

**Housing  
Element**

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**TUSTIN  
GENERAL PLAN**

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October 1, 2013  
Adopted by Resolution No. 13-86

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FIGURE 1: Vacant & Underutilized Land in the City of Tustin

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## INTRODUCTION TO THE HOUSING ELEMENT

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The availability of decent housing and a suitable living environment for every family has been an ongoing concern to all levels of government. In California, this concern is addressed by the California Government Code requirement that each City adopt a Housing Element as a mandatory part of its General Plan.

State Planning Law mandates that jurisdictions within the Southern California Association of Governments (SCAG) region adopt revisions to their Housing Elements by October 15, 2013. As a consequence of this due date, a series of time frames for various aspects of the Housing Element preparation are established. There are two relevant time periods:

- 2006-2014: The previous planning period began in 2006, and ends on June 30, 2014.
- October 2013 – October 2021: the current Housing Element planning period for assessing short-term housing construction needs and implementing housing programs.

The planning period for the Regional Housing Needs Assessment (RHNA) as prepared by SCAG, is from January 1, 2014 to October 1, 2021, a seven and three-quarter year period.

The source of most of the demographic data in this Housing Element and the related Housing Element Technical Memorandum is the U.S. Census Bureau, American Community Survey, 2007-2011 Five-Year Estimates. This was the most comprehensive and recent source of data available at time this Housing Element was prepared.

## PURPOSE OF THE HOUSING ELEMENT

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The Land Use Element is concerned with housing in a spatial context while the Housing Element identifies housing programs aimed at meeting the identified housing needs of the City's population. The Tustin Housing Element includes the identification of strategies and programs that focus on: 1) housing affordability, 2) rehabilitating substandard housing, 3) meeting the existing demand for new housing, and 4) conserving the existing affordable housing stock. The Tustin Housing Technical Memorandum provides background information and supporting documentation.

## **SCOPE AND CONTENT OF ELEMENT**

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The State Legislature recognizes the role of the local general plan, and particularly the Housing Element, in implementing statewide housing goals. Furthermore, the Legislature stresses continuing efforts toward providing affordable housing for all income groups. The Legislature's major concerns with regard to the preparation of Housing Elements are:

- Recognition by local governments of their responsibility in contributing to the attainment of State housing goals;
- Preparation and implementation of housing elements which coordinate with State and Federal efforts in achieving State housing goals;
- Participation by local jurisdictions in determining efforts required to attain State housing goals; and
- Cooperation between local governments to address regional housing needs.

The State Department of Housing and Community Development (HCD) set forth specific requirements regarding the scope and content of housing elements.

## **CONSISTENCY WITH STATE PLANNING LAW**

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The preparation of the City's Housing Element is guided by and must conform to Section 65580 et seq. of the California Government Code. In the introduction of these Government Code sections, the Legislature establishes a policy that the availability of housing in a suitable environment is of vital statewide importance, and a priority of the highest order. It further states that local governments are to address the housing needs of all economic segments, while considering the economic, environmental and fiscal factors and community goals set forth in the General Plan. The following table cites the required components for the Housing Element and cites the document and page references for the required components.

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**TABLE H- 1  
STATE HOUSING ELEMENT REQUIREMENTS**

<b>Required Housing Element Component</b>	<b>Page</b>
<b>A. <u>Housing Needs Assessment</u></b>	
1. Analysis of population trends in Tustin in relation to regional trends	HTM 8 & HE 8
2. Analysis of employment trends in Tustin in relation to regional trends	HTM 11 & HE 10

**TABLE H- 1  
STATE HOUSING ELEMENT REQUIREMENTS**

<b>Required Housing Element Component</b>	<b>Page</b>
3. Projection and quantification of Tustin's existing and projected housing needs for all income groups	HE 28 & HTM 33
4. Analysis and documentation of Tustin's housing characteristics including the following:	
a) level of housing cost compared to ability to pay;	HTM 17
b) overcrowding;	HTM 14
c) Housing stock condition.	HTM 29
5. An inventory of land suitable for residential development including vacant sites and sites having redevelopment potential and an analysis of the relationship of zoning, public facilities and services to these sites	HE 52-53
6. Identification of a zone or zones where emergency shelters are allowed as a permitted use	HE 42
7. Analysis of existing and potential governmental constraints upon the maintenance, improvement, or development of housing for all income levels	HTM 45 & HE 33
8. Analysis of existing and potential non-governmental and market constraints upon maintenance, improvement, or development of housing for all income levels	HTM 63 & HE 31
9. Analysis of special housing need: persons with disabilities (including developmental disabilities), the elderly, large families, female-headed family households, farmworkers, and families and persons in need of emergency shelter	HE 15 & HTM 18
10. Analysis concerning the needs of homeless individuals and families in Tustin	HE 19 & HTM 22
11. Analysis of opportunities for energy conservation with respect to residential development	HTM 67
12. Analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years	HE 22-23 & HTM 35-36
<b>B. <u>Goals and Policies</u></b>	
1. Identification of Tustin's goals, quantified objectives and policies relative to maintenance, preservation, improvement, and development of housing	HE 54

**TABLE H- 1  
STATE HOUSING ELEMENT REQUIREMENTS**

Required Housing Element Component	Page
<b>C. <u>Implementation Program</u></b>	
An implementation program should do the following:	
1. Identify adequate sites which will be made available through appropriate action with required public services and facilities for a variety of housing types for all income levels	HE 86-104
2. Assist in the development of adequate housing to meet the needs of extremely low, very-low, low-and moderate-income households	HE 86-104
3. Identify and, when appropriate and possible, remove governmental constraints to the maintenance, improvement, and development of housing	HE 86-104
4. Conserve and improve the condition of the existing and affordable housing stock	HE 86-104
5. Promote housing opportunities for all persons	HE 86-104
6. Identify programs to address the potential conversion of assisted housing developments to market rate units	HE 86-104
7. Identify agencies and officials responsible for implementation	HE 86-104
8. Include a description of the public participation effort	HE 5-7

Source: California Government Code, §65583, et al.

## **GENERAL PLAN CONSISTENCY**

While a city must consider housing needs for all economic segments, it must also maintain internal consistency among other elements of the General Plan as required by state law. Neither the Housing Element nor any other element may supersede any other required Tustin General Plan elements.

The Housing Element relates to other elements in a variety of ways. The Land Use Element directly relates to the Housing Element by designating areas of the City in which a variety of residential types and densities exist.

The Housing Element's relationship to the Conservation, Open Space, and Recreation Element is conditioned by the need to serve a growing population's recreational needs in the areas of the City with the highest density. Also, housing needs for low cost land must be balanced by the need to conserve natural resources.

The Circulation Element attempts to provide an efficient and well-balanced circulation system. This system must be designed to accommodate allowed land uses, including residential uses, and the intensity of allowable uses should not exceed the ultimate capacity to accommodate them.

The Safety Element relates to the Housing Element by designating areas that are unsafe for development such as Alquist-Priolo Zones, floodplains, etcetera.

Similar to the Safety Element, the Noise Element relates to the Housing Element by addressing a health related issue area. Techniques for reducing noise often involve buffers between land uses.

The Growth Management Element overlaps the issues raised in the Housing Element in its efforts to ensure that the planning, management, and implementation of traffic improvements and public facilities are adequate to meet the current and projected needs of Orange County.

The Housing Element has been reviewed for consistency with the City's other General Plan elements and policy directions. As parts of the General Plan are amended in the future, this housing element will be reviewed to ensure that consistency is maintained.

## **CITIZEN PARTICIPATION**

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The California Government Code requires that local governments make diligent efforts to solicit public participation from all segments of the community in the development of the Housing Element. Public participation in the Housing Element Update process occurred through the following methods:

- A public workshop was conducted on April 23, 2013 to provide an opportunity for interested persons to ask questions and offer suggestions on the proposed Housing Element. Approximately 24 members of the public attended the workshop, and nine (9) individuals provided verbal comments. Seven (7) of the speakers expressed concerns and provided comments regarding the affordable housing needs of individuals with developmental disabilities. These needs and related programs are addressed in the draft Housing Element. The other speakers provided general comments regarding senior housing and the need for affordable housing. Notice of this workshop was published in the Tustin News, on the City's website, and was also mailed to the City's list of local housing interest groups. A copy of the mailing list is included as Appendix C.
- Specific implementation programs included in the Housing Element Update were also discussed at various public hearings in anticipation of the Housing Element Update. These hearings include the Federal Community

Development Block Grant Program public hearings held on March 5, 2013, and May 7, 2013.

- Public hearings were held on August 13, 2013, by the Planning Commission and on October 1, 2013, by the City Council to provide additional opportunities for public review and comment on the Housing Element Update and supporting documents. All public meetings were advertised in the Tustin News and the City's website. Special notifications were also sent to those on the City's list of interested parties.
- Draft Housing Element, Technical Memorandum, and relevant documents were made available at the City Hall, Library, on City's website for easy access and download, and mailed to requesting parties. Public comments received were evaluated and incorporated into the staff report to the Planning Commission and the City Council. As appropriate, the Housing Element has been revised to address these comments.
- On June 21, 2013, the City sent the draft Housing Element to the Department of Housing and Community Development (HCD). On October 1, 2013, the City Council adopted the Housing Element Update as required by State Law. Following adoption, on October 10, 2013, the City sent the adopted Housing Element to HCD for final review. On, \_\_\_\_\_ 2013, the City received final approval from HCD. The City advertised the availability of the Housing Element in English and Spanish in two local newspapers and also made the Housing Element available at City Hall, the City's website, and the Tustin Library. The City also sent direct mailings to over 100 organizations consisting of youth, seniors, veterans, disabled, homeless shelters, cultural organizations, housing advocates, religious organizations, housing builders, fair housing council, and individuals interested in the process. Revised Housing Element and its relevant documents are posted on the City website to allow the public and interested organization easy access and download.

In addition to public input received at the April 23, 2013, public workshop, the City received written public comments from several individuals and organizations. The City received correspondence pertaining to the needs of individuals with development disabilities. The Housing Element addresses the needs of persons with development disabilities by first defining the term "developmentally disabled," by explaining the specific needs of persons with developmental disabilities, by describing some of the services available, by providing an estimate of the number of persons with development disabilities living in Tustin, and by including a program to work with the Regional Center of Orange County to implement an outreach program that would inform the public of the services available to persons with developmental disabilities in Tustin. In addition, the

City's Housing Authority is committed to working with entities seeking funding to provide housing for persons with developmental disabilities.

In addition, a letter was received from the Airport Land Commission. Although the Housing Element update does not propose any new development within the John Wayne Airport Planning Area, Airport Land Commission staff indicated that their review is required for the General Plan Amendment and that it would be possible for their review to occur prior to the City Council hearing. This review is more procedural in nature, and no issues are anticipated.

Correspondence from the Kennedy Commission commended the City for its efforts in encouraging and facilitating the development of affordable housing. The Kennedy Commission included four recommendations in their letter. The first and third recommendations are already addressed in that the City has continued its partnership with the Kennedy Commission and the City already has density bonuses and other incentives available citywide for affordable housing. The second and fourth recommendations relate to potential funding sources and fee waivers for affordable housing and therefore, will be considered by the City Council.

Finally, the Department of Transportation (Caltrans) provided general comments on the Draft Housing Element, encouraging efficient land use patterns and more sustainable communities, and acknowledging that the Housing Element update does not propose any significant land use changes.

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## SUMMARY OF ISSUES, NEEDS, CONSTRAINTS AND OPPORTUNITIES

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This section of the Housing Element summarizes Tustin's current and projected housing needs to form the basis for establishing program priorities and quantified objectives in the Housing Element. This section also:

- Estimates the number of households that meet Federal or State criteria for special consideration when discussing specialized needs;
- Evaluates assisted units at risk of conversion;
- Describes constraints that may discourage the construction of new housing; and
- Examines housing opportunity sites.

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### SUMMARY OF HOUSING NEEDS

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A number of factors will influence the degree of demand or "need" for housing in Tustin. The major "needs" categories considered in this Element include:

- Housing needs resulting from increased population and employment growth in the City and the surrounding region;
- Housing needs resulting from household overcrowding;
- Housing needs resulting from the deterioration or demolition of existing units;
- Housing needs that result when households are paying more than they can afford for housing;
- Housing needs resulting from the presence of "special needs groups" such as the elderly, large families, female-headed households, households with a disabled person, and the homeless; and
- Housing needs resulting from conversion of the assisted housing stock to market rate.

#### **Population Growth**

As shown in Table H-2, between 2000 and 2010 the City's population grew from 67,504 to 75,540, an increase of 11.9 percent. Between 2010 and 2012 population growth slowed significantly, falling 41.2 percent from the yearly average of 1.2 percent between 2000 and 2010 to .7 percent over the past 2 years. The City of Tustin's growth rate between 2010 and 2012 was slightly slower than the

countywide growth rate but faster than the nearby cities of Garden Grove, Orange, and Santa Ana. Recent projections released by the Center for Demographic Research, CSUF (Orange County Projections 2010 Modified, January 26, 2012) indicate that Tustin's population will increase by an annual rate of approximately 0.7 percent during this implementation period, bringing the total population to 83,534 by the year 2025. Table H-2 compares the City's growth rate between 2000 and 2012 with other Orange County cities and the County as a whole.

A large percentage of Tustin's population growth can be attributed to annexations that have occurred since 1980. The remainder can be attributed to a variety of other factors, including shifts in family structures from smaller to larger families, redevelopment of existing developed areas, infill development, and residential construction in East Tustin and Tustin Legacy (former Marine Corps Air Station [MCAS] Tustin). Substantial population and housing growth will continue during this planning period with the continued development at Tustin Legacy.

**TABLE H- 2**  
**Population Growth 2000-2012**  
**City of Tustin, Nearby Jurisdictions and Orange County**

Jurisdiction	2000 <sup>1</sup>	2010 <sup>2</sup>	2012 <sup>3</sup>	Percent Growth	
				2000-2010	2010-2012
Tustin	67,504	75,540	76,567	11.9%	1.4%
Anaheim	328,014	336,265	343,793	2.5%	2.2%
Garden Grove	165,196	170,883	172,648	3.4%	1.0%
Irvine	143,072	212,375	223,729	48.4%	5.3%
Orange	128,821	136,416	138,010	5.9%	1.2%
Santa Ana	337,977	324,528	327,731	-4.0%	1.0%
Orange County	2,846,289	3,010,232	3,055,792	5.8%	1.5%

Sources: <sup>1</sup> 2000 U.S. Census

<sup>2</sup> 2010 U.S. Census

<sup>3</sup> Department of Finance estimates 2012

Population projections are shown in Table H-2A. According to Orange County Projections (OCP) 2010 Modified data, the population in the City of Tustin is expected to increase by approximately 6.3 percent from 77,965 persons in 2015 to 82,878 persons by the year 2035, after a peak population of 83,944 in 2030. The decrease in the last five years of the projections is attributed to general countywide

demographic characteristics, such as the age structure of the population, declining fertility rates, low housing growth, and declining immigration.

**TABLE H- 2A**  
**Population Projection**

	2015	2020	2025	2030	2035	Percent Change (2015- 2035)
Tustin	77,965	81,310	83,534	83,944	82,878	6.30%

Source: Center for Demographic Research at Cal State Fullerton - OCP 2010 Modified, January 26, 2012

### Employment

According to 2007-2011 American Community Survey data, the City of Tustin had 41,761 residents in the labor force, of which 38,308 (91.7 percent) were in the labor market. Of these, 83.7 percent were private wages and salary workers. Table HTM-4 in the Technical Memorandum shows the breakdown of employment by occupation.

In 2011, the largest occupational category was management, business, science and arts occupations, in which a total of 15,698 were employed. The second largest category was the sales and office occupations, employing 10,214.

Table H-3 provides employment projections between the years 2015 and 2035. According to OCP-2012 Modified data, employment in the City of Tustin is expected to increase by approximately 47 percent between 2015 and 2035.

**TABLE H- 3**  
**Employment Projection**

	2015	2020	2025	2030	2035	Percent Change (2015- 2035)
Tustin	45,428	51,890	60,370	65,425	66,771	46.98%

Source: OCP 2010 Modified, Prepared by Center for Demographic Research at Cal State Fullerton.

In terms of industry, the Educational services, and health care and social assistance and Professional, scientific, and management, and administrative and waste management services sectors employed the largest number of persons with 6,947 (18.1%) and 5,606 (14.6%) employees, respectively. Table H-4 is a summary of the number of employees by industry.

Due to its favorable location, demographics, and business environment, Tustin is home to several large employers. The City's top ten employers include: Young's Market Co. LLC, Tustin Unified School District, Lamppost Pizza Corp., Ricoh Electronics Inc., Toshiba America Medical Systems, Rockwell Collins Inc., Costco, Cherokee International Inc., City of Tustin, and Raj Manufacturing Inc.

Table H-4 provides a list of the largest employers in Tustin in 2011. The list includes a variety of industries, including manufacturing, health care, retail, and technology sectors.

**TABLE H- 4**  
**LIST OF MAJOR EMPLOYERS IN TUSTIN, CA 2011**

Company/Address	No. Emp.	Product/Service
Young's Market Co LLC 14402 Franklin Ave Tustin, CA 92780	2,100	Distributor
Tustin Unified School District 300 South C St. - Tustin 92780	1,728	Education
Lamppost Pizza Corp 3002 Dow Ave, Tustin, CA	1,400 <sup>1</sup>	Corporation
Ricoh Electronics, Inc. 1100 Valencia Ave. - Tustin, 92780	1,384	Manufacturer
Toshiba America Medical Systems 2441 Michelle Dr. - Tustin, 92780	900	Distributor, Medical Equipment
Rockwell Collins - (714) 317-8102 14192 Franklin Ave.- Tustin, 92780	600	Manufacturer
Costco Wholesale 2700 Park Ave. - Tustin 92780; 2655 El Camino Real, Tustin, CA	450	Wholesale Trade
Cherokee International 2841 Dow Ave. - Tustin, 92780	350	Power Supplies
City of Tustin 300 Centennial Way - Tustin 92780	300	Government
Raj Manufacturing Inc. 2692 Dow Ave, Tustin, CA	260	Manufacturing
Cash Plus Inc. 3002 Dow Ave, Tustin, CA	250	Financial Services
Kleen Impressions 17300 17th St # J Pmb 388, Tustin, CA	250	Cleaning Services
Ricoh Business Solutions 1123 Warner Ave Tustin, CA 92780	250	Business Services
Southern California Pipeline 15991 Red Hill Ave, Tustin, CA	235	Construction
Home Depot 2782 El Camino Real - Tustin, 92780	203	Retail
Health South Tustin Rehab Hospital 14851 Yorba St, Tustin, CA	200	Medical

Logomark, Inc. 1201 Bell Ave. – Tustin 92780	200	Wholesale Trade
Red Robin Gourmet Burgers <sup>2</sup> 3015 El Camino Real, Tustin, CA	200 <sup>1</sup>	Retail
SMC Corporation of America 14191 Myford Rd. – Tustin 92780	200	Manufacturer
Straub Distributing Company <sup>3</sup> 2701 Dow Ave. – Tustin, 92780	200	Wholesale Trade
Tustin Toyota 36 Auto Center Dr., Tustin, CA	200	Automotive Dealer

SOURCE: City of Tustin Comprehensive Annual Financial Report For the Year Ended June 30, 2011

<sup>1</sup> The employee count appears to include those employed at locations outside of Tustin.

<sup>2</sup> Red Robin Gourmet Burgers was located at 3015 El Camino Real in 2011 and has relocated to 2667 Park Avenue.

<sup>3</sup> Straub Distributing Company was located in Tustin in 2011, but is no longer doing business in Tustin.

## Jobs-Housing Balance

The “jobs-housing balance” test is a general measure of a community’s employment opportunities with respect to its residents’ needs. A balanced community would reach equilibrium between employment and housing opportunities so the majority of the residents could also work within the community.

Table H-5 shows the 2011 jobs-housing balance for the City of Tustin as well as Orange County and the Southern California region. Tustin had a jobs/housing ratio of 1.40 in 2011, while Orange County and the region had jobs/housing ratios of 1.38 and 1.23, respectively. This demonstrates that Tustin is a job-rich community when compared to county and regional averages.

**TABLE H- 5**  
**JOBS-HOUSING BALANCE**  
**CITY/COUNTY/REGION**  
**2011**

	<b>Tustin</b>	<b>Orange County</b>	<b>SCAG Region</b>
Total Jobs	36,869	1,447,768	7,174,832
Housing Units	26,418	1,046,323	6,311,587
Jobs/Housing Ratio	1.40	1.38	1.14

Sources: U.S. Census Bureau: 2007-2011 American Community Survey; Center for Economic Studies, 2011.

## Overcrowding

From 2007 to 2011 there has been a decrease in unit overcrowding, as fewer households "double up" to save on housing costs. Overcrowding is often reflective

of one of three conditions: 1) a family or household is living in a dwelling that is too small; 2) a family chooses to house extended family members (i.e., grandparents or grown children and their families living with parents, termed doubling); or 3) a family is renting living space to non-family members.

State and Federal Housing Law defines overcrowded housing units as those in which the ratio of persons-to-rooms exceeds 1.0. The rooms considered in this equation exclude bathrooms, kitchens, and hallways, but includes other rooms such as living and dining rooms. The 2007-2011 American Community Survey showed that 2,508 (10 percent) of households living in overcrowded conditions in Tustin. Of the households living in such conditions, 78 percent were renters. Renter households had a significantly higher incidence of overcrowding than owner households: 7.8 percent of renter and 2.2 percent of owner households were overcrowded. Table HTM-8 of the Housing Element Technical Memorandum illustrates the numbers of all Tustin households living in overcrowded conditions.

### **Substandard Units**

By 2020, approximately 62 percent of the City's housing stock will be over 30 years old, the age at which housing tends to require significant repairs. This indicates a potential need for rehabilitation and continued maintenance of over 17,324 dwelling units<sup>1</sup>.

### **Affordability**

State and Federal standards for rental housing overpayment are based on an income-to-housing cost ratio of 30 percent and above. Households paying greater than this percentage will have less income left over for other necessities, such as food, clothing and health care. Upper income households are generally capable of paying a larger proportion of their income for housing, and therefore estimates of housing overpayment generally focus on lower income groups.

As identified in the 2012 RHNA, 2,458 Tustin households are at or below 30% of the County Median Household Income (MHI) and considered "Extremely Low Income." The 2012 RHNA also shows 11,266 of Tustin households were paying more than 30 percent (overpaying) of their income on housing needs. Table HTM-12 of the Housing Element Technical Memorandum reflects American Community Survey estimates for households overpaying for shelter. While most extremely low income households are currently housed, they are in a precarious position, particularly those overpaying for housing in light of the current housing market, and could face the threat of homelessness.

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<sup>1</sup> 2007-2011 American Community Survey; City of Tustin.

The distinction between renter and owner housing overpayment is important because, while homeowners may over-extend themselves financially to afford the option of home purchase, the owner always maintains the option of selling the home, thereby generally lowering housing costs. In addition, home ownership affords tax benefits to reduce monthly costs. Renters are limited to the rental market, and are generally required to pay the rent established in that market. According to the American Community Survey data, of the total 4,585 lower income households identified as over-payers, 3,368 were renter households and 1,217 were owner households. This discrepancy is largely reflective of the disproportionate number of rental housing units in the City and the tendency of renter households to have lower incomes than owner households (see Table HTM-11 in the Technical Memorandum).

Table H-6 summarizes the characteristics of the current apartment inventory in the City of Tustin as of the first quarter 2013 based on data from REALFACTS. The data include a total of 28 apartment properties and 5,810 units, with an average of 208 units per property. All properties in the inventory have at least 100 units and were built between 1957 and 1997. Therefore, the data do not include small multifamily properties.

The overall rental vacancy rate for Tustin in 2011 was 5.6 percent, up considerably from 4.3 percent in the first quarter of 2007. Generally, a vacancy rate of 5 percent is considered to reflect a “tight” housing market. Department of Finance data for Tustin as of January 2013 show a vacancy rate of 4.8 percent for all housing types in Tustin (single- and multi-family, owner and rental).

The data show that approximately 40 percent of apartment units in the City have one bedroom, 52 percent have two bedrooms, and 5 percent have three bedrooms. Average monthly rents are \$1,340 for a one-bedroom, one-bath unit. For two-bedroom units, average monthly rents are \$1,448 for units with one bath, \$1,412 for units with one and a half baths, \$1,828 for units with two baths, and \$1,695 for two-bedroom townhouse units. The average monthly rent for a three-bedroom unit with one and a half baths is \$1,777 and for a three-bedroom unit with two baths the average rent is \$2,391. The average rent for a three-bedroom townhouse unit is \$1,845.

The weighted average rental rate for the inventory increased 1.9percent over the past year<sup>2</sup>. Rents for studios increased the most at 5.1 percent, followed by two-bedroom one-bath units at 3.5 percent, and one-bedroom one-bath units at 3.1 percent.

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<sup>2</sup> These weighted average rents weight the average rent by bedroom count by the number of units in that bedroom count category.

**TABLE H- 6**  
**Apartment Inventory Characteristics**  
**March 2013**

Unit Size	Units	Percent	Average SF	Average Rent	Average Rent/SF
Studio	200	3.4%	521	\$1,267	\$2.43
Jr 1 BR	32	0.6%	470	\$1,070	\$2.28
1 BR/1 BA	2,303	39.6%	732	\$1,340	\$1.83
2 BR/1 BA	625	10.8%	976	\$1,448	\$1.48
2 BR/1.5 BA	266	4.6%	945	\$1,412	\$1.49
2 BR/2 BA	1,924	33.1%	1,021	\$1,828	\$1.79
2 BR TH	194	3.3%	1,079	\$1,695	\$1.57
3 BR/1.5 BA	36	0.6%	1,371	\$1,777	\$1.30
3 BR/2 BA	210	3.6%	1,172	\$2,391	\$2.04
3 BR TH	20	0.3%	1,516	\$1,845	\$1.22

"TH" signifies a Townhouse Unit.

Note: Averages for the Total row are weighted averages.

Source: Realfacts

### Affordability Gap Analysis

In addition to information related to Housing Constraints provided in the City's Housing Element Technical Memorandum, a Comprehensive Housing Affordability Strategy was prepared in 2008. The report contains a detailed affordability gap analysis to illustrate the "gap" between the cost of developing housing for rent and ownership and what households at a variety of income levels can afford to pay toward their housing expenses. A Summary of Renter and Owner Affordability Gaps for certain prototypical unit types and incomes are provided as Appendix "B."<sup>3</sup>

### Special Needs Groups

Certain segments of the population may have a more difficult time finding decent, affordable housing due to special circumstances and may require specific accommodation or assistance to meet their housing needs. Included as special needs groups are the elderly, disabled, including persons with developmental disabilities, female-headed households, large families, and homeless persons. As there are no known "farmworkers" residing in Tustin this group is not discussed in the Housing Element.

**Elderly:** The special needs of many elderly households result from their lower, fixed incomes, physical disabilities, and need for assistance. As shown in Table HTM-2,

<sup>3</sup> Summary based on data contained in Comprehensive Housing Affordability Strategy, 2008.

persons aged 65 years or older in Tustin comprised 8.8 percent of the population in 2011.

Table H-7 shows the tenure of households with the head of household aged 65 years or older in the City of Tustin in 2011. The City had 1,071 renter households and 2,839 owner households with a head of household aged 65 years or older. Households with a senior householder represented 15.7 percent of all households in the City.

**TABLE H-7**  
**Tenure of Households with Head of Household Aged 65 Years or Older**  
**2011**

Tenure	Head of Household 65 Years or Older	
	# Households	% Households
Renters	1,071	9.1% <sup>1</sup>
Owners	2,839	21.7% <sup>2</sup>
<b>Total Households</b>	<b>3,910</b>	<b>15.7%<sup>3</sup></b>

<sup>1</sup> As a percentage of 11,833 renter households.

<sup>2</sup> As a percentage of 13,112 owner households.

<sup>3</sup> As a percentage of 24,945 total households.

Source: U.S. Census, 2007-2011 American Community Survey

Table H-7A shows the estimated household income distribution for householders aged 65 years or older in 2011. Approximately 14 percent of elderly households in Tustin earned less than \$25,000 annually or about 37 percent of AMI for a household of two persons in 2011.<sup>4</sup>

**TABLE H-7A**  
**Estimated Household Income Distribution**  
**Households with Head of Household Aged 65 Years or Older**  
**2011**

Income Range	Number	Percent	Cumulative %
Less Than \$10,000	153	3.9%	3.9%
\$10,000-\$24,999	394	10.1%	14.0%
\$25,000-\$34,999	300	7.7%	20.7%
\$35,000-\$49,999	479	12.2%	33.9%
\$50,000-\$74,999	676	17.3%	50.2%
\$75,000-\$99,999	566	14.5%	64.7%
\$100,000 or More	1,342	34.3%	100.0%
<b>Total Households</b>	<b>3,910</b>	<b>100.0%</b>	

Source: U.S. Census Bureau: 2007-2011 American Communities Survey. Table B19037

<sup>4</sup> HUD median household income for a family of two in Orange County in 2011 was \$67,350.

**Disabled:** Physical and developmental disabilities can hinder access to housing units of traditional design and potentially limit the ability to earn adequate income. According to the 2009-2011 ACS, a total of 2,192 persons in Tustin between 18 and 65 years of age reported a disability. In addition, 1,745 persons over age 65 reported a disability in 2011.

Special housing needs of disabled individuals include wheelchair accessibility, railings, and special construction for interior living spaces. The Housing Element sets forth policies to encourage the development of disabled-accessible housing (see policies 1.11, 1.13, 1.15).

**Persons with Developmental Disabilities:** As defined by federal law, “developmental disability” means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency;
- Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The U.S. Census Bureau does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person’s living situation as a child to an appropriate level of independence as an adult.

The State Department of Developmental Services (DDS) currently provides community-based services to approximately 243,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers, four

developmental centers, and two community-based facilities. The Regional Center of Orange County (RCOC) is one of 21 regional centers in California that provides point of entry to services for people with developmental disabilities. The RCOC is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

Any resident of Orange County who has a developmental disability that originated before age 18 is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans and may include: Adult day programs; advocacy; assessment/consultation; behavior management programs; diagnosis and evaluation; independent living services; infant development programs; information and referrals; mobility training; prenatal diagnosis; residential care; respite care; physical and occupational therapy; transportation; consumer, family vendor training; and vocational training. RCOC also coordinates the state-mandated Early Start program, which provides services for children under age three who have or are at substantial risk of having a developmental disability. According to the RCOC February 2010 Facts and Statistics data, the RCOC currently serves approximately 16,728 individuals.

According to the RCOC, there are at least 428 children and adults with developmental disabilities living within the City of Tustin. There may be others who have chosen not to receive services from the Regional Center or who are not aware of or understand the services provided by the Regional Center.

**Large Families:** A family household containing five or more persons is considered a large family, as defined by the Census Bureau. Large families are identified as groups with special housing needs because of the limited availability of adequately sized, affordable housing units. Large families are often of lower income, frequently resulting in the overcrowding of smaller dwelling units and accelerating unit deterioration.

According to the 2007-2011 ACS, 3,852 family households, or 15.4 percent of all households, had five or more persons (see Housing Element Technical Memorandum Table HTM-14). Of those, approximately 47.6 percent were owner-households and 52.4 percent were renter households.

**Female-Headed Parent Households:** The housing needs of female-headed households with children are generally related to affordability since such households typically have lower than average incomes. According to the 2007-2011 ACS, the City of Tustin had 1,652 female-headed households with children less than 18 years of age.

**Single Room Occupancy (SRO):** A single room occupancy unit typically is a 250 to 500 square feet residential unit, with a sink and closet, which may require the occupant to share a communal bathroom, shower, and/or kitchen. SRO units are allowed within the City's Multiple Family Residential districts and Planning Area 3 of the MCAS Tustin Specific Plan. Single room occupancy units such as rest homes also are allowed within Commercial Districts in the city through approval of a Conditional Use Permit. Although no specific ordinance is in place to address SRO units, the City may consider the adoption of single-room occupancy (SRO) ordinance during the planning period.

**The Homeless:** Measuring the extent of the homeless population specifically in Tustin remains a challenge for community leaders. To complicate the challenge of meeting homeless persons' needs, the issue of homelessness is considered regional in nature. Nomadic tendencies of homeless persons make it difficult to assess the population accurately on a citywide basis; therefore, homelessness should be addressed on a countywide basis, in conjunction with cities and local non-profit organizations.

The Orange County Housing and Community Development Department defines homelessness as not having a permanent address, sleeping in places not meant for habitation, not having ample food and medical attention or a place to change clothes or bathe. Per this definition, the County of Orange estimates in 2011 there were 18,325 homeless in the County. For those 18,325 homeless, there are only about 3,357 available beds, including 1,156 emergency shelter beds and 2,201 beds in transitional housing facilities, according to the Orange County Ten-Year Plan to End Homelessness 2012.

The homeless population is comprised of subgroups, which include:

- a) The economic homeless who lack financial resources to pay rent;
- b) The situational homeless who have suffered economic or personal trauma and find themselves in personal disorganization; and,
- c) The chronic homeless who are unable to care for themselves due to chronic illness, disability or debilitating substance abuse.

The City of Tustin's 2010-2015 Consolidated Plan states that, according to police reports and windshield surveys performed within the City of Tustin, most homeless persons migrate through Tustin to other parts of the County rather than stay for extended periods of time within the City. The City's Police Department estimates that there are 10-12 homeless persons residing in the City at any given time.

There are numerous factors that contribute to homelessness in Tustin and Orange County. The known causes of homelessness include unemployment, limited skills,

and a breakdown in the family as a social and economic unit. Additionally, cutbacks in social service programs and the de-institutionalization of the mentally ill during the 1980s have contributed to the homeless population. A new trend, however, is emerging as a significant contributing element to homelessness: a fast-growing lack of affordable housing, which could exacerbate any of the above conditions, but may increasingly become a standalone cause of homelessness.

Although there are no established areas where unsheltered homeless persons congregate in the City, there are several homeless services facilities in the City. One of the shelters in Tustin, the 45-bed Sheepfold shelter provides shelter, food, clothing, job training, and job-referral services primarily to battered women and children. Guests are admitted on a first-come, first-served basis. Usually all beds are fully occupied. The shelter services a large area including many portions of Orange and San Bernardino Counties.

Within the City of Tustin, there are a variety of Non-Profit Organizations (NPOs) that provide direct housing and related services to homeless persons. These include Village of Hope, an emergency/transitional home; Sheepfold, a feeding program affiliated with the United Way; Families Forward, a homeless provider; Olive Crest, transitional homes and services for abused and neglected children, and Laurel House, an emergency shelter and transitional housing provider for homeless youth in the City.

Additional programs have been provided at the Tustin Legacy site. A Homeless Assistance Plan has been established for MCAS, Tustin that is consistent with the continuum of care model embodied in the Consolidated Plans for the Cities of Tustin and neighboring Irvine. The fundamental components of the continuum of care system implemented with the MCAS Tustin Specific Plan:

- Provide emergency shelter beds and intake assessment
- Offer transitional housing and services
- Provide opportunities for permanent affordable housing by the private sector.

In Tustin Legacy, four homeless service providers including the Salvation Army, Orange Coast Interfaith Shelter, Families Forward, and Human Options currently are operating 48 family units. The Orange County Rescue Mission operates a 192-unit transitional/emergency shelter (Village of Hope) and the Orange County Social Services Agency operates a 90bed facility for abused and neglected children and their families.

Numerous other agencies provide shelter and other services to the homeless in the nearby cities of Santa Ana, Irvine, and Orange. Table H-8 is a list of organizations in Tustin that provide homeless services.

**TABLE H- 8  
EMERGENCY SHELTER/TRANSITIONAL  
HOUSING FACILITIES**

Facility	Services Provided
<b>Sheepfold</b>	Provides shelter, food, clothing, job training, and job-referral services to women with children.
<b>Laurel House</b>	Temporary housing for teenagers in crisis. The facility also provides food, informal counseling, and access to medical care and clothing.
<b>St. Cecilia's</b>	Distributes food supplies to needy populations.
<b>Redhill Lutheran</b>	Operates emergency food program where a person can receive food supplies.
<b>Tustin Presbyterian</b>	Collects food supplies and distributes the food to various organizations involved in providing homeless services.
<b>Aldergate</b>	Refers interested persons to Ecumenical Services Alliance in Santa Ana.
<b>Village of Hope</b>	Operates a food service program and 192 units transitional home at the Village of Hope operated by the Orange County Rescue Mission
<b>Tustin Family Campus</b>	90-bed intermediate care shelter for abused children and their parents operated by the Orange County Social Services Agency.
<b>Salvation Army</b>	Six (6) transitional units at Tustin Field I operated by Salvation Army.
<b>Salvation Army</b>	Acquisition of 16 transitional units in Buena Park operated by Salvation Army. The City assisted in acquisition and contributed grant funds to acquire the units
<b>Families Forward<sup>1</sup></b>	Fourteen (14) transitional units at Columbus Grove operated by Families Forward, formerly Irvine Temporary Housing in Irvine.
<b>Human Options</b>	Six (6) transitional units at Columbus Grove operated by Human Options
<b>Orange Coast Interfaith Shelter</b>	Six (6) transitional units at Columbus Grove operated by Orange Coast Interfaith Shelter.
<b>Tustin Family and Youth Center</b>	Distributes food supplies to needy populations.

<sup>1</sup> Although these units are located in the City of Irvine, these units were negotiated as part of the base realignment/conveyance process which Tustin is the Local Redevelopment Authority designated by the Department of Navy.

Source: City of Tustin, 2013

Additional discussion regarding land use regulations that apply to facilities serving the homeless is found in the Housing Constraints section of this document and in the Technical Memorandum.

## **PRESERVATION OF UNITS AT RISK OF CONVERSION**

According to the 2012 RHNA, Tustin has one project that contains units at risk of converting to unrestricted market rate during the 2013-2021 planning period. Tustin Gardens is a 101-unit Section 223(a) (7)/221(D) (4) project with a Section 8 contract for 100 units Tustin Gardens is extended on an annual basis. Their current contract is due to expire on July 13, 2014. Although Tustin Gardens is at risk, there has been no indication from HUD of terminating the contract or from the project owners of opting out.

Table H-9 is an inventory of all units assisted under federal, state, and/or local programs, including HUD programs, state and local bond programs, City programs, and local in-lieu fee, inclusionary, density bonus, or direct assistance programs. The inventory includes all units that are eligible to convert to non-lower income housing uses due to termination of subsidy contract, mortgage prepayment, or expiring use restrictions.

Various restrictions and incentives affect the likelihood that at risk units will convert to other uses. Congress passed the Low Income Housing Preservation and Resident Homeownership Act (LIHPRHA) in 1991. This measure assured residents that their homes would be preserved for their remaining useful lives while owners were assured of fair-market compensation. However, modifications to the Act in 1996 restored the owners' right to prepayment, under the provisions that the owner would be encouraged to sell the property to resident endorsed or other non-profit organizations.

Tustin Gardens is the only project based Section 8 subsidized project at-risk of losing affordability restrictions during the Housing Element planning period. However, it appears unlikely that the affordability of these units will be threatened based on the determination that project based Section 8 contracts can be renewed on an annual basis.

Given the relative weakness of economic conditions and the current housing market, the city will proceed to negotiate the extension of affordability restrictions on these units. The amount of assistance provided will be negotiated based on the specific economics of each development and the potential availability of leverage financing, such as tax-exempt bonds and 4% tax credits. Funds were previously allocated to this program in prior planning periods. However, as a result of the dissolution of Redevelopment, the Low and Moderate Income Housing Funds, allocated to this program were recaptured by the State and transferred to the

Orange County Auditor-Controller for distribution to the appropriate taxing entities.

**Programs for Preservation of At-Risk Units:** The City will make efforts to preserve units “at risk” at Tustin Gardens. The cost of acquiring and preserving the at-risk units is less than replacing the units with new construction. The actual amount required to preserve these units is currently unknown.

The City will also be looking at possible work with nonprofits in the community to explore acquisition of existing buildings with at risk units by nonprofit organizations. The specific actions that the City will take to protect (or replace) at-risk units are identified in the Housing Element Implementation Program.

**TABLE H- 9  
ASSISTED HOUSING INVENTORY**

<b>Project Name, Address (incl. zip)</b>	<b>Owner: Name, Address, Tel. #</b>	<b>Type(s) of Gov't Assistance</b>	<b>Type/Length of Affordability Controls (including Sec. 8)</b>	<b>Earliest Potential Conversion Date(s)</b>	<b># of Units</b>	<b>Tenant Type (i.e., Elderly, Family)</b>	<b>Bedroom Mix</b>	<b>Date Built (if known)</b>	<b>Condition (if known)</b>
<b>FEDERAL</b>									
Tustin Gardens E. 6th Tustin, CA 92780 213-204-2050	Goldrich & Kest 5150 Overland Ave. Culver City, CA 90230	HUD 223(a)(7)/221(D)(4) Section 8	---	July/2014	101 100	Elderly	101 1-br	1979	Good
Kenyon Pointe 17021-17121 Kenyon Drive Tustin, CA 92780	RPK Development 2566 Overland Ave. Suite 700 Los Angeles, CA 90064	HUD 207/223(f)		January 2040	71	Family		1964	Good
<b>STATE</b>									
Westchester Park (Orange Gardens) 1602 Nisson Rd. Tustin, CA 92780	Westchester Park, L.P.	California Tax Credit Allocation Committee	Income restricted. No rent restrictions	10/2029	150	Family	17-1br 93-2br 40-3br	N/A	Good
Flanders Pointe 15520 Tustin Village Way Tustin, CA 92780	Tustin Affordable Housing Corp.	California Statewide Communities Development	Income restricted. No rent restrictions	10/2029	49	Family	41-2br 7-2-br	1966	Good

**TABLE H- 9  
ASSISTED HOUSING INVENTORY**

<b>Project Name, Address (incl. zip)</b>	<b>Owner: Name, Address, Tel. #</b>	<b>Type(s) of Gov't Assistance</b>	<b>Type/Length of Affordability Controls (including Sec. 8)</b>	<b>Earliest Potential Conversion Date(s)</b>	<b># of Units</b>	<b>Tenant Type (i.e., Elderly, Family)</b>	<b>Bedroom Mix</b>	<b>Date Built (if known)</b>	<b>Condition (if known)</b>
		Authority, 1999							
Coventry Court 16000 Cambridge Way Tustin, CA 92782 714.389.1188	Meta Housing Corporation 1640 S. Sepulveda Blvd., Suite 425 Los Angeles, CA 90025	CTCAC	Regulatory Agreement	July 2067	153	Senior	80-1br 73-2br	2012	Excellent
<b>LOCAL</b>									
Tustin Grove Tustin, CA 92780	Tract 14934	Redevelopment Agency	DDA <sup>1</sup>	N/A	21	Family	21-3br	N/A	Very Good
Ambrose Lane Tustin, CA 92780	Tract 15707	Redevelopment Agency	DDA <sup>1</sup>	N/A	5	Family	5-3br	N/A	Very Good
Heritage Place Tustin, CA 92780	Tustin Heritage Place, L.P.	County Revenue Bonds, Tax Credits, RDA Loans	Income restricted, Senior 62+	04/2057	54	Senior	42-1br 12-2br	2001	Very Good
Chatam Village (Hampton Square) 16331 McFadden	Fairfield Residential Corp.	Southern California Home Finance Agency	Income restricted. No rent	2026	210	Family	124-1br 86-2br	1969	Good

**TABLE H- 9  
ASSISTED HOUSING INVENTORY**

<b>Project Name, Address (incl. zip)</b>	<b>Owner: Name, Address, Tel. #</b>	<b>Type(s) of Gov't Assistance</b>	<b>Type/Length of Affordability Controls (including Sec. 8)</b>	<b>Earliest Potential Conversion Date(s)</b>	<b># of Units</b>	<b>Tenant Type (i.e., Elderly, Family)</b>	<b>Bedroom Mix</b>	<b>Date Built (if known)</b>	<b>Condition (if known)</b>
Ave. Tustin, CA 92780			restrictions						
Tustin Field I Tustin, CA 92782	Various owners	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	78	Family	27-2br 51-3br	2006	Excellent
Tustin Field II Tustin, CA 92782	Various owners	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	40	Family	40-3br	2007	Excellent
Arbor Walk Tustin, CA 92780	Various owners	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	10	Family	10-3br	2006	Excellent
Cambridge Lane Tustin, CA 92782	Various owners	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	50	Family	11-1br 13-2br 12-3br	2006-2007	Excellent
Camden Place Tustin, CA 92782	Various owners	Redevelopment Agency	Ownership income	45 years of initial	63	Family	22-2br 15-3br	2006-2007	Excellent

**TABLE H- 9  
ASSISTED HOUSING INVENTORY**

<b>Project Name, Address (incl. zip)</b>	<b>Owner: Name, Address, Tel. #</b>	<b>Type(s) of Gov't Assistance</b>	<b>Type/Length of Affordability Controls (including Sec. 8)</b>	<b>Earliest Potential Conversion Date(s)</b>	<b># of Units</b>	<b>Tenant Type (i.e., Elderly, Family)</b>	<b>Bedroom Mix</b>	<b>Date Built (if known)</b>	<b>Condition (if known)</b>
			restricted.	purchase date					
Clarendon Tustin, CA 92782	Various owners	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	42	Family	42-3br	2006-2007	Excellent
<b>TOTAL</b>					1,197				

N/A - Not available

<sup>1</sup> DDA - Disposition and Development Agreement

Source: Comprehensive Housing Affordability Strategy 2008 -2018, City of Tustin

## SUMMARY OF HOUSING ISSUES

Housing is a fundamental component of land use within a community necessary to support the resident population. Obtaining affordable housing has been an ongoing issue for persons of all income groups in California. The following Table H-10 presents an overview of households in the City with special housing needs or issues with their existing housing, such as overpayment or overcrowded conditions. The following text highlights the issues relevant to the City of Tustin, which are addressed by the goals, policies and implementation plans.

**TABLE H- 10  
SUMMARY OF EXISTING HOUSING NEEDS  
CITY OF TUSTIN**

2014-2021 Growth Needs <sup>1</sup>		Special Needs Group	
Very Low (Units)	283	Elderly Persons <sup>2</sup>	6,492
Low (Units)	195	Disabled Persons	4,440
Moderate (Units)	224	Large Households <sup>3</sup>	3,852
Above-Moderate (Units)	525	Female-Headed Households with Children under 18 years	1,652
<b>TOTAL</b>	<b>1,227</b>		
Overcrowding		Overpaying Households	
Renter	1,955	Renter - Total	6,617
<i>Percent renter</i>	16.5%		
Owner	553	Owner - Total	5,845
<i>Percent owner</i>	4.2%		
<b>TOTAL</b>	<b>2,508</b>	<b>Total</b>	<b>12,462</b>

<sup>1</sup> Regional Housing Needs Assessment, SCAG, 2012.

<sup>2</sup> Persons age 65 and over.

<sup>3</sup> Households containing 5 or more people.

Sources: U.S. Census 5 Year and 3 Year ACS; Comprehensive Affordable Housing Strategy 2008-2018.

- Overpayment. 49 percent of the City's lower income households (households which earn less than \$75,000 annually) are currently overpaying for housing (see Table HTM-12).
- Overcrowding. Household overcrowding has decreased over the past decade as fewer individuals and families "double up" to save on housing costs. Housing Growth Needs. For the 2014-2021 planning period, SCAG identifies a housing growth need of 1,227 dwelling units in Tustin. These units are allocated among the following income categories: 525 above-moderate income units; 224 moderate-income units; 195 low-income units; and 283 very-low income units (see Table H-10).

- Large Families. 15.4 percent of City’s households contain 5 more persons in the households. The average household size in the City was 2.97 in 2011, up slightly from 2.82 in 2000, largely due to changes in the ethnic composition and the economic downturn which had not yet recovered by 2011. This indicates a potential need for larger housing units to accommodate these families (see Table HTM-14).
- Extremely-Low Income households. In 2009, 2,458 households are at or below 30% of the Area Median Income (AMI) and considered “Extremely Low Income.” While the extremely low income households are currently housed, they are in a precarious position, particularly those overpaying for housing in light of the current housing market, and could face the threat of homelessness.
- Affordability Gap. Based upon available information on rental rates in the City, it is difficult to find rental housing that is large enough and affordable for large, low-income families (see Table HTM-24 and Table HTM-25).
- Elderly. As the City’s population ages, the number of elderly persons will continue to increase. This underscores an increasing need to address the special housing needs of the elderly (see Table HTM-2).
- Disabled, including Developmentally Disabled. Some disabled individuals have particular housing needs relating to access and adaptability.
- Female-Headed Parent Households. Female-headed parent households made up 9.4 percent of all families with children under 18 in Tustin in 2011. Many of these households have incomes below the poverty level and have special housing needs such as access to childcare services.
- Homeless. Growing numbers of homeless persons in Southern California have created particular housing and social service needs. The redevelopment of MCAS Tustin for civilian uses has provided an opportunity for additional housing supply in the City including accommodation of the needs of the homeless and the need for affordable housing (see Table HTM-15). In addition, a group housing arrangement (with less than six (6) residents) in a single family home is not subject to a Conditional Use Permit (consistent with State Law). A group housing arrangement of over six (6) residents is classified as a boarding house. The R-3 and R-4 zoning districts would allow for boarding houses with a Conditional Use Permit (CUP).
- First Time Homebuyers. High housing costs have put home ownership beyond the reach of many potential first-time homebuyers.

- **Governmental Constraints.** Governmental regulations, such as land use controls, fees, and processing procedures, can act as constraints to the maintenance and production of housing.
- **Units at Risk of Conversion to Market Rate.** By State law, the City must identify and develop programs and policies to address affordable housing units that are at risk of converting to market rate housing. During the 2013-2021 planning period, the City of Tustin faces the potential conversion of 100 low-income units (see Table HTM-27).
- **Tenure.** The City has a high proportion of renter-occupied housing as compared to other jurisdictions in Orange County. In 2011, 47.4 percent of the City's units were renter-occupied, compared to 39.7 percent renter occupied units countywide. Promotion of home ownership opportunities in the City may be necessary to maintain a balanced community (see Table HTM-20).
- **Housing Stock Condition.** According to 2011 ACS data, over 56percent of the City's housing stock is 30 years old or older - the age at which housing typically begins to require major repairs. In addition, the lack of adequately sized affordable housing can lead to overcrowding and in turn, deteriorated housing conditions. Maintenance and improvement of existing housing conditions over the long term will require ongoing maintenance of existing units, rehabilitation or replacement of substandard housing and programs to maintain neighborhood quality (see Table HTM-21).
- **Historic Resources.** Older neighborhoods in Tustin contain historic residences that should be preserved as part of the community's heritage. These historic homes were identified through inventories of historic buildings in 1990 and 2002.
- **Target Neighborhoods.** A large portion of the City's lower income housing is concentrated in the southwest neighborhoods. Targeted programs such as graffiti removal, proactive code-enforcement, loan and grant housing rehabilitation program, removal of abandoned vehicles, increased police presence, removal/trimming overgrown trees in public right-of-way, various physical improvements for street widening, and street lighting and alley improvements have been and will continue to be implemented.
- **Energy Conservation.** Due to its mild climate, the City can take advantage of solar energy to reduce reliance on non-renewable energy supplies.

## HOUSING CONSTRAINTS

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Actual or potential constraints on the provision and cost of housing affect the development of new housing and the maintenance of existing units for all income levels. Market, governmental, infrastructure, and environmental constraints to housing development in Tustin are summarized below and discussed in greater detail in the Housing Element Technical Memorandum.

### **Market Constraints**

The high cost of renting or buying adequate housing is a primary ongoing constraint. High construction costs, land costs and market financing constraints are contributing to increases in the cost of affordable housing.

*Construction Costs:* The 2005-2010 Tustin Consolidated Plan reports that the single largest cost associated with building a new house is the cost of building materials, usually comprising between 30 to 50 percent of the sales price of a home. These costs are influenced by many factors such as the cost of labor, building materials, and site preparation. Marshall & Swift is widely considered the authority on estimating these costs and has been providing the real estate industry with cost data for more than 75 years. According to Marshall & Swift estimates, the cost of residential wood frame construction averages \$96.30 per square foot<sup>5</sup>. This estimate includes labor and materials, excluding the cost of land, off-site improvements, and indirect costs such as financing costs, escrow fees, property tax, etc. The costs attributed to construction alone for a typical 2,200 square foot, wood frame home would be at minimum \$211,860.

A reduction in amenities and quality of building materials (above a minimum acceptability for health, safety, and adequate performance) could result in lower sales prices. Additionally, pre-fabricated, factory built housing may provide for lower priced housing by reducing construction and labor costs. An additional factor related to construction costs is the number of units built at the same time. As the number of units developed increases, construction costs over the entire development are generally reduced, based on economies of scale. This reduction in costs is of particular benefit when density bonuses are utilized for the provision of affordable housing. Although it should be noted that the reduced costs are most attributed to a reduction in land costs; when that cost is spread on a per unit basis.

*Land:* Although the Consolidated Plan 2010-15 reported that the single largest cost was related to construction costs, other factors such as the cost of land, depending upon the type of residential product and market condition is often a more significant cost than that of labor and materials. With the exception of the former MCAS Tustin site that is now referred to as Tustin Legacy, the City of Tustin is

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<sup>5</sup> Wood frame average quality for Orange County area in 2013

generally built out. This scarcity of land within the developed areas of the City and the price of land on the fringes are constraints adding to the cost of housing and pricing housing out of the reach of low- to moderate-income families.

*Financing:* Interest rates can have an impact on housing costs. Some mortgage financing is variable rate, which offers an initial lower interest rate than fixed financing. The ability of lending institutions to raise rates to adjust for inflation will cause existing households to overextend themselves financially, and create situations where high financing costs constrain the housing market. An additional obstacle for the first-time homebuyer is the minimum down-payment required by lending institutions.

Even if Tustin homebuyers are able to provide a 3 percent down-payment and obtain a 3.6 percent 30-year loan (average loan rate for FHA or VA guaranteed loans for May 2013), monthly mortgage payments on median priced single-family detached homes in the City place such homes out of the reach of moderate and lower-income households in the City. At a 3.6percent interest rate, monthly mortgage payments on median priced condominiums and townhouses can place such units out of reach of Tustin's low and very low income households (see Tables HTM-23 and HTM-25).

The greatest impediment to homeownership, however, is credit worthiness. According to the Federal Housing Authority, lenders consider a person's debt-to-income ratio, cash available for down payment, and credit history, when determining a maximum loan amount. Many financial institutions are willing to significantly decrease down payment requirements and increase loan amounts to persons with good credit rating. Persons with poor credit ratings may be forced to accept a higher interest rate or a loan amount insufficient to purchase a house. Poor credit rating can be especially damaging to lower-income residents, who have fewer financial resources with which to qualify for a loan. The FHA is generally more flexible than conventional lenders in its qualifying guidelines and allows many residents to re-establish a good credit history.

*Profit, Marketing and Overhead:* According to the Comprehensive Affordable Housing Strategy<sup>6</sup>, minimum developer profit is estimated at 12 percent of development costs, based on input from developers and the Building Industry Association. This level is considered a baseline profit or "hurdle rate," representing the minimum necessary for the deal to proceed. In the past, due to high market demand in communities like Tustin, developers were able to command for higher prices and realized greater margins for profit. As demand increased and prices rose, this profit margin was impacted by the escalating costs of land resulting from a shrinking supply of land. Marketing and overhead costs also add to the price of

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<sup>6</sup> City of Tustin Comprehensive Affordable Housing Strategy, 2008 - 2018.

homes. The Comprehensive Affordable Strategy 2008 - 2018 estimated developer overhead is at 4 percent of total development costs.

### **Governmental Constraints**

Housing affordability is affected by factors in the private and public sectors. Actions by the City can have an impact on the price and availability of housing. Land use controls, site improvement requirements, building codes, fees and other local programs intended to improve the overall quality of housing may serve as a constraint to housing development.

**Land Use Controls:** In efforts to protect the public's health, safety, and welfare, government agencies may place administrative constraints on growth through the adoption and implementation of land use plans and ordinances. The General Plan may restrict growth if only limited areas are set aside for residential land uses, and if higher residential densities are not accommodated. The zoning ordinance may impose further restrictions if development standards are too rigid, or if zoning designations do not conform to existing land uses. On the contrary, the zoning ordinance may also be utilized as a tool in encouraging and directing affordable housing, i.e. relaxed development standards, higher density, provision of incentives (waiver of fees, expedited review process, etc.) in exchange of the production of affordable housing, etc.

Tustin's existing zoning ordinance allows for a range of residential densities from an effective density of 4.35 units per net acre in the E-4 Residential Estate District to 24.9 units per net acre in the R-3 Multiple Family Residential District. Tustin's General Plan allows a maximum of seven (7) units per acre with effective density of 5.61 dwelling units per acre within the Low Density Residential land use to a maximum of 25 units per acre with effective density of 21.53 dwelling units per acre within High Density Residential land use. Ten (10) units per net acre are also permitted in the MHP Mobile home Park District (see Table HTM-32). The Planned Community District has authorized residential subdivisions with single-family lots of 3,500-5,000 net square feet, which significantly increases density potential. The Planned Community Development also provides incentives such as no height limits when certain criterion are met and for innovative designs that incorporate small lots, residential clustering, mixed density, and mixed income types which also provides flexibility in overall density.

Within the Multi-Family Residential District (R-3), a 35 foot height limitation and 65 percent coverage precludes the development of housing projects with building height above the 35 foot limitation. In the interest of protecting adjoining single-family lot owners, multifamily structures above 20 feet in height require a conditional use permit when the structures are within 150 feet of single-family residentially zoned lots. There are approximately 20 properties with an R-3 zoning designation that abut Single Family Residential (R-1) zoning comprised of a variety of

older apartment units and several parcels within Old Town Tustin that are adjacent to the First Street commercial zoning areas. While these height limits may place some restrictions on housing development, these limits are designed to maintain compatibility of land use intensity and to ensure proper and effective transportation within the community and are commonly used by local governments as a development tool to further this ideal. When designed properly with features such as limited windows and door openings along the walls facing single family zoned properties or using stepped building heights and design to minimize intrusion to the privacy of existing residents, Conditional Use Permits to allow such development projects have been granted.

Conversely, within Neighborhood D of the MCAS Tustin Specific Plan, a 150 foot height limitation up to 180 foot if approved by the Community Development Director would be allowed which provides for layering products (i.e. stacked flats, podium style, etc.) with mixed use developments, thereby providing opportunities for the development of higher density residential products.

The Land Use Element indicates that residential development that supports commercial uses may also be permitted in the City's Old Town Commercial area. A market analysis of the Old Town area prepared in conjunction with comprehensive 1994 General Plan Amendments indicated that new multi-family residential development would be an important supporting use for the area's mixed-used commercial/retail development. As a result, the General Plan was amended in 1997 to permit up to 291 additional residential units in the Old Town commercial area. To ensure compatibility of residential uses with the commercial area, the location, density, and building intensity standards for these residential units will be governed by planned community regulations, the adoption of a specific plan, or the approval of a Conditional Use Permit.

The East Tustin Specific Plan provides for single-family detached products to be developed at a variety of densities. The Low Density designation requires a minimum lot area of 5,000 net square feet while the Medium-Low designation requires a minimum lot area of 3,000 net square feet and densities not to exceed 5 and 10 units per net acre respectively.

The MCAS Tustin Specific Plan designation provides opportunities for development of a variety of residential products at varied density ranging up to 25 dwelling units per acre. In addition, the Specific Plan allows for density bonuses and density averaging. For example, in Neighborhood D, the maximum density on an individual parcel may exceed 25 units per acre as long as the total dwelling units allocated to Neighborhood D is not exceeded. Consistent with the City's policy to increase homeownership to maintain a balanced community, the majority of residential units authorized within the Specific Plan are owner-occupied units. However, in response to market demand, the City processed an amendment to the

MCAS Tustin Specific Plan that allowed for additional renter-occupied units, including affordable rental units.

The Final Joint EIS/EIR for the Disposal and Reuse of the MCAS-Tustin (hereafter referred to as Program EIS/EIR for MCAS-Tustin) for the reuse of the base identifies specific improvements needed to support residential development. The build out of the MCAS Tustin Specific Plan is expected to occur incrementally over a 20+ year timeframe. The actual level of development within any given phase will be tied to the availability of infrastructure necessary to support such development. Implementation triggers of specific infrastructure improvements are included in the EIS/EIR for the project.

The anticipated timing of residential development of the MCAS-Tustin Specific Plan is as follows:

**TABLE H- 11  
Anticipated Development at MCAS-Tustin**

Land Uses	Through 2015	2016-2025
Low Density (1-7 DU/acre) Planning Area 15		533
Medium Density (8-15 DU/acre) Planning Area 15	375	114
Medium to High Density (16-25 DU/acre) Planning Area 15	225 <sup>1</sup>	
Community Core (16-25 DU/acre <sup>2</sup> ) Planning Area 8, 13, and 14	533 <sup>1</sup>	515 <sup>2</sup>
<b>Total</b>	<b>1,133</b>	<b>1,162</b>

<sup>1</sup> Includes combined total of 190 density bonus units.

<sup>2</sup> Pursuant to the MCAS Tustin Specific Plan, the maximum density on an individual parcel in Planning Areas 8, 13, and 14 may exceed 25 dwelling units per acre as long as the total dwelling units allocated to Neighborhood D is not exceeded.

Notes: All figures are estimates as schedule will be impacted by market conditions. Figures in text are rounded for discussion purposes. Figures are based on estimated anticipated development indicated in the environmental document for MCAS Tustin Specific Plan. Actual construction figures may be different.

Source: Final Joint EIS/EIR for the Disposal and Reuse of MCAS-Tustin, MCAS Tustin Specific Plan/Reuse Plan and its Supplement and Addendum, City of Tustin.

Future market demand and the complexity and timing of environmental cleanup efforts are additional factors influencing the schedule of development.

The remaining opportunity sites consist of a large proportion of small vacant and underutilized land that is located within the City or Old Town residential areas where infrastructure is available and no major improvements would be anticipated.

Limited residential uses are also permitted in areas designated Public/Institutional provided the intended occupants are associated with the primary institutional uses. Additionally, homeless facilities are permitted by right in the MCAS Tustin Specific Plan and are allowed throughout the remainder of the City either as an outright permitted or conditionally permitted use depending on the number of residents in the project.

The City's Zoning Ordinance calculates parking requirements by unit type (See HTM-32 for summary of parking requirements). Parking requirements in Tustin are generally two spaces per unit, with an additional requirement of one guest space per every four units in multi-family development. Carports for multi-family units are permitted which would reduce development costs in contrasts to the provision of garages. Furthermore, affordable and senior housing development meeting the State Density Bonus Law would be eligible to use the reduced parking standards under the State Law.

In response to State mandated requirements and local needs, the City has adopted ordinances allowing for the development of accessory rental units and density bonuses. Beyond local requirements, state law created a sliding scale which allows developers to increase the density of a residential development by at least 20 percent up to 35 percent provided that certain numbers of units are allocated for lower and moderate-income housing.

In addition, in response to state-mandated requirements and local needs, the City allows for second dwelling units. Second units serve to augment resources for senior housing and the needs of other segments of the population. Second dwelling units are outright permitted in residentially zoned properties that are at least 12,000 square feet in lot size. A two-car garage is required.

The City's land use regulatory mechanisms accommodate the development of housing at a range of densities and products and do not constrain the potential for new construction at densities suitable to meet the needs of all income ranges, although assistance may be required for units offered at prices affordable to lower income households.

### **Housing for Persons with Disabilities/Reasonable Accommodation**

The City of Tustin recognizes the importance of addressing the housing needs for persons with disabilities. The City's Zoning Code defines "family" as "an

individual or two (2) or more persons living together as a single housekeeping unit in a dwelling unit.” This definition accommodates unrelated persons living together in a dwelling unit; thus, the City’s definition for a family would not constrain the development and rehabilitation for persons with disabilities.

The City requires each development to comply with Title 24 of the California Code. All multi-family complexes are required to provide accessible parking spaces based upon the prescribed State code requirements. For development of special needs housing such as housing for the disabled, senior housing, etc., parking requirements would be determined based upon parking demand analysis which by nature would allow for lower parking ratio in comparison to those required for multiple family residential units. In addition, an off-street parking ordinance adopted by the City allows for the reduction in parking due to an American with Disabilities Act (ADA) upgrade. The Community Development Director is authorized to allow the reduction in the number of required parking spaces when the site is brought up to ADA standards. This provision provides incentives to property owners to provide reasonable accommodation to the disabled.

The City also requires new multi-family housing units and apartment conversions to condominiums to comply with State specifications pursuant to SB 520 for accommodation of the disabled.

A Residential Care facility serving six (6) or fewer persons is a permitted use in all residential districts. The City’s Zoning Ordinance does not contain maximum concentration requirements for a residential care facility serving six (6) or fewer persons.

The City recognizes the need of disabled persons to retrofit their residences to allow for mobility such as wheelchair ramps, widened doorways, grab bars, and access ramps. When these improvements meet development standards, only a building permit is required. In 2011, the City amended the Zoning Code to remove governmental constraints to reasonable accommodation for the disabled. The amendment provides a process in which deviations from the development standards associated with physical improvements to accommodate the disabled would be accommodated with administrative approval and without the need of a public hearing.

### **Homeless Accommodation**

Homelessness is a statewide concern that affects many cities and counties. Throughout the country, homelessness has become an ongoing problem. Factors contributing to homelessness include the general lack of housing affordable to low and moderate income persons, increases in the number of persons whose incomes fall

below the poverty level, reductions in public subsidy to the poor, and the deinstitutionalization of the mentally ill. The issue of homelessness is considered regional in nature. Nomadic tendencies of homeless persons make it difficult to assess the population accurately.

Within the City of Tustin, Police reports and windshield surveys indicate limited numbers of persons on the street and have shown that there are no established areas where homeless persons congregate in the City and that most persons migrate through Tustin to other areas within Orange County, rather than stay for extended periods of time. Information regarding the nature and extent of homelessness by racial and ethnic groups is not available at this time. The Orange County Partnership, a non-profit organization whose purpose is to strengthen public and private agencies serving the homeless and those at risk of homelessness, reported that in 2009 there were 10 homeless persons who identified Tustin as the city of last known permanent address. The McKinney-Vento Homeless Education Assistance Act reported 55 homeless children and youth enrolled in the Tustin Unified School District during 2006-07.

In addition to identifying homeless needs in Tustin, pursuant to Senate Bill (SB) 2, statute of 2007, the City is required to engage in a more detailed analysis of emergency shelters, transitional, and supportive housing (See Technical Memorandum for further details) by identifying the needs for homeless shelters in its Housing Element and designating adequate zoning districts to accommodate the needs. In those districts, emergency shelters must be allowed without a conditional use permit or other discretionary permit.

With the closure of the Marine Corps Air Station (MCAS) Tustin, the City was provided with opportunity to address homeless accommodation. As part of the conveyance process and under the Base Closure Community Redevelopment and Homeless Assistance Act of 1994 (The "Redevelopment Act"), the City of Tustin as, the Local Redevelopment Authority (LRA) was required to consider the interest of the homeless in buildings and property on the base in preparing the Reuse Plan (MCAS Tustin Specific Plan/Reuse Plan). In developing the Reuse Plan, one criteria the Secretary of Housing and Urban Development (HUD) utilized to determine the adequacy of the Reuse Plan was whether the Plan considered the size and nature of the homeless population in the communities, in the vicinity of the installation, and availability of existing services in such communities to meet the needs of the homeless in such communities.

At the time of the preparation of the Reuse Plan, it was estimated that there was a total net homeless need of 411 persons in the City of Tustin and City of Irvine (A portion of the MCAS Tustin is located within the City of Irvine jurisdiction). A large portion of this homeless need was identified as necessary to support

emergency transitional housing for youth and individuals. The local homeless need as described in both Tustin and Irvine's Consolidated Plans also indicated a gap in the continuum of care in the areas of vocational and job training/educational opportunities, some emergency and transitional housing units for individuals and families, support services, and affordable ownership units. Accordingly, the Homeless Assistance Plan for MCAS Tustin was adapted to address the problem of homelessness by utilizing the continuum of care model promulgated by HUD for accommodating the needs of the homeless in a manner which is consistent with the Consolidated Plans approved for the cities of Tustin and Irvine.

The fundamental components of the continuum of care system implemented with the MCAS Tustin Reuse Plan:

- Provides emergency shelter beds;
- Offers transitional housing and services which enable homeless persons to progress to self-sufficiency; and
- Provides opportunities for permanent affordable housing by the private sector.

As a result, the adopted MCAS Tustin Specific Plan provided sites and designated land uses to accommodate the identified homeless needs. The following sites were set aside in implementing the homeless accommodation at Tustin Legacy (formerly MCAS Tustin):

- An approximate five (5) acre transitional/emergency shelter site was set aside for accommodation of the homeless at MCAS Tustin. The City acquired a site from the Department of Navy; initially ground leased the site, and ultimately conveyed the site to the Orange County Rescue Mission at no cost and facilitated the construction of Village of Hope, a 192 unit transitional housing facility, without the need for a Conditional Use Permit. The project has been completed.
- A four (4) acre site was recommended by the City of Tustin and deeded directly by the Department of Navy at no cost to the Orange County Social Services Agency for the development of an abused and neglected child and emancipated youth facility with 90 beds capacity. The project is complete.
- A total of 50 transitional housing units were originally included in the Base Reuse Plan. Based on further negotiations with non-profit homeless providers, a total of 32 new transitional housing units were constructed and conveyed at no cost to non-profit homeless providers at Tustin Legacy. These units are dispersed throughout the Tustin Legacy community to allow

integration into the community. The sites are designated as residential sites and the units were constructed in conjunction with market rate units subject to only those restrictions that apply to other residential uses. The units are transparent since the units are developed identical to those of market rate units in terms of size, materials, locations, etc. No special or other entitlement applications were required for the creation of these units other than those typically required for development of residential units at Tustin Legacy. In addition to the homeless accommodation on-site at Tustin Legacy, the City also facilitated the purchase of a 16 unit transitional housing facility off-site for one of the homeless providers. The City subsidized the creation of these units through the use of housing set aside funds and Federal HUD Homeless Assistance funds.

In addition to the homeless accommodation, the City also encourages support services to support the community of continuum of care model to end the cycle of homelessness and to provide participants with tools to once again become contributing members of the community as follows:

- Private sector opportunities are provided to create a balanced mix of housing types on the base. Through inclusionary Zoning standards in the MCAS Tustin Specific Plan, a total of 879<sup>7</sup> affordable units or 20.8 percent of total authorized units at Tustin Legacy are required to allow participants with opportunity to achieve self-sufficiency. Specific affordable housing requirements would be established at the time of development project approval to ensure conformity with the Housing Element of the City's General Plan.
- The Navy will be transferring a child care facility at the former MCAS Tustin to the City of Tustin, which will provide opportunities for access for all to mainstream child care facilities, including early child care and education programs, Head Start, etc.
- Adult education and training opportunities will be provided by the South Orange County Community College District within the educational village.

**Emergency Shelters, Transitional Housing, and Supportive Housing:** SB 2 defines “Emergency Shelters” as housing for homeless purposes intended for occupancy of less than six (6) months, where no person is denied occupancy because of inability to pay. In the City of Tustin, emergency shelters are designated as permitted uses within Planning Area 3 of the MCAS Tustin Specific Plan. Planning Area 3 is a five

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<sup>7</sup> Includes 32 transitional housing units set aside for non-profit homeless providers.

(5) acre site that had been a no cost conveyance to the Orange County Rescue Mission for the development of an emergency/transitional shelter that is known as Village of Hope. The City facilitated the development of the Orange County Rescue Mission Village of Hope and waived permits fees as this was a public/private partnership. The project consists of 192 units available for emergency and transitional needs.

As of April 30,, 2013, the Orange County Rescue Mission Village of Hope was at 90% capacity, with a total of 173 homeless individuals consisting of homeless single men, single women, single women with children, single men with children, and two parent families. The largest homeless sub-population on the Village of Hope campus is single women with children. The Orange County Rescue Mission Village of Hope priority is to serve Tustin homeless population prior to taking any other referrals from other cities or the County. The Tustin Police Department actively refers individuals to the Village of Hope upon encounter. The Orange County Rescue Mission Village of Hope also provides a food service program of approximately 550 meals daily to the Armory.

Based upon the available data obtained from the Orange County Partnership and McKinney Vento Homeless Education Assistance Act, approximately 34-55 individuals reported either Tustin as their last known permanent address or enrolled within the Tustin Unified School District. This means that the City of Tustin is accommodating 137-158 homeless persons beyond its jurisdictional boundaries thereby accommodating a regional need. The City interviewed the Orange County Rescue Mission Village of Hope representative and the City was told that there are generally 5 vacant units and a minimum of five (5) percent vacancy is available at any given time. The Orange County Rescue Mission Village of Hope also indicated that the shelter has met above and beyond the City's conservative estimate of 55 homeless persons and that the shelter could accommodate the year-round needs and seasonal fluctuation in the amount of available beds.

Transitional housing is defined as rental housing for stays of at least six (6) months where the units are re-circulated to another person after a set period. This housing can take several forms, including group housing or multi-family units, and often includes supportive services component to allow individuals to gain necessary life skills in support of independent living. Tustin's Zoning Code accommodates transitional housing within several zoning districts depending on the project's physical structure: 1) transitional housing operated as a residential care facility is permitted/conditionally permitted depending on the number of occupants in residential districts; and 2) transitional housing operated as rental apartments, it is permitted by right as a multi-family residential use where multifamily housing is permitted.

Supportive housing is defined as permanent (no limit on the length of stay), provides supportive services and is occupied by low-income persons with disabilities and certain other disabled persons. Services may include assistance designed to meet the needs of the target population in retaining housing, career counseling, mental health treatment, and life skills. Tustin’s Zoning Code permits supportive housing as a residential use, provided supportive services are ancillary to the primary use.

Emergency shelters are permitted within Planning Area 1 of the MCAS Tustin Specific Plan. Transitional homes and supportive housing are also designated as permitted uses within Planning Areas 1 and 3 of the MCAS Tustin Specific Plan. Community care facilities such as group homes, foster homes, elderly care facilities, etc. with six (6) or fewer people are outright permitted within any residentially zoned property.

Table H 11-A summarizes zoning regulations for homeless accommodation.

TABLE H-11A SUMMARY OF HOMELESS ACCOMMODATION ZONING REGULATIONS		
Housing Type	Permitted/ Conditionally Permitted	Zoning
Emergency Shelters	Permitted	Planning Area 3 of MCAS Tustin Specific Plan
Transitional Home	Permitted	Planning Area 3 of MCAS Tustin Specific Plan; All residentially zoned properties
Supportive housing	Permitted	Planning Areas 1 and 3 of MCAS Tustin Specific Plan; All residentially zoned properties
Community Care Facility for six (6) or fewer	Permitted	All residentially zoned properties
Family care home, foster home, or group home for six (6) or fewer <sup>1</sup>	Permitted	All residentially zoned properties

<sup>1</sup> Includes congregate care facility, single room occupancy hotel, and children’s intermediate care shelter

Source: City of Tustin

The following are transitional homes that have been provided at Tustin Legacy.

- A 192-unit<sup>8</sup> emergency/transitional home at the Village of Hope operated by the Orange County Rescue Mission.
- A 90-bed intermediate care shelter for abused children and their parents operated by the Orange County Social Services Agency.
- Six (6) units at Tustin Field I operated by Salvation Army.
- Acquisition of 16 units in Buena Park operated by the Salvation Army. The City assisted in acquisition and contributed grant funds to acquire the units.
- Fourteen (14) units at Columbus Grove operated by Families Forward, formerly Irvine Temporary Housing.<sup>9</sup>
- Six (6) units at Columbus Grove operated by Human Options.
- Six (6) units at Columbus Grove operated by Orange Coast Interfaith Shelter.

With the exception of the emergency shelter, these units are transparent and dispersed throughout the community consistent with the City's goals and policies to provide adequate supply of housing to meet the need for a variety of housing types and the diverse socio-economic and to promote the dispersion and integration of housing for all socio-economic throughout the community.

The City's policies for homeless accommodation do not create constraints in the location of adequate emergency shelters, transitional homes, shelters, and supportive housing. In addition, current provision of homeless accommodation supports not only the need of the city but the county as well.

**Fees and Improvements:** Various fees and assessments are charged by the City and other outside agencies (e.g., school districts) to cover costs of processing permits and providing services and facilities, such as utilities, schools and infrastructure. These fees are assessed based on the concept of cost recovery for services provided.

Tustin is urbanized with most of the necessary infrastructure, such as streets, sewer and water facilities in place. Nonetheless, site improvements can significantly add to the cost of producing housing. Cost-effective site planning can minimize site improvement costs. The Housing Element Technical Memorandum describes in detail required site improvements and provides a list of fees associated with development (Table HTM-34)

Development fees are not considered a constraint to housing. However, fees do contribute to the total cost of development and impact the final purchase or rental price. The City, in conjunction with the preparation of the 2009 Housing Element also prepared the Affordable Gap and Leveraged Financing Analysis (Appendix A

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<sup>8</sup> As defined pursuant to the U.S. Census Bureau definition.

<sup>9</sup> Although these units are located in the City of Irvine, these units were negotiated as part of the base realignment/conveyance process with Tustin as the Local Redevelopment Authority.

of the Housing Element Technical Memorandum). The analysis evaluated development costs to arrive to per unit affordability gap in producing affordable units. Table 12 and Table 13 of the analysis summarize average per unit development processing and impact fee of \$29,277 to \$37,530 per unit for owner housing prototype and \$25,586 per unit for rental housing prototype (See Appendix A for specific development processing fees and analysis).

In response to the recent economic downturn, the City Council also adopted an economic stimulus program which allowed the payment of specific development fees for construction of new residential units to be deferred until either prior to final inspection or issuance of certificate of occupancy. This program provided direct and indirect assistance to developer of residential units in that reduced on-hand cash flow were required at time of permit issuance.

**Building Codes and Enforcement:** The City of Tustin adopts the Uniform Construction Codes, as required by State law, which establish minimum construction standards as applied to residential buildings. The City's building codes are the minimum standards necessary to protect the public health, safety and welfare and ensure safe housing. Only local modifications to the codes are made which respond to local climatic or geographic conditions and clarify administrative procedures.

Although not mandated to do so, the City has adopted the State Historical Code that relaxes building code requirements citywide for historic structures/buildings. Adoption of codes reduces rehabilitation costs.

**Local Processing and Permit Procedures:** The evaluation and review process required by City procedures contributes to the cost of housing. 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.

The Community Development Department serves as the coordinating agency to process development applications for the approval of other in-house departments such as Police, Public Works/Engineering, and Parks and Recreation. All projects are processed through plan review in the order of submission. The City has eliminated the potential increase in financing costs caused by a delay in permit processing by assigning priority to the plan review and permit issuance for low-income housing projects. If a complete application is submitted, all Design Review Committee members and plan checking departments simultaneously review the plans. The Design Review application does not require a public hearing or Planning Commission approval. The Tustin City Code authorizes the Community Development Director to approve development plans when findings can be made that the location, size, architectural features and general appearance of the proposed development will not impair the orderly and harmonious development of the area.

In making such findings, the Zoning Code provides items to be considered such as height, bulk, setbacks, site planning, exterior materials and colors, relationship of the proposed structures with existing structures in the neighborhood, etc. This code provision affords the developers with tools to design their projects and thus increase certainty of project's design review and approval. Project application which complies with all the development standards prescribed by the district in which the project is located would not be required to go through any other discretionary approval.

For Tustin Legacy, developments under the former Master Developer footprint (approximately 800 acres) are subject to the Legacy Park Design Guidelines to ensure compatibility of products proposed by vertical builders. The design guidelines present minimum design criteria for the achievement of functional, quality, and attractive development expected at the Tustin Legacy. The guidelines are intended to complement the MCAS Tustin Specific Plan district regulations and to provide staff, builders, design professionals, and other users with a concise document when dealing with Design Review process to avoid ambiguity.

Together the Zoning Code, Design Review provisions, the Legacy Park Design Guidelines, and the "one-stop" processing system provide certainty to developers seeking approval for the development of residential projects.

For projects of significant benefit to the low-income community, costs can be waived by the City Council.

**Workload:** Another governmental constraint is the number of staff and amount of staff time available for processing development projects. Since the workload is determined by outside and uncontrolled forces (economy and market for housing and availability of general fund revenue), a shortage of staff time may occur which could lead to increased processing time for development projects.

## **HOUSING OPPORTUNITIES**

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Table H-12 shows the existing and potential dwelling units permitted under each General Plan land use category, as well as the potential net increase within each category. Based on the City's Land Use Plan, Tustin has a residential holding capacity of approximately 29,821 dwelling units. The Land Use Plan provides for a mix of unit types and densities, including low-density single-family homes, medium density homes, higher density homes, and mixed-use projects that allow for a combination of commercial and residential uses.

A large portion of future residential development in the City of Tustin will take place in the MCAS Tustin Reuse Specific Plan area. The other large Specific Plan community in Tustin, Tustin Ranch (the East Tustin Specific Plan) has been built out.

**TABLE H- 12  
LAND INVENTORY AND RESIDENTIAL DEVELOPMENT POTENTIAL**

<b>Land Use Category</b>	<b>(1) Existing DUs</b>	<b>Gross Acres Vacant</b>	<b>Potential DUs/ Vacant</b>	<b>Gross Acres Under- Utilized</b>	<b>Potential DUs/ Underutilized</b>	<b>Potential DUs/ Vacant &amp; Underutilized</b>	<b>Effective General Plan Build-out</b>
Low Density Residential (1-7 du/ac)	2,977	0	0	0	0	0	2,977
Medium Density Residential (8-15 du/ac)	430	2.67	21 <sup>(3)</sup>			21 <sup>(3)</sup>	451
High Density Residential (15-25 du/ac)	10,360	12.68	247 <sup>(3)</sup>	12.85	319 <sup>(3)</sup>	566 <sup>(3)</sup>	10,926
Mobile Home Park (1-10 du/ac)	702	0	0	0	0	0	702
MCAS Tustin Specific Plan	2,105 <sup>(2)</sup>	177.1	2,105 <sup>(3)</sup>	0	0	2,105 <sup>(3)</sup>	4,210 <sup>(3)</sup>
PC Low Density Residential	2,874		0	0	0	0	2,874
PC Medium Density Residential	3,690	0	0	0	0	0	3,690
PC High Density Residential	4,356	0	0	0	0	0	4,356
<b>TOTAL</b>	<b>27,494</b>	<b>192.45</b>	<b>2,373<sup>(3)</sup></b>	<b>12.85</b>	<b>319<sup>(3)</sup></b>	<b>2,692<sup>(3)</sup></b>	<b>30,186</b>

(1) Number of existing housing units in the City of Tustin based on Tustin General Plan Land Use Element, 2008- Table LU-3 "Future Land Use Density/Intensity and Population Capacity of The Land Use Plan." DUs = dwelling units

(2) Tustin Field I and II, Columbus Square, Columbus Grove. Excludes 192 units of emergency housing and 90 units of transitional family housing.

(3) Does not include approved or potential density bonus units. 190 Density bonus units have been approved, but not yet completed within the MCAS Tustin Specific Plan area.

Source: Tustin General Plan Land Use Element, 2001.

## Housing Units Approved/Entitled and Under Construction

A total of 88 Very Low Income units, 73 Low Income units, 101 Moderate Income units, and 871 Above Moderate Income units were approved/entitled at the time of the preparation of this housing element as follows:

### *St. Anton Partners:*

This residential affordable multiple-family project was approved on November 6, 2012, and will consist of 225 affordable units, of which 88 units are set aside as Very Low Income units, 73 units for Low Income, and 64 units for Moderate Income households. Completion of the project is anticipated in spring of 2014.

### *The Irvine Company Legacy Villas:*

This residential multiple family project was approved on November 6, 2012, and will consist of 533 residences, including 37 units for Moderate Income households. Completion of the project is anticipated in spring of 2014.

Table H-14 illustrates the residential development potential of the vacant and underutilized land inventory in the City of Tustin. The Tustin Legacy site (formerly MCAS Tustin) presents the City with 180.67 acres suited for residential development that could accommodate an additional 2,105 units. During the planning period, the majority of the anticipated units will be accommodated at Tustin Legacy and is being implemented through both the adoption of a Specific Plan by the City and the adoption of a Redevelopment Project Area (dissolved in 2011). Based on State Redevelopment Law at that time and Specific Plan requirements, at least 15 percent of the units (607 units) constructed at the MCAS Tustin site will be affordable to Very-Low, Low, and Moderate-income households, of which at least 6 percent or 243 units must be affordable to Very Low-income households. The remaining 364 units would be distributed among the Low and Moderate income households by utilizing RHNA Low and Moderate income percentages. In addition to these inclusionary obligations, the acreage and densities permitted by the MCAS-Tustin Reuse Plan created 282 additional units for Very Low-income households (192 transitional housing units and 90 social services housing units).

Aside from MCAS Tustin, additional sites are located within the City. As a means to ensure affordability, the City may require developers to provide at least 15 percent of all units constructed or rehabilitated at prices affordable to Very Low, Low, and Moderate Income households.

The City aggressively negotiates affordable housing units within individual potential projects. An example of an approved infill site is the development of a fifty-four (54) unit affordable senior housing project on a 1.76 acre site. The project was granted a twenty-five (25) percent density bonus above the City's maximum allowable density. In addition, the City entered into a Disposition and Developer Agreement with the developer to issue loans not to exceed \$600,000. The loans are secured by loan agreements, promissory notes and deeds of trust, along with Regulatory Agreement and Declaration of Restrictive Covenants to be recorded against the property for a period of not less than 55 years. The project is 100 percent affordable to very low and low income seniors.

The remaining capacity in Old Town Tustin will be achieved through recycling of underutilized and vacant infill sites (see Figure 1). According to the City’s Land Use Element, the sites in Old Town Tustin area are able to accommodate an overall population range for residential use of 2-54 persons per acre<sup>10</sup>. The Land Use Element further identifies the potential development of dwelling units in the Old Town Commercial area, which will be facilitated by the proposed adoption of zoning regulations and development standards which will allow mixed-use development (see Program 1.21 of Table H-20 Housing Element Programs). This development potential is supported by the market analysis of the Old Town area.

To further create housing opportunities, the City provides the issuance of tax-exempt bonds for the development of affordable housing through a Joint Powers Authority with the California Statewide Communities Development Authority. Other means would include the City’s participation in the State and Federal programs such as the Low- Income Housing Revenue Bond Financing program, Low Income Tax Credits, CHFA financing programs, and others.

Additionally, a Density Bonus Ordinance is available and can be applied to infill sites to increase allowable density and the Tustin City Code also provides for a Planned Community District which allows flexibility in site development standards such as the creation of smaller lots to allow for higher density.

As demonstrated in Table H-13A, there are a total of 205.3 acres of land (177.1 acres from MCAS Tustin, 15.35 acres vacant land, and 12.85 acres underutilized land) with residential development potential. These sites could potentially be developed with approximately 2,882 units. This demonstrates that the City has sufficient amount of land available to accommodate the residential developments to meet the remaining RHNA construction needs through the 2021 period.

**TABLE H- 13**  
**SUMMARY OF QUANTIFIED RHNA OBJECTIVES**  
**CITY OF TUSTIN**  
**2014-2021**

Income Group	RHNA	Units Approved	Net RHNA Construction Need
Very Low	141	88	53
Extremely-Low	142 <sup>1</sup>		142
Low	195	73	122
Moderate	224	101	123
Above Moderate	525	496	29
<b>Total</b>	<b>1,227</b>	<b>758</b>	<b>469</b>

<sup>1</sup> Pursuant to Government Code Section 65583(a)(1), City’s share of extremely-low income units is 142 (50 percent of the total Very Low Income new construction objective).

Source: 2012 RHNA, SCAG, 2005-2009 ACS

<sup>10</sup> See Table LU-3 – “Future Land Use Density/Intensity and Population Capacity of the Land Use Plan” in the City of Tustin General Plan Land Use Element, January 16, 2001.

**TABLE H- 13A  
VACANT AND UNDERUTILIZED LAND WITH RESIDENTIAL DEVELOPMENT POTENTIAL**

Land Use Category <sup>1</sup>	Vacant Land										Underutilized Land									
	Very-Low		Low		Moderate		Above-Moderate		Total		Very-Low		Low		Moderate		Above-Moderate		Total	
	AC	DU	AC	DU	AC	DU	AC	DU	AC	DU	AC	DU	AC	DU	AC	DU	AC	DU	AC	DU
<b>CONVENTIONAL ZONING DESIGNATIONS</b>																				
Low Density Res. (1-7 du/ac)																				
Medium Density Res. (8-15 du/ac)						21			2.67	21										
High Density Res. (15-25 du/ac)		57		39		45		106	12.68	247		74		51		58		136	12.85	319
Mobile Home Park (1-10 du/ac)																				
<i>Subtotal</i>		57		39		66		106	15.35	268		74		51		58		136	12.85	319
<b>MCAS TUSTIN SPECIFIC PLAN<sup>2</sup></b>																				
Neighborhood D		195		122		160		571	29.5	1,048										
Neighborhood G		88		73		64		1,022	147.6	1,247										
<i>Subtotal</i>		283		1954		2243		1,620	177.1	2,295										
<b>PLANNED COMMUNITY DESIGNATIONS</b>																				
PC Low Density Res.																				
PC Med. Density Res.																				
PC High Density Res.																				
<i>Subtotal</i>																				
<b>TOTAL</b>		340		234		290		1,726	192.45	2,563		74		51		58		136	12.85	319

<sup>1</sup> Correlation of land use densities and income levels based upon the City's General Plan maximum density

<sup>2</sup> Income level estimated based upon specific plan densities and Disposition and Development Agreement entered with Developer and the City.

<sup>3</sup> Neighborhood D includes 157 approved density bonus units (157+891=1,048).

<sup>4</sup> Neighborhood G includes 33 approved density bonus units (33+1214=1,247).

Residential Development Potential includes approved density bonus units, but not potential density bonus units.

Source: City of Tustin; MCAS Tustin Specific Plan, as amended, Vacant and Underutilized Land Suitable for Residential Development, and City of Tustin General Plan, January 16, 2001.

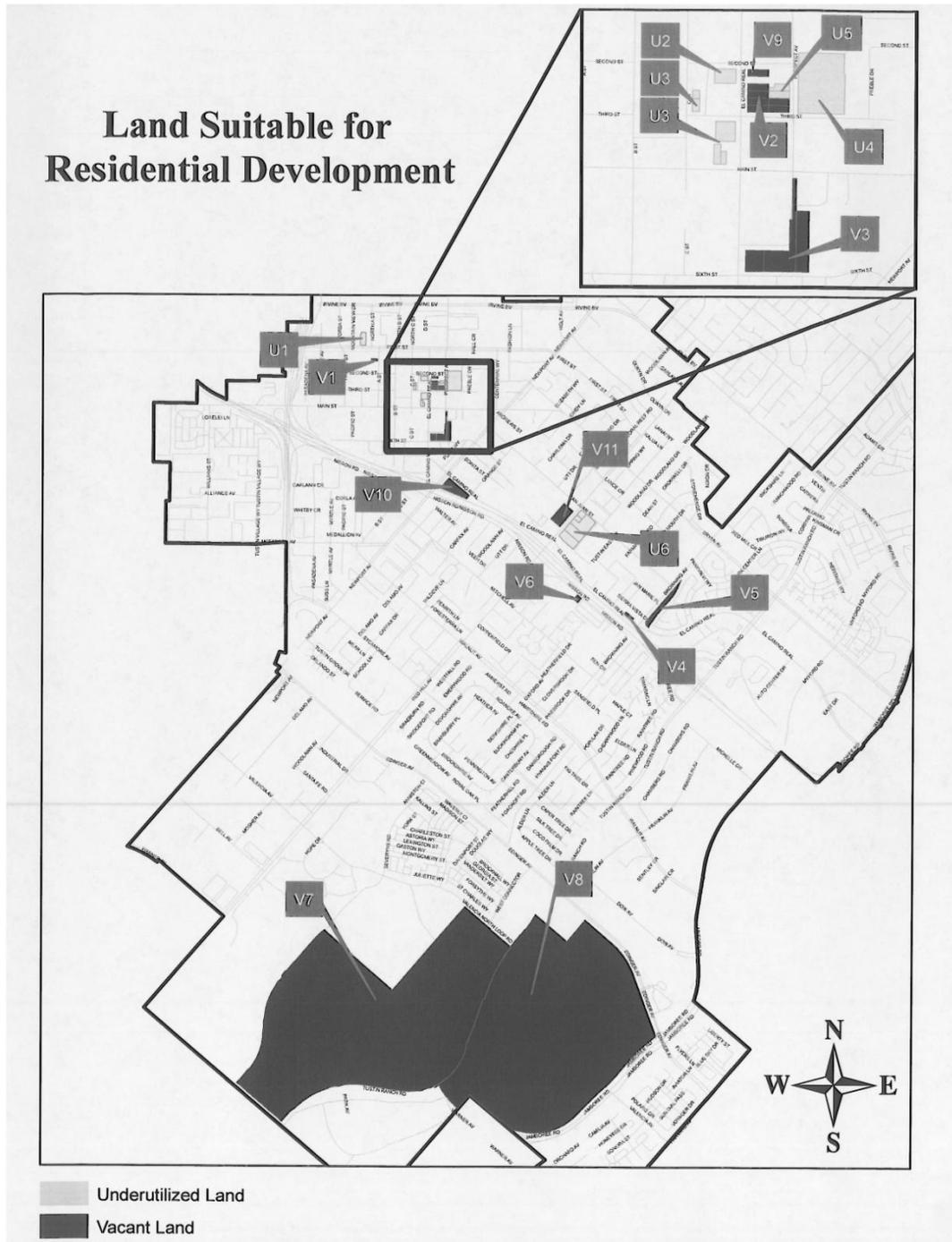
Figure 1 and Tables H-14 and 15 detail the zoning designations of vacant and underutilized land in Tustin. The vacant and underutilized land inventory includes land that is currently zoned medium- and high-density residential and land that could potentially be designated as high-density residential. Realistic capacity of sites that are identified in Tables H-14 and 15 are derived from past development proposals, historical character of the area, inquiries received by the Community Development Department, Disposition and Development Agreements between the City and developers, exclusive negotiations with potential developer(s) authorized by the City Council, maximum zoning and general plan densities, and eligible incentives to developers for provisions of affordable housing. Realistic capacity for sites identified to meet the City's share of regional housing needs either are determined based upon current zoning and general plan, executed Disposition and Development Agreement, and the City Council authorized exclusive negotiations with potential developers.

The closure of MCAS Tustin provides the City with opportunity sites to meet the City's share of regional housing needs. The majority of the City's share of housing needs will be provided at the former MCAS Tustin (Tustin Legacy) project site which was part of the base closure realignment process. The Federal government provided the land to the City at no cost. The City has been conveying the land to developers for the development of the Tustin Legacy.

Although the availability of vacant and underutilized land for the provision of housing is not considered a constraint for the 2013-2021 planning period, future planning periods may be marked by a lack of available land. While the City's Land Use Plan provides an adequate land capacity to fulfill housing needs, current development costs in Tustin may preclude the private housing market from providing affordability for low and very low-income households without subsidies. Necessary infrastructure improvements and litigation constraints may cause some delays in the build-out development of the MCAS Tustin project.

Satisfaction of the City's quantified objectives through new construction will be heavily dependent upon real estate market trends, cooperation of private funding sources, and available funding and programs at the local, county, state and federal levels.

Figure 1 - Vacant & Underutilized Land in the City of Tustin\*



**TABLE H- 14  
VACANT LAND SUITABLE FOR RESIDENTIAL DEVELOPMENTS**

	<b>Address</b>	<b>Assessor Parcel Number</b>	<b>Existing Use/Description</b>	<b>Zoning Designation</b>	<b>General Plan Land Use Designation</b>	<b>Lot Size (acres)</b>	<b>Capacity Estimate*</b>
1	140 S. A Street	401-361-03	vacant	R3	High Density Residential	0.17	
2	225 El Camino Real	401-584-04 to 401-584-09	Farmer's Market site	C2 P	Old Town Commercial	1.02	
3	El Camino Real	401-623-14 to 401-623-16	adjacent to Armstrong	C2 P	Old Town Commercial	2.61	
4	1951 El Camino Real	500-071-12	City of Tustin	R4	High Density Residential	0.38	
5	Browning/El Camino Real	500-201-02	Tustin Ranch Reserve Area	PC-R	PC Residential (Medium Low)	2.67	
6	1776 Nissan	432-401-12	adjacent to Blueboy Swimschool	R3 1500	High Density Residential	0.39	
7	Neighborhood D <sup>(1)</sup>	Planning Areas <sup>(2)</sup> 8/13/14	Former MCAS Tustin	MCAS Tustin Specific Plan	MCAS Tustin Specific Plan	29.5	1,048
8	Neighborhood G	Planning Area <sup>(2)</sup> 15	Former MCAS Tustin	MCAS Tustin Specific Plan	MCAS Tustin Specific Plan	147.6	
9	205 El Camino Real	401-584-11	lot north of Dr. Helm	C2 P	Old Town Commercial	0.17	
10	14052 Newport Avenue	432-074-05	vacant	C1 and C2	PC Commercial/Business	2.4	
11	13841 Red Hill Avenue	500-141-10	vacant	C2	PC Commercial/Business	2.87	

**Notes:**

\*For planning purposes only - Actual capacity will be determined upon review and approval of actual development application

du: Dwelling Unit. Capacity estimate only provided for site(s) necessary to satisfy RHNA, which sites are located in Neighborhood D of the MCAS Tustin Specific Plan

(1) A default density of 30 units per acre may be achieved in Neighborhood D.

(2) No specific parcel number available since the planning areas have not been subdivided.

No site has known environmental constraints

Source: City of Tustin Community Development Department.

**TABLE H-15  
UNDERUTILIZED LAND SUITABLE FOR RESIDENTIAL DEVELOPMENTS**

	Address	Assessor Parcel Number	Existing Use	Zoning Designation	General Plan Land Use Designation	Lot Size (acres)
1	433-435 W. First Street	401-522-27	Trailer Park	FSSP	PC Commercial/Business	0.83
2	220 El Camino Real	401-572-01	Ability Plus School	C2 P	Old Town Commercial	0.34
3	245 "C" Street	401-572-04	Sheet Metal Shop	C2 P	Old Town Commercial	0.07
	155 Third Street	401-572-05	Russian Ballet	C2 P	Old Town Commercial	0.1
	300 El Camino Real	401-573-01	Former Bank Building	C2 P	Old Town Commercial	0.45
	115-125 W. Main Street	401-573-05 &06	Former Auto Parts Store	C2 P	Old Town Commercial	0.24
4	185-255 Prospect Avenue	401-581-09	Trailer Park	MHP	Mobile Home Park	2.9
5	230 Prospect Avenue	401-584-02	Single Family Home	C2 P	Old Town Commercial	0.15
	240 Prospect Avenue	401-584-03	Single Family Home	C2 P	Old Town Commercial	0.17
6	13742-13852 Red Hill Ave.	500-022-04,07,11,12	Retail shopping center	C1	Community Commercial	7.6

**Notes:**

**\*For planning purposes only - Actual capacity will be determined upon review and approval of actual development application**

**du: Dwelling Unit**

**PA: Planning Area**

**(1) Potential Mixed Use**

**No site has known environmental constraints**

**Source: City of Tustin Community Development Department.**

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## HOUSING ELEMENT GOALS AND POLICIES

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This section of the Housing Element contains the goals and policies the City intends to implement to address a number of housing-related issues. To implement the Housing Element, the following six major issue areas are identified with related goals and policies: 1) ensure that a broad range of housing types are provided to meet the needs of existing and future residents; 2) provide equal housing opportunities for all City residents; 3) ensure a reasonable balance between rental and owner occupied housing; 4) preserve existing affordable housing; 5) promote conservation and rehabilitation of housing and neighborhood identity; and 6) ensure housing is sensitive to the existing natural and built environment.

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### HOUSING SUPPLY/HOUSING OPPORTUNITIES

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Tustin is 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. 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 affordable housing in the region requires the City to attempt to preserve Low-income housing units that are at risk of converting to other uses. The City establishes the following goals and policies to achieve the above objectives.

**GOAL 1: Provide 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.**

**Policy 1.1:** Promote the construction of additional dwelling units to accommodate Tustin's share of regional housing needs identified by the Southern California Association of Governments (SCAG), in accordance with adopted land use policies.

**Policy 1.2:** Pursue smart growth principles by supporting 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 transit, services, shopping, schools, senior centers and recreational facilities, where possible.

**Policy 1.3:** Consider site scoring, income targeting, and other selection criteria for competitive funding sources for affordable housing, such as Low Income Housing Tax Credits, when allocating Agency resources for affordable housing to maximize leverage of local funds.

**Policy 1.3:** Continue to implement best practices for developer selection, project underwriting and due diligence 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.

**Policy 1.4:** Preserve affordable housing units, where possible, through actions such as the maintenance of a mobile home park zone, restrictions on R-3 zone uses to preserve the multiple family residential characters, facilitate resident access to funding sources for preservation of low income and assisted housing.

**Policy 1.5:** Promote the dispersion and integration of housing for low- and very-low income families throughout the community as opposed to within any particular geographic area, neighborhood, or project.

**Policy 1.6:** Encourage the County of Orange to exercise its responsibilities for housing accommodations for low- and very-low income families within Tustin's sphere of influence.

**Policy 1.7:** Utilize various resources, where feasible, to assist in creating opportunities which will expand opportunities for development of affordable housing in the community.

**Policy 1.8:** Allow second (attached/detached) units in single- and multi-family districts consistent with the Tustin City Code.

**Policy 1.9:** Utilize Planned Community Districts and Specific Plans to authorize and promote a variety of lot sizes and housing types.

**Policy 1.10:** Promote cluster housing consistent with General Plan land use density standards to reduce the cost of housing construction.

**Policy 1.11:** Encourage the availability of affordable housing for special needs households, including large, low-income families. Special needs households include the elderly, large families, female-headed households with children, households with a disabled person, and the homeless (see discussion under Summary of Housing Needs for Special Needs Groups).

**Policy 1.12:** Encourage incentives to assist in the preservation and development of affordable housing such as 1) reducing permit processing time and waiving or reducing applicable permit fees; 2) on-site density bonuses when appropriate; 3) tax-exempt financing including continuing to make use of the City's membership in the California Statewide Communities Development Authority to provide opportunities for developer assistance in pre-development and development financing of affordable housing programs; 4) flexibility in zoning or development standards; and 5) other financial incentives using a variety of special State and Federal grant and housing programs.

**Policy 1.13:** Encourage the design and occupancy of housing for senior citizens and the disabled. Promote the construction or rehabilitation and adoption of dwelling units accessible to seniors and/or the disabled.

**Policy 1.14:** Provide continued support for the County Homeless Assistance Program and other homeless assistance programs within Tustin and in adjacent cities, including the continued use of the City's membership in California Statewide Communities Development Authority to issue private activity mortgage bonds in support of these programs

**Policy 1.15:** Encourage the provision of grants and technical assistance to various organizations and agencies that provide assistance to persons with special needs such as the homeless, disabled, low-income, and elderly persons.

**Policy 1.16:** Participate in federal and state housing assistance and rehabilitation programs aimed at assisting households in need.

**Policy 1.17:** Utilize design criteria in evaluating projects to ensure compatibility with surrounding developments, while taking into consideration ways to minimize housing costs.

**Policy 1.18:** Promote and encourage non-profit and for-profit private sector interests to use available federal and state programs for new or rehabilitated affordable housing.

**Policy 1.19:** Support state-enabling legislation for employers to contribute to the cost of housing for their employees.

**GOAL 2: Ensure equal housing opportunities for all existing and future City residents regardless of race, religion, ethnicity, sex, age, marital status or household composition.**

**Policy 2.1:** Promote equal opportunity housing programs within the community.

**Policy 2.2:** Provide active support to provide fair housing opportunities.

**Policy 2.3:** Support programs to match elderly and low and moderate-income individuals who want to share housing costs in a joint living arrangement.

**Policy 2.4:** Support public and private efforts to eliminate all forms of discrimination in housing.

**Policy 2.5:** Minimize displacement of lower income and special needs households, whenever possible, to ensure that displacement is carried out in an equitable manner.

**GOAL 3: Increase the percentage of ownership housing to ensure a reasonable balance of rental and owner-occupied housing within the City.**

**Policy 3.1:** Encourage new housing construction for home-ownership in a mixture of price ranges.

**Policy 3.2:** Examine any existing City home purchasing assistance programs for low- and moderate-income households, including down-payment assistance, - and mortgage revenue bond financing, and recommend program modifications to make them more effective in the current housing market.

**Policy 3.3:** Encourage rental unit conversion and alternative forms of homeownership, such as shared equity ownership and limited equity cooperatives where feasible.

**Policy 3.4:** Examine existing condominium conversion standards to promote renovation of existing units through rental conversion.

**GOAL 4: Preserve the existing supply of affordable housing in the City.**

**Policy 4.1:** Continue to use Federal and State housing initiatives available for low-income households.

**Policy 4.2:** Monitor all federal, state and local funds available to preserve and/or replace lower income units at risk of converting to market rate housing, including tax credit bond financing.

**Policy 4.3:** Assist non-profit organizations in securing the resources necessary to preserve/replace lower to moderate income units at risk of converting to market rate housing.

**Policy 4.4:** Consider incentives to non-profit housing and for-profit private sector interests to purchase and/or maintain lower income units at risk of converting to non-lower income housing.

**Policy 4.5:** Take advantage of favorable market conditions, as appropriate, to pursue early negotiation and preservation of at-risk affordable housing through extension of existing affordability restrictions.

## **MAINTENANCE AND CONSERVATION**

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Maintenance and preservation of a City's housing stock prevents unhealthy living conditions; eliminates the need for future, more costly housing rehabilitation; prevents neighborhood deterioration; and encourages community pride. The City enforces codes and provides incentives to promote maintenance and conservation.

**GOAL 5: Conserve, maintain, rehabilitate, and/or replace existing housing in neighborhoods which are safe, healthful and attractive, in accordance with adopted Land Use Policy. Improve the residential character of the City with an emphasis on revitalizing neighborhoods showing signs of deterioration. Promote conservation of the City's sound housing stock, rehabilitation of deteriorated**

**units where they may exist Citywide, and elimination of dilapidated units that endanger the health, safety and wellbeing of occupants.**

**Policy 5.1:** Through available financial incentives, encourage owners of rental housing units that are determined to be substandard, in need of repair and a hazard to the health and safety of the occupants to remove and replace or rehabilitate the structures.

**Policy 5.2:** Promote the availability of funds for the rehabilitation of single-family dwellings and apartments.

**Policy 5.3:** Periodically evaluate housing conditions and, when appropriate, address any increase in deteriorated housing conditions.

**Policy 5.4:** Continue to enforce health, safety, and zoning codes to eliminate conditions which are detrimental to the health, safety and welfare of residents.

**Policy 5.5:** Promote preservation of historic and architecturally significant residential properties.

**Policy 5.6:** Study and revise existing zoning codes, if warranted, to provide flexibility to facilitate additions and improvements to existing historic and architecturally significant residential properties.

**Policy 5.7:** Review existing guidelines for single- and multi-family rehabilitation programs, including income targeting and neighborhood location, to achieve maximum neighborhood revitalization.

## **ENVIRONMENTAL SENSITIVITY**

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Housing design and land use patterns can have substantial impacts on the natural as well as the built environment. City policies and programs seek to minimize negative environmental impacts.

**GOAL 6: Ensure that new housing is sensitive to the existing natural and built environment.**

**Policy 6.1:** Attempt to locate new housing facilities in proximity to services and employment centers thereby enabling walking or bicycling to places of employment.

**Policy 6.2:** Promote energy conservation measures in the design of new housing units and the redevelopment of older housing units.

**Policy 6.3:** Require design review of lot placement in subdivisions to maximize passive solar energy and solar access.

**Policy 6.4:** Promote water efficient landscapes, efficient irrigation, and use of permeable paving materials.

**Policy 6.5:** Streamline processing for approved green building.

**Policy 6.6:** Consider, support, or partner with utility companies to promote energy rebate programs.

**Policy 6.7:** Require buildings and structures to not penetrate Federal Aviation Regulation (FAR) Part 77 Imaginary Obstruction Surfaces for John Wayne Airport unless found consistent by the Airport Land Use Commission (ALUC). Additionally, in accordance with FAR Part 77, require applicants proposing buildings or structures that penetrate the 100:1 Notification Surface to file a Form 7460-1 Notice of Proposed Construction or Alteration with FAA. A copy of the FAA application shall be submitted to ALUC and, the applicant shall provide the City with FAA and ALUC responses.

**Policy 6.8:** Require development projects that include structures higher than 200 feet above existing grade to be submitted to ALUC for review. In addition, require projects that exceed a height of 200 feet above existing grade to file Form 7460-1 with the Federal Aviation Administration (FAA).

## **RELATED GOALS AND POLICIES**

The goals and policies described in the Housing Element are related to and support the goals and policies included within other General Plan elements. Many goals and policies from the other elements directly or indirectly support the goals and policies of the Housing Element. These supporting goals and policies are identified in Table H-16.

**TABLE H- 16  
HOUSING RELATED GOALS AND POLICIES BY ELEMENT**

Housing Issue Area	RELATED GOALS AND POLICIES BY ELEMENT						
	Land Use	Housing	Circulation	Conservation/ Open Space	Public Safety	Noise	Growth Management
Housing Opportunities	1.8, 10.2, 13.3, 13.4, 13.10		1.1, 1.10				2.5, 3.1, 4.1
Maintenance and Preservation	1.1, 4.6, 5.8, 6.4, 6.6				3.4, 3.5, 5.4	1.7, 2.2	
Affordable Housing Support Service/ Fair Housing			5.3				4.1
Environmental Sensitivity	3.6, 9.6, 9.7, 9.8, 13.1		1.14, 1.17, 3.5	2.12, 3.1, 4.1	3.3, 4.8, 4.12	1.11, 1.12	

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## **HOUSING ELEMENT IMPLEMENTATION PROGRAM**

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The Housing Element Implementation Program provides specific actions the City intends to undertake to achieve the goals and policies of the Element. This section identifies quantified objectives, available financial resources and affordable housing resources, and provides a list of specific programs the City intends to pursue. Housing programs include those currently in operation and new programs added to address housing needs. A description of each program is provided, along with the program funding source, responsible agency, and time frame for implementation. A review of City's past performance on housing element implementation programs is contained in Appendix A of the Housing Element.

### **RHNA QUANTIFIED OBJECTIVES 2014-2021**

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State law requires the City to accommodate its fair share of the State's housing need. In doing so, the City must quantify the number of homes that are projected to be built and conserved. The following quantified objectives are adopted as guidelines toward meeting Tustin's housing needs through 2021.

It is important to note that while the quantified objectives of the RHNA are required to be part of the Housing Element and the City will strive to attain these objectives, Tustin cannot guarantee that these needs will be met given its own limited financial resources and the present affordability gap. Satisfaction of the City's regional housing needs will partially depend upon cooperation of private funding sources and the funding levels of County, State, and Federal programs that are used to support the needs of the very-low, low and moderate-income persons. Additionally, outside economic forces heavily influence the housing market.

#### **New Construction Objectives**

The City of Tustin promotes and encourages the development of a variety of housing opportunities to accommodate current and projected housing needs which include 283 very low-, 195 low-, 224 moderate-, and 525 above moderate-income households per the 2012 Regional Housing Needs Assessment (RHNA) allocation. While the Land Use Plan provides adequate sites to fulfill needs established by RHNA, construction of new units will depend upon the timing of the landowner and developer in the submission of building plans to meet market demands. Housing subsidies will depend upon the availability of government funds - local, County, State, and Federal. Development projects are subject to the interests of private developers. The construction of secondary units depends upon the desires of the property owners as related to family needs for housing and economic

resources. The achievements of the housing objectives are thus dependent upon the private sector and other governmental agencies. The responsibility of the City is to encourage the construction of affordable housing by providing programs and assistance to developers and to assist in its creation by facilitating the review and approval of development permits.

Table H-17 provides new construction housing objectives for the period 2014-2021. With the exception of Tustin Legacy, all sites identified in Table H-17 are privately owned. Units identified are broken down into various income limits in light of RHNA percentages.

Table H-13 discusses the City's progress toward achieving the RHNA quantified objective. Based on units approved or under construction, the City of Tustin has the following remaining units to achieve RHNA's construction objective: 195 Very Low Income, 122 Low Income, 123 Moderate Income and 29 Above Moderate Income units. The City will make its best efforts to accommodate this objective by carrying out the following projects and/or programs:

#### **Preservation**

Pursuant to Government Code Section 65583.1(c), up to 25 percent of the lower income RHNA may be fulfilled with existing units when affordability is achieved through:

- Affordability covenants placed on previously non-affordable units;
- Extension of affordability covenants on affordable housing projects identified as at risk of converting to market-rate housing; and
- Acquisition/rehabilitation and deed restriction of housing units.

With RHNA allocated 478 lower income units, the City may fulfill 120 lower income units (71 Very Low and 49 Low) through preservation of existing housing units. As identified in the Preservation of Units At-risk for Conversion section of the Housing Element, there are a total of 100 units at risk for conversion during the planning period at Tustin Gardens. .

The City, in anticipation of this opportunity, had programmed \$2,181,672 of RDA housing set aside funds in the Agency's Comprehensive Affordable Housing Strategy's Six- Year Capital Plan to negotiate the preservation of these units. The City Council in their capacity as the Redevelopment Agency (eliminated 2011) adopted the Comprehensive Affordable Housing Strategy (CAHS) in June 2008 committing up to \$2,181,672 of Agency Housing Set-Aside funds for the preservation efforts of these at-risk units. However, the dissolution of Redevelopment in 2011 effectively eliminated the primary source of funding that could be used to preserve these units at risk of conversion.

As presented in Table HTM-34 of the Housing Element Technical Memorandum, the City has fulfilled a portion of its regional share for very low and low income households (362 and 127 units respectively) during the prior planning period, rendering the City eligible to utilize the alternative site program, if desired. The City is in contact with Tustin Gardens regularly and has expressed interest in ensuring the continuation of these affordable units. The City is also in contact with residents to allow for active public participation with current residents to ensure continued affordability.

Tustin Gardens maintains a Section 8 contract for rental assistance. They are currently approved through July 13, 2014 with a HUD-requirement that they provide a one-year notice to terminate their current Section 8 contract. The earliest date affordability restrictions can expire is July 2015. The city will make every effort to assist the owner obtain an extension of the HUD Section 8 contract. . Considering the earliest possible scenario of affordability restrictions expiring July 2015, the total cost of subsidizing Tustin Gardens for the term of the Housing Element, July 2014 to October 2021, would be about \$4,205,400.

The City believes Tustin Gardens is a viable project to receive 4% Tax Credit, Tax-Exempt Bond funding. Tustin Gardens is a 100% affordable, very-low income Senior Project. The City would work with the current owner to establish a non-profit affordable housing entity to apply for 4% Tax Credit, Tax-Exempt Bond funding for the acquisition and rehabilitation of Tustin Gardens.

### **New Construction:**

#### *Tustin Legacy Former Master Developer Footprint (Neighborhoods D and G)*

As mentioned throughout the Housing Element, the closure of the MCAS Tustin provides the City with opportunity to create affordable units to accommodate the needs of the residents. The City in 2001 adopted the MCAS Tustin Specific Plan and in 2003 designated the MCAS Tustin as a Redevelopment Project area and adopted the MCAS Tustin Redevelopment Plan (eliminated 2011). As part of the adopted Specific Plan, a total of 4,210 housing units were authorized and to date 2,105 units have been constructed. The 2,105 units yet to be built are under the Former Master Developer footprint. 758 units within Neighborhoods D and G have been approved. 190 of these 758 units are approved density bonus units. Therefore the remaining development potential is 1,537 units (2,105+190-758), plus any future density bonus units. In Neighborhood D, the maximum density on any individual parcel may exceed 25 dwelling units per acre as long as the total dwelling units allocated to Neighborhood D is not exceeded. Thus, a default density of 30 units per acre could be achieved in Neighborhood D. The remaining

development potential in Neighborhood D is 515 dwelling units plus potential density bonus units.

The development of Tustin Legacy is anticipated to occur during the Housing Element planning period.

*New Ownership and Rental Housing, outside of Tustin Legacy*

A total development potential of 587 dwelling units outside of Tustin Legacy has been identified during the Housing Element planning period on vacant and underutilized sites. However, these sites are not required to satisfy the City’s RHNA.

*Other New Construction Units*

It is likely that other development will occur through Second Units, and the recycling of single family uses on multi-family zoned lots. Based upon recent development proposals, the City has observed increased interest in the development of, second units and the addition of units within multiple family dwelling properties occupied by single family dwellings. The cost to construct these units would be borne by the property owner. However, the City would facilitate the development process.

In addition, based upon past development trends (Tustin Grove and Ambrose Lane) that utilized Planned Community Districts to allow for higher densities, the actual number of units created could be higher than identified. The City will strive to ensure that newly constructed units are developed at sufficient densities to assist in fulfillment of low and very low income needs by employing inclusionary zoning for those sites located within former Redevelopment project areas, mixed use zoning in Old Town Tustin, density bonuses particularly in infill sites to allow for increase densities to accommodate affordable housing developments, and Planned Community Districts to allow for flexibility in development standards.

**TABLE H- 17  
QUANTIFIED OBJECTIVES SUMMARY  
CITY OF TUSTIN  
2014-2021**

Program	Total # of Units	Extremely Low and Very Low <sup>4</sup> (<50%)	Low (<80%)	Moderate (80-120%)	Upper (120%+)
<b>Tustin Legacy Housing Units<sup>1</sup></b>					
Neighborhood D	1,048	195	122	160	571
Neighborhood G	1,247	88	73	64	1,022

**TABLE H- 17**  
**QUANTIFIED OBJECTIVES SUMMARY**  
**CITY OF TUSTIN**  
**2014-2021**

Program	Total # of Units	Extremely Low and Very Low <sup>4</sup> (<50%)	Low (<80%)	Moderate (80-120%)	Upper (120%+)
Preservation	100	100			
New Ownership and Rental Housing	587	131	90	124	242
Second Unit	10		10		
Recycling of SF uses to MFD in R-3 district	8		8		
<b>Total Quantified Objectives</b>	<b>3,000</b>	<b>514</b>	<b>303</b>	<b>348</b>	<b>1,835</b>
<b>RHNA</b>	<b>1,227</b>	<b>283</b>	<b>195</b>	<b>224</b>	<b>525</b>
<b>Difference</b>	<b>1,773</b>	<b>231</b>	<b>108</b>	<b>124</b>	<b>1,310</b>

<sup>1</sup> MCAS Tustin Specific Plan authorizes a total 4,210 potential units (plus density bonus units) at Tustin Legacy. Based upon the Specific Plan requirement, at least 15 percent of the total units (632 units) would be affordable to Very-Low, Low, and Moderate income households, of which at least 6 percent or 253 units would be affordable to Very Low income households. A total of 296 affordable inclusionary units were included in the authorized total number of units to be developed at Tustin Legacy. Of the 4,210 units, 2,105 units have been completed. A total of 2,105 units (plus density bonus units) are planned within Neighborhoods D and G. Within Neighborhoods D and G, 758 units have been approved and/or are under construction, including 88 Very Low, 73 Low, 101 Moderate, and 496 Above Moderate units, including 190 density bonus units.

<sup>2</sup> .

<sup>3</sup> <sup>4</sup> Pursuant to Government Code Section 65583(a) (1), City's share of extremely-low income units is 142 (50 percent of the RHNA Very Low income households' new construction objective). Total number of units for extremely-low income and low income units equals to City's share of very-low income units of 283 units

Source: 2012 RHNA; City of Tustin; MCAS Tustin Specific Plan.

### **Preservation, Rehabilitation, and Other Affordable Housing Program Objectives**

The primary beneficiaries of Preservation and Rehabilitation and Assistance programs are renters and low-income homeowners. It is assumed that above-moderate-income households will rehabilitate units as needed through private efforts.

Tustin's affordable housing strategy is based on the City's housing needs, affordability gap analysis, and available financial resources. Several broad policies establish the framework for the City's Housing strategy as applied to preservation, rehabilitation, and other housing program objectives. These include:

1. Conserve, maintain, and rehabilitate existing housing and revitalize existing neighborhoods;
2. Maximize the supply of affordable housing;

3. Increase homeownership;
4. Preserve the existing supply of affordable housing; and,

Consistent with the above policies the City has devised a number of programs of housing assistance to address the preservation, rehabilitation, and other housing program objectives. Specific details on these programs can be found in the City of Tustin Comprehensive Housing Affordability Strategy for Fiscal Years 2008/09 to 2017/18. In addition, Table H-20 – Housing Element Programs 2013-2021 outlines the City’s specific housing programs during the planning period.

**Summary of Quantified Objectives**

Table H-18 summarizes the City’s Quantified Objectives for the 2013-2021 period. Based on the requirements of AB 2634, statute of 2006 (Government Code Section 65583(a)(1)), each jurisdiction must address the projected need of Extremely Low-Income households, defined as households earning less than 30 percent of the Area Median Income (AMI). The projected Extremely-Low Income need is assumed to be 50 percent of the Low Income need, or 142 units based upon the percentage of extremely-low income households contained in the regional housing needs assessment determined by SCAG using American Community Survey data as the baseline.

**TABLE H-18  
SUMMARY OF QUANTIFIED OBJECTIVES  
CITY OF TUSTIN 2014-2021**

Income Group	RHNA	New Construction	Preservation
Very Low	141	272	100
Extremely-Low	142 <sup>1</sup>	142	
Low	195	303	
Moderate	224	348	
Above Moderate	525	1,835	
<b>Total</b>	<b>1,227</b>	<b>2,900</b>	<b>100</b>

<sup>1</sup> Pursuant to Government Code Section 65583(a) (1), City’s share of extremely-low income units is 142 (50 percent of the total Very Low Income new construction objective).

Source: 2012 RHNA, SCAG, 2005-2009 ACS

**IDENTIFICATION OF AFFORDABLE HOUSING RESOURCES**

The City has prepared a Consolidated Plan and Comprehensive Housing Affordability Strategy identifying and describing all funding programs available to the City and Tustin Redevelopment Agency (eliminated 2011) to assist in meeting the City's housing needs. Included in the plan are descriptions of a wide variety of major housing assistance programs available from federal and state agencies and private lending institutions. More specific information including details regarding

eligible projects and activities and funding availability can be found in the document. The following is a summary of this information along with updates to reflect new state and federal programs.

The key source of local funding for affordable housing development and preservation in Tustin was the Tustin Community Redevelopment Agency's (eliminated 2011) Low and Moderate Income Housing Fund, also known as the 20 Percent Set-Aside Fund. The estimated fund balance in the Agency's Low and Moderate Income Housing Fund as of June 30, 2007 was \$17.86 million. With the dissolution of redevelopment in 2011, these funds are no longer available.

- **Preservation of At-Risk Affordable Housing Rental Units**

The City of Tustin has identified the preservation of existing affordable housing units as one of the most cost-effective methods of maintaining the stock of affordable housing therefore a high-priority program for the City.

The City has identified 100 units of at-risk housing with expiring use restrictions within the eight-year planning period. The amount of assistance provided will be negotiated based on the specific economics of each development and the potential availability of leverage financing, such as tax-exempt bonds and 4% tax credits. .

- **Single- and Multi-Family Home Rehabilitation Program**

The City has identified single- and multifamily home rehabilitation loans and grants as another cost-effective method of extending the life of affordable housing in the community. Based on available funding, the City will target single-family neighborhoods in the vicinity of the Town Center opportunity area as part of the Town Center revitalization effort, as well as multifamily units citywide.

- **First-Time Homebuyer and/or Foreclosure Negotiated Purchase**

The City's First-Time Homebuyer Program provided down payment and second mortgage assistance to low and moderate income buyers to assist them to purchase an existing home in the City. The recent mortgage credit crises have resulted in increasing foreclosure rates throughout many parts of California and the nation. The City will seek funding to assist new first-time homebuyers in purchasing a home. This may include negotiated purchase of homes in foreclosure, which may represent a lower cost buying opportunity for first-time homebuyers.

- **Homeless Assistance and Supportive Services**

The City has allocated \$88,090 in 2013/14 CDBG funds to continue its financial support of homeless assistance and supportive services in the City. The City's goal for this program is to assist 200 homeless individuals per year over the projection period.

- **Tustin Legacy New Construction**

The City's inclusionary housing requirements for Tustin Legacy require a minimum of 453 new affordable units in Planning Areas D and G combined, including 126 units affordable to very low income households, 95 units affordable to low income households, and 232 units affordable to moderate income households.

- **Administrative Support**

The City and the Tustin Housing Authority will provide administrative support to implement its affordable housing activities.

The City has initiated the development of additional very low, low and moderate income housing in the MCAS Tustin Project Area through density bonus incentives.

The City is not an entitlement jurisdiction for HOME funds, but may apply to the State for HOME funds as described in a separate report prepared by DRA entitled *Affordable Housing Assistance Programs*, presented as Appendix C of the Comprehensive Affordable Housing Strategy.

The City is an entitlement jurisdiction for Community Development Block Grant (CDBG) funds. For FY 2012/13, the City of Tustin was allocated \$587,277 in CDBG funds. These funds may be used for a number of community development purposes besides housing. Given the many competing needs for these funds and the restrictions on these funds for housing purposes, the City does not typically allocate CDBG funds for affordable housing development.

As needed and as shown on Table H-21, the City will utilize State and Federal resources to leverage local resources as these funding sources match the City's programmatic objectives. Table H- 21 is a summary of affordable housing resources.

**TABLE H- 19  
AFFORDABLE HOUSING RESOURCES<sup>1</sup>  
CITY OF TUSTIN**

<b>LOCAL RESOURCES</b>		
<b>Program</b>	<b>Description</b>	<b>Eligible Activities</b>
<b>Multi-Family Residential Rehab-Loan/Grant Program</b>	Assistance to owners of multi-family projects occupied by low- to moderate-income persons. This program has been discontinued pending available funding.	<ul style="list-style-type: none"> <li>• Rehabilitation</li> </ul>
<b>First Time Homebuyer Program</b>	Low Interest Rates and Down payment assistance. This program has been discontinued pending available funding.	<ul style="list-style-type: none"> <li>• First Time Homebuyer</li> </ul>
<b>Single-Family Residential Rehab-Loan/Grant Program</b>	Assistance to owners of single-family projects occupied by low-income persons. This program has been discontinued pending available funding.	<ul style="list-style-type: none"> <li>• Rehabilitation</li> </ul>
<b>New Construction</b>	Financial assistance for new affordable housing projects. This program has been discontinued pending available funding.	<ul style="list-style-type: none"> <li>• New Construction</li> </ul>
<b>Rental Housing Program</b>	Financial assistance for affordable multi-family rental projects. This program has been discontinued pending available funding.	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• New Construction</li> </ul>
<b>Density Bonus</b>	The City allows an increase in density to developers who set-aside certain number of units in accordance with the City’s Density Bonus Code to very low and low-income persons.	<ul style="list-style-type: none"> <li>• Density Bonus</li> </ul>
<b>Tax-Exempt Bonds</b>	The City has the authority to issue tax-exempt bonds. The City is also a member of California Statewide Communities Development Authority. Bond proceeds are used to develop affordable housing.	<ul style="list-style-type: none"> <li>• New Housing Development</li> <li>• Rental Acquisition/ Rehabilitation</li> </ul>
<b>City Owned Land</b>	If available and appropriate, City owned land may be made available	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Community Facilities</li> </ul>
<b>STATE RESOURCES</b>		

<b>CalHome</b>	Enable low and very-low income households to become or remain homeowners	<ul style="list-style-type: none"> <li>• Predevelopment, site development, and site acquisition for development projects.</li> <li>• Rehabilitation, and acquisition and rehabilitation, of site-built housing, and rehabilitation, repair and replacement of manufactured homes.</li> <li>• Down payment assistance, mortgage financing, homebuyer counseling, and technical assistance for self-help</li> </ul>
<b>California Self-Help Housing Technical Assistance Allocation Program (CalHome Self-Help)</b>	Fund programs that assist low and moderate income families to build their homes with their own labor	<ul style="list-style-type: none"> <li>• Training and supervision of low and moderate income self-help home-builders</li> </ul>
<b>Affordable Housing Innovation Program: Loan Fund</b>	Provide quick acquisition financing for the development or preservation of affordable housing	<ul style="list-style-type: none"> <li>• Property Acquisition</li> </ul>
<b>Affordable Housing Innovation Program: Practitioner Fund</b>	Provide acquisition financing to pre-qualified developers for the development or preservation of affordable housing	<ul style="list-style-type: none"> <li>• Property Acquisition</li> </ul>
<b>Affordable Housing Innovation Program: Innovation Homeownership Program</b>	Increase homeownership opportunities for Californians with lower incomes	<ul style="list-style-type: none"> <li>• To be determined by HCD</li> </ul>
<b>Affordable Housing Innovation Program: Local Housing Trust Fund</b>	Help finance local housing trust funds (LHTFs) dedicated to the creation or preservation of affordable housing	<ul style="list-style-type: none"> <li>• Loans for construction of rental housing projects with units restricted for at least 55 years to households earning less than 60 percent of are median income, and down payment assistance to qualified first-time homebuyers.</li> </ul>

<b>Affordable Housing Innovation Program: Construction Liability Insurance Reform Pilot Program</b>	Reduce insurance rates for condominium development by promoting best practices in construction quality control.	<ul style="list-style-type: none"> <li>• Construction oversight and monitoring activities, including video recording of construction work, quality control manuals, and quality control inspections.</li> </ul>
<b>Building Equity and Growth in Neighborhoods Program (BEGIN)</b>	Reduce local regulatory barriers to affordable ownership housing, and provide down payment assistance loans to qualifying first-time low- and moderate-income buyers of homes in BEGIN projects	<ul style="list-style-type: none"> <li>• Second mortgage loans for down payment assistance to low- or moderate-income first-time homebuyers. Eligible homes must be newly constructed in projects facilitated by local regulatory incentives or barrier reductions, and may include manufactured homes</li> </ul>
<b>Emergency Housing and Assistance Program Capital Development (EHAPCD)</b>	Fund capital development activities for emergency shelters, transitional housing, and safe havens that provide shelter and supportive services for homeless individuals and families.	<ul style="list-style-type: none"> <li>• Acquiring, constructing, converting, expanding and/or rehabilitating emergency shelter, transitional housing, and/or safe haven housing and administration of the award (limited to 5 percent).</li> </ul>
<b>Emergency Housing Assistance Program (EHAP)</b>	Provide facility operating grants for emergency shelters, transitional housing projects, and supportive services for homeless individuals and families	<ul style="list-style-type: none"> <li>• Providing direct client housing, including facility operations and administration, residential rental assistance (move-in deposits and eviction prevention), leasing or renting rooms for provision of temporary shelter, capital development activities of up to \$20,000 per site, and administration of the award (limited to 5 percent).</li> </ul>

<p><b>Enterprise Zone Programs (EZs)</b></p>	<p>Stimulate business investment and job creation for disadvantaged individuals in state-designated economically distressed areas of California</p>	<ul style="list-style-type: none"> <li>• Incentives support the establishing, expansion and retention of businesses within designated zones. Eligible business activities include capital investment, lending, hiring and job retention. Types of zones include enterprise zones (EZs), Targeted Employment Areas (TEAs), Targeted Tax Areas (TTAs), Manufacturing Enhancement Areas (MEAs), and Local Agency Military Base Recovery Areas (LAMBRAs).</li> </ul>
<p><b>Mobile home Park Resident Ownership Program (MPROP)</b></p>	<p>Loans to finance the preservation of affordable mobile home parks by conversion from private ownership to ownership or control by resident organizations, nonprofit housing sponsors, or local public agencies.</p>	<ul style="list-style-type: none"> <li>• Purchase (conversion) of a mobile home park by a resident organization, nonprofit entity or local public agency; rehabilitation or relocation of a purchased park</li> <li>• Purchase by a low income resident of a share or space in a converted park.</li> </ul>
<p><b>Multifamily Housing Program: General Component (MHP-General)</b></p>	<p>Provide low-interest loans to developers of affordable rental housing developments. Funds may be used for permanent multifamily rental and transitional housing projects involving new construction, rehabilitation, acquisition and rehabilitation, or conversion of nonresidential structures.</p> <p>Special allocations are made for units that are lawfully restricted to senior citizens. Priority points will be given to projects using sustainable building methods that are established in state regulations</p>	<ul style="list-style-type: none"> <li>• MHP funds will be provided as permanent financing only. Eligible costs include project development capital costs, including child care, afterschool care and social service facilities integrally linked to the restricted housing units. Capital costs may involve real property acquisition; refinancing to retain affordable rents; necessary onsite and offsite improvements; reasonable fees and consulting costs; and capitalized reserves</li> </ul>

<p><b>Multifamily Housing Program: Supportive Housing Component (MHP-SH)</b></p>	<p>Provide low-interest loans to developers of permanent affordable rental housing developments that contain supportive housing units. Funds may be used for new construction, rehabilitation, acquisition and rehabilitation, or conversion of nonresidential structures.</p>	<ul style="list-style-type: none"> <li>• MHP-SH funds will be provided as permanent financing only. Eligible costs include project development capital costs, including child care, after-school care and social service facilities integrally linked to the restricted housing units.</li> <li>• Capital costs may involve real property acquisition; refinancing to retain affordable rents; necessary onsite and offsite improvements; reasonable fees and consulting costs; and capitalized reserves</li> </ul>
<p><b>Multifamily Housing Program: Homeless Youth Component (MHP-HY)</b></p>	<p>Provide low-interest loans to developers of affordable rental housing developments that contain units for homeless youth (HY). Funds may be used for permanent multifamily rental and transitional housing projects involving new construction, rehabilitation, acquisition and rehabilitation, or conversion of nonresidential structures</p>	<ul style="list-style-type: none"> <li>• Eligible costs include project development capital costs, including child care, after-school care and social service facilities integrally linked to the restricted housing units.</li> <li>• Capital costs may involve real property acquisition; refinancing to retain affordable rents; necessary onsite and offsite improvements; reasonable fees and consulting costs; and capitalized reserves</li> </ul>
<p><b>Predevelopment Loan Program (PDLP)</b></p>	<p>Short-term loans to provide predevelopment capital to finance the start of low-income housing projects in urban areas.</p>	<ul style="list-style-type: none"> <li>• Predevelopment costs include, but are not limited to, site control, site acquisition for future low-income housing developments, engineering studies, architectural plans, application fees, legal services, permits, bonding and site preparation.</li> </ul>

<p><b>Transit-Oriented Development Housing Program (TOD)</b></p>	<p>Provide funding to stimulate the production of higher density housing and related infrastructure within close proximity to qualifying transit stations that encourages increased public transit ridership and minimizes automobile trips</p>	<ul style="list-style-type: none"> <li>• New construction or substantial rehabilitation of rental housing, conversion of nonresidential structures to residential, and first-time homebuyer mortgage assistance for ownership units in qualified projects;</li> <li>• capital improvements required for a qualified housing or mixed-use project, such as sewer or water upgrades, streets, drainage, parking, noise mitigation, and utility access, connection or relocation;</li> <li>• capital improvements to enhance pedestrian or bicycle access from a qualified project to the nearest transit station, such as walkways, plazas, mini parks, signals, streetscape improvements, security enhancements, bicycle lanes and transportation information systems</li> </ul>
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<p><b>Proposition 1C</b></p>	<p>Proposition 1C is the successor to Proposition 46 which authorized 2.1 billion in State bonds for a variety of new housing investments. Proposition 1C authorized \$2.85 billion more General Obligation bonds to continue several bond-funded housing assistance programs, and begin new programs to improve infrastructure in support of housing.</p>	<ul style="list-style-type: none"> <li>• MHP</li> <li>• CalHome</li> <li>• MHP-SH</li> <li>• Serna</li> <li>• BEGIN</li> <li>• EHAPCD</li> <li>• TOD</li> <li>• MPH</li> <li>• Infill Housing</li> <li>• Affordable Housing Innovation</li> <li>• CalHFA</li> <li>• Parks</li> </ul>
<p><b>Federal Emergency Shelter Grant Program (FESG)</b></p>	<p>Fund emergency shelters, services and transitional housing for homeless individuals and families.</p>	<ul style="list-style-type: none"> <li>• Local government agencies and nonprofit organizations in communities that do not receive shelter funds directly from the U.S. Department of Housing and Urban Development (HUD).</li> <li>• Local nonprofit shelter and service organizations may also receive funds as service providers working in cooperation with local government agency applicants.</li> </ul>

<p><b>Governor’s Homeless Initiative (GHI)</b></p>	<p>An interagency effort to reduce homelessness by funding development of permanent supportive housing for persons with severe mental illness who are chronically homeless</p>	<ul style="list-style-type: none"> <li>• New construction, rehabilitation, acquisition and rehabilitation of permanent rental housing, and conversion of nonresidential structure to rental housing.</li> <li>• Projects must have DMH fund commitments for supportive services, typically require rent subsidies, and are not eligible if construction has started as of the application date.</li> <li>• Projects may use 9% federal low income housing tax credits as well as 4% credits.</li> <li>• Lower loan limits apply to 9% projects than 4% projects.</li> </ul>
<p><b>HOME Investment Partnership Program (HOME)</b></p>	<p>Assist cities, counties and nonprofit community housing development organizations (CHDOs) to create and retain affordable housing</p>	<ul style="list-style-type: none"> <li>• Rehabilitation, new construction, and acquisition and rehabilitation of single-family and multifamily housing projects, and predevelopment loans by CHDOs.</li> <li>• All activities must benefit lower-income renters or owners</li> </ul>
<p><b>Infill Infrastructure Grant Program</b></p>	<p>Fund infrastructure improvements to facilitate new housing development in residential or mixed use infill projects and infill areas</p>	<ul style="list-style-type: none"> <li>• Capital improvement projects that are part of, or necessary for the development of, qualifying infill projects or areas, including but not limited to parks or open space; water, sewer, or other utility service improvements; streets, roads, parking structures, or transit linkages and facilities; pedestrian or bicycle transit facilities; traffic mitigation; infill site preparation or demolition; or sidewalk or streetscape improvements</li> </ul>

<b>California Housing Finance Agency (CHFA) Multiple Rental Housing Programs</b>	Below market rate financing offered to builders and developers of multiple family and elderly housing. Tax-exempt bonds provide below-market mortgage money	<ul style="list-style-type: none"> <li>• New Construction</li> <li>• Rehabilitation/ Acquisition</li> </ul>
<b>California Housing Rehabilitation Program</b>	Low interest loans for the rehabilitation of substandard homes owned and occupied by lower-income households. City and non-profits sponsor housing rehabilitation projects.	<ul style="list-style-type: none"> <li>• Rehabilitation</li> <li>• Repair of Code Violations</li> <li>• Property Improvements</li> </ul>
<b>California Housing Finance Agency Home Mortgage Purchase Program</b>	CHFA sells tax-exempt bonds to provide below-market loans to first time homebuyers. Program is operated through participating lenders that originate loans purchased by CHFA	<ul style="list-style-type: none"> <li>• Homebuyer Assistance</li> </ul>
<b>California Housing Finance Agency HELP Program</b>	Unsecured loan from CHFA to provide affordable housing opportunities through program partnership with local government entities.	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• Infill</li> <li>• Predevelopment</li> <li>• New construction</li> <li>• Code Enforcement</li> </ul>
<b>Low Income Housing Tax Credit (LIHTC)</b>	Tax credits available to individuals and corporations that invest in low-income rental housing. Tax credits are sold to corporations and people with high tax liability, of which the proceeds are utilized for housing development	<ul style="list-style-type: none"> <li>• Rehabilitation/ Acquisition</li> <li>• New Construction</li> </ul>
<b>County Statewide Communities Program</b>	The City of Tustin is now a direct member of the program through a Joint Powers Authority and can participate directly.	<ul style="list-style-type: none"> <li>• Multi-family Housing</li> <li>• Private Mortgage Revenue Bonds</li> <li>• Acquisition</li> <li>• Rehabilitation</li> </ul>

<p><b>California Debt Limit Allocation Committee (CDLAC)</b></p>	<p>Allocation of private activity bond (tax-exempt mortgage revenue bond) to single-family housing.</p> <p>Low interest loan for multi-family housing rehabilitation or acquisition, or both.</p> <p>Provides limited term housing assistance combined with case management, employment services, childcare and other supportive services to welfare recipients.</p> <p>Grants, loans, and mortgage assistance to low and moderate-income families improving property with their own labor.</p> <p>Loans for pre-development or “seed” money to nonprofit corporations and local governments.</p> <p>Construction, maintenance, use, and occupancy of privately owned and operated employee-housing facilities.</p> <p>Provides unsecured loan for affordable housing projects.</p>	<ul style="list-style-type: none"> <li>• Mortgage Credit Certificate</li> <li>• Multi-family private mortgage revenue bond</li> <li>• Land lease Payment</li> <li>• New Construction</li> <li>• Pre-development costs</li> <li>• Employee Housing of five or more employees</li> <li>• Infill</li> <li>• Code Enforcement</li> <li>• First Time Homebuyers</li> <li>• Acquisition</li> <li>• Rehabilitation</li> </ul>
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<b>CDLAC continued</b>	<p>Low interest loans for housing construction for individuals and families with special needs.</p> <p>Low interest and down payment program for low and moderate-income first time homebuyers.</p> <p>Permanent financing for new construction, acquisition/rehabilitation, and acquisition of multi-family projects</p>	
<b>FEDERAL RESOURCE -ENTITLEMENT</b>		
<b>Community Development Block Grant (CDBG)</b>	<p>Entitlement program that is awarded to the City on a formula basis. The objectives are to fund housing activities and expand economic opportunities. Projects must meet one of three national objectives: benefit low- and moderate-income persons; aid in the prevention or elimination of slums or blight; or meet other urgent needs.</p>	<ul style="list-style-type: none"> <li>• Section 108 Loan Repayments</li> <li>• Public Services Activities</li> <li>• Historic Preservation</li> <li>• Admin. &amp; Planning</li> <li>• Code Enforcement</li> <li>• Public Facilities Improvements</li> <li>• Housing Activities</li> <li>• Economic Development</li> <li>• Rehabilitation</li> </ul>
<b>Mortgage Credit Certificate (MCC)</b>	<p>Federal tax credit for low- and moderate-income homebuyers who have not owned a home in the past three years. Allocation for MCC is provided by the State through the County of Orange.</p>	<ul style="list-style-type: none"> <li>• First Time Home Buyer Assistance</li> </ul>

<b>HOME Investment Partnership (HOME) Program</b>	Grant program for housing. The intent of this program is to expand the supply of decent, safe, and sanitary affordable housing. HOME is designed as a partnership program between the federal, state, and local governments, non-profit and for-profit housing entities to finance, build/rehabilitate and manage housing for lower-income owners and renters	<ul style="list-style-type: none"> <li>• Multi-Family Acquisition/Rehab</li> <li>• Single-Family Homebuyer Assistance</li> <li>• CHDO Assistance</li> <li>• Administration</li> <li>• Rental Assistance</li> </ul>
<b>Emergency Shelter Grants (ESG)</b>	Annual grant funds are allocated on a formula basis. Funds are intended to assist with the provision of shelter and social services for homeless	<ul style="list-style-type: none"> <li>• Homelessness Prevention (acquisition, new construction, rehabilitation, conversion)</li> <li>• Supportive Services</li> <li>• Operating Expenses</li> </ul>
<b>Housing Opportunities for Persons with AIDS (HOPWA)</b>	Funds are made available countywide for supportive social services, affordable housing development, and rental assistance.	<ul style="list-style-type: none"> <li>• Rental Assistance</li> <li>• Supportive Social Services</li> <li>• Administration</li> </ul>
<b>Shelter Plus Care Program (S+C)</b>	Supportive housing and services for persons with disabilities-grants for rental assistance offered with supportive services to homeless with disabilities and disabled households.	<ul style="list-style-type: none"> <li>• Rental Assistance</li> </ul>
<b>FEDERAL RESOURCES - COMPETITIVE</b>		

<b>Supportive Housing Grant</b>	Grants to improve quality of existing shelters and transitional housing. Increase shelters and transitional housing facilities for the homeless	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• New Construction</li> </ul>
<b>Section 8 Rental Assistance</b>	Rental assistance program which provides a subsidy to very low-income families, individuals, seniors and the disabled. Participants pay 30 percent of their adjusted income toward rent. The Orange County Housing Authority pays the balance of rent to property owners, and administers the program.	<ul style="list-style-type: none"> <li>• Rental Assistance</li> </ul>
<b>Section 202</b>	Grants to non-profit developers of supportive housing for the elderly	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• New Construction</li> <li>• Rental Assistance</li> <li>• Support Services</li> </ul>
<b>Section 811</b>	Grants to non-profit developers of supportive housing for person with disabilities, including group homes, independent living facilities and intermediate care facilities	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• New Construction</li> <li>• Rental Assistance</li> </ul>
<b>HOPE</b>	Homeownership assistance awarded on a competitive basis requires non-federal matching funds.	<ul style="list-style-type: none"> <li>• Homeownership of Multi-family units (HOPE 2)</li> <li>• Homeownership of Single-family homes (HOPE 3)</li> </ul>

<b>McKinney Act Supportive Housing Program (SHP)</b>	Grants to develop supportive housing and services and services that will enable homeless people to live as independently as possible.	<ul style="list-style-type: none"> <li>• Transitional Housing</li> <li>• Permanent Housing For Homeless With Disabilities</li> <li>• Supportive Services, such as child care, employment assistance and outpatient services for the homeless</li> </ul>
<b>Section 8 Moderate Rehabilitation Single Room Occupancy Program (SRO-Section 8)</b>	Funds to rehabilitate single-room units within a building of up to 100 units. The provision of supportive services is optional.	<ul style="list-style-type: none"> <li>• Rehabilitation</li> <li>• New Construction</li> </ul>
<b>Small Projects Processing (SPP)- (221 (d)(4) and 223 (f))</b>	Mortgage Insurance program for small multi-family new construction or substantial rehabilitation (221)(d)(4) and small multi-family rehabilitation	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• New Construction</li> </ul>
<b>Section 108 Loan</b>	Provides loan guarantee to CDBG entitlement jurisdictions for pursuing large capital improvement or other projects. The jurisdiction must pledge its future CDBG allocations for loan repayment. Maximum loan amount can be up to five times the entitlement jurisdiction's most recent approved annual allocation. Maximum loan term is 20 twenty years.	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• Home Buyer Assistance</li> <li>• Homeless Assistance</li> <li>• Public Improvement</li> <li>• Economic Development</li> <li>• Relocation, clearance, site improvements</li> </ul>
<b>HUD Mortgage Insurance for Purchase/ Refinance</b>	Mortgage Insurance for purchase or refinance of existing multifamily projects.	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• New Construction</li> <li>• Operation Administration</li> </ul>

<b>HUD Rehabilitation Loans for Multifamily Projects</b>	Provides mortgage insurance for improvements, repairs, or additions to multi-family projects.	<ul style="list-style-type: none"> <li>• Energy Conservation</li> <li>• Rehabilitation</li> </ul>
<b>Disposition of HUD Multifamily Housing</b>	To dispose of multi-family housing owned or financed by HUD that is delinquent, under workout or foreclosed with mechanisms designed to preserve the low- and moderate-income housing stock.	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• New Construction</li> <li>• Operation Administration</li> <li>• Preservation</li> </ul>
<b>HUD Single-Family Property Disposition Program</b>	Sells HUD-acquired single-family properties to expand homeownership opportunities and strengthen neighborhoods. Up to 10% of HUD-help single-family properties are made available for lease for use in homeless programs. Rent is \$1 per year.	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Rehabilitation</li> </ul>
<b>Homeless Providers Grant and Per Diem Program</b>	Provides grants to develop programs that help veterans recover from homelessness, including establishing transitional housing and supportive services for homeless veterans.	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Operation Administration</li> <li>• Single Room Occupancy Hotels</li> <li>• Social Services</li> <li>• Transitional Housing</li> </ul>
<b>PRIVATE RESOURCES</b>		
<b>Federal National Mortgage Association</b>	Community Home Buyer Program – Fixed rate Mortgages	<ul style="list-style-type: none"> <li>• Homebuyer Assistance</li> </ul>

<b>(Fannie Mae)</b>	Community Home Improvement Mortgage Program – Mortgages for both purchase and rehabilitation of a home	<ul style="list-style-type: none"> <li>• Homebuyer Assistance/Rehab</li> </ul>
	Fannie Neighbor – Underserved low-income minorities are eligible for low down-payment mortgages for the purchase of single family homes	<ul style="list-style-type: none"> <li>• Expand Home Ownership for Minorities</li> </ul>
<b>Federal Home Loan Mortgage Corporation (Freddie Mac)</b>	<p>Purchases/secures high loan to value ratio single-family home purchase loan to assist low income families</p> <p>Rehabilitation Mortgages Program insured mortgages for property acquisition and rehabilitation</p>	<ul style="list-style-type: none"> <li>• Homebuyer Assistance</li> <li>• Acquisition</li> <li>• Rehabilitation</li> </ul>
<b>California Community Reinvestment Act (CRA)</b>	<p>Assistance to low income minority neighborhoods, including the construction, rehabilitation, bridge and acquisition finance needs of developers of affordable rental and for-sale housing, as well as first time, low and moderate income homebuyers.</p> <p>Provides funds to qualified affordable housing projects that would not meet customary criteria or existing secondary mortgage market requirements or for which there is no secondary market</p> <p>Provides interest rate at 20 basis point below 11<sup>th</sup> District costs of funds.</p>	<ul style="list-style-type: none"> <li>• New Construction</li> <li>• Rehabilitation</li> <li>• Acquisition</li> </ul>
<b>Federal Home Loan Bank Affordable Housing Program</b>	Direct subsidies to non-profit and for-profit developers, and public agencies for affordable low-income ownership and rental projects	<ul style="list-style-type: none"> <li>• New Construction</li> <li>• Expand Home Ownership for Lower Income Persons</li> </ul>
<b>California Organized Investment Network (COIN)</b>	Provides financing for affordable rental or ownership housing.	<ul style="list-style-type: none"> <li>• Affordable housing financing</li> </ul>

<p><b>McAuley Institute</b></p>	<p>Revolving Loan fund and technical assistance to build or rehabilitate housing.</p>	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Homeless Shelters</li> <li>• New Construction</li> <li>• Rehabilitation</li> <li>• Self-Help Housing</li> <li>• Single Room Occupancy Hotels</li> <li>• Transitional Housing</li> </ul>
<p><b>Mercy Loan Fund</b></p>	<p>Makes loans to projects in which conventional financing is not available or not affordable and promotes innovative and effective financing arrangements.</p>	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Group Homes/ Congregate Care</li> <li>• Infrastructure Development</li> <li>• Mobile home Park Purchase Assistance</li> <li>• New Construction</li> <li>• Preservation</li> <li>• Rehabilitation</li> <li>• Self-Help Housing</li> <li>• Single Room Occupancy Hotels</li> <li>• Transitional Housing</li> </ul>
<p><b>Neighborhood Housing Services</b></p>	<p>NHS is a three-way partnership among neighborhood residents, local governments and local businesses. The Neighborhood Reinvestment Corporation provides direct technical assistance, expendable grants, and capital grants to NHS, which makes loans for rehabilitation.</p>	<ul style="list-style-type: none"> <li>• Energy Conservation</li> <li>• Operation Administration</li> <li>• Rehabilitation</li> </ul>

<b>World/BRIDGE Initiative</b>	Provides lower-interest construction financing for affordable or mixed-income rental housing or affordable home ownership through a consortium of World Savings/Calpers/Wells Fargo/Bank of America	<ul style="list-style-type: none"> <li>• New Construction</li> <li>• Rehabilitation</li> <li>• Acquisition</li> </ul>
<b>Non Profit Organizations</b>	According to the State Department of Housing and Community Development, three nonprofit agencies in Orange County have expressed interest in purchasing and or managing at risk or replacement units in the Tustin area.	<ul style="list-style-type: none"> <li>• Acquisition and rehabilitation</li> <li>• Management of multi-family units</li> </ul>
<b>Orange County Affordable Housing Clearinghouse</b>	Non-profit lender consortium	<ul style="list-style-type: none"> <li>• Construction Financing</li> <li>• Permanent Financing</li> </ul>

Source: City of Tustin Comprehensive Affordable Housing Strategy 2008-2018

In addition to these resources, there are also potential public and private resources that may be available to the City.

## **HOUSING PROGRAMS**

The following matrix identifies existing and new housing programs to be implemented during the 2013-2021 period. Table H-20 is a comprehensive summary of the City’s quantified objectives set forth for each program for the planning period 2013-2021. The programs are organized according to the goals described previously.

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<b>Goal 1: Adequate Housing Supply</b>				
<p><b>1.1 Available Sites</b> Continue to utilize Planned Community Districts and Specific Plans to authorize and encourage mixed-use developments. (See Zoning Studies Program). Housing Element Policies: 1.1, 1.5, 1.9</p>	Community Development Department, Successor Agency, City Council	City General Fund; City and Agency staff time involved	Assist in the development of new affordable owner and rental housing through development in MCAS - Tustin and infill areas. The City supports applications for the creation of new mixed-use developments particularly when the projects involve affordable housing	On-going
<p><b>1.2 Mobile Homes</b> Continue to maintain the City's mobile home park zone and process conditional use permit applications as received for manufactured homes. Housing Element Policies: 1.1, 1.4</p>	Community Development Department, City Council	City General Fund; processing fees (recoverable)	The City will continue to maintain the existing mobile home park zone.	Process applications as received in a timely manner
<p><b>1.3 Second Residential Units</b> Continue to provide opportunities for affordable second residential dwelling units on Single-family Residential District lots where feasible through existing Zoning Ordinance provisions. Housing Element Policies: 1.1, 1.8</p>	Community Development Department, City Council	City processing fees (recoverable)	The City has updated its Zoning Code to allow second units to be developed within Single Family zoned properties without the need for any discretionary actions.  During the planning period, five (5) second units are anticipated.	Process applications as received in a timely manner
<p><b>1.4 Deed Restrictions</b> Require appropriate deed restrictions to ensure continued affordability for low- or moderate-income housing constructed or rehabilitated with the assistance of any public funds as may</p>	Community Development Department, Successor Agency,	Tax-Exempt Mortgage Revenue Bonds	All affordable housing created during the planning period will be required to record deed restriction to ensure continued affordability	Include conditions of approval at entitlement and requires recordation

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
be legally required. Housing Element Policies: 1.1	City Council		for a minimum of 45 years.	of deed restriction prior to issuance of Certificate of Occupancy for affordable units.
<b>1.5 Pre-application Conferences</b> Continue to utilize procedures for pre-application conferences and processing procedures to expedite permit processing. Housing Element Policies: 1.12	Community Development Department	City General Fund; City processing fees (recoverable)	Continue	On-going
<b>1.6 Permit Processing for Low- and Moderate Income Housing</b> Ensure that processing of permits for low- and moderate-income housing are fast-tracked with low- and moderate-income housing permits being given priority over other permit applications. Housing Element Policies: 1.12	Community Development	City General Fund; City processing fees (recoverable)	Continue	Process application in a timely manner
<b>1.7 Permit Coordination</b> Continue the services of the City's Community Development Department as a central clearinghouse with individuals assigned the responsibility of expediting development permits required from various departments and agencies. Housing Element Policies: 1.12	Community Development	City General Fund; City processing fees (recoverable)	Continue	By 2021

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p><b>1.8 Housing for People with Developmental Disabilities</b></p> <p>Work with the Regional Center of Orange County to implement an outreach program that informs families within the City of affordable housing and services available for persons with developmental disabilities.</p> <p>Housing Element Policies: 1.11, 1.13, 1.15</p>	<p>Community Development Department</p>	<p>General Fund</p>	<p>Implement outreach program through City website and social media.</p>	<p>By 2015</p>
<p><b>1.9 Housing for the Disabled</b></p> <p>Require new multi-family housing units and apartment conversions to condominiums to comply with State specifications pursuant to SB 520 for accommodation of the disabled. The City will conduct analysis, add procedures, and/or undertake appropriate amendments to existing standards and complying with Chapter 11 of the California Building Code (requires portion of multi-unit dwellings to be accessible dwelling units) to ensure accommodation for the disabled.</p> <p>Housing Element Policies: 1.11, 1.13, 1.15</p>	<p>Community Development Department</p>	<p>State and Federal programs; City's General Fund.</p>	<p>Refer individuals to agencies providing supportive housing that accommodates independent living. Add procedures and/or undertake appropriate amendments to existing standards to ensure compliance with SB 520.</p>	<p>On-going; implement requirements of SB 520 on continuous basis.</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p><b>1.10 Transitional Housing</b></p> <p>Encourage the continuation of the Sheepfold homes and Laurel House in Tustin, which provide housing facilities for battered homeless women and children. These homes are located in single-family neighborhoods and provide a much-needed service for homeless women and children. In addition, explore additional program options to assist in the provision and funding for other programs such as transitional housing and single room occupancy housing.</p> <p>Housing Element Policies: 1.11, 1.14</p>	<p>Various Non-Profit Organizations, Successor Agency, Community Development Department</p>	<p>Variety of private funds; CDBG funds</p>	<ul style="list-style-type: none"> <li>• Promote, assist, and facilitate the development of emergency and transients’ shelters through continued support of the County Homeless Assistance Program</li> <li>• Support local agencies that provide homeless services by providing financial assistance of approximately \$5,000-\$10,000 annually.</li> <li>• Consider the adoption of a Single Room Occupancy Ordinance to facilitate the development of SRO units.</li> </ul>	<p>On-going assistance to local non-profits and adoption of SRO Ordinance by 2016.</p>
<p><b>1.11 Temporary Housing for Homeless</b></p> <p>The City will also support countywide efforts to assist approved homeless providers as part of the MCAS Tustin Reuse effort.</p> <p>Housing Element Policies: 1.11, 1.14</p>	<p>County of Orange, Community Development Department</p>	<p>CDBG funds, HUD SHP funds</p>	<ul style="list-style-type: none"> <li>• Continue to participate on the Orange County City Managers/Planning Directors SB 2 Task Force</li> <li>• Continue to support 192 emergency housing units to single men and women at Tustin Legacy (Orange County Rescue Mission).</li> <li>• The City plans to assist 200 individuals by means of integrating counseling, education, job-training and other techniques to stop the</li> </ul>	<p>The MCAS Tustin Specific Plan provided sites and designated land uses to accommodate the identified homeless needs. As a result the following have been accomplished:</p> <p>The 192 emergency housing to be operated by the Rescue Mission was completed in 2008.</p> <p>A total of 48</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			<p>cycle of homelessness.</p> <ul style="list-style-type: none"> <li>• Continue to support 24 units of transitional housing for families (operated by Salvation Army)</li> <li>• Continue to support 6 units of transitional housing for women and children (operated by Human Options-Dove Housing)</li> <li>• Continue to support 6 units- in long-term 12-24 months- transitional housing for families with children (operated by Orange Coast Interfaith Shelter)</li> <li>• Continue to support 14 units of transitional housing to families with children who are homeless due to a short or temporary financial hardship (operated by Families Who Care, formerly Irvine Temporary Housing)</li> <li>• Continue to support the Tustin Family Campus (operated by the County of Orange)</li> </ul>	<p>transitional homes were conveyed to Salvation Army, Human Options, Orange Coast Interfaith Shelter, and Irvine Temporary Housing at no costs before 2008.</p> <p>The City approved an increase in the capacity of the Orange County Social Services (Orangewood) from 60 beds to 90 beds. The project is currently under construction.</p> <p>The City through CDBG funds would provide assistance to support non-profit organization annually.</p>
<p><b>1.13 Bonding Programs</b> Utilize housing revenue bond financing resources and Low Income Housing Tax Credits on new construction and</p>	<p>Community Development Department; Housing</p>	<p>State and Municipal Bonds; Private Activity Mortgage Bonds Revenue issued by</p>	<p>Complete analysis of available programs on as needed basis.</p>	<p>On-going</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p>acquisition/rehabilitation projects that help meet the City’s affordable housing needs.</p> <p>Housing Element Policies: 1.7, 3.2</p>	<p>Authority</p>	<p>California Statewide Communities Development Authority and others; California Low-Income Housing Tax Credits; variety of other sources</p>		
<p><b>1.14 Economic Integration within Sphere of Influence</b></p> <p>Request that the Orange County Planning Commission and the Environmental Management Agency (EMA) notice the City of Tustin of any proposed development activities within Tustin’s sphere of influence.</p> <p>Housing Element Policies: 1.1, 1.6</p>	<p>County of Orange</p>	<p>City General Fund; Staff time</p>	<p>Ongoing request to both agencies.</p>	<p>On-going</p>
<p><b>1.15 Senior Citizen Housing</b></p> <p>Continue to preserve existing sites and identify new sites that are suitable for senior citizens housing projects. These sites will be promoted for private development and applications will be made for any available subsidy funds.</p> <p>Housing Element Policies: 1.1, 1.11, 1.13</p>	<p>Successor Agency; Community Development Department</p>	<p>HELP; Low-Income Housing Tax Credits; Private Activity Bonds issued by California Statewide and others</p>	<p>Preservation of 100 at-risk units at Tustin Gardens, and identification of new senior housing sites.</p>	<p>The City is in contact with the owner of Tustin Gardens. . The City monitors the project on an ongoing basis. New sites will be identified on an ongoing basis.</p>
<p><b>1.16 Senior Services Program</b></p> <p>Develop a comprehensive transportation program, case management, information and referral, and shared housing program.</p>	<p>Parks and Recreation Department</p>	<p>City General Funds</p>	<p>Assist 950 elderly annually</p>	<p>On-going</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
Housing Element Policies: 1.15, 2.3				
<p><b>1.17 Recycling Single-Family Uses in R-3 Zones Into Multiple-Family Units</b></p> <p>Continue to encourage developers to consolidate individual lots into larger cohesive developments. Density bonuses, parking reductions, height and lot coverage exceptions, and reduction of processing fees may be considered as an incentive to consolidate lots.</p> <p>Housing Element Policies: 1.2</p>	Community Development Department	City General Fund; Staff time	Eight (8) housing units are anticipated	Support application as received
<p><b>1.18 Ongoing Review of Housing Element Programs</b></p> <p>From the date of adoption of the Housing element, prepare an annual report to the Planning Commission assessing previous years' accomplishments toward meeting Housing Element objectives. Submit the Annual Report to the State HCD.</p> <p>Housing Element Policies: all policies</p>	Community Development Department	City General Fund; Staff time	Prepare Annual Report to the Planning Commission and the City Council annually.	Submit Annual Report to HCD by April 1 each year.
<p><b>1.19 Consolidated Plan</b></p> <p>The City of Tustin shall prepare an update of the Consolidated Plan that provides a comprehensive assessment of housing needs, a housing development plan incorporating Federal, State and local public and private resources, and a one-year implementation plan.</p> <p>Housing Element Policies: 1.12, 1.16, 1.18, 2.1, 4.1, 4.2, 4.3, 4.4, 5.1, 5.2, 5.3, 5.4, 5.5</p>	Community Development Department	Variety of local, State, and Federal funding; City General Fund Staff time	Prepare Consolidated Plan in 2014  Prepare Action Plan annually	Prepare Consolidated Plan in 2014  Prepare Action Plan annually
<b>1.20 Zoning Studies</b>	Successor Agency and Community	City General Fund,	Initiate Zoning Studies by 2015 and complete any proposed	By 2018. In 2008, the City completed the

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p>To facilitate the new construction goals of the 2012 Regional Housing Needs Assessment, the City intends to undertake zoning studies to consider new programs to encourage and promote affordable housing and recommend appropriate amendments for actions by the Planning Commission and the City Council. These studies include:</p> <p>(1) Creation of zoning provisions which will accommodate mixed uses in portions of the City, particularly in the Old Town Commercial Area;</p> <p>(2) Provide relaxation of certain development standards and incentives for projects which include affordable housing units particularly housing units for the extremely-low income upon City Council’s approval;</p> <p>Housing Element Policies: 1.1, 1.12</p>	<p>Development Department</p>		<p>amendments by 2021.</p>	<p>Market Analysis and conducted community meetings to gather input for the opportunity sites (Town Center A New Beginning).</p>
<p><b>1.21 Private Streets</b></p> <p>The City of Tustin has adopted standards for private streets in new residential developments. To reduce construction costs, developers may be permitted to install private rather than public streets, wherever feasible.</p> <p>Housing Element Policies: 1.17</p>	<p>City of Tustin</p>	<p>None necessary</p>	<p>Continue</p>	<p>On-going</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p><b>1.22 Building Codes</b></p> <p>The State of California has determined that the over-riding value is the protection of the health and safety of residential occupants. Continue to adopt the Uniform Building Code pursuant to the state directives and where local amendments are proposed to reflect local climatic, geologic or topographic conditions, and minimize, wherever possible, impacts on provision of housing.</p> <p>Housing Element Policies: 5.4</p>	<p>City of Tustin, Community Development Department</p>	<p>City General Fund; Staff time</p>	<p>On-going</p>	<p>On-going</p>
<p><b>1.23 Site Improvements</b></p> <p>The requirement for the developer to construct site improvements often results in passing these costs on the housing consumer. These costs are reflected in the cost of housing that eliminates an even greater proportion of the population from financially qualifying for the purchase of housing. The financing of public improvements by a special assessment district or community facility district on a per parcel benefit basis may enable a greater proportion of the market to qualify for housing. Assessment district financing has been implemented in the East Tustin and Tustin Legacy areas and is being used to pay for public improvements. The City will assess opportunities to continue to utilize these public improvement financing techniques in newly developing areas such as Tustin Legacy and determine whether they are financially feasible. In creating any new assessment districts, an evaluation should be completed of the developer's activity to advance pay off bonds at the close of escrow.</p> <p>Housing Element Policies: 1.7</p>	<p>Community Development Department,</p>	<p>Developer funded</p>	<p>Evaluate the use of special assessment district funding at Tustin Legacy and its use in other developing areas.</p>	<p>On-going. As development progresses at Tustin Legacy, the City will evaluate financing mechanism to fund infrastructure improvements.</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p><b>1.24 Fees, Exactions, and Permit Procedures</b></p> <p>Consider waiving or modifying various fees or exactions normally required where such waiver will reduce the affordability gap associated with providing housing of the elderly and for very-low and low-income households.</p> <p>Housing Element Policies: 1.12</p>	<p>Community Development Department,</p>	<p>City General Fund;</p>	<p>Defer development impact fees during economic downturns.</p>	<p>The City Council adopted a policy in 2008 to temporarily defer the payment of specific development impact fees to prior to final inspection or issuance of Certificate of Occupancy. Adoption of a new policy will be evaluated and considered on an annual basis.</p>
<p><b>1.25 Environmental Constraints</b></p> <p>Continue to alleviate the necessity of delays in processing, and mitigating requirements incorporated into the development plans by requiring program environmental impact reports (EIR) on all major development projects whenever possible.</p> <p>Housing Element Policies: 1.12</p>	<p>Community Development Department,</p>	<p>General Fund; Private developer cost recoverable</p>	<p>On-going</p>	<p>On-going</p>
<p><b>1.26 Density Bonus Program</b></p> <p>Promote Density Bonuses to facilitate the construction of affordable housing. Under State law, applicants may file for density bonuses when projects incorporate units for very low, low, moderate-income units or senior citizens.</p> <p>Housing Element Policies: 1.8</p>	<p>Community Development Department</p>	<p>General Fund,</p>	<p>Process all requests for density bonuses.</p>	<p>On-going</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p><b>1.27 MCAS-Tustin Implementation</b> Implementation of the Specific Plan for MCAS-Tustin site Housing Element Policies: 1.1, 1.3, 1.5</p>	Successor Agency	General Fund	Process entitlements for MCAS Tustin	On-going
<p><b>Goal 2: Equal Housing Opportunity</b></p>				
<p><b>2.1 Fair Housing</b> The City shall continue to provide housing counseling services to assure equal housing opportunities within the City. The City allocates approximately \$15,000 annually for handling tenant/landlord disputes, housing discrimination cases, counseling, tenant rights, fair housing education, and education within the City. The City will continue to promote the fair housing educational resources offered by adding the services on the City’s webpage, Code Enforcement brochure, and the Community Development Directory. Housing Element Policies: 2.1, 2.2, 2.4</p>	Community Development Department, City’s contractor	CDBG funds	Assist approximately 400 Tustin residents annually, 3,000 residents by 2021.	On-going; complete educational resources by 2021
<p><b>2.2 Shared-Housing</b> Continue to provide coordination and support to a home sharing program funded in part by the Community SeniorServ, formerly known as Feedback Foundation, Inc., as part of TLC (Transportation Lunch and Counseling) and the Orange County Housing Authority. Housing Element Policies: 2.3</p>	TLC, Parks and Recreation Services Department, and Community Development Department	CDBG funds	Continue	On-going

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p><b>2.3 Housing Referral Program</b></p> <p>Continue to provide housing referral services to families in need of housing assistance and information. This program consists of three City departments disseminating information to the public at all times.</p> <ul style="list-style-type: none"> <li>• The Police Department refers homeless people to different agencies that provide shelters and food for various segments of the population.</li> <li>• The Parks and Recreation Services Department provides housing information and social service information to the senior citizen population.</li> <li>• The Community Development Department provides housing and social service information to all segments of the population during regular city hall business hours. The Community Development Department also serves as a clearinghouse for the Community Development Block Grant Program and represents the City at Housing Authority and OCHA Advisory Committee Meetings.</li> </ul> <p>City departments utilize the following documents and also make these documents available to the public:</p> <ul style="list-style-type: none"> <li>• Directory of Senior Citizen’s Services prepared by the Area Agency on Aging Senior Citizen’s Office</li> <li>• Social Service Assistance Booklet prepared by Connection Plus</li> <li>• Orange County Housing Directory prepared by OCHA and the OCHA Advisory Committee.</li> </ul> <p>Housing Element Policies: 2.1,2,2,2.3,2.4,2.5</p>	<p>Police Department;</p> <p>Parks and Recreation Department;</p> <p>Community Development;</p>	<p>City General Fund, CDBG Funds</p>	<ul style="list-style-type: none"> <li>• 7,500 referrals to social agencies by 2021</li> <li>• 50 referrals for shared housing by 2021</li> </ul>	<p>On-going</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<b>Ongoing Review of Housing Element Programs</b>	See Program1.18			
<b>Consolidated Plan</b>	See Program 1.19			
<b>Goal 3: Ownership Housing</b>				
<b>3.1 Condominium Conversions</b> Continue to require developers converting apartments to condominiums to process a conditional use-permit, provide relocation assistance, and/or to provide incentives and assistance for purchase of the units by low- and moderate-income households. Housing Element Policies: 3.1, 3.2, 3.3	Community Development Department, City Council,	City General Fund,	Impose requirements where applicable.	On-going
<b>3.2 State Home-Ownership Assistance</b> The Housing Authority applies for and will explore the use of other funding opportunities such as HELP, HOME funds, and other State and Federal programs. Housing Element Policies: 3.1, 3.3	Housing Authority	State and Federal sources	Assist 30 First time homebuyers by 2021	By 2021
<b>Bonding Programs</b>	See Program1.13			
<b>Ongoing Review of Housing Element Programs</b>	See Program1.18			
<b>Consolidated Plan</b>	See Program1.19			
<b>Goal 4: Affordable Housing Preservation</b>				

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p><b>4.1 Housing Authority</b></p> <p>Contract with the Orange County Housing Authority, where necessary, for the development and operation of federally assisted low- and moderate-income housing programs.</p> <p>Housing Element Policies: 1.3, 1.7, 1.14</p>	<p>Orange County Housing Authority,</p>	<p>HUD, CDBG,</p>	<p>Continue</p>	<p>On-going</p>
<p><b>4.2 Rental Assistance</b></p> <p>Encourage the availability of Section 8 rental assistance certificates and voucher certificate program assistance funds through the Orange County Housing Authority by participating in the application process i.e. advertise, promote on website, at library, senior center etc. when application are available; offering City Hall as the application and information center for Section 8 vouchers;; engaging and participating with the County’s housing advisory committee to ensure priorities are given to Tustin residents, and promote Section 8 program to apartments owners to expand Section 8 housing inventory within the City of Tustin. To encourage the maintenance of existing and establishment of new certificates, support the County’s efforts to obtain continued Federal funding.</p> <p>Housing Element Policies: 4.1, 4.2</p>	<p>County of Orange Housing Authority</p>	<p>HUD</p>	<p>Issue 200 certificates/ vouchers annually- 1,600 by 2021.</p>	<p>On-going</p>
<p><b>4.3 Affordable Senior Housing Project and Senior Board and Care Facility</b></p> <p>To maintain 74 units of affordable housing for Seniors located at 17432-17442 Mitchell Avenue (20 units) and 54 units affordable senior apartments at 1311 Sycamore Avenue (Heritage Place).</p> <p>Housing Element Policies: 5.1, 5.2, 5.3, 5.4</p>	<p>Community Development Department</p>	<p>None necessary</p>	<p>Maintain 74 units of affordable Senior Housing.</p>	<p>On-going</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p><b>4.4 Preservation of Assisted Housing</b></p> <p>Tustin has one low-income housing project with a total of 100 units “at-risk” of conversion to market rate during the planning period. If project owners choose to convert the projects to market rate housing, the City will coordinate the provision of financial and administrative resources to preserve these units as affordable housing.</p> <p>a) Monitor Units at Risk: Maintain contact with owners of at-risk units as potential conversion dates approach to determine whether Section 8 contracts or affordability covenants have been renewed or are planned to be renewed. Discuss with the owner of the “at-risk” projects the City’s desire to preserve the units as affordable.</p> <p>b) Work with a nonprofit affordable housing developer to apply for 4% Tax Credit/Bond Financing for the acquisition and rehabilitation of Tustin Gardens, preserving 100 at-risk units.</p> <p>c) Tenant Education. Work with tenants of at-risk units in danger of converting. Provide tenants with information regarding potential tenant purchase of buildings including written information and any related workshops. Act as a liaison between tenants and nonprofits potentially involved in constructing or acquiring replacement housing. If existing staff is not able to provide adequate staffing for this program, provide outside consultants to support the program.</p> <p>d) Reserve Fund. Continue to monitor other potential funding sources, such as State grants and HUD funds.</p> <p>Housing Element Policies: 4.1, 4.2, 4.3, 4.4</p>	<p>Community Development Department, Successor Agency</p> <p>Successor Agency working with a non-profit affordable housing developer</p> <p>Community Development Department, Successor Agency</p>	<p>State and Federal Funds</p> <p>4% Tax Credit and Bond Financing, other funding sources</p> <p>State grants and HUD funds</p>	<p>Pursuant to Government Code Section 65583.1(c), preserve at minimum 100units currently identified as “at- risk” at Tustin Gardens for the time frames required by applicable Government Code Section 65583.1.(c)(2)(C)(i) or Health and Safety Code section</p> <p>Preserve 100 units at Tustin Gardens</p>	<p>The City is in contact with Tustin Gardens and is monitoring their annual renewal option.</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p><b>4.5 Temporary Housing Assistance for Extremely Low Income Households</b></p> <p>Assist in the provision of temporary and emergency housing assistance to prevent homelessness for the extremely low income households as well as coordination with regional, state and federal assistance programs for assisting these households in the percentage of their incomes that are applied to rent (i.e. increase in allocation of Section 8 existing rental certificates, etc.).</p> <p>Housing Element Policies: 1.7, 1.11, 1.15, 1.18</p>	Successor Agency and Community Development Department	HUD Section 8 Program, CDBG	Promote, assist, and facilitate programs to prevent extremely low income households to become homeless by providing links and program information on City's website and at the Tustin Library, Senior Center, and Family and Youth Center	By 2015
<p><b>4.6 Housing Rehabilitation</b></p> <p>Allocate available resources to finance the rehabilitation of residential units in target areas</p>	Successor Agency and Housing Authority	Available federal, state, and local resources	Subject to available funding	Subject to available funding
<b>Mobile Homes</b>	See Program 1.2			
<b>Deed Restrictions:</b>	See Program 1.4			
<b>Transitional Housing</b>	See Program 1.10			
<b>Ongoing Review of Housing Element Programs</b>	See Program 1.18			
<b>Consolidated Plan</b>	See Program 1.19			
<b>Goal 5: Neighborhood Conservation</b>				

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p><b>5.1 Enforcement of Building and Housing Codes</b></p> <p>Continue to enforce building and housing codes to ensure health and safety, rectify Code violations and thereby improve the overall character of the community. Enforcement will include identifying substandard housing units and those that are otherwise identified as a threat to the health and safety of occupants. Actions will be taken pursuant to the law to demolish, rebuild, or correct the code violations. This program includes notification of taxing agencies upon failure to gain code compliance from the property owner to allow City to recover enforcement cost.</p> <p>Housing Element Policies: 5.3, 5.4</p>	<p>Community Development Department</p>	<p>City General Fund</p>	<p>Investigate 30 substandard housing cases annually and 240cases by 2021.</p>	<p>On-going</p>

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p><b>5.2 Cultural Resources District</b></p> <p>There are a large number of structures in the City that were constructed before and after the turn of the century. Continue to utilize the City’s Cultural Resources Overlay District to safeguard the heritage of the City by preserving neighborhoods and structures that reflect the City’s heritage and past. Through the District, promote the public and private enjoyment, use and preservation of culturally significant neighborhoods and structures. Continue to require that any alteration of a designated resource or construction improvements in the District conform to the requirements of the Cultural Resources Overlay District. Owners of historic landmarks or properties within the District are required to obtain a certificate of appropriateness before beginning any type of exterior construction, alteration, or demolition. A certificate of appropriateness certifies that the proposed changes are consistent with the design guidelines and are appropriate within the district context.</p> <p>Housing Element Policies: 5.5</p>	Community Development Department	CDBG, City General Fund, State grants	Rate historic structures where applicable and process certificates of appropriateness as received.	Process Certificates of Appropriateness as received. Explore Certified Local Government (CLG) grant to update the City’s Historical Resources Survey and Report by 2021.
<b>Ongoing Review of Housing Element Programs</b>	See Program 1.18			
<b>Consolidated Plan</b>	See Program 1.19			
<b>Building Codes</b>	See Program 1.22			
<b>Goal 6: Environmental Sensitivity</b>				
<p><b>6.1 Energy Conservation</b></p> <p>Require all new construction to be subject to State energy</p>	Community Development	None necessary	Require all new units within planning period.	On-going and currently in force.

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
conservation requirements (Title 24) as a condition for the issuance of a building permit. Housing Element Policies: 6.2	Department			
<b>6.2 Energy Rebate Program</b> Partner with Utility Companies to promote energy rebate programs. No fee or discounted permits for energy efficient projects over and above the Title 24 requirements may be explored. Examples include installation of photovoltaic systems, tank-less water heater, natural gas recharge connection, electric vehicle recharge connection, wind power generator, etc. Housing Element Policies: 6.6	Community Development Department	General Fund, potential Grants	Seek available grants to partner with utility companies to promote energy rebate programs.	Consider reimplementing the energy efficient fee waiver by 2015
<b>6.3 Solar Energy and Conservation</b> Require that environmental analysis and subdivision plans address energy conservation measures and solar access. With the passage of AB 32, the City in anticipation with the State mandates will set thresholds within its CEQA checklist and require developers to address energy conservation measures applicable to their proposed development proposals. Housing Element Policies: 6.2, 6.3	Community Development Department	None necessary	On-going	Revise CEQA checklist by 2015
<b>6.4 Building Orientation</b> Promote energy efficiency by orienting homes to maximize natural day lighting. The City will work with potential developers during the conceptual review level (Design Review) by promoting building siting that maximizes natural day lighting. Housing Element Policies: 6.2, 6.3	Community Development Department	None necessary	On-going	On-going

**TABLE H- 20  
HOUSING ELEMENT PROGRAMS 2013-2021**

<b>Program</b>	<b>Responsible Agency</b>	<b>Funding Source</b>	<b>Quantified Objective</b>	<b>Timeframe</b>
<p><b>6.5 Water Efficiency</b></p> <p>Promote water-efficient landscapes, efficient irrigation, and use of permeable paving materials. Through educational materials and trainings, the City will promote water efficiency methods to its residents. Landscape beautification which results in water conservation could be encouraged through planting of drought tolerant plants, installation of drip irrigation, installation of rain detector/sensor irrigation, etc. Incentives such as over the counter permit plan check, discounted fee, or waiver of permit fee could be considered.</p> <p>Housing Element Policies: 6.4</p>	<p>Community Development Department</p>	<p>None necessary</p>	<p>Promote water efficient programs by conducting workshops and providing education materials on the City Website, public counter and at schools.</p>	<p>On-going</p>
<p><b>6.6 Green Building</b></p> <p>Streamline processing for approved green building.</p> <p>Housing Element Policies: 6.2, 6.3, 6.5</p>	<p>Community Development Department</p>	<p>General Fund</p>	<p>Continue to explore green building and sustainable building design to help conserve energy consumption. A fee waiver, discounted permits fees, or rebate may be considered in promoting Green Building program.</p>	<p>Ongoing-</p>
<p><b>Ongoing Review of Housing Element Programs</b></p>	<p>See Program 1.18</p>			
<p><b>Consolidated Plan</b></p>	<p>See Program 1.19</p>			

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**APPENDIX A  
REVIEW OF PAST PERFORMANCE**

## **REVIEW OF PAST PERFORMANCE**

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State law establishes an eight-year cycle regulating housing element updates. In compliance with the SCAG cycle, the Tustin Housing Element was updated in 1989 at which time it was found to be in compliance with State law, and was updated again in 1994. In 1997, the City of Tustin initiated a comprehensive General Plan update, and the Housing Element was again updated to accommodate the MCAS Reuse Plan and to ensure consistency with other General Plan Elements, as well as to address recent changes in State law. These amendments were adopted on January 16, 2001. In 2002 and 2009, the City updated its Housing Element and was certified by The State's Housing and Community Development Department in compliance with State's Law.

### **Review of Past Housing Element Objectives (2006-2014)**

The 2007 SCAG Regional Housing Needs Assessment indicated a new construction need in Tustin by 2014 of 2,381 units, of which 512 units were for very low income households, 410 for low income, 468 for moderate income and 991 for above moderate income.

The following discussion highlights the progress, effectiveness and appropriateness of 2006-2014 Housing Element Objectives and the progress achieved during the 2006-2014 time period. Table HTM-35 in the Technical Memorandum provides a more detailed summary of the City's overall accomplishments for the years 2006-2014.

As indicated in Table HTM-35, the City was successful in accomplishing the majority of the objectives established for the past planning period. According to City Staff, the following objectives were completely or partially met, or exceeded:

#### **New construction**

2,102 units were constructed during the 2006-2014 period, partially meeting the City's objective of 4,368 units for the planning period.

#### **Available Sites**

The program objective was to primarily utilize Planned Community Districts and Specific Plans to authorize and encourage mixed-use developments to assist in the development of new affordable owner and rental housing. The program has seen development of 2,012 units over the 8 year period.

#### **Mobile homes**

The objective to maintain existing units was accomplished.

**Deed restricted affordable units**

The objective of requiring deed restrictions to ensure continued affordability for low- or moderate-income housing constructed or rehabilitated with the assistance of any public funds as may be legally required was successfully met. Between the years 2006-2014, 243 restricted units were established.

**Pre-application conferences**

The objective to continue to utilize pre-application conferences and processing procedures to expedite processing was carried out during the review period.

**Transitional Housing**

The program objectives were to promote, assist, and facilitate the development of emergency and transient shelters through continued support of the County Homeless Assistance Program, and to support local agencies that provide homeless services with financial assistance. Also, the adoption of a Single Room Occupancy Ordinance was to be considered. The program has been effective in maintaining 3 homes with a total of 16 beds through the period, as well as 90 beds at the Orange County Social Services Tustin Family Campus facility as a shelter for abused and neglected children and their parents and for emancipated youth.

**Temporary housing for the homeless**

The program to support countywide efforts to assist approved homeless providers as part of the MCAS Tustin reuse effort was outlined in a series of specific objectives, all of which were achieved. A large variety of temporary and transitional facilities to be operated by various homeless providers have been developed at Tustin Legacy, as follows: Construction of the 192-bed Village of Hope facility to be operated by the Orange County Rescue Mission is complete. Twenty-three units of transitional housing operated by the Salvation Army have been completed at Tustin Field I, as well as acquired in the city of Buena Park with the City of Tustin's assistance. Six new transitional units for women and children have been completed in the Columbus Grove development at Tustin Legacy, operated by Human Options. An additional 6 units have been completed at Columbus Grove for families with children, operated by Orange Coast Interfaith Shelter. Finally, 14 units at Columbus Grove provide transitional housing for families with children by Families Forward (formerly Irvine Temporary Housing).

**Housing opportunities for all economic segments**

The program to monitor the implementation of the affordable housing program adopted as a part of the East Tustin Specific Plan has successfully met the objective of monitoring 174 units in East Tustin over the 10 year period.

**Bonding Programs**

Prior to its dissolution, the Redevelopment Agency successfully administered a bond financing program that processed a total of 252 restricted units for very-low and low income households to accomplish Five-Year Quantified Objectives and help meet the City's affordable housing needs.

### **Senior Citizen Housing**

The objective in protecting and providing senior citizen housing was identified as the preservation of 100 at-risk units. The 100 at-risk units were preserved throughout the review period.

### **Senior Services Program**

The City's objective to develop a senior services program consisting of a comprehensive transportation program, case management, information and referral, and a shared housing program to assist 850 elderly annually was exceeded with approximately 400 elderly receiving served meals annually between 2006 and 2014 and others receiving other services.

### **Ongoing Review of Housing Element Programs**

The objective to conduct an on-going review of Housing Element programs by preparing an annual report to the Planning Commission assessing the previous years' accomplishments toward meeting Housing Element objectives and then submitting the annual report to the State HCD was achieved.

### **Zoning Studies**

The City was to undertake zoning studies to consider new programs to encourage and promote affordable housing and recommend appropriate amendments for action by the Planning Commission and City Council. The program was effective in that the City completed the Market Analysis and conducted community meetings to gather input for the Town Center A New Beginning Study, and the City adopted a Reasonable Accommodation Ordinance in 2011.

### **Private Streets**

In order to reduce construction costs, the City adopted standards for private streets and continued to permit developers to install private rather than public streets when feasible. In the 2006-2014 period, private streets were created at Tustin Legacy.

### **Site Improvements**

New developments require the construction of site improvements which are often costs that are passed on from the developer to the housing consumer, creating an even greater barrier to qualifying for the purchase of home. In order to reduce these added housing costs, the objective was to evaluate the use of special assessment

district funding at MCAS Tustin (Tustin Legacy) as well as in other developing areas. During the 2006-2014 period, one of the community facilities district (CFD) bonds was refunded to take advantage of lower interest rates, thus reducing costs to property owners. Additionally, a new CFD was created at Tustin Legacy, and several special assessment district bonds from the mid-90s were defeased.

### **Environmental Constraints**

The on-going goal was to require program Environmental Impact Reports (EIR) on all major development projects to decrease the delays in processing and incorporating mitigation requirements into the development plans. During the Housing Element Planning Period, the Final Program EIS/EIR for MCAS Tustin served as the program EIR for the implementation of Tustin Legacy.

### **Density Bonus Program**

The objective was to process all requests for density bonuses in order to facilitate the construction of affordable housing. During the Housing Element Planning Period, the Density Bonus Ordinance was updated. Between 2001-2008, Lennar/Lyon were granted 182 density bonus units for the creation of affordable units at Columbus Square and Grove.

### **MCAS Tustin Redevelopment Project Area**

The goal to create a new redevelopment project area for the MCAS-Tustin site by adopting the MCAS-Tustin Specific Plan and Redevelopment Project area was attained. However, all redevelopment agencies in California were eliminated in 2011.

### **Fair Housing**

The City's objective to provide housing counseling services to assure equal housing opportunities by assisting approximately 400 residents annually and 3,000 residents by 2014 was partially met. Between 2006 and 2014, over 1,000 Tustin residents were provided with housing counseling services.

### **Shared Housing**

The City continued to provide coordination and support to an Orange County housing sharing program.

### **Housing Referral Program**

The City continued to provide housing referral services to families in need of housing assistance and information through the Police, Parks and Recreation Services, and Community Development Departments. The objective was to make 7,500 referrals to social agencies and 50 referrals for shared housing by 2014. Between 1998-2000, 4,375 social service referrals and 25 shared housing referrals were made.

### **Replacement Housing**

The program objective was to ensure rehabilitation or construction of an equal number of replacement units when low and moderate income residential units are destroyed or removed from the market. The City has exceeded its replacement housing obligations.

### **Housing Rehabilitation**

The goal to rehabilitate 162 units by allocating CDBG and Redevelopment Agency (eliminated 2011) funds to finance public improvements and rehabilitation of residential units in target areas was partially achieved. A total of 20 units were assisted with RDA funds over the review period.

### **Housing Authority**

The program to contract with the Orange County Housing Authority (OCHA) for the development and operation of federally assisted low and moderate income housing programs was continued **Rental Assistance**

The program to provide rental assistance through Section 8 certificates and voucher certificate program assistance funds through the OCHA was successful over the review period. The objective to issue 200 certificates/vouchers annually and 1,200 by 2014 was exceeded. Between 2008 and 2012, 1,704 certificates/vouchers were issued.

### **Affordable Senior Housing Project and Senior Board and Care Facility**

The program objective to maintain 74 units of affordable senior housing (20 units at 17432-17442 Mitchell Avenue and 54 units at 1311 Sycamore Avenue) was achieved. Over the review period, 74 housing units were maintained.

### **Preservation of Assisted Housing**

Tustin has a total of 100 low income units that have been at risk of conversion during the review period. The objective to monitor and preserve all of these units at risk was completed successfully.

### **Enforcement of Building and Housing Codes**

The City's Code enforcement conducted over 2,240 property maintenance and housing code related inspections between 2008 and 2012. The City has been successful in getting property owners to abate code violations.

#### **Cultural Resources District**

The purpose of the City's Cultural Resources Overlay District is to safeguard the heritage of the City by preserving neighborhoods and structures that reflect the City's heritage and past. The objective in the planning period was to rate historic structures where applicable and process certificates of appropriateness as received. Between 2008 and 2012, the Community Development Department issued 89 Certificates of Appropriateness certifying building changes were consistent with design guidelines and appropriate within the District context.

#### **Energy Conservation**

All new construction is required to be subject to state energy conservation (Title 24) requirements as a condition for the issuance of a building permit. Between 2008 and 2012, 1,231 new units were required by the City to meet these standards.

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**APPENDIX B**  
**AFFORDABILITY GAP ANALYSIS**

# City of Tustin

## Affordability Gap and Leveraged Financing Analysis

### 1.0 Executive Summary

The City of Tustin retained David Paul Rosen & Associates (DRA) to prepare an affordability gap analysis and evaluation of leveraged financing options for new residential development in Tustin. The "affordability gap" methodology determines the difference between the supportable mortgage on the unit at affordable rents and sales prices and the actual development cost of the unit. The gap analysis provides planning-level estimates of the typical per unit subsidized required to make different types of housing affordable to households at alternative income levels.

The per unit affordability gaps calculated in this report are based on housing prototypes that are 100% affordable to households at each of the income levels modeled (or in the case of the leveraged financing analysis, at the mix of income levels necessary to meet the requirements and/or competitive standards of the leveraged financing programs). However, the results can be used in estimating subsidy requirements for mixed income housing developments as well. Under the assumption that the market rate units are financially feasible without subsidy, the subsidy requirement for a mixed income development can be estimated by multiplying the number of affordable units by the appropriate per unit affordability gap. The results of the gap analysis provide a useful tool to the City of Tustin and Tustin Redevelopment Agency for capital planning purposes. DRA recommends that the subsidy provided to any individual housing development be determined based on analysis of the specific economic conditions pertaining to that project.

The first step in the gap analysis establishes the amount a tenant or homebuyer can afford to contribute to the cost of renting or owning a dwelling unit based on established State and Federal standards. Income levels, housing costs and rents used in the analysis are defined below using 2007 published data for Tustin.

The second step estimates the costs of new housing construction in Tustin. For this purpose, DRA, in collaboration with City staff, formulated five prototypical housing developments (one rental development and four owner developments) suitable for the Tustin market today. DRA estimated the cost to develop these housing prototypes in Tustin under current housing conditions using information on actual recent housing developments provided by Tustin and Orange County area developers.

The third step in the gap analysis establishes the housing expenses borne by the tenants and owners. These costs can be categorized into operating costs, and financing or mortgage obligations. Operating costs are the maintenance expenses of the unit, including utilities, property maintenance and/or Homeownership Association (HOA) fees, property taxes, management fees, property insurance, replacement reserves, and insurance. For the rental prototype examined in this analysis, DRA assumes that the

landlord pays all but certain tenant-paid utilities as an annual operating cost of the unit paid from rental income. For owner prototypes, DRA assumes the homebuyer pays all operating and maintenance costs for the home.

Financing or mortgage obligations are the costs associated with the purchase or development of the housing unit itself. These costs occur when all or a portion of the development cost is financed. This cost is always an obligation of the landlord or owner. Supportable financing is deducted from the total development cost, less any owner equity or downpayment, to determine the gap between the supportable mortgage on the affordable units and the cost of developing those units.

For the rental housing prototype, the gap analysis calculates the difference between total development costs and the conventional mortgage supportable by net operating income from restricted rents. For owners, the gap is the difference between development costs and the supportable mortgage plus the buyer's down payment. Affordable housing costs for renters and owners are calculated based on California Redevelopment Law definitions and occupancy standards. Household income is adjusted based on an occupancy standard of one person per bedroom plus one.

The gaps for the owner prototypes are summarized in Table 1. The gaps have been calculated for the following three income levels:

	Income Limit	Affordable Housing Cost
1. Very Low Income	50% of Area Median Income (AMI), adjusted for household size	30% of 50% AMI
2. Low Income	80% of AMI, adjusted for household size	30% of 70% AMI
3. Moderate Income	120% of AMI, adjusted for household size	35% of 110% AMI

Depending upon the source of subsidy for ownership housing, the gaps may vary. For example, Federal HOME funds do not require deduction of a utility allowance in the calculation of affordable mortgage payment. However, under California Redevelopment Law, owner affordable housing expense is defined to include monthly utility costs. This increases the ownership gaps. The affordability gaps shown in Table 1 include utility allowance deductions.

The gaps for the rental prototype, without non-local leveraged financing, are summarized in Table 2. The gaps have been calculated for the following three income levels:

	Income Limit	Affordable Housing Cost
1. Very Low Income	50% of Area Median Income (AMI), adjusted for household size	30% of 50% AMI
2. Low Income	80% of AMI, adjusted for household size	30% of 60% AMI
3. Moderate Income	120% of AMI, adjusted for household size	30% of 110% AMI

DRA produced, under separate cover, a comprehensive review of Federal, State, and private sources of funding that might be used to subsidize affordable rental and ownership housing in Tustin. For ownership housing, per unit mortgage assistance, as available, generally reduces the gap on a dollar for dollar basis. For rental developments, the use of the Low Income Housing Tax Credit Program and/or tax-exempt bonds is more complicated, because of the formulas for calculating tax credits and the specific income targeting required.

Therefore, for the rental prototype, we have examined the following leverage scenarios:

1. 9% Low Income Housing Tax Credits (Federal only)<sup>1</sup>;
2. 4% tax credits with tax-exempt bonds; and
3. 4% tax credits, tax-exempt bonds, and the Multifamily Housing Program (MHP) of the California Department of Housing and Community Development (HCD).

The assumptions and findings are described in the following section. The sources and uses for each leveraged rental scenario are summarized in Table 3.

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<sup>1</sup> Since Orange County was designated as a Difficult to Develop Area (DDA) by HUD in 2007, projects in the County are eligible for a 130% basis boost for the calculation of Federal tax credits but are not eligible for State tax credits.

**Table 1**  
**Homeowner Per Unit Subsidy Requirements<sup>1</sup>**  
**City of Tustin**  
**2008**

<u>Prototype/Unit Bedroom Count</u>	<u>Very Low Income<sup>2</sup></u>	<u>Low Income<sup>3</sup></u>	<u>Moderate Income<sup>4</sup></u>
<b>Owner Prototype #1<sup>5</sup></b>			
Attached Townhome			
Two Bedroom	\$366,000	\$322,400	\$195,500
Three Bedroom	\$387,800	\$339,400	\$198,400
Four Bedroom	\$426,800	\$374,600	\$222,300
Average	\$393,500	\$345,500	\$205,400
<b>Owner Prototype #2<sup>6</sup></b>			
Stacked Flat Condominium			
One Bedroom	\$258,600	\$219,900	\$107,100
Two Bedroom	\$259,000	\$215,500	\$88,600
Three Bedroom	\$267,100	\$218,800	\$77,800
Four Bedroom	\$290,500	\$238,300	\$86,000
Average	\$268,800	\$223,100	\$89,900
<b>Owner Prototype #3<sup>7</sup></b>			
High Density Condominium			
One Bedroom	\$407,500	\$368,800	\$256,000
Two Bedroom	\$432,500	\$389,000	\$262,100
Three Bedroom	\$542,000	\$493,700	\$352,600
Four Bedroom	\$569,400	\$517,200	\$364,800
Average	\$487,900	\$442,200	\$308,900
<b>Owner Prototype #4<sup>8</sup></b>			
Mixed Use, Ground Floor Retail			
One Bedroom	\$491,700	\$453,000	\$340,200
Two Bedroom	\$537,400	\$493,900	\$366,900
Three Bedroom	\$595,000	\$546,600	\$405,600
Average	\$541,300	\$497,800	\$370,900

Source: David Paul Rosen & Associates

Notes to Table 1:

<sup>1</sup> Per unit subsidy requirements are calculated as per unit total development cost less affordable home purchase price, based on an occupancy standard of one person per bedroom plus one, per California Redevelopment Law. Affordable home purchase price is calculated based on monthly affordable housing expense, inclusive of mortgage principal and interest, property taxes and insurance, utilities and homeowners association (HOA) dues. Calculations are based on the following assumptions: 30-year mortgage interest rate of 8 percent; average property tax rate of 1.20 percent; property insurance costs of \$50 per month; HOA dues of \$175 per month; and a utility allowance calculated based on County of Orange, Housing and Community Services Department utility allowance schedule, effective October 1, 2006.

<sup>2</sup> Very low income owner affordable housing is cost calculated as 30 percent of 50 percent of AMI, adjusted for household size. Average very low income affordable home purchase price is \$70,764.

<sup>3</sup> Low income owner affordable housing cost is calculated as 30 percent of 70 percent of AMI, adjusted for household size. Average low income affordable home purchase price is \$116,457.

<sup>4</sup> Moderate income owner affordable housing cost is calculated as 35 percent of 110 percent of AMI, adjusted for household size. Average moderate income affordable home purchase price is \$249,723.

<sup>5</sup> Owner Prototype #1 average unit size is 1,296 square feet. Average per unit development cost is \$468,663. Per unit development costs are adjusted by unit size/bedroom count.

<sup>6</sup> Owner Prototype #2 average unit size is 1,142 square feet. Average per unit development cost is \$339,591. Per unit development costs are adjusted by unit size/bedroom count.

<sup>7</sup> Owner Prototype #3 average unit size is 1,350 square feet. Average per unit development cost is \$558,617. Per unit development costs are adjusted by unit size/bedroom count.

<sup>8</sup> Owner Prototype #4 average unit size is 1,515 square feet. Average per unit development cost is \$608,112. Per unit development costs are adjusted by unit size/bedroom count.

**Table 2**  
**Tenant Per Unit Subsidy Requirements<sup>1</sup>**  
**Rental Housing Prototype: Stacked Flat Apartments**  
**City of Tustin**  
**2008**

<u>Unit Bedroom Count</u>	<b>Renter Prototype Stacked Flat Apartments</b>		
	<u>Very Low Income<sup>2</sup></u>	<u>Low Income<sup>3</sup></u>	<u>Moderate Income<sup>4</sup></u>
One Bedroom <sup>5</sup>	\$311,300	\$294,600	\$211,400
Two Bedroom <sup>6</sup>	\$348,000	\$329,300	\$235,600
Three Bedroom <sup>7</sup>	\$321,800	\$301,000	\$197,000
Four Bedroom <sup>8</sup>	\$402,000	\$379,600	\$174,800
Average	\$345,775	\$326,125	\$204,700

Source: David Paul Rosen & Associates.

Notes to Table 2:

<sup>1</sup> Tenant per unit subsidy requirements are calculated as per unit total development cost less per unit tenant supported debt. Tenant supported debt is calculated based on tenant monthly operating income which equals: affordable monthly rent, inclusive of utilities, less a monthly per unit operating cost of \$300, property taxes assumed at an average annual rate of 1.20 percent; and a 3 percent vacancy rate. Tenant supported debt calculations are based on a 30-year mortgage interest rate of 8 percent and a debt coverage ratio of 1.25. Affordable monthly rents are based on household income, adjusted for household size assuming an occupancy standard of one person per bedroom plus one, per California Redevelopment Law.

<sup>2</sup> Very low income renter affordable housing cost is calculated as 30 percent of 50 percent of AMI, adjusted for household size. Average very low income affordable monthly rent is \$847.

<sup>3</sup> Low income renter affordable housing cost calculated as 30 percent of 60 percent of AMI, adjusted for household size. Average low income affordable monthly rent is \$1,033.

<sup>4</sup> Moderate income renter affordable housing cost calculated as 30 percent of 110 percent of AMI, adjusted for household size. Average moderate income affordable monthly rent is \$1,963.

<sup>5</sup> One bedroom unit is 750 square feet. Per unit total development cost is \$321,075.

<sup>6</sup> Two bedroom unit is 950 square feet. Per unit total development cost is \$362,224.

<sup>7</sup> Three bedroom unit is 1,050 square feet. Per unit total development cost is \$382,799.

<sup>8</sup> Four bedroom unit is 1,250 square feet. Per unit total development cost is \$423,947.

Table 3

Average Per Unit Subsidy Requirements  
Rental Housing Prototype: Stacked Flat Apartments  
Leveraged Financing Scenarios  
City of Tustin  
2008

<u>Leveraged Financing Scenarios</u>	<u>Renter Prototype Stacked Flat Apartments</u>
9% Tax Credits	\$57,000
4% Tax Credits, Tax-Exempt Bonds	\$140,100
4% Tax Credits, Tax-Exempt Bonds, Multi-Family Housing Program (MHP)	\$109,600

Source: David Paul Rosen & Associates.

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**APPENDIX C  
PUBLIC PARTICIPATION MAILING LIST**

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Veterans Service Dept.  
4220 Lemon Street  
Riverside, CA 92501

Dayle McIntosh Center  
13272 Garden Grove  
Garden Grove, CA 92843

Orange Coast Interfaith Shelter  
1963 Wallace Street  
Costa Mesa, CA 92627

YMCA of Orange County  
13821 Newport Ave., Suite #200  
Tustin, CA 92780

Assistance League of Tustin  
P.O. Box 86  
Tustin, CA 92781

Families First  
12012 Magnolia Street  
Garden Grove, CA 92641-3346

Tustin Area Historical Society &  
Museum  
395 El Camino Real  
Tustin, CA 92780

Legal Aid Society of Orange County  
2101 N. Tustin Avenue  
Santa Ana, CA 92705

Community Services Programs Inc.  
1221 East Dyer Rd., Suite 120  
Santa Ana, CA 92705

Probation Community Action  
Assoc.  
18627 brookhurst Street #425  
Fountain Valley, CA 92708-6748

Mardan Foundation of Educational  
Therapy  
1 Osborn  
Irvine, CA 92604

Ronald M. Griffith  
Century Housing  
1000 Corporate Pointe, Suite 200  
Culver City, CA 90230

Helen Anderson  
Hunger Coalitions  
14452 Wildeve Lane  
Tustin, CA 92780

Allen Baldwin  
OC Community Housing Corp.  
2024 N. Broadway, 3rd Flr.  
Santa Ana, CA 92706-2623

Mary's Shelter  
P.O. Box 10433  
Santa Ana, CA 92711

Diane Aust  
Tustin Area Council for Fine Arts  
P.O. Box 145  
Tustin, CA 92781

Doug Bistry  
O.C. Affordable Housing  
23861 El Toro Road, Suite 207  
Lake Forest, CA 92640-4733

Civic Center Barrio  
980 W. 17th Street, Unit E  
Santa Ana, CA 92706

Vanessa Bruner  
Learning for Life - Orange County  
1211 East Dyer  
Santa Ana, CA 92705

Jerry Caminti  
Disability Awareness Coalition  
3773 University Drive, #118  
Irvine, CA 92612

Patrick Carroll  
Life Share  
11421 Garden Grove Blvd.  
Garden Grove, CA 92643

Holly Hagler  
Community Services Programs Inc.  
1200 N. Knollwood Circle  
Anaheim, CA 92801

Donna Core  
Meals on Wheels  
1001 N. Tustin Ave.  
Santa Ana, CA 92707

Community Action Partnership of  
Orange County  
11870 Monarch Street  
Garden Grove, CA 92841

Keith Rhodes  
Big Brothers & Sisters of OC  
14131 Yorba Street, Suite 200  
Tustin, CA 92780

John Drew  
Family Solutions  
203 N. Golden Circle Dr., #101  
Santa Ana, CA 92705

Janie Wolicki  
Women Helping Women  
1800 East McFadden Ave., Suite 1A  
Santa Ana, CA 92705

John Von Glahn  
Family Service Association  
18001 Cowan, Units C-D  
Irvine, CA 92714-6801

Jason Suppes  
Four H Clubs of Orange County  
1045 Arlington Dr.  
Costa Mesa, CA 92626

Mary Hadley  
Info Line Orange County  
2081 Business Center Dr., Suite 130  
Irvine, CA 92715

Mercy House Transitional Living  
Ctr.  
P.O. Box 1905  
Santa Ana, CA 92702

Dawn Price  
Friendship Shelter, Inc.  
P.O. Box 4252  
Laguna Beach, CA 92652

Elmer Hothus  
Christian Temporary Housing  
Facility  
704 N. Glassell Street  
Orange, CA 92867

Warren Johnson  
Salvation Army  
10200 Pioneer Road  
Tustin, CA 92780

Judy Johnson  
ESA / Corporate Office  
23861 El Toro Road, Suite 207  
Lake Forest, CA 92640-4733

Becky Johnson  
Alliance for the Mentally Ill  
621 S. "B" Street  
Tustin, CA 92780

Habitat for Humanity of Orange  
County  
2200 S. Ritchey Street  
Santa Ana, CA 92705

Tustin Public School Foundation  
150 El Camino Real, #140  
Tustin, CA 92780

Children's Bureau of Southern  
California  
50 S. Anaheim Boulevard, Suite. 241  
Anaheim, CA 92805

Orange Children & Parents  
Together  
1063 N. Glassell Street  
Orange, CA 92867

The Villa Center, Inc.  
910 North French  
Santa Ana, CA 92701

Laura Archuleta  
Jamboree Housing Corp.  
17701 Cowan Ave., Suite 200  
Irvine, CA 92614

OCSPCA-Paws  
P.O. Box 6507  
Huntington Beach, CA 92615

Jonathan Stone  
Tustin Chamber of Commerce  
700 W. First Street, Suite 7  
Tustin, CA 92780

Theresa Marji  
Legal Aid Society of Orange County  
2101 N. Tustin Avenue  
Santa Ana, CA 92705

Charlene M. Ashendorf  
Laurel House  
P.O. Box 3182  
Tustin, CA 92781

Easter Seal Society, Inc.  
1570 E. 17th Street  
Santa Ana, CA 92705

Sherry McCulley  
Legal Aid Society of Orange County  
2010 N. Tustin Avenue  
Santa Ana, CA 92705

OC Council on Aging  
1971 E. 4th Street, #200  
Santa Ana, CA 92705

Jim Miller  
American Family Housing  
15161 Jackson Street  
Midway City, CA 92655-1432

Ellen Waild  
Lutheran Social Service of Southern  
California  
2560 North Santiago Blvd.  
Orange, CA 92867

Donald VerLeur  
Olive Crest  
2130 E. Fourth Street, Suite 200  
Santa Ana, CA 92705

Boys & Girls Club of Tustin  
580 W. Sixth Street  
Tustin, CA 92780

Denise Y. Cato  
Fair Housing Council of OC  
201 S. Broadway  
Santa Ana, CA 92701

Barbara Resnick  
Western Dev. For Affordable  
Housing  
112 E. Champan Avenue  
Orange, CA 92867

Joyce Riley  
Learning Disabilities of Southern  
California  
P.O. Box 25772  
Santa Ana, CA 92799

Rich Gorham  
St. Vincent de Paul Center for  
Reconciliation  
1505 E. 17th Street, Suite 109  
Santa Ana, CA 92705

Orange County Homeless Issues  
Task Force  
1770 N. Broadway  
Santa Ana, CA 92706

Kathleen Buehler  
The Blind Children's Learning  
Center  
18542-B Vanderlip Ave.  
Santa Ana, CA 92705

Susan Stokes  
Turning Point Center for Families  
2101 E. 4th Street, #150-B  
Santa Ana, CA 92705-3814

Donald Taylor  
Veteran Charities of Orange County  
201 S. Sullivan Street  
Santa Ana, CA 92704

Ed Gerber  
Lestonnac Free Clinic  
1215 E. Chapman Ave.  
Orange, CA 92866

Lynne Tsuda  
Central Orange County YWCA  
P.O. Box 689  
Orange, CA 92865

Service People in Need  
151 Kalmus #H-2  
Costa Mesa, CA 92626

Clyde Weinman  
Irvine Temporary Housing  
6427 Oak Canyon  
Irvine, CA 92620

Karen Weisenberger  
Consumer Credit Counseling  
Service  
P.O. Box 11330  
Santa Ana, CA 92711

Tim Wells  
Episcopal Service Alliance  
525 Main Street  
Huntington Beach, CA 92648

Randy Wenz  
Orange County Council BSA  
1211 E. Dyer Street  
Santa Ana, CA 92705

Thomas Whaling  
Shelter for the Homeless  
24621 Ridgewood Circle  
Lake Forest, CA 92630

Lorri Galloway  
The Eli Home, Inc.  
1175 N. East Street  
Anaheim, CA 92805

Carol Anne Williams  
Interval House  
P.O. Box 3356  
Seal Beach, CA 90740

Pilgrimage Family Therapy  
23201 Mill Creek Road, #220  
Laguna Hills, CA 92653

Vickie Talley  
OC Housing Providers  
25241 Paseo de Alicia #120  
Laguna Hills, CA 92653

Hunter L. Johnson  
LINC Housing  
110 Pine Street, Suite 500  
Long Beach, CA 90802

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

Steve PonTell  
National Community Renaissance  
9065 Haven Ave., Suite 100  
Rancho Cucamonga, CA 91730

Patrick McCabe  
William Lyon Homes, Inc.  
4490 Von Karman Ave.  
Newport Beach, CA 92660

Steven Johsz  
Orange County Social Services,  
Tustin Family Campus  
1152 E. Fruit Street, Suite 550  
Santa Ana, CA 92701

Debbie Phares  
Orange County Congregation  
Community Organization  
P.O. Box 2  
Anaheim, CA 92805

Glenn Hayes  
Neighborhood Housing Services of  
Orange County  
198 W. Lincoln Ave., 2nd Floor  
Anaheim, CA 92805

Maria I. Marquez  
Adult Mental Health Services  
405 West Fifth Street, Suite 550  
Santa Ana, CA 92701

Maury Ruano  
Mercy Housing  
2240 W. Lincoln Avenue  
Anaheim, CA 92801

Randy Gibeaut  
Community Housing Resources  
1411 North Broadway  
Santa Ana, CA 92706

Brenda Rodriguez  
Affordable Housing Clearinghouse  
23861 El Toro Road, Suite 401  
Lake Forest, CA 92630

Mike Balsamo  
BIA Orange County Chapter  
17744 Sky Park Circle, #170  
Irvine, CA 92614

Bart G. Hess  
Affordable Home Owners Alliance  
2 Park Plaza, Suite 100  
Irvine, CA 92614-5904

Jim Palmer  
Orange County Rescue Mission  
1 Hope Drive  
Tustin, CA 92782

Kenneth W. Babcock  
Public Law Center  
601 Civic Center Drive West  
Santa Ana, CA 92701-4002

Kelly Lupro  
OC Housing & Community  
Development  
1770 N. Broadway  
Santa Ana, CA 92706

Karen Roper  
OC Housing & Community  
Development  
1770 N. Broadway  
Santa Ana, CA 92706

Captain Lee Lescano  
The Salvation Army  
10200 Pioneer Road  
Tustin, CA 92782

Maya Dunne  
SHJHS Foundation & Community  
Outreach  
500 S. Main St., Suite 1000  
Orange, CA 92868

Scott Larson  
HomeAid Orange County  
17744 Sky Park Circle, #170  
Irvine, CA 92614

Cynthia Campbell  
Human Options, Inc. (DOVE  
Housing)  
P.O. Box 9376  
Newport Beach, CA 92658

Margie Wakeham  
Families Forward  
9261 Irvine Blvd.  
Irvine, CA 92618

Joan B. Bargol  
Orange Coast Interfaith Shelter  
1963 Wallace Avenue  
Costa Mesa, CA 92627

Sheri Barrios  
Orange Coast Interfaith Shelter  
1963 Wallace Avenue  
Costa Mesa, CA 92627

Linda Tang  
Kennedy Commission  
17701 Cowan Ave., Suite 200  
Irvine, CA 92614

Affirmed Housing Group  
13520 Evening Creek Dr. North,  
#160  
San Diego, CA 92128

Cesar Covarrubias  
The Kennedy Commission  
17701 Cowan Ave., Suite 200  
Irvine, CA 92614

David Levy  
14331 Browning #24  
Tustin, CA 92780

John H. Cochrane, III  
be.group - Senior Living  
516 Burchett Street  
Glendale, CA 91203

Lucy Dunn  
Orange County Business Council  
2 Park Plaza, Suite 100  
Irvine, CA 92614

Jacqui Kerze  
Regional Center of Orange County  
P.O. Box 22010  
Santa Ana, CA 92702-2010

**APPENDIX D  
REFERENCES**

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## **REFERENCES**

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### **A. Documents**

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  24. Marshall & Swift
  25. State of California Government Code Sections 65580 et seq.
- B. Persons and Organizations**
1. Elizabeth A. Binsack, Community Development Director  
Community Development Department, Tustin  
(714) 573-3031
  2. Jerry Craig, Program Manager  
Tustin Successor Agency  
(714) 573-3121
  3. Justina Willkom, Assistant Director - Planning  
Community Development Department, Tustin  
(714) 573-3115
  4. Scott Reekstin, Principal Planner  
Community Development Department, Tustin  
(714) 573-3016

**Appendix to  
Housing Element**

5. Edmelynne Hutter , Associate Planner  
Community Development Department, Tustin  
(714) 573-3174
  
6. Lieutenant Steve Lewis  
Tustin Police Department  
(714) 573-3271
  
6. Ben Savill  
Community Housing Advisory Council  
Regional Center of Orange County
  
7. John Luker  
Orange County Rescue Mission Village of Hope  
(714) 247-4300