



June 26, 2008

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

SUBJECT: Response to "No County for Old Boomers - When Orange County Baby Boomers Retire, Where Will They Live?"

Dear Honorable Judge Nancy Wieben Stock:

The City of Tustin received the 2007-08 Grand Jury report, "No County for Old Boomers - When Orange County Baby Boomers Retire, Where Will They Live?" The City of Tustin agrees that it is important to be mindful of our senior population and would ensure that adequate housing units are available to our seniors from various economic segments. During the preparation of the City's Housing Element, various data and analyses related to the City's aging population were collected and programs and policies were adopted to ensure appropriate measures are implemented. Accordingly, the City has prepared the attached response to the Grand Jury report and recommendations.

If you should have any questions, please do not hesitate to call Elizabeth A. Binsack, Community Development Director, at 714-573-3031.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Amante".

Jerry Amante
Mayor

Attachment: Response to the 2007-08 Grand Jury report, "No County for Old Boomers - When Orange County Baby Boomers Retire, Where Will They Live?"

C: Ann Avery Andres, Foreman, Orange County Grand Jury, 700 Civic Center West, Santa Ana, CA 92701
City of Tustin Councilmembers
William A. Huston, City Manager
Elizabeth A. Binsack, Community Development Director

S:\Cdd\JUSTINA\OC grand jury (No County for Old Boomers).doc

City of Tustin
Response to Orange County Grand Jury
No County for Old Boomers – When Orange County
Baby Boomers Retire, Where Will They Live

Findings

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: The City disagrees partially with the finding. The City cannot speak for the countywide supply of affordable senior housing units. However, for the City of Tustin, the City's Housing Element provided analysis of senior housing needs in Tustin as follows:

Table HTM-2 of the Housing Element Technical Memorandum identifies 7.1 percent of the population in 2000 were persons aged 65 years or older. Table H-7 of the Housing Element shows the tenure of households with the head of household aged 65 years or older in the City of Tustin in 2000. The City had 747 renter households and 2,086 owner households with a head of household aged 65 years or older. Households with a senior householder represented 11.9 percent of all households in the City.

Tenure	Head of Household 65 Years or Older	
	# Households	% Households
Renters	747	6.2% ¹
Owners	2,086	17.6% ²
Total Households	2,833	11.9%³

¹ As a percentage of 12,002 renter households.

² As a percentage of 11,829 owner households.

³ As a percentage of 23,831 total households.

Source: 2000 U.S. Census; Comprehensive Affordable Housing Strategy 2008 – 2018.

Table H-7A shows the estimated household income distribution for householders aged 65 years or older in 2000. Approximately 27 percent of elderly households earned less than \$20,000 annually or about 36 percent of AMI for a household of two persons in 2000.¹

¹ HUD median household income for a family of four in Orange County in 2000 was \$69,600.

TABLE H-7A
Estimated Household Income Distribution
Households with Head of Household Aged 65 Years or Older
2000

Income Range	Number ¹	Percent	Cumulative %
Less Than \$10,000	300	10.4%	10.4%
\$10,000-\$19,999	467	16.2%	26.6%
\$20,000-\$34,999	618	21.4%	48.0%
\$35,000-\$49,999	439	15.2%	63.2%
\$50,000-\$74,999	520	18.0%	81.2%
\$75,000-\$99,999	211	7.3%	88.5%
\$100,000 or More	332	11.5%	100.0%
Total Households	2,887	100.0%	

¹ Derived by applying the percentage of households with head of household aged 65 years or older by income category from Summary File 3 Table P55 (based on sample data; total number of households shown as 23,853) to a total of 23,831 households from Summary File 1, Table H-1 for consistency with other Census data on the number of households used in this report.

Source: 2000 U.S. Census; Comprehensive Affordable Housing Strategy, 2008-2018.

In addition to identifying the current needs of the City's senior population, the City also adopted policies to ensure adequate housing are available to the senior population. The following are examples of policies adopted:

Policy 1.14: Encourage the availability of affordable housing for special needs households, including large, low-income families. Special needs households include the elderly, large families, female-headed households, households with a disabled person, and the homeless (see discussion under Summary of Housing Needs for Special Needs Groups).

Policy 1.17: Encourage the design and occupancy of housing for senior citizens and the disabled. Promote the construction or rehabilitation and adoption of dwelling units accessible to seniors and/or the disabled.

The City also included in Table H-17 of the New Construction objective table in the Housing Element identifying construction goals during the Housing Element planning period. Included in the table are several projects involving seniors. For example: within the MCAS Tustin Housing Units, 240 senior housing units are being constructed, 153 units will be set-aside for affordable ownership senior housing. A total of 201 units of assisted living/congregate care facility for persons of 62 years and older are also anticipated to be completed during the planning period. Potential 10 new granny units are also expected. Lastly, a developer (TLCP) has expressed their interest in developing a senior congregate

care facility at Tustin Legacy. The City will actively confer and negotiate with the developer to support the proposed project. However, actual timing on this proposal is contingent on developer's timing and market conditions. (For information on Tustin's senior housing stock, please see response under F-4)

**TABLE H-17
 NEW CONSTRUCTION QUANTIFIED OBJECTIVES SUMMARY
 CITY OF TUSTIN
 2006-2014**

Program	Total # of Units	Very Low ⁵ (<50%)	Low (<80%)	Moderate (80-120%)	Upper (120%+)
NEW CONSTRUCTION					
MCAS Tustin Housing Units ¹	3,645	199 ⁴	220 ⁴	342 ⁴	2,884
MCAS Tustin Emergency Housing ²	192	192			
MCAS Tustin Transitional Family Housing	48	48			
MCAS Tustin Social Services ²	90	90			
Granny Flats	10		10		
New Owner Housing ³	155		155		
New Senior Housing	201			126	75
Recycling of SFD to MFD	25		25		
Total Quantified Objectives	4,366	529	410	468	2,959
RHNA	2381	512	410	468	991
Difference	1,985	17	0	0	1,968

¹ MCAS Tustin Specific Plan authorized a total 4,049 potential units at Tustin Legacy. Based upon State Redevelopment Law and the proposed Specific Plan requirement, at least 15 percent of the total units (607 units) would be affordable to Very-Low, Low, and Moderate income households, of which at least 6 percent or 243 units would be affordable to Very Low income households. See footnote 4 for additional inclusionary units information.
² These housing units shown as separate line items will serve as transitional/emergency housing facilities. The City counts these units as new construction as they are new additions to the housing inventory.
³ Projects at the end of planning period.
⁴ Includes MCAS Tustin additional inclusionary units (296 units)
⁵ Pursuant to Government Code Section 65583(a)(1), City's share of extremely-low income units is 211 (8.85 percent of the total RHNA new construction objective). Total number of units for extremely-low income and low income units equals to City's share of vey-low income units of 512 units

Source: 2007 RHNA; City of Tustin; MCAS Tustin Specific Plan.

The City also has identified in the Housing Element of the following programs to accommodate the needs of the seniors:

Program 1.16 - Senior Citizen Housing: Continue to identify sites that are suitable for senior citizens housing projects. These sites will be promoted for private development and applications will be made for any available subsidy funds.

Program 4.5 - Affordable Senior Housing Project and Senior Board and Care Facility: To maintain 74 units of affordable housing for seniors

located at 17432-17442 Mitchell Avenue (20 units) and 54 units affordable senior apartments at 1311 Sycamore Avenue (Heritage Place).

Together, all of the above analysis, policies, goals, and objectives identified in the Housing Element prepare the City in meeting the housing needs of current and projected senior population.

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 generation.

Response: The City disagrees partially with the finding. Although the City's Housing Element does not discuss specifically the needs of the aging "baby boomer generation," the City focuses the analysis on seniors in general. Nevertheless, based upon current available data, the City of Tustin Housing Element adequately addresses the needs of the aging population.

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

Response: The City disagrees with the finding. The City of Tustin Housing Element is available online for the public to access. In addition, the Housing Element is also available at City Hall and Tustin Library to allow access for those residents who do not have computers.

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

Response: The City disagrees with the finding. Currently Tustin has a proportionately greater supply of senior housing as compared to other special need groups (i.e. the disabled, female-headed households, large families, extremely low income households), summarized as follows:

- Apartments/Mobile Homes/Ownership Units

<u>Project Name</u>	<u>Total Units</u>
Senior Mobile Homes*	460
Tustin Gardens	100
Heritage Place at Sycamore	54
Tustin Terrace at Mitchell	20
Lennar Senior Housing ¹	240 (153 affordable units)
Enderle Gardens Senior	
Community (Jacaranda Avenue)	62 (CC&Rs restricted one owner to be 55+)
Total	936 units

* Although these mobile home parks are not designated for seniors only, there are a large number of seniors live in mobile home park communities.

- Assisted Living

<u>Project Name</u>	<u>Total Units</u>
Residential Care for the Elderly	24 facilities with 146 beds capacity
Tustin Royale at Bryan Ave. ²	1 facility with 100 beds (85 units)
Silverado Senior Living	1 facility with 42 beds
Total	26 facilities with 288 beds

- Congregate Care/Assisted Living

<u>Project Name</u>	<u>Total Units</u>
Monarch Village (American Senior Living) ³	201 units (Age 62+)

Notes: ¹ Under construction
² Under rehabilitation
³ Entitled – construction plans are being prepared

As demonstrated above, Tustin is rich with senior housing and facilities. While the City agrees that it is important to accommodate the needs for senior housing, the City also has the responsibility to balance its housing stock to accommodate other special needs groups such as large-family, female headed households, extremely-low income households, disabled, homeless, etc. The City however will analyze the needs of senior populations from time to time to ensure adequate housing for various economic segments are available.

To promote senior services, the City devoted \$270,000 of Community Development Block Grant (CDBG) funds for senior center kitchen improvements and approximately \$25,000 annually of CDBG public services funds to provide free meals for seniors.

Recommendations

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: The recommendation has been implemented. Table H-9 of the City of Tustin Housing Element provides a list of assisted affordable housing inventory which include affordable senior housing units. However, the City will

refine the list of Assisted Housing Inventory in the next Housing Element cycle to include cost information.

- R-2 Include sufficient data in the Housing Element to acknowledge the imminent growth in 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: The recommendation has been implemented. As mentioned in Finding F-1, the City's Housing Element includes data of its aging population as they relate to tenure and income (See Table H-7 and Table H-7A). The City will continue to identify current and projected growth trend of its senior population.

- R-3 Put all Housing Elements online on each City's website.**

Response: The recommendation has been implemented. The City of Tustin General Plan along with its Housing Element is currently available online and will continue to be available online, at City Hall, and Library for public access and viewing.

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

Response: The recommendation has implemented. The City has entered into an agreement with Lennar Homes in the creation of 240 senior housing units, 153 of which are affordable senior ownership units. As part of the project's entitlements, the City provided concessions such as density bonus, reduction of development standards, density averaging, parkland credit, etc. This senior housing project is currently under construction.

In addition, the Housing Element identifies capital plan in preserving 100 Units at Tustin Gardens (an existing Senior Project) at risk of conversion to market rate. The City has committed almost \$2.2 million to preserve at-risk affordable units during the Housing Element planning period. In addition, as mentioned in Finding F-1, the City is anticipating a proposal for a senior congregate care facility at Tustin Legacy and will enter into negotiation with developer to facilitate the construction of these types of facilities.