



CITY OF TUSTIN

COMMUNITY
DEVELOPMENT
BLOCK GRANT

DRAFT
2025-2029
CONSOLIDATED
PLAN

&

2025-2026
ACTION PLAN

Submitted to HUD:
August 6, 2025

Table of Contents

Executive Summary.....	1
The Process	7
Needs Assessment	19
Housing Market Analysis.....	52
Strategic Plan	86
Expected Resources	115
Annual Goals and Objectives	119
Affordable Housing	140
Program Specific Requirements.....	153

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2025-2029
CONSOLIDATED
PLAN

EXECUTIVE
SUMMARY



Executive Summary

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

1. Introduction

The 2025–2029 Housing and Community Development Consolidated Plan (Consolidated Plan) for the City of Tustin is the comprehensive five-year planning document identifying the needs and respective resource investments in satisfying the City’s housing, homeless population, non-homeless special needs population, community development, and economic development needs. The Consolidated Plan outlines the City’s intent in using its Community Development Block Grant (CDBG) allocations to offer decent housing, provide a suitable living environment, and expand economic opportunities.

This document—the City of Tustin’s Five-year Consolidated Plan for Fiscal Years 2025-2029 provides the vision, goals, and plan for allocating federal housing and community development funds granted to the City by the U.S. Department of Housing and Urban Development (HUD). HUD block grant funds covered by this plan include:

Community Development Block Grant (CDBG): The Housing and Community Development Act of 1974 created the CDBG Program. The primary objective of the CDBG program is the development of viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities, principally for persons of low- and moderate-income. The CDBG regulations require that each activity meet one of the following national objectives:

- » Benefit low- and moderate-income persons;
- » Aid in the prevention or elimination of slums and blight; or
- » Meet other community development needs having a particular urgency.

The City is an entitlement jurisdiction, meaning it receives federal funds from HUD in proportion to its population size. All funds must assist low- to moderate-income (LMI) individuals and families.

The Consolidated Plan serves the following functions:

- » It is a planning document for the City of Tustin which builds on existing citizen participatory processes;
- » An application for federal funds under HUD’s CDBG formula grants program;
- » A strategy to guide federal funding allocations, programs, policies, priorities; and
- » An allocation of funds to specific projects for the first program year of the Consolidated Plan Cycle (2025-26 one-year Action Plan).

The section of the Consolidated Plan, called the one-year Action Plan, serves as the City’s application to HUD for CDBG program funding. The City must submit an Action Plan annually to receive the entitlement money. The purpose of the Action Plan is to detail how the City will spend its annual allocation of funds to meet community needs identified in the Consolidated Plan.

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

Overview

The City used quantitative data collected via the Needs Assessment and Market Analysis, along with stakeholder consultations and community participation, to identify the priority needs for residents and the strategies that can be used to address those needs.

HUD's Community Planning and Development (CPD) Outcome Performance Measurement Framework classifies objectives in three categories: decent housing, a suitable living environment, and economic opportunity. Based on the Needs Assessment and Market Analysis, the Strategic Plan identifies eight priority needs to be addressed through the implementation of activities aligned with eight Strategic Plan goals.

The eight priority needs for Tustin include support for:

- » Promote Fair Housing
- » Preserve/Increase the Supply of Affordable Housing
- » Support Community Services
- » Enhance Public Facilities and Infrastructure
- » Promote Economic Development
- » Support Efforts to Address Homelessness
- » Neighborhood Revitalization
- » Program Administration/Planning Activities

The eight a Strategic Plan goals include accomplishments such as:

- » Affirmatively further fair housing
- » Expand Affordable Housing Opportunities
- » Provide or Improve Access to Public Social Services
- » Improve and Enhance Public Facilities and Infrastructure
- » Support Businesses and Job Creation/Retention

- » Provide Supportive & Housing Services for Homeless
- » Neighborhood Revitalization
- » Support programs through Program Administration

3. Evaluation of past performance

Consolidated Plan activities must meet one (1) of the three (3) national goals set by HUD for all but administrative activities. The City is responsible for ensuring the Consolidated Plan meets these goals and that its HUD-funded activities carried out under the Consolidated Plan meet its five-year priorities and strategies. The City will measure the effectiveness of its programs through four (4) elements of its performance evaluation system.

1. Five-Year Matrix: This matrix quantifies and summarizes the City's five-year planned accomplishments in relation to the national performance measurement objectives, outcomes, and the City's five-year priorities and strategies.
2. Annual Plan Tables: These tables contain measurable short-term objectives planned for the coming year along with the planned activities, unit of accomplishment, and the number of expected accomplishments upon completion of activities.
3. Integrated Disbursement and Information System (IDIS): This system reports accomplishments and other information to HUD. During the program year, the City will enter its planned and actual accomplishments for each activity into IDIS. At the end of the program year, the City will use IDIS to summarize its accomplishments, enter them into the Five-Year Matrix, and update the Annual Plan tables.
4. Consolidated Annual Performance and Evaluation Report (CAPER): The City will publish the Matrix and Annual Plan Tables in each year's CAPER, which reports its accomplishment to HUD, to reflect its number of planned and actual accomplishments and how they relate to the long- and short-term objectives set in the Consolidated Plan and Annual Action Plan. Such updates will allow HUD, the City's partners, City residents, and others to track the City's performance.

During the previous five-year planning period (2020-2024), the City undertook a range of housing and community development activities to primarily benefit the extremely low-, very low-, low-, and moderate-income residents and those with special needs. For more detailed information, please refer to the recent CAPER available on the City's website at www.tustinca.org/cdbg.

4. Summary of citizen participation process and consultation process

In preparing its Consolidated Plan and Action Plan, the City of Tustin contacted over 100 agencies, groups, and organizations that provide housing and supportive housing services to residents within the City and in Orange County. Significant aspects of the development process included consultations and cooperation between these groups in order to provide the most current information available. To gather additional

input from Tustin residents and businesses, a community survey was released between November – December 2024 which gathered feedback on the priority needs and goals for the CDBG program. There were approximately 100 responses received to the community survey.

Appendix B to this report contains the notices of both public hearings, a notice of public review, and a full list of all agencies contacted during preparation of the Action Plan.

Notification of the first public hearing was published in the Tustin News on February 13, 2025.

The first public hearing was held on February 26, 2025. The purpose of the public hearing was to inform interested citizens about the CDBG program, collect community feedback, and receive input and recommendations from the CPC on the community needs, to be submitted to the City Council for consideration. Participation in this meeting included in-person and virtual participation via webinar. Input from the Citizen Participation Committee included ranking the identified community needs as “high” or “low” and general feedback on program priorities and goals. Public comments during the meeting included support for various community needs such as housing/homeless services, and healthcare services.

The formal public comment period on the complete draft of the ConPlan and Action Plan commenced on March 13, 2025, and concluded on April 14, 2025. Additionally, the notification of the public comment period regarding the draft ConPlan and Action Plan was sent directly to over 100 agencies and organizations as listed in the attached documentation. There were no public comments received during the ConPlan review period.

Notification of the second public hearing was published on April 3, 2025.

The second public hearing, including the adoption of the 2025-2029 Consolidated Plan and 2025-26 Action Plan, is was held on April 15, 2025, at 6:00 p.m. in the City of Tustin Council Chamber located at 300 Centennial Way, Tustin, CA 92780. During this meeting, CDBG-funded non-profits provided written comments expressing support for their programs.

5. Summary of public comments

Public comments from the Citizen Participation Committee on February 26, 2025, public hearing focused on the 2025-2029 Consolidated Plan Draft Goals and Priority Needs. Participation in this meeting included in-person and virtual participation via webinar. Input from the Citizen Participation Committee included ranking the identified community needs as “high” or “low” and general feedback on program priorities and goals. Public comments during the meeting included support for various community needs such as housing/homeless services, and healthcare services.

No comments were received during the formal comment period.

The second public hearing, including the adoption of the 2025-2029 Consolidated Plan and 2025-26 Action Plan, is was held on April 15, 2025, at 6:00 p.m. in the City of Tustin Council Chamber located at 300 Centennial Way, Tustin, CA 92780. During this meeting, CDBG-funded non-profits provided written comments expressing support for their programs.

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

The City accepted all comments provided during the community engagement process.

7. Summary

The Consolidated Plan was developed through a collaborative process to identify community needs with a primary focus on low- and moderate-income persons. The City and its participating agencies strive to find areas for collaboration and alignment to effectively utilize all available funding resources to conduct housing and community development activities that will serve the residents and communities of Tustin. By addressing needs and creating opportunities at the individual and neighborhood levels, the City and the participating agencies hope to improve the quality of life for all residents of the City of Tustin.

DRAFT



2025-2029
CONSOLIDATED
PLAN

THE
PROCESS



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

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

Agency Role	Name	Department/Agency
CDBG Administrator	TUSTIN	Community Development Department

Table 1 – Responsible Agencies

Narrative

The City of Tustin serves as the "Lead Agency," overseeing the development of the Plan. The Community Development Department manages the day-to-day operations of programs designed to achieve the City's goals.

Consolidated Plan Public Contact Information

To comment on Tustin’s Consolidated Plan, please contact:

Janine Hernandez, Senior Management Assistant

Community Development Department

City of Tustin

300 Centennial Way

Tustin, CA 92780

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jhernandez@tustinca.org

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

1. Introduction

HUD mandates that each jurisdiction encourage citizen participation in the development of the Consolidated Plan and subsequent Action Plan. To facilitate this, the City of Tustin established its Citizen Participation Plan in 1995, which was revised in January 2003. The Plan was further amended in 2016 and 2019 to create a Citizen Participation Committee responsible for overseeing the selection of public services funded with CDBG funds. This committee consists of the Chairperson or their designee from the Planning Commission, Community Services Commission, Senior Advisory Board, and Audit Commission, along with three at-large Tustin residents appointed by the City Council. Additionally, the Citizen Participation Plan was updated to change the funding cycle for public service activities, returning to a three-year cycle instead of an annual one.

The Citizen Participation Plan set forth policies and procedures for citizen interaction in planning, implementation, and assessment of the City of Tustin Consolidated Plan/Action Plan. The objectives of the Citizen Participation Plan are:

1. To encourage citizens, particularly residents of low- and moderate-income living in areas eligible for the use of program funds, including minorities, non-English speaking persons, and persons with mobility, visual, or hearing impairments, to participate in the development of the Consolidated Plan/Action Plan.
2. To assure that citizens are furnished with appropriate information about the Consolidated Plan and its various component programs.
3. The City started the Citizen Participation process by publishing a Notice of Funding Availability (NOFA) in the local newspaper seeking Request for Funding Applications for the CDBG funds.

The 2025-26 Action Plan covers programs and projects to be undertaken during the respective year. To develop the City's 2025-26 Action Plan, two public hearings were conducted. The first public hearing was held by the Citizen Participation Committee on February 26, 2025. The purpose of the first hearing was to inform interested citizens about the CDBG program, collect community feedback on CDBG goals and priorities including community needs, and receive input and recommendations from the CPC, to be submitted to the City Council for consideration. Members of the public attended this hearing in an in-person and in a virtual setting. Public comments/input from the Citizen Participation Committee included recommendations and support for the draft goals and priorities.

A second public hearing was held on April 15, 2025, by the City Council. The purpose of the second hearing is for the City Council to review the 2025-2029 Draft Consolidated Plan and 2025-26 Action Plan, including public service and nonpublic service activities, and approve a funding allocation for submission to HUD.

All notices for the above hearings were published in the local newspaper at least 10 days prior to the hearing date and notices were posted at City Hall and at the library. All citizens were encouraged to participate, and those who required special accommodation were accounted for.

The City also, as required by HUD, published a notice of the availability of a draft Consolidated Plan and Action Plan, for public review. The thirty-day public review and comment period began on March 13, 2025, and ended on April 14, 2025.

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)).

The City of Tustin does not own or operate any public housing; however, the City will continue to support and encourage efforts of the Orange County Housing Authority to coordinate private housing resources and social service agencies programs. Additional housing-related efforts by the City of Tustin include conveying two city-owned fourplexes to the Orange County Rescue Mission. These units were remodeled, and they opened in 2016 as the Veteran's Outpost which now provides 26 homeless veterans and their families with housing at the site. During 2018, Habitat for Humanity completed construction on two affordable condominium units, designated to provide affordable housing for veterans and their families. In its efforts to address the needs of homeless families, in February 2021 the Tustin City Council approved a project by Home Aid of Orange County in conjunction with Family Promise of Orange County, to construct a facility with (7) units, including a family resource center, for the purpose of providing short-term transitional housing for families with children who are experiencing homelessness.

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

To address the regional needs of homeless individuals and families, the City of Tustin participates in the Continuum of Care (CoC) program, sponsored by the County of Orange. The goal of the Continuum of Care Homeless Assistance Programs is to fund projects that fill gaps in locally developed systems, helping homeless individuals and families move towards self-sufficiency and permanent housing. A key focus of this effort is funding initiatives that contribute to the Department’s objective of ending chronic homelessness.

The Orange County Continuum of Care system includes six essential components: Advocacy for individuals who are homeless or at risk of homelessness; Outreach, assessment, and prevention services to evaluate the needs of homeless individuals or families; Emergency shelters with supportive services to ensure proper shelter and referrals; Transitional housing to assist individuals and families transitioning to permanent housing and independent living; Permanent housing and supportive housing to address long-term needs; and efforts to reduce chronic homelessness in Orange County, including addressing the housing needs of homeless families and individuals using motels.

The County and Orange County Continuum of Care conducted the 2024 Point-in-Time (PIT) Count during the week of January 22, 2024, as required every two years by the U.S. Department of Housing and Urban Development (HUD). The sheltered count took place on the night of Monday, January 22, 2024, while the unsheltered count was conducted from Tuesday, January 23, 2024, to Thursday, January 25, 2024.

According to the latest available data, approximately 88 unsheltered homeless individuals and 335 sheltered homeless individuals are present in Tustin on any given night. This information will be utilized to ensure that residents have access to fair housing resources and services.

The city is actively engaged in several initiatives to address homelessness, including participation in the Association of California Cities - Orange County's Homelessness Task Force, the United to End Homelessness coalition through the Orange County United Way, and collaboration between the Tustin Police Department, CityNet, the Orange County Health Care Agency (PERT Mental Health Services), Orange County Rescue Mission, and the Tustin-based nonprofit Operation Warm Wishes. These efforts are aimed at providing resources and services to the homeless population in Tustin.

In addition, in March 2019, the City of Tustin opened a new low-barrier temporary homeless shelter with 77 emergency shelter beds for men, women, and families with children. Operated by Temporary Shelter, Inc., the facility offers a range of wraparound and supportive services to assist those in need. This shelter was established to provide unsheltered homeless individuals with ties to Tustin the opportunity to access a bed and shelter.

During the 2024-25 Program Year, Tustin also opened the House of Ruth, which offers seven units of emergency and temporary housing for families who are homeless or at risk of homelessness. The House of Ruth will provide housing navigation services for these families. It is administered by Family Promise of Orange County.

Throughout the 2025-2029 Consolidated Plan cycle, the City of Tustin will continue to support homeless service providers with CDBG funding, ensuring the availability of emergency and transitional shelter resources, along with additional services for homeless and at-risk individuals.

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

As noted above, the City of Tustin participates in the County of Orange's Continuum of Care Program; however, it does not utilize ESG funds.

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	Orange County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Orange County Housing Authority provides affordable housing assistance to Tustin's residents. They were consulted to provide housing data and information for Tustin's report.
2	Agency/Group/Organization	Orange County Continuum of Care
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Employment Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Tustin closely coordinates its homeless services efforts with the Orange County Continuum of Care. This organization provided data which contributed to the report.
3	Agency/Group/Organization	ORANGE COUNTY HEALTH CARE AGENCY
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Services-Health Health Agency

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	OCHCA provides services to the special needs community of Tustin. This agency was consulted to provide information and data on the special needs population within the region and City.
4	Agency/Group/Organization	Southern CA Council of Governments (SCAG)
	Agency/Group/Organization Type	Housing Services - Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	SCAG provided demographic information which contributed to housing-related sections of the report.
5	Agency/Group/Organization	Fair Housing Foundation
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Fair Housing foundation provided information and statistics contributing to the City's report.
6	Agency/Group/Organization	Orange County Rescue Mission
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Orange County Rescue Mission provided information regarding the Village of Hope and veteran's housing and services offered.
7	Agency/Group/Organization	City of Tustin Economic Development Division
	Agency/Group/Organization Type	Housing Services - Housing Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Economic Development Division was consulted regarding Tustin's current housing market and business climate.

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

The City reached out to all relevant organizations and agencies for input on the Consolidated Plan. However, not all contacted organizations/agencies responded. Community-based organizations and public agencies whose work fell outside the scope of the Consolidated Plan, such as those focused on public transit, policing, or crime, were not included in the consultation process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	County of Orange	The City of Tustin's strategies to address homelessness align with the County of Orange's Continuum of Care program with regard to providing emergency shelter services, outreach, transitional, and permanent supportive housing.

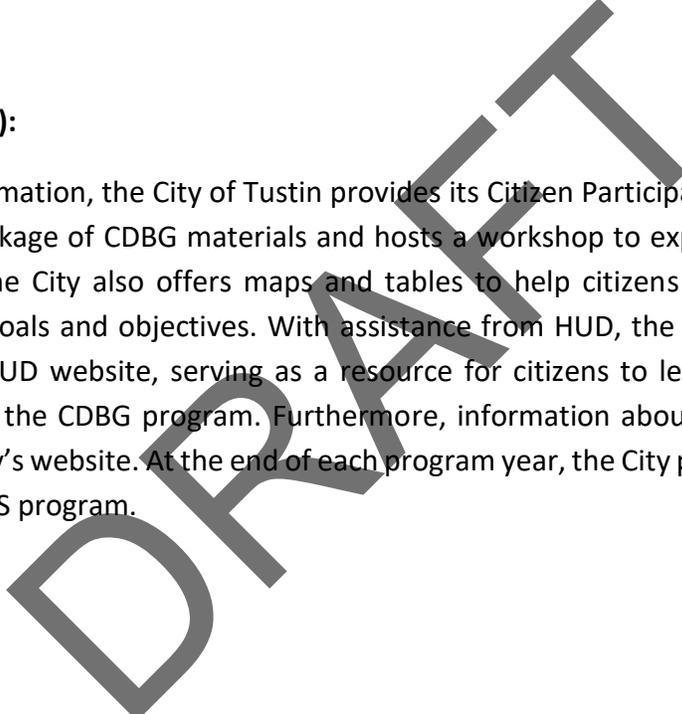
Table 3 – Other local / regional / federal planning efforts

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(l))

Not applicable.

Narrative (optional):

For additional information, the City of Tustin provides its Citizen Participation Committee with a comprehensive package of CDBG materials and hosts a workshop to explain the CDBG process and procedures. The City also offers maps and tables to help citizens better understand the program's overall goals and objectives. With assistance from HUD, the City posts its Executive Summary on the HUD website, serving as a resource for citizens to learn about the types of projects funded by the CDBG program. Furthermore, information about the CDBG program is available on the City's website. At the end of each program year, the City prepares a performance report using the IDIS program.



PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

In preparing its Consolidated Plan, the City of Tustin reached out to over 100 agencies, groups, and organizations that provide housing and supportive housing services to residents within the City and throughout Orange County. Key components of the development process involved consultations and collaboration among these groups to ensure the most up-to-date information was included. A community survey was also designed to gauge the needs and priorities of the Tustin community. The survey received over 100 responses.

The notification for the first citizen participation meeting was published in the Tustin News on February 13, 2025. The public participation meeting for the City’s Consolidated Plan was held on February 26, 2025, at 6:00 p.m. at the City Council Chamber, located at 300 Centennial Way, Tustin, CA 92780.

During the first required public hearing, the Citizen Participation Committee provided feedback on the draft goals and priority needs for the 2025-2029 Consolidated Plan. Input from the Citizen Participation Committee included ranking the identified community needs as “high” or “low” and general feedback on program priorities and goals. Public comments during the meeting included support for various community needs such as housing/homeless services, and healthcare services.

The formal public comment period for the draft Consolidated Plan began on March 13, 2025, and ended on April 14, 2025. Notification of the public comment period was also sent directly to 100 agencies and organizations, as detailed in the attached documentation.

At the close of the public comment period, staff presented the final Consolidated Plan to the Tustin City Council on April 15, 2025, for approval and direction to submit it to HUD.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Direct mailing	All Tustin Residents	The City published a survey and invited participation of residents and stakeholders through multiple marketing approaches.	The City received a total of 105 resident and 14 stakeholder responses. A summary of the survey results is included in the appendix.	All comments and responses were reviewed and used to inform the Consolidated Plan	
2	Newspaper Ad	All Tustin Residents	No responses received.	No comments received.	N/A	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	All Tustin Residents	<p>The City conducted a public hearing on February 26, 2025, to inform interested citizens about the CDBG program, collect community feedback on CDBG goals and priorities, and receive input and recommendations from the CPC on the goals and priorities, to be submitted to the City Council for consideration. The City conducted a public hearing on April 15, 2025, to adoption of the 2025-2029 Consolidated Plan and 2025-26 Action Plan.</p>	<p>During the February 26, 2025, public hearing, the Citizen Participation Committee provided input on the 2025-2029 Consolidated Plan Draft Goals and Priority needs. Their comments generally included support for the draft goals and priorities. During the April 15, 2025, public hearing, the Council approved the the ConPlan/Annual Action Plan.</p>	N/A	

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)
4	Internet Outreach	All Tustin Residents	No responses received.	No comments received.	N/A	www.tustinca.org
5	Direct mailing	Public service agencies, housing, and community organizations	No responses received.	No comments received.	N/A	
6	Direct mailing	All Tustin Residents	No responses received	No comments received.	N/A	

Table 4 – Citizen Participation Outreach

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2025-2029
CONSOLIDATED
PLAN

NEEDS
ASSESSMENT



Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section of the Consolidated Plan outlines the projected housing needs for the City of Tustin for the five-year period beginning July 1, 2025, and ending June 30, 2030. The housing data presented here is based on information pre-determined by the U.S. Department of Housing and Urban Development (HUD) in the Plan template within HUD's Integrated Disbursement & Information System (IDIS). The majority of the data is drawn from the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD. Additionally, where available, updated data from the 2017-2021 and 2018-2022 American Community Survey (ACS) has been incorporated. Further data has been sourced from the 2021 Southern California Association of Governments (SCAG) Regional Housing Needs Assessments (2021 RHNA), and the City of Tustin's Certified 2021-2029 Housing Element.

This section also reflects consultations with social service agencies to address the housing needs of specific populations, including children, the elderly, individuals with disabilities, the homeless, and other groups served by these agencies, as well as input from the citizen participation process.

An analysis of housing needs and related issues, such as substandard housing, overcrowding, and housing cost burden, will be presented in the Housing Needs Assessment section. Additionally, the Disproportionately Greater Need section will examine whether certain racial or ethnic groups experience housing problems at a rate that exceeds 10% compared to the general income group. The Public Housing section, developed in collaboration with the Orange County Housing Authority (OCHA), will summarize the needs of public housing residents. The Homeless Needs Assessment will explore the scope of both unsheltered and sheltered homelessness in Tustin, while the Non-Homeless Special Needs Assessment will focus on individuals requiring supportive housing, such as the elderly and persons with disabilities. Lastly, the Non-Housing Community Development Needs section will discuss the need for public facilities, infrastructure, public improvements, and other public services.

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

Summary of Housing Needs

Affordable housing as a whole, is a critical need throughout the Orange County region, including Tustin. The City of Tustin is committed to preserving existing affordable housing resources while encouraging the development of new affordable housing options. Based on the latest census and American Community Survey (ACS) data, Tustin is classified as a "high-cost housing" area. According to the 2017-2021 ACS Five-Year Estimates, Tustin has 13,165 renter-occupied housing units, which account for 49.6% of all occupied housing units in the City. The ACS data also reveals that approximately 5,520 (41.9%) of these renter households spend more than 30% of their income on rent. In comparison, nearly the same number of owner-occupied units exist (13,395 or 50.4%), with 72.7% of these households paying over 30% of their income toward their mortgage. The ACS shows a higher proportion of cost-burdened households (those spending more than 30% of income on housing) than the HUD's 2016-2020 CHAS data, as shown in Table 5.

Very low-income renters are particularly affected by housing challenges. According to the HUD-provided 2016-2020 CHAS data (Table 4), 73.91% of renter-occupied households earning less than 50% of the Area Median Income (AMI) face one or more housing problems. The National Low Income Housing Coalition's 2023 Housing Wage Calculator shows that, in order to afford the rent for a two-bedroom apartment in Tustin at the fair market rent of \$2,539, workers would need to earn at least \$65 per hour, or \$135,200 annually. By contrast, a household earning 30% AMI (\$44,050 annually) can only afford a rent of \$1,101 per month. To afford a two-bedroom apartment at a fair market rate, it would require 4.1 full-time minimum wage workers.

As of 2020, ACS data shows Tustin's population is approximately 80,800, with about 26,500 households. The Consolidated Plan's online reporting system has compiled data from both the ACS and CHAS, identifying that approximately 50.7% of families in Tustin are extremely low, low, or moderate-income and in need of housing assistance. The data also highlights that renters are more likely than homeowners to experience one or more common housing problems, including lack of complete kitchen facilities, lack of complete plumbing facilities, overcrowding (more than one person per room), and cost burdens exceeding 30% of income.

Several factors will influence the level of demand or "need" for housing in Tustin. The key "needs" categories addressed in the Plan include:

- » Housing needs arising from one or more identified housing problems, such as lacking complete kitchen facilities, lacking complete plumbing facilities, overcrowding (more than one person per room), and a cost burden greater than 30% of income.

- » Housing needs due to severe housing problems, including lack of complete kitchen or plumbing facilities, overcrowding (more than 1.5 persons per room, excluding bathrooms, porches, foyers, halls, or half-rooms), and a cost burden exceeding 50% of income.

- » Housing needs when households are paying more than they can afford for housing.
- » Housing needs caused by overcrowding.
- » Housing needs related to "special needs groups," including the elderly, large families, female-headed households, households with disabled individuals, and the homeless.
- » Housing needs arising from the conversion of assisted housing to market-rate units.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	78,790	80,815	3%
Households	25,340	26,505	5%
Median Income	\$71,897.00	\$88,386.00	23%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,175	3,920	5,345	3,030	10,030
Small Family Households	1,035	1,725	2,470	1,375	5,690
Large Family Households	415	625	590	445	1,010
Household contains at least one person 62-74 years of age	1,324	865	940	490	2,170
Household contains at least one person age 75 or older	830	400	335	240	600
Households with one or more children 6 years old or younger	525	755	1,050	614	1,115

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

Table 2 reflects the number and type of households by HUD Adjusted Median Family Income (HAMFI).

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	65	55	75	65	260	4	10	0	0	14
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	215	145	225	50	635	10	25	25	0	60
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	385	460	440	145	1,430	0	25	65	10	100
Housing cost burden greater than 50% of income (and none of the above problems)	2,040	880	160	0	3,080	400	470	185	150	1,205

	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
Housing cost burden greater than 30% of income (and none of the above problems)	255	870	1,390	470	2,985	190	245	700	360	1,495
Zero/negative Income (and none of the above problems)	90	0	0	0	90	80	0	0	0	80

Table 7 – Housing Problems Table

Data 2016-2020 CHAS
Source:

Table 3 provides the number of households with housing problems by tenancy and HAMFI.

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 four housing problems	2,710	1,540	905	265	5,420	420	530	275	160	1,385
Having none of four housing problems	485	1,015	2,520	1,355	5,375	560	840	1,645	1,255	4,300
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
Source:

Table 4 provides the number of households with no housing problems, one or more housing problems, and negative income by tenancy and HAMFI.

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	740	1,220	880	2,840	155	200	250	605
Large Related	375	415	95	885	10	30	115	155
Elderly	1,220	215	205	1,640	375	345	245	965
Other	540	420	610	1,570	70	140	290	500
Total need by income	2,875	2,270	1,790	6,935	610	715	900	2,225

Table 9 – Cost Burden > 30%

Data Source: 2016-2020 CHAS

Table 5 shows the number of households with a housing cost burden of more than 30%, broken down by household type, tenancy, and household income, expressed as a percentage of Area Median Income (AMI). The data indicates that 6,935 renter-occupied households (26.2% of all households) and 2,225 owner-occupied households (8.4% of all households) spend over 30% of their income on housing costs.

HUD defines small, related households as those with two to four related members, while large, related households are those with five or more related members. An elderly household is defined by HUD as a household where the head, spouse, or sole member is at least 62 years of age.

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	0	0	615	615	110	135	0	245
Large Related	0	0	50	50	0	20	20	40
Elderly	1,035	85	70	1,190	240	215	80	535
Other	0	505	265	770	60	0	0	60
Total need by income	1,035	590	1,000	2,625	410	370	100	880

Table 10 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

Table 6 provides the number of households with a housing cost burden of more than 50% by household type, tenancy, and household income expressed as a percentage of AMI. Data in Table 6 indicates that 2,625 renter-occupied households (9.9% of total households), and 880 owner-occupied households (3.32% of total households) pay more than 50% of the income towards housing costs.

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	560	495	480	185	1,720	10	50	50	0	110
Multiple, unrelated family households	55	120	175	35	385	0	0	40	10	50
Other, non-family households	20	0	15	0	35	0	0	0	0	0
Total need by income	635	615	670	220	2,140	10	50	90	10	160

Table 11 – Crowding Information – 1/2

Data Source: 2016-2020 CHAS

Table 7 provides the number of households that are overcrowded which is defined as households with more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms. The data is displayed by household type, tenancy, and household income expressed as AMI.

	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	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source: Comments: Data not available on renter/owner or income status.

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

According to the U.S. Census Bureau, nonfamily households include individuals who live alone or share their residence with unrelated people. Based on the 2018-2022 American Community Survey Five-Year Estimates (Table S1101 - Households and Families), the City of Tustin has 7,188 nonfamily households,

which represents 21.7% of all households in the city. The at-risk single-person population in need of housing assistance includes seniors, homeless individuals, people living in poverty, those with HIV/AIDS, survivors of domestic violence, individuals with disabilities or mental illness, those facing foreclosure, and people who have recently lost their jobs.

As the ACS data indicates, nearly 20% of all Tustin households consist of individuals living alone. Additionally, 73.4% of nonfamily households are single-person households, with 25.3% of these individuals aged 65 or older. The data from ACS Table B19201 (shown in Exhibit 2 - NA-10) reveals that nearly 21% of nonfamily households live in poverty, while almost 50% of nonfamily households are low-income, earning less than 80% of the Area Median Income (AMI).

Exhibit 1 – NA-10 – Housing Needs Assessment (Nonfamily Households/Female-Headed Households) provides further details from ACS Table S1101 regarding the information mentioned in the narrative.

Exhibit 2 – NA-10 – Housing Needs Assessment (Income and Poverty Levels) provides additional details from ACS Table B19201 regarding the income and poverty data referenced in the narrative.

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.

According to ACS Table S1810 – Disability Characteristics from the 2018-2022 American Community Survey Five-Year Estimates, the estimated population in the City of Tustin with a disability is 5,827, or 7.3% of the total population. The largest group of individuals with disabilities are those aged 75 and over, comprising 1,920 people, or 45.3% of this age group. Additionally, there are 3,290 individuals in Tustin between the ages of 18 and 65 who report having a disability. Physical and developmental disabilities can limit access to housing units designed for traditional layouts and may also restrict the ability to earn sufficient income. Special housing needs for individuals with disabilities include wheelchair accessibility, handrails, and custom construction for interior living spaces.

Although specific data for Tustin is unavailable, the 2024 Orange County Homeless Census and Survey indicates that the County has approximately 674 individuals who are homeless and have experienced domestic violence, 2,044 individuals with a physical disability, and 715 individuals with a developmental disability, all of whom may require housing assistance.

What are the most common housing problems?

The most prevalent housing issue in Tustin is the cost burden of owning or renting a home. According to HUD standards, families who spend more than 30% of their gross income on housing are considered cost burdened. As detailed in Tables 5 and 6, 2,225 owner-occupied households (8.4% of all households) pay more than 30% of their income toward housing costs, and 880 owner-occupied households (3.32% of all households) pay more than 50% of their income toward housing costs, which represents 47.78% of all households in Tustin. Homeowners with incomes between 51-80% of AMI (900 households) are most impacted by the 30% cost burden, accounting for 40.45% of those paying more than 30% of their income

on housing. Additionally, homeowners with incomes between 0-30% of AMI experience the highest cost burden, with 46.6% of those paying more than 50% of their income on housing falling into this income category.

Renter-occupied households face similar cost burdens. A total of 6,935 renter-occupied households (26.2% of all households) spend more than 30% of their income on housing, and 2,625 renter-occupied households (9.9% of all households) pay more than 50% of their income on housing expenses, which represents 36.1% of Tustin's total households. Renters with incomes below 30% AMI (1,035 households) and those with incomes between 50-80% AMI (1,000 households) are most affected, with 77.52% of cost-burdened renters in these income categories spending more than 50% of their income on housing.

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

As shown in Table 5, small, related renter households make up the largest group of individuals facing cost burdens in both the >30% and >50% cost burden categories. A total of 3,455 small, related renter households are experiencing cost burdens, representing 27.28% of all cost-burdened households. The next largest group is elderly renters, with 2,830 elderly renter households facing cost burdens, accounting for 22.35% of all cost-burdened 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

According to Table 2, which presents data from the 2016-2020 CHAS, 15,380 households in Tustin, or 58.03% of all households, have children. Of these, the majority (12,295 households, or 79.94%) are small families. Among families with children, 44.6% are low-income, and 9.43% are extremely low-income. While most low-income households are currently housed, they face a precarious situation, especially those who are overpaying for housing amid the current market conditions, putting them at risk of homelessness.

Although there is no specific data available for transitional housing in Tustin, the 2024 Point in Time (PIT) Count reports that 3,149 individuals, or 43.01% of the homeless population in Orange County, are sheltered through transitional housing, rapid re-housing, or similar programs. In Tustin, transitional housing services are provided by Families Forward, Human Options, and the Orange County Rescue Mission-Village of Hope. Families nearing the end of their assistance at the Village of Hope may require affordable housing, childcare, or additional supportive services for families and children. The City of Tustin addresses these needs through the Orange County Housing Authority, specialized programming for youth and children, and referral services provided by the Tustin Family Youth Center and Kids Corner Preschool.

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:

The City of Tustin does not collect specific data on the number of at-risk individuals within the City; however, it acknowledges that various factors can define the at-risk population. These factors include, but are not limited to, housing instability caused by economic hardship, domestic violence, and being a female-headed household. The City is committed to supporting the at-risk population by providing services through existing City programs, as well as offering CDBG funding to public service agencies that assist these individuals.

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

The lack of affordable housing for lower-income households is closely linked to housing instability and an increased risk of homelessness. Both owner-occupied and renter-occupied households facing cost burdens—spending more than 30% and 50% of their income on housing—are vulnerable to instability and homelessness.

Other factors contributing to housing instability and homelessness risk include prolonged unemployment, foreclosure, mental illness, domestic violence, substance abuse (drugs and/or alcohol), unexpected medical expenses, disabilities, and the transition from institutions such as jail, mental health facilities, or skilled nursing care centers. Emergency or unforeseen expenses can also lead to housing instability.

The City of Tustin collaborates with various programs and agencies to address these issues and reduce the risk of instability. Tustin participates in the County of Orange’s Continuum of Care process and the Association of California Cities – Orange County’s Homelessness Task Force, which helps the City stay informed about regional homeless shelter and service needs. Additionally, through its partnership with the Orange County Housing Authority (OCHA), Tustin renters have access to OCHA’s Family Self-Sufficiency Program. This program prioritizes families with children who are homeless or at risk of homelessness (those paying over 50% of their household income in rent). Beyond housing assistance, the program offers support services, including job training and employment opportunities, to help participants achieve economic independence.

Discussion

Housing challenges continue to impact residents of Tustin, with the most significant issue being the high cost of housing. To address this, the City of Tustin collaborates with the Orange County Housing Authority, private developers, nonprofit developers, agencies like Neighborhood Partnership Housing Services, and other government entities such as the State of California Department of Housing and Community Development. These partnerships work to provide resources that help make housing more affordable. The City is also proactive in seeking funding opportunities to develop additional affordable rental housing.

Furthermore, Tustin has a certified 2021–2029 Housing Element and has taken specific actions to align with the goals outlined in the certified Housing Element. These efforts include rezoning and various City Code Amendments aimed at increasing affordable housing opportunities and meeting the City’s obligations under the Regional Housing Needs Assessment (RHNA).

However, limited funding for these activities makes the development of affordable housing challenging. With the changing landscape of available funds, the City is constantly exploring new partnerships with public and private sector agencies to find innovative solutions to affordable housing development.

The City of Tustin is committed to addressing the housing needs of extremely low, very low-, and low-income families. The strategic plan and goals in this five-year Consolidated Plan are designed to meet these needs. The goals for this cycle include addressing homelessness, providing supportive services, and offering housing assistance. Additionally, families in need of further supportive services will be assisted through public service goals, such as youth programs, senior programs, healthcare services, veterans' services, and homelessness prevention.

DRAFT

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

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

Introduction – N/A

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
Jurisdiction as a whole	3,575	600	0
White	895	265	0
Black / African American	70	15	0
Asian	960	145	0
American Indian, Alaska Native	0	0	0
Pacific Islander	45	0	0
Hispanic	1,565	175	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*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
Jurisdiction as a whole	3,180	740	0
White	875	430	0
Black / African American	165	0	0
Asian	380	110	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,720	185	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*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
Jurisdiction as a whole	3,270	2,075	0
White	1,055	895	0
Black / African American	74	25	0
Asian	610	380	0
American Indian, Alaska Native	25	10	0
Pacific Islander	4	0	0
Hispanic	1,330	680	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*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
Jurisdiction as a whole	1,245	1,775	0
White	480	670	0
Black / African American	50	74	0
Asian	265	525	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	435	475	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*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%

Discussion

N/A

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

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

Introduction

N/A

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
Jurisdiction as a whole	3,130	1,045	0
White	700	460	0
Black / African American	70	15	0
Asian	895	210	0
American Indian, Alaska Native	0	0	0
Pacific Islander	45	0	0
Hispanic	1,385	365	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 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
Jurisdiction as a whole	2,070	1,855	0

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
White	610	700	0
Black / African American	50	115	0
Asian	285	205	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,105	800	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*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
Jurisdiction as a whole	1,180	4,165	0
White	295	1,655	0
Black / African American	69	30	0
Asian	215	770	0
American Indian, Alaska Native	0	35	0
Pacific Islander	4	0	0
Hispanic	570	1,435	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*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
Jurisdiction as a whole	425	2,610	0
White	114	1,035	0
Black / African American	0	125	0
Asian	120	675	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	185	725	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*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

N/A

DRAFT

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

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

Introduction:

N/A

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	15,390	5,885	5,050	175
White	6,450	2,080	1,585	55
Black / African American	215	185	110	15
Asian	4,605	1,065	1,245	50
American Indian, Alaska Native	10	35	0	0
Pacific Islander	4	0	45	0
Hispanic	3,795	2,320	1,985	60

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion:

N/A

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?

N/A

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

N/A

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

N/A

DRAFT

NA-35 Public Housing – 91.205(b)

Introduction

The City of Tustin does not own or manage any public housing projects. However, the City remains committed to supporting and encouraging the efforts of the Orange County Housing Authority in facilitating coordination between private housing providers and social service agencies. Currently, 117 families, 59 individuals with disabilities, and 169 elderly residents are receiving Section 8 voucher assistance, while 77 Tustin veterans are benefiting from Veterans Affairs Supportive Housing (VASH) assistance through the Orange County Housing Authority.

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	10,825	0	10,418	187	207	10

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)

Table Definition

Voucher numbers are reflective of Countywide data.

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	16,476	0	16,470	17,239	15,594
Average length of stay	0	0	0	8	0	8	0	4
Average Household size	0	0	0	2	0	2	1	3
# Homeless at admission	0	0	0	87	0	5	72	10
# of Elderly Program Participants (>62)	0	0	0	4,926	0	4,884	38	3
# of Disabled Families	0	0	0	2,163	0	2,075	64	14
# of Families requesting accessibility features	0	0	0	10,825	0	10,418	187	207
# 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 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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	5,857	0	5,528	139	182	6
Black/African American	0	0	0	745	0	693	39	10	2
Asian	0	0	0	4,128	0	4,107	4	15	2
American Indian/Alaska Native	0	0	0	64	0	60	4	0	0
Pacific Islander	0	0	0	31	0	30	1	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 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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	1,941	0	1,814	34	87	4
Not Hispanic	0	0	0	8,884	0	8,604	153	120	6

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

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The City of Tustin does not have public housing tenants.

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

Not applicable.

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

Not applicable.

Discussion

No further discussion on Public Housing is needed.

DRAFT

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

To address the regional needs of homeless individuals and families, the City of Tustin actively participates in the Continuum of Care (CoC) program, sponsored by the County of Orange. The goal of the Continuum of Care Homeless Assistance Programs is to fund projects that fill gaps in locally developed systems, helping homeless individuals transition to self-sufficiency and permanent housing. The key objective of these efforts is to fund projects aligned with the Department's mission to end chronic homelessness.

Orange County's Point-in-Time (PIT) Count, known as Everyone Counts OC, plays a crucial role in establishing a baseline for the County's efforts in building a comprehensive, responsive System of Care for individuals and families experiencing homelessness. The 2024 PIT Count, conducted by the County and the Orange County Continuum of Care, took place during the week of January 22, 2024, as required by the U.S. Department of Housing and Urban Development (HUD) every two years. The sheltered count occurred on the night of January 22, 2024, while the unsheltered count took place from January 23 through 25, 2024.

The County's 2024 PIT Count follows HUD guidelines, collecting key data on chronic homelessness, disabling conditions, demographics, and specific subpopulations. The methodology used for the unsheltered count remains consistent with previous PIT Counts in 2019 and 2022, allowing for comparisons across the three counts. Volunteers canvassed the entire county using ArcGIS maps and a mobile survey application to identify people experiencing unsheltered homelessness. The survey, which includes HUD-required questions as well as additional demographics, helps the County gain a deeper understanding of homelessness in Orange County.

According to the most recent data from the Point-in-Time (PIT) Count, 423 homeless individuals were identified in Tustin, with 88 (20.8%) being unsheltered and 335 (79.2%) sheltered. While the 2024 PIT Count has limited data for Tustin, it provides data for broader subareas, including the Central Service Planning Area, of which Tustin is a part. Table 21 outlines the 2024 PIT Count data for both the entire County and the Central Service Planning Area, where applicable.

This data will be used to ensure residents have access to fair housing resources and services. The City is also involved in additional efforts to combat homelessness, including its participation in the Association of California Cities - Orange County's Homelessness Task Force and the United to End Homelessness coalition through Orange County United Way. Additionally, the City collaborates with the Tustin Police Department, CityNet, the Orange County Health Care Agency (PERT Mental Health Services), the Orange County Rescue Mission, and the Tustin-based nonprofit Operation Warm Wishes to provide essential resources and services to the transient homeless population in Tustin.

The City of Tustin provides support to various special-needs groups, including the elderly and frail elderly, through its Senior Center. The Center offers a wide range of services such as transportation, case management, information and referrals, a shared housing program, senior activities, health and fitness programs, and other recreational activities to help meet the needs of this population.

Additionally, the City allocates CDBG funds to Meals on Wheels Orange County, which provides meal services to homebound elderly individuals, ensuring they receive proper nutrition and support. The City also continues to refer individuals with special needs—such as those with disabilities (mental, physical, and developmental), alcohol or drug dependencies, and those with HIV/AIDS—to appropriate agencies for specialized care and assistance.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	180	948	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	3,993	2,195	0	0	0	0
Chronically Homeless Individuals	1,566	877	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	248	80	0	0	0	0
Unaccompanied Child	0	6	0	0	0	0
Persons with HIV	92	175	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: Data used from 2024 Point in Time Count for Orange County - City of Tustin Data. A "0" count indicates that data was not available for this category.

Indicate if the homeless population Has No Rural Homeless
is:

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):

Data from the 2024 Orange County Point-in-Time Count (Table 21) reveals that the highest number of unsheltered homeless individuals are adults, with 3,993 unsheltered, while the highest number of sheltered individuals are also adults, with 2,195 provided shelter. Although there is no specific data for unaccompanied youth in the City of Tustin, six transitional-aged youth were sheltered. The table does not include data on the homeless senior population in Tustin, but countywide, there are 222 unsheltered seniors and 288 sheltered seniors.

Regarding chronic homelessness, the Point-in-Time Count does not provide specific numbers for chronic homelessness within each Service Planning Area or city. However, countywide, the report indicates that 38.44% of unsheltered adult homeless individuals and 34.30% of sheltered adult homeless individuals are considered chronically homeless.

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Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	1,088	1,313
Black or African American	212	150
Asian	72	84
American Indian or Alaska Native	61	40
Pacific Islander	17	23
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	612	607
Not Hispanic	893	1,220

Data Source

Comments:

Data used from 2019 Point in Time Count for Orange County - Central Service Planning Area Data

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

Data from the 2024 Point-in-Time Count specific to the City of Tustin shows that there are 335 sheltered families and 88 unsheltered families. The City of Tustin collaborates with the Tustin Police Department, CityNet, the Orange County Health Care Agency (PERT Mental Health Services), the Orange County Rescue Mission, and the Tustin-based nonprofit Operation Warm Wishes to provide resources and services to homeless families in Tustin.

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

According to the 2024 Point in Time Count for the Orange County Central Service Planning Area, the White race/ethnicity represents the largest percentage of both unsheltered and sheltered homeless individuals, accounting for approximately 42.46% in each category. The Native Hawaiian or Other Pacific Islander group comprises the smallest percentage of both unsheltered and sheltered homeless, making up 1% of the population in each category.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2024 Point in Time Count for the Orange County Central Service Planning Area recorded a total of 3,454 homeless individuals, with 2,036 (58.95%) being unsheltered and 1,418 (41.05%) being sheltered. In comparison, the City of Tustin had a total of 423 homeless individuals, with 88 (20.8%) unsheltered and 335 (79.2%) sheltered. This data shows that a higher percentage of Tustin's homeless population is sheltered compared to the Central Service Planning Area overall.

Discussion:

The City of Tustin acknowledges that homelessness is a regional issue that requires a collective approach from all jurisdictions, regardless of individual circumstances. As part of its efforts to address homelessness, the City highlights the Homeless Accommodation Plan, established for the Tustin Legacy Specific Plan area (formerly the MCAS Tustin Specific Plan area). This plan provides essential supportive housing and services to help homeless individuals and families transition from homelessness to greater self-sufficiency. The plan includes 387 beds at the Village of Hope facility, an increase of 195 beds, which supports the goal of moving homeless individuals and families to permanent housing within 24 months. The facility also offers supportive services designed to address the unique needs of homeless persons.

Additional homeless service providers operating in the Tustin Legacy Specific Plan area include the Orange County Social Services Tustin Family Campus, Salvation Army, Orange Coast Interfaith, Families Forward, Human Options, and Temporary Shelter, Inc.

In addition, during the 2025-2029 Consolidated Plan Cycle, the City will continue to operate a newly opened low-barrier temporary homeless shelter, which provides 77 emergency shelter beds for men, women, and families with children. This facility, operated by Temporary Shelter, Inc., includes a variety of wrap-around and supportive services to assist individuals and families in need. The shelter is designed to ensure that unsheltered individuals with ties to Tustin have access to a safe and supportive environment.

The City of Tustin, in partnership with the Orange County Rescue Mission, has also executed a ground lease for the construction/rehabilitation of a 5.1-acre site to establish a 192-unit emergency and transitional housing project at the Tustin Legacy Specific Plan area. This project repurposes former military barracks, now equipped with private bathrooms and kitchenettes. Additionally, the Village of Hope has expanded its transitional housing capacity to 387 units, an increase of 195 units, and is currently operational.

Further efforts to expand transitional housing in Tustin are demonstrated by the recent opening of the "House of Ruth" project. In partnership with Home Aid Orange County and Family Promise of Orange County, this project includes a new seven-unit facility and family resource center aimed at providing housing and support services to families with children who are experiencing homelessness or at risk of homelessness.

To address both emergency shelter and transitional housing needs, the City will continue to prioritize allocating CDBG funds to homeless service agencies. Furthermore, the City will maintain its involvement in the County of Orange's Continuum of Care program, which provides supportive services and housing for the homeless and at-risk populations. The City will also continue its strategy of referring homeless individuals and families to appropriate service agencies and organizations and will continue to support these agencies through financial contributions for shelter and other services for the homeless.

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

Introduction:

Certain segments of the population may face greater challenges in finding decent and affordable housing due to unique circumstances and may require specific accommodation or assistance to meet their housing needs. Special needs groups include the elderly, individuals with disabilities (including those with developmental disabilities), female-headed households, and large families. The City of Tustin acknowledges the needs of these populations and has established goals and priorities to address them effectively.

Describe the characteristics of special needs populations in your community:

The special needs of many elderly household's stem from their lower, fixed incomes, physical disabilities, and the need for assistance. According to 2022 ACS data, 15.14% of the City of Tustin's population is aged 65 or older, which may require specific accommodations or assistance to meet their housing needs.

Physical and developmental disabilities can limit access to housing units designed in traditional ways and may also affect the ability to earn sufficient income. As per 2022 ACS data, 8.75% of Tustin residents between 18 and 65 years old reported having a disability. Additionally, about 31.28% of Tustin residents over 65 years old reported a disability. The U.S. Census Bureau does not collect specific data on individuals with developmental disabilities.

Female-headed households often experience lower incomes and face special needs, which limits housing availability for this group. According to 2023 ACS data, there are 1,229 female-headed households in Tustin with children under the age of 18.

According to Census Bureau guidelines, a family household with five or more persons is considered a large family. In Tustin, 3,852 households (approximately 15% of the city's families) fall into this category, based on 2023 ACS data.

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

The special housing needs of the elderly are a significant concern for the City of Tustin. Many retired individuals are on fixed, low incomes, which puts them at greater risk of housing overpayment. Additionally, the elderly often have specific needs related to housing construction and location. To enhance accessibility and mobility, elderly individuals may require modifications such as ramps, handrails, and lower cupboards and counters. In terms of location, due to limited mobility, they also need easy access to public facilities, such as medical services, shopping areas, and public transit.

For persons with disabilities, access and affordability are the two primary housing concerns. Access is particularly critical for those who are physically disabled, as they often need specially designed housing

that includes features like lowered countertops, wider doorways, and modified bathrooms, as well as accessible paths to and from the property. A significant challenge for many individuals in this demographic is that they are often on fixed, lower incomes and may depend on federal or state aid, further complicating their ability to secure affordable housing.

Female-headed households with children primarily face affordability challenges, as they tend to have lower-than-average incomes. These households also have a significant need for affordable childcare. As a result, finding suitable housing near essential services, schools, and public transportation becomes difficult due to financial constraints.

Large family households require special consideration because they typically need larger homes with enough bedrooms to prevent overcrowding. However, there is a limited availability of 3+ bedroom apartment units in Tustin to meet the needs of large families. Additionally, households with five or more members are more likely to be below the national poverty level, which makes it challenging to find adequate housing. Renters face even more difficulty since multifamily rental units tend to be smaller than single-family homes. As a result, large families often experience both overcrowding and affordability issues disproportionately.

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

The City of Tustin does not have a large population of residents living with HIV/AIDS (Persons Living with HIV (PLWH)); however, the Orange County Health Care Agency (OCHCA) oversees support for individuals in Tustin who may be affected by HIV/AIDS. The OCHCA has released its 2022-2026 Integrated HIV Prevention and Care Plan, which outlines the current state of HIV services in the county and sets goals and strategies for addressing the epidemic moving forward. This plan focuses on the HIV Care Continuum, particularly for those at high risk of contracting HIV, and aligns with the objectives outlined in the National HIV/AIDS Strategy for 2022-2025. The key goals of the plan are: 1) to reduce new HIV infections; 2) to increase access to care and improve health outcomes for people living with HIV; and 3) to reduce HIV-related disparities and health inequities. According to the report, in 2021, there were 6,770 individuals diagnosed with HIV, including 274 new cases across the county. Demographic data for the newly diagnosed cases is presented on the following page.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Not applicable. The City does not receive HOME funds.

Discussion:

The City of Tustin is committed to addressing the needs of its non-homeless special needs population. The City enhances coordination with the public and assisted housing providers, as well as private and governmental health, mental health, and service agencies. This is accomplished through developing strong working relationships with these organizations, gathering input through public participation processes, and seeking professional advice and recommendations.

The City also collaborates with County and State offices by making necessary referrals, particularly for housing in residential care facilities with six or fewer residents, in compliance with State regulations. Additionally, the City keeps an up-to-date listing of the County and State's licensed facilities that offer supportive housing, regularly receiving updates from the State's Community Care Licensing - Residential Division Office in Santa Ana. Referrals are also made to the Orange County Public Housing Authority for low-income individuals with special needs who seek affordable housing options.

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

Describe the jurisdiction’s need for Public Facilities:

The City of Tustin's priority needs related to public facilities includes:

New Parks & Park Improvements:

The 2025-2029 Consolidated Plan cycle encourages prioritizing construction of new park facilities and improvements to existing parks, benefiting all Tustin residents Citywide. Tustin's parks are widely used by youth for sports and recreational activities, making it a priority to ensure these facilities are safe and well-maintained. Additionally, there is a focus on adding new park amenities to address the increasing demand due to the development of residential communities in the Tustin Legacy Area. It is important to note that CDBG funding will only be allocated for facilities and improvements within the CDBG Low/Moderate Income Census Tract Target Area (Appendix C).

General Public Facilities Needs:

The plan includes prioritizing various public facility improvement needs across Tustin, such as street repairs, sidewalk repairs, storm drain upgrades, public facility enhancements, lighting improvements, and more. Similar to park improvements, CDBG funding will be exclusively used for public facility upgrades within the CDBG Low/Moderate Income Census Tract Target Area.

How were these needs determined?

The target area for the CDBG program is severely limited in its park and recreation resources available to area youth desiring to participate in constructive, organized activities.

The City of Tustin's Public Facilities needs were determined based on feedback from the community and consultations with City Staff.

Describe the jurisdiction’s need for Public Improvements:

The City of Tustin's priority needs related to public improvements includes:

Water/Sewer Improvements

Water and sewer improvements have been identified part of the general Public Facilities Needs for the City. Infrastructure, such as water wells, are in need of rehabilitation and improvements.

Street/Sidewalk Improvements

The City identified street and sidewalk improvements as a public facilities priority with relation to facilities in need of repair within the CDBG Low/Moderate Income Target Area.

How were these needs determined?

The majority of the street and sidewalk improvements as well as other types of infrastructure in the target area were constructed more than 30 years ago. Also, some areas were never developed with sidewalks. These facilities have reached the age where they are beginning to deteriorate more rapidly and require reconstruction.

The City of Tustin's public improvements needs were determined based on feedback from the community and consultations with City Staff.

Describe the jurisdiction's need for Public Services:

The City of Tustin places a high priority on many public services needs. Priorities which have been set, which address public services including:

Youth Services

This priority involves providing Tustin youth with services such as after-school programs and healthcare services. The City intends to allocate CDBG funding to assist Low/Moderate Income Tustin families to receive such services.

Senior Services

Includes senior services and programming provided through the City's full-service Senior Center located in Old Town Tustin, and provision of additional healthcare services or other resources to promote the wellness of Tustin's senior population. Additional services funded by CDBG as a public service activity include a lunch cafe program provided at the Senior Center as well as home-delivered meals provided to homebound Tustin seniors.

Anti-Crime Programs

Anti-crime programs include crime awareness/education, and other anti-crime programs, workshops, trainings, and events for residents within the community. Although crime awareness is a high priority citywide, the CDBG Low/Moderate Income Census Tract Target Area is a specific area of focus for crime prevention activities given the increasing population density and increasing need for police services. The population is a potential target for crime which could be prevented through the implementation of crime awareness programs.

Homeless Needs and Supportive Services

Addressing the needs of the homeless includes providing transitional and emergency housing and allocating CDBG funds to public service agencies who provide additional supportive services to the at-risk and veteran homeless population.

General Public Service Needs

General public service needs include services to Tustin youth, seniors, low/moderate income Tustin residents, and the homeless population. These services may include after-school programming, congregate or home-delivered meals, emergency and transitional housing, and low-cost healthcare services. A core provision of the CDBG program is to provide public services to the Tustin community. Improving access to these services is a high priority for the City of Tustin

How were these needs determined?

The City of Tustin's public service needs were determined based on feedback from the community, non-profit organizations, and consultations with City Staff.

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2025-2029
CONSOLIDATED
PLAN

HOUSING
MARKET
ANALYSIS



Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Market Analysis section of the Consolidated Plan offers a comprehensive overview of the housing market conditions in the City of Tustin. It includes an inventory of facilities and services for homeless individuals and special needs populations, identifies barriers to affordable housing, and examines the additional needs of the community based on geographic and regional factors.

The City of Tustin is dedicated to providing a broad spectrum of housing options that cater to the diverse needs of its residents and future workforce. By promoting a sufficient supply and variety of housing, the City aims to address evolving housing demands, support economic growth, and foster an inclusive community.

The City of Tustin adheres to the following housing principles:

- » A diverse range of housing options for all income levels is fundamental to creating a complete and thriving community.
- » The City's housing stock should meet the needs of both current and future residents and the workforce, including those with special needs.
- » The preservation, maintenance, and enhancement of distinct neighborhoods and housing contributes to property value stability and enhances the overall livability of the area.
- » Affordable, high-quality housing is key to attracting and retaining a skilled workforce and fostering a prosperous local economy.

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

Introduction

The City of Tustin assessed various factors of the community's housing stock to gain a comprehensive understanding of the available housing supply. This section will cover the supply, occupancy, condition, and other attributes of the current housing stock, along with plans for future housing development.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	10,180	37%
1-unit, attached structure	4,040	15%
2-4 units	2,975	11%
5-19 units	4,000	14%
20 or more units	5,750	21%
Mobile Home, boat, RV, van, etc	850	3%
Total	27,795	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

As shown in Table 1, Tustin has a total of 26,945 housing units, excluding mobile homes, boats, RVs, and vans. The largest portion of the City's housing stock consists of 10,180 single-unit detached structures, making up 37% of the total housing stock. Single-unit attached structures account for 4,040 units, or 15% of the housing stock. Two- to four-unit structures make up 2,975 units, approximately 11% of the total. Buildings with 5-19 units comprise 4,000 units, or 14%, while structures with 20 or more units account for 5,750 units, or 21% of the housing stock. Mobile homes, boats, RVs, vans, and similar units represent the smallest share, with 864 units, or 3%, of the total housing stock in Tustin.

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	50	0%	950	7%
1 bedroom	360	3%	3,855	29%
2 bedrooms	2,680	20%	5,765	43%
3 or more bedrooms	10,090	77%	2,745	21%
Total	13,180	100%	13,315	100%

Table 28 – Unit Size by Tenure

Data Source: 2016-2020 ACS

Table 2 presents a breakdown of housing unit sizes in the City of Tustin by tenure (owner-occupied vs. renter-occupied). It reveals that nearly 48% of Tustin's total housing units have three or more bedrooms, while 31.87% are one-bedroom units. Efficiency units account for just under 4%, or approximately 1,000 units. Owner-occupied units generally feature the highest proportion of three-bedroom units, whereas renter-occupied units are more commonly two-bedroom units.

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The City of Tustin provides housing assistance to extremely low, very low, and low-income single individuals and families. According to the City's AB 987 data, 124 families are currently receiving support through low-income housing funds. As of December 31, 2023, there are 279 units that contribute to inclusionary or replacement housing requirements. Additionally, Tustin offers 1,528 rental units for very low- and low-income residents, and 5,715 units are available for moderate-income households.

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

During the 2021-2029 Housing Element planning cycle, three (3) projects have been identified as at risk of expiring: Chatham Village (12/31/2027), Westchester Park (10/1/2029), and Flanders Pointe (12/31/2029). The Housing Authority will continue to monitor these units. Tustin Gardens has a Section 8 contract for ninety-nine (99) units that is extended on an annual basis. The contract was due to expire on July 31, 2022; however, the contract has been extended for a new 20-year period with an expiration date of July 31, 2041.

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

While data from the American Community Survey and other sources provides valuable insights, the dynamic needs, preferences, and circumstances of individuals within family units make it difficult to create a precise formula for determining the exact number of households requiring assistance. Some may need rental subsidies, while others may require larger units. For the purposes of this assessment, unmet needs were estimated by identifying households that spend more than 30% of their gross monthly income on housing expenses, referred to as "cost-burdened" households. It is important to note that the City does not aim to assist only those households experiencing a cost burden.

Describe the need for specific types of housing:

The City of Tustin recognizes the ongoing need to provide adequate affordable housing for special needs groups, including the elderly, disabled individuals, those with developmental disabilities, female-headed households, large families, the homeless, and veterans.

Discussion

The City of Tustin is committed to maintaining and preserving its housing stock to prevent unhealthy living conditions, avoid costly future rehabilitation, stop neighborhood deterioration, and foster community pride. The City enforces codes and offers incentives to encourage proper maintenance and conservation of housing.

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

Introduction

Following county and statewide trends, the cost of housing in the City of Tustin has risen significantly over the past five years. Data from HUD, as shown in Tables 3 and 4, illustrates the increase in housing costs for both owners and renters between 2009 and 2020. Both tables indicate a rise in housing costs for both owner-occupied and renter-occupied households.

Table 5 of the Needs Assessment reveals that 6,935 renter-occupied households (26.2% of total households) and 2,225 owner-occupied households (8.4% of total households) spend more than 30% of their income on housing costs, putting them at high risk for homelessness and other economic challenges. According to the 2023 American Community Survey 1-Year Estimates, the median gross rent for renter-occupied households in Tustin is \$2,615, and 61.8% of these households spend over 30% of their monthly income on housing.

HUD data in Table 3 shows that the median home value in Tustin increased by 35% from 2009 to 2020, reaching \$693,000. Since 2020, home prices have surged dramatically, driven in part by pandemic-related financial stabilization measures, including extremely low mortgage rates of 2% to 3%. These low rates spurred high demand, leading to a significant rise in home values. According to Zillow, the average home value in Tustin for 2024 is \$1,132,048, reflecting an 11.6% increase from 2023 and a 39% increase since 2020. Additionally, the 2023 American Community Survey 1-Year Estimates show that the median monthly cost of owning a home in Tustin is \$3,277, with a median mortgage of \$939,300. Approximately 40.7% of Tustin homeowners spend more than 30% of their monthly income on housing costs.

Data from HUD in Table 3 reveals that median contract rents increased by 27%, from \$1,424 to \$1,806, between 2009 and 2020. More recently, the 2023 ACS 1-Year Estimates show the median rent has risen to \$2,615, a \$809 increase, or a 45% jump, since 2020. Furthermore, Table 4 shows that nearly 34% of all renters in Tustin pay more than \$2,000 per month in rent.

Table 6 compares the 2024 Fair Market Rent (FMR) for Orange County, as published by HUD, with the median rent data from the 2016-2020 ACS. It illustrates a continued upward trend in rents, with increases of at least 7% for all bedroom sizes between 2020 and 2024 compared to 2016-2020 ACS median rent.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	514,500	693,000	35%
Median Contract Rent	1,424	1,806	27%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	740	5.6%
\$500-999	220	1.7%
\$1,000-1,499	2,640	19.8%
\$1,500-1,999	5,215	39.2%
\$2,000 or more	4,505	33.8%
Total	13,320	100.0%

Table 30 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	510	No Data
50% HAMFI	1,670	530
80% HAMFI	7,790	1,160
100% HAMFI	No Data	1,920
Total	9,970	3,610

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

Table Definition

HAMFI - HUD Adjusted Median Family Income

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	2,200	2,344	2,783	3,769	4,467
High HOME Rent	1,826	1,958	2,352	2,708	3,001
Low HOME Rent	1,381	1,479	1,776	2,051	2,288

Table 32 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

According to Table 5, the majority of rental housing in Tustin is affordable to individuals with low-income levels, based on 2016-2020 CHAS data. Many of the units accessible to the extremely low (0%-30% HAMFI*), very low (30%-50% HAMFI), and low (50%-80% HAMFI) income populations are rental units. As a result, fewer ownership units are available to these income groups, with most of the available ownership

housing being accessible to those at the 80%-100% HAMFI income level. The very low- and low-income populations are similar in size, but both face limited housing options. Additionally, no data was available on the number of units purchased by the extremely low-income population.

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

According to Census data, ACS data, and information from the California Association of Realtors, housing market trends indicate that housing affordability will continue to decline as home values and rents rise.

The distinction between renter and owner housing affordability is important because, while homeowners may stretch their finances to afford a home purchase, they always have the option to sell, which can help reduce housing costs. Additionally, homeownership offers tax benefits that can lower monthly expenses. In contrast, renters are limited to the rental market and are generally required to pay the prevailing market rent, with fewer options for reducing their housing costs.

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 City of Tustin does not have HOME funding; however, the median rent rates remain below the fair market rent for all unit types. The City is committed to preserving the existing affordable housing options available to its residents.

Discussion

The demand for affordable housing continues to increase, with most residents in the City of Tustin facing a housing cost burden due to the current average housing costs. The City of Tustin prioritizes the creation and preservation of affordable housing opportunities for both renters and homeowners. The City is actively pursuing additional funding opportunities to leverage federal resources for the development and maintenance of affordable housing, while also fostering strong relationships with both for-profit and nonprofit developers.

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

Introduction

The housing stock in Tustin is gradually aging, with over 46% of all owner-occupied and renter-occupied homes being over 45 years old. As the housing stock continues to age, the percentage of units in poor condition will increase unless proper maintenance and rehabilitation are carried out. This is particularly common in lower-income areas where funds for repairs are often unavailable. Every resident of Tustin deserves suitable and affordable living conditions, but home repairs can become costly.

Approximately 42% of all occupied housing units in Tustin have at least one selected condition. For this section, selected conditions include lacking complete plumbing or kitchen facilities, having more than one person per room, and experiencing a cost burden greater than 30%. According to the 2022 American Community Survey 5-Year Estimates, very few occupied units (1.61%, or 426 units) lack complete plumbing or kitchen facilities.

As shown in Table 8, 50% of Tustin's housing stock was built before 1979. Of these units, 47% are owner-occupied, and 54% are renter-occupied. According to the 2022 ACS data, just over 10% of owner-occupied units and 16% of renter-occupied units have children under 6 years old. These households represent those at risk of lead-based hazards in Tustin's housing stock.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

Standard Condition: A standard unit would be a unit that meets state and local housing and building codes.

Substandard Suitable for Substantial Rehabilitation: Units with conditions that are found to be substandard but suitable for substantial rehabilitation are those units where the cost of the improvement to bring it up to all local, state and federal codes does not exceed 50% of the value of the unit inclusive of the land value.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,775	29%	7,305	55%
With two selected Conditions	45	0%	1,320	10%
With three selected Conditions	0	0%	60	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	9,365	71%	4,635	35%
Total	13,185	100%	13,320	100%

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,785	21%	2,285	17%
1980-1999	4,260	32%	3,820	29%
1950-1979	5,835	44%	6,980	52%
Before 1950	305	2%	230	2%
Total	13,185	99%	13,315	100%

Table 34 – Year Unit Built

Data Source: 2016-2020 CHAS

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	6,140	47%	7,210	54%
Housing Units build before 1980 with children present	1,980	15%	1,045	8%

Table 35 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Table 10 Explanation

(Owned) status, with an additional 509 properties in distress, meaning they are in foreclosure and/or delinquent on property taxes.

Need for Owner and Rental Rehabilitation

Given the age of the City's housing stock, with 46% of units over 45 years old, it is anticipated that a significant number of units will require repairs and/or rehabilitation, particularly for major housing systems such as roofs, heating and air conditioning, plumbing, and electrical. These critical components typically have a life expectancy of 15 to 30 years and will soon need to be replaced. The Community Assessment Survey identified programs that assist low- and moderate-

income renters and homeowners with new affordable units, down-payment assistance and energy efficiency improvements as the highest priority.

In 2024, the City launched its CDBG-funded housing rehabilitation program. In partnership with Habitat for Humanity, the City implements the Home Repair Program, which provides grants of up to \$15,000 to low-income seniors (62 years and older), veterans, or disabled households for essential home repairs. The focus of the program is to improve the health and safety of homes, addressing repairs to plumbing, electrical, roofing, kitchen facilities, and alleviating overcrowding. The City will continue to operate the Home Repair Program throughout the 2021-2029 Housing Element Planning Cycle.

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

Lead-based paint hazards refer to any condition that causes exposure to lead from lead-based paint dust, contaminated soil, or deteriorated lead-based paint found on accessible surfaces, friction surfaces, or impact surfaces. These hazards can lead to adverse health effects, particularly for children. Lead poisoning remains one of the most common and preventable health risks for children in the United States. Even low levels of lead in a child's blood can cause harmful effects on their physical and developmental health. Children are more vulnerable because their growing bodies absorb more lead, and they frequently put their hands and objects in their mouths. Additionally, their brains and nervous systems are more sensitive to lead's damaging effects.

Residents living in housing built before 1978 are considered at risk of exposure to lead-based paint. Older homes are more likely to contain lead-based paint, with the amount of lead pigment increasing as the age of the housing rises. As mentioned earlier, 50% of Tustin's occupied housing stock was built before 1980 and may contain lead-based paint. To address this, the City's Home Repair Program will follow federal guidelines for handling lead-based paint.

According to the 2022 American Community Survey 5-Year Estimates (Table S1702), 8.1% of Tustin's families live below the poverty level. Assuming these families reside in older areas of the City, it can be estimated that around 1,080 housing units occupied by low- or moderate-income families may be at risk of lead-based paint exposure. Additionally, 10.5% of families living in poverty have children under five years old, which suggests that approximately 113 units may present a higher risk for lead-based paint hazards. This analysis does not account for the likely presence of a larger population of households with incomes above the poverty level but below low- and moderate-income thresholds living in older units, which could significantly increase the estimated number of units at risk.

Discussion

Although around 81% of Tustin's housing was built 25 years ago or earlier, the overall condition of the housing remains generally good. According to the City's Code Enforcement team and the Neighborhood Improvement Task Force—comprised of staff from various City departments—roughly 15% of the housing stock requires minor repairs. About 5% of the housing units, particularly four-plexes in the southwest neighborhood (CDBG Low/Mod Census Tract Target Area), may need significant rehabilitation. Code Enforcement estimates that around 200 illegal units or conversions exist citywide, which would need to either meet City Code standards or be demolished. To date, no housing units have been identified as requiring replacement. The City of Tustin actively addresses housing conditions through its Code Enforcement program and the Neighborhood Improvement Task Force, which together help identify homes in need of repair and provide the necessary assistance to keep the housing stock in good condition.

To tackle the need for rehabilitating Tustin's aging housing stock, the city has established the Home Repair Program. This program offers \$15,000 grants to low-income seniors (aged 62 and older), veterans, and disabled households for health and safety improvements, helping to preserve their homes and ensure they remain safe, decent, and sound. The program covers repairs such as roof replacement, plumbing, windows, electrical systems, and exterior painting. Homeowners are referred to the program in collaboration with Code Enforcement.

DRAFT

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

Introduction

The City of Tustin does not have Public Housing. Instead, the City receives housing support through the Orange County Housing Authority (OCHA) voucher program. As of October 2024, 630 households in Tustin were receiving rental assistance through OCHA.

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				9,925			879	1,669	0
# of accessible units									

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

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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:

The City of Tustin does not have any public housing units.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 38 - Public Housing Condition

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

The City of Tustin does not have any 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:

The City of Tustin does not have any public housing units.

Discussion: N/A

DRAFT

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

Introduction

The City of Tustin is served by a variety of agencies that provide direct housing and wrap-around services to homeless individuals. These organizations, located in Tustin or serving Tustin residents, include but are not limited to: 2-1-1 Orange County; Orange County Rescue Mission Village of Hope; Orange County Social Services Tustin Family Campus in partnership with Orangewood Children's Home; Olive Crest; Laurel House; Human Options; Goodwill of Orange County (Tierney Center for Veterans Services); Mercy House Armory and Family Care Center; Mary's Shelter; Patriots & Paws; Veterans Legal Institute; City Net; Families Forward; Family Promise of Orange County; Habitat for Humanity Orange County; and OC Gateway to Housing.

Table 13 presents Continuum of Care data for Orange County's facilities and housing targeted to homeless households. As of December 31, 2022, Orange County had a total of 8,894 beds available, marking an increase of 1,966 from 2021. Of these, 2,529 are year-round emergency shelter beds, 71 are seasonal beds, 868 are transitional housing beds, 1,097 are rapid re-housing beds, 1,067 are other permanent housing beds, and 2,793 are permanent supportive housing beds available to families, adults, and unaccompanied youth. These beds are also allocated to specific special populations, including 659 beds for chronically homeless individuals, 1,354 for veterans, 55 for youth, and 544 for those affected by

	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 Child(ren)	4,003	71	816	1,149	0
Households with Only Adults	4,871	528	289	1,976	0
Chronically Homeless Households	659	0	0	0	0
Veterans	1,178	0	26	0	0
Unaccompanied Youth	28	0	14	14	0

domestic

violence.

Facilities and Housing Targeted to Homeless Households

Table 39 - Facilities and Housing Targeted to Homeless Households

Orange County, CA (CA-602) 2022 Housing Inventory Count

Data Source

Comments:

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

To complement Tustin's homeless services, the State Department of Developmental Services (DDS) provides community-based support to approximately 400,000 individuals with developmental disabilities and their families through a network of 21 regional centers, four developmental centers, and two community-based facilities. The Regional Center of Orange County (RCOC) is one of these 21 regional centers in California, serving as a point of entry for services for individuals with developmental disabilities. RCOC is a private, non-profit community agency that partners with local businesses to offer a wide variety of services to individuals with developmental disabilities and their families.

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.

As previously mentioned, the City of Tustin participates in the County of Orange's full-service continuum of care, which addresses homelessness at every stage. Additionally, Tustin hosts various non-profit organizations that provide direct housing and support services to homeless individuals. These services include emergency shelters, transitional housing, temporary housing for teenagers in crisis, veteran support, and housing specifically for veterans and their families. Several local churches in Tustin also offer food and other assistance to the homeless.

The largest provider of emergency shelter beds in Tustin is the Tustin Temporary Emergency Shelter, which offers 77 beds for men, women, and families with children. Operated by Temporary Shelter, Inc., this facility provides a variety of wrap-around and supportive services on-site. It has been established to ensure that homeless individuals with ties to Tustin can access a bed and shelter.

The largest provider of transitional housing beds in Tustin is the Orange County Rescue Mission's Village of Hope, which offers 262 beds. Additionally, the Village of Hope provides 26 units of transitional housing specifically for veterans through a partnership with the City of Tustin.

Laurel House offers temporary housing for up to six homeless and runaway youth in crisis, providing a home-like environment. The facility also offers food, informal counseling, medical care, and clothing. The young people served are primarily Tustin residents and students of the Tustin Unified School District.

Olive Crest provides shelter and counseling for teenagers transitioning out of the foster care system into independent living. They offer life skills training, such as budgeting, job search techniques, and interview skills, to help these young adults succeed in their independent lives.

Additionally, Habitat for Humanity has constructed two affordable housing units specifically for veterans and their families.

Several local churches in Tustin, including St. Cecilia’s, Tustin Presbyterian Church, and Aldersgate United Methodist Church, also provide services for the homeless and low-income families.

Numerous other agencies provide shelter and services to homeless individuals in Tustin as well as surrounding cities such as Santa Ana, Irvine, and Orange. The City of Tustin refers individuals to these agencies, including CityNet, Human Options, Mercy House, Families Forward, OC Gateway to Housing, and Family Promise of Orange County, among others. The Orange County Homeless Issues Task Force, a non-profit advocacy organization, maintains a list of these and other services available in Orange County.

The City of Tustin actively assists the unsheltered homeless population through a collaborative effort involving the Tustin Police Department, CityNet, Orange County Health Care Agency (PERT Mental Health Services), Orange County Rescue Mission, and the Tustin-based non-profit Operation Warm Wishes. This collaboration provides resources and services to homeless individuals in Tustin.

DRAFT

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

Introduction

Certain segments of the population may face greater challenges in finding decent, affordable housing due to their unique circumstances and special needs. This includes the elderly and frail elderly, individuals with mental, physical, or developmental disabilities, those struggling with alcohol or drug addiction, persons living with HIV/AIDS and their families, as well as victims of domestic violence, dating violence, sexual assault, and stalking. These groups may require specific housing modifications or support services to meet their needs.

While these non-homeless special needs populations are not automatically at risk of homelessness, without adequate supportive housing and services, they are more likely to remain in poverty and may eventually face homelessness or institutionalization. In preparing the Consolidated Plan, Tustin addresses the needs of these special populations and evaluates the suitability of the housing stock to accommodate their requirements, as outlined below.

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

Elderly Persons

Currently, the City of Tustin has a total of 325 senior housing units, many of which are affordable, as well as 24 assisted living facilities. The affordable senior housing units include 99 units at Tustin Gardens, which are restricted to seniors, a 20-unit project at Tustin Terrace for seniors with limited incomes, 53 units at Heritage Place, and 153 units at Coventry Court, available to very low-income (36 units), low-income (61 units), and moderate-income (56 units) seniors.

The special housing needs of the elderly are a significant concern for Tustin, especially since many retired individuals live on fixed, low incomes, making them more vulnerable to housing cost burdens. Additionally, elderly residents often require housing modifications to accommodate mobility and accessibility needs, such as ramps, handrails, and lower cupboards and counters. In terms of location, seniors typically need easy access to public services like medical care, shopping, and public transportation due to limited mobility. Two facilities catering to elderly residents with specialized needs include Silverado Tustin Hacienda Memory Care Community and The Groves of Tustin Senior Living.

Elderly individuals may also need security devices for their homes to ensure personal safety. Many prefer to remain in their own homes rather than move to a retirement community, so they may require assistance with home repairs and yard work. It is essential to maintain their dignity, self-respect, and quality of life. Transportation is another key concern for seniors, as many lack private vehicles due to

physical or financial limitations. Reliable transportation to medical appointments, senior centers, meal sites, and shopping is vital for many elderly residents.

The major county providers of programs specifically for older adults in Orange County include:

- » Office on Aging (OoA)
- » CalOPTIMA
- » Health Care Agency (HCA)
- » Housing and Community Development Department (H&CD)
- » Public Administrator/Public Guardian (PA/PG)
- » Social Services Agency (SSA)
- » Orange County Transportation Authority (OCTA)
- » Veterans Services Office (VSO)

Persons with alcohol or drug addictions may also require affordable housing with supportive services, as well as access to counseling, court services, healthcare, and substance abuse intervention programs.

The needs of these populations in Tustin are assessed through available demographic data and information from public services and nonprofit providers. Collaboration with these agencies during the development of the City's strategic plan helps identify programs that align with local demand.

Mentally ill residents in Tustin may require affordable housing along with a wider range of supportive services than the general population. These services may include counseling, prescription assistance, healthcare, substance abuse counseling, job referrals, and crisis intervention.

According to data from the 2018-2022 American Community Survey 5-Year Estimates, approximately 5,827 people in Tustin, or 7.3% of the population, live with a disability. The prevalence of disability is significantly higher among seniors, with 45.3% of individuals aged 75 and older living with some form of disability. These residents may need affordable and accessible housing, home improvement programs to add accessibility features, fair housing counseling, and healthcare assistance.

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

The City does not currently operate any programs specifically for individuals transitioning from mental and physical health institutions. Tustin residents are referred to the following County programs that aim

to provide comprehensive support, including mental health services, housing assistance, and employment resources.

1. Orange County Health Care Agency (HCA) Behavioral Health Services:

The HCA's Behavioral Health Services Division provides a continuum of care, including prevention, early intervention, outpatient services, intensive inpatient services, and ancillary support services. These services are designed to improve health outcomes and facilitate linkages to housing and non-medical services.

2. Community Assistance Recovery Empowerment (CARE) Act:

The CARE Act allows designated individuals, such as family members, public guardians, and certain professionals, to petition for a CARE Plan or Agreement for individuals with untreated schizophrenia or psychosis. This plan includes housing and treatment services aimed at supporting successful community integration.

3. Orange County Rescue Mission (OCRM):

OCRM is a faith-based nonprofit organization focused on reducing homelessness and supporting individuals transitioning from institutional settings. They offer programs that include housing, food, clothing, job training, medical care, dental care, psychological counseling, and spiritual support. Many programs are tailored for veterans, families, youth, victims of domestic violence, and victims of sex trafficking.

4. Mariposa Women & Family Center:

Mariposa provides comprehensive mental health and substance abuse support, including counseling and legal resources, to individuals transitioning back into society. Their programs are designed to assist vulnerable populations in achieving stability and healing.

5. Goodwill of Orange County's Employment WORKS Program:

This program offers individualized job placement and retention services to adults living with mental health diagnoses. Participants work with employment specialists and peer mentors to identify job opportunities and achieve vocational goals, supporting their reintegration into the workforce.

6. Mental Health Association of Orange County (MHAOC):

MHAOC provides comprehensive mental health services, including counseling, advocacy, and education. They offer a wide range of programs to promote mental wellness, address mental health challenges, and reduce stigma, supporting individuals transitioning from institutional care.

7. National Alliance on Mental Illness (NAMI) Orange County:

NAMI offers education, support, and advocacy for individuals and families affected by mental illness. They provide support groups, educational programs, and a helpline for immediate assistance, aiding those re-entering the community after institutional stays.

These programs collectively offer a robust support system for individuals returning from mental and physical health institutions in Orange County, addressing various needs from healthcare to employment and community integration.

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

The City's Senior Center plays a key role in supporting elderly and frail elderly populations by offering a variety of services, including transportation, case management, information and referrals, shared housing programs, senior activities, health and fitness programs, and other recreational opportunities. Throughout each year of the five-year Consolidated Plan cycle, the City expects to serve approximately 2,000 seniors at the Tustin Senior Center.

The City also allocates CDBG funds to Meals on Wheels Orange County to provide meal services for the elderly, both at the Tustin Area Senior Center and for frail, home-bound elderly individuals. Meals on Wheels OC estimates that they will deliver around 145 congregate and/or home-delivered meals to Tustin residents each year.

Additionally, the City will continue to refer individuals with special needs, including those with physical, mental, or developmental disabilities, alcohol or drug dependencies, and those with HIV/AIDS, to the appropriate agencies for further assistance.

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 in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

This question repeats the previous item; please refer to the response above.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

As outlined by the Consolidated Plan regulations, a barrier to affordable housing is any public policy, including land use controls, property taxes, zoning ordinances, building codes, fees and charges, growth limits, and other related policies. These barriers arise when incentives for developing affordable housing are diminished due to excessive development costs or a lack of community support. While some development costs are influenced by economic conditions and other market factors beyond local government control, the development of affordable housing is also impacted by federal, state, and local housing policies, as well as the "Not In My Backyard" (NIMBY) attitude.

Although federal and state environmental regulations are enforced locally, these policies have contributed and may continue to contribute to increased development costs.

- » Land use development
- » Labor and material costs
- » Land costs
- » Environmental challenges (such as wastewater, floodplains, and capacity issues)
- » Deed restrictions and covenants

Barriers to Affordable Housing Continued Discussion

Zoning Ordinances

Development standards include zoning ordinances, subdivision ordinances and building code requirements. The most far-reaching constraints are those contained in the City's zoning ordinance, which is the most traditional tool used by a local jurisdiction to regulate the use of private land. Zoning regulates the use, density, floor area, setbacks, parking, placement and mix of residential, commercial, and industrial projects. Zoning can also regulate the intensity of residential land use through minimum lot size requirements.

The City, while encouraging housing, is also concerned about the living environment that is created based on standards such as:

- » Density
- » Height
- » Setbacks
- » Under grounding of utilities

- » Aesthetics
- » Parking

Housing Development Fees

Various fees and assessments are charged by the City and other outside agencies (e.g., school districts, sewer/sanitation agencies) to cover costs of processing permits and providing services and facilities, such as utilities, schools and infrastructure. Almost all of these fees are assessed based on the concept of cost recovery through a pro rata share system, based on the magnitude of the project's impact or the extent of the benefit which will be derived.

Tustin is highly urbanized with most of its necessary infrastructure, such as streets, sewer and water facilities already in place. Nonetheless, site improvements can significantly add to the cost of producing housing. Cost-effective site planning or use of housing set-aside funds for those projects within the redevelopment project areas can minimize site improvement costs.

Development Review Process

The evaluation and review process required by City procedures contributes to the cost of housing in that holding costs incurred by developers are ultimately manifested in the unit's selling price. State Law establishes maximum time limits for project approvals and City policies provide for the minimum processing time necessary to comply with legal requirements and review procedures.

Infrastructure Constraints

All development within the City is scrutinized for its impacts on the community in transportation, sewer, parks, recreation and pedestrian use. The cost of new or improved infrastructure is often paid by the developer, who shifts the cost to the project, thus increasing the housing costs.

Davis-Bacon Wage Compliance

A prevailing wage must be paid to laborers when federal funds are used for any project over \$2,000 or any multi-family project over eight units. The prevailing wage is usually higher than competitive wages. Davis-Bacon requires extensive paperwork that adds to housing costs to document the prevailing wages in order to comply with monitoring requirements.

Floodplain Insurance

When federal funds are used to rehabilitate homes or build new homes located in a floodplain zone, the developer or homeowner is required to obtain flood insurance. This requirement can be costly and impact low-income homeowners, especially where minor rehabilitation is involved.

Existing Needs

Existing needs as discussed within the Needs Assessment Section of the Consolidated Plan include housing problems such as substandard housing lacking complete plumbing or kitchen facilities, overcrowding, cost burdened families, and families with a disproportionately greater need.

DRAFT

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

Introduction

Consolidated Plan regulations require an evaluation of community development needs, covering areas such as public facilities, public improvements, public services, and economic development. The Community Development Department, as the primary entity overseeing the Consolidated Plan, is dedicated to creating effective investment strategies to address these needs through the City's Community Development Block Grant (CDBG) program. The MA-25 discussion section offers a comprehensive analysis of the data presented in the following tables.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	265	14	1	0	-1
Arts, Entertainment, Accommodations	4,848	5,322	14	13	-1
Construction	2,063	3,719	6	9	3
Education and Health Care Services	5,437	5,270	16	12	-4
Finance, Insurance, and Real Estate	3,336	5,292	10	12	2
Information	1,024	1,757	3	4	1
Manufacturing	3,653	3,764	11	9	-2
Other Services	1,219	2,411	4	6	2
Professional, Scientific, Management Services	4,940	5,306	15	13	-2
Public Administration	0	0	0	0	0
Retail Trade	3,854	6,346	11	15	4
Transportation and Warehousing	893	326	3	1	-2
Wholesale Trade	2,237	2,886	7	7	0
Total	33,769	42,413	--	--	--

Table 40 - Business Activity

Data 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	43,940
Civilian Employed Population 16 years and over	42,040
Unemployment Rate	4.32
Unemployment Rate for Ages 16-24	9.08
Unemployment Rate for Ages 25-65	3.09

Table 41 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	14,290
Farming, fisheries and forestry occupations	1,595
Service	3,510
Sales and office	9,465
Construction, extraction, maintenance and repair	2,055
Production, transportation and material moving	1,800

Table 42 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	25,183	67%
30-59 Minutes	10,310	27%
60 or More Minutes	2,238	6%
Total	37,731	100%

Table 43 - Travel Time

Data Source: 2016-2020 ACS

Education

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,880	230	1,310

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	5,700	275	1,260
Some college or Associate's degree	8,520	350	2,540
Bachelor's degree or higher	17,195	500	2,310

Table 44 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	164	285	570	1,720	890
9th to 12th grade, no diploma	440	840	780	1,225	290
High school graduate, GED, or alternative	1,790	2,085	2,190	2,960	1,590
Some college, no degree	3,205	2,380	1,760	3,450	2,230
Associate's degree	330	1,230	615	1,975	765
Bachelor's degree	835	4,155	3,260	5,100	2,365
Graduate or professional degree	19	1,820	2,565	3,125	1,820

Table 45 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	59,228
High school graduate (includes equivalency)	72,866
Some college or Associate's degree	74,512
Bachelor's degree	151,903
Graduate or professional degree	191,972

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on 2016-2020 ACS data (Table 17), the two highest occupations sectors in the City are Management, business and financial and sales and office. The smallest occupation sector is farming, fisheries and

forestry occupations. As Tustin is an urbanized city, these sectors are in line with the type of work that would be typically available in a built-out, urban area.

Employment projections from 2016 to 2040 indicate that employment in the City of Tustin is expected to grow by approximately 42 percent. The largest share of employment is projected to be in service occupations, accounting for 41.1 percent of the workforce. However, due to shifts in retail shopping trends, with more customers making purchases online, there is expected to be a decreased demand for retail space, which could potentially affect retail employment moving forward.

Describe the workforce and infrastructure needs of the business community:

Nearly half of Tustin's active workforce has completed a college education. Many of the City's residents commute to neighboring cities or further for work, with an average commute time exceeding 30 minutes. Creating local employment opportunities would benefit the community, particularly by establishing a balance between jobs and housing. This includes working with existing businesses to expand and attract new companies in targeted industries, as well as supporting business startups. Encouraging the relocation of companies to Tustin and enhancing transportation options would also have a positive impact on the local workforce. Additionally, job training, skill development, and education tailored to the needs of local industries would be crucial for improving employment prospects for Tustin residents.

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 City is presently marketing land within the Tustin Legacy Area to attract retail, office, and professional uses, which will help expand the local job market. The recent development of the Flight at Tustin Legacy corporate campus has already created more opportunities for employers and jobs in the City. Additionally, the opening of the SchoolsFirst Federal Credit Union corporate campus has further contributed to job growth in Tustin. A new corporate and education campus for Advantech is also under construction in the Advanced Education and Technology Park (ATEP) area of Tustin Legacy, and it is expected to bring many new job opportunities to the City. In addition, a large corporate/education campus (Advantech) has broken ground in the Advanced Education and Technology Park (ATEP) area of Tustin Legacy, which is slated to bring many new jobs to Tustin.

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

According to Table 14, which includes data from the 2011-2015 ACS, there are 33,769 workers in the workforce and 42,413 jobs available in the City of Tustin, indicating a surplus of jobs relative to workers. However, a closer look at the breakdown of businesses by sector reveals that certain industries have more workers than available jobs. These industries include agriculture, mining, oil and gas extraction, education

and healthcare services, and transportation and warehousing. The most significant imbalance is seen in the retail trade sector, with a shortage of 2,492 workers, followed by finance, insurance, and real estate (with a deficit of 1,956 workers) and construction (with a shortage of 1,656 workers).

These trends represent a shift from pre-pandemic patterns. Notably, the construction sector has seen a reversal. Before the pandemic, there were more workers in construction than available jobs, but post-pandemic—despite a booming construction market—there is now a shortage of construction workers. During the early days of the pandemic, construction activities slowed, and many workers left the industry to pursue other opportunities. The resulting decrease in experienced construction tradespeople has led to rising construction costs, as higher wages are now being offered to attract workers back into the sector.

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.

The City of Tustin has previously directed CDBG funding to support a Job Creation and Business Incentive Program. This program offered a forgivable loan to new businesses that hired one full-time equivalent employee who was a low- to moderate-income Tustin resident. The current Consolidated Plan maintains a strong emphasis on Economic Development needs, prioritizing a range of incentives and support for the local workforce in Tustin.

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

No

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 City of Tustin maintains a variety of Economic Development and Business Assistance activities, some of which may have the potential to leverage CDBG funds. Programs and activities include: Micro-enterprise assistance including the City of Tustin's partnership with the Small Business Development Center, and the City's Small Business Grant Program which anticipates providing approximately \$85,000 in small business grants during 2024; Tustin's newly created Business Concierge Program which guides business owners through the permitting process and ensures a streamlined approach to opening their businesses; Partnership with the Tustin Chamber of Commerce and supporting Tustin's Businesses through events, and ribbon-cutting ceremonies; Real Property Marketing in the Tustin Legacy area to bolster local economy; to name a few.

Discussion

As shown in Table 15, the 2016-2020 ACS data indicates that the City of Tustin had 33,769 employed residents. The Bureau of Labor Statistics reports that the unemployment rate statewide in October 2023 was 5.1%, whereas Tustin's unemployment rate was notably lower at 3.1%.

Table 15 also highlights the top industries where Tustin's workforce is employed. These include retail trade (13%) and a combination of Arts, Entertainment, Accommodations, Education and Health Care Services, Finance, Insurance, and Real Estate, as well as professional, scientific, and management services (11%).

Furthermore, the 2016-2020 ACS data shows that 17,195 employed Tustin residents (48.72%) hold a bachelor's degree or higher. An additional 24.14% of the working population has some college education or an associate's degree. Approximately 16% of Tustin's employed residents have a high school diploma or equivalent, while around 11% have not graduated high school.

DRAFT

MA-50 Needs and Market Analysis Discussion

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

This section of the Consolidated Plan includes CPD Maps that illustrate the concentration of families with Extremely Low Income, Low Income, and Moderate Income who are experiencing at least one of the four severe housing problems outlined in the Needs Assessment section of this Plan. These families are predominantly concentrated within Tustin's CDBG Low/Mod Census Tract Target Area, located in the southwestern part of the city. For the purposes of this analysis, "concentration" refers to census tracts where 51% or more of the population is affected by one of the four housing problems.

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

"Areas of racial/ethnic minority concentration" are defined as Census tracts where the percentage of a minority population—defined as any race or ethnic group with a minority representation city-wide—equals or exceeds the overall city-wide percentage of that group.

"Areas of low-income concentration" refer to Census blocks/tracts where at least 51% of the population consists of low- and moderate-income individuals. However, some communities are permitted to use the "exception criteria" and undertake area benefit activities in any residential areas where the proportion of low- and moderate-income persons is within the upper quartile of all areas in the jurisdiction.

Based on data from CPD Maps (shown on the following page), concentrations of both minority populations and low-income families can be found in certain Census tracts within the CDBG Low/Mod Income Target Area. The white and light blue areas on the map indicate higher concentrations of minority populations, while the darker colors represent areas with lower concentrations.

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

The housing market in these areas/neighborhoods is characterized by families with low to moderate incomes, which often results in higher housing cost burdens. These families are more likely to experience one or more of the four housing problems outlined in the Needs Assessment section of this Consolidated Plan. As a result, there is a significant need for affordable housing options and additional supportive services.

Are there any community assets in these areas/neighborhoods?

Community assets in these areas/neighborhoods include several City parks, the Tustin Area Senior Center, the Tustin Family Youth Center, and Kids Corner Preschool. These facilities primarily serve low- and moderate-income residents.

Are there other strategic opportunities in any of these areas?

The City of Tustin allocates CDBG funding within the Low/Moderate Income Census Tract Target Area to address public facility needs, infrastructure improvements, public services (including youth and senior services), and economic development. There are ongoing opportunities to enhance existing facilities or develop new ones to better serve the residents in this area. The City will continue to prioritize CDBG funding within this Target Area.

DRAFT

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The internet has become a crucial platform for communication and information, enabling users to benefit from the interconnectedness of business, education, commerce, and daily activities. Reliable internet access is increasingly essential for success in today's economy. Communities without broadband access face challenges in keeping up with broader trends, limiting their ability to access educational and entrepreneurial opportunities online. This issue is especially significant in low- and moderate-income (LMI) areas, where economic opportunities are already limited. Research shows a strong link between increased high-speed internet access and improved education and employment prospects, particularly in small cities and rural areas.

The City of Tustin has minimal gaps in broadband coverage, with AT&T serving approximately 91% of the area. According to 2023 census data, 95.1% of Tustin residents have broadband internet subscriptions, and only 1.3% lack computer access, including residents in the City's Low/Moderate Income Census Tract Target Area.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Once broadband access is established, it's crucial to maintain competition among service providers. A single provider monopolizing an area may have little incentive to deliver consistent, high-quality services. The City of Tustin enjoys a healthy level of competition among internet service providers. The following are the main providers serving the area:

- » AT&T offers cable and fiber services, covering 27% of Tustin.
- » EarthLink provides services covering 83% of the area.
- » Cox Communications offers cable services, including fiber optic, covering 99% of Tustin.
- » Spectrum provides cable services covering 54% of the city.

Additionally, satellite internet services are available through Viasat, providing mobile and accessible internet options for residents.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The City of Tustin's 2019 Hazard Mitigation Plan outlines an analysis of various hazards, including earthquakes, extreme heat, wildfires, drought, windstorms, dam/reservoir failure, mass transit accidents, power failures, terrorism, pandemics, hazardous materials releases, and flooding. However, it does not specifically address climate change. The most recent Hazard Mitigation Plan published by the County of Orange in 2020 acknowledges that climate change will exacerbate the severity and frequency of other hazards, such as wildfires, flooding/storms, and tsunamis (due to sea level rise). As a result, the hazard analysis process will become more complex, and specific climate change hazards, like sea level rise, may be incorporated into future updates.

Climate change has been identified as a significant natural hazard, with the most likely impacts being floods, urban fires, and drought. The County's hazard mitigation plan discusses the effects of climate change on various areas, including water supply and demand, concerns about sea level rise, water quality, flooding, property, infrastructure, services, and the vulnerability of ecosystems and habitats.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

According to the County of Orange's 2020 Hazard Mitigation Plan, climate change has the potential to impact numerous sectors of the economy, extending far beyond areas directly affected by sea level rise or long-term temperature increases. These impacts will be complex, with both direct and indirect consequences. Direct impacts could include reduced agricultural productivity, increased fire hazards, decreased drinking water levels, and higher wildlife mortality rates, along with damage to wildlife and fish habitats.

The consequences of these impacts could lead to a range of challenges, including reduced business income, rising food and resource prices, unemployment, lower tax revenues due to decreased spending, increased crime, foreclosures on business loans, and migration. The interconnectedness of these effects makes it difficult to estimate financial damages accurately. The impacts of climate change can be classified into three categories: economic, environmental, and social.

Social impacts would involve public safety, health concerns, reduced quality of life, and inequalities in the distribution of impacts and disaster relief. Many of the economic and environmental impacts also have significant social components. For instance, migration from coastal areas could lead to increased pressure on social infrastructure in other regions.

Municipalities will face difficult decisions regarding which critical assets to protect, relocate, or remove, while also determining what is economically feasible. Balancing goals such as protecting essential

infrastructure, maintaining coastal recreation, and safeguarding ecosystems will be a complex challenge. Agencies must recognize potential conflicts and prioritize actions, working closely with regulatory bodies to develop solutions.

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2025-2029
CONSOLIDATED
PLAN

STRATEGIC
PLAN



Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan section summarizes the City's five-year goals to address community needs described earlier in the Consolidated Plan. The City strives to accomplish these goals by maximizing and utilizing all available funding resources to conduct housing and community development activities that will serve the low-moderate income residents of the City of Tustin. By focusing resources to the priority needs and creating opportunities at the individual and neighborhood levels, the City hopes to improve the quality of life for residents.

For the 2025 to 2029 period, the City has identified eight (8) priority needs which have been developed according to the City Council's Strategic Plan, CDBG program eligibility, and feedback from the Tustin community. These needs and goal statements will also allow the City to update and align to how activities are structured and reported in the Integrated Disbursement and Information System (IDIS). Additionally, the City's new needs, goals, and project structure enables effective outcome reporting to its partners and the public.

Each Annual Action Plan linked to this Strategic Plan will describe the activities planned for the coming program year to meet its five-year goals. Additionally, each Consolidated Annual Performance and Evaluation Report (CAPER) will report the City's progress in carrying out the goals, projects, and activities in terms of the planned accomplishments for each need.

DRAFT

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

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	CDBG Low/Mod Census Tract Target Area
	Area Type:	CDBG Low/Mod Census Tract Target Area
	Other Target Area Description:	CDBG Low/Mod Census Tract Target Area
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	This area includes the census tracts: 052502, 074406, 074407, 074408, 075505, 075507, 075512, 075513, 075514, 075515, 075701, 075702.
	Include specific housing and commercial characteristics of this target area.	This area has been identified as having a population at least 51% or higher of low/moderate income residents. The housing stock in this area is primarily 30 years old or older, which indicates it may be in need of rehabilitation.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	This area was defined as an "area of low-income concentration" based on HUD's definition of eligible low/moderate income tracts including a population of 51% or higher in the low/moderate income categories.
Identify the needs in this target area.	Needs within this area include affordable housing, child care, improved access to public facilities and services, and infrastructure street/sidewalk improvements.	
What are the opportunities for improvement in this target area?	Opportunities for improvement in this area include providing increased access to services for youth and children, increased access to public facilities such as parks, and improving the conditions of sidewalks and streets.	

	Are there barriers to improvement in this target area?	As CDBG funding is used primarily to benefit persons within the low/moderate income target area, and for projects specifically within the target area, the funding assists in eliminating barriers to improvement for the area.
2	Area Name:	City of Tustin
	Area Type:	Citywide
	Other Target Area Description:	Citywide
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	City of Tustin boundaries.
	Include specific housing and commercial characteristics of this target area.	Various housing, commercial, and industrial areas.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	This target area identifies the area in which public services activities take place.
	Identify the needs in this target area.	Needs identified are based on priority needs as identified by the community.
	What are the opportunities for improvement in this target area?	TBD
Are there barriers to improvement in this target area?	Not at this time.	

General Allocation Priorities

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

The City of Tustin's CDBG funding is typically allocated to public services activities, public facilities and improvements, rehabilitation and preservation activities, economic development and program admin activities which directly benefit low/moderate income persons as a majority. Geographically, Tustin's efforts are concentrated within the CDBG Low/Mod Census Tract Target Area which is located in the southwest portion of the City. This Target Area contains census tracts which have been identified by HUD as having at least 51% low/mod income residents.

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

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Promote Fair Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle
	Geographic Areas Affected	Citywide
	Associated Goals	Affirmatively Further Fair Housing
	Description	Provide ongoing assistance to combat discrimination through the promotion of fair housing education, legal representation, local support for affordable housing development projects, and counseling and financial training services.
	Basis for Relative Priority	The provision of Fair Housing services is a requirement of HUD.
	2	Priority Need Name
Priority Level		High
Population		Extremely Low Low Moderate
Geographic Areas Affected		Citywide
Associated Goals		Expand Affordable Housing Opportunities

	Description	Throughout the City of Tustin, rental and homeownership costs continue to rise, creating increased pressure on low- and moderate-income residents to be able to afford safe and suitable housing. The City will prioritize using HUD resources to promote the acquisition, construction, and/or rehabilitation of new affordable housing units that will serve low- and moderate-income residents as well as special needs populations throughout the City.
	Basis for Relative Priority	The need for additional affordable housing was documented in stakeholder survey, community needs survey, and an analysis of federal and local data sources.
3	Priority Need Name	Support Community Services
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	Citywide
	Associated Goals	Support Community Services
	Description	Many challenges are faced by the City’s vulnerable populations (including low and moderate-income residents as well as special needs populations) and they do not have regular access to critical services and programs such as youth programming, job training, transportation, legal services, senior programming, medical care, and other social services. In addition, the need for comprehensive homeless services, programming and facilities is a critical need within the City. This need includes early intervention homeless prevention, increasing the supply of emergency and transitional shelter options, permanent housing solutions, and the provision of critical services to those who are at-risk of becoming homeless, currently homeless, or recently homeless.
	Basis for Relative Priority	A core provision of the CDBG program is to provide Public Services to the Tustin community. Improving access to these services is a high priority of the City of Tustin.
4	Priority Need Name	Enhance Public Facilities and Infrastructure
	Priority Level	High

	Population	Extremely Low Low Moderate
	Geographic Areas Affected	CDBG Low/Mod Census Tract Target Area
	Associated Goals	Improve Public Facilities and Infrastructure
	Description	Tustin has a continuing need to maintain and enhance existing public infrastructures such as streets, sidewalks, curb/gutters, storm drains, parkways and other infrastructure in the City. These needs include ensuring that public infrastructure is ADA accessible to ensure access for all residents.
	Basis for Relative Priority	Addressing public facility needs and maintaining aging facilities especially within the CDBG Low/Moderate Income Census Tract Target Area will improve the quality of life for residents within the area.
5	Priority Need Name	Promote Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	Citywide
	Associated Goals	Support Economic Development
	Description	To increase the supply and access of livable wage jobs within the City for low and moderate-income residents, Tustin will support micro entrepreneurs to grow and expand businesses throughout the City.
	Basis for Relative Priority	Economic Development activities promote a thriving city, successful businesses, and a high-quality of life for its residents. To this effort, a high priority is placed on Economic Development activities during the ConPlan cycle, whether funded by CDBG or General Fund allocations.
6	Priority Need Name	Support Efforts to Address Homelessness
	Priority Level	High

	Population	Extremely Low
	Geographic Areas Affected	Citywide
	Associated Goals	Support Efforts to Address Homelessness
	Description	The need for comprehensive homeless services, programming, and facilities is a critical need within the City. This need includes early intervention homeless prevention, increasing the supply of emergency and transitional shelter options, permanent housing solutions, and the provision of critical services to those who are at-risk of becoming homeless.
	Basis for Relative Priority	A core provision of the CDBG program is to provide Public Services to the Tustin community. Improving access to these services is a high priority of the City of Tustin. This need is additionally demonstrated by the state and region's historic homelessness crisis. The state of California represents roughly one-tenth of the nation's population but has over 25% of the nation's individuals currently experiencing homelessness.
7	Priority Need Name	Neighborhood Revitalization
	Priority Level	Low
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	CDBG Low/Mod Census Tract Target Area
	Associated Goals	Neighborhood Revitalization
	Description	Address public health and safety concerns associated with Code Enforcement activities, abandoned buildings or areas with blight.
	Basis for Relative Priority	Property maintenance issues are of significant importance to the community as the majority of residential, commercial, and industrial structures in the target area are at least 25 years in age. Active Code Enforcement is needed to ensure that properties are properly maintained in accordance with City standards.
8	Priority Need Name	Support Programs through Program Administration

Priority Level	Low
Population	Extremely Low Low Moderate
Geographic Areas Affected	Citywide
Associated Goals	Support Programs through Program Administration
Description	Ensure the management of a compliant and efficient CDBG program.
Basis for Relative Priority	The need for staff to carry out the grant program activities is critical. The city may use external parties such as consultants and subrecipients. Affirmatively further fair housing throughout the City by providing guidance and assistance to residents to increase their awareness of fair housing rights and support residents reporting fair housing issues and seek corrective action. The cap for planning and administrative activities is 20 percent of the grant.

Narrative (Optional)

A "low" priority designation does not mean a need is unimportant or invalid. Rather, it indicates that, given the City's limited CDBG funding, these needs have been determined to be a lower priority for resource allocation.

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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)	The City of Tustin does not utilize HOME funds for Tenant Based Rental Assistance. Rental assistance via Section 8 Vouchers are provided to Tustin residents through the Orange County Housing Authority.
TBRA for Non-Homeless Special Needs	See response above; TBRA provided through the Orange County Housing Authority.
New Unit Production	As documented in the Needs Assessment and Market Analysis, the need for affordable housing is high throughout Tustin. The City will continue to research resources to serve as leverage for the development and construction of new affordable housing throughout the City.
Rehabilitation	The City intends to invest CDBG funds in the Housing Rehabilitation Program as a cost-effective means of preserving the supply of homeowner housing. Rehabilitation programs will also enable the City to prioritize the preservation of older housing stock that is at a greater risk of falling into disrepair.
Acquisition, including preservation	The City will continue to leverage HUD resources as applicable, to prioritize the preservation of existing affordable housing in the City. When possible, the City will use resources and other federal and local resources to prioritize the preservation of these units. Preserving existing affordable housing is critical to maintaining a robust affordable housing stock in the City.

Table 49 – Influence of Market Conditions

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

Introduction

There are several potential funding sources that could help the City of Tustin address its housing and community development priorities, as well as the specific objectives outlined in the Strategic Plan component of the Consolidated Plan. However, due to reduced levels of State and federal funding compared to previous years, the financial resources currently available to the City are somewhat limited. Despite these challenges, the City will continue to seek additional funding opportunities throughout the fiscal year.

The City's goal is to maximize the use of available federal, State, and local funds to build a thriving community, create new affordable housing opportunities, and maintain and preserve existing housing. Section SP-45 (Goals Summary) of the Consolidated Plan includes the City's estimates for CDBG and General Fund allocations to support each goal.

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	725,229	0	0	725,229	2,800,000	CDBG Funding will be used to assist Low/Mod income residents through services and projects within the CDBG Low/Mod Census Tract Target Area.

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: \$		
General Fund	public - local	Economic Development Housing Public Improvements Public Services	1,000,000	0	0	1,000,000	4,000,000	General Fund monies will be used to address high priority needs not covered by CDBG funding and/or leveraged to assist with projects not fully-funded by CDBG. General Fund estimates to be provided on a project-specific basis.

Table 50 - 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

CDBG funding will be used to provide services to low/mod income persons, the special needs community, economic development, and address slum and blight within the CDBG low/mod census tract target area. CDBG funds are leveraged with the City's general funds to accomplish projects such as park improvements, street improvements, or other public facilities work. General fund estimates will be provided on a project-specific basis.

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 City of Tustin does not have any public housing units.

Discussion

No further discussion regarding anticipated resources at this time.

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
Boys & Girls Clubs of Tustin	Subrecipient	Non-homeless special needs public services	Jurisdiction
Meals on Wheels - Orange County	Subrecipient	Non-homeless special needs public services	Region
Mercy House	Subrecipient	Homelessness	Region
Olive Crest Treatment Centers, Inc.	Non-profit organizations	Homelessness	Region
Laurel House	Non-profit organizations	Homelessness	Jurisdiction
Human Options, Inc.	Subrecipient	Homelessness	Jurisdiction
Fair Housing Foundation	Subrecipient	Planning	Jurisdiction
Orange County Housing Authority	Public institution	Ownership Rental	Region
Orange County Health Care Agency	Public institution	public services	Region
Community Health Initiative of Orange County	Subrecipient	Non-homeless special needs public services	Region
Families Forward	Subrecipient	Homelessness public services	Region
Goodwill of Orange County	Subrecipient	Homelessness Non-homeless special needs public services	Region
OC Gateway to Housing	Subrecipient	Homelessness Rental public services	Region
Patriots & Paws	Subrecipient	Homelessness public services	Region
MOMS Orange County	Subrecipient	Non-homeless special needs public services	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Veterans Legal Institute	Subrecipient	Homelessness public services	Region
YMCA of Orange County	Subrecipient	Non-homeless special needs public services	Region
Regional Center of Orange County	Non-profit organizations	Non-homeless special needs	Region

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

In its current configuration, the City's institutional structure is well balanced in offering opportunities to various agencies and organizations. The City actively encourages a system for sharing resources and information through networking with other organizations such as federal, state, county, and local non-profit agencies. The current listing reflects several agencies who are receiving CDBG funding for at least the duration of the 2024-25 funding cycle and thus will be providing services to Tustin residents, as well as agencies who provide additional services and/or homeless services to the community such as the Orange County Housing Authority, Mercy House, Laurel House, Olive Crest and Orange County Health Care Agency.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X	X	
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	X

Healthcare	X	X	X
HIV/AIDS	X	X	
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			

Table 52 - 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 City of Tustin offers a variety of resources to support homeless individuals, including organizations such as the Orange County Rescue Mission, Village of Hope, Tustin Family Campus, Tustin Emergency Shelter, Human Options, Mercy House, Olive Crest, Families Forward, Family Promise of Orange County, Orange County Gateway to Housing, and Laurel House. These services encompass supportive housing, transitional housing, and emergency shelters, including those dedicated to abused women and children.

Additionally, the Orange County Public Health Care Agency provides comprehensive services for individuals living with HIV/AIDS. These services include case management, dental care, food assistance, HIV housing support, partner services, prevention and education, HIV testing, hotlines, legal assistance, medical care, mental health support, substance abuse resources, and transportation services.

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 City of Tustin works in partnership with local, county, state, and federal organizations to address service gaps and ensure an effective delivery system for individuals with special needs and those experiencing homelessness. This includes senior services provided by the Tustin Area Senior Center and Meals on Wheels Orange County, as well as support for individuals with disabilities through the Orange County Health Care Agency and Regional Centers of Orange County.

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

The City of Tustin overcomes its largest gap in delivery of programs with its recognition as an entitlement City. This enables the City to implement programs that previously went unfunded or underfunded.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affirmatively Further Fair Housing	2025	2029	Non-Housing Community Development	City of Tustin	Promote Fair Housing	CDBG: \$80,000	Other: 500 Other
2	Expand Affordable Housing Opportunities	2025	2029	Affordable Housing	City of Tustin	Preserve/Increase the Supply of Affordable Housing	CDBG: \$800,000	Homeowner Housing Rehabilitated: 40 Household Housing Unit
3	Support Community Services	2025	2029	Non-Housing Community Development	City of Tustin	Support Community Services	CDBG: \$370,449	Public service activities other than Low/Moderate Income Housing Benefit: 2275 Persons Assisted Homelessness Prevention: 5000 Persons Assisted
4	Improve Public Facilities and Infrastructure	2025	2029	Non-Housing Community Development	CDBG Low/Mod Census Tract Target Area	Enhance Public Facilities and Infrastructure	CDBG: \$1,000,000	Other: 3 Other
5	Support Economic Development	2025	2029	Non-Housing Community Development	City of Tustin	Promote Economic Development	CDBG: \$0	Businesses assisted: 0 Businesses Assisted
6	Support Efforts to Address Homelessness	2025	2029	Homeless	City of Tustin	Support Efforts to Address Homelessness	CDBG: \$334,780	Homelessness Prevention: 800 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Neighborhood Revitalization	2025	2029	Non-Housing Community Development	CDBG Low/Mod Census Tract Target Area	Neighborhood Revitalization	CDBG: \$440,000	Housing Code Enforcement/Foreclosed Property Care: 800 Household Housing Unit
8	Support Programs through Program Administration	2025	2029	Non-Housing Community Development	City of Tustin	Support Programs through Program Administration	CDBG: \$500,000	Other: 5 Other

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Affirmatively Further Fair Housing
	Goal Description	Provide ongoing assistance to combat discrimination through the promotion of fair housing education, legal representation, local support for affordable housing development projects, and counseling and financial training services. Affirmatively further fair housing throughout the City by providing guidance and assistance to residents to increase their awareness of fair housing rights and support residents reporting fair housing issues and seek corrective action.
2	Goal Name	Expand Affordable Housing Opportunities
	Goal Description	Provide programs to rehabilitate housing units, work with for-profit and non-profit developers to build new affordable housing units, acquire land for affordable housing projects, keep affordable housing programs; offer financial assistance for homebuyer and rental assistance programs.
3	Goal Name	Support Community Services
	Goal Description	Many challenges are faced by the City’s vulnerable populations (including low- and moderate-income residents as well as special needs populations) and they do not have regular access to critical services and programs such as youth programming, job training, transportation, legal services, fair housing services, senior programming, medical care, and other social services.

4	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	Tustin has a continuing need to maintain and enhance existing public facilities and infrastructures such as community centers, parks, streets, sidewalks, alleys, and other facilities and infrastructure in the City. These needs include ensuring that public facilities are ADA accessible to ensure access for all residents.
5	Goal Name	Support Economic Development
	Goal Description	Develop and strengthen small businesses, support local entrepreneurs, expand employment and/or workforce development programs, and improve access to job opportunities.
6	Goal Name	Support Efforts to Address Homelessness
	Goal Description	Provide a continuum of supportive and housing services for the homeless and households at risk of homelessness. This goal involves transitional housing, emergency housing, homeless prevention, and services for at-risk homeless and homeless veterans.
7	Goal Name	Neighborhood Revitalization
	Goal Description	Ensuring Code compliance and eliminating slum and blight within the CDBG Low/Moderate Census Tract Target area. Address public health and safety concerns associated with abandoned buildings or areas with blight.
8	Goal Name	Support Programs through Program Administration
	Goal Description	Ensure the management of a compliant and efficient CDBG program, including provision of Fair Housing services to Tustin residents.

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)

The City of Tustin does not utilize HOME funding.

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)

The City of Tustin does not have any public housing units, nor does the Orange County Housing Authority (OCHA) maintain this type of dwelling unit inventory, as it is defined by HUD regulations. However, the City participates in OCHA's tenant-based Section 8 program and maintains other types of assisted housing inventory. Currently, there are 425 Tustin households receiving Section 8 certificates and vouchers through OCHA.

Activities to Increase Resident Involvements

Not applicable.

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

N/A

Plan to remove the 'troubled' designation

Not applicable to the City of Tustin.

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

Barriers to Affordable Housing

As outlined by the Consolidated Plan regulations, a barrier to affordable housing is any public policy, including land use controls, property taxes, zoning ordinances, building codes, fees and charges, growth limits, and other related policies. These barriers arise when incentives for developing affordable housing are diminished due to excessive development costs or a lack of community support. While some development costs are influenced by economic conditions and other market factors beyond local government control, the development of affordable housing is also impacted by federal, state, and local housing policies, as well as the "Not In My Backyard" (NIMBY) attitude.

Although federal and state environmental regulations are enforced locally, these policies have contributed and may continue to contribute to increased development costs.

- » Land use development
- » Labor and material costs
- » Land costs
- » Environmental challenges (such as wastewater, floodplains, and capacity issues)
- » Deed restrictions and covenants

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

As stated in the Consolidated Plan, the City has adopted indirect assistance programs to address negative impacts created by barriers to affordable housing. The programs listed below are identified as the means by which the City of Tustin will address barriers to affordable housing:

- » Second Units
- » Deed Restrictions
- » Fees, Extractions, and Permit Procedures
- » Environmental Constraints
- » Pre-application Conferences
- » Shared Housing
- » Permit Processing and Coordination
- » Section 8 Rental Assistance
- » Housing Referral Program
- » Density Bonus Program
- » Mixed Use Zoning

SP-60 Homelessness Strategy – 91.215(d)

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

Available statistics currently indicate that the City of Tustin has 26 percent of its homeless population which is unsheltered. The City of Tustin is directly assisting the unsheltered homeless population within Tustin through the collaboration between the Tustin Police Department, CityNet, Orange County Health Care Agency (PERT Mental Health Services), Orange County Rescue Mission, and the Tustin-based nonprofit Operation Warm Wishes, to provide resources and services to the transient homeless in Tustin.

It should additionally be noted, that in March 2019, the City of Tustin opened a new low-barrier temporary homeless shelter with 77 emergency shelter beds for men, women, and families with children. This facility is operated by Temporary Shelter, Inc., and includes a variety of wrap-around and other supportive services to be administered at the site. This site is being established to ensure that unsheltered homeless individuals with ties to Tustin have the opportunity to be provided with a bed and shelter.

The City of Tustin recognizes that homelessness is a regional issue which needs to be addressed by all jurisdictions regardless of individual circumstances. The City identifies the Homeless Accommodation Plan, established for the Tustin Legacy Specific Plan area (formally MCAS Tustin Specific Plan area), as one of the strategies to address homelessness. The Homeless Accommodation Plan provides assistance for supportive housing and supportive services to help homeless persons and families transition from homelessness to living as independently as possible. The plan includes 387 beds at the Village of Hope facility to assist in the movement of homeless individuals and families to permanent housing within 24 months, and supportive services designed to address the special needs of homeless persons. Other homeless service providers operating in the Tustin Legacy Specific Plan area (formally MCAS Tustin Specific Plan area) are the Orange County Social Services Tustin Family Campus, Salvation Army, Orange Coast Interfaith, Families Forward, Human Options and, Temporary Shelter, Inc.

The City has developed a strategy that will continue to refer homeless persons and homeless families with children to service agencies and organizations. Through financial contributions, the City will support agencies which provide shelter and other services to the homeless.

Addressing the emergency and transitional housing needs of homeless persons

Emergency shelter and transitional housing needs for the City of Tustin's homeless population is addressed through the County of Orange's Continuum of Care Program.

The Orange County Continuum of Care (CoC) system consists of five basic components:

1. Advocacy on behalf of those who are homeless or at-risk of becoming homeless and to ensure social justice is maintained for all residents regardless of socio-economic status;

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 referral to necessary service providers or housing finders;
4. Transitional housing with appropriate supportive services to help those homeless individuals and families who are not prepared to make the transition to permanent housing and independent living; and
5. Permanent housing, or permanent supportive housing, to help meet the long-term needs of homeless individuals and families.

The City of Tustin and Orange County Rescue Mission executed a ground lease to support the Rescue Mission's construction/rehabilitation of a 5.1 acre site to establish a 192-unit emergency and transitional housing project at the former MCAS Tustin. The Village of Hope has also increased their transitional housing capacity to 387 beds, an increase of 195 beds. This emergency and transitional housing facility is currently in operation.

Please refer to the description (see question above) of the new low-barrier homeless shelter which has opened in Tustin and will be an asset to homeless within the community.

The City is also working to expand transitional housing options through the recent opening of the "House of Ruth" project by HomeAid Orange County in partnership with Family Promise of Orange County. This project consists of a newly constructed seven-unit facility and family resource center, designed to provide housing and support services to families with children who are experiencing homelessness or at risk of homelessness.

With respect to both emergency shelter and transitional housing needs addressed during 2025-2029 Consolidated Plan cycle, the City will allocate CDBG funds to: Families Forward Transitional Housing Program; OC Gateway to Housing's Bridge Housing Program and, Human Options Third Step Transitional Housing Program; Mercy House Family Care Center.

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 Homeless Housing Partnership program provides assistance for supportive housing and supportive services to help homeless persons and families transition from homelessness to living as independently as possible. The Homeless Housing Partnership Program includes 192 transitional housing units at the Village of Hope campus (operated by the Orange County Rescue Mission) to facilitate the movement of

homeless individuals and families to permanent housing within 24 months and supportive services designed to address the special needs of homeless persons.

The City recognized that the homeless are often in need of low rent or subsidized housing in order to make the transition to independent living. The Orange County Housing Authority will continue to assist homeless persons on the Section 8 waiting list. CDBG funding has been allocated to Goodwill of Orange County to provide emergency funding grants to veterans and their families on the verge of homelessness. The program administered by Goodwill of Orange County has the potential to keep veterans and their families housed, where they would otherwise become homeless without the assistance provided by the program. An additional homeless/at-risk homeless veterans' service has been provided in the past through Veterans Legal Institute, in which pro bono legal services will be provided to assist these veterans. Regardless of CDBG funding allocated to these specific program(s), they continue to provide support for Tustin residents throughout the community. Further efforts to help the homeless not funded by CDBG include additional programming from local nonprofits and churches.

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

The following strategy not only addresses the City of Tustin's efforts to assist individuals and families in avoiding becoming homeless, but addresses the overall strategy for assisting the homeless with individual needs, transitional housing needs, and permanent housing needs. The strategy addresses the following:

1. Helping low-income families avoid becoming homeless.
2. Reaching out to homeless persons and assessing their individual needs.
3. Addressing the emergency shelter and transitional housing needs of homeless persons.
4. Helping homeless persons make the transition to permanent housing and independent living.

The City of Tustin will meet these needs of homeless persons and homeless families with children through the following strategies:

1. Continue to refer homeless persons and homeless families with children to service agencies and organizations;
2. Support agencies which provide shelter and other services to the homeless through financial contributions funded through the CDBG Program.
3. Provide for and support the establishment of a homeless accommodation strategy in the reuse of Marine Corps Air Station, Tustin. The City of Tustin has prepared a Reuse/Specific Plan for Marine Corps Air Station (MCAS) Tustin, which was closed July 1999. The Reuse Plan provides the following fundamental guiding principles:

- a. Coordination and cooperation among the Cities of Tustin and Irvine, support service providers, school districts and advocates for the homeless should be promoted.
- b. Creating a program and service system separate from the mainstream is inefficient and not consistent with the concept of breaking the cycle of homelessness.
- c. Established public and private providers should be used for delivery on-site or off-site (by contracting and visiting clinical personnel) of certain program and services. This should be the preferred approach and will assist in the streamlining and consolidation of existing programs.
- d. Linkages with job-training, employment and education should be encouraged.

As stated above, the City of Tustin participates in the County of Orange Continuum of Care process and the Association of California Cities – Orange County’s Homelessness Task Force. Through this process the City is able to keep current with the region’s homeless shelter and service needs. Additionally, through its partnership with the Orange County Housing Authority (OCHA), Tustin renter households have access to OCHA’s Family Self-Sufficiency Program. Preference for this program is given to families with children who are homeless or who are in danger of becoming homeless (those paying over 50 percent of household income for rent). In addition to providing housing assistance, this program provides a variety of support services designed to assist participants become economically independent including job training and employment for program participants.

Tustin has allocated the maximum allowable amount of its CDBG funds to public service programs. While some of the organizations funded do not directly serve the homeless, many of their activities may help prevent homelessness. These activities include counseling programs for victims of domestic violence, at-risk youth, veterans services, family and infant care, and youth services.

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

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

In Orange County, lead poisoning is addressed by the Orange County Health Care Agency Public Health Services' Lead Poisoning Prevention Program. The Lead Poisoning Prevention Program provides services to the community to increase awareness of lead hazards, and provides resources to parents, medical providers, homeowners, contractors, and workers.

According to 2016 – 2020 ACS data, approximately 6,140 owner-occupied and 7,210 renter-occupied housing units within the City of Tustin were constructed before 1980 and have the potential to contain lead-based paint. With the potential for lead-based paint hazards, the City will utilize a Lead Hazards Review Worksheet which demonstrates compliance with HUD's Lead Safe Housing Rule found within 24 CFR Part 35, and will work with contractors to identify and address lead-based paint hazards in federally-funded housing rehabilitation projects. Where disturbed paint is observed, or if paint will be disturbed as part of the rehabilitation activities, the City will provide interim controls where lead-based paint is found. In order to further efforts to reduce lead-based paint hazards, the City will continue to seek partnerships with organizations such as the Orange County Public Health Care Agency Public Services.

To additionally address the potential threat of lead-based paint within homes in Tustin, the City will implement into its housing policies over the next five years the following:

- » Include lead-based paint hazard reduction as an eligible rehabilitation activity through the City's CDBG grant program.
- » Review existing regulations, housing and rehabilitation codes to assure lead-based paint hazard reduction is incorporated.
- » Require testing and hazard reduction in conjunction with rehabilitation.
- » Require inspections for lead at appropriate times when housing is otherwise being inspected or evaluated.
- » Removal of lead-based paint is also a priority health-safety initiative within the City of Tustin's Home Repair Program.

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

Older housing is more likely to have lead-based paint, and the amount of lead pigment in the paint tends to increase with the age of the housing. Nearly half of Tustin's owner-occupied housing stock (53%) and 46% of all renter-occupied housing stock was built after 1980, when the use of lead-based paint was outlawed, eliminating the risk of lead-based paint hazards for residents of these homes. The properties most at risk are those with deteriorated units, particularly those with leaky roofs and plumbing. It can also be assumed that lower income households often occupy older, lower cost housing units, and residents occupying older housing units experience the highest incidence of lead-based poisoning. Rental units built before 1980 constitute 56% of the rental housing stock within the City of Tustin, and are considered an

area of focus for lead-based paint identification and reduction in federally-funded housing rehabilitation projects.

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

When federal 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.

To additionally address the potential threat of lead-based paint within homes in Tustin, the City will implement into its housing policies over the next five years the following:

- » Include lead-based paint hazard reduction as an eligible rehabilitation activity through the City's CDBG grant program (specifically the Home Repair Program).
- » Review existing regulations, housing and rehabilitation codes to assure lead-based paint hazard reduction is incorporated.
- » Require testing and hazard reduction in conjunction with rehabilitation.
- » Require inspections for lead at appropriate times when housing is otherwise being inspected or evaluated.

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

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

The City of Tustin does not have a formally adopted Anti-Poverty Strategy. However, the City's Housing Element includes several goals, policies and programs designed to provide adequate, safe and affordable housing for all segments of the population. Four of the five goals within the Housing Element deal with ensuring that housing is affordable to all segments of the City's population. The City has adopted corresponding policies and programs to implement the strategies. Appendix D includes the Housing Element Goals and Policies which serves as the City of Tustin's Anti-Poverty Goals and Policies.

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

Tustin is and will continue to be home to persons requiring a variety of housing options. At different stages in their lives, people require different housing arrangements. Additionally, the City must respond to the housing needs of all economic segments of the community and ensure that housing discrimination does not serve as a barrier to housing in Tustin. It is also important that the City maintain a balance of housing types and that the City's housing stock is not overly skewed towards the provision of one type of housing. Finally, the continuing need for low income housing in the region requires the City attempt to preserve low-income housing units that are at risk of converting to other uses.

Anti-Poverty Goals and Policies Part I

Goal 1: Provision of an adequate supply of housing to meet the need for a variety of housing types and the diverse socio-economic needs of all community residents commensurate with the City's identified housing needs in the RHNA allocation.

Policy 1.1: VARIETY OF HOUSING CHOICES - Provide site opportunities inventory of vacant and underutilized land for development of housing that responds to diverse community needs in terms of housing type, cost and location, emphasizing locations near services and transit.

Policy 1.2: ACCESSORY DWELLING UNITS – Facilitate the development of accessory dwelling units and junior accessory dwelling units as a means of dispersing affordable units throughout the community.

Policy 1.3: REGULATORY INCENTIVES – Support the use of regulatory incentives, such as density bonuses and deferment of impact fees, to offset the costs of affordable housing while ensuring that potential impacts are addressed.

Policy 1.4: DEVELOPMENT STREAMLINING - Initiate development permit and zoning code streamlining strategies to encourage and expedite residential development (i.e. accessory dwelling units, affordable housing units, and investments in existing buildings) to reduce and eliminate regulatory barriers.

Policy 1.5: SMART GROWTH PRINCIPLES - Encourage infill development or site redevelopment within feasible development sites for homeownership and rental units through the implementation of smart growth principles, allowing for the construction of higher density housing, affordable housing, and mixed-use development (the vertical and horizontal integration of commercial and residential uses) in proximity to employment opportunities, community facilities and services, and amenities.

Policy 1.6 FINANCIAL RESOURCES - Pursue grants and other funding opportunities that support the affordable homeownership and rental housing construction and housing rehabilitation for all segments of the population.

Policy 1.7: PARTNERSHIPS - Continue to implement best practices for developer selection, project underwriting and due diligence and partnerships for affordable housing developments that receive financial and other assistance to ensure long term viability of affordable housing and to ensure the maximized leverage of local resources.

Anti-Poverty Goals and Policies Part II

Goal 2: Promote fair housing opportunities for all people regardless of their special characteristics as protected under state and federal fair housing laws.

Policy 2.1: FAIR HOUSING - Affirmatively further fair housing by taking meaningful actions to combat discrimination, help overcome patterns of segregation, and foster equal housing opportunities for all within the Tustin community

Policy 2.2: HOMELESS HOUSING AND SERVICES – Support and expand housing and services that address the needs of the City’s homeless population.

Policy 2.3: HOUSING OPTIONS - Promote the dispersion and integration of housing for low- and very-low income families throughout the community.

Policy 2.4: SENIOR HOUSING – Support the development and maintenance of affordable senior rental and ownership housing and supportive services to facilitate maximum independence and the ability of seniors to remain in their homes and/or in the community.

Policy 2.5: SPECIAL NEEDS HOUSING - Encourage the availability of affordable housing for special needs households, including large, extremely- low and low-income families. Special needs households include the seniors, large families, female-headed households with children, households with persons with disabilities, and persons experiencing homelessness.

Policy 2.6: FAIR HOUSING PROTECTIONS – Promote fair housing opportunities by supporting the continuation of policies that require relocation assistance, and/or to provide incentives and assistance for purchase of the units by low- and moderate-income households

Anti-Poverty Goals and Policies Part III

Goal 3: Preserve and improve the existing housing supply and prevent displacement of existing tenants.

Policy 3.1: AFFORDABLE RENTAL HOUSING – Support efforts to conserve assisted rental units by work with property owners, tenants, and non-profits to facilitate the preservation of assisted rental housing at risk of conversion to market rate and promote rental assistance programs.

Policy 3.2: FINANCIAL RESOURCES - Pursue grants and other funding opportunities that support the preservation and expansion of affordable housing.

Anti-Poverty Goals and Policies Part IV

Goal 4: Conserve and improve the condition of the existing housing stock.

Policy 4.1: SUBSTANDARD HOUSING PREVENTION - Periodically evaluate housing conditions and, when appropriate, adjust the City’s community preservation programs to prevent and address any increase in deteriorated housing conditions.

Policy 4.2: COMMUNITY PRESERVATION - Continue the City’s community preservation efforts to enforce health, safety, and zoning codes to prevent and eliminate substandard housing conditions and address deferred maintenance, detrimental to the health, safety and welfare of residents.

Policy 4.3: HISTORIC RESOURCES - Promote the continued maintenance and preservation of City’s historically and architecturally significant residential resources.

Policy 4.4: ADAPTIVE REUSE – Encourage the adaptive reuse of historic resources to support 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

To ensure program compliance, the City conducts a regular on-site monitoring visit to each subrecipient. The City established this monitoring procedure to ensure that each subrecipient is carrying out the eligible activity, utilizing appropriate accounting methods, and verifying information provided to the City within the quarterly performance report. The on-site monitoring visit also provides the City with an opportunity to identify potential problem areas and to provide subrecipients with technical assistance as needed. The City utilizes a monitoring checklist form as a standard form to monitor the subrecipients.

In addition, all projects are monitored for compliance with all State and Federal requirements including, but not limited to, eligibility, environmental impacts and labor regulations.

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Expected Resources

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

Introduction

There are several potential funding sources that could help the City of Tustin address its housing and community development priorities, as well as the specific objectives outlined in the Strategic Plan component of the Consolidated Plan. However, due to reduced levels of State and federal funding compared to previous years, the financial resources currently available to the City are somewhat limited. Despite these challenges, the City will continue to seek additional funding opportunities throughout the fiscal year.

The City's goal is to maximize the use of available federal, State, and local funds to build a thriving community, create new affordable housing opportunities, and maintain and preserve existing housing. Section SP-45 (Goals Summary) of the Consolidated Plan includes the City's estimates for supporting each goal.

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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	725,229.00	0.00	0.00	725,229.00	2,900,916.00	CDBG Funding will be used to assist Low/Mod income residents through services and projects within the CDBG Low/Mod Census Tract Target Area.

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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: \$		
General Fund	public - local	Economic Development Housing Public Improvements Public Services	1,000,000.00	0.00	0.00	1,000,000.00	4,000,000.00	General Fund monies will be used to address high priority needs not covered by CDBG funding and/or leveraged to assist with projects not fully-funded by CDBG. General Fund estimates to be provided on a project-specific basis.

Table 54 - 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

CDBG funding will be used to provide services to low/mod income persons, the special needs community, economic development, and address slum and blight within the CDBG low/mod census tract target area. CDBG funds are leveraged with the City's general funds to accomplish projects such as park

improvements, street improvements, or other public facilities work. General fund estimates will be provided on a project-specific basis.

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 City of Tustin does not have any public housing units.

Discussion

No further discussion regarding anticipated resources at this time.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affirmatively Further Fair Housing	2020	2024	Non-Housing Community Development	City of Tustin	Promote Fair Housing	CDBG: \$16,000.00 General Fund: \$.00	Other: 100 Other
2	Expand Affordable Housing Opportunities	2020	2024	Affordable Housing	City of Tustin	Preserve/Increase the Supply of Affordable Housing	CDBG: \$160,000.00 General Fund: \$.00	Homeowner Housing Rehabilitated: 8 Household Housing Unit
3	Support Community Services	2020	2024	Non-Housing Community Development	City of Tustin	Support Community Services	CDBG: \$58,600.00 General Fund: \$.00	Public service activities other than Low/Moderate Income Housing Benefit: 455 Persons Assisted
4	Improve Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	CDBG Low/Mod Census Tract Target Area	Enhance Public Facilities and Infrastructure	CDBG: \$228,629.00 General Fund: \$.00	Other: 1 Other
5	Support Economic Development	2025	2029	Non-Housing Community Development	City of Tustin	Promote Economic Development	CDBG: \$.00	Businesses assisted: 0 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Support Efforts to Address Homelessness	2020	2024	Homeless	City of Tustin	Support Efforts to Address Homelessness	CDBG: \$50,000.00	Homelessness Prevention: 606 Persons Assisted
7	Neighborhood Revitalization	2020	2024	Non-Housing Community Development	City of Tustin	Neighborhood Revitalization	CDBG: \$88,000.00 General Fund: \$.00	Housing Code Enforcement/Foreclosed Property Care: 160 Household Housing Unit
8	Support Programs through Program Administration	2020	2024	Non-Housing Community Development	City of Tustin	Support Programs through Program Administration	CDBG: \$124,000.00 General Fund: \$.00	Other: 1 Other

Table 55 – Goals Summary

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Goal Descriptions

1	Goal Name	Affirmatively Further Fair Housing
	Goal Description	<p>Planning and administration programs include:</p> <ul style="list-style-type: none"> Fair Housing Activities– Tustin has distinct and independent policies and programs that affect housing development. From time to time the City will review these policies and programs and evaluate if modifications may be warranted to ensure the jurisdiction is affirmatively furthering fair housing. In addition, CDBG funds will be allocated to contract with the Fair Housing Foundation to provide fair housing services to Tustin residents. The Fair Housing Foundation activities during the 2025-26 reporting period will include: Fair Housing Community Education – Conduct fair housing community education presentations, publish and distribute fair housing newsletters, speak at public meetings, and hold training programs for consumers and housing industry professionals. Fair Housing Enforcement – Respond to housing discrimination complaints, including investigation and portfolio testing, to evaluate the merits of a fair housing claim, and if appropriate, conciliation and/or prosecution of meritorious housing discrimination cases. Tenant Legal Assistance – Provide legal assistance in court actions within the region, which involve important housing rights such as eviction, housing discrimination, substandard conditions, or retaliation for exercising a lawful right. Housing Dispute Evaluation & Resolution – Assist in evaluating housing issues/complaints. Mediation Program – Resolve disputes through certified mediators to assist housing providers/consumers to reach agreements about the disputes without litigation. <p>During the 2025-26 Program Year, the City of Tustin anticipates assisting 100 individuals.</p>

2	Goal Name	Expand Affordable Housing Opportunities
	Goal Description	<p>The City of Tustin's Economic Development/Tustin Housing Authority and the Community Development Department will continue to maintain a variety of affordable housing efforts for Tustin residents. These activities include the following:</p> <ul style="list-style-type: none"> • Home Repair Grant Program – The City of Tustin’s Home Repair Grant Program is designed to increase, improve, and preserve affordable housing using federal Community Development Block Grant (CDBG) funds. The Program provides grants for eligible home repairs to low- and moderate-income homeowners at or below 80% of the Area Median Income (AMI) as defined by the Department of Housing and Urban Development (HUD). Eligible activities include, but are not limited to, the repair, replacement, and/or installation of major systems including plumbing, heating, electrical, windows, roof, paint, and handicap accessibility. • Administration of Section 8 Housing- The City of Tustin Housing Division will continue to monitor Section 8 Housing vouchers administered by the County of Orange. There are currently 495 Tustin residents receiving such assistance through the County. <p>As stated, during the 2025-26 Program Year, the City of Tustin anticipates rehabilitating 8 housing units.</p>

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3	Goal Name	Support Community Services
	Goal Description	<p>Public Service activities to be funded by CDBG for the 2023-2025 (three-year funding cycle, 2025-26 is the last year of the cycle) include: Boys & Girls Clubs of Tustin - Upward Bound Academic Enrichment Program; Families Forward - Families Forward Rapid Re-Housing Program; Goodwill of Orange County - Emergency Funding Grants; Human Options - Third Step Program; and Meals on Wheels Orange County - Home Delivered Meal & Lunch Cafe Programs.</p> <p>Subrecipients that meet a general Public Service need such as healthcare services, referrals, and resources for at-risk homeless veterans include the following:</p> <ul style="list-style-type: none"> • MOMS Orange County – Healthy Beginnings Home Visitation Program - This program provides health care services to mothers and babies living in poverty. Monthly in-home visits and health screenings are conducted through the baby's first birthday with the goal of helping babies from vulnerable families reach developmental milestones on time, while equipping mothers and fathers for healthy parenting and family bonding. • Patriots and Paws Provisions for Patriots Program - This program provides clients with home goods using a conservative estimate for thrift store pricing. Clients include Tustin veterans, activity duty personnel, and reservists. By receiving assistance through the program, clients may reallocate their resources toward employment and self-sufficiency. • Meals on Wheels Orange County - Meals on Wheels Orange County provide a lunch cafe program for the elderly at a congregate meal site at the Tustin Area Senior Center, and through home delivery to the frail elderly who cannot leave the home. Funds are utilized to pay for meals related expenditures and raw food costs. • Boys & Girls Clubs of Tustin - CDBG funds will be used to support the Upward Bound Academic Enrichment Program which provides for the literacy and academic needs of at-risk youth in the southwest area of Tustin through computerized tutoring, homework help, and academic goal setting. <p>During the 2025-26 Program Year, the City anticipates serving 455 Tustin individuals through these programs.</p>

4	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	<p>The City’s CDBG target area was largely developed prior to its annexation by the City of Tustin; therefore, the area is comparatively limited in terms of park and recreational opportunities. The higher population density within the target area also contributes to the need for more recreational facilities. As a result, considerable attention has been focused on ways to provide additional, and to provide improvements to existing facilities, to provide increased and improved youth, adult, and senior services and facilities to supplement those which are heavily used at this time.</p> <p>Improvements to existing public facilities include but not limited to streets, sidewalks, storm-drains, curbs and gutters, and parks.</p> <p>During the 2025-26 Program Year the City of Tustin anticipates initiating one public facility improvement.</p>
5	Goal Name	Support Economic Development
	Goal Description	<p>Although CDBG funding has not been allocated to this goal during the 2025-26 program year, the City of Tustin will continue to use other available grant and funding sources to develop and strengthen small businesses, support local entrepreneurs, expand employment and/or workforce development programs, and improve access to job opportunities.</p>

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6	Goal Name	Support Efforts to Address Homelessness
	Goal Description	<p>This priority encourages activities which support the homeless, those at-risk of being homeless, and families in transition from homelessness to independent living, by providing emergency shelter and transitional housing accessibility, wrap-around and other referral services. Programs specifically funded by CDBG during the 2023-2025 (three-year funding cycle) include:</p> <ul style="list-style-type: none"> • Families Forward Housing Program - Families Forward will use CDBG funding to administer their Rapid Re-Housing Program which will transition struggling families in Tustin from crisis to stability and self-sufficiency. • Family Promise of OC - House of Ruth contains seven apartment-style short-term (i.e. transitional) housing units and a Community Resource Center to support families with children who are experiencing or at risk of homelessness. The housing units shelter homeless families with children, including larger families that cannot be accommodated by other programs. Families housed at House of Ruth offers weekly case management, therapy, career development, financial literacy training, credit repair assistance, housing navigation services, supplemental food, hygiene and childcare supplies, and linkages to social services. • Human Options - This transitional housing program provides low-cost housing and supportive services to increase client self-sufficiency for abused women and children. CDBG funding will be used for staff salaries and benefits. • Goodwill Industries of OC - Through this program grants will be provided to veterans and their families who are on the verge of becoming homeless. CDBG funding will be used to provide direct financial assistance to at-risk veterans. • Mary's Path - Will serve pregnant and parenting teen mothers from the foster care system. Teen mothers find dignity, learn self-sufficiency, and restore hope at Mary's Path by empowering teen mothers to regain control of their lives and create families that thrive. <p>Strategies for support of ancillary services to support the homeless include:</p> <ul style="list-style-type: none"> • Continue to operate the Tustin Emergency Shelter which provides 77 low-threshold emergency shelter beds for Tustin's homeless population. • Continue to support Orange County Social Services Agency programs in conjunction with the Tustin Family Campus for abused and neglected children. • Continued participation in the Homeless Housing Partnership Program, which includes partnership with the Orange County Rescue Mission's Village of Hope providing 262 beds within their transitional housing facility. The Village of Hope has additionally provided 8 units of transitional housing specifically for veterans through partnership with the City of Tustin. <p>During the 2025-26 Program Year, the City anticipates assisting approximately 606 individuals through these strategies to address homelessness.</p>

7	Goal Name	Neighborhood Revitalization
	Goal Description	<p>Property maintenance issues are of significant importance to the community as the majority of residential, commercial, and industrial structures in the target area are around 45 years in age having been built in the late 1960's and 1970's. Absentee property owners contributed to delayed property maintenance in many cases. Active Code Enforcement is needed to ensure that properties are properly maintained in accordance with City standards. Programs addressing code enforcement include:</p> <ul style="list-style-type: none"> • Code Enforcement – Provide community preservation services through the funding of a full-time Code Enforcement Officer who will work only with the CDBG Low/Moderate Income Target Area of the city. <p>During the 2025-26 Program Year, the City anticipates 160 Code Enforcement cases to be addressed within the CDBG Low/Moderate Income Census Tract Target Area.</p>
8	Goal Name	Support Programs through Program Administration
	Goal Description	<p>Planning services are needed to administer the CDBG program, to prepare planning documents, and to facilitate fair housing assistance - these services are necessary to support other Consolidated Plan priorities. Planning and administration programs include:</p> <ul style="list-style-type: none"> • Planning and Administration – CDBG funds will be allocated for City staff administration of the CDBG program. Funds may also be used to undertake specific plans with impact to the Low- and Moderate-income target area. <p>During the 2025-26 Program Year, the City of Tustin anticipates Administering one (1) Planning Activity.</p>

Projects

AP-35 Projects – 91.220(d)

Introduction

The City aims to maximize the use of available federal, state, and local funds to create a vibrant community, develop new affordable housing opportunities, and preserve existing housing. To ensure the financial viability of projects, the City will explore funding from other sources, including the Housing Authority's set-aside funds, to support affordable housing and community development goals whenever a match, grant, or loan is needed or appropriate. The City will continue to allocate CDBG funds to projects within the CDBG Low/Moderate Census Tract Target Area or those that directly benefit low- and moderate-income residents.

To address the underserved needs of the community, the City will collaborate with federal, state, and local agencies to provide necessary assistance to residents; work with public service providers to ensure adequate services; and focus on physical improvements in slum and blighted areas, particularly within the CDBG Low/Moderate Census Tract Target Area.

Projects

#	Project Name
1	Boys & Girls Clubs of Tustin
2	Families Forward
3	Family Promise
4	Goodwill of Orange County
5	Human Options
6	Mary's Path
7	Meals on Wheels Orange County
8	MOMS Orange County
9	Patriots & Paws
10	Residential Rehabilitation Program
11	Tustin Family & Youth Center Playground Renovation
12	Code Enforcement
13	CDBG Program Administration
14	Fair Housing Services
15	Emergency Response Funding

Table 56 – Project Information

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

The City's goal is to fully leverage available federal, state, and local funds to create a vibrant community, expand affordable housing opportunities, and preserve existing housing. To ensure the financial feasibility

of projects, the City will explore funding from other sources, such as the Housing Authority's set-aside funds, to support affordable housing and community development objectives when a match, grant, or loan is necessary or appropriate. The City will continue to direct its CDBG funding toward projects within the CDBG Low/Moderate Census Tract Target Area or those that directly benefit low- and moderate-income residents.

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AP-38 Project Summary

Project Summary Information

1	Project Name	Boys & Girls Clubs of Tustin
	Target Area	City of Tustin
	Goals Supported	Support Community Services
	Needs Addressed	Support Community Services
	Funding	CDBG: \$18,000.00
	Description	Upward Bound Academic Enrichment Program, a program of services to provide and teach: academic, social, and character development needs of at-risk youth in the southwest area of the City of Tustin.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	100 Tustin youth per year.
	Location Description	Boys & Girls Clubs of Tustin located at 580 W. Sixth Street, Tustin, CA 92780.
	Planned Activities	Funding to support the Upward Bound Academic Enrichment Program which provides for the literacy and academic needs of at-risk youth in the southwest area of Tustin through computerized tutoring, homework help, and academic goal setting.
2	Project Name	Families Forward
	Target Area	City of Tustin
	Goals Supported	Support Efforts to Address Homelessness
	Needs Addressed	Support Efforts to Address Homelessness
	Funding	CDBG: \$18,000.00
	Description	Families Forward Housing Program- Rapid Re-housing: A program which will provide rapid re-housing services including individualized support and accountability to homeless parents working to locate housing, improve financial stability, and create a sustainable future for their children.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	45 Tustin residents per year.
	Location Description	Program and services to be administered out of the Families Forward offices at 8 Thomas Avenue, Irvine, CA 92618.
	Planned Activities	Funding for staff salaries to administer a rapid re-housing program which will provide rapid re-housing services including individualized support and accountability to homeless parents working to locate housing, improve financial stability, and create a sustainable future for their children.
3	Project Name	Family Promise
	Target Area	City of Tustin
	Goals Supported	Support Efforts to Address Homelessness
	Needs Addressed	Support Efforts to Address Homelessness
	Funding	CDBG: \$8,000.00
	Description	Funding for both the Emergency Shelter and Transitional Housing Programs which includes salaries of the Case Managers/Social Workers, a van driver, payroll taxes, and expenses and food for the families served.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	480 Tustin residents per year.
	Location Description	1941 El Camino Real Tustin, CA 92780
Planned Activities	Serve Tustin residents through both the emergency shelter and transitional housing programs.	
4	Project Name	Goodwill of Orange County
	Target Area	City of Tustin
	Goals Supported	Support Efforts to Address Homelessness
	Needs Addressed	Support Efforts to Address Homelessness
	Funding	CDBG: \$8,000.00

	Description	To facilitate and manage emergency funding grants which would address the immediate and critical needs of veterans and their families, focusing on veterans on the verge of homelessness.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	30 at-risk Tustin Veterans per year.
	Location Description	Program administered out of the Tierney Center for Veteran Services located at 1231 Warner Avenue, Tustin, CA 92780.
	Planned Activities	Funding to be utilized to facilitate and manage emergency funding grants which would address the immediate and critical needs of veterans and their families, focusing on veterans on the verge of homelessness.
5	Project Name	Human Options
	Target Area	City of Tustin
	Goals Supported	Support Efforts to Address Homelessness
	Needs Addressed	Support Efforts to Address Homelessness
	Funding	CDBG: \$8,000.00
	Description	Third Step Program: A transitional housing program, which provides low-cost housing and supportive services to increase client self-sufficiency for abused women and children. Supportive services include case management, financial literacy, employment workshops, legal advocacy, and counseling.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	6 Tustin Residents per year.
	Location Description	Transitional housing units located at confidential addresses throughout Tustin. Program office address: P.O. Box 53745 Irvine, CA 92619.
Planned Activities	Staff salary, benefit, and administrative costs for a transitional housing program, which provides low-cost housing and supportive services to increase client self-sufficiency for abused women and children. Supportive services include case management, financial literacy, employment workshops, legal advocacy, or counseling.	

6	Project Name	Mary's Path
	Target Area	City of Tustin
	Goals Supported	Support Efforts to Address Homelessness
	Needs Addressed	Support Efforts to Address Homelessness
	Funding	CDBG: \$8,000.00
	Description	Mary's Path's overarching goal and purpose is to ensure that teen moms from the foster system who have suffered adverse traumatic experiences such as sex trafficking, homelessness, poverty, and domestic violence are safe and stable in their housing.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	45 teen moms/babies per year.
	Location Description	18221 East 17th Street, Santa Ana, CA 92705.
	Planned Activities	Mary's Path's overarching goal and purpose is to ensure that teen moms from the foster system who have suffered adverse traumatic experiences such as sex trafficking, homelessness, poverty, and domestic violence are safe and stable in their housing. Mary's Path equips these teens with the skills and resources that they need to successfully transition to independent living as healthy, happy, and productive members of their communities.
7	Project Name	Meals on Wheels Orange County
	Target Area	City of Tustin
	Goals Supported	Support Community Services
	Needs Addressed	Support Community Services
	Funding	CDBG: \$24,600.00
	Description	To provide a lunch program for elderly persons at a Lunch Cafe Program (congregate meal program) at the Tustin Area Senior Center, located at 200South C Street and through home delivery.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	20 Tustin seniors (Home Delivered Meal Program) & 125 Tustin seniors (Lunch Cafe Program) per year.

	Location Description	Lunch Cafe Program administered out of the Tustin Area Senior Center located at 200 S. C Street, Tustin, CA 92780. Home Delivered Meal Program meals are delivered directly to the homes of Tustin seniors.
	Planned Activities	Lunch Cafe Program for the elderly at a congregate meal site (Tustin Area Senior Center), and through home delivery. Funds will be utilized to pay for meal-related expenditures, and raw food costs.
8	Project Name	MOMS Orange County
	Target Area	City of Tustin
	Goals Supported	Support Community Services
	Needs Addressed	Support Community Services
	Funding	CDBG: \$8,000.00
	Description	Infant Development Program: Health Care services for mothers and babies living in poverty. Monthly in-home visits and health screenings are conducted from birth through 13 months with the goal to help babies from vulnerable families reach developmental milestones on time, while equipping mothers and fathers for healthy parenting and family bonding.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	185 Tustin mothers and/or babies per year.
	Location Description	Activities carried out within the homes of families throughout Tustin via home- visitation services.
	Planned Activities	Funding to provide health care services for mothers and babies living in poverty. Monthly in-home visits and health screenings are conducted through the baby's first birthday, with the goal to help babies from vulnerable families reach developmental milestones on time, while equipping mothers and fathers for healthy parenting and family bonding.
9	Project Name	Patriots & Paws
	Target Area	City of Tustin
	Goals Supported	Support Community Services
	Needs Addressed	Support Community Services
	Funding	CDBG: \$8,000.00

	Description	The Provisions for Patriots program, which provides clients with home goods using a conservative estimate for thrift store pricing. Clients include Tustin veterans, active-duty personnel, and reservists. By receiving assistance through the program, clients may reallocate their resources toward employment and self-sufficiency.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	25 Tustin veterans per year.
	Location Description	Program administered out of the donation site located at 1825 E. Via Burton, Anaheim, CA 92806. Deliveries made to various homes of Tustin residents.
	Planned Activities	Funding for the Provisions for Patriots Program, which provides clients with home goods using a conservative estimate for thrift store pricing. Clients include Tustin veterans, active-duty personnel, and reservists. By receiving assistance through the program, clients may reallocate their resources toward employment and self-sufficiency.
10	Project Name	Residential Rehabilitation Program
	Target Area	City of Tustin
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Preserve/Increase the Supply of Affordable Housing
	Funding	CDBG: \$160,000.00
	Description	The Program utilizes CDBG funds to provide eligible households with grants to address municipal code violations, repair, replace, and/or install major systems of the home. Upon approval of a property owner's application for funding, the City shall provide grant funding to pay for pre-determined and agreed upon rehabilitation work.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	8 low-income households.
	Location Description	TBD

	Planned Activities	The Program utilizes CDBG funds to provide eligible households with grants to address municipal code violations, repair, replace, and/or install major systems of the home. Upon approval of a property owner’s application for funding, the City shall provide grant funding to pay for pre-determined and agreed upon rehabilitation work.
11	Project Name	Tustin Family & Youth Center Playground Renovation
	Target Area	CDBG Low/Mod Census Tract Target Area
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Enhance Public Facilities and Infrastructure
	Funding	CDBG: \$228,629.00
	Description	The public improvements will take place at Tustin Family and Youth Center.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	1 Project. 2000 children benefitted annually.
	Location Description	Tustin Family and Youth Center
	Planned Activities	Renovate the existing outdated playground to create a multi-use play space that provides more options for children based on the activities they prefer. Specifically introducing a small soccer field/basketball court with perimeter netting. In addition the design includes a small climbing gym with shade, and 1-2 smaller play structures for pre-K aged children.
12	Project Name	Code Enforcement
	Target Area	CDBG Low/Mod Census Tract Target Area
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$88,000.00
	Description	Provide community preservation services through the funding of a full-time Code Enforcement Officer who will work only with the CDBG Low/Moderate Income Target Area of the city.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	Estimated that 100 code cases will be completed annually.
	Location Description	Citywide benefit; however, CDBG funds only used for Code Enforcement activities within the CDBG Low/Moderate Census Tract Target Area.
	Planned Activities	Provide community preservation services through the funding of a full-time Code Enforcement Officer who will work only with the CDBG Low/Moderate Income Target Area of the city.
13	Project Name	CDBG Program Administration
	Target Area	City of Tustin
	Goals Supported	Support Programs through Program Administration
	Needs Addressed	Support Programs through Program Administration
	Funding	CDBG: \$124,000.00
	Description	Funding for program oversight, coordination, and compliance.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Program administration occurs out of Tustin City Hall located at 300 Centennial Way, Tustin, CA 92780.
Planned Activities	Funding for program oversight, coordination, and compliance.	
14	Project Name	Fair Housing Services
	Target Area	City of Tustin
	Goals Supported	Affirmatively Further Fair Housing
	Needs Addressed	Promote Fair Housing
	Funding	CDBG: \$16,000.00
	Description	Providing counseling services related to housing complaints, outreach activities, legal services, and fair housing education seminars.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 600 Tustin residents will be reached through the variety of services provided by Fair Housing Foundation including counseling, outreach events, workshops, and informational materials distribution.
	Location Description	Fair Housing cases handled in their main office at: 3605 Long Beach Blvd. #302, Long Beach, CA 90807. Fair Housing workshops and events are held virtually and at the Tustin Library, 345 E. Main Street, Tustin, CA 92780.
	Planned Activities	The program provides education, counseling and enforcement services predominately to but not limited to low- and moderate-income individuals and households. CDBG funds are used towards operation costs and salary and benefits of staff members that provide fair housing education and counseling.
15	Project Name	Emergency Response Funding
	Target Area	City of Tustin
	Goals Supported	Affirmatively Further Fair Housing Expand Affordable Housing Opportunities Support Community Services Improve Public Facilities and Infrastructure Support Economic Development Support Efforts to Address Homelessness Neighborhood Revitalization Support Programs through Program Administration
	Needs Addressed	Promote Fair Housing Preserve/Increase the Supply of Affordable Housing Support Community Services Enhance Public Facilities and Infrastructure Promote Economic Development Support Efforts to Address Homelessness Neighborhood Revitalization Support Programs through Program Administration
	Funding	Not funded at this time
	Description	Project to remain open and to be funded if an urgent community development need should arise for the City of Tustin including but not limited to: displacement, relocation, acquisition, and replacement of housing; or, support for infectious disease response.
	Target Date	6/30/2026

Estimate the number and type of families that will benefit from the proposed activities	TBD
Location Description	Citywide benefit - project location to be determined if emergency response is warranted.
Planned Activities	Project to remain open and to be funded if an urgent community development need should arise for the City of Tustin including but not limited to: displacement, relocation, acquisition, and replacement of housing; or, support for infectious disease response.

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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 of Tustin does not have a "Target Area" as defined by HUD; however, the City has identified census tracts and block groups where 51% or more of the residents are low- or moderate-income. This area is primarily located in the southwest part of the City. All CDBG funding within the City of Tustin will be directed toward benefiting the low- and moderate-income population. Public service activities must serve a majority of low- or moderate-income residents, and public facilities projects must be located within the CDBG Low/Mod Census Tract Target Area.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Low/Mod Census Tract Target Area	100

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Tustin's rationale for prioritizing CDBG funds to directly benefit the low- and moderate-income population, or to be allocated within census tracts/block groups identified as low- or moderate-income, remains consistent with the approach outlined in the Consolidated Plan (Strategic Plan, Section 10).

Discussion

Tustin is a relatively small jurisdiction with limited areas that meet the federal criteria for slum and blight or concentrations of low- and moderate-income individuals. Nevertheless, the PY 2025-26 funds have been allocated in accordance with the national objectives of the CDBG program, including supporting programs that benefit low- and moderate-income persons or help prevent slum and blight.

In line with the priorities outlined in the Consolidated Plan, the City will focus public services and improvements in the area of the City designated as the CDBG target area. The 2025-26 Action Plan reflects this geographic focus for investment, as shown on the CDBG Low- and Moderate-Income Areas and Project Locations maps.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Tustin has established one-year Action Plan goals for the provision of affordable housing in the following areas: homeowner rehabilitation (assisting eight households), preservation of at-risk affordable rental housing (targeting the preservation of 100 units). For further details on these housing goals, please refer to AP-20. Additionally, the data below outlines the number of homeless, special-needs, and other families assisted with affordable housing. One-year goals for rental assistance and the production of new housing units are also included.

In the prior year 2024-25 program, the City of Tustin launched a new affordable housing initiative, the Homeowner Rehabilitation Program. The City of Tustin intends to continue the program in the 2025-26 program year, in alignment with current Housing Element policies. In partnership with Habitat for Humanity of Orange County, this program aims to increase, improve, and preserve affordable housing using federal Community Development Block Grant (CDBG) funds. The program provides grants for eligible home repairs to low- and moderate-income homeowners earning at or below 80% of the Area Median Income (AMI), as defined by the Department of Housing and Urban Development (HUD). Eligible repairs include, but are not limited to, the repair, replacement, or installation of major systems such as plumbing, heating, electrical, windows, roofing, painting, and handicap accessibility.

One Year Goals for the Number of Households to be Supported	
Homeless	300
Non-Homeless	750
Special-Needs	300
Total	1,350

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	358
The Production of New Units	0
Rehab of Existing Units	8
Acquisition of Existing Units	0
Total	366

Table 59 - One Year Goals for Affordable Housing by Support Type
Discussion

The City of Tustin’s current Housing Element provides an “Assisted Housing Inventory” listing affordable housing units available to special-needs groups and families. Affordable housing for special-needs families is provided at: Tustin Gardens; Coventry Court; and, Heritage Place. Affordable housing for other families is provided at: Kenyon Pointe; Westchester Park; Flanders Pointe; Anton Legacy; Tustin Grove; Ambrose

Lane; Chatam Village; Amalfi; Tustin Field I; Tustin Field II; Arbor Walk; Cambridge Lane; Camden Place; and, Clarendon.

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AP-60 Public Housing – 91.220(h)

Introduction

The City of Tustin does not own or operate any public housing projects. However, the City remains committed to supporting and encouraging the efforts of the Orange County Housing Authority in coordinating between private housing providers and social service agencies. Currently, 117 families, 59 individuals with disabilities, and 169 elderly residents are receiving Section 8 voucher assistance, while 77 Tustin veterans are benefiting from Veterans Affairs Supportive Housing (VASH) assistance through the Orange County Housing Authority.

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

The City does not own or operate public housing, and no public housing developments are proposed for Program Year 2025-26.

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

Not applicable.

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

Not applicable.

Discussion

No further discussion at this time.

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

Introduction

To address the regional needs of homeless individuals and families, the City of Tustin participates in the Continuum of Care (CoC) program sponsored by the County of Orange. The purpose of the Continuum of Care Homeless Assistance Programs is to fund projects that fill gaps in the locally developed Continuum of Care system, helping homeless individuals move toward self-sufficiency and permanent housing. A key component of this effort is funding projects that align with the Department's goal of ending chronic homelessness.

Orange County's Point-In-Time (PIT) Count, branded as Everyone Counts OC, plays a critical role in establishing a baseline for the County's efforts to build a comprehensive and responsive System of Care for individuals and families experiencing homelessness. The County and the Orange County Continuum of Care conducted the 2024 PIT Count during the week of January 22, 2024, as required biennially by the U.S. Department of Housing and Urban Development (HUD). The sheltered count took place on the night of Monday, January 22, 2024, and the unsheltered count occurred between Tuesday, January 23, 2024, and Thursday, January 25, 2024.

According to the most recent data, on any given night in Tustin, approximately 88 homeless individuals are unsheltered, while 335 are sheltered. This information will help ensure that residents have access to fair housing resources and services. Additional efforts to address homelessness include the City's participation in the Association of California Cities - Orange County's Homelessness Task Force, the United to End Homelessness coalition through Orange County United Way, and ongoing collaboration between the Tustin Police Department, CityNet, the Orange County Health Care Agency (PERT Mental Health Services), Orange County Rescue Mission, and the Tustin-based nonprofit Operation Warm Wishes, to provide resources and services to transient homeless individuals in Tustin.

For other special-needs groups who are not homeless, the City's Senior Center offers support to the elderly and frail elderly. Services provided include transportation, case management, information and referrals, shared housing programs, senior activities, health and fitness programs, and recreational activities.

The City allocates CDBG funds to Meals on Wheels Orange County to provide meal services to homebound elderly individuals. Additionally, the City will continue to refer individuals with special needs—such as persons with disabilities (mental, physical, and developmental), those with alcohol or drug dependencies, and individuals with HIV/AIDS—to the appropriate agencies.

For PY 2025-26, the following organizations will utilize CDBG funding to provide homeless services and special needs support: Goodwill of Orange County, Human Options, Families Forward, Family Promise of OC, and Mary's Path.

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

Available statistics currently indicate that the City of Tustin has 26 percent of its homeless population which is unsheltered. The City of Tustin is directly assisting the unsheltered homeless population within Tustin through the collaboration between the Tustin Police Department, CityNet, Orange County Health Care Agency (PERT Mental Health Services), Orange County Rescue Mission, and the Tustin-based nonprofit Operation Warm Wishes, to provide resources and services to the transient homeless in Tustin.

It should additionally be noted, that in March 2019, the City of Tustin opened a new low-barrier temporary homeless shelter with 77 emergency shelter beds for men, women, and families with children. This facility is operated by Temporary Shelter, Inc., and includes a variety of wrap-around and other supportive services to be administered at the site. This site is being established to ensure that unsheltered homeless individuals with ties to Tustin have the opportunity to be provided with a bed and shelter.

The City of Tustin recognizes that homelessness is a regional issue which needs to be addressed by all jurisdictions regardless of individual circumstances. The City identifies the Homeless Accommodation Plan, established for the Tustin Legacy Specific Plan area (formally MCAS Tustin Specific Plan area), as one of the strategies to address homelessness. The Homeless Accommodation Plan provides assistance for supportive housing and supportive services to help homeless persons and families transition from homelessness to living as independently as possible. The plan includes 387 beds at the Village of Hope facility to assist in the movement of homeless individuals and families to permanent housing within 24 months, and supportive services designed to address the special needs of homeless persons. Other homeless service providers operating in the Tustin Legacy Specific Plan area (formally MCAS Tustin Specific Plan area) are the Orange County Social Services Tustin Family Campus, Salvation Army, Orange Coast Interfaith, Families Forward, Human Options and, Temporary Shelter, Inc.

The City has developed a strategy that will continue to refer homeless persons and homeless families with children to service agencies and organizations. Through financial contributions, the City will support agencies which provide shelter and other services to the homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Tustin and the Orange County Rescue Mission have entered into a ground lease agreement to support the construction and rehabilitation of a 5.1-acre site, which will become a 192-unit emergency and transitional housing project at the former MCAS Tustin. The Village of Hope has expanded its transitional housing capacity, increasing to 387 beds, a rise of 195 beds. This emergency and transitional housing facility is currently operational.

Additionally, please refer to the earlier description of the new low-barrier homeless shelter in Tustin, which provides critical assistance to homeless individuals within the community.

The City is also working to expand transitional housing options through the recent opening of the "House of Ruth" project by HomeAid Orange County in partnership with Family Promise of Orange County. This project consists of a newly constructed seven-unit facility and family resource center, designed to provide housing and support services to families with children who are experiencing homelessness or at risk of homelessness.

For the 2025-26 program year, the City will allocate CDBG funds to support emergency shelter and transitional housing initiatives. Specifically, funds will be directed to: Family Promise of Orange County's House of Ruth Emergency/Temporary Housing Program, Families Forward Transitional Housing Program, and Human Options' Third Step Transitional Housing Program.

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 Homeless Housing Partnership program provides assistance for supportive housing and supportive services to help homeless persons and families transition from homelessness to living as independently as possible. The Homeless Housing Partnership Program includes 192 transitional housing units at the Village of Hope campus (operated by the Orange County Rescue Mission) to facilitate the movement of homeless individuals and families to permanent housing within 24 months and supportive services designed to address the special needs of homeless persons.

The City recognizes that homeless individuals often require affordable or subsidized housing to successfully transition to independent living. The Orange County Housing Authority will continue to assist homeless individuals on the Section 8 waiting list. CDBG funds will be specifically allocated to Goodwill of Orange County to provide emergency grants to veterans and their families who are at risk of homelessness. This program has the potential to prevent homelessness for veterans and their families by providing the financial support necessary to keep them housed.

Additionally, services for homeless and at-risk veterans will be provided through Patriots & Paws, an organization that helps low-income and at-risk veterans furnish their homes and apartments. The City also acknowledges the valuable efforts of local nonprofits and churches that work tirelessly to provide support and services for the homeless in the community.

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

The following strategy not only addresses the City of Tustin's efforts to assist individuals and families in avoiding becoming homeless but addresses the overall strategy for assisting the homeless with individual needs, transitional housing needs, and permanent housing needs. The strategy addresses the following:

1. Helping low-income families avoid becoming homeless.
2. Reaching out to homeless persons and assessing their individual needs.
3. Addressing the emergency shelter and transitional housing needs of homeless persons.
4. Helping homeless persons make the transition to permanent housing and independent living.

The City of Tustin will meet these needs of homeless persons and homeless families with children through the following strategies:

1. Continue to refer homeless persons and homeless families with children to service agencies and organizations;
2. Support agencies which provide shelter and other services to the homeless through financial contributions funded through the CDBG Program.
3. Provide for and support the establishment of a homeless accommodation strategy in the reuse of Marine Corps Air Station, Tustin. The City of Tustin has prepared a Reuse/Specific Plan for Marine Corps Air Station (MCAS) Tustin, which was closed July 1999. The Reuse Plan provides the following fundamental guiding principles:
 - a. Coordination and cooperation among the Cities of Tustin and Irvine, support service providers, school districts and advocates for the homeless should be promoted.
 - b. Creating a program and service system separate from the mainstream is inefficient and not consistent with the concept of breaking the cycle of homelessness.
 - c. Established public and private providers should be used for delivery on-site or off-site (by contracting and visiting clinical personnel) of certain program and services. This should be the preferred approach and will assist in the streamlining and consolidation of existing programs.
 - d. Linkages with job-training, employment and education should be encouraged.

As previously mentioned, the City of Tustin participates in the County of Orange's Continuum of Care process and the Association of California Cities – Orange County's Homelessness Task Force. This

collaboration allows the City to stay informed about the region's homeless shelter and service needs. Through its partnership with the Orange County Housing Authority (OCHA), Tustin renter households also have access to OCHA's Family Self-Sufficiency Program. Preference for this program is given to families with children who are homeless or at risk of becoming homeless, such as those spending over 50 percent of their income on rent. In addition to housing assistance, the program offers a range of support services, including job training and employment opportunities, to help participants achieve economic independence.

Tustin has allocated the maximum allowable amount of its CDBG funds to public service programs. While some of the organizations funded do not directly serve the homeless, many of their activities aim to prevent homelessness. These services include counseling for victims of domestic violence, support for at-risk youth, meals for seniors, veterans' services, family and infant care, healthcare services, and youth programs through local organizations such as the Boys and Girls Clubs of Tustin, MOMS Orange County, and Meals on Wheels Orange County.

Discussion

Throughout the 2025-26 Program Year, the City of Tustin will continue to support the priority needs and performance goals outlined in its Consolidated Plan, focusing on strategies to address homelessness. Planned activities include the Homeless Housing Partnership Program, Section 8 Rental Assistance, and providing administrative support for affordable housing initiatives.

DRAFT

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

Introduction:

Barriers or impediments to affordable housing are caused when the incentive to develop this housing is removed due to excessive development costs or the lack of community commitment. Some development costs are motivated by economic conditions and other issues that affected the real estate market, and are outside the control of local government. In addition, the development of affordable housing is affected by both the economic market conditions and the housing policies of federal, state and local governments, and the “Not In My Back Yard” (NIMBY) phenomenon.

Although federal and state environmental regulations are implemented at the local level, these policies have and seem to continue to add to the cost of development. Public policy and community issues that may potentially affect the cost of development and housing projects within the City include the following:

- Land use development
- Cost of labor and materials
- Cost of land
- Environmental problems (wastewater, floodplains, and capacity)
- Deed restrictions and covenants

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

As outlined in the Consolidated Plan, the City has implemented indirect assistance programs to mitigate the negative impacts caused by barriers to affordable housing. The following programs are identified as

the strategies the City of Tustin will use to address these barriers during the 2025-26 Program Year:

- Accessory dwelling units
- Deed restrictions
- Fees, exactions, and permit procedures
- Environmental constraints
- Pre-application conferences
- Permit processing and coordination
- Section 8 Rental Assistance
- Housing referral program
- Density Bonus program
- Mixed-use zoning

Discussion:

Section MA-40 of Tustin’s Consolidated Plan further explores the barriers to affordable housing, detailing constraints such as zoning regulations, housing development fees, the development review process, infrastructure limitations, Davis-Bacon Wage Compliance, floodplain insurance, and other ongoing needs.

DRAFT

AP-85 Other Actions – 91.220(k)

Introduction:

The five-year Consolidated Plan includes a housing and homeless needs assessment, outlining estimated housing needs for Low- and Moderate-income residents, special needs populations, and the homeless. During the 2025-26 Program Year, the City of Tustin will take the following actions to address obstacles to meeting underserved needs, focusing on goals such as fostering and maintaining affordable housing, removing barriers to affordable housing, developing institutional structures, enhancing coordination between public and private housing and social services agencies, improving public housing, and utilizing available federal, state, and local resources.

Actions planned to address obstacles to meeting underserved needs

To meet the needs of Tustin's underserved population, the City will make efforts to:

- Coordinate with federal, state, and local agencies to provide appropriate assistance to residents.
- Collaborate with public service providers to ensure adequate services are available.
- Work to improve physical conditions in slum and blighted areas, focusing on neighborhoods with high concentrations of Low- and Moderate-income residents.

Actions planned to foster and maintain affordable housing

The City will continue to leverage federal, state, and local resources to foster and maintain affordable housing through programs such as:

- Housing rehabilitation for single-family dwellings.

Actions planned to reduce lead-based paint hazards

In Orange County, lead poisoning is addressed by the Orange County Health Care Agency Public Health Services' Lead Poisoning Prevention Program. The Lead Poisoning Prevention Program provides services to the community to increase awareness of lead hazards, and provides resources to parents, medical providers, homeowners, contractors, and workers.

According to 2016 – 2020 ACS data, approximately 6,140 owner-occupied and 7,210 renter-occupied housing units within the City of Tustin were constructed before 1980 and have the potential to contain lead-based paint. With the potential for lead-based paint hazards, the City will utilize a Lead Hazards Review Worksheet which demonstrates compliance with HUD's Lead Safe Housing Rule found within 24 CFR Part 35, and will work with contractors to identify and address lead-based paint hazards in federally-funded housing rehabilitation projects. Where disturbed paint is observed, or if paint will be disturbed as part of the rehabilitation activities, the City will provide interim controls where lead-based paint is found. In order to further efforts to reduce lead-based paint hazards, the City will continue to seek partnerships

with organizations such as the Orange County Public Health Care Agency Public Services.

To additionally address the potential threat of lead-based paint within homes in Tustin, the City will implement into its housing policies over the next five years the following:

- Include lead-based paint hazard reduction as an eligible rehabilitation activity through the City's CDBG grant program.
- Review existing regulations, housing and rehabilitation codes to assure lead-based paint hazard reduction is incorporated.
- Require testing and hazard reduction in conjunction with rehabilitation.
- Require inspections for lead at appropriate times when housing is otherwise being inspected or evaluated.
- Removal of lead-based paint is also a priority health-safety initiative within the City of Tustin's Home Repair Program.

Actions planned to reduce the number of poverty-level families

The City supports and implements the goals and policies outlined in the Housing Element of the General Plan and the Consolidated Plan. These documents aim to provide adequate, safe, and affordable housing for all segments of the population.

The City of Tustin does not have a formally adopted Anti-Poverty Strategy. However, the City's Housing Element includes several goals, policies and programs designed to provide adequate, safe and affordable housing for all segments of the population. Four of the five goals within the Housing Element deal with ensuring that housing is affordable to all segments of the City's population. The City has adopted corresponding policies and programs to implement the strategies. Exhibit 6 includes the Housing Element Goals and Policies which serves as the City of Tustin's Anti-Poverty Goals and Policies.

Actions planned to develop institutional structure

Tustin will continue to participate in "network-building" activities with governmental, nonprofit, and for-profit organizations. These activities include attending quarterly meetings of the Orange County Cities Advisory Committee. The City will also continue funding the Fair Housing Foundation, which provides fair housing and advocacy services regionally. Additionally, Tustin will support collective and cooperative efforts with other Orange County jurisdictions.

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

Although Tustin does not own or operate public housing, it will continue to support the Orange County

Housing Authority’s efforts to coordinate housing resources with social service agencies. The City will work to enhance collaboration between private housing providers and social service organizations to ensure comprehensive assistance for residents in need.

Discussion:

Through these planned actions, Tustin aims to effectively address the underserved needs of its community, ensuring access to safe, affordable housing and necessary social services for vulnerable populations.

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Program Specific Requirements

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

Introduction:

A description of all CDBG funds expected to be available during the 2025-26 program year is provided in Section AP-35 (Projects) of the Action Plan. No program income has been received from the previous program year; none is anticipated for 2025-26. The City has no urban renewal settlements, grant funds returned to the line of credit or income from float-funded activities.

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 |
| Total Program Income: | 0 |

Other CDBG Requirements

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

1. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(I)(2)(vii)). <TYPE=[text] REPORT_GUID=[A0BBB986408D8C25582AC4BE59FA99C5]>

Discussion:

The City of Tustin is implementing a one-year funding cycle for non-public service programs such as public facility improvements, housing/neighborhood rehabilitation and preservation, and program administration/planning activities. Funding requests for these types of projects will be reviewed annually. Public Service programs will be allocated on a three-year funding cycle. This Action Plan covers activities to be funded during PY 2025-26 (year-three of the three-year funding cycle). Funding for 2025-26 public service activities will be based on the prior year funding levels, adjusted to account for variations in CDBG grant allocations from HUD.

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2025-2029
CONSOLIDATED
PLAN

APPENDICES



DRAFT

Appendix A
SF424, SF-424B, Certifications, and
City Council Resolution

Application for Federal Assistance SF-424

* 1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

* 2. Type of Application:

- New
- Continuation
- Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Tustin

* b. Employer/Taxpayer Identification Number (EIN/TIN):

95-600804

* c. UEI:

NYYL6QTC2N7

d. Address:

* Street1:

300 Centennial Way

Street2:

* City:

Tustin

County/Parish:

Orange

* State:

CA: California

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

92780-3715

e. Organizational Unit:

Department Name:

Community Development Dept.

Division Name:

Planning Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Adrienne

Middle Name:

M.

* Last Name:

DiLeva

Suffix:

Title: Senior Management Analyst

Organizational Affiliation:

City of Tustin

* Telephone Number:

714-573-3188

Fax Number:

714-573-3113

* Email:

adileva@tustinca.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:
[Empty field]

Type of Applicant 3: Select Applicant Type:
[Empty field]

* Other (specify):
[Empty field]

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:
Community Development Block Grant/Entitlement Grants

*** 12. Funding Opportunity Number:**

[Redacted]

* Title:
[Redacted]

13. Competition Identification Number:

[Empty field]

Title:
[Empty field]

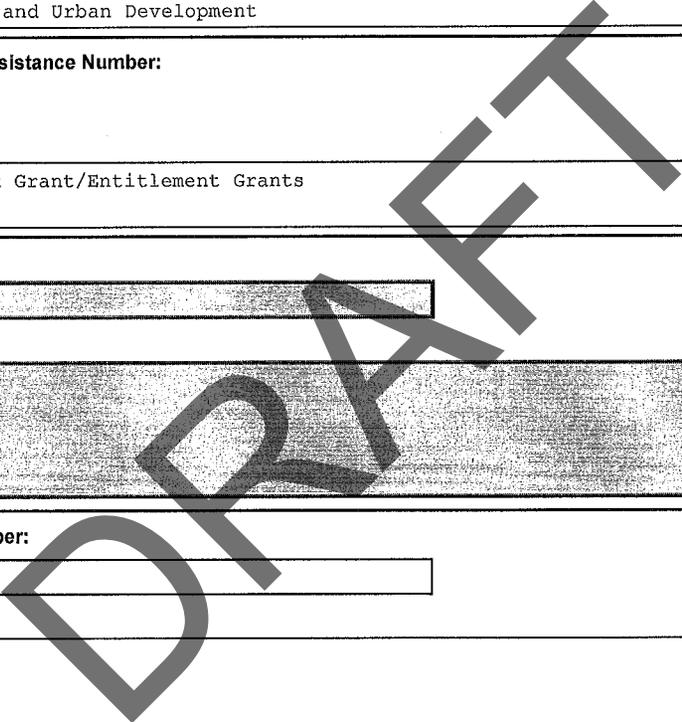
14. Areas Affected by Project (Cities, Counties, States, etc.):

[Empty field]

*** 15. Descriptive Title of Applicant's Project:**

Application for PY 2025-26 CDBG funds. Funds will be used to provide a variety of public services, public facility improvements, code enforcement, and program admin (including fair housing services).

Attach supporting documents as specified in agency instructions.



Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="725,229.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="725,229.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

Instructions for the HUD 424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant: [Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature]:

*Authorized Representative Name:

Justina Willkom

*Title: Community Development Director

*Applicant/Recipient Organization:

City of Tustin

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant

will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

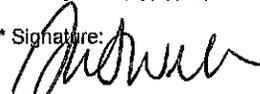
7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

* Signature:



* Date: (mm/dd/yyyy):

6/24/2020

Public Reporting Burden Statement: The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 4176, Washington, DC 20410-5000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

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CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

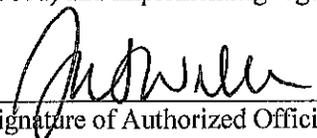
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.L., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons with AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official

6/24/2025

Date

Community Development Director
Title

SPECIFIC COMMUNITY DEVELOPMENT BLOCK GRANT CERTIFICATIONS

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2025-2026 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

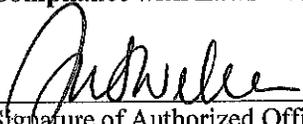
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official



Date

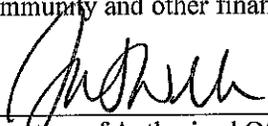
Community Development Director
Title

DRAFT

OPTIONAL COMMUNITY DEVELOPMENT BLOCK GRANT CERTIFICATION

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature of Authorized Official

6/24/2025
Date

Community Development Director
Title

DRAFT

RESOLUTION NO. 25-23

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF TUSTIN, CALIFORNIA, APPROVING THE PROGRAM YEAR 2025-2029 CONSOLIDATED PLAN INCLUDING THE PROPOSED USE OF PROGRAM YEAR 2025-26 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) FUNDS

WHEREAS, under the Housing and Community Development Act of 1974, as amended, Federal assistance may be provided for the support of community development activities which are directed toward certain specific objectives as set forth in the Act as the Community Development Block Grant (CDBG) Program; and

WHEREAS, during the February 26, 2025, public hearing, citizens were furnished with information concerning the CDBG Program, the range of eligible activities, and the proposed use of funds; and

WHEREAS, on February 26, 2025, a public hearing was held by the Citizen Participation Committee to receive public input and testimony, and consider and provided staff with a recommendation on the 2025-2029 Consolidated Plan Goals and Priority Needs; and

WHEREAS, the Draft 2025-2029 Consolidated Plan and 2025-26 Annual Action Plan were noticed in a newspaper of local circulation and posted at City Hall and available for public review for a period of thirty (30) days; and

WHEREAS, a report has been prepared transmitting to the City Council recommended priority needs, goals, and objectives including public testimony received during the hearing or comments received during the 2025-2029 Consolidated Plan and 2025-26 Annual Action Plan public review period; and

WHEREAS, a public hearing was held by the City Council on April 15, 2025, to receive public input and respond to questions and comments on the proposed 2025-2029 Consolidated Plan and 2025-26 one-year Action Plan; and

WHEREAS, the City Council evaluated needs, priorities, goals and objectives based on recommendations of the Citizen Participation Committee and public testimony received during the hearing.

NOW THEREFORE BE IT RESOLVED, the City Council of the City of Tustin resolves as follows:

Section 1: The City of Tustin's 2025-2029 Consolidated Plan and 2025-26 one-year Action Plan are hereby approved as presented to the Council at their hearing of April 15, 2025, and in Exhibit A of this Resolution.

Section 2: Staff is hereby directed to include the proposed use of CDBG Funds for Program Year 2025-26 in the One Year Action Plan of the Consolidated Plan to be submitted to the U.S. Department of Housing and Urban Development.

Section 3: The Director of Community & Economic Development is authorized to make minor modifications and execute such documents, certifications, contracts, or other instruments as may be required to carry out the City's Community Development Block Grant Program.

Section 4: The City Clerk shall certify to the adoption of this Resolution and shall file a copy of said application with the minutes of this City Council meeting.

PASSED AND ADOPTED by the City Council of the City of Tustin at a regular meeting on the 15th day of April 2025.

Signed by:
Austin Lombard

AUSTIN LOMBARD,
Mayor

ATTEST:

Signed by:
Erica Yasuda

ERICA N. YASUDA,
City Clerk



DRAFT

APPROVED AS TO FORM:

DocuSigned by:
David E. Kendig

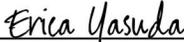
DAVID E. KENDIG,
City Attorney

STATE OF CALIFORNIA)
COUNTY OF ORANGE) SS
CITY OF TUSTIN)

CERTIFICATION FOR RESOLUTION NO. 25-23

I, Erica N. Yasuda, City Clerk and ex-officio Clerk of the City Council of the City of Tustin, California, does hereby certify that the whole number of the members of the City Council of the City of Tustin is five; that the above and foregoing Resolution No. 25-23 was duly passed and adopted at a regular meeting of the Tustin City Council, held on the 15th day of April, 2025, by the following vote:

COUNCILMEMBER AYES: Lumbard, Nielsen, Gallagher, Schnell, Fink (5)
COUNCILMEMBER NOES: _____ (0)
COUNCILMEMBER ABSTAINED: _____ (0)
COUNCILMEMBER ABSENT: _____ (0)
COUNCILMEMBER RECUSED: _____ (0)

Signed by:


ERICA N. YASUDA,
City Clerk



DRAFT

Appendix B – Citizen Participation

Notices of both public hearings

Notices of public review

List of all agencies contacted during preparation of the Con Plan and Action Plan

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1920 Main St. Suite 225
Irvine, California 92614
(714) 796-2209
legals@inlandnewspapers.com

TUSTIN, CITY OF- LEGAL ADS
300 CENTENNIAL WAY
TUSTIN, California 92780

Account Number: 5192550
Ad Order Number: 0011718566
Customer's Reference/PO Number:
Publication: The Tustin News
Publication Dates: 02/13/2025
Total Amount: \$424.66
Payment Amount: \$0.00
Amount Due: \$424.66
Notice ID: IB37jl9ozZjNGFekjoYZ
Invoice Text:

OFFICIAL NOTICE OF PUBLIC HEARING CITY OF TUSTIN Notice is hereby given that the City of Tustin, California, will hold a Citizen Participation Committee (CPC) public hearing to discuss the City's Community Development Block Grant (CDBG) 2025-2029 Consolidated Plan (ConPlan) goals and priorities, and to receive community input. Date: Wednesday, February 26, 2025 Time: 6:00 p.m. Location: City of Tustin Council Chamber, 300 Centennial Way Tustin, CA 92780 An option for virtual participation will also be provided. Instructions to participate virtually can be found on the City's CDBG webpage at www.tusinca.org/cdbg. The purpose of the public hearing is to inform interested citizens about the CDBG program, collect community feedback on CDBG goals and priorities, and receive input and recommendations from the CPC on the goals and priorities, to be submitted to the City Council for consideration. The City Council is anticipated to hold a public hearing to approve the final 2025-2029 ConPlan in April 2025. CDBG Background: The Housing and Community Act of 1974, as amended, created the CDBG program to return Federal funds to local communities for the purpose of developing viable urban communities by providing adequate housing and a suitable living environment and by expanding economic opportunities, specifically for low- and moderate-income persons. Grants are awarded to communities to carry out a wide range of community development activities directed toward neighborhood revitalization, economic development, public services activities, and the provision of improved community facilities and services. Communities are encouraged to obtain citizen suggestions as to potential uses for these funds prior to submitting a formal application to HUD.

The Tustin News
1920 Main St. Suite 225
Irvine, California 92614
(714) 796-2209

300 CENTENNIAL WAY
TUSTIN, California 92780

AFFIDAVIT OF PUBLICATION

STATE OF CALIFORNIA

County of Orange County

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the The Tustin News, a newspaper that has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange County, State of Orange County, on August 24, 1928, Case No. A-601 in and for the City of Irvine, County of Orange County, State of California; that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

02/13/2025

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

Executed at Anaheim, Orange County, California, on
Date: Feb 13, 2025.



Signature

DRAFT

OFFICIAL NOTICE OF PUBLIC HEARING
CITY OF TUSTIN

Notice is hereby given that the City of Tustin, California, will hold a Citizen Participation Committee (CPC) public hearing to discuss the City's Community Development Block Grant (CDBG) 2025-2029 Consolidated Plan (ConPlan) goals and priorities, and to receive community input.

Date: Wednesday, February 26, 2025

Time: 6:00 p.m.

Location: City of Tustin Council Chamber, 300 Centennial Way Tustin, CA 92780

An option for virtual participation will also be provided. Instructions to participate virtually can be found on the City's CDBG webpage at www.tustinca.org/cdbg.

The purpose of the public hearing is to inform interested citizens about the CDBG program, collect community feedback on CDBG goals and priorities, and receive input and recommendations from the CPC on the goals and priorities, to be submitted to the City Council for consideration. The City Council is anticipated to hold a public hearing to approve the final 2025-2029 ConPlan in April 2025.

CDBG Background:

The Housing and Community Act of 1974, as amended, created the CDBG program to return Federal funds to local communities for the purpose of developing viable urban communities by providing adequate housing and a suitable living environment and by expanding economic opportunities, specifically for low- and moderate-income persons. Grants are awarded to communities to carry out a wide range of community development activities directed toward neighborhood revitalization, economic development, public services activities, and the provision of improved community facilities and services. Communities are encouraged to obtain citizen suggestions as to potential uses for these funds prior to submitting a formal application to HUD.

2025-2029 Consolidated Plan

To receive CDBG program funds, the U.S. Department of Housing and Urban Development (HUD) requires jurisdictions to prepare a "Consolidated Plan," a five-year planning document intended to identify a community's overall need for affordable and supportive housing, community development programs, social services, and economic opportunities for low- and moderate-income persons. The Consolidated Plan also outlines a five-year strategy to meet those needs and identifies resources and programs that would address them.

Anyone interested in participating in the CDBG citizen participation process may attend the meeting online or in-person. For additional information, please contact Adrienne DiLeva at adilleva@tustinca.org or (714) 573-3138.

Erica N. Yasuda
City Clerk
The Tustin News
Published: 2/13/25

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1920 Main St. Suite 225
Irvine, California 92614
(714) 796-2209
legals@inlandnewspapers.com

TUSTIN, CITY OF- LEGAL ADS
300 CENTENNIAL WAY
TUSTIN, California 92780

Account Number: 5192550
Ad Order Number: 0011723265
Customer's Reference/PO Number:
Publication: The Tustin News
Publication Dates: 03/13/2025
Total Amount: \$348.22
Payment Amount: \$0.00
Amount Due: \$348.22
Notice ID: 0pnupMV1RN9VqcyIC3LY
Invoice Text:

OFFICIAL NOTICE CITY OF TUSTIN The City of Tustin is in the process of preparing and finalizing its five-year Consolidated Plan (2025-2029) which includes the 2025-26 one-year Action Plan for the Community Development Block Grant (CDBG) program. 2025-2029 Consolidated Plan and 2025-26 Action Plan To receive CDBG program funds, the U.S. Department of Housing and Urban Development (HUD) requires jurisdictions to prepare a "Consolidated Plan," a five-year planning document intended to identify a community's overall need for affordable and supportive housing, community development programs, social services, and economic opportunities for low- and moderate-income persons. The Consolidated Plan also outlines a five-year strategy to meet those needs and identifies resources and programs that would address them. The One-year Action Plan, a section of the Consolidated Plan, serves as the City of Tustin's application to HUD for CDBG funding. The City must submit an Action Plan annually for each of the five years covered by the Consolidated Plan. The purpose of the Action Plan is to detail exactly how the City will spend its annual allocation of funds to meet community needs identified in the Consolidated Plan. The Draft 2025-2029 Consolidated Plan, and One-year Action Plan will be available for public review and comment for thirty (30) days beginning March 13, 2025, and ending April 14, 2025. The documents can be reviewed online at <https://www.tustinca.org/393/CDBG-Reports>. If you require other accommodations to review the document, please contact Adrienne DiLeva at adileva@tustinca.org or 714-573-3138 to make arrangements. The Final 2025-2029 Consolidated Plan and 2025-26 Action Plan will be submitted to HUD by May 16, 2025. The 2025-26

The Tustin News
1920 Main St. Suite 225
Irvine, California 92614
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300 CENTENNIAL WAY
TUSTIN, California 92780

AFFIDAVIT OF PUBLICATION

STATE OF CALIFORNIA

County of Orange County

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the The Tustin News, a newspaper that has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange County, State of Orange County, on August 24, 1928, Case No. A-601 in and for the City of Irvine, County of Orange County, State of California; that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

03/13/2025

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

Executed at Anaheim, Orange County, California, on
Date: Mar 13, 2025.



Signature

DRAFT

**OFFICIAL NOTICE
CITY OF TUSTIN**

The City of Tustin is in the process of preparing and finalizing its five-year Consolidated Plan (2025-2029) which includes the 2025-26 one-year Action Plan for the Community Development Block Grant (CDBG) program.

2025-2029 Consolidated Plan and 2025-26 Action Plan

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Comments pertaining to the Draft 2025-2029 Consolidated Plan and 2025-26 Action Plan, must be submitted in writing by April 14, 2025, at 5:00 p.m. and directed to: Adrienne DiLeva, City of Tustin, 300 Centennial Way, Tustin, California 92780 or adileva@tustinca.org. Questions concerning the Draft Consolidated Plan and the One-year Action Plan should also be directed to Adrienne at adileva@tustinca.org or (714) 573-3138.

Erica N. Yasuda, City Clerk
The Tustin News
Published: 3/13/25

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Lake Forest, CA 92630

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Tustin, CA 92780

Theresa Morris
Boys & Girls Club of Tustin
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Tustin, CA 92780

Matt Bates
City Net
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Long Beach, CA 90807

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New San Cai
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OC Food Access Coalition
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Tustin Chamber of Commerce
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Tustin, CA 92780

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Santa Ana, CA 92705

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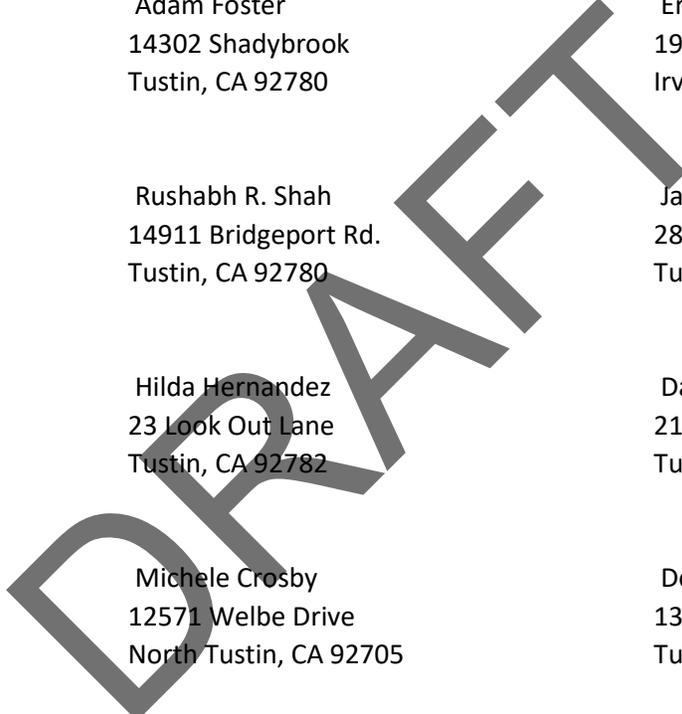
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Appendix C
CDBG Low/Moderate Income Census Tract Target Area

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Appendix D
Anti-Poverty Strategy

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Anti-Poverty Goals and Policies Part I

Goal 1: Provision of an adequate supply of housing to meet the need for a variety of housing types and the diverse socio-economic needs of all community residents commensurate with the City's identified housing needs in the RHNA allocation.

Policy 1.1: VARIETY OF HOUSING CHOICES - Provide site opportunities inventory of vacant and underutilized land for development of housing that responds to diverse community needs in terms of housing type, cost and location, emphasizing locations near services and transit.

Policy 1.2: ACCESSORY DWELLING UNITS – Facilitate the development of accessory dwelling units and junior accessory dwelling units as a means of dispersing affordable units throughout the community.

Policy 1.3: REGULATORY INCENTIVES – Support the use of regulatory incentives, such as density bonuses and deferment of impact fees, to offset the costs of affordable housing while ensuring that potential impacts are addressed.

Policy 1.4: DEVELOPMENT STREAMLINING - Initiate development permit and zoning code streamlining strategies to encourage and expedite residential development (i.e. accessory dwelling units, affordable housing units, and investments in existing buildings) to reduce and eliminate regulatory barriers.

Policy 1.5: SMART GROWTH PRINCIPLES - Encourage infill development or site redevelopment within feasible development sites for homeownership and rental units through the implementation of smart growth principles, allowing for the construction of higher density housing, affordable housing, and mixed-use development (the vertical and horizontal integration of commercial and residential uses) in proximity to employment opportunities, community facilities and services, and amenities.

Policy 1.6 FINANCIAL RESOURCES - Pursue grants and other funding opportunities that support the affordable homeownership and rental housing construction and housing rehabilitation for all segments of the population.

Policy 1.7: PARTNERSHIPS - Continue to implement best practices for developer selection, project underwriting and due diligence and partnerships for affordable housing developments that receive financial and other assistance to ensure long term viability of affordable housing and to ensure the maximized leverage of local resources.

Anti-Poverty Goals and Policies Part II

Goal 2: Promote fair housing opportunities for all people regardless of their special characteristics as protected under state and federal fair housing laws.

Policy 2.1: FAIR HOUSING - Affirmatively further fair housing by taking meaningful actions to combat discrimination, help overcome patterns of segregation, and foster equal housing opportunities for all within the Tustin community

Policy 2.2: HOMELESS HOUSING AND SERVICES – Support and expand housing and services that address the needs of the City’s homeless population.

Policy 2.3: HOUSING OPTIONS - Promote the dispersion and integration of housing for low- and very-low income families throughout the community.

Policy 2.4: SENIOR HOUSING – Support the development and maintenance of affordable senior rental and ownership housing and supportive services to facilitate maximum independence and the ability of seniors to remain in their homes and/or in the community.

Policy 2.5: SPECIAL NEEDS HOUSING - Encourage the availability of affordable housing for special needs households, including large, extremely- low and low-income families. Special needs households include the seniors, large families, female-headed households with children, households with persons with disabilities, and persons experiencing homelessness.

Policy 2.6: FAIR HOUSING PROTECTIONS – Promote fair housing opportunities by supporting the continuation of policies that require relocation assistance, and/or to provide incentives and assistance for purchase of the units by low- and moderate-income households

Anti-Poverty Goals and Policies Part III

Goal 3: Preserve and improve the existing housing supply and prevent displacement of existing tenants.

Policy 3.1: AFFORDABLE RENTAL HOUSING – Support efforts to conserve assisted rental units by work with property owners, tenants, and non-profits to facilitate the preservation of assisted rental housing at risk of conversion to market rate and promote rental assistance programs.

Policy 3.2: FINANCIAL RESOURCES - Pursue grants and other funding opportunities that support the preservation and expansion of affordable housing.

Anti-Poverty Goals and Policies Part IV

Goal 4: Conserve and improve the condition of the existing housing stock.

Policy 4.1: SUBSTANDARD HOUSING PREVENTION - Periodically evaluate housing conditions and, when appropriate, adjust the City's community preservation programs to prevent and address any increase in deteriorated housing conditions.

Policy 4.2: COMMUNITY PRESERVATION - Continue the City's community preservation efforts to enforce health, safety, and zoning codes to prevent and eliminate substandard housing conditions and address deferred maintenance, detrimental to the health, safety and welfare of residents.

Policy 4.3: HISTORIC RESOURCES - Promote the continued maintenance and preservation of City's historically and architecturally significant residential resources.

Policy 4.4: ADAPTIVE REUSE – Encourage the adaptive reuse of historic resources to support affordable housing.

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