



CITY OF ANAHEIM  
MAYOR CURT PRINGLE

July 29, 2008

The Honorable Nancy Wieben Stock  
Presiding Judge of the Superior Court  
700 Civic Center Drive West  
Santa Ana, CA 92701

**Re: 2007-2008 Orange County Grand Jury Report, "No County for Old Boomers – When Orange County Baby Boomers Retire, Where Will They Live?"**

Dear Judge Wieben Stock,

As Mayor of the City of Anaheim, and in consultation with our City Council, I am sending this letter in response to the 2007-2008 Orange County Grand Jury Report captioned above. The City's response addresses the Orange County Grand Jury Report's findings and recommendations as they relate to the City of Anaheim's draft 2006-2014 Housing Element.

Anaheim's draft Housing Element provides for the identification and analysis of existing and projected housing needs and articulates the City's official policies for the preservation, conservation, improvement and production of housing within the City of Anaheim. On July 11, 2008, the City received comments on the draft Housing Element from the State Department of Housing and Community Development. Comments from the State have generally praised the City for its efforts in preparing the draft Housing Element and providing incentives for new housing production. The State requested additional information and clarification for certain components of the Housing Element to assist in determining the document's compliance with State Housing Element Law; however, none of the State's requests for further information were related to the City's strategies for providing affordable housing to seniors. Staff is in the process of responding to these comments and anticipates Planning Commission and City Council public hearings for the draft Housing Element in late summer/early fall.

The City of Anaheim has taken a number of positive steps to ensure the production of housing to meet the needs of its diverse population, including "Baby Boomers". In 1985, the City adopted the City's Senior Citizen Apartment Projects Ordinance, which provides incentives for the development of affordable housing for seniors. As a result of this ordinance and other related efforts, the City currently has over 2,600 residential units that are age restricted to seniors; 1,100 of these units are

income restricted to moderate and lower income households. More recent efforts have expanded the City's affordable housing strategies by increasing the amount of land designated for residential development, modifying development standards to encourage new construction and creating a focused strategy to address lower income housing.

In 2004, the City adopted a comprehensive update to its General Plan which created tremendous opportunities for additional residential development. Not only were several hundred acres of the City re-designated for residential and mixed-use development, but several policies were also created that collectively serve to facilitate various forms of infill residential development. For example, one of the primary objectives of the updated General Plan is to provide additional land use options for under-utilized strip retail sites along the City's major corridors by designating many of these sites for a variety of residential densities.

In 2005, the City Council adopted an Affordable Housing Strategic Plan with a goal of developing 1,328 affordable rental housing units by the end of 2009. Implementation of this plan has been so effective that the City anticipates exceeding this goal. Two thirds of these units will target Low and Very Low Income households. The City was not mandated to create the strategic plan or set this production goal. Instead, the City Council proactively sought to address this issue. In addition to building these 1,300-plus units, the City has pursued other incentives to further encourage the development of affordable housing, such as a new Density Bonus ordinance which includes incentives beyond those required under State law and an expedited plan review process for affordable housing projects. The Density Bonus ordinance and the expedited plan review process represent significant incentives that are available to developers of affordable senior housing.

As indicated above, the City has shown a commitment to addressing the housing needs of a range of age groups. This commitment is further documented in the City's draft Housing Element. The responses that follow indicate agreement or disagreement, either wholly or partially, with each of the Grand Jury's findings and recommendations. Some of the recommendations, although not required by State law, are already being implemented by the City. In other cases, the recommendations are inconsistent with the level of analysis required by State Housing Element law. The City agrees that planning for the housing needs of all of its residents, including seniors, is an important issue. Anaheim will continue to address its housing needs by providing for a balanced variety of housing types. This balanced approach will ensure that the City does not over-emphasize one area of housing at the expense of another.

**Finding F-1:** The Housing Elements for the cities and County of Orange do not reflect that the number of affordable senior housing units in Orange County will not accommodate the projected population.

**Response to Finding F-1:** *The City disagrees with this Finding as it relates to the City of Anaheim.* The City's Housing Element is required by State law to address housing for special needs groups, including the senior population, within its jurisdiction. The draft Housing Element

includes an analysis of this population and strategies for addressing senior housing needs, including the needs of lower income seniors (see Attachments 1-3).

**Finding F-2:** The Housing Elements for the County of Orange and the cities do not focus sufficiently on or analyze the population growth and housing needs of the aging baby boomer population.

**Response to Finding F-2:** *The City disagrees with this Finding as it relates to the City of Anaheim.* Section 4.a. (Elderly Persons) of Chapter 2 (Housing Needs Analysis) of the City of Anaheim's draft 2006-2014 Housing Element provides analysis of the population growth and housing needs for residents that are 62 years or older (see Attachment 1).

**Finding F-3:** Not all Housing Elements are available online for easy access by the public.

**Response to Finding F-3:** *The City disagrees with this Finding as it relates to the City of Anaheim.* Anaheim's current Housing Element and the draft 2006-2014 Housing Element are available on-line at [www.anaheim.net](http://www.anaheim.net).

**Finding F-4:** Municipalities are not proactive enough in encouraging the development of affordable senior housing.

**Response to Finding F-4:** *The City disagrees with this Finding as it relates to the City of Anaheim.* Chapter 4 (Housing Policy Program) of the City of Anaheim's draft 2006-2014 Housing Element includes several strategies for encouraging the development of affordable senior housing (see Attachment 2). These strategies refer to both senior and special needs populations, as well accommodating persons with disabilities. People that are age 62 and older are defined by the State of California as a special needs population and have a higher likelihood of having one or more disabilities as compared to other age groups.

**Recommendation R-1:** Include the current and projected affordable senior housing inventory by type, location and cost in the 2008 and future years' development of the Housing Element.

**Response to Recommendation R-1:** *The recommendation will not be implemented.* The data and analysis requested by the Grand Jury is not consistent with the level of analysis required by State Housing Element law.

**Recommendation R-2:** Include sufficient data in the Housing Element to acknowledge the imminent growth of the county's aging population. This data is to include the current population and the growth trend of the aging baby boomer generation as well as the current median income and the income trend of the senior population.

**Response to Recommendation R-2:** *The recommendation has been implemented, in part.* Chapter 2 (Housing Needs Analysis) of the draft 2006-2014 Housing Element provides analysis of the growth/population trends for all of the City's age groups (see Attachment 3). Income

analysis specifically related to seniors is not consistent with the level of analysis required by State Housing Element law.

**Recommendation R-3:** Put all Housing Elements online on each city's website.

**Response to Recommendation R-3:** *The recommendation has been implemented.* Anaheim's current Housing Element and the draft 2006-2014 Housing Element are available on-line at [www.anaheim.net](http://www.anaheim.net).

**Recommendation R-4:** Confer with developers to establish the needs for affordable senior housing and to encourage investment in future projects.

**Response to Recommendation R-4:** *The recommendation has been implemented.* Chapter 4 (Housing Policy Program) of the City of Anaheim's draft Housing Element includes strategies for conferring with developers to establish the need for affordable housing for seniors and special needs households (seniors are considered a special needs household) and to encourage investment in future projects (see Attachment 2).

The City of Anaheim is committed to providing a range of housing opportunities to meet its diverse population, including aging Baby Boomers. Anaheim's draft Housing Element provides strategies for the construction of new affordable housing for seniors, as well as tools to allow seniors to "age in place" in their own homes. Anaheim understands that meeting the changing housing needs of our City's residents strengthens our community and provides benefit to both the City of Anaheim and Orange County.

Sincerely,



Curt Pringle  
Mayor

CJA/JB/SR

Attachments:

1. Chapter 2, Section B.4.a. (Elderly Persons), City of Anaheim Draft 2006-2014 Housing Element
2. Chapter 4, Strategies 1E, 1H, 3C, and 3D, City of Anaheim Draft 2006-2014 Housing Element
3. Chapter 2, Section B.1.b. (Age Composition), City of Anaheim Draft 2006-2014 Housing Element

**Chapter 2, Section B.4.a. (Elderly Persons)  
City of Anaheim Draft 2006-2014 Housing Element**

**a. Elderly Persons**

Elderly persons are considered a special needs group because they are more likely to have fixed incomes. Elderly persons are defined by the US Department of Housing and Urban Development (HUD) as persons age 62 years and older. Elderly persons often have special needs related to housing location and construction. Because of limited mobility, elderly persons typically need access to public facilities (i.e. medical and shopping) and public transit. In terms of housing construction, elderly persons may need ramps, handrails, elevators, lower cabinets and counters and special security devices to allow for greater self-protection.

According to the 2000 U.S. Census, 8 percent of Anaheim's residents were elderly. As shown in Table 2-34, approximately 15 percent of Anaheim's households had an elderly householder in 2000 and an estimated 16 percent of households had an elderly householder in 2006.

**Table 2-34  
Householders by Tenure and Age  
2001 and 2006<sup>1</sup>**

Householder Age	2001		2006 <sup>1</sup>	
	Units	%	Units	%
15-24 years	4,206	4.3%	3,857	3.9%
25-34 years	21,364	22.1%	17,079	17.3%
35-64 years	56,373	58.2%	61,870	62.7%
65-74 years	7,948	8.2%	8,484	8.6%
75 plus years	6,958	7.2%	7,446	7.5%
<b>Total</b>	<b>96,849</b>	<b>100%</b>	<b>98,736</b>	<b>100%</b>

Notes:

<sup>1</sup>Estimated data from 2006 American Community Survey for illustrative purposes only.

Source: U.S. Census 2000 SF3 H14 and 2006 ACS B25007

The U.S. Census Bureau provides information on the number of persons with disabilities of varying types and degrees. The two categories of physical disabilities which affect a person's need for special needs related to the construction and location of housing are self care disability and going outside the home disability. Persons with self-care disabilities report having difficulty dressing, bathing or getting around inside the home. Persons with going outside the home disabilities have difficulty going outside the home alone to shop or visit a doctor's office.

Sixteen percent of the elderly population had a self-care or go-outside-the-home disability in 2000. Of those with a disability, the majority had a self-care disability as well as at least one other disability.

The 2006 American Community Survey estimates 21.3 percent of Anaheim's elderly population had a go-outside-the-home disability and 11.9 percent had a self-care disability.

**Table 2-35**  
**Elderly with Disabilities Limiting Independent Living**  
**2000 and 2006**

Disability Status	2000		2006 <sup>1</sup>	
	Total	% of People 65+	Total	% of People 65+
With one type of disability	5,009	20.2%	4,505	14.6%
With two or more types of disability	5,897	23.5%	6,737	21.8%
<b>Total with a Disability</b>	<b>10,906</b>	<b>43.7%</b>	<b>11,242</b>	<b>36.4%</b>

Notes:

<sup>1</sup> Estimated data from 2006 American Community Survey for illustrative purposes only.

Source: U.S. Census 2000 SF3 PCT 26, 2006 ACS B18001

**Chapter 4, Strategies 1E, 1H, 3C, and 3D  
City of Anaheim Draft 2006-2014 Housing Element**

**Housing Production Strategy 1E: Affordable Senior Housing Program**

The City recognizes the unique needs of its senior population. Seniors typically have fixed incomes and unique housing needs that are not generally included in market rate housing. The City shall continue to encourage through incentives (e.g. financial assistance, parking reductions, regulatory waivers, etc.) the development of a wide range of housing choices for seniors ranging from independent living to assisted living with services on-site, including healthcare, nutrition, transportation and other appropriate services. The City currently provides incentives for affordable senior housing through the Senior Citizens' Apartment Project and Density Bonuses chapters of its Municipal Code.

<b>Objective:</b>	Senior Housing Development
<b>Responsible Party:</b>	Planning
<b>Source of Funds:</b>	General Fund
<b>Timeline for Implementation:</b>	Ongoing

**Housing Production Strategy 1H: Encourage the Development of Housing for Special Needs Households**

The City of Anaheim understands the need for housing to accommodate special needs households. Historically, the City has assisted in the development of housing projects for special needs households by providing technical assistance, and public funds, including: ESG, CDBG, HOME and Redevelopment funds. The City shall continue to encourage and support the development of rental housing for special needs families within future affordable housing projects. Developers and builders of such projects will be required to incorporate specialized social services to assist the special needs households.

<b>Objective:</b>	Develop units for special needs households
<b>Responsible Party:</b>	Redevelopment/Planning
<b>Source of Funds:</b>	ESG/CDBG/HOME/Redevelopment/General Fund
<b>Timeline for Implementation:</b>	Annually

### Housing Quality and Design Strategy 3C: Adopt Reasonable Accommodation Procedures

The City understands the importance of providing equal housing opportunity for persons with special needs. Persons with disabilities may require reasonable accommodations to meet their particular housing needs. To comply with federal and state housing laws, the City will analyze existing land use controls, building codes, and permit and processing procedures to determine constraints they impose on the development, maintenance, and improvement of housing for persons with disabilities. Based on its findings, the City will develop a policy for reasonable accommodation to provide relief from Code regulations and permitting procedures that may have a discriminatory effect on housing for individuals with disabilities. The policy shall include procedures for requesting accommodation, timeline for processing and appeals, criteria for determining whether a requested accommodation is reasonable, and ministerial approval for minor requests.

<b>Objective:</b>	Adopt Policy/Procedures
<b>Responsible Party:</b>	Planning
<b>Source of Funds:</b>	General Fund
<b>Timeline for Implementation:</b>	June 2009

### Housing Quality and Design Strategy 3D: Universal Design

The City recognizes that all people have varying abilities and that many people will encounter temporary or permanent changes in ability to conduct the tasks necessary for daily living throughout their lives. Universal Design features create housing suited for people of all abilities and can allow residents to stay in their homes over their lifetime. The City shall explore programs and incentives to encourage provision of Universal Design features in housing.

<b>Objective:</b>	Explore programs and incentives for Universal Design
<b>Responsible Party:</b>	Planning
<b>Source of Funds:</b>	General Fund
<b>Timeline for Implementation:</b>	December 2009



**Chapter 2, Section B.1.b. (Age Composition)  
City of Anaheim Draft 2006-2014 Housing Element**

**b. Age Composition**

Between 1990 and 2000, Anaheim experienced growth in the percentages of the “pre-school” (0-4 years) and “school age” (5-17 years) populations, while the percentages of “young adult” (18-24 years) through “senior citizen” (65+ years) populations declined. The “prime working” (25-54 years) population remains the largest age group in the City.

According to estimates from the 2006 American Community Survey, the percentage of “retirement age” and “senior citizens” in Anaheim has increased since 2000. The “retirement” age group is estimated to be 7.9 percent of the City’s total population. The “senior citizen” age group is estimated to be 9.4 percent of the City’s total population.

**Table 2-3  
Age Distribution  
1990-2006**

Age Group	1990		2000		2006 <sup>1</sup>	
	Number	% of Population <sup>2</sup>	Number	% of Population <sup>2</sup>	Number	% of Population <sup>2</sup>
Preschool (0-4 years)	22,966	8.6%	30,116	9.2%	30,887	9.0%
School (5-17 years)	46,067	17.3%	68,872	21.0%	69,810	20.3%
Young Adult (18-24 years)	34,877	13.1%	33,995	10.4%	34,465	10.0%
Prime Working (25-54 years)	121,007	45.4%	146,440	44.7%	149,423	43.4%
Retirement (55-64 years)	19,925	7.5%	21,659	6.6%	27,190	7.9%
Senior Citizen (65+ years)	2,1564	8.1%	26,275	8.0%	32,366	9.4%
<b>Total</b>	<b>266,406</b>	<b>100%</b>	<b>327,357<sup>3</sup></b>	<b>100%</b>	<b>344,141</b>	<b>100%</b>

Notes:

<sup>1</sup>Estimated data from 2006 American Community Survey for illustrative purposes only.

<sup>2</sup>Percentages may not add up to 100% due to rounding.

<sup>3</sup>Discrepancy in 2000 SF3 total population data due to sampling error.

Source: U.S. Census 1990 STF3, P013, U.S. Census 2000 SF3, P8, 2006 ACS B01001