chance of being equaled or exceeded each year. There is a need for additional investment in flood prevention when developing residential units.

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

Market and governmental factors pose barriers to the provision of adequate and affordable housing. These factors tend to disproportionately impact lower- and moderate-income households due to their limited resources for absorbing the costs. Garden Grove works to remove barriers to affordable housing by implementing a Housing Element that is consistent with California law and taking actions to reduce costs or provide offsetting financial incentives to assist in the production of safe, high-quality, affordable housing. The City is committed to removing governmental constraints that hinder the production of housing and offers a "one-stop" streamlined permitting process to facilitate efficient entitlement and building permit processing.

The City of Garden Grove has instituted additional actions aimed at reducing the impact of the public sector role in housing costs. City efforts to remove barriers to affordable housing include:

- Periodical analysis and revision of the zoning code aimed at developing flexible zoning provisions in support of providing an adequate supply of desirable housing, such as mixed-use zoning standards and updates to the Housing Element;
- Provision of affordable housing projects through acquisition and rehabilitation activities, and new construction of affordable housing units;
- Establishing a streamlined service counter to reduce the processing time;
- Density bonuses for affordable projects;
- Continued assessment of existing policies, procedures, and fees to minimize unnecessary delays and expenses to housing projects.

Also, the City will use its Analysis of Impediments to Fair Housing Choice (AI) report in coordination with other local jurisdictions. The AI has identified any potential impediments to fair housing and has established a Fair Housing Action Plan to outline steps to overcome any identified impediments.

Discussion:

Refer to responses above.

AP-85 Other Actions – 91.220(k)

Introduction:

This section discusses the City's efforts in addressing underserved needs, expanding and preserving affordable housing, reducing lead-based paint hazards, and developing institutional structure for delivering housing and community development activities.

Actions planned to address obstacles to meeting underserved needs

The major obstacle to addressing underserved needs is the lack of adequate funding, especially for affordable housing activities. With reduced State and Federal funding levels, the City's ability to address the extensive needs in the community is seriously compromised. The City will strive to leverage available funds, to the greatest extent possible; to overcome obstacles in meeting underserved needs. The City continues to use its 2014-2021 Housing Element, which includes a commitment to pursue State, Federal, and other funding opportunities to increase the supply of safe, decent, affordable housing in Garden Grove for lower-income households (including extremely low-income households), which includes: seniors citizens, disabled, homeless, and those at risk of homelessness.

Actions planned to foster and maintain affordable housing

Garden Grove has several programs in place to increase and preserve the supply of affordable housing for lower-income households. One of these programs produces affordable housing through the acquisition and rehabilitation of existing housing units, as well as the construction of new units. In the past, the City has partnered with nonprofit organizations and housing developers to accomplish this goal. Increased sustainability of existing single-family housing is accomplished through the provision of grants to low-income residents and senior citizens to make necessary repairs to their homes.

Actions planned to reduce lead-based paint hazards

The City has an aggressive policy to identify and address lead-based paint hazards in HUD-funded housing rehabilitation projects. A licensed professional for detecting the presence of lead-based paint first inspects all housing units rehabilitated with Federal funds. The City

ensures lead-safe work practices are used to perform all rehabilitation where lead-based paint is identified. All homes identified as containing lead paint are tested post-rehabilitation to ensure the hazard has been mitigated.

Actions planned to reduce the number of poverty-level families

Garden Grove continues to look for ways to expand economic activities to include all people, including those at or below the poverty line. In the past, the City has focused on the creation of jobs for low-and moderate-income persons through economic development in the Harbor Boulevard area. In recent years, the Small Business Assistance Loan Program was introduced as a job creation activity that offers financial assistance to for-profit businesses in exchange for them to hire at least one new, low-income, full-time employee.

In addition, other essential elements of the City's anti-poverty strategy include:

- Section 8 Housing Choice Voucher Program;
- Housing Choice Voucher Family Self Sufficiency Program;
- Economic development programs;
- Workforce Investment Board outreach and training programs;
- Anti-crime programs;
- Housing rehabilitation programs;
- Creation of affordable housing;
- Homeless service programs.

Through these programs, the City is working to reduce the number of families living below the poverty line. The goals and strategies contained in this Consolidated Plan aim to fund housing, community development, and community services. In addition, the City will allocate up to 15% of its CDBG funds annually to public service agencies that offer supportive services in an effort to reduce poverty.

Actions planned to develop institutional structure

Successful program implementation requires coordination, both internally and with outside agencies. The City makes changes, as needed, to its staff assignments to address the administrative, planning, and reporting needs of CDBG, HOME, and ESG funds. Project management improvements have included strengthened project eligibility review and staff training of regulatory compliance and procedures. The City of Garden Grove Neighborhood Improvement Division of the Community and Economic Development Department serves as the lead agency in the administration and compliance of CDBG, HOME, and ESG programs and grant management. The Neighborhood Improvement Division coordinates activities related to CDBG, HOME, and ESG funds, including coordination of internal departments, outside agencies, and grant recipients.

The City's ongoing efforts in its institutional structure include strengthening project designs through negotiating stronger and more specific performance goals for project contracts. This includes ongoing education and technical assistance for program stakeholders including fellow City Departments implementing HUD-funded programs, outside contractors, Neighborhood Improvement and Conservation Commission, City Council, and the public. The City also amended the Citizen Participation Plan to make it more readable and to officially designate the City Council as the public hearing body. Capacity building is another development component within the City's institutional structure. In addition to in-house training and development of improved management systems, the City will continue to participate in all HUD training offered locally. To gather more information, build staff knowledge, and seek regional solutions to regional problems, the City participates in regional efforts such as the Orange County Continuum of Care for the Homeless

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

Housing, supportive services, and community development activities are delivered by a number of public agencies, nonprofit entities, and private organizations. The City of Garden Grove will continue to function in a coordinating role between local non-profit service providers and

other County, State, and Federal organizations. To enhance coordination, the City participates in regional planning groups and forums to foster collaboration with other agencies and organizations.

Through collaboration, the City identifies common goals and strategies to avoid overlaps in services and programs and identify potential for leveraging resources. The City also continues to work with a wide range of public and community social service agencies to address the various needs of the community. The City also utilizes the services of 211 Orange County, whose mission is to help people in the community find the help they need by eliminating the barriers to finding and accessing social services

Discussion:

Refer to responses above.

Program Specific Requirements

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

Introduction:

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.

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
6. Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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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:

The City of Garden Grove does not anticipate using forms of investment beyond what is listed in Section 92.205.

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 City of Garden grove does not anticipate using HOME funds for home-buyer activities during FY 20-21.

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:

The City of Garden grove does not anticipate using HOME funds for home-buyer activities during FY 20-21.

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:

The City of Garden grove does not anticipate using HOME funds to refinance existing debt.

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

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

Please see City of Garden Grove Protocols for Administering The Emergency Solutions Grant, included as Appendix B.

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

The City of Garden Grove participates in the Orange County Continuum of Care system (CoC). The Orange County CoC has established the Orange County Homeless Management Information System (HMIS), an online database used by homeless and at-risk service providers that records demographic and service usage data and produces an unduplicated count of the people using those services.

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 City, along with the cities of Anaheim, Irvine, Santa Ana and the County of Orange, has developed the Orange County ESG collaborative. During the 5-year Consolidated Plan cycle, the collaborative conducts an open and competitive Request for Proposal process for making sub-awards.

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.

The City consults with the Continuum of Care, which has former homeless individuals as members. Subrecipients who run the shelters and the rapid re-housing programs in the community have former homeless individuals in their organizations who help shape policies and make decisions about services and programs that receive ESG funding.

5. Describe performance standards for evaluating ESG.

The performance standards for evaluating ESG are described in the Protocols for Administration of The Emergency Solutions Grant, included in Appendix B.

Appendix A:
Alternate/Local Data Sources

Appendix - Alternate/Local Data Sources

1	Data Source Name 2013-2017 ACS 5-Year Estimates
	List the name of the organization or individual who originated the data set. U.S. Census Bureau
	Provide a brief summary of the data set. The American Community Survey (ACS) is a mandatory, ongoing statistical survey that samples a small percentage of the population every year.
	What was the purpose for developing this data set? The American Community Survey (ACS) gives communities the current information they need to plan investments and services.
	Provide the year (and optionally month, or month and day) for when the data was collected. The American Community Survey collects data on an ongoing basis, January through December, to provide every community with the information they need to make important decisions. New data is released every year, in the form of estimates, in a variety of tables, tools, and analytical reports.
	Briefly describe the methodology for the data collection. See http://www.census.gov/acs/www/methodology/methodology_main/
	Describe the total population from which the sample was taken. See http://www.census.gov/acs/www/methodology/sample_size_and_data_quality/
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. See http://www.census.gov/acs/www/
	2
List the name of the organization or individual who originated the data set. County of Orange, OC Community Services OC Partnership Focus Strategies	
Provide a brief summary of the data set. Once every two years, Orange County undertakes an effort to enumerate all of the sheltered and unsheltered homeless people within the county in a given 24-hour period. This effort, known as the	

Homeless Point In Time Count, is congressionally mandated for all communities that receive U.S. Department of Housing and Urban Development (HUD) funding for homeless programs. HUD's requirement includes a count of both sheltered and unsheltered homeless people, as well as the incidence of certain subpopulation characteristics among the homeless population. HUD requires that the Count be conducted during the last ten days in January.

The sheltered portion of the count is extracted from data in the County's Homeless Management Information System (HMIS), operated by 211 Orange County, and includes all persons who occupied a shelter or transitional housing bed on the night of the count. The unsheltered portion of the count is based on a morning count and survey.

What was the purpose for developing this data set?

The results of the count and survey allow for a better understanding of who is experiencing homelessness in Orange County. At its core, the count provides data as required by HUD to enumerate and describe the homeless population in the community.

Provide the year (and optionally month, or month and day) for when the data was collected.

Tuesday, January 22, 2019

Briefly describe the methodology for the data collection.

The 2019 Orange County Point in Time (PIT) count uses a public places count with sampling methodology, which is one of only two methodologies appropriate for a jurisdiction of the size and urbanization of Orange County. The public places with sampling methodology counts visibly homeless people in public places and then applies a statistical formula to account for the geography not visited on the morning of the count. This count integrated an interview with counted people to extrapolate characteristics of the unsheltered population.

Concurrent with the count, surveys were administered to counted persons (adults only) who were awake, willing, and able to participate. The survey collected additional information on where the respondent was living, demographics for the respondent and his/her family, disabilities, and the length of time that the person has been homeless.

Describe the total population from which the sample was taken.

Homeless individuals who are sheltered and unsheltered are represented in the Point in Time Count. Sheltered persons are those staying in an emergency shelter, transitional housing site or Safe Haven site (a specific type of program; Orange County has no designated Safe Haven programs.) the night before the unsheltered count. Data for those sheltered persons comes from the Homeless Management Information System (HMIS) or from surveys provided by shelters and transitional housing programs not participating in HMIS.

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

The 2019 PIT provides demographic data on age, gender, race and ethnicity of homeless population and subpopulations. During the PIT, 6,860 homeless persons were surveyed.

4	Data Source Name
	2019 Point in Time Summary Homeless Populations
	List the name of the organization or individual who originated the data set.
	Orange County Homeless Management Information System
	Provide a brief summary of the data set.
	HMIS is an online database used by homeless and at-risk service providers that records demographic and service usage data and produces an unduplicated count of the people using those services.
	What was the purpose for developing this data set?
	The count is conducted to understand homelessness in the community in order to end it. This “Point-in-Time” count provides vital information that guides and shapes the way we approach and solve homelessness in Orange County.
Provide the year (and optionally month, or month and day) for when the data was collected.	
Tuesday, January 22, 2019	
Briefly describe the methodology for the data collection.	
The Point in Time (PIT) count is a biannual tally of people without a home on a particular night.	
Describe the total population from which the sample was taken.	
This is a Sheltered-Only county.	
Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.	
Demographic information of homeless populations.	

Appendix B:
Summary of Public Outreach

Service Provider Mailing List

Fair Housing Foundation
Barbara Shull, Executive Director
800-446-3247 ext. 1100
bshull@fairhousingfoundation.com
3605 Long Beach Blvd., Ste 302
Long Beach, CA 90807

David Dent
Building Services Manager
Garden Grove Community Development Department

Thinh Tran
Vietnamese Comm. of Orange County
14541 Brookhurst #C9-10
Westminster, CA 92683

Mallory Vega
mallory.vega@alzoc.org
Acacia Adult Day Services
11391 Acacia Parkway
Garden Grove, CA 92840

Mary Luna
International Crusade of the Penny
12501 Jane Drive
Garden Grove, CA 92841

Tien Chu
12422 Lee Ln.
Garden Grove, CA 92840

Debra Stroman
Breast Cancer Angels
6 Cape Woodbury
Newport Beach, CA 92660

Kimberly Shettler
Director of Supporting Programs
Illumination Foundation
2691 Richter Ave., Suite 107
Irvine, Ca 92606

Kris Backouris
Garden Grove Police Department

Russell Vergara
Community Health Care Centers
8041 Newman Avenue
Huntington Beach, CA 92647

Beverly Spencer
College of Optometry
2575 Yorba Linda Blvd.
Fullerton, CA 92831

Elise Esparrza
Fletcher House DBA Halfway Homes
12722 Fletcher Drive
Garden Grove, CA 92840

Elizabeth Boland
Legal Aid Society of Orange County
2101 N. Tustin Ave.
Santa Ana, CA 92705

Julia Jim, Grants Manager
Orange County Superior Court, Central
Justice Center
700 Civic Center Drive West
Santa Ana, CA 92701

Holly Hagler
Community SeniorServ
1200 N. Knollwood
Anaheim, CA 92801

Rosemarie Avila
3007 S. Diamond St.
Santa Ana, CA 92704

Tom Quintell
Salvation Renovation
12042 Blackmer
Garden Grove, CA 92845

Janet Pelayo, Manager
H. Louis Lake Senior Center
Garden Grove Community Services Department

Vicki Connely
St. Anselm Cross Cultural Comm. Center
13091 Galway St.

Garden Grove, CA 92844

Pat Digre, Contracts Administrator
Lutheran Social Services of So. Cal.
2560 N. Santiago Blvd.
Orange, CA 92867

Assistance League of Garden Grove
10932 Trask Avenue
Garden Grove, CA 92843

Linda Lomask
Veterans First
1540 E. Edinger Avenue
Santa Ana, CA 92705

Marc Mullendore
AIDS Services Foundation
17982 Sky Park Circle, Suite J
Irvine, CA 92614

Gayle Knight, CEO and Founder
H.O.P.E.
11022 Acacia Parkway, Suite C
Garden Grove, CA 92840

Catherine Peoples
HPP Cares
4120 Atlantic Ave,
Long Beach, CA 90807

The Syriac Charitable Society of America
11751 Garden Grove Blvd., Suite 209
Garden Grove, CA 92843

American Lung Association
1570 East 17th St. Suite F
Santa Ana, CA 92705

Tiffany Budzinski
Boat People SOS
9191 Bolsa Ave, #110
Westminster, CA 92683

Child Abuse Prevention Center
500 S. Main, Suite 1100
Orange, CA 92868

Shirley Kellogg
Garden Grove United Methodist Church
12741 Main St.
Garden Grove, CA 92840

Kathleen Ely
Family Support Network
181 W. Orangethorpe Ave., Suite D
Placentia, CA 92870

Jeffrey Bray
107 Pine #223
Seattle, WA 98101

Bader Alyaakoubi
8100 Park Plaza #226
Stanton, CA 90680

Frieda Cruze
Rebuilding Together O.C.
625 Cypress Ave,
Santa Ana, CA 92701

Saut Tazegul
(865) 249-4375
stqzegul@uanq.us
12642 Brookhurst Street
Garden Grove, CA 92840

Je'net Kreither
Grandma's House of Hope
174 N. Lincoln Avenue, #541
Anaheim, CA 92805

Delores Kollmer
Dayle MacIntosh Center
13272 Garden Grove Blvd.
Garden Grove, CA 92843

Carolyn Hauenstein
11101 Stratford Way
Garden Grove, CA 92840

Ms. Karen B. Williams, COO
OC Partnership

1505 E. 17th St., Suite 190
Santa Ana, CA 92705

Natalie Wolfs
Thomas House
P.O. Box 2737
Garden Grove, CA 92842

Carol Williams
Interval House
PO Box 3356
Seal Beach, CA 90740

William O'Connell
Colette's Children's Home
17301 Beach Blvd., Suite 23
Huntington Beach, CA 92647

Hospital Assoc. of Southern California
Attn: Julie Puentes
12399 Lewis St., Suite 103
Garden Grove, CA 92840

Kathy Strong
Women's Transitional Living Center
P.O. Box 6103
Orange, CA 92683

Public Law Center
601 Civic Center Drive West
Santa Ana, CA 92701-4002

Paul Leon
Illumination Foundation
2691 Richter Ave., Suite 107
Irvine, CA 92606

Darlene Powell, Director of Housing
Mental Health Assoc. of Orange County
822 Town and Country Road
Orange, CA 92868

Allison Davenport, Development Director
Mercy House
Post Office Box 1905
Santa Ana, CA 92702

211 Orange County
Attn: Erin Derycke
PO Box 14277
Irvine, CA 92632

Matt Bates
City Net
4508 Atlantic Avenue, #292
Long Beach, CA 90807

Consolidated Plan Staff Contacts

Housing Authority contact- Danny Huynh, Manager
714-741-5154
dannyh@ggcity.org

Police Department Contact for homeless information- Bryan Meers
714-741-5957
bryanm@ggcity.org <mailto:jeffn@ci.garden-grove.ca.us>

ESG questions- Timothy Throne, Program Specialist
714-741-5144
timothyt@ggcity.org <mailto:paulg@ci.garen-grove.ca.us>

City of Garden Grove Developer Contact List

Brandywine Homes (Developer)
Jim Barisic
949 296-2400 Ext. 100
16580 Aston
Irvine, CA 92606

Olson Company (Developer)
Kay Chandler, Senior Vice President, General Counsel & Secretary
562.370.2270

Ian Brown (commercial broker)
Newmark Grubb Knight Frank
949.608.2050

McWhinney (Developer)
Trae Rigby
(720) 360-4700

Kam Sang Company (Developer)
Phil Wolfgramm
626 446-2988

Matthew Reid (Developer)
Land & Design, Inc.
619.567.2447 x101 office

Joseph Lising (Broker)
Marcus & Millichap
949 419-3227

Michael J. Bouma (Broker)
Voit Real Estate Services
714-935-2340

Kimberly Prijatel
City Ventures (Developer)
(949) 258-7555

Jamboree Housing Corporation (CHDO – Non Profit Developer)
Laura Archuleta, President
17701 Cowan, Irvine, CA 92614
(949) 263-8676

Brenda Rodriguez, Executive Director
Affordable Housing Clearinghouse
23861 El Toro Rd, Suite 401
Lake Forest, CA 92630
949-525-4948
brodriguez@affordable-housing.org

Ajay Nayar, Vice President
AOF Golden State CDC
7755 Center Ave, Suite 575
Huntington Beach, CA 92647
714551-0123
ajay.nayar@aofpacific.com

Shaun Bradley
Meta Housing Corp.
11150 W Olympic Blvd, Suite 620
Los Angeles, CA 90064

310-575-3543x118
sbradley@metahousing.com

Heather Stratman
Principle Strategic Advisors
714-655-7228
hstratman@principlesa.org

Kyle Paine, President
Community Development Partners
3416 Via Oporto, Suite 301
Newport Beach, CA 92663
949-467-1344
kyle@communitydevpartners.com

Bill Vanderschans
Highridge Costa Housing Partners
330 W Victoria Street
Gardena, CA 90248
310-592-6903
bill.vanderschans@housingpartners.com

Jae Mo Koo
Milestone Housing Group
714-904-3667
jae@milestonehousing.com

Michael Aimola
MSA Property Consulting Group
3943 Irvine Blvd, #231
Irvine, CA 92602
949-261-2727x245
maimola@msapcg.com

Todd Cottle
C&C Development
14211 Yorba Street, Suite 200
Tustin, CA 92780
714-288-7600x250
todd@c-cdev.com

Milo Peinemann
American Family Housing
15161 Jackson Street
Midway City, CA 92655

Appendix C:

References

Emergency Solutions Grant References



City of Garden Grove

Protocols for Administering The Emergency Solutions Grant

City of Garden Grove
COMMUNITY DEVELOPMENT DEPARTMENT
NEIGHBORHOOD IMPROVEMENT DIVISION
11222 ACACIA PARKWAY
GARDEN GROVE, CA 92840

OVERVIEW

This document establishes protocols for administering the Emergency Solutions Program (ESG) and replaces previous protocols for the defunct Emergency Shelter Grants Program. The protocols herein incorporate changes in the ESG program pursuant to the Interim Rule (effective January 4, 2012), which established the regulations for the Emergency Solutions Grants Program (ESG). Unlike the former Emergency Shelter Grants Program that emphasized serving the needs of the homeless in emergency or transitional shelters, the focus of the ESG aims at “assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness” (Interim Rule, Federal Register / Vol. 76, No. 233. p. 75954).

Regulatory Authority. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, was promulgated on May 20, 2009, reauthorized and amended the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 et seq) consolidating three homeless assistance programs into one grant program and revising the Emergency Shelter Grants program and renaming it as the Emergency Solutions Grants (ESG) program. The HEARTH Act also codifies into law the Continuum of Care planning process.

Effective January 4, 2012, the Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidated Plan Conforming Amendments interim rule revised the regulations for the Emergency Shelter Grants program by establishing the regulations for the Emergency Solutions Grants program, which replaced the Emergency Shelter Grants program.

Objectives. The ESG Program provides funding to achieve these objectives:

- Engage homeless individuals and families living on the street;
- Improve the number and quality of emergency shelters for homeless individuals and families;
- Help operate these shelters;
- Provide essential services to shelter residents,
- Rapidly re-house homeless individuals and families, and
- Prevent families/individuals from becoming homeless.

Beneficiary Eligibility

City staff will ensure compliance by subrecipients with the minimum eligibility criteria for ESG beneficiaries:

- For essential services related to street outreach, beneficiaries must meet the criteria under paragraph (1)(i) of the “homeless” definition under 24 CFR 576.2, namely:

An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

- For emergency shelter, beneficiaries must meet the “homeless” definition in 24 CFR 576.2.

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that

:(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, faith based or other social networks, to obtain other permanent housing.

- For essential services related to emergency shelter, beneficiaries must be “homeless” and staying in an emergency shelter (which could include a day shelter).
- For homelessness prevention assistance, beneficiaries must meet the requirements described in 24 CFR 576.103par. That is, those who meet the criteria under “At Risk of Homelessness”, and who have an annual income below 30% of the median family income for the area. At Risk of Homelessness” means an individual or family who has an annual income below 30 percent of median family income for the area, as determined by HUD, and does not have sufficient resources or support networks.
- For rapid re-housing assistance, beneficiaries must meet requirements described in 24 CFR 576.104, that is:

Program participants who meet the criteria under paragraph (1) of the “homeless” definition in § 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.

Further eligibility criteria may be established at the local level in accordance with 24 CFR 576.400(e).

Minimum Documentation. The following standards for documenting homelessness are to be monitored by City staff.

<p>Persons living on the street</p>	<p>Certify that the persons served reside on the street.</p>	<p>Provision of services (e.g., outreach, food, health care, clothing) to persons who reside on the streets and not in shelters or other places meant for human habitation), require the outreach or service worker to sign and date a general certification that:</p> <ul style="list-style-type: none"> ▪ verifies that the services are going to homeless persons, and ▪ indicates where the persons served reside.
<p>Persons coming from living on the street (and into a place meant for human habitation)</p>	<p>Obtain information to indicate that the participant is coming from the street.</p>	<p>You must verify that an individual is coming from the street through:</p> <ul style="list-style-type: none"> ▪ organizations or outreach workers who have assisted him/her in the past; ▪ determining where the resident receives assistance checks, if applicable; and/or ▪ other information regarding the participant's recent past activities. <p>Document your verification efforts! Your staff should prepare a statement that is then signed and dated.</p> <p>As a last resort, if you are unable to verify in this manner that the person is coming from living on the street, the participant or a staff member may prepare a short written statement about the participant's previous living place and have the participant sign the statement and date it.</p>
<p>Persons coming from an emergency shelter</p>	<p>Verify from the emergency shelter staff that the participant has been residing at the emergency shelter.</p>	<p>You need to obtain from the referring agency a written, signed, and dated verification that the individual has been a resident of the emergency shelter.</p>

<p>Persons coming from a transitional housing</p>	<p>Verify with the transitional housing staff that:</p> <ul style="list-style-type: none"> ▪ the participant has been residing at the transitional housing; and ▪ the participant was living on the streets or in an emergency shelter prior to living in the transitional housing facility or was discharged from an institution or evicted prior to living in the transitional housing and would have been homeless if not for the transitional housing. 	<p>You must obtain from the referring agency two written, signed, and dated verifications:</p> <ul style="list-style-type: none"> ▪ a signed statement from the transitional housing staff indicating that the individual had been a resident there; and ▪ the referring agency's written, signed, and dated verification as to the individual's homeless status when he/she entered their program. <p>If the referring agency did not verify the individual's homeless status upon entry into their program, you will need to verify that status yourself. That is, in addition to the written, signed, and dated verification from the referring agency that the individual has been residing in the transitional housing, you need to verify their status upon entry into transitional housing and document that status according to the instructions here.</p> <p>(For example, if the person was living on the streets before moving into the transitional housing, you will need to obtain the documentation required under "Persons coming from living on the street" above).</p>
<p>Persons being evicted from a private dwelling</p>	<p>Have evidence of the eviction proceedings.</p>	<p>You need to obtain two types of information:</p> <ul style="list-style-type: none"> ▪ Documentation of: <ul style="list-style-type: none"> ✓ the income of the participant; ✓ what efforts were made to obtain housing; and ✓ why, without the homeless assistance, the participant would be living on the street or in an emergency shelter. ▪ Documentation of one of the following: <ul style="list-style-type: none"> ✓ For formal eviction proceedings, evidence that the participant was being evicted within the week before receiving homeless assistance; ✓ Where a participant's family is evicting, a signed and dated statement from a family member describing the reason for the eviction; ✓ Where there is no formal eviction process (in

<p>Persons from a short term stay (up to 30 consecutive days) in an institution who previously resided on the street or in an emergency shelter</p>	<p>Verify from the institution staff that the participant has been residing at the institution and was homeless before entering the institution</p>	<p>these cases, persons are considered evicted when they are forced out of the dwelling unit by circumstances beyond their control), two things are needed:</p> <ul style="list-style-type: none"> ▪ a signed and dated statement from the participant describing the situation; and ▪ documentation and verification (through written, signed, and dated statements) of efforts to confirm that these circumstances are true. <p>You must obtain:</p> <ul style="list-style-type: none"> ▪ written verification from the situation's staff that the participant has been residing in the institution for less than 31 days; and ▪ information on the previous living situation. Preferably, this will be the institution's written, signed, and dated verification on the individual's homeless status when he/she entered the institution. If the institution's staff did not verify the individual's homeless status upon entry into the institution, you will need to verify that status yourself, according to the instructions above (i.e., if the person was living on the streets before moving into the institution, you will need to obtain the documentation required under "Persons coming from living on the street").
<p>Persons being discharged from a longer stay in an institution</p>	<p>Verify from the institution staff that the participant has been residing at the institution and will be homeless if not provided with assistance.</p>	<p>You need to obtain signed and dated:</p> <ul style="list-style-type: none"> ▪ evidence from the institution's staff that the participant was being discharged within the week before receiving homeless assistance; and ▪ documentation of the following: <ul style="list-style-type: none"> ✓ the income of the participant; ✓ what efforts were made to obtain housing; and ✓ why, without the homeless assistance, the participant would be living on the street or in an emergency shelter.

Persons fleeing domestic violence	Verify that the participant is fleeing a domestic violence situation.	You must obtain written, signed, and dated verification from the participant that he/she is fleeing a domestic violence situation.
		If the participant is unable to prepare the verification, you may prepare a written statement about the participant's previous living situation, have the participant sign, and date it.

SALIENT ESG COMPONENTS

The following summarizes the five allowable ESG components and corresponding activities. Refer to **Exhibit 1** for a detailed summation of ESG components, activities and allowable costs.

- **Street Outreach**. Essential Services necessary to reach out to unsheltered homeless individuals and families, connect them with emergency shelter, housing, or critical services, and provide them with urgent, non-facility-based care. Component services per 24 CFR 576.101 comprise the following:
 - ✓ Engagement,
 - ✓ Case management,
 - ✓ Emergency health and mental health services,
 - ✓ Transportation.

- **Emergency Shelter**. Per 24 CFR 576.102, ESG funds may be used to renovate a building to serve as an emergency shelter. Site must serve homeless persons for at least 3 or 10 years, depending on the cost and type of renovation (major rehabilitation, conversion, or other renovation). Note: Property acquisition and new construction are ineligible.
 - ✓ Essential Services for individuals and families in emergency shelter. Component services generally consist of case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, and transportation.
 - ✓ Shelter Operations, including maintenance, rent, security, fuel, equipment, insurance, utilities, and furnishings.
 - ✓ Relocation assistance for persons displaced by a project assisted with ESG funds.

- ✓ **Homelessness Prevention.** Housing relocation and stabilization services and/or short and/or medium-term rental assistance necessary to prevent the individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in § 576.2.

Component services and assistance generally consist of short-term and medium-term rental assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair. For specific requirements and eligible costs, see 24 CFR 576.103, 576.105, and 576.106.

- **Rapid Re-Housing.** Housing relocation and stabilization services and short and/or medium-term rental assistance as necessary to help individuals or families living in an emergency shelter or other place described in paragraph (1) of the “homeless” definition move as quickly as possible into permanent housing and achieve stability in that housing.

Component services and assistance generally consist of short-term and medium-term rental assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair. For specific requirements and eligible costs, see 24 CFR 576.104, 576.105, and 576.106.

The following chart summarizes the ESG components and related activities:

Component s	ESG Eligible Activities														
	Renovation/ Rehab	Essential Services	Operations	Housing	Relocation & Stabilization/ Financial Assistance Housing	Relocation & Stabilization/ Financial Services	Rental Assistance								
Street Outreach		✓													
Shelter	✓	✓	✓												
Homeless Prevention					✓			✓							✓
Rapid Re-Housing					✓			✓							✓

ESG funds are also used for the following:

- **HMIS.** Grant funds may be used for certain Homeless Management Information System (HMIS) and comparable database costs, as specified at 24 CFR 576.107.
- **Administration.** Pursuant to 24 CFR 576.108., up to 7.5% of a recipient's fiscal year grant can be used for administrative activities, such as general management, oversight, coordination, and reporting on the program. State recipients must share administrative funds with their subrecipients who are local governments and may share with their subrecipients who are nonprofit organizations.

SALIENT MONITORING COMPONENTS

City staff will monitor subrecipients to ensure compliance with ESG requirements outlined below.

The Eligibility Evaluation form and the Subrecipient Agreement will include the following performance objective and performance outcome by ESG activity category.

ESG Activity Category in IDIS	Performance Objective		Performance Outcome	
	Create	Provide Decent	Availability/ Accessibility	Affordability
	Suitable Living Environments	Affordable Housing		
Shelter	✓		✓	
Street Outreach	✓		✓	
Homeless Prevention		✓		✓
Rapid Re-Housing		✓		✓

Obligation & Expenditure Deadlines

In accordance with 24 CFR 576.203, the City is to adhere to the following deadlines:

ESG Timeliness Requirement	Timeframe
Obligate funds (from the date HUD signs the grant agreement)	60 Days
Select subrecipient organizations	120 Days
Reimburse subrecipient organizations	30 Days
Expend all ESG funds	2 Years

In addition, an Emergency Shelter facility must be maintained and used for the homeless based upon minimum time periods (See 24 CFR 576.102(c)(1)) according to the types of activities assisted with ESG funds. Emergency Shelter Facilities (24 CFR 576.2) comprise facilities primarily intended to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which do not require occupants to sign leases or occupancy agreements.

Emergency Shelter Activities	Timeframe
Major Rehabilitation	10 years after the date the building is first occupied by a homeless individual or family after the completed Rehabilitation, if Rehabilitation costs exceed 75 percent (75%) of the value of the building before Rehabilitation. A recorded deed or use restriction is required.
Conversion	10 years after the date the building is first occupied by a homeless individual or family after the completed Conversion, if Conversion costs exceed 75 percent of the value of the building after Conversion. A recorded deed or use restriction is required.
Renovation	3 years after the date the building is first occupied by a homeless individual or family after the completed Renovation.
Shelter Operations or Essential Services	Term of the Standard Agreement, without regard to a particular site or structure, so long as the Applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

GENERAL REQUIREMENTS

Along with monitoring activity eligibility, cost eligibility and proper documentation to support beneficiary eligibility, City staff will also ensure compliance with the following general requirements.

- **Uniform Administrative Requirement.** ESG regulations at 24 CFR 576.407(c) require the governmental agencies apply 24 CFR Part 85, except for 24 CFR 85.24 and 85.42, and program income is to be used as match under 24 CFR 85.25 (g). The requirements of 24 CFR Part 84 apply to Private Nonprofit subrecipients, except for 24 CFR 84.23 and 84.53, and program income is to be used as the non-Federal share under 24 CFR 84.24 (b).

- **Homeless Participation.** Under 24 CFR 576.405 the City is ensure subrecipients provide for the participation of not less than one homeless individual or formerly homeless individual on the Board of Directors or other equivalent policy-making entity, to the extent that the entity considers and makes policies and decisions regarding any facilities, services or other assistance that receives funding under ESG.

- **Program Termination.** The City will review the termination/denial policy in each subrecipient's Written Standards to verify that the following minimal components are included: a progressive discipline warning system, written notices, a formal appeal process, and consideration of the appeal by someone not involved in the original termination. Staff will also monitor each subrecipient's compliance with ESG regulations at 24 CFR 576.402 to ascertain whether persons or families receiving assistance who violate program requirements are terminated only in the most severe cases. The subrecipient is required to terminate assistance in accordance with a formal process that has been established and that recognizes the rights of individuals or families affected.

City staff will monitor compliance with the following area-wide systems coordination requirements pursuant to 24 CFR 576.400.

- **Consultation with CoCs.** Staff will assist subrecipients are to consult with the CoC to (1) determine how ESG funds will be allocated in that region; (2) identify the performance standards for evaluating the outcomes of projects and activities; and (3) identify the funding, policies and procedures for the administration and operation of the HMIS, if appropriate

- **Coordination with Other Targeted Homeless Services.** City staff will monitor subrecipients to verify that other programs are targeted to homeless people in the area covered by the CoC to provide a strategic, community-wide system to prevent and end homelessness for that area.

- **System and Program Coordination with Mainstream Resources.** The subrecipient is to coordinate and integrate ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible.

- **Centralized or Coordinated Assessment.** Each ESG-funded subrecipient is to work with the CoC to ensure the screening, assessment and referral of participants are consistent with the Written Standards. A Victim Service Provider may choose not to use the CoC Centralized or Coordinated Assessment System.

- **Written Standards** .Once the CoC has developed Written Standards in accordance with the requirements outlined in 24 CFR 576.400(e)(2)(3), Each subrecipient is to use the CoC's Written Standards.

- **Participation in HMIS.** The subrecipient is to ensure that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database in accordance with HUD's standards on participation, data collection and reporting under a local HMIS. If the subrecipient is a Victim Service Provider or a Legal Services Provider, it may use a comparable database that collects client level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

City staff will monitor each subrecipient's compliance with other federal and state requirements set forth at 24 CFR 576.406-576.408.

- Per 24 CFR 576.407(a), the subrecipient is to adhere to the requirements in 24 CFR Part 5, Subpart A, including the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a). Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 41701u, and implementing regulations at 24 CFR Part 135 apply, except that homeless individuals have priority over other Section 3 residents in accordance with 24 CFR 576.405(c).

- **Faith-Based Activities.** Religious organizations may receive ESG funds if agreeable to providing all eligible ESG activities in a manner that is in accordance with 24 CFR 576.406. ESG funds may not be used for the rehabilitation of structures if those structures are used for inherently religious activities. Where a structure is used for both eligible and inherently religious activities, funds may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the federal cost accounting requirements. Sanctuaries, chapels, or other rooms the religious congregation uses as its principal place of worship are ineligible for ESG-funded improvements. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (See 24 CFR Parts 84 and 85).

- Organizations that are religious or faith-based are eligible to receive ESG funds but may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. Refer to 24 CFR 576.406 for additional details.

- **Affirmative Outreach.** As required under 24 CFR 576.407(b), the subrecipient is to establish procedures that ensure the use of the facilities, assistance, and services are available to all on a nondiscriminatory basis.

- **Displacement, Relocation, and Acquisition.** In accordance with 24 CFR 576.408, the displacement of persons as a result of a Components/Activities assisted with ESG funds must be provided Relocation Assistance pursuant to the URA and 49 CFR Part 24. Temporary relocation is not permitted. No tenant occupant of housing (a dwelling unit) that is converted into an Emergency Shelter may be required to relocate temporarily for a Component/Activity assisted with ESG funds or be required to move to another unit in the same building/complex. The acquisition of real property, whether funded privately or publicly, for a Component/Activity assisted with ESG funds is subject to the URA and the federal government-wide regulations at 49 CFR Part 24, Subpart B. Refer to 24 CFR 576.408 for additional details.

- **Match.** City staff will monitor matching contributions from each subrecipient to verify that the amount of match equals the amount of ESG funds received per 24 CFR 576.201, and that the match sources include any federal source other than the ESG Program, as well as State, local, and private sources (see 24 CFR 576.201).

- **Shelter and Housing Standards.** City staff will require per 24 CFR 576.403 that any ESG-assisted shelter to meet minimum Habitability Standards. Shelters renovated with ESG funds, are to meet State or local government Safety and Sanitation Standards, as applicable, include energy-efficient appliances and materials, as well as incorporate lead-based paint remediation and disclosure requirements.

- **Recordkeeping and Reporting Requirements.** City staff will monitor subrecipients have written policies and procedures to ensure that ESG funds are used in accordance with requirements at 24 CFR 576.500. In addition, sufficient records must be established and maintained to enable HCD and HUD to determine whether ESG requirements are being met. Refer to for additional details. (24 CFR 576.500):
 - ✓ **Homeless status.** Follow written intake procedures to ensure compliance with the homeless definition in § [576.2](#). The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status.
 - ✓ **At risk of homelessness status.** For each individual or family who receives ESG homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications.
 - ✓ **Determinations of ineligibility.** For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.
 - ✓ **Annual income.** For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year
 - Income evaluation form completed by the subrecipient; and
 - Source documents for the assets held by the program participant and income received over the most recent period (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement);

- If source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
- If source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is expected to receive over the 3-month period following the evaluation.
- ✓ **Program participant records.** In addition to evidence of homeless status or “at risk of homelessness” status, as applicable, records must be kept for each program participant that document:
 - The services and assistance provided to program participant, including the security deposit, rental assistance, and utility payments made on behalf of the program participant;
 - Compliance with the applicable requirements for providing services and assistance to t program participant under the program components and eligible activities provisions at § [576.101](#) through §[576.106](#), the provision on determining eligibility and amount and type of assistance at § [576.401\(a\) and \(b\)](#), and the provision on using appropriate assistance and services at § [576.401\(d\) and \(e\)](#); and
 - Where applicable, compliance with the termination of assistance requirement in § [576.402](#).
- ✓ **Centralized or coordinated assessment systems and procedures.** Documentation evidencing written intake procedures for, the centralized or coordinated assessment system(s) developed by the CoC.
- ✓ **Rental assistance agreements and payments.** The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.
- ✓ **Utility allowance.** The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.
- ✓ **Shelter and housing standards.** Documentation of compliance with the shelter and housing standards in § [576.403](#), including inspection reports.
- ✓ **Emergency shelter facilities.** The amount and type of assistance provided to each emergency shelter.
- ✓ **Services and assistance provided.** Types of essential services, rental assistance, and housing stabilization and relocation services and the amounts spent on these services and assistance. Subrecipients that are units of general-purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general-purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.
- ✓ **Coordination with CoC and other programs.** Document their compliance with the requirements of § [576.400](#) for consulting with the CoC and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.
- ✓ **HMIS.** Records of the participation in HMIS or a comparable database by all projects.
- ✓ **Matching.** The recipient must keep records of the source and use of contributions made to satisfy the matching requirement in § [576.201](#). The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third party,

noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

- ✓ **Conflicts of interest.** Records to show compliance with the organizational conflicts-of-interest requirements in § [576.404\(a\)](#), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in § [576.404\(b\)](#), and records supporting exceptions to the personal conflicts of interest prohibitions.
- ✓ **Homeless participation.** Document compliance with the homeless participation requirements under § [576.405](#).
- ✓ **Faith-based activities.** Document compliance with the faith-based activities requirements under § [576.406](#).
- ✓ **Other Federal requirements.** Document compliance with the Federal requirements in § [576.407](#), as applicable, including:
 - Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under § [576.407\(a\)](#), including data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds and the affirmative outreach requirements in § [576.407\(b\)](#).
 - Records demonstrating compliance with the uniform administrative requirements in 24 CFR part [85](#) (for governments) and 24 CFR part [84](#) (for nonprofit organizations).
 - Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.
 - Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part [87](#).
- ✓ **Relocation.** Document compliance with the displacement, relocation, and acquisition requirements in § [576.408](#).
- ✓ **Financial records.**
 - Supportive documentation for all costs charged to the ESG grant.
 - Documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under § [576.101](#)-[576.109](#) and the cost principles in OMB Circulars A-87 (2 CFR part [225](#)) and A-122 (2 CFR part [230](#)).
 - Records of the receipt and use of program income.
 - Documentation of compliance with the expenditure limits in § [576.100](#) and the expenditure deadline in § [576.203](#).
- ✓ **Subrecipients and contractors.**
 - The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable. If the recipient is a State, the recipient must keep records of each recapture and distribution of recaptured funds under § [576.501](#).
 - The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 24 CFR [85.36](#) and 24 CFR 84.40-84.48.
 - The recipient must ensure that its subrecipients comply with the recordkeeping requirements specified by the recipient and HUD notice or regulations.
- ✓ **Confidentiality.**

- Written procedures to ensure:
 - ❑ All records containing personally identifying information of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
 - ❑ The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
 - ❑ The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
 - ❑ Written confidentiality procedures.
- ✓ **Period of record retention.** All records pertaining to each fiscal year of ESG funds must be retained for the greater of 5 years or the period specified below.
 - ❑ Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served;
 - ❑ Where ESG funds are used for the renovation of an emergency shelter involves costs charged to the ESG grant that exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation; and
 - ❑ Where ESG funds are used to convert a building into an emergency shelter and the costs charged to the ESG grant for the conversion exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.
- ✓ **Access to records.**
 - **Federal government rights.** Notwithstanding the confidentiality procedures established under paragraph (w) of this section, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records pertinent to the ESG grant, in order to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period but last as long as the records are retained.
 - **Public rights.** Provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligations of confidentiality and the confidentiality requirements in this part) to records regarding any uses of ESG funds the recipient received during the preceding 5 years.
 - **Reports.** The recipient must collect and report data on its use of ESG funds in the Integrated Disbursement and Information System (IDIS) and other reporting systems, as specified by HUD. The recipient must also comply with the reporting requirements in 24 CFR parts [85](#) and [91](#) and the reporting requirements under the Federal Funding Accountability and Transparency Act of 2006, ([31 U.S.C. 6101 note](#)), which are set forth in appendix A to 2 CFR part [170](#).

THE MONITORING PROCESS

Monitoring of ESG-assisted activities takes place on a quarterly and annual basis.

Quarter Reports

Each quarter, subrecipients submit an ESG Subgrantee Report (**Exhibit 2**), which City staff use to monitor performance measured against the requirements initially outlined in the Eligibility Evaluation (**Exhibit 3**) and Subrecipient Agreement (**Exhibit 4**).

Desk Audit

Desk reviews are done at the City and entail a review of reports and other documentation that are submitted to the City that help the City understand how well a project is managed, and whether it is achieving its goals and compliance obligations.

At the close of each program year, City staff issue a monitoring letter (**Exhibit 5: Monitoring Notification Letter: On-Site Visit** or **Exhibit 6: Annual Monitoring Notification Letter: Desk Audit**) will be sent to the subrecipient transmitting the following documents to be completed and returned to the City prior to the scheduled monitoring visit:

- *Monitoring Notification Letter: Desk Audit*

A Monitoring Notification Letter: Desk Audit will be sent to the owner/property manager detailing the salient terms of the Subrecipient Agreement that will be the source of monitoring.

- **Monitoring Checklist**
This report collects information as a basis for conclusions to be included in the Monitoring Summary letter and follow-up (**Exhibit 7: Monitoring Checklist**).
- **Monitoring Summary**
A Monitoring Summary Letter will be provided to the subrecipient that serves as the formal notification of the results of the monitoring. All negative conclusions will be considered a finding or

concern with a specific required corrective action. A copy is retained in the Project monitoring file.

- ✓ A “finding” is a deficiency in project performance evidencing an unmet statutory or regulatory requirement.

- ✓ A “concern” relates to project performance-requiring improvement before becoming a finding.

The subrecipient is to provide a written response within 30 days of the date of the Monitoring Summary letter. Upon completion of all corrective actions, a letter is sent to the owner/property manager stating that the monitoring findings and concerns have been closed. A copy is retained in the Project monitoring file.

ON-SITE VISIT

On-site monitoring enables the City to conduct a more in-depth level of review than the desk review and entails a visit to the office of the owner or property manager to review documents and source information, as well as observe operations. On-site monitoring is necessary when the risk analysis or desk review suggests that there may be problems, or if a protracted period of time has elapsed since the last visit.

The following steps are to be taken when monitoring *on-site*:

- **Monitoring Notification Letter: On-Site Visit**

A Monitoring Notification Letter: On-Site Visit will be sent to the owner/property manager at least two weeks in advance of the monitoring visit. The letter will detail the salient terms of the Subrecipient Agreement that will be the source of monitoring. The letter will also notify the owner/property manager of the date and time of an interview that will be conducted to make sure that the owner and/or manager thoroughly understands the purpose, scope, and schedule for the monitoring.

In addition to the aforementioned reports, these items also are to be reviewed:

- **Monitoring Summary**

After the monitoring visit, a Monitoring Summary letter is forwarded to the subrecipient that serves as the formal notification of the results of the monitoring. All negative conclusions are considered a finding or concern with a specific required corrective action. If relevant, the letter may stipulate steps initiated by the owner/property manager to correct areas of noncompliance or nonperformance. A copy is retained in the Project monitoring file.

- ✓ A “finding” is a deficiency in project performance evidencing an unmet statutory or regulatory requirement.

- ✓ A “concern” relates to project performance requiring improvement before becoming a finding.

The owner/property manager is to provide a written response within 30 days of the date of the Monitoring Summary letter. Upon completion of all corrective actions, a letter is sent to the owner/property manager stating that the monitoring findings and concerns have been closed. A copy is retained in the Project monitoring file.